



# Cabinet

## Agenda

Tuesday, 17th September, 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 - TUESDAY, 17TH SEPTEMBER, 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 14 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 30 July 2024 (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.

Environment and Community Panel – 3 September 2024

Corporate Performance Panel – 4 September 2024

Regeneration and Development Panel – 10 September 2024

**10. HOMELESSNESS AND ROUGH SLEEPER STRATEGY (Pages 12 - 65)**

**11. AIR QUALITY ACTION PLAN REVISION (Pages 66 - 117)**

**12. LOCAL AUTHORITY HOUSING FUND - ROUND 3 (Pages 118 - 140)**

**13. 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 item below on the grounds that it involves the likely disclosure of exempt information as defined by paragraph 3 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.

**14. STRATEGIC LAND ACQUISITION (Pages 141 - 154)**

To: Members of the Cabinet

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

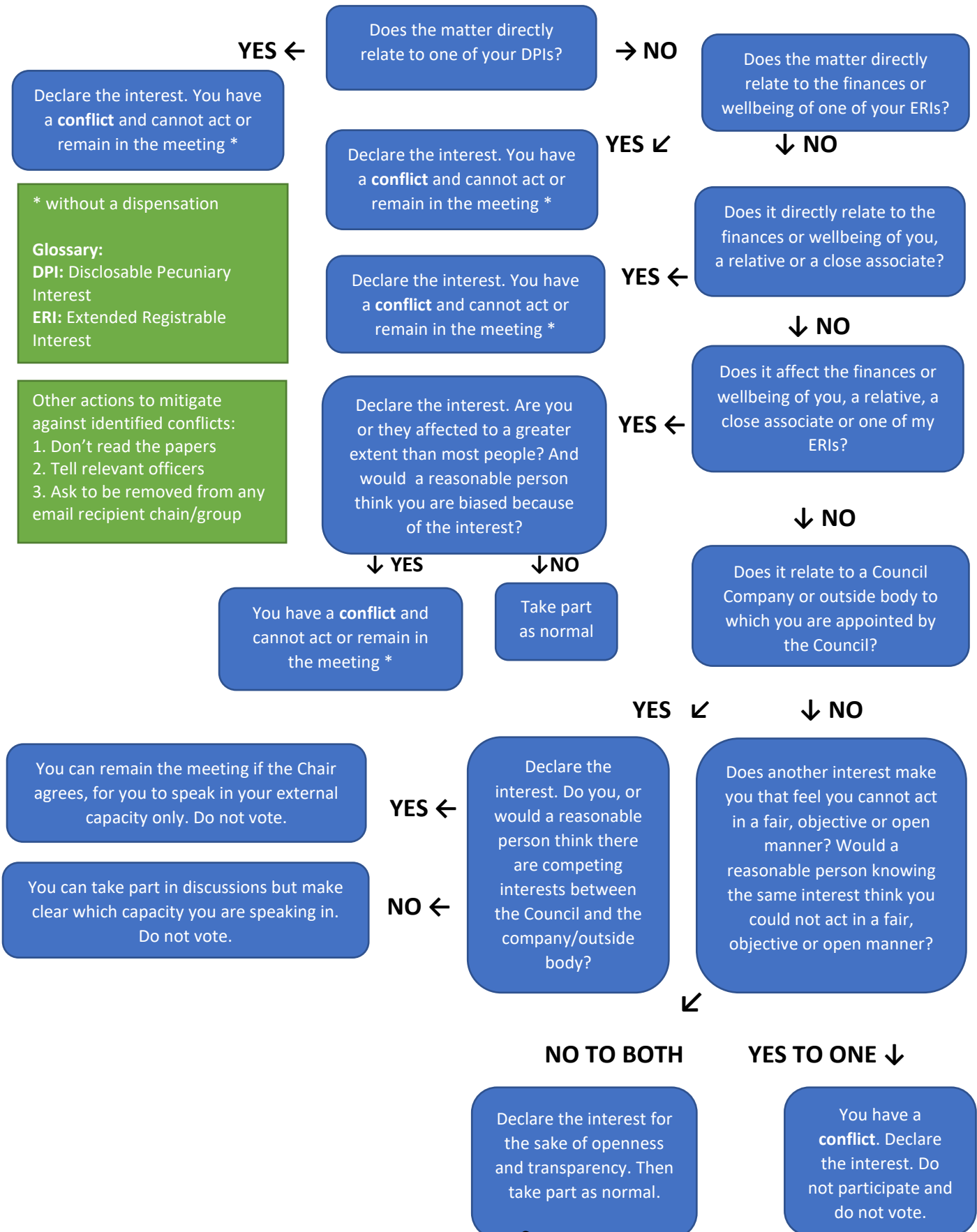
For Further information, please contact:

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



Declare the interest. You have a **conflict** and cannot act or remain in the meeting \*

\* without a dispensation

**Glossary:**

DPI: Disclosable Pecuniary Interest

ERI: Extended Registrable Interest

Other actions to mitigate against identified conflicts:

1. Don't read the papers
2. Tell relevant officers
3. Ask to be removed from any email recipient chain/group

**FORWARD DECISIONS LIST**

<b>Date of meeting</b>	<b>Report title</b>	<b>Key or Non Key Decision</b>	<b>Decision Maker</b>	<b>Cabinet Member and Lead Officer</b>	<b>List of Background Papers</b>	<b>Public or Private Meeting</b>
17 September 2024						
	Homelessness and Rough Sleeping Strategy Update	Non	Council	Community Asst Director - D Hall		Public
	Air Quality Action Plan	Non	Cabinet	Climate Change and Biodiversity Asst Dir – S Ashworth		Public
	LAHF Round 3	Non	Cabinet	Asst Dir – D Hall		Public
	Strategic Land Acquisition	Key	Cabinet	Business and Culture Asst Dir – M Henry		Private

<b>Date of meeting</b>	<b>Report title</b>	<b>Key or Non Key Decision</b>	<b>Decision Maker</b>	<b>Cabinet Member and Lead Officer</b>	<b>List of Background Papers</b>	<b>Public or Private Meeting</b>
Special Meeting 17 October 2024						
	Procurement Policy and Contract Standing Orders	Non	Council	Finance Monitoring officer		Public
	Social Value Policy	Non	Council	Leader Monitoring Officer		Public
	Norfolk Economic Strategy (NCC report for endorsement)	Non	Cabinet	Business Asst Dir D Hall		Public
	Hunstanton Bus Station Library Development	Key	Council	Leader Asst Dir D Hall		Public

<b>Date of meeting</b>	<b>Report title</b>	<b>Key or Non Key Decision</b>	<b>Decision Maker</b>	<b>Cabinet Member and Lead Officer</b>	<b>List of Background Papers</b>	<b>Public or Private Meeting</b>
5 November 2024						
	West Norfolk Economic Strategy	Non	Council	Business Asst Dir D Hall		Public
	Disabled Facilities Grant Framework	Key	Cabinet	People and Communities Asst Dir M Whitmore		Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Article 4 Direction	Non	Cabinet	Regeneration and Development Assistant Director – S Ashworth		Public
	Empty Homes Strategy Review	Key	Council	People and Communities Asst Dir M Whitmore		Public
	Gambling Act – Statement of Principles	Non	Council	Planning and Licensing Assistant Director – A Baker		Public
	Disabled Facilities Grant Framework	Key	Cabinet	Finance Asst Director – M Whitmore		Part Public Part Exempt Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)



	Redundancy Payments Scheme	Non	Council	Leader Asst Dir – B Box		Public
	Constitution Review	Non	Council	Leader Asst Dir – A Baker		Public
	Review of Appointments to Outside Bodies	Non	Cabinet	Leader Chief Executive		Public
	Florence Fields – Tenure Mix	Non	Council	Deputy Leader Exec Director – O Judges		Part Public and part Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
6	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)
	Long-Term Plan for Towns	Key	Cabinet	Leader Asst Dir – D Hall		Public
	Recommendations from the Biodiversity Task Group	Non	Cabinet	Development and Regeneration Asst Dir – S Ashworth		Public
	Annual Governance Statements 22-23 & 23-24	Key	Council	Leader Ass Dir- A Baker		Public
	Council Tax Support scheme 2025/2026	Key	Council	Finance Asst Dir – 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
5 December 2024						
	Gambling Act Policy	Non	Council	Planning & Licensing Assistant Director A Baker		Public
	King's Lynn Cultural & Heritage Strategy					
	Investment Options for Leisure Assets'	Key	Cabinet	Deputy Leader Monitoring Officer		Part Public and part Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)

10

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
14 January 2025						

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
4 February 2025 (non budget items)						

	Local Plan	Key	Council	Planning & Licensing Asst Dir – S Ashworth		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 February 2025 (Budget items)						
	Budget 2025-28	Key	Council	Finance Asst Dir – M Drewery		Public

**Items to be scheduled**

11	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
	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**

<b>Open</b>		Would any decisions proposed :			
<b>Any especially affected Wards</b>	Discretionary	Be entirely within Cabinet's powers to decide		Yes	
		Need to be recommendations to Council		Yes	
		Is it a Key Decision			
Lead Member: Cllr Rust E-mail: <a href="mailto:cllr.rust@west-norfolk.gov.uk">cllr.rust@west-norfolk.gov.uk</a>			Other Cabinet Members consulted: None		
			Other Members consulted:		
Lead Officer: Nikki Patton <a href="mailto:Nikki.patton@west-norfolk.gov.uk">Nikki.patton@west-norfolk.gov.uk</a> Andy King E-mail: <a href="mailto:Andy.King@west-norfolk.gov.uk">Andy.King@west-norfolk.gov.uk</a> Direct Dial: 01553616422			Other Officers consulted: Duncan Hall Assistant Director, Regeneration, Housing & Place		
Financial Implications Yes	Policy/ Personnel Implications No	Statutory Implications YES	Equal Impact Assessment YES If YES: Full EIA	Risk Management Implications Yes	Environmental Considerations No

**Date of meeting: 17th September 2024**

**HOMELESSNESS AND ROUGH SLEEPER STRATEGY UPDATE**

**SUMMARY**

All housing authorities are required by law to produce a Homelessness and Rough Sleeping Strategy once every five years. This report sets out the process by which a new Homelessness & Rough Strategy has been developed and how progress will be monitored and evaluated.

Before publishing the strategy, housing authorities have the power to carry out a review of homelessness services in their district.

A Homelessness Review was carried out in the autumn/winter of 23/24, was published in April this year, and laid the foundation for developing an effective strategy: led by data and supported by professional and lived experience. The Homelessness Review considers the current situation and analyses the reasons, causes and wider factors affecting homelessness in this area. The Homelessness Review and its findings were endorsed by the Environment and Community Panel on 9<sup>th</sup> April 2024.

The new Homelessness & Rough Sleeping Strategy 2024-2029 responds to the issues identified in the review and provides a framework for responding to homelessness in Borough. It replaces the 2019- 2024 strategy.

**Recommendation**

That the 2024-2029 Strategy is adopted and that the role of the Environment and Community Panel group "Homelessness and Housing

Delivery Task Group” in overseeing the delivery of the Action Plan within the strategy is endorsed.

### **Reason for Decision**

The Council has a statutory duty to produce a homelessness strategy (Homelessness Act 2002) setting out the issues it faces locally and what it is doing to prevent homelessness. The Council’s commitments to preventing homelessness are set out in the Corporate Plan.

## **1. Background**

- 1.1 When the 2019 to 2024 strategy was written, West Norfolk was responding to an all-time peak in rough sleeping, the most visible form of homelessness. Since 2019 there has been a sustained and successful partnership effort to reduce instances of rough sleeping locally. Looking forward, though, we have a different, less visible set of challenges.
- 1.2 Homelessness in the borough is largely hidden, but the volume of households approaching the council as homeless has doubled since the COVID pandemic. Levels of rough sleeping in the borough are comparatively low, but there are people in the borough who are neither street homeless nor adequately housed. Services exist to help prevent homelessness, but we don’t always get to people early enough.
- 1.3 The review of the 2019-2024 strategy was carried out in the autumn and winter of 2023/24, with extensive input from council officers, partner agencies and people with lived experience of homelessness. The findings were presented to the Environment and Community Panel on 9<sup>th</sup> April 2024 and endorsed by the panel. The findings of the Review laid the foundations for the new Strategy 2024-2029.

## **The Review**

- 1.4 In summary, the Review identified that the Council’s effectiveness in preventing homelessness since the publication of the last strategy (2029-2024) has improved, but is ebbing away due to new challenges, such as cost of living pressures and an overheated private rented sector.
- 1.5 The Homelessness Review provides an overview of homelessness experience and provision in King’s Lynn and West Norfolk. It looks at:
  - The current and future levels of homelessness in the borough,
  - The available provision of services for people experiencing or facing homelessness,
  - The ability of such services to meet current and future demand.

- 1.6 The review highlighted that the number of households approaching the council as homeless (or at risk) doubled in a two-year period, driven by:
- An increasingly inaccessible private rental market,
  - An increase in reports of domestic abuse,
  - An increase in families seeking help, and
  - An increase in homeless presentations for people in some form of employment.

### **Homelessness & Rough Sleeping Strategy 2024-2029**

- 1.7 Following the review, and between April and June 2024 council officers conducted work to develop the Homeless and Rough Sleeping Strategy. Overall, 118 people contributed towards the development of the strategy, including at least 27 people with lived experience of homelessness. Others included: council staff across several departments; Councillors; local partners including charities, statutory agencies and housing providers. A public survey was promoted on the Council's website and other social media channels and received 28 responses.
- 1.8 The strategy provides **a framework for responding to homelessness in the borough**. As such, the actions laid out in the strategy are not exhaustive. There is much good work being carried out within the partnership that already fits within the framework (as laid out in part four of the Homelessness Review) and that we expect to continue in line with the partnership's vision, values and key strategy aims.
- 1.9 As a framework, the strategy is designed to respond flexibly to unexpected challenges beyond the partnership's control. The strategy was developed during a pre-election period, which culminated in a change in national government. This in turn may result in a shift on national government policy, a change in funding structures, and a set of national priorities.
- 1.10 Regardless of the impact of the July 2024 General Election, the action plan will be updated regularly by the Strategy Implementation Partnership in response to emerging priorities and available resources.
- 1.11 The Strategy consists of five key themes which are consistent with the 'whole system' approach of the national rough sleeping strategy (Ending Rough Sleeping for Good, DLUHC, September 2022). They are as follows:
- **Prevention** – to prevent homelessness from happening in the first place.
  - **Intervention** – to ensure that people who are homeless are identified quickly and placed into suitable cost-effective accommodation as where necessary

- **Accommodation** – to provide good quality accommodation as a central tool to ending homelessness.
- **Recovery** – to help people avoid a return to homelessness and to address the underlying issues that led to them losing their home.
- **Systems and Service Culture** – to ensure that our good work and innovative services are underpinned by comprehensive, positive and effective structures and partnerships.

1.12 The Strategy 2024 to 2029 was presented to the Homelessness & Housing Delivery Task Group on 9<sup>th</sup> July 2024 and to the Environment and Community Panel on 16<sup>th</sup> July 2024.

### **Monitoring & Evaluation**

1.13 We will record and monitor our progress against a set of data indicators. Full details of the indicators are set out on page 42 of the Strategy. Additionally, the following new measures will be introduced to ensure that homeless applicants' voices are heard:

- A customer feedback button (“how did we do?”) at the foot of standard emails from the Housing Needs Service, linking to a brief survey about their experience.
- A quarterly review of any complaints received to the Housing Needs Service, with a record kept of lessons learnt and remedial action taken.
- A clear interface between the work of the council and the work of the newly formed coproduction group.

1.14 Progress against the actions in the Strategy will be reviewed at least once every three months at the Homelessness Strategy Implementation Group meeting (partnership meeting), with key successes and challenges reported to the Homelessness and Housing Delivery Task Group on a quarterly basis. An annual report to the council's Environment and Communities Panel, outlining progress and updating the plan to reflect any changes in circumstance.

### **Housing and Homelessness Delivery Task Group**

1.15 Senior officers presented the strategy in a briefing to members of the Homelessness and Housing Delivery Task Group on Tuesday 9 July.

### **Environment and Communities Panel**

1.16 Subsequently, senior officers presented the strategy to the Environment and Communities Panel on Tuesday 16<sup>th</sup> July. The outcome was as follows:

*“**RESOLVED:** That the 2024-2029 Strategy is adopted and that the role of the Environment and Community Panel group - Homelessness and Housing Delivery Task Group in overseeing the delivery of the Action Plan within the strategy was endorsed.”*

## **2. Options Considered**

2.1 There is no option to consider as under the Homelessness Act 2002, all housing authorities are required by law to produce a Homelessness and Rough Sleeping Strategy once every five years.

2.2 The approach taken builds on the latest best practice including a co-production approach, engaging with people with lived experience of homelessness. This represents a new way of working in preparing the Strategy.

### **3. Policy Implications**

3.1 There are actions identified in the Strategy that will have policy implications for the Council. Of particular importance will be any policy change proposals following a review of the Social Housing Allocations policy. A further policy implication relates to the review/redesign of the homelessness prevention grant scheme for individuals. Further details on these areas of work will be brought back to future Cabinet meetings to agree.

3.2 As laid out in more detail in the Equalities Impact Assessment, the strategy links clearly with the council's own Corporate Strategy, particularly in terms of:

- **Supporting our communities** – preventing homelessness and encouraging people to thrive in the borough.
- **Promoting growth and prosperity** – creating new, good quality housing and nurturing job opportunities for people with lived experience of homelessness.
- **Effective and efficient delivery of services** – reducing spend on emergency accommodation and managing externally delivered contracts more effectively.

3.3 The strategy has been developed alongside the council's emerging Local Plan and Economic Plan.

### **4. Financial Implications**

4.1 It is proposed that the Council utilises some of the funding it receives from Central Government, ringfenced for Housing Services, to support actions in the strategy. The Homelessness Prevention Grant (HPG) that Council receives annually from Central Government specifies that it is to be used 'in maximising wider prevention of homelessness activities and reducing reliance upon temporary accommodation'. The Strategy sets out how we will do this.

4.2 This funding alone will not be enough to support all actions and activities within the strategy. We will continue to maximise funding opportunities presented by Central Government. Whilst an annual budget is set, it is important to state that strategy, policy and decision-making processes are made within the context of the statutory responsibility and accountability the council has in relation to homelessness prevention. The budget for this work is therefore subject to review and is influenced by the award of ring-fenced government funding, and primarily demand for the services including costs associated with emergency accommodation.



- 4.3 It is important to note that the Strategy has been prepared a time where there is no certainty relating to future central government funding for homelessness services. Therefore, it has been costed on a likely 'worst case scenario' basis as set out at section A1.5 of the Strategy. An implication of not having funding to support all activities in the strategy is that we could see a rise in B&B, temporary accommodation costs. Whilst the strategy seeks to address this, it relies upon central government funding.

## 5. Personnel Implications

- 5.1 The Strategy includes a detailed action plan, outlining how we intend to deliver the strategy's aims. Any new activities or roles may be absorbed within existing roles or funded through the ring-fenced Homelessness Prevention Grant.

## 6. Environmental Considerations

- 6.1 None

## 7. Community Considerations

- 7.1 The strategy has been developed at a time when the council and partners have begun work towards establishing West Norfolk as a Marmot Place – as a partnership, improving the health and wellbeing outcomes of all residents.

- 7.2 The delivery of the strategy and further decision making and development of some of the proposals set out in the Strategy will be made in the context of the forthcoming work on becoming a Marmot Place and will reflect its principles, particularly (with reference to the Action Plan on pages 31-41 of the Strategy):

- **Enabling all children, young people and adults to maximise their capabilities and have control over their lives** – the “recovery” strand aims to enable formerly homeless people to thrive in the borough
- **Creating fair employment and good work for all** – strands 4.4 and 4.5 encourage employment and meaningful activity for formerly homeless people
- **Ensuring a healthy standard of living for all** – strands 4.1 to 4.3 tackle health exclusion for people experiencing homelessness
- **Creating and develop healthy and sustainable places and communities** – strands 1.9 to 1.11 encourage the development of homelessness prevention services in accessible community locations
- **Tackling racism, discrimination and their outcomes** – the whole strategy focuses on improving the pathway for vulnerable households facing or experiencing homelessness.

- 7.3 The Equalities Impact Assessment sets out the positive implications of the strategy for people with protected characteristics who are experiencing homelessness or at risk.
- 7.4 The Strategy has been developed in partnership with local services who support people who are homeless or at risk. While the Council retains responsibility as lead partner, all local services play a part in the effective delivery of the strategy. Some local partners have already begun to shape their own strategies to fall in line with the key themes outlined in the document.

## **8. Statutory Considerations**

- 8.1 Homelessness Prevention activities and the publication of a Homelessness Strategy are a statutory requirement. The scope and content of the Strategy is prescribed in the Ministry for Housing, Communities and Local Government (MHCLG) Homelessness Code of Guidance for Local Authorities, as well as in part 1 of the Homelessness Act 2002.
- 8.2 The Strategy also considers the implications of the 1999 Local Government Act, in terms of delivering Best Value for the services it procures and delivers. This includes a focus on reducing emergency accommodation costs, as well as ensuring that externally delivered contracts are procured and managed efficiently.

## **9. Equality Impact Assessment (EIA)**

- 9.1 Pre-Screening and full EIA attached.

## **10. Risk Management Implications**

- 10.1 As referred to above the strategy has been developed at a time where there is no certainty relating to future central government funding for homelessness services. The Housing team will maintain a risk register alongside the Strategy and action plan to monitor threats to delivery. Full details of the threats to delivery are set out in section A1.6 of the Strategy.
- 10.2 Following the 2024 General Election, any changes that would impact on the Strategy from a national policy perspective will be monitored and potentially amendments made.

## **11. Declarations of Interest / Dispensations Granted**

None

## **12. Background Papers**

- Homelessness: a Review. February 2024 (BCKLWN)
- Homelessness and Rough Strategy 2019-2024 (BCKLWN)
- Ending Homelessness Person by Person: The King's Lynn and West Norfolk Homelessness and Rough Sleeping Strategy (Draft) 2024-2029 (BCKLWN)

**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 Strategy – Actions identified that will have future policy implications				
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	Homelessness Prevention activities and the publication of a Homelessness Strategy are a statutory requirement (Housing Act 2002). The scope and content of the Strategy is prescribed in the MHCLG Homelessness Code of Guidance for Local Authorities.				
<b>Question</b>	<b>Answer</b>				
<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 <b>according to their different protected characteristic</b>, 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><b>2.</b> 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><b>3.</b> Could this policy/service be perceived as impacting on communities differently?</p>	Yes	
<p><b>4.</b> Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	Yes	To ensure that the Council fulfils its statutory duties in relation to homelessness
<p><b>5.</b> 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><b>Actions:</b> N/A</p> <hr/> <p><b>Actions agreed by EWG member:</b></p> <p>.....</p>
<p><b>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:</b></p> <p>A full impact assessment will be undertaken in advance of the Strategy being considered by Cabinet in September 2024.</p> <p><b>Decision agreed by EWG member:</b> .....Claire Dorgan...(5/7/2024).....</p>		
<p><b>Assessment completed by:</b></p> <p><b>Name</b></p>	<p><b>Nikki Patton</b></p>	
<p><b>Job title</b></p>	<p><b>Housing Services Manager</b></p>	
<p><b>Date</b></p>	<p><b>4<sup>th</sup> July 2024</b></p>	

# **ENDING HOMELESSNESS, PERSON BY PERSON**

The King's Lynn and West Norfolk  
Homelessness and Rough Sleeping Strategy  
2024-2029

[picture to follow]

**DRAFT – NOT FOR DISTRIBUTION**



# CONTENTS

## Foreword – Cllr Jo Rust, Cabinet Member for People and Communities

### PART A: Introduction, vision and values

#### A1: Introduction

- [A1.1 Setting the Scene](#)
- [A1.2 The Story So Far – Homelessness Review](#)
- [A1.3 Developing Our Strategy – Methodology](#)
- [A1.4 Scope](#)
- [A1.5 Funding](#)
- [A1.6 Threats to delivery](#)

#### A2: Vision

- [A2.1 Our Vision](#)
- [A2.2 In Practice](#)

#### A3: Values and Behaviours

- [A3.1 Our Values and Behaviours](#)
- [A3.2 In practice](#)

### PART B: Strategy in detail

#### B1: Prevention

- [B1.1 Education and communication](#)
- [B1.2 Client centred prevention services](#)
- [B1.3 Community Links](#)
- [B1.4 Grants and Incentives](#)
- [B1.5 Partnerships and Data](#)

#### B2: Intervention

- [B2.1 Accommodation](#)
- [B2.2 Support](#)
- [B2.3 Partnerships](#)

#### B3: Accommodation

- [B3.1 Single Person Accommodation](#)
- [B3.2 Private Rented Sector](#)
- [B3.3 Social Housing and Other Accommodation](#)

#### B4: Recovery

- [B4.1 Health and substances](#)
- [B4.2 Community](#)
- [B4.3 Sustainment](#)

#### B5: Systems Support and Service Culture

- [B5.1 Partnerships and Staffing](#)
- [B5.2 Lived Experience and Co-Production](#)
- [B5.3 Communication](#)

### PART C: Action plan

#### C1: Prevention

#### C2: Intervention

#### C3: Accommodation

#### C4: Recovery

#### C5: Systems Support and Service Culture

#### How will we measure success?

#### Get involved

# FOREWORD

## **Cllr. Jo Rust, Cabinet Member for People and Communities**

The King's Lynn and West Norfolk Homelessness and Rough Sleeping Strategy is titled "Ending Homelessness, Person by Person". It puts people first and foremost.

The strategy recognises the need for support and, most importantly, a secure roof over each person's head. It has been developed alongside people who have lived experience of homelessness and rough sleeping. It fully integrates people's voices into what we plan to do and how we plan to do it.

It is a 'live' document that won't gather dust, but that will act as a framework for the next five years.

We recognise the huge efforts that have been taken to reduce rough sleeping, the most visible form of homelessness, in the borough. But we also recognise our new set of challenges, many of which are hidden from sight.

Hidden homelessness includes families living in temporary accommodation. We don't want local children to face the uncertainty of not knowing if they're going to have a space to do their homework or the stability to sustain friendships. We seek to move families into safe, sustainable tenancies where children can grow and thrive. Crucially, we will further develop services and systems to avoid them needing temporary accommodation in the first place. Our strategy aims to provide housing security for residents of all ages, contributing to them being able to live life to its fullest potential.

As a council – a public body with a legal responsibility to respond to homelessness – we recognise how we can improve the services that we offer. The staff that deliver these vital services have my thanks for the work that they do and for the way they continue to develop their offer for the people that they serve.

This strategy doesn't set out every single action that we need to take but sets the tone for the way that we will deliver these services: with care, compassion and an intention to end homelessness, person by person.

I hope that you will be able to support the work to deliver this strategy, whether as an employer who provides mentorship and employment support to someone with lived experience, a landlord who will work with us to keep a family in a tenancy, or a partner organisation working with us to provide crucial services.



# PART A: INTRODUCTION, VISION AND VALUES

## A1 INTRODUCTION

### A1.1 Setting the Scene

The council published its last Homelessness and Rough Sleeping Strategy in January 2020. The strategy document was illustrated heavily with images that members of the public might associate with homelessness: abandoned mattresses, tent encampments, and sheds that people were sleeping in. When the strategy was written, West Norfolk was responding to an all-time peak in rough sleeping, the most visible form of homelessness.

We are in a different place as a borough<sup>1</sup>. There has been a sustained and successful partnership effort to reduce instances of rough sleeping locally. Looking forward, though, we have a different, less visible set of challenges.

Homelessness in the borough is largely hidden, but the volume of households approaching the council as homeless has doubled since the COVID pandemic. Levels of rough sleeping in the borough are comparatively low<sup>2</sup>, but there are people in the borough who are neither street homeless nor adequately housed. Services exist to help prevent homelessness, but we don't always get to people early enough.

Harvard Business Review describes strategy as:

***“An integrative set of choices,  
that positions you on a playing field of your choice,  
in a way that you win.”<sup>3</sup>***

The 2024-2029 Homelessness and Rough Sleeping Strategy has been developed with this definition in mind. It is *integrative*, in that it relies on systems, services and resources beyond those of the council's housing teams. It is *a set of choices*, made by a partnership of people who have chosen to use their collective skills and energy to support local people in housing need. And it doesn't merely set its sights towards each individual organisation “doing its thing well”. It is a tactics sheet that considers and addresses the likely barriers it will face, making the most of the resources available.

The strategy doesn't play out every move, but it establishes key principles and priorities that can be used as a basis for the borough's response over the next five years.

In short: this document describes a shared vision towards ending homelessness in the borough, along with measurable steps towards achieving the vision.

### A1.2 The Story So Far – Homelessness Review

During the autumn and winter of 2023/24, the council conducted a Homelessness Review, to examine:

---

<sup>1</sup> In this document “the borough” refers to King's Lynn and West Norfolk as a whole – including partners working with people who are homeless or at risk of homelessness - as opposed to the Borough Council of King's Lynn and West Norfolk.

<sup>2</sup> Compared with other districts in the region, the average total monthly rough sleepers per 100,000 population was one of the lowest. See [BCKLWN – Homelessness: A Review](#), section 3.5 'Rough Sleeping'.

<sup>3</sup> Harvard Business Review, 2023. A Plan Is Not A Strategy. Available at: <https://www.youtube.com/watch?v=iuYIGRnC7J8>

- The current and predicted future levels of homelessness in the borough,
- The available provision of services for people experiencing or facing homelessness,
- The ability of such services to meet current and future demand.

The review highlighted that the number of households approaching the council as homeless (or at risk) doubled in a two-year period, driven by:

- An increasingly inaccessible private rental market,
- An increase in reports of domestic abuse,
- An increase in families seeking help, and
- An increase in homeless presentations for people in some form of employment.

The document outlined the broad range of services available to support homeless households (and those at risk of homelessness). It concluded that:

*“There is a clear focus on prevention within the partnership, with some strong results, but the effectiveness of the partnership towards homelessness prevention appears to be ebbing away due to significant external influences.”*

*“There is a strong and varied ‘off-the-street’ offer to people sleeping rough or at risk, but the cost of accommodating homeless households is unsustainably expensive.”*

*“The partnership has benefitted from the impact of new services across the pathway, but many of these services are vulnerable to future reductions in central government funding.”*

*“There are strong informal partnerships between services, but the partnership would benefit from a stronger “whole system” vision, bringing in a wider net of service.”*

*“Services were able to identify some strong individual outcomes, and some good work towards building services around service users, but there is still a clear gap between some key services and the people that they serve.”*

The review was presented to external partners and elected members and was endorsed publicly in April 2024<sup>4</sup>.

### **A1.3 Developing Our Strategy - Methodology**

The Homelessness Review laid a foundation for developing a homelessness and rough sleeping strategy. As written in the review, *“it is like the first act of a play, setting the scene, leaving questions unanswered”*. The review formed the basis of the council’s strategy development work, which was conducted between April and June 2024.

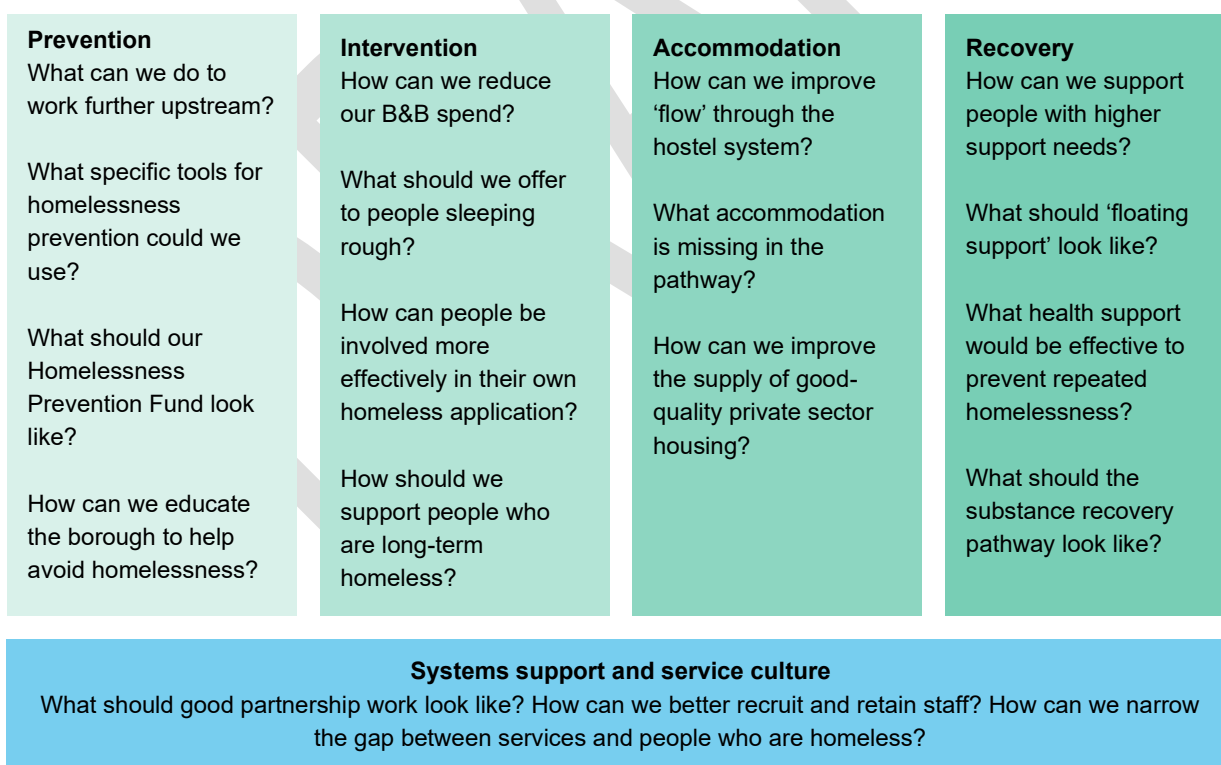
Overall, 118 people contributed towards the development of the strategy, including at least 27 people with lived experience of homelessness.

<sup>4</sup> [BCKLWN Homelessness Review 2024 - draft.pdf \(west-norfolk.gov.uk\)](#)

This included:

- **Sessions with council staff and members:** housing staff, as well as other council departments who play an important part in preventing and relieving homelessness – plus a session with the Homelessness and Housing Delivery Task Group.
- **Sessions with local partners:** we were pleased to welcome over 30 local partners to two sessions at the King’s Lynn Town Hall. As well as homelessness charities and housing providers, partners attended from mental health services, social care, social prescribers, probation, police, substance recovery, advice services, domestic abuse services and key local charities.
- **Sessions with people with lived experience of homelessness:** we carried out development sessions at The Purfleet Trust and the King’s Lynn Night Shelter, with just under 20 people with lived experience of homelessness attending across the two sessions.
- **A public survey:** we received 28 responses to a public survey that was promoted on the council’s website, on social media and in local news outlets. These included eight responses from people who declared that they were homeless or at risk (or had been homeless in the past).

We encouraged participants to contribute ideas around five themes:



These themes have been developed from (and informed by) a framework within the national Rough Sleeping Strategy, published in 2022<sup>5</sup>.

<sup>5</sup> [Ending rough sleeping for good - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/ending-rough-sleeping-for-good)

We also asked participants to describe their vision (and hopes) relating to homelessness prevention in the borough, and their views as to how the partnership should work. In the sessions with people with lived experience of homelessness, we asked participants how they would like to be treated by services supporting them. Their answers have been used to develop several of the ideas underpinning this strategy.

**We would like to thank the following organisations for contributing towards the creation of this strategy:**

Access Community Trust	Money Advice Hub
Broadland Housing Association	NHS Norfolk & Waveney Integrated Care Board
Change, Grow, Live	Norfolk Constabulary
Freebridge Community Housing	Norfolk County Council
Headway Norfolk and Waveney	Sanctuary Supported Living
HM Prison and Probation Service	Shelter
Home Group	The Benjamin Foundation
King's Lynn Foodbank	The Bridge for Heroes
King's Lynn Night Shelter	The Purfleet Trust
Leeway Domestic Violence and Abuse Services	West Norfolk Coastal Primary Care Network
MAP Norfolk	

#### **A1.4 Scope**

This strategy provides a **framework for responding to homelessness in the borough**. As such, the actions laid out in the strategy are not exhaustive. There is much good work being carried out within the partnership that already fits within the framework (as laid out in part four of the Homelessness Review) and that we expect to continue in line with the partnership's vision, values and key strategy aims.

As a framework, it is designed to respond flexibly to unexpected challenges beyond the partnership's control. The strategy was developed during a pre-election period, which may culminate in a change in national government. This in turn may result in a shift on national government policy, a change in funding structures, and a set of national priorities.

Regardless of the outcome and impact of the July 2024 General Election, the action plan will be updated regularly by the newly formed Strategy Implementation Partnership (see [B5.1](#)) in response to emerging priorities and available resources.

#### **A1.5 Funding**

This strategy has been developed at a time where there is no certainty relating to future central government funding for homelessness services. Therefore, it has been costed on a likely 'worst case scenario' basis, as follows:

- The DLUHC Rough Sleeping Initiative<sup>6</sup> ceases in March 2025 and is not replaced.
- The DLUHC Rough Sleeping Accommodation Programme<sup>7</sup> ceases in March 2025 and is not replaced.

---

<sup>6</sup> [Rough Sleeping Initiative: 2022 to 2025 funding allocations - GOV.UK \(www.gov.uk\)](#)

<sup>7</sup> [Rough Sleeping Accommodation Programme 2021-24 - GOV.UK \(www.gov.uk\)](#)

- The DLUHC Homelessness Prevention Grant<sup>8</sup> reduces significantly from 1 April 2025.
- The council relies on ringfenced central government homelessness funds to commission services.
- No cuts are made to the council's 'core budget' for housing needs and allocations.

Due to uncertainty around central government funding for activities set out in the strategy, we have been conservative around how much funding will be available. We have therefore planned activities prudently at this stage. The strategy and action plan outlines where (a) we can commit to funding, and (b) where we will seek funding towards strengthening a particular strategy aim. Any new services included in the strategy will be commissioned for a minimum of three years.

## A1.6 Threats to delivery

Alongside the strategy and action plan, we will maintain a Risk Register outlining the key threats to delivery. Key potential risks and threats include:

- **A change in policy direction / funding** because of a new government, meaning that we could not afford (or were not permitted) to deliver in line with the strategy.
- **An end to Rough Sleeping Initiative funding** which could limit the scope of our strategic objective.
- **An increase in homelessness presentations** which could outstrip the supply of emergency and move-on accommodation and increase the council's Bed and Breakfast / nightly-paid<sup>9</sup> accommodation costs.
- **Recruitment and retention issues** for key partners including the council, impacting on the ability to mobilise and deliver strategic aims.
- **A lack of buy-in from partners** regarding the strategic aims, impacting on the effectiveness of the strategy.

Senior managers within the Council will update the risk register regularly and present key issues to the Homelessness and Housing Delivery Task Group.

---

<sup>8</sup> [Homelessness Prevention Grant: 2023 to 2025 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/homelessness-prevention-grant-2023-to-2025)

<sup>9</sup> Nightly-paid accommodation includes accommodation where individuals have access to their own cooking and washing facilities (as opposed to a traditional B&B set-up)

## A2 VISION

*“My hope is that there would be an end to homelessness. I would like the future to look hopeful. A future where every person has a safe and private place to lay their head.” – survey respondent*

*“Anyone who wants a home should be able to have one.” – survey respondent*

*“What would I like the future to look like for me? Just to have a future.” – group participant.*

### A2.1 Our Vision

Put simply, our vision is:

**ENDING HOMELESSNESS, PERSON BY PERSON**

This means that we are aiming for a future where we:

**Prevent homelessness where possible.**

**Provide accessible, immediate help in a crisis.**

**Deliver a pathway of good, sustainable accommodation for all.**

**Build personal strength, resilience and independence.**

**Deliver everything in partnership.**

As described in the Homelessness Review, many services in the borough are already set towards this vision. However, this strategy sets out to address the gaps and challenges identified in the review.

### A2.2 In Practice

As part of the development of this strategy, we discussed at length whether we should include “ending homelessness” in our vision. We considered whether to adopt a vision that may not be achievable within the lifetime of the strategy, if at all. We reflected that there are many uncontrollable factors that create homelessness. And we reflected upon the risk of creating ‘mission fatigue’ if we set our vision towards something that may be many years away from being achieved.

However, we concluded that:

- **We should set our sights towards ending homelessness.** As services, we want to achieve more than “delivering our service well”. We should avoid creating an environment where we perpetuate the need for services that people should never have to access in the first place.
- **We should measure, recognise and (where appropriate) celebrate progress** towards ending homelessness. By ending homelessness, person by person, we recognise the person-centred efforts of frontline workers, as well as the role played by people experiencing homelessness in working towards their own recovery.

## A3 VALUES AND BEHAVIOURS

*“I think that being kind and supportive towards people is key and [is] something that can be done without cost. In addition, being able to explain the system in a way that is understandable, and being patient with helping people understand, will help with transparency, as well as setting expectations for service users and staff.” – survey respondent.*

*“[Be] person-centred, personal, informed. [Place an] emphasis on choice. Simple actions can have huge impact e.g. space to talk, time for people to express how they feel” – group participant.*

*“[Treat me with] respect and dignity: as a human being and not a number.” – group participant.*

### A3.1 Our Values and Behaviours

During the process of developing the strategy, much of the discussion focused on *how* we do things, rather than what we do. This is consistent with the tone of the Homelessness Review. The borough has an impressive range of services dedicated to supporting homeless people<sup>10</sup>, but some of the key challenges identified related to how we communicate with people experiencing homelessness, how we work in partnership with one another, and how quickly we intervene to prevent a crisis from escalating.

In our development meetings, we discussed the importance of identifying behaviours – the practical outworking of our values – so that our values are framed authentically and accountably. This is reflected in the five statements below.

### A3.2 In practice

The table below reflects the central themes shared by partners, survey respondents and people with lived experience of homelessness.

Value	What this looks like	Notes
<b>Dignity</b>	We will treat people with dignity and compassion, in the light of current and past traumas.	This was the biggest theme emerging from discussions with people with lived experience of homelessness. Many homeless applicants have experienced multiple layers of trauma – our approach must be informed by this.
<b>Transparency</b>	We will make it clear why we are doing things, what we’re doing, what people can expect and how it’s going.	As a partnership, we make difficult decisions on how to manage limited housing and support resources. These decisions need to be transparent. As one respondent stated, “ <i>we appreciate you can’t please everyone, but we at least need to understand your reasons.</i> ” We will be up-front and clear about our performance in key areas.

<sup>10</sup> This report may use the term “homeless people” to cover people who are currently experiencing homelessness, those at risk of homelessness, and those who are recovering from an experience of homelessness.

<b>Flexibility</b>	Where we can, we will work services flexibly around the needs of an individual.	Our services need to be underpinned by clear processes and principles to provide a fair service. However, processes should be sufficiently flexible to ensure that people (especially those facing multiple disadvantage) are able to access them.
<b>Collaboration</b>	We will work with each other to get the best results.	As part of this, we will be curious: we will listen and be prepared to learn from each other, wherever we are in the partnership.
<b>Empowerment</b>	We will enable people to engage in, shape, and benefit fully from the services they use.	We will design services in a way that enables people to develop 'social capital' – positive connections with others in the borough, beyond the network of services explicitly designed to address homelessness. We will ensure that the voices of people with lived experience are central to the development of services.

**We acknowledge that values and behaviours take time to develop and be embedded,** but we will develop our services in line with these principles.

DRAFT



# PART B: STRATEGY IN DETAIL

## B1 PREVENTION

### Overall aim

Prevention is perhaps the most important strand of the 2024-2029 Strategy. To end homelessness, we need to prevent it happening in the first place. Homelessness prevention should go beyond identifying people at the 'crisis' stage, where our chances of success in a 56-day period are limited.

The Homelessness Review identified that, whilst the council is more effective at prevention than it was five years ago, its effectiveness has ebbed away because of significant external pressures.

This strand aims to:

**Ensure that, where possible, a person at risk of homelessness does not become homeless.**

**Identify at-risk groups and individuals as early as possible.**

**Support “universal” measures that will reduce the risk of homelessness for all residents.**

### B1.1 Education and communication

#### WHY?

During the strategy development sessions, participants suggested that some members of the public, and some public-facing services, lack confidence to support and signpost people who are at risk of homelessness. Recent public campaigns around safeguarding, domestic abuse and mental health demonstrate that it is possible to change public perceptions of (and responses to) social issues.

#### WHAT WILL THIS INCLUDE?

We will develop a clear and universal, proactive, **borough-wide education plan** around homelessness prevention. Mirroring other public campaigns, this will communicate central messages as widely as resources allow, including to schools, GPs, faith groups, local employers and businesses.

Alongside the education plan, we will develop an online “**early help portal**” for homelessness prevention. Rather than waiting for situations where a referral *must* be made, the portal will encourage early help, linked with the partnership’s existing Early Help Hub. An accessible online portal will accompany this, but consideration will be given to groups who may struggle to access online content.

We will also develop a **proactive campaign with letting agents** towards homelessness prevention. This strand will focus specifically on informing and supporting local letting agents, to identify at-risk tenants before crisis stage. A new role will be created to support this work (see strands [B1.4](#) and [B3.2](#)).

## B1.2 Client-centred prevention services

### WHY?

Although many people will be able to avoid homelessness independently, some will require support through the process. For people who are facing homelessness because of money problems, there are certain remedies (such as Debt Relief Orders) that can only be accessed through a qualified debt adviser.

We choose to work in partnership with local providers, to give people the widest range of support and expertise possible.

### WHAT WILL THIS INCLUDE?

The council has recently commissioned a new **information, advice and guidance contract** – held by Citizens Advice Norfolk and Shelter – covering money advice, income maximisation and housing. We will work closely with both partners to ensure that all opportunities for homelessness prevention are maximised, and that the service coordinates well with other prevention services.

Linked to this, the council (alongside Norfolk County Council) has co-commissioned the **Sustainable Housing Pathways Service (SHPS)** – a homelessness prevention service – for a further year. This year, the service has developed to receive referrals further ‘upstream’, particularly from individuals identified by Social Services.

We will work with SHPS to ensure that there is enough ‘flex’ to work further upstream where possible, maximising the service’s chance of success.

During the COVID pandemic, the council’s **home visiting function** for households at risk of homelessness ceased. Since then, the service has been unable to reinstate the function due to staff shortages and increased homelessness applications. We will aim to reinstate the function with a particular focus on preventing family/parental evictions.

Since 2022, the council (through central government funding) has commissioned an **Intensive Support Service** – currently delivered by the Purfleet Trust – focused on people who are sleeping rough or at risk of sleeping rough. We will aim to redesign and recommission this service when the current funding ends in 2025.

We plan to extend the new service to provide targeted support to families, with a firm emphasis on prevention, as well as those who are neither at risk of rough sleeping nor adequately and sustainably housed.

## B1.3 Community Links

### WHY?

We need to provide every opportunity for the public to learn what we do, so that people at risk of homelessness can access advice as early as possible. There are multiple existing venues and platforms that could be used to spread the word.

## WHAT WILL THIS INCLUDE?

**Shared sites** such as the forthcoming Multi-Use Community Hub present an excellent opportunity to promote services and maximise opportunities for homelessness prevention. We will work closely with delivery partners to ensure that services are co-located and easily accessible.

We will also ensure that homelessness prevention services are **accessible to rural communities**. We will work with local parishes and community contacts (making good use of existing communication channels) to achieve this. We will explore working with local partners such as West Norfolk Community Transport where travel costs are a barrier to accessing support.

The Homelessness Review identified a relative shortage of services for families facing homelessness, who represent a growing proportion of people approaching the council for assistance. We will ensure that prevention activities have a **specific remit towards families**, based in the community. Existing partnerships and networks provide a strong opportunity to promote homelessness prevention.

### B1.4 Grants and Incentives

#### WHY?

The cost to the state of a homeless person is estimated to be £20-£30,000 per year<sup>11</sup>. A pragmatic, strategic “spend to save” approach will enable us to reduce the cost of emergency accommodation, as well as achieving wider savings to the public purse.

#### WHAT WILL THIS INCLUDE?

We will work with **private rented sector (PRS) landlords** to reduce homelessness arising from the end of PRS tenancies. We will create a flexible, early intervention fund to support landlords where eviction could be avoided, linking PRS tenants with support services to address underlying support needs.

We will explore creating a new strategic, enabling role, bringing together multiple PRS liaison functions across internal and external partners, and encouraging positive engagement with PRS landlords and letting agents.

Linked to this, we will **redesign our grant scheme for individuals** to better meet the needs of households at risk of homelessness. The scheme will have a wider scope, greater flexibility, a clearer application process and more explicit links with other services.

We will explore the possibility of opening the scheme to “match funding”, so that individuals’ compassion towards homeless households can be harnessed to prevent homelessness (and prevent repeated instances). This enables members of the public, local businesses and charitable organisations to work together, provide funding to support individuals facing (or recovering from) homelessness<sup>12</sup>.

Working with the Benefits team, we will explore carrying out **a review of regular Discretionary Housing Payment (DHP) recipients**, to maximise the effectiveness of DHPs for the purpose of

---

<sup>11</sup> [Cost of homelessness | Crisis UK | Together we will end homelessness; Ending homelessness isn't just morally right, it's cost-effective \(connection-at-stmartins.org.uk\)](#)

<sup>12</sup> The [Street Aid](#) model (launched in Cambridge and now operational in other cities such as Norwich and York) provides one example of how public generosity can be harnessed effectively.

homelessness prevention. We will improve joint-working and signposting, where there is a clear housing need that has been masked by DHP use.

## **B1.5 Partnerships and Data**

### **WHY?**

A partnership-led approach is crucial to preventing homelessness. We rely on people across the borough to be the 'eyes and ears' in the community, ensuring that people are supported and encouraged to seek early help. We need to underpin our approach with clear, accessible data, to identify individuals and groups at particular risk of homelessness.

### **WHAT WILL THIS INCLUDE?**

We will **develop a homelessness champion function** to be rolled out borough-wide to all interested services and settings. We will model this on existing safeguarding and domestic abuse champion roles, also learning from the 'mental health first aider' model<sup>13</sup>.

Ultimately, the aim is for at least one person in every public setting (school, hospital department, major employer, faith group and so on) to have a good knowledge of homelessness services and support and be able to direct colleagues and customers for support. Initially though, the function will focus on settings most likely to identify people at risk of homelessness.

Improved data collection, analysis and data presentation forms an integral part of delivering the objectives of the strategy, as well as forming a condition of the council's annual homelessness prevention grant<sup>14</sup>. In response, we have recently appointed a new **Housing Data Analyst**, covering a wide range of functions within the department but with a focus on improving the quality of homelessness data, partnership wide.

The post will monitor and evaluate housing data to help improve performance, and to support the commissioning of appropriate services, in line with service demand. We will embed this new role to better identify people at risk of homelessness.

---

<sup>13</sup> [Mental health training online and face to face](#) · MHFA England

<sup>14</sup> The government has proposed changes to how the [Homelessness Prevention Grant](#) is calculated, which are due to take effect in 2025. Robust and accurate data is critical in ensuring the Council receives the correct funding allocation to support key homelessness services.

## B2 INTERVENTION

### Overall aim

This strategy aims to prevent homelessness wherever possible. However, even with the best efforts of the partnership, there will be occasions where we cannot avoid homelessness – such as a family fleeing domestic abuse, or an individual migrating to the borough from elsewhere.

In these emergency situations, we aim to provide a rapid, dignified and cost-effective service, assessing individuals' needs and addressing the factors contributing to a small number of repeated homelessness presentations.

This strand aims to:

**Ensure that people who are homeless are identified quickly and placed into suitable, cost-effective accommodation where necessary.**

**Avoid and reduce the use of Bed and Breakfast and nightly-paid accommodation.**

**Ensure that support is provided to overcome barriers to accessing (and sustaining) emergency accommodation.**

### B2.1 Accommodation

#### WHY?

At present, the cost of accommodating homeless households is at an all-time high. More importantly, there is a profoundly negative impact on individuals' wellbeing of staying in emergency accommodation. Whilst we have developed good relationships with local providers locally and keep out-of-area placements to a minimum, bed and breakfast and nightly-paid accommodation is regarded in national guidance as a 'last resort'<sup>15</sup>.

Additionally, the welfare cabins, procured by the council to accommodate people sleeping rough during the COVID-19 pandemic, are unsustainably expensive to manage.

#### WHAT WILL THIS INCLUDE?

As part of our strategy, we will work towards **commissioning and designing sufficient emergency accommodation to meet need**. Our Housing Strategy team will lead this work, developing accommodation in line with the volume of homeless applicants and likely future demand<sup>16</sup>. We will develop and procure any new accommodation in sustainable locations and ensure it is cost-effective for the council.

<sup>15</sup> Homelessness Code of Guidance 16.30 <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-16-securing-accommodation>

<sup>16</sup> This information will be gathered by the new Data Analyst post (see [B1.5](#)).

To support this objective, the council is currently working with Broadland Housing Association to deliver seven units of temporary accommodation in Reid Way, King's Lynn in the next two years, and with West Norfolk Housing Company to deliver another seven units in Fairstead by September this year. All units will offer good quality emergency housing for homeless families, linked with support. This objective will link with work to **address the continued under-supply of new social housing in the borough.**

As a council, we will ensure planning policy mechanisms are in place to deliver new affordable housing in line with need. We will monitor and respond to any national policy changes in relation to increasing the supply of housing – particularly new opportunities arising from future changes to the National Planning Policy Framework. We will also continue to work with Housing Providers to maximise opportunities for investment-led affordable housing schemes in the borough.

The council's two wholly owned Housing Companies will continue to support the supply of suitable accommodation for households who are homeless or at risk. The **West Norfolk Housing Company**<sup>17</sup> will continue to be agile in responding opportunities that will assist the Council in meeting the priorities of the strategy, as it was during the COVID-19 pandemic and in response to the conflict in Ukraine.

The company cannot predict the potential interventions that could be needed but will only deliver interventions that align with the council's strategic objectives.

**West Norfolk Property**<sup>18</sup> was set up to provide high-quality accommodation in the private rented sector within the borough. The company currently lets 74 private rented homes in King's Lynn and has plans to increase this to 139 homes by 2028. West Norfolk Property offers three-year, fixed-term tenancies and is committed to providing exemplary customer service.

Over recent years, the council has been proactive in **responding to asylum and migration pressures** and will continue to do so as part of its strategy implementation. This has included the delivery of 29 homes, arising from rounds one and two of the Local Authority Housing Fund. The council will continue to take advantage of funding opportunities to meet demand, whilst seeking to manage the impact of any increased pressures on existing housing and homelessness systems.

As part of our emergency accommodation offer for those sleeping rough or at risk of sleeping rough, we will **design and commission emergency accommodation to replace the remaining four welfare cabins**. The cabins have proven a life-saving option for people who would struggle in a shared setting and who may have higher levels of support need.

We will work with partners and people with lived experience to design an offer that would suit this small group of people, who may be sleeping rough or at risk.

In general terms, we will **review our offer of accommodation to people sleeping rough**<sup>19</sup>. Following feedback from our development sessions, the offer should be clearly communicated and transparent to partner agencies. We will also review the effectiveness of the discretionary placements made for people sleeping rough and explore alternatives to the use of nightly-paid accommodation in such circumstances.

---

<sup>17</sup> [West Norfolk Housing Company – A registered provider of social housing \(wnhc.co.uk\)](http://wnhc.co.uk)

<sup>18</sup> [West Norfolk Property Limited – An independent private rental property company wholly owned by the Borough Council of King's Lynn & West Norfolk \(wnpl.co.uk\)](http://wnpl.co.uk)

<sup>19</sup> This relates to offers of accommodation to those who may be sleeping rough but may not be owed a legal duty to accommodate under s.188 Housing Act 1996 ([see Homelessness Code of Guidance ch. 15](#))

## B2.2 Support

### WHY?

We have processes in place to ensure that people facing immediate homelessness are accommodated and supported, but feedback tells us that we need to go further, particularly in terms of our communication with homeless applicants and partner agencies. Clear, empathetic communication will improve the effectiveness of the support provided during what can be a traumatic and unsettling experience.

### WHAT WILL THIS INCLUDE?

Firstly, we will **redesign and redevelop the Personal Housing Plans (PHPs)** issued by the council to homeless applicants. PHPs are intended as a two-way agreement between council and applicant, but since their introduction in 2018<sup>20</sup> they have not worked as effectively as intended. We will produce an easy-to-read document that can be used as a conversation starter and an ongoing support plan, exploring whether other partner agencies can amend and co-develop them.

We will also **develop a “what to expect” document for homeless applicants and partner agencies**, providing clear guidance as to what the housing needs service can do and what the service asks of others. We will develop this in partnership with a new “co-production group” (see [section B5.2](#)) to ensure that the advice given is clear to all.

We will make it clear how members of the public can help people sleeping rough. This will include improving the promotion of the national Streetlink<sup>21</sup> service – an online reporting tool, linked to local outreach services.

As part of our accommodation offer, we will **review the provision of basic items** to meet the need of all people who are living in emergency accommodation<sup>22</sup>. We will work with local homelessness charities to achieve this. We will aim to ensure that, where there is no alternative but to make an emergency accommodation placement, the placement is dignified and sustainable.

As part of our wider work to achieve Domestic Abuse Housing Alliance (DAHA) accreditation<sup>23</sup>, and linked to the countywide Domestic Abuse Strategy, we will **review the emergency offer (and processes) for victim-survivors of domestic abuse**. This will include reviewing emergency accommodation placements made for victim-survivors. We will review the use of DASH<sup>24</sup> forms to ensure that these are completed in a sensitive, trauma-informed manner.

As part of our wider accommodation review, we will explore further accommodation options for victim-survivors of domestic abuse who have wider support needs.

---

<sup>20</sup> Introduced under the Homelessness Reduction Act 2017. [Personal housing plans - Shelter England](#)

<sup>21</sup> [StreetLink - Connecting people sleeping rough to local services \(thestreetlink.org.uk\)](#)

<sup>22</sup> Note that some basic items are already provided to households by charities – this strand aims to ensure that there is a universal basic standard of provision for all occupants of emergency accommodation.

<sup>23</sup> Accreditation covers eight priority areas: Policies and procedures; staff development and support; partnerships and collaboration; safety led case management; survivor led support; intersectional & anti racist practice; perpetrator accountability; publicity and awareness raising.

<sup>24</sup> [Domestic Abuse, Stalking and Harassment and Honour Based Violence \(DASH 2009-2024\) Risk Identification and Assessment and Management Model](#)

## B2.3 Partnerships

### WHY?

Homeless households often have a complex network of support services around them. We need to ensure that the partnership works well for them: that advice and support is comprehensive, clear, coordinated and consistent. Partnership work stretches beyond the examples below – as expressed in the homelessness review, it takes a borough-wide effort to end homelessness.

### WHAT WILL THIS INCLUDE?

The Homelessness Review identified a cohort of people who are the furthest away from having their accommodation needs met permanently and sustainably. We will **develop a “by name” meeting / partnership**, working creatively and collaboratively to address individuals’ accommodation and support needs. We will work in partnership with local probation services, who are beginning to coordinate a similar piece of work, through the lens of people who are currently in prison and who are at risk of homelessness upon release.

Linked to this, we will explore opportunities to assist people with no recourse to public funding and consider whether accommodation or support is required to meet the needs of this vulnerable group. We will forge closer links with organisations who can provide humanitarian help to people who have no recourse to public funds and improve data monitoring of this group.

As mentioned previously ([B1.2](#)), we will seek to **recommission the Intensive Support Service** (currently funded to March 2025) to meet current need. We will ensure that the service retains an assertive outreach function, to identify and support people sleeping rough, but we will also ensure that families are supported where necessary, as well as other households at risk. We will ensure that this service is joined up with other services such as NIHCSS<sup>25</sup> and SHPS.

Crucially, we will also **improve our working relationship with local Social Care partners** to ensure immediate crisis assessment where needed. We will establish regular strategic meetings, re-establishing a clear first point of contact and escalation routes. We will continue to work with Norfolk County Council to strengthen the offer to care leavers facing homelessness. We will monitor closely to address any gaps in provision for individuals assessed.

---

<sup>25</sup> [Norfolk Integrated Housing and Community Support Services](#)



## B3 ACCOMMODATION

### Overall aim

Good quality accommodation is central to ending homelessness, and central to many individuals' personal vision for the future. In the words of one respondent during the strategy development sessions, *"I just want a flat, to have well-being and to get on with all I've got planned"*.

The Homelessness Review identified the lack of local accommodation as a key barrier to personal and collective progress, as well as a key contributor to the volume (and cost) of people accessing emergency accommodation at any given time.

This strand aims to:

**Ensure that safe accommodation is available to everyone who needs it.**

**Ensure that accommodation is suitable to a household's needs.**

**Ensure that people residing in short/medium-term accommodation (such as hostels) are supported to move on in a timely and sustainable manner.**

### B3.1 Single Person Accommodation

#### WHY?

Although the proportion has reduced over time, applicants without children<sup>26</sup> represent the greatest proportion of those approaching the council for assistance over the last four years. There are more than 110 bed spaces in the borough<sup>27</sup> for people who are single and homeless (or at risk of homelessness), tailored to age and support need. Supported accommodation forms an essential part of the borough's efforts to end homelessness.

For our strategy to be effective, supported accommodation should operate as a cohesive system, with the expectation that residents will gain independence, gain resilience, and move on into sustainable 'mainstream' housing.

#### WHAT WILL THIS INCLUDE?

To ensure that single person accommodation is operating effectively, we will work with partners **to review the effectiveness of the existing hostel pathway**. Amongst other factors, we will consider the expectations that residents have when entering accommodation, the level of positive and sustained outcomes, the factors leading to an unsuccessful stay, and the proportion of individuals accessing supported accommodation repeatedly.

<sup>26</sup> More accurately: applicants who do not have custodial access to their children. The strategy acknowledges the importance of parental responsibility and family ties (see [B4.2](#))

<sup>27</sup> BCKLWN Homelessness Review 2024, 4.3 "Accommodation"

We will work with support workers to help maximise the effectiveness of their communication and support, particularly with a view to empowering residents towards employment or other meaningful activity.

We are due to launch a **Supported Housing Partnership** this summer, to improve the coordination of referrals into supported housing. The partnership will be tested initially with three local accommodation providers. Currently, each provider has its own referral form, resulting in multiple referrals from multiple agencies into multiple supported housing providers.

Through the partnership, all referrals to supported housing providers will be made using a common referral form, with the partnership acting as a 'gateway', so that cases can be discussed by partners before identifying suitable accommodation.

The partnership will ensure that all individuals who need supported accommodation are considered and prioritised appropriately, identifying barriers to move-on and preventing multiple and repeated periods for clients living in supported accommodation. Once established, we will look to extend the scope of the partnership to youth and other provision.

Based on the success of the model since its launch in 2022, we will issue a tender to **recommission the Housing First model**<sup>28</sup> when the current commissioned service expires in March 2025. We will aim to extend the project to support up to 18 individuals at a time (subject to funding), ensuring that the model aligns as closely as possible to Housing First England principles.

As part of the exercise, we will review the 'entry criteria' for the service, to ensure that Housing First accommodation and support is available to those who need it the most.

We will also seek to develop **single person accommodation that incentivises paid employment**. We will work with partners to develop a model where an individual's rent is affordable even when in work<sup>29</sup>. We will link this to the revised Homelessness Prevention Fund ([B1.4](#)) to create 'flow' through the supported accommodation system, by helping people to move out of accommodation when ready.

## **B3.2 Private Rented Sector (PRS)**

### **WHY?**

The Homelessness Review identified the end of PRS tenancies as the most common cause of people presenting to the council as homeless or at risk of homelessness. As well as working to prevent PRS tenants from becoming homeless (see [B1.4](#)), the strategy seeks to develop opportunities for homeless households to find and sustain PRS accommodation.

---

<sup>28</sup> Housing First provides intensive support to individuals with a history of rough sleeping, who have previously been unsuccessful in sustaining housing through the hostel route. By providing the housing 'first' (rather than as a reward for graduating through the hostel system) and providing wrap-around support, the scheme aims to break the cycle of homelessness and rough sleeping for individuals facing multiple disadvantages. Further details can be found on the [Homeless Link website](#)

<sup>29</sup> Much supported accommodation is let on an Intensive Housing Management (IHM) basis – an above-average rent (typically between £200-300 per week), which funds the support provided to residents, who claim housing benefit when out of work. As a model, IHM can (in some circumstances) serve to disincentivise work, due to the reduction in housing benefit received (and increase in net rent) when in paid employment. Conversely: if the same person moves into a room in a PRS shared house, the typical rent may be much lower. They would still stand to lose their housing benefit if they gained work, but they could see the benefits of paid work more quickly. Therefore, we could work towards commissioning PRS-style accommodation, of good quality, that is priced in line with the wider market, rather than in line with supported accommodation rates.

## WHAT WILL THIS INCLUDE?

At the core of the strategy, **we will re-engage PRS landlords and agents**. We will create a new strategic, enabling role to bring together various existing strands of work and to develop and re-establish relationships with PRS landlords. The role will act as a central point of contact for landlords and agents, to de-escalate concerns and to work creatively for the benefit of landlords and tenants alike.

We will create **a new PRS access fund** to incentivise landlords and clients. This could potentially include small grants for repairs or to bring a property up to standard, for use by a homeless household. We will explore the possibility of extending the rent guarantor product currently used by SHPS or guaranteeing rent to landlords (where this may secure a property for a homeless household). The fund will operate flexibly and pragmatically in line with household need.<sup>30</sup>

We will ensure that this fund is linked with incentives elsewhere (such as energy efficiency grants) to maximise the support available. We will work closely with our colleagues in Housing Standards to ensure that households are supported into safe, good-quality homes. We will also review the effectiveness and impact of offering rent deposits and rents in advance as a loan at the start of a tenancy, rather than offering as a grant.

Additionally, we will **explore the viability of a rent-a-room scheme** to link suitable single households with residents who have available spare rooms. Such schemes have worked well in other settings (for young people or for Ukrainians seeking accommodation). We will carry out 'market engagement' first to establish whether there is sufficient supply and demand to launch such a scheme.

We will also explore the viability of a **"tenant swap" scheme for private sector tenants**. Where a household is unable to sustain PRS accommodation – for example, a family living in a 3-bed house who cannot afford the rent due to ill health – we would accept a homelessness duty for them. We would then nominate a suitable household – for example, another family who are in temporary accommodation and have recently gained employment – to replace them<sup>31</sup>. Both above schemes would link with the wider engagement work with current and prospective PRS landlords.

### B3.3 Social Housing and Other Accommodation

#### WHY?

There is a proportion of homeless households whose needs will only be met by social housing<sup>32</sup>. This may be because of their income, support needs or support network. As part of our strategy, we will work with partners to maximise the supply of good quality social housing, including developing the specialist accommodation available to the borough's residents.

#### WHAT WILL THIS INCLUDE?

As part of this strand, we will **conduct a review of the council's allocations policy for social housing**, to ensure the best use of both social housing and PRS. Linked to the review of supported

---

<sup>30</sup> Here, the key is creativity: the fund is likely to be limited at first but may be increased if a clear financial gain / saving to the council can be demonstrated.

<sup>31</sup> We would assist the household at risk into alternative accommodation before possession action is taken if the landlord agrees to accommodate the household in temporary accommodation. The landlord avoids having to take the tenant to court for rent arrears and avoids having to pay a letting agent to find another family to occupy the property. The tenant avoids the trauma of eviction; the other household moves into suitable long-term accommodation.

<sup>32</sup> This figure will be included in the forthcoming Housing Needs Assessment

accommodation, we will explore creating a 'gateway' out of the hostel system, ensuring that social housing is prioritised for those who cannot move on elsewhere. This will link with the work to understand and evaluate the effectiveness of the current hostel system, and the barriers towards move-on.

The review will include a review of the housing needs of young carers and their families, as well as individuals exiting the care system.

We will also explore the viability of **creating good-quality, shared accommodation for homeless applicants** who choose to share with others. During the strategy development sessions, some participants expressed a desire for such accommodation. If viable, we would look for accommodation that is good quality, low energy and low cost, incentivising paid employment where possible and encouraging positive relationships between tenants and with the wider community.

We will continue work with housing providers to **reduce levels of void properties**. The supply of good-quality social housing is essential to the success of our strategy – we will continue to work proactively with housing providers, challenging them to bring properties into use promptly, and working collaboratively and creatively to achieve this.

Finally, we will work with partners to **develop a pathway to support and accommodate substance users**. In a recent meeting, inclusion health partners described alcohol use as the key contributing factor to deaths of their patients over the last year. During the strategy development sessions, participants described a common scenario whereby individuals could not access residential treatment services because of the lack of suitable post-treatment accommodation. We will work to remove accommodation as a barrier to substance treatment and recovery. When complete, a pathway would provide a harm-reduction setting in advance of treatment, and a safe 'dry house' post-treatment.

## B4 RECOVERY

### Overall aim

For many, the process of recovering from the trauma of homelessness will occur naturally, through social ties, existing support networks and personal resilience. Others will need the help of specialist services, both to help them avoid a return to homelessness and to address the underlying issues that led to them losing their home.

This strand aims to:

**Ensure that nobody experiences homelessness more than once.**

**Ensure that formerly homeless people are empowered to thrive in the borough.**

### B4.1 Health and substances

#### WHY?

More than 70% of homeless applicants over the last four years have expressed that they have at least one support need. Health issues, whether physical, mental or substance related, are the most common support needs identified by homeless applicants.

To enable formerly homeless people to live safe, independent lives, the homelessness and rough sleeping strategy needs to align and coordinate with the work of local health partners. The strategy will also align with the wider work to establish West Norfolk as a Marmot Place (see [B5.1](#)).

#### WHAT WILL THIS INCLUDE?

To help achieve this, we will **improve access to mainstream health services for homeless people**. Currently, there are 21 GP surgeries signed up as Inclusion Health practices. Using the Inclusion Health framework and existing Integrated Care Boards (ICB) contacts, we will develop our work with partners to ensure homeless people have access to suitable treatment, wherever they are in their housing journey.

We will also explore the possibility of establishing health outreach functions operating from two or three practices, focused around the areas of highest need but ensuring that rural locations are served well.

As described in the previous chapter, we will **develop a recovery offer for people with alcohol dependency** who are experiencing homelessness, dovetailing accommodation and support. We will develop this in partnership with local support services, including CGL and NIHCSS.

Additionally, we will review and **develop the offer for people with brain injuries and/or learning difficulties** – both of which are key contributory factors to homelessness. Working with Norfolk County Council and with local specialist partners, we will assess the level of need locally and identify areas that need strengthening. We will review and develop risk management plans for those commencing tenancies, to ensure they have the best chance of success in their new setting.

## B4.2 Community

### WHY?

To enable formerly homeless people to live fulfilling lives, we need to improve access to the range of facilities and opportunities offered by the wider community. We have some excellent local services that specialise in supporting homeless and formerly homeless people, but we don't want people to be limited in what they can access. This strategy aims to build and strengthen bridges between specialist and mainstream services and structures.

### WHAT WILL THIS INCLUDE?

As part of this, we will seek to **engage local businesses in the recovery process through employment placements and apprenticeships**. We will build on existing links with the DWP, as well as drawing upon existing relationships between local homelessness services and local employers. Existing covenants are in place locally for armed forces veterans and care leavers – such covenants may act as models that could inspire or inform local agreements between employers and formerly homeless people.

Linked to this, we will engage residents to support formerly homeless people through a **'skills-based' mentoring scheme**. Several of the respondents to our online survey indicated a desire to work as a mentor to someone looking to recover from homelessness and gain independence. Building on a model established in Cambridge, we will seek to match residents with people who have experienced homelessness, based on a shared interest.

The aim of such a model is to avoid a 'paternalistic' mentoring scheme, and instead identify shared strengths, such as guitar playing, board games or sports. The scheme will help to tackle loneliness, ensuring that people have equal access to the facilities offered by the borough.

Working with local social prescribers, we will ensure all **formerly homeless people have access to a range of leisure and cultural facilities** to aid their recovery. This work will be driven and guided by a new co-production group (see [B5.2](#)).

Finally in this section, we will **make use of 'father-inclusive' practices**, particularly for single people looking to develop and/or restore their relationship with their children. Father-Inclusive Practice is a key current priority for the Norfolk Safeguarding Children's Partnership (NCSP)<sup>33</sup>. In the words of a recent report, "fathers are a point of reference for all children as they grow up and they have a significant impact on the health, safety, wellbeing and life chances for those children"<sup>34</sup>.

Additionally, many formerly homeless people have found that their recovery has been strengthened by regaining/developing contact with their children, strengthening their social capital and improving their wellbeing.

The above services could be delivered by existing services, but (subject to funding) we will look to create a new project coordination role, with a specific remit of developing links between specialist services, homeless people and 'mainstream' life in the borough.

---

<sup>33</sup> <https://norfolklscp.org.uk/people-working-with-children/nscp-priorities>

<sup>34</sup> Norfolk Children's Safeguarding Partnership, "[Keeping Fathers In Sight: Good Practice Guid for Engaging and Working With Fathers](#)"

## B4.3 Sustainment

### WHY?

To end homelessness, we should ensure that people who experience homelessness never experience it again. The borough already benefits from several services that work towards this aim – this strategy seeks to strengthen and emphasise the work to ensure that formerly homeless people sustain their accommodation and live resilient, independent lives.

### WHAT WILL THIS INCLUDE?

As mentioned in previous chapters, we will **recommission the existing Intensive Support Service**, placing a firm emphasis on sustainment and the inclusion of families. The service has already begun to move away from crisis intervention in the light of reduced rough sleeping numbers – we will aim to commission a service that prioritises upstream prevention and longer-term sustainment, linking with the community development strands described above.

As described in the Prevention chapter, we have **recommissioned SHPS** and will use the new framework to measure recovery and sustainment outcomes. We have worked closely with Bridges Outcomes Partnership and the Benjamin Foundation to ensure that SHPS service users identify realistic targets that address the underlying causes of their homelessness. We will examine these measures periodically and seek to learn lessons that can be applied to other strands of our work.

We will ensure that the **new information and advice service (B1.2)** incorporates a focus on **sustainment**. As well as dealing with immediate crises, we will work with Shelter and Norfolk Citizens Advice to identify opportunities for building financial capability and developing resilience in service users. We will ensure that the commissioned services work well with each other, potentially developing a ‘recovery subgroup’ to share good practice and coordinate work effectively.

We will work with external partners to **review the Accommodation for Ex-Offenders Scheme (AfEO)**<sup>35</sup>. This strand of work will link with the ‘by-name’ reviews of homeless offenders described in the Intervention chapter. Working with other commissioned providers above, we will identify and address barriers to recovery for ex-offenders.

Finally, we will **develop a programme of “multi agency check-ins”** for new tenants who are identified as being at risk of losing the accommodation that they have found. This could work as an extension of (or could be based on) the principles developed by the West Norfolk Help Hub<sup>36</sup>, seeking to identify and resolve issues before they escalate, and viewing sustainment as a form of prevention. We will work with partners to identify where similar work is already taking place, developing on any good and effective practice.

This will link with work planned with Shelter for prospective tenants, under their new Information and Advice contract with the council. This work will support prospective tenants to understand their rights and responsibilities, reducing the risk of tenancy failure and fostering good landlord-tenant relationships.

---

<sup>35</sup> [Accommodation for Ex-Offenders scheme: local authority funding allocations between July 2021 and March 2025 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>36</sup> [West Norfolk Help Hub | West Norfolk Help Hub | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](https://www.west-norfolk.gov.uk)

## B5 SYSTEMS SUPPORT AND SERVICE CULTURE

### Overall aim

Strong systems support and service culture acts as a framework upon which to build excellent services. During the process of developing this strategy, partners and service users talked about how we do things, and how we do things together, more than possibly any other area of work. To end homelessness, our good work and innovative services need to be underpinned by comprehensive, positive and effective structures and partnerships.

Our service culture must be developed with and alongside homeless people, closing the 'communications gap' (identified in the Homelessness Review) between key services and the people they serve.

This strand aims to:

**Work as one borough to achieve prevention, intervention, accommodation and recovery aims.**

**Design services *with* service users.**

**Deliver services in line with the values of the partnership.**

### B5.1 Partnerships and Staffing

#### WHY?

Strong partnerships, consisting of well-trained, resilient staff, are at the centre of this strategy. Frontline staff, service leaders and people with lived experience of homelessness all talked passionately on this subject during our development sessions. As stated in the introduction, strategy is "*an integrative set of choices*". To end homelessness, we need to work more effectively as an integrated system, both in terms of 'core' homelessness services and the wider system that supports often vulnerable residents.

#### WHAT WILL THIS INCLUDE?

Following the launch of this strategy, we will create a **multi-disciplinary Strategy Implementation Partnership**, to replace the existing Strategic Housing Collaboration Group. We will create several sub-groups to implement the strategy, as well as acting as a platform for training, networking and mutual support. The partnership will share characteristics with Communities of Practice<sup>37</sup> - partners will be given opportunities to lead each other in their areas of specialism, with the council acting as a facilitator.

The partnership will link closely with the wider countywide strategic work including No Homelessness in Norfolk, the Norfolk Homelessness Solutions Forum, the Norfolk Domestic Abuse Partnership Board and others. It will link with, and reinforce, the countywide commitments under Homes for Cathy<sup>38</sup>.

<sup>37</sup> [Communities of Practice: The Organizational Frontier \(hbr.org\)](https://www.hbr.org)

<sup>38</sup> [Homes for Cathy - Broadland Housing Association \(broadlandgroup.org\)](https://www.broadlandgroup.org)



As well as strengthening links between core services, we will further **develop links between key services, other council departments and elected members**. This could include training and development for staff and members on what the partnership does, and how to take part in its work. With the consent of the group, we could explore opening up the Homelessness and Housing Delivery Task Group, so that key frontline services (and even service users) are invited to share their experiences, successes and challenges with group members.

We will also **develop a partnership-wide “best practice” guide to supporting and developing staff**. The Homelessness Review identified the recruitment and retention of staff as a key challenge (and barrier) to effective service delivery. We will work as a partnership to share what works well in terms of recruiting, training and retaining staff within services that support homeless people. This may include training and progression opportunities, team development, embedding trauma-informed ways of working, rewarding and celebrating success, reflective practice and so on.

The Homeless and Rough Sleeping Strategy will link with the borough-wide work to **establish West Norfolk as a Marmot Place**. Marmot principles will address health inequalities in the borough “[arising] from a complex interaction of many factors - housing, income, education, social isolation, disability - all of which are strongly affected by one's economic and social status”<sup>39</sup>.

Positive health outcomes will impact, and will be impacted by, positive housing outcomes. We will work closely with Norfolk County Council and the local Integrated Care Board towards Marmot principles, over a timeline beyond the length of this strategy.

## **B5.2 Lived Experience and Co-Production**

### **WHY?**

To position our services effectively, we need to understand what works well for the people who are using the services. We cannot end homelessness without understanding the needs and aspirations of people who are experiencing (or who have experienced) homelessness. We will work with partners towards a co-production model, where services are shaped and developed by the people who may use (or may have used) them.

### **WHAT WILL THIS INCLUDE?**

Alongside the Strategy Implementation Partnership, we will **establish a co-production group** comprising individuals with lived experience of homelessness. We will draw on good practice from elsewhere in the country to ensure that group members are trained and empowered to contribute effectively to the group. The group will act as a ‘feedback loop’ to key services, to shape policy and practice.

We will also **embed trauma-informed principles and practices**<sup>40</sup> across all services, drawing on feedback from service users and partners. This work also forms one of the Norfolk Children's Safeguarding Board's current priorities, and links well with Marmot principles previously mentioned. Trauma-informed principles are regarded as particularly effective in supporting people who have multiple barriers to sustaining accommodation but will be of value to all homeless applicants.

---

<sup>39</sup> [Marmot Review report – 'Fair Society, Healthy Lives | Local Government Association](#)

<sup>40</sup> [Working definition of trauma-informed practice - GOV.UK \(www.gov.uk\)](#)

Linked to the above (and to the 'best practice' guide for staff), we will **develop a career pathway model** to actively encourage people with lived experience into homelessness support roles. As described in the Homelessness Review, many local services employ people with lived experience in either paid or voluntary roles, but further intentional work is needed to develop a partnership-wide approach.

The above aims could be delivered by existing services, but (subject to funding) we will look to create a new "lived experience coordination" role, with a specific remit of amplifying the voices of people with lived experience in the borough.

## **B5.3 Communication**

### **WHY?**

Communication was a key theme arising from the sessions that supported the development of this strategy. To be effective in ending homelessness, we should communicate clearly and empathetically with people who have approached us in crisis, and we should communicate effectively with partners and with the wider borough. Our messages should be underpinned by reliable and transparent data.

### **WHAT WILL THIS INCLUDE?**

We will develop a **clear and comprehensive communications strategy** around homelessness. This will include explaining who we are and what we do. It will set out the goals we are aiming for and the progress we have made towards these, celebrating success and acknowledging challenges faced by the partnership.

The strategy will also include a section designed to help members of the public who are concerned about homelessness and want to help, explaining how they can take part in the work to end homelessness. This will include a "myth busting" section to address common misconceptions about homelessness.

We will also **review and refresh all advice letters, leaflets and external communications** issued by the Housing Options Service. As part of our statutory duties, we have an obligation to communicate legal decisions to homeless applicants. The review will ensure that letters and communications are both clear and empathetic. We will explore digital means of communication to do this, whilst recognising that more traditional means of communication are necessary for some client groups. Where possible, we will involve people with lived experience in this process, linking with the new co-production group ([B5.2](#)).

We will establish a **clear, public-facing data portal** to support the communications strategy. We have begun work on the portal, using BI technology to present information clearly. The portal will convey the partnership's successes and challenges in relation to key performance indicators. Amongst other applications, this will be used to support and inform the work of the Homelessness and Housing Delivery Task Group.

Finally, we will develop a **clear and straightforward Information Sharing Protocol** between partners, to improve joint-working and problem-solving around homeless applicants and those at risk. We have drafted an Information Sharing Protocol to support the work of the Supported Housing Partnership ([B3.1](#)) – we will explore the possibility of extending this protocol for the benefit of other services.

## PART C – DRAFT ACTION PLAN

### KEY

<b>AfEO</b>	<a href="#">Accommodation for Ex Offenders</a>
<b>BCKLWN</b>	Borough Council of King's Lynn and West Norfolk
<b>DLUHC</b>	Department for Levelling Up, Housing and Communities
<b>DHP</b>	<a href="#">Discretionary Housing Payment</a>
<b>HNS</b>	Housing Needs Service (BCKLWN)
<b>HPG</b>	<a href="#">Homelessness Prevention Grant (DLUHC)</a>
<b>HSIP</b>	Homelessness Strategy Implementation Partnership
<b>ICB</b>	<a href="#">Integrated Care Board</a>
<b>MUCH</b>	<a href="#">Multi Use Community Hub</a>
<b>NCA</b>	<a href="#">Norfolk Citizens Advice</a>
<b>NCC</b>	Norfolk County Council
<b>SHPS</b>	<a href="#">Sustainable Housing Pathway Service</a>
<b>s.106</b>	<a href="#">Section 106 of the Town and Country Planning Act 1990</a>
<b>WNCT</b>	<a href="#">West Norfolk Community Transport</a>

51

## C1. PREVENTION

**Aim:** To ensure that, wherever possible, a person at risk of homelessness does not become homeless. To identify at-risk groups and individuals as early as possible and to support “universal” measures that will reduce the risk of homelessness for all residents.

No	Sub-strand	Action	Owner(s)	Funding and Resourcing	Target Date for Completion	Next steps
1.1	Education and Communication	Develop a clear and universal <b>proactive borough-wide education plan</b> around homelessness prevention	BCKLWN HNS HSIP	<b>Partially funded.</b> Can be delivered to an extent by existing staff / website but may need additional resourcing dependent on the scope of the plan and the design of the portal.	Within one year	Initial meeting with comms
1.2		Develop a universal “ <b>early help portal</b> ” for homelessness prevention to include a “power to refer” function			Within two years	
1.3		Develop a <b>proactive campaign with letting agents</b> towards homelessness prevention in line with 1.1 and 1.2	BCKLWN HNS, working with Housing Standards, SHPS, AfEO	Fully funded 3 years - HPG	Within one year	Create and advertise job role
1.4		“ <b>Road test</b> ” the above with people with lived experience.	Co-production group	<b>Partially funded.</b> Could deliver limited lived experience coordination with existing resources / services.	Ongoing but commence within one year	Create co-production group (see 5.5)
1.5	Client-centred Prevention Services	<b>Embed the new information advice and guidance contract</b> to ensure that all opportunities for homelessness prevention are maximised	BCKLWN; Shelter; NCA	<b>Fully funded</b> committed for 3+2 years	Ongoing but initial work within three months	Meet regularly with Shelter and NCAB; confirm and monitor KPIs

52

1.6		<b>Embed new SHPS upstream service</b> and ensure that lessons are learned from data gathered.	<b>BCKLWN; SHPS; NCC</b>	<b>Fully funded</b> committed annually via HPG – possibility to <b>extend funding</b> subject to NCC match commitment	Within 3-6 months	Review contract; ensure that SHPS aligns with Intensive Support Service
1.7		Reinstate a <b>home visiting function</b> aimed at preventing family evictions	<b>BCKLWN</b>	<b>Existing resource</b> – achieved with changes within budget or changes to work practices	Within 6-9 months	Agree plan with HNS staff
1.8		Redesign and recommission the existing <b>Intensive Support Service</b>	<b>BCKLWN</b>	<b>Fully funded</b> 3 years – will use HPG funding	Within 3-6 months	Draft and issue Invitation to Tender
1.9	<b>Community Links</b>	<b>Maximise use of shared sites</b> to deliver homelessness prevention	<b>BCKLWN; HSIP; NCC</b>	<b>Existing resource</b> – existing staff working flexibly in multiple locations	Ongoing but commence within first year	Initial scoping of suitable sites; liaison with NCC re: MUCH
1.10		Ensure that homelessness prevention services are <b>accessible to rural communities</b>	<b>BCKLWN; HSIP; WNCT</b>	<b>Existing resource</b> – may need a small amount of HPG to cover transport costs	Ongoing but commence within first year	Initial needs analysis; liaison with WNCT.
1.11		Ensure that prevention activities have a <b>specific remit towards families</b> , based in the community	<b>BCKLWN; HSIP; SHPS, Shelter, NCA etc</b>	<b>Existing resource</b> – ensure that strand is included in Invitations to Tender	Ongoing but commence within first year	Link with Draft Invitations to Tender
1.12		<b>Grants and Incentives</b>	Work with <b>private rented sector (PRS) landlords</b> to reduce homelessness arising from the end of PRS tenancies	<b>BCKLWN; all prevention partners</b>	<b>Fully funded</b> for 3 years – will use HPG funding for new role	Within 3-6 months
1.13	<b>Redesign homelessness prevention grant scheme</b> to better meet the needs of		<b>BCKLWN</b>	<b>Repurpose existing funding</b> – extend scope of existing Homelessness Prevention Grants	Within 3-6 months but by April 2025 at latest	Review existing payments; consult with partners to map out gaps in provision

		households at risk of homelessness				
1.14		<b>Review allocations of discretionary housing payments (DHPs)</b> and identify where prevention has been achieved	BCKLWN	<b>Develop existing</b> DHP pot.	Within first year	Initial meeting with Benefits team; review of allocations
1.15	<b>Partnerships and Data</b>	<b>Develop a homelessness champion function</b> to be rolled out borough-wide to all interested services	BCKLWN; HSIP	<b>Existing resource</b> and staffing – though new roles elsewhere in strategy will help feed into this.	Ongoing but commence within first year	Initial actions to emerge from strands 1.1 and 1.2
1.16		<b>Embed new data analyst role</b> to better identify people at risk of homelessness		<b>Develop existing</b> job role	Within 3 months and then ongoing	Launch of Power BI homelessness information portal



## C2. INTERVENTION

**Aim:** To ensure that people who are homeless are identified quickly and placed into suitable, cost-effective accommodation where necessary, avoiding the use of Bed and Breakfast and nightly-paid accommodation. To ensure that support is provided to overcome barriers to accessing (and sustaining) emergency accommodation.

No	Sub-strand	Action	Owner(s)	Funding and Resourcing	Target Date for Completion	Next steps
2.1	Accommodation	Using data, <b>commission and design sufficient emergency accommodation</b> to meet need.	BCKLWN Housing Strategy	<b>Partially funded</b> – could use monies arising from s.106 payments.	Within six months – in line with audit recommendation	Continued liaison with Housing Strategy. Needs assessment already carried out.  Fairstead 7 units Sept 2024 Reid Way 7 units by 2026
2.2		Design and commission sufficient emergency accommodation to <b>replace Welfare Cabins.</b>	BCKLWN Housing Strategy	<b>Partially funded</b> – could use monies arising from s.106 payments.	By October 2024	Initial discussion with potential supplier July 2024
2.3		Review <b>offer of accommodation to people sleeping rough.</b>	BCKLWN	<b>Existing resource</b> staff and partners.	Within first year	Conduct analysis of all offers of accommodation outside s.188 duty
2.4	Support	<b>Redesign and redevelop Personal Housing Plans (PHPs)</b> issued by the council to homeless applicants.	BCKLWN plus coproduction group, HSIP	<b>Existing resource</b> staff and partners – but would benefit from coproduction coordinator	Within first year	Schedule initial review of current PHPs
2.5		<b>Develop a “what to expect” document</b> for homeless applicants and partner agencies.	BCKLWN plus coproduction group, HSIP, comms team	<b>Existing resource</b> staff and partners – but would benefit from coproduction coordinator	Within first year	Schedule initial review of current comms

55

2.6		<b>Review the provision of basic items</b> to meet the need of people accessing emergency accommodation.	<b>BCKLWN</b> plus co-production group, HSIP, comms	<b>Fully funded</b> based on estimate of current provision. Could use HPG to top-up.	Within first year	Schedule initial review of current provision
2.7		Embed processes introduced during <b>Domestic Abuse Housing Alliance (DAHA) accreditation</b> . Review the emergency offer (and processes) for victim-survivors of domestic abuse.	<b>BCKLWN</b> plus DAHA implementation group	<b>Existing resource</b> staff and partners	Ongoing but commence by December 2024	Work towards DAHA accreditation, with Standing Together charity
2.8	<b>Partnerships</b>	<b>Develop a “by name” meeting / partnership</b> to resolve the homelessness of those who are furthest away from having their housing needs met.	<b>BCKLWN</b> plus probation and HSIP members	<b>Existing resource</b> staff and partners	Ongoing but commence by December 2024	Coordinate with Probation services to expand quarterly meeting
2.9		(linked to 1.8) <b>Recommission Intensive Support Service</b> , reflecting current need	<b>BCKLWN</b>	<b>Fully funded</b> 3 years – will use HPG funding	Within 3-6 months	Draft and issue Invitation to Tender
2.10		<b>Improve working relationship with local Social Care partners</b> to ensure immediate crisis assessment where needed.	<b>BCKLWN; NCC</b>	<b>Existing resource</b> staff and partners	Ongoing but commence within six months	Initial meeting with NCC



### C3. ACCOMMODATION

**Aim:** To ensure that safe affordable accommodation, suitable to their needs, is available to everyone who needs it. To ensure that people residing in short/medium term accommodation (such as hostels) are supported to move on in a timely and sustainable manner.

No	Sub-strand	Action	Owner(s)	Funding	Target Date for Completion	Next steps
3.1	Single Person Accommodation	Review the effectiveness of the existing hostel pathway, conducting a needs assessment of all residents	BCKLWN; accommodation partners	Existing resource staff and partners	Within first year	Establish initial parameters of review with partners and data analyst
3.2		Embed Supported Housing Partnership to develop the effectiveness of the hostel pathway	Supported Housing Partnership	Existing partnership and services		Complete Info sharing agreement and arrange first meeting
3.3		Recommission the Housing First model	BCKLWN	Fully funded 3 years – will use HPG funding	Within 3-6 months	Draft and issue Invitation to Tender
3.4		Develop single person accommodation that incentivises paid employment.	HSIP	Partially funded – could use HPG funding to fund incentives, or use partner resources / s.106 / Housing Companies to develop accommodation	Within two years	Explore accommodation options arising from pathway review.
3.5	Private Rented Sector	Re-engage Private Rented Sector (PRS) landlords and agents. Create a flexible PRS access fund to incentivise landlords and clients.	BCKLWN plus key partners e.g. SHPS, AfEO	Partially funded – new PRS enabling role plus small incentives fund (will need to test against demand)	Within six months	Develop and advertise new job role
3.6		Explore viability of a rent-a-room scheme for single homeless households	BCKLWN, HSIP	Partially funded through new roles and existing	Within two years	Commence once PRS liaison work is well-established

57

				capacity but may need incentives fund (HPG?)		
3.7		Explore viability of <b>“tenant swap” scheme</b> for private sector tenants	<b>BCKLWN, HSIP</b>	<b>Partially funded</b> through new roles and existing capacity but may need incentives fund (HPG?)	Within two years	Commence once PRS liaison work is well-established
3.8	<b>Social Housing and other accommodation</b>	Conduct a <b>review of the council’s allocations policy</b> for social housing	<b>BCKLWN; HSIP</b>	<b>Existing resource</b> but will need to shift priorities to enable within timescales	By September 2025	Initial scoping and consultation
3.9		Explore the viability of creating good quality <b>shared accommodation for homeless applicants</b> who choose to share with others.	<b>BCKLWN; HSIP</b>	<b>Partially funded</b> through new roles and existing capacity but may need incentives fund (HPG?)	Within two years	Commence once PRS liaison work is well-established
3.10		Continue work with housing providers to <b>reduce levels of void properties</b>	<b>BCKLWN; housing providers</b>	<b>Existing resource</b> to work with housing providers	Ongoing, immediate	Continued work
3.11		Develop a pathway to <b>support and accommodate substance users.</b>	<b>BCKLWN; health partners</b>	<b>Not yet funded</b> other than existing resource to research. Could use s.106 money to commission suitable accommodation.	Completion within three years	Initial design with health partners

## C4. RECOVERY

**Aim:** To ensure that nobody experiences homelessness more than once, and that formerly homeless people are empowered to thrive in the borough.

No	Sub-strand	Action	Owner(s)	Funding	Target Date for Completion	Next steps
4.1	Health and substances	Improve <b>access to mainstream health services</b> for homeless people	BCKLWN; ICB	<b>Existing resources</b> including ICB provision	Ongoing but commence within six months	Initial scoping exercise re: GP outreach services
4.2		<b>Develop recovery offer</b> for people seeking to address alcohol dependency	BCKLWN; health partners	<b>Not yet funded</b> other than existing resource to research. Could use s.106 money to commission suitable accommodation.	Completion within three years	Initial design with health partners
4.3		Develop support for people with <b>brain injuries and/or learning difficulties</b>	BCKLWN; health partners	<b>To be confirmed – existing resource</b> to scope out level of need	Commence within first year	Initial scoping exercise with partners and data analyst
4.4	Community	<b>Engage local businesses</b> in the recovery process through employment placements and apprenticeships	BCKLWN; HSIP; DWP	<b>Partially funded</b> – could be delivered through existing roles and partnership, but may benefit from specific recovery/activity coordinator, linked to partners' existing streams of work	Commence work within first year	Establish "community" subgroup from HSIP
4.5		Engage residents to support formerly homeless people through a <b>'skills-based' mentoring scheme</b>	BCKLWN; HSIP			
4.6		Develop and improve <b>access to leisure and cultural facilities</b> for formerly homeless people.	BCKLWN; HSIP; Alive Leisure?			

4.7		<b>Make use of ‘father-inclusive’ practices</b> , particularly for single people looking to develop and/or restore their relationship with their children	<b>BCKLWN; HSIP; NCC</b>		Commence work within six months	Further training / liaison with Dr Mark Dobson – possible bespoke advice
4.8	<b>Sustainment</b>	Ensure that recommissioned <b>Intensive Support Service emphasises sustainment</b> and the inclusion of families	<b>BCKLWN</b>	<b>Fully funded</b> 3 years – will use HPG funding	Within 3-6 months	Draft and issue Invitation to Tender
4.9		<b>Review SHPS framework</b> to measure recovery and sustainment	<b>BCKLWN; SHPS; NCC</b>	<b>Fully funded</b> committed annually via HPG – possibility to <b>extend funding</b> subject to NCC match commitment	Within 3-6 months	Review contract; ensure that SHPS aligns with Intensive Support Service
4.10		Ensure that <b>new information and advice service</b> incorporates sustainment skills	<b>BCKLWN; Shelter; NCAB</b>	<b>Fully funded</b> committed for 3+2 years	Ongoing but initial work within three months	Meet regularly with Shelter and NCAB; confirm and monitor KPIs
4.11		<b>Review “accommodation for ex-offenders” programme</b> , identifying and addressing barriers for recovery.	<b>BCKLWN; Shelter; NCC</b>	<b>Existing resources</b> and partnership.	Within six to nine months	Work with other districts to establish scope of review
4.12		<b>Develop “multi-agency check-ins” for new tenants</b> who may be at risk of losing accommodation	<b>BCKLWN; Help Hub partners</b>	Could be delivered through <b>existing services</b> but may need <b>new project coordinator</b>	Commence within first year	Initial meeting with help hub coordinators

## C5. SYSTEMS SUPPORT AND SERVICE CULTURE

**Aim:** To work as one borough to achieve prevention, intervention, accommodation and recovery aims, designing services with service users and in line with the values of the partnership.

No	Sub-strand	Action	Owner(s)	Funding	Target Date for Completion	Next steps
5.1	Partnerships and staffing	Create a multi-disciplinary <b>Strategy Implementation Partnership</b>	BCKLWN; HSIP	Existing resources and partnership.	Launch within three months of strategy	Draw up invitation list and Terms of Reference
5.2		Further <b>develop links between key services</b> , other council departments and elected members.	BCKLWN	Existing resources and partnership.	Commence within three months of strategy	Draw up engagement action plan prioritising departments
5.3		Develop a <b>“best practice” guide for the partnership</b> for supporting staff	HSIP	Existing staffing and partnership	Within one year	Initial meeting with personnel – learn from staff survey
5.4		Link with the borough-wide work to <b>establish West Norfolk as a Marmot Place</b>	BCKLWN; NCC; ICB	Existing resources and partnership.	Ongoing throughout strategy	Continue liaison with NCC and ICB
5.5	Lived Experience	<b>Establish a co-production group</b> comprising individuals with lived experience of homelessness	BCKLWN; HSIP	<b>Partially funded</b> – could be delivered through existing roles and partnership, but may benefit from specific lived experience coordinator, linked to partners’ existing streams of work	Commence within first year	Establish “lived experience” subgroup from HSIP
5.6		<b>Embed trauma-informed principles and practices</b> across all services	BCKLWN; HSIP; NCC		Commence within first year	
		<b>Develop a career pathway</b> to actively encourage people with	BCKLWN; HSIP		Commence within two years	

61

		lived experience into homelessness roles				
5.7	Communications	Develop a <b>clear and comprehensive communications strategy</b> around homelessness	BCKLWN; comms team; HSIP	Existing staffing and partnership including council comms team	Within six months	Initial meeting with comms team and HSIP members
5.8		Review and refresh all advice letters, leaflets and external communications issued by the Housing Needs Service	BCKLWN; co-production group	Existing staffing and partnership including council comms team	Within one year	Set up task group within Housing Needs
5.9	Data and information	Establish a <b>clear, public-facing data portal</b>	BCKLWN Housing Strategy	Existing staffing and partnership including data analyst	Within three months	Meeting between members and data analyst July 2024
5.10		Develop a clear and straightforward <b>Information Sharing Protocol</b> between partners	BCKLWN; HSIP	Existing staffing and partnership	Within six months	Circulate Supported Housing Partnership protocol once agreed

## HOW WILL WE MEASURE SUCCESS?

Progress against the above actions will be reviewed at least once every three months at the Homelessness Strategy Implementation Group meeting, with key successes and challenges reported to the Homelessness and Housing Delivery Task Group. We will also present an annual report to the council's Environment and Communities Panel, outlining our progress and updating the plan to reflect any changes in circumstance.

We will also record and monitor the following, as an indication of our progress towards ending homelessness:

Strand	Key indicator(s)
Prevention	Number of households with a homelessness declaration
Prevention	Number of households: <ul style="list-style-type: none"> <li>at risk of becoming homeless e.g., insecure accommodation, sofa surfing</li> <li>prevented from becoming homeless for a minimum of 6 months</li> <li>accepted as homeless with a need to be rehoused (Full housing duty)</li> </ul>
Intervention	Percentage of homeless households who were offered a prevention and relief duty, who remain homeless and are owed no further duty.
Intervention	Nightly paid accommodation (inc. B&B): <ul style="list-style-type: none"> <li>Number in accommodation</li> <li>Spend on accommodation</li> </ul>
Intervention	Average length of stay in temporary accommodation
Intervention	Number of people verified as sleeping rough: <ul style="list-style-type: none"> <li>Monthly total</li> <li>Monthly new to sleeping rough</li> <li>Snapshot (single night) total</li> <li>Snapshot – new to sleeping rough</li> </ul>
Accommodation	Number of applicants on the HomeChoice register, by priority band
Accommodation	Number of lettings to social housing
Accommodation	Number of new Safe Accommodation units and places delivered.

Additionally, we will introduce the following new measures, to ensure that homeless applicants' voices are listened to:

- A customer feedback button ("how did we do?") at the foot of standard emails from the Housing Needs Service, linking to a brief survey about their experience
- A quarterly review of any complaints received to the Housing Needs Service, with a record kept of lessons learnt and remedial action taken
- A clear interface between the work of the council and the work of the newly formed co-production group.

DRAFT



## GET INVOLVED

The King's Lynn and West Norfolk Homelessness and Rough Sleeping Strategy is a framework for ending homelessness in the borough. It makes clear where we want to be heading, how we want to do things, and the key aims and objectives of the partnership.

The extent to which we achieve our aims and objectives is proportionate to the resources at our disposal. As written in our Homelessness Review earlier in the year: it takes a borough to end homelessness.

Over the next year, we will be launching many of the initiatives described in the strategy, including:

- Strengthening our relationship with private sector landlords.
- Procuring accommodation to replace expensive bed and breakfast use.
- Creating a 'co-production group' so that our future work is designed with people who have used (or are currently using) homelessness services.
- Support improving access to job opportunities and leisure/cultural facilities for people recovering from homelessness.

If you would like to be involved in the work to end homelessness in the borough – through any of the initiatives described in this document, or through any other ideas that would fit well within the framework – please email us at [Strategic.Housing@west-norfolk.gov.uk](mailto:Strategic.Housing@west-norfolk.gov.uk) or call 01553 616200.

**REPORT TO CABINET**

<b>Open/Exempt</b>		Would any decisions proposed:			
<b>Any especially affected Wards</b>	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	
Lead Member: Cllr Michael de Whalley E-mail: <a href="mailto:cldr.michael.dewhalley@west-norfolk.gov.uk">cldr.michael.dewhalley@west-norfolk.gov.uk</a>		Other Cabinet Members consulted:			
		Other Members consulted: None			
Lead Officer: Dave Robson E-mail: <a href="mailto:dave.robson@west-norfolk.gov.uk">dave.robson@west-norfolk.gov.uk</a> Direct Dial: 015530616302		Other Officers consulted: David Alford, Matthew Henry, Stuart Ashworth, Alex Fradley, Jemma Curtis, Martin Chisholm, Becky Box			
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

Date of meeting: 17<sup>th</sup> September 2024

**AIR QUALITY ACTION PLAN REVISION**

**Summary**

This report puts forward a revised Air Quality Action Plan (AQAP) for adoption in relation to the Railway Road/ London Road Air Quality Management Area (AQMA). The revised AQAP follows statutory guidance LAQM PG (22) issued by DEFRA. The mitigation measures have been reviewed and updated with input from Norfolk County Council Highways and Public Health departments. A review of the Gaywood Clock shows Nitrogen Dioxide (NO<sub>2</sub>) levels have improved and an AQMA is no longer required at that location.

**Recommendations**

Cabinet Resolves:

1. Adopt the Air Quality Action Plan for Railway Road/ London Road attached as Appendix 1
2. Revoke existing Gaywood Air Quality Management Area

**Reason for Decision**

The Council is required to update the AQAP every five years. The Gaywood Clock AQMA no longer exceeds the National Air Quality Objective annual mean objective for Nitrogen Dioxide and should be revoked.

## **1 Background**

- 1.1 This report sets out the basis for the review and update of the Council's Air Quality Action Plan (AQAP).
- 1.2 The Council is required to have an AQAP as it has previously declared two Air Quality Management Areas (AQMA).
- 1.3 The levels of Nitrogen Dioxide (NO<sub>2</sub>) have shown a downward trend over the last several years, whilst the covid pandemic saw a further reduction during 2020 & 2021, there has been no significant post pandemic bounce back. Current NO<sub>2</sub> levels remain below the pre-pandemic levels.

## **2 Options Considered**

- 2.1 A long list of options have been considered, and these have been included as part of the background papers. The measures considered follow Statutory Guidance and current best practice. These measures need to take into consideration the main sources of the NO<sub>2</sub>, therefore they have focused on road transport mitigation.
- 2.2 The measures included in the draft plan are proportional to the current NO<sub>2</sub> levels and many measures were screened out as unnecessary due to the current NO<sub>2</sub> levels not breaching the annual mean objective in either AQMA.
- 2.3 Options have been reviewed with input from Borough Council staff and Norfolk County Council Highways and Public Health departments.
- 2.4 The draft AQAP puts forward 13 measures.

## **3 Policy Implications**

- 3.1 The draft AQAP follows DEFRA's Local Air Quality Guidance Policy Guidance LAQM. PG 22.
- 3.2 The draft AQAP has been circulated to Norfolk County Council Highways and Director of Public Health for their review.
- 3.3 A copy of the draft AQAP has been submitted to DEFRA for their consideration. DEFRA have indicated the AQAP will be reviewed once it has been adopted.
- 3.5 The draft AQAP has been subject to a public consultation from 3<sup>rd</sup> January to 1<sup>st</sup> March 2024 which included an online questionnaire and two Officer led face to face public drop ins held at Gaywood Library and Central Library in King's Lynn.

- 3.6 A summary of the public consultation responses are included as a background paper.
- 3.7 The public consultation shows strong public approval for the draft AQAP and its 13 measures.
- 3.8 A further review of the Railway Road/ London Road AQMA will be carried out once the options to the Southgates Masterplan and Gyratory system have been completed. Once these final traffic flows have been determined, we will be able to review the overall air quality impacts, including the proposed West Winch housing growth area. We can then determine if the current Railway Road/ London Road AQMA should remain, be amended, or revoked.
- 3.9 No policy implications have been identified and several Council projects such as reviewing the car park strategy or staff travel plan have been included as measures in the draft AQAP.
- 3.10 Whilst the draft AQAP follows DEFRA LAQM statutory guidance, it also links to the “Protect our environment” policy listed in the Borough Council’s Corporate Strategy.

#### **4 Financial Implications**

- 4.1 A funding overview is attached to show how the various measures will be funded.

#### **5 Personnel Implications**

- 5.1 None identified. The AQAP will can be implemented with existing staffing resources.

#### **6 Environmental Considerations**

- 6.1 The measures included in the draft AQAP are proportional to the current NO<sub>2</sub> levels within both AQMA’s. There has been a steady reduction within both AQMA’s and at other monitoring locations within the King’s Lynn urban area.
- 6.2 As part of previous reviews, it was found that the level of NO<sub>2</sub> exceeded the annual mean objective levels within King’s Lynn and two AQMA’s have been declared.
- 6.3 A Source Appointment study has identified the main source of the NO<sub>2</sub> within both AQMA’s to be road transport, namely cars within the Gaywood Clock AQMA and car and buses within the Railway Road/London Road AQMA.

- 6.4 The falling levels of NO<sub>2</sub> will help improve the wellbeing of local residents living within both AQMA, especially if they suffer from respiratory conditions such as asthma, COPD, heart, or circulatory issues as elevated of NO<sub>2</sub> can exacerbate existing respiratory conditions.

## **7 Statutory Considerations**

- 7.1 The Council has a statutory duty under Part IV of the Environment Act 1995 (as amended) to review and assess air quality within its district. DEFRA issue Statutory Guidance for Local Authorities to follow namely, LAQM. TG22 for technical issues and LAQM. PG 22 for policy matters.
- 7.2 If a Local Authority declares an AQMA then it shall also develop and adopt an Air Quality Action Plan to mitigate and reduce the level air pollution within the AQMA.
- 7.4 The current AQAP requires a periodic update and review every 5 years, and this report proposes an update of the AQAP.
- 7.5 Section 83 of the Environment Act 1995 states that when an AQMA is designated it may be subsequently revoked following a subsequent air quality review. There are more than five years of data showing compliance with the objective. The 2023 and 2024 Annual Status Reports both show that levels within the current Gaywood Clock AQMA do not exceed the nitrogen dioxide annual mean objective and therefore the AQMA is no longer required.

## **8 Equality Impact Assessment (EIA)**

- 8.1 An EIA pre-screening template has been completed which is attached. The EIA did not identify any negative impacts but identified a positive impact for those with respiratory illness.

## **9 Risk Management Implications**

- 9.1 The main risks associated with not proceeding with the adoption of the draft AQAP are: legal, environmental, and poor public relations.
- 9.2 This is a statutory duty, and we would face censure from Government if this is not pursued. DEFRA oversee this area and have through the Annual Status Report appraisal indicated that a review of the AQMA is required and requested an update on the need for the Gaywood Clock AQMA.
- 9.3 There are tangible environmental benefits from implementing this Action Plan. It will continue to improve the air quality within the most



## Stage 1 - Pre-Screening Equality Impact Assessment

Name of policy/service/function	Air Quality Action Plan
---------------------------------	-------------------------

impacted areas of King's Lynn and the borough wide review of particles with Public Health will enable us to have a better understanding of levels across the district and their sources. This will in turn help determine what measures could be used to further improve air quality in those areas identified on the project.

- 9.4 Failure to act and implement this Action Plan could see poor public perception of the Council not considering its statutory duties and not following the results of the public consultation, which showed a high level of agreement with the draft AQAP.

### **10 Declarations of Interest / Dispensations Granted**

- 10.1 None identified.

### **11 Appendices**

Appendix 1 – Draft Air Quality Action Plan

### **12 Background Papers**

Non-Technical Summary  
Long List of Options  
Consultations Responses  
Funding Overview  
DEFRA Guidance <https://laqm.defra.gov.uk/wp-content/uploads/2023/11/LAQM-Policy-Guidance-2022.pdf>

Question	Answer	Comments			
Is this a new or existing policy/service/function? <i>(tick as appropriate)</i>	New		Existing	X	
<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, and identify relevant legislation.</p>	<p>The main aim is to reduce and mitigate emissions of Nitrogen Dioxide emitted from road transport within the Air Quality Management Areas so that levels meet the annual mean objective level of 40ug/m3.</p> <p>The policy has been completed so that it follows the statutory guidance issued by DEFRA on Local Air Quality Management.</p>				
Who has been consulted as part of the development of the policy/service/function? – new only <i>(identify stakeholders consulted with)</i>	<p>Norfolk County Council Highways and Public Health</p> <p>BCKLWN Departments include Property Services, Car Parks, Corporate Projects, Planning, Policy &amp; Personnel</p> <p>Public Consultation held 3<sup>rd</sup> January to 1<sup>st</sup> March 2024.</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, 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> <p><b><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></b></p>		Positive	Negative	Neutral	Unsure
	Age			X	
	Disability			X	
	Sex			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, caring responsibilities) Respiratory Illness	X				





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



Borough Council of King's Lynn  
and West Norfolk

Draft Air Quality Action Plan 2024-2029

In fulfilment of Part IV of the Environment Act 1995  
Local Air Quality Management

Date:

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

Information	BCKLWN Details
<b>Local Authority Officer</b>	David Alford
<b>Department</b>	Environmental Quality
<b>Reviewed by</b>	Dave Robson (Manager)
<b>Signed off by Director of Public health</b>	Stuart Lines, Public Health, Norfolk CC
<b>Address</b>	King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
<b>Telephone</b>	01553 616324
<b>E-mail</b>	<a href="mailto:environmental.quality@west-norfolk.gov.uk">environmental.quality@west-norfolk.gov.uk</a>
<b>Report Reference Number</b>	Final AQAP 2024-2029
<b>Date</b>	

DRAFT

## Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the action we will take to improve air quality in the Borough Council of King's Lynn and West Norfolk (BCKLWN) over the next 5-years (2024-2029) or until the Air Quality Management Areas (AQMAs) are revoked. It replaces the previous AQAP that was adopted in 2015<sup>1</sup>.

Projects have been delivered through the previous action plan that have contributed towards improving air quality in King's Lynn. They include the following: -

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

Air pollution affects us all. It is associated with impacts on lung development in children, heart disease, stroke, cancer, exacerbation of asthma and increased mortality, among other health effects<sup>2</sup>. Critically, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas<sup>3,4</sup>.

---

<sup>1</sup> Air Quality Action Plan, 2015; [https://www.west-norfolk.gov.uk/downloads/download/346/air\\_quality\\_information\\_documents](https://www.west-norfolk.gov.uk/downloads/download/346/air_quality_information_documents)  
<sup>2</sup> Chief Medical Officer, Air Pollution 2022; <https://www.gov.uk/government/publications/chief-medical-officers-annual-report-2022-air-pollution>

<sup>3</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010

<sup>4</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006; [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944\\_AQinequalitiesFNL\\_AEAT\\_0506.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944_AQinequalitiesFNL_AEAT_0506.pdf)

The annual mortality of human-made air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths every year at typical ages<sup>5</sup>. It is estimated that between 2017 and 2025 the total cost to the NHS and social care system of air pollutants (fine particulate matter and nitrogen dioxide), for which there is more robust evidence for an association, will be £1.6 billion<sup>5,6</sup>.

The associated health costs associated with air pollution require a change with measures that not only tackle the pollution hot spots but more generally also focus on population-wide measures. This means at times going beyond existing air quality objectives which recognises the no observed safe level for some pollutants. As a consequence, this action plan includes a new measure to develop an air quality project for the area to help facilitate these wider health-based improvements.

Actions have been considered under the following short-listed topics identified from a long list of potential options. Those selected are considered as proportionate to levels of pollution being observed:

- Planning policy and development control interventions;
- Promoting travel alternatives and providing infrastructure improvements;
- Vehicle fleet efficiencies / improvements;
- Traffic management improvements;
- Public Information

Our priorities are set out below that focus on traffic reduction measures given this transport was the predominant source of the nitrogen dioxide (NO<sub>2</sub>) in the AQMAs. This was identified through an earlier source apportionment study conducted by Bureau Veritas (2017<sup>19</sup>). The study and measures are described in more detail in Section 3. The AQAP measures are summarised within [Table 5.1](#) where costs and targets are also set out;

- **Priority-1: To increase active travel:** A modal shift to other, more sustainable forms of transport is considered a critical part of the plan, as it will lead to a reduction in private car use, improve air quality and also help to create a healthy community.

<sup>5</sup> Defra. Air quality appraisal: damage cost guidance, July 2021

<sup>6</sup> Office for Health Improvement and Disparities; <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>

- **Priority-2: Public Transport (Bus) improvements:** Public transport (bus) service improvements comprise the next priority. A range of measures are identified within the Bus Service Improvement Plan (BSIP). We have also included a new measure to help the roll out of zero emission buses in King's Lynn.
- **Priority-3: Transport Management:** Prioritising transport management / infrastructure improvements for the centre of King's Lynn to help facilitate a modal shift to more active travel is also a priority. These transport schemes have been progressed to a high level as part of the King's Lynn Area Transport Strategy<sup>7</sup>. The work includes improvements to the town centre's gyratory system in favour of cycling/walking/public transport and also a regeneration of the South Gates area. Once detailed traffic data is available for these schemes they are to be reviewed for air quality.

Other complimentary transport management measures include the development of a comprehensive car-parking strategy, including measures to improve air quality.

- **Priority-4: Review new developments:** Minimising emissions from new developments through best practice principles is also an important aspect of the plan to prevent any deterioration in air quality.
- **Priority-5: Public Information;** A range of interventions are also necessary to better engage the public on air quality necessary to encourage behaviour change.
- **Priority-6: Air Quality Project:** The final element to this AQAP is to develop a local air quality project focussed on particulate matter of less than 10 & 2.5 microns (PM<sub>10</sub> & PM<sub>2.5</sub>).

In terms of current status of air quality this is explained briefly in Section 2 but also in more detail within the council's latest Annual Status Report (ASR 2024). This shows that the Gaywood Clock AQMA no longer exceeds the annual mean objective for nitrogen dioxide (40µg/m<sup>3</sup> NO<sub>2</sub>). The concern had been the extent of traffic rebound

---

<sup>7</sup> Norfolk County Council LTP4, 2021: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/local-transport-plan>

following Covid, but pollution levels are observed as consistently below the objective level. As a consequence Gaywood Clock AQMA is to be put forward for revocation and to remove the associated action from the AQAP (Measure 3.4).

In terms of the Railway Road AQMA, a further detailed air quality review is needed once the options to the Southgates Masterplan and Gyrotory system have been completed and transport data made available. Once this review has been completed we can then determine if the Railway Rd AQMA should remain, be amended, or revoked.

We have considered comments from the public consultation that was undertaken earlier this year (between January – March 2024) within this final draft AQAP and which is to be put forward for adoption.

Responses from the public consultation were strongly supportive of the draft AQAP and its 16 measures. The details are set out in Section 4 with responses shown in Appendix A. Options have also been reviewed with input from Borough Council staff and Norfolk County Council Highways and Public Health departments.

In this AQAP we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards agreed in Europe), but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond the Borough Council of King's Lynn and West Norfolk's direct influence.

### **Responsibilities and Commitment**

This Air Quality Action Plan (AQAP) was prepared by the Environmental Quality section of the Borough Council under the Directorship of Environment & Planning with the support and agreement of:

- Norfolk County Council's local highways and public health departments.

This AQAP will be subject to an annual review and appraisal of its progress as part of our statutory Local Air Quality Management review and assessment duties.

If you have any comments or suggestions on this AQAP, please send to:

## Borough Council of King's Lynn and West Norfolk

Address Environmental Quality Team, Borough Council of King's Lynn and West Norfolk, King's Court, Chapel St, King's Lynn, Norfolk PE30 1EX.

Telephone 01553 616200

Email [environmental.quality@west-norfolk.gov.uk](mailto:environmental.quality@west-norfolk.gov.uk)

DRAFT

## Table of Contents

<b>Executive Summary</b> .....	<b>i</b>
Responsibilities and Commitment .....	iv
<b>1 Introduction</b> .....	<b>1</b>
<b>2 Summary of Current Air Quality in Borough Council of King’s Lynn &amp; West Norfolk</b> .....	<b>2</b>
2.1 Background: .....	2
2.2 Summary of Air Quality Results: .....	2
2.3 Summary of AQMAs and Workplan: .....	3
2.3.1 Railway Road AQMA: .....	3
2.3.2 Gaywood Clock AQMA .....	4
<b>3 BCKLWN’s Air Quality Priorities</b> .....	<b>5</b>
3.1 Public Health Context .....	5
3.2 Planning and Policy Context .....	8
3.3 Source Apportionment .....	10
3.3.1 Source Apportionment of the AQMA’s .....	10
3.3.2 Source apportionment of PM <sub>10</sub> and PM <sub>2.5</sub> .....	13
3.4 Required Reduction in Emissions .....	13
3.5 Key Priorities .....	14
<b>4 Development and Implementation of BCKLWN AQAP</b> .....	<b>18</b>
4.1 Consultation and Stakeholder Engagement .....	18
4.2 Steering Group .....	19
<b>5. AQAP Measures</b> .....	<b>20</b>
<b>Appendix A: Response to Consultation</b> .....	<b>25</b>
<b>Appendix B: Reasons for Not Pursuing Action Plan Measures</b> .....	<b>26</b>
<b>Appendix C:</b> .....	<b>28</b>
<b>Glossary of Terms</b> .....	<b>36</b>
<b>List of Tables</b>	
Table 4.1– Consultation Undertaken .....	18
Table 5.1: Air Quality Action Plan Measures: .....	21
Table A.1 Summary of Responses to Consultation and Stakeholder Engagement on the AQAP .....	25
Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision: .....	26
<b>List of Figures</b>	
Fig 3.1: Source Apportionment for Railway Rd AQMA .....	11



Fig 3.2: Source Apportionment for Gaywood Clock AQMA..... 12

Fig 3.3: Reduction in active travel 1949-2021 ..... 15

Figure C.1: Map of Railway Rd AQMA and location of monitoring sites .....28

Figure C.2: Map of Gaywood Clock AQMA and location of monitoring sites .....29

Figure C.3: Spatial Distribution of NO<sub>2</sub> (annual mean ug/m<sup>3</sup>) around Railway Rd AQMA .....30

Figure C.4: Spatial Distribution of NO<sub>2</sub> (annual mean ug/m<sup>3</sup>) around southern section of the Railway Rd AQMA .....31

Figure C.5: Location of Gaywood Clock AQMA and spatial distribution by diffusion tube results (as 2019 annual mean ug/m<sup>3</sup>).....32

Figure C.6: Trends in NO<sub>2</sub> annual mean (µg/m<sup>3</sup>) along North bound section of Railway Rd AQMA; .....33

Figure C.7: Trends in NO<sub>2</sub> annual mean (µg/m<sup>3</sup>) along south bound section of Railway Rd AQMA; .....34

Figure C.8: Trends in NO<sub>2</sub> annual mean (µg/m<sup>3</sup>) around Gaywood Clock AQMA; .....35

DRAFT

# 1 Introduction

This report outlines the actions that the Borough Council of King's Lynn and West Norfolk will deliver over the next 5-years (2024-29) in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough council's area.

It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process<sup>8,9</sup>.

It also considers the Environment Act 2021 and associated regulations in relation to PM<sub>2.5</sub> which will be developed as part of the wider air quality project measure that sits within this plan.

This Plan will be reviewed every five years at the latest, or on revocation (whichever is the sooner). Progress on measures set out within this Plan will also be reported annually within this Council's Annual Status Report (ASR).

---

<sup>8</sup> Defra, LAQM PG-22; <https://laqm.defra.gov.uk/air-quality/featured/england-exc-london-policy-guidance/>

<sup>9</sup> Defra, LAQM TG-22; <https://laqm.defra.gov.uk/air-quality/featured/uk-regions-exc-london-technical-guidance/>

## 2 Summary of Current Air Quality in Borough Council of King's Lynn & West Norfolk

### 2.1 Background:

There are two Air Quality Management Areas (AQMA's) designated in King's Lynn due to exceedances in nitrogen dioxide (NO<sub>2</sub>) over the long-term (annual mean) objective of 40ug/m<sup>3</sup> namely:

- Railway Rd AQMA; and,
- Gaywood Clock AQMA;

### 2.2 Summary of Air Quality Results:

As explained in this Council's latest 2024 ASR on Air Quality:

- *No exceedances of the National Air Quality Strategy standards were identified for Nitrogen Dioxide (NO<sub>2</sub>) during 2023.*
- *This is the fourth year running at Railway Rd AQMA where compliant results have been observed with no exceedances of the NO<sub>2</sub> annual mean objective. The compliance period is longer for the Gaywood Clock AQMA.*
- *Trends in NO<sub>2</sub> following the first Covid lock-down year of 2020 showed a marked reduction of around 20% in the annual mean NO<sub>2</sub> concentrations. The concern had been the extent of traffic rebound, but annual mean concentrations have subsequently remained relatively constant, with results less than 10% of the NO<sub>2</sub> objective (40µg/m<sup>3</sup>).*
- *No exceedances of PM<sub>10</sub> objectives level were noted during 2023.*
- *No exceedances of the PM<sub>2.5</sub> annual mean level were noted during 2023.*
- *Monitoring results are not in excess of the air quality objectives outside of the existing AQMA's and therefore we are not proposing to amend or designate a new AQMA.*

Also explained in the ASR 2024 that the priority for the coming year is;

- *To put forward the updated AQAP for adoption and revoke the Gaywood Clock AQMA (summer 2024).*

- *To retain Railway Rd AQMA due to transport infrastructure schemes being planned for King's Lynn and need to review their air quality impacts before deciding to retain, amend or revoke the Railway Rd AQMA.*
- *On the basis of these proposed changes in King's Lynn we have decided to purchase an additional continuous air quality monitoring station (Earthsense Zephyr) to monitor NO<sub>2</sub> and help with this detailed assessment work.*

## **2.3 Summary of AQMAs and Workplan:**

### **2.3.1 Railway Road AQMA:**

This initial AQMA was declared on the 01<sup>st</sup> of November 2003 and extended only to a relatively small area along Railway Rd (A148) in the town centre of King's Lynn.

A subsequent further detailed assessment was carried out in 2005 when it was observed that NO<sub>2</sub> exceeded the objective more widely and the area required expanding. An order was made on 02<sup>nd</sup> of February 2007 that varied the original and for the AQMA to extend to all residential properties along Railway Road, Blackfriars Road, and down to the London Road ending at the Southgates. The extent of the AQMA is shown in [Figure C.1](#), Appendix C.

Key trend data within this AQMA over the last 5 years is shown in Appendix C, [Figure C.6](#) and [Figure C.7](#) for the north and south bound sections of the gyratory that forms the AQMA. To help show the spatial variation in NO<sub>2</sub> for example during pre-Covid period (2019) this is also shown in [Figure C.3](#) and [Figure C.4](#).

As can be seen the highest NO<sub>2</sub> occurs along the north bound section of Railway Rd where vehicles (mostly buses) exit the bus station / interchange area at the junction with Albion St and which contributes to the NO<sub>2</sub> pollution within Railway Rd.

Trend data even at this area that experiences the highest NO<sub>2</sub> annual mean concentration shows relatively constant results over the last four years as less than 10% of the objective.

Whilst it is recognised that there has been four years of compliant NO<sub>2</sub> annual mean results within the Railway Rd AQMA, a review of air quality will need to be carried out once the options to the Southgates Masterplan and Gyratory system have been completed and detailed traffic data made available.

This is considered important as a study of the traffic impacts from the West Winch growth area showed NO<sub>2</sub> to increase within Railway Rd AQMA with levels reverting back towards the annual mean objective. The additional study is explained in more detail within Appendix-C of the ASR for 2024.

It should be noted that this assessment was considered worse case as it does not take into account these transport schemes coming forward through the LTP and King's Lynn Transport Strategy, and reason for the more detailed assessment to be undertaken before deciding whether this AQMA should remain, be amended, or revoked.

To assist with this process we have purchased a continuous (indicative) air quality monitoring station (Earthsense Zephyr) to monitor for the NO<sub>2</sub> as well as PM<sub>10</sub>/PM<sub>2.5</sub> close to the area of highest NO<sub>2</sub>. This will help with this more detailed assessment work.

### 2.3.2 Gaywood Clock AQMA

Gaywood Clock AQMA was declared following a further detailed assessment carried in 2008 following the extended declaration to the Railway Rd AQMA and came into effect 6<sup>th</sup> April 2009. It is also formed around residential properties along the A148 that links to Railway Rd but centred around a junction at Gaywood Clock (see [Figure C.2](#), Appendix C).

Spatial distribution of NO<sub>2</sub> annual mean concentrations around the junction for 2019 is shown in [Figure C.5](#) and trends over the last five years presented in [Figure C.8](#) showing results as all less than 30µg/m<sup>3</sup> of the annual mean NO<sub>2</sub> objective.

Furthermore, the last time there was an exceedance in the annual mean objective for NO<sub>2</sub> within this AQMA was in 2010. The concern however had been the extent of traffic rebound following Covid, but as can be seen the annual mean concentrations have remained relatively constant since this period.

Due to the continued compliance of more than 5-years and levels being observed below the 30µg/m<sup>3</sup> annual mean it is not considered necessary or proportionate to retain this AQMA and its AQAP Measure 3.4. It is proposed to be put forward for revocation.

## 3 BCKLWN's Air Quality Priorities

### 3.1 Public Health Context

As detailed in Policy Guidance LAQM.PG22 (Chapter 8) and the National Air Quality Strategy (2023<sup>10</sup>) local authorities are expected to work towards reducing emissions and/or concentrations of PM<sub>2.5</sub> of sources that are within their control.

The evidence base on public health impacts from air quality has grown substantially over the years culminating with the Chief Medical Officer's report for 2022 dedicated solely to air pollution<sup>2</sup>. Air pollution is best thought of as a mixture of gases and particles, all of which may interact and have greater effect if combined.

The pollutant with the strongest epidemiological link to health outcomes is PM<sub>2.5</sub>. This has the ability along with other pollutants like the nitrogen dioxide (NO<sub>2</sub>) to go deep into the lungs and absorbed into the blood stream.

The NO<sub>2</sub> component and which is the focus of this AQAP is inter-linked as it can react in the atmosphere in the presence of other pollutants to form additional secondary PM<sub>2.5</sub>. NO<sub>2</sub> is harmful to human health as it causes irritation of eyes, nose and throat but also respiratory problems from asthma with the potential for reduced lung function at high levels<sup>2</sup>.

Due the combined effects from PM<sub>2.5</sub> it is used as the basis for understanding the context of air pollution through the Public Health Outcomes Framework (PHOF) indicator D01<sup>11</sup>. This indicator derives the proportion of mortalities and associated loss in life years that can be attributed to air pollution as a population weighted average in the area<sup>12</sup>. This relative risk is important as it forms the basis of action through all delivery partners as set out in Norfolk's Joint Strategic Needs Assessment to tackle air pollution in the area.

To help drive forward improvements in air quality the Environment Act 2021 set new national targets for PM<sub>2.5</sub>, that whilst not part of LAQM duties, local authorities are nevertheless tasked to support through the National Air Quality Strategy (2023).

---

<sup>10</sup> NAQS, 2023; <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england/air-quality-strategy-framework-for-local-authority-delivery>

<sup>11</sup> Public Health Outcomes Framework; <https://www.gov.uk/government/collections/public-health-outcomes-framework>

<sup>12</sup> PHE, 2014, Estimating Local Mortality Burdens with Particulate Matter Air Pollution; <https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution>

These national targets on PM<sub>2.5</sub> form the next challenge for work on air quality, as they apply borough wide and therefore mark a change in the context of public health.

The national targets include an annual mean target for PM<sub>2.5</sub> and a population exposure reduction target. Against these targets we compare average annual mean PM<sub>2.5</sub> concentrations for the BCKLWN when based on Defra background maps for the 2023 period (see Table 3.1 below).

In terms of the annual mean target of 10µg/m<sup>3</sup> there are no 1 km grid squares currently that exceed the 2040 10µg/m<sup>3</sup> target level.

However, for the population exposure reduction target, PM<sub>2.5</sub> levels on average will need to reduce to 6.1µg/m<sup>3</sup> by 2040. Levels currently are much higher, and which highlights the extent of work that is still required.

**Table 3.1: National PM<sub>2.5</sub> Targets**

National Target	PM <sub>2.5</sub> National Target measure	BCKLWN Target µg/m <sup>3</sup>	Deadline
Annual Mean target	10µg/m <sup>3</sup> concentration to be achieved nationwide	10µg/m <sup>3</sup>	By 2040
Interim Annual Mean Target	12µg/m <sup>3</sup> concentration to be achieved nationwide	12µg/m <sup>3</sup>	By 2028
Population exposure reduction target	35% reduction in average population exposure compared to 2018 baseline	6.1µg/m <sup>3</sup>	By 2040
Interim Population exposure reduction target	22% reduction in average population exposure compared to 2018 baseline	7.33µg/m <sup>3</sup>	By 2028
	Current average PM <sub>2.5</sub> in BCKLWN (2023) 8.6µg/m <sup>3</sup>		

We do not have direct responsibility to control these concentrations, but many of our measures such those as set out within this AQAP have the potential to reduce PM<sub>2.5</sub>.

To help improve the understanding of the sources of PM<sub>2.5</sub> district-wide and to support these national targets we are looking to develop a health-based project focussing on particulate matter. This project forms the final measure within this updated AQAP (Measure 6.1). It is a partnership with Norfolk County Council's Public Health plus other specialists. The project is still being developed in partnership with these key stakeholders.



Project updates are to be reported within the council's ASRs. This health-based project may also require AQ grant funding.

In terms of measures to reduce average PM<sub>2.5</sub> levels as explained in this year's ASR we are already carrying out the following;

- We review planning applications and where necessary recommend suitable conditions to help mitigate pollution from new developments. To minimise potential impacts from new developments, health damage costs of PM<sub>2.5</sub> and NO<sub>x</sub> can be used to estimate the degree of mitigation and whether any residual offsetting is necessary. This option is explained more fully in Section 3.2 below.
- This Air Quality Action Plan will further help reduce PM<sub>2.5</sub> emissions through measures.
- Implement the King's Lynn Transport Strategy which will help reduce levels of PM<sub>2.5</sub> from the vehicle emissions including secondary PM<sub>2.5</sub> produced from road-NO<sub>x</sub>.
- Regulation of LAPPC prescribed processes through environmental permits to ensure compliance with Best Available Techniques (BAT) and where necessary compliance with any emissions limits.
- We have adopted a Climate Change Strategy and Action Plan and provided a £1,000,000 budget to help implement the Strategy. This work will help reduce carbon emissions but also PM<sub>2.5</sub> emissions through the reduction in fossil fuel usage through:
  - vehicles (via EV charging and active travel alternatives);
  - domestic residential properties (Warm Homes, ECO 3 & 4); and,
  - industry and commercial premises (Business Expo 2022).
- Published advice on Council's website about indoor quality with links to checklists from Asthma and Lung UK to help reduce exposure to the indoor PM<sub>2.5</sub> and other pollutants.
- We continue to work with colleagues within the Norfolk EP group on PM<sub>2.5</sub> work.



- Carry out reviews of National Atmospheric Emissions Inventory (NAEI) submissions<sup>13</sup> to inform other work.

Currently the NAEI shows that the domestic sector burning wood is responsible close to a third of all PM<sub>2.5</sub> emitted in 2021 (17.1kt). National estimates from domestic sources are noted by NAEI to be prone to uncertainty due to lack of comprehensive wood fuel sales data.

Since wood burning from the domestic sector is thought to be responsible for such a large proportion of the total primary PM<sub>2.5</sub> load we have made it easier for individuals to report smoke from chimneys within any of the eight Smoke Control Areas (SCAs) in King's Lynn via an online tool<sup>14,15</sup>.

To help promote best practice within the domestic sector burning wood we promote the national Better Burn, Breathe Better campaign through the council's website. This sets out the types of solid fuel which should be used and how to minimise PM<sub>2.5</sub> emissions. We also participate in Clean Air Day.

For the larger boilers burning wood (>45kW<sub>th</sub>) we assess these individually and maintain an inventory of their emission rates.

### 3.2 Planning and Policy Context

The planning system can play a crucial role in managing and improving air quality and helping with the transition towards a low emission, more sustainable future. Planning policy is a key factor for local authorities in carrying out their air quality functions; close cooperation between planning and air quality officers is therefore essential.

The National Planning Policy Framework (NPPF, 2023) sets out national planning policies and principles for England and how these are expected to be applied, these include the sections within the NPPF;

---

<sup>13</sup> NAEI, UK Informative Inventory Report, [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2303151609\\_UK\\_IIR\\_2023\\_Submission.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2303151609_UK_IIR_2023_Submission.pdf)

<sup>14</sup> SCA reporting tool; [https://www.west-norfolk.gov.uk/info/20137/air\\_quality/633/burning\\_wood\\_and\\_coal](https://www.west-norfolk.gov.uk/info/20137/air_quality/633/burning_wood_and_coal)

<sup>15</sup> Defra UK-Air; <https://uk-air.defra.gov.uk/data/sca/>

- Section 180(e) states that planning decisions should contribute to and enhance the natural and local environment by preventing unacceptable levels of air pollution and wherever possible improve air quality;
- Section 192 that sets out that opportunities to improve air quality or mitigate impacts from new developments should be identified and which sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas' (AQMAs), and ensure that decisions are consistent with the local air quality action plan (AQAP);
- Section 116 that sets out a hierarchy of preference towards more sustainable methods of transport and wherever significant amounts of movement are identified the development will be required to be mitigated via a sustainable travel plan.

The Council has the following local policies that relate to air quality including:

- Policy DM-11 (Environment) which sets out that development should 'protect and enhance the amenity of the wider environment including air quality.'
- Policy CS-11 (Transport) sets out a priority first approach towards local cycling and walking infrastructure and public transport in line with the above NPPF Section 112. This aligns to our Priority 1 Measures. Policy CS-11 also sets out that transport assessments and travel plans are required wherever significant traffic impacts are likely and consistent with to the NPPF.
- Policy CS-08 (Sustainable Development) requires all new development to be of high-quality design which includes measures such as 10% reduction in buildings SAP CO<sub>2</sub> emissions from major developments through renewable / decentralised systems. This policy also favours a reduction of on-site emissions through generation of cleaner energy systems.

The emerging Local Plan aims to adopt Polices CS-11 and DM-11 under policies LP-21 and LP-13 respectively.

There are also Norfolk CC guidelines that we refer to on transport interventions such as travel plans<sup>16</sup>, transport assessments<sup>17</sup> and parking guidelines<sup>18</sup> which includes a section on electric vehicle charging infrastructure.

In terms of this AQAP:

- Previous AQAP Measures (2 and 3) are not taken forward within this updated version with reasons given in Appendix B Table B.1.
- Measure 5.1 (To consider AQ from new developments). This is considered an important measure and has been updated. The council's ASR will provide an update on this measure annually (number of planning applications considered for air quality in the year).

## **3.3 Source Apportionment**

### **3.3.1 Source Apportionment of the AQMA's**

The AQAP measures presented in this report are intended to be targeted towards the main source of the NO<sub>2</sub>.

Principal sources have shown by a source apportionment study carried out by Bureau Veritas (2017<sup>19</sup>). The study was based on DfT traffic count data (DfT, 2016<sup>20</sup>) from road links selected within King's Lynn and calculating the relative proportions of NO<sub>2</sub> and NO<sub>x</sub> using Defra's Emission Factor Toolkit (EFT v.8) based on the proportions of cars and taxi's, LDV's, buses and coaches and HGVs along these road links.

Apportioning the NO<sub>2</sub> and NO<sub>x</sub> was presented for all modelled receptor locations and also locations with highest concentrations to compare any variation spatially as shown in Fig 3.2 and Fig 3.2 below:

---

<sup>16</sup> NCC Travel Plan Guidance; <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/travel-plans>

<sup>17</sup> NCC, Safe, Sustainable Development; <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/publications>

<sup>18</sup> NCC, Parking Guidelines, 2022; <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/publications>

<sup>19</sup> BCKLWN, 2017, Source Apportionment Study; [https://www.west-norfolk.gov.uk/downloads/download/346/air\\_quality\\_information\\_documents](https://www.west-norfolk.gov.uk/downloads/download/346/air_quality_information_documents)

<sup>20</sup> Dept. of Transport Road Traffic Statistics; <https://roadtraffic.dft.gov.uk/manualcountpoints/70303>

Fig 3.1: Source Apportionment for Railway Rd AQMA

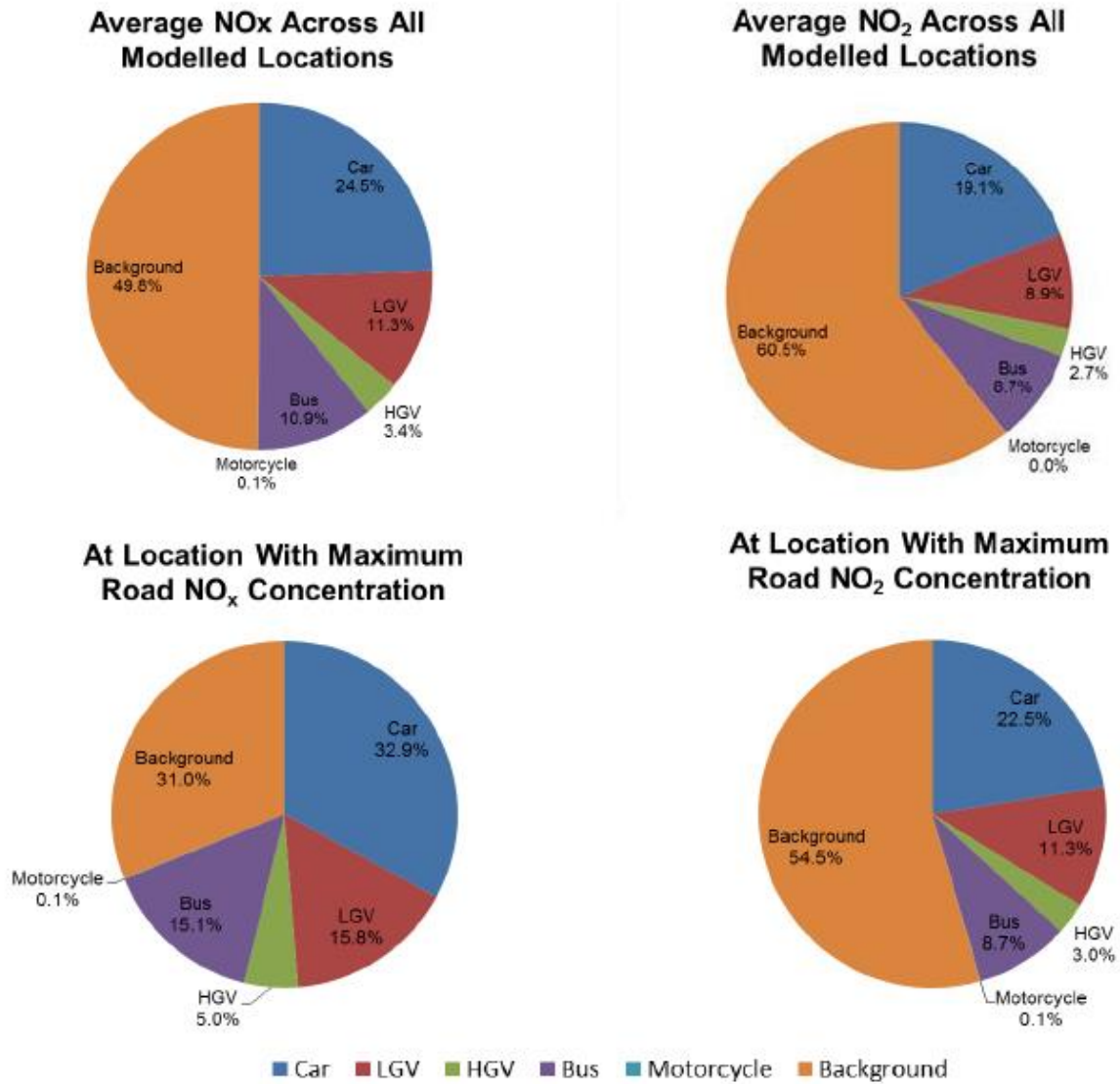
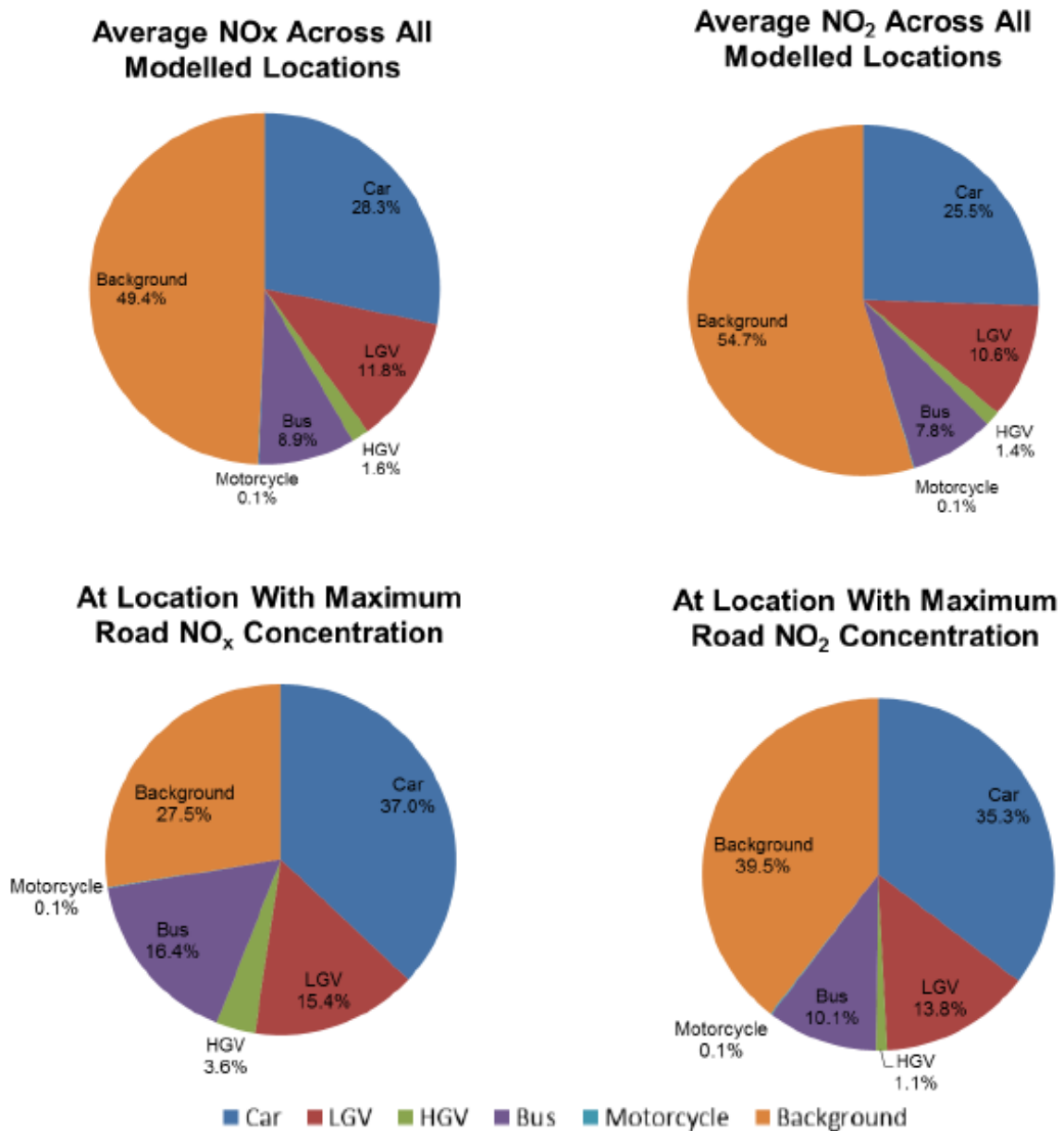


Fig 3.2: Source Apportionment for Gaywood Clock AQMA



When considering % reductions it is preferable to refer to the proportions as NO<sub>x</sub> than NO<sub>2</sub> due to the primary emission from vehicles is in the form of NO<sub>x</sub>. The relationship between the NO<sub>x</sub>:NO<sub>2</sub> concentrations is non-linear. AQAP measures within Table 5.1 have been prioritised by NO<sub>x</sub>.

In terms of the source apportionment study:

- When based on all locations the predominant source for the NO<sub>x</sub> was from other sources that the main road links modelled i.e. suggestive of a wider

pollution source. To help address this issue, the proposed air quality project in Measure 6.1 will review NO<sub>x</sub> as well as the particulate matter emissions district wide.

- At the locations with highest NO<sub>x</sub> around two-thirds of the total NO<sub>x</sub> was attributed to vehicles. In particular, cars formed the largest proportion of NO<sub>x</sub> and NO<sub>2</sub> when compared to all vehicles. This is reflected in the priorities within the AQAP that favour active travel / modal shift i.e. that aim to reduce traffic than manage.
- Whilst the largest contribution in terms of vehicle NO<sub>x</sub> was from cars, buses contributed to around half of this NO<sub>x</sub>. With such a high proportion of total road-NO<sub>x</sub> being attributed to buses is reason to specifically target this source group through Measure 2.2.

### 3.3.2 Source apportionment of PM<sub>10</sub> and PM<sub>2.5</sub>

A source apportionment study for particulate matter is not necessary for this AQAP as it is based on measures primarily aimed at reducing NO<sub>2</sub>. However, we intend to carry out a source apportionment study into particulate matter emissions across the district as part of the Measure 6.1 (to help develop the West Norfolk air quality project).

## 3.4 Required Reduction in Emissions

There is no requirement to express NO<sub>2</sub> (µg/m<sup>3</sup>) required reduction as results are currently compliant.

## 3.5 Key Priorities

### Priory 1 – Accelerating modal shift to public and active transport.

We have prioritised measures that are associated with reducing traffic as vehicles were identified as the predominant source of NO<sub>x</sub> / NO<sub>2</sub> in the AQMAs from the source apportionment study. Reducing traffic flows will also be associated with ancillary benefits to climate change policies and help reduce the contribution from domestic greenhouse gas emissions (GHG). According to the Dept. of Transport in its Decarbonising Transport, for a Better, Greener Future (2021<sup>21</sup>) transport was the largest contributor to UK *domestic* greenhouse gas (GHG) emissions, responsible for 27% in 2019. Locally this was reported as slightly higher at 29% in 2018<sup>22</sup>.

In order to reduce the impact from this sector we need to encourage and facilitate active travel for short journeys (or as part of a longer journey) where practicable, in combination with a reduced need to travel. AQAP measures 1.1 – 1.6 are focussed on a modal shift away from private vehicles towards public transport and active travel. The measures are underpinned by the Local Cycling and Walking Infrastructure Plan for King's Lynn.

Every vehicle trip that can be replaced by walking, cycling or public transport helps free up limited road space for trades and public transport including buses, taxis, internet deliveries, tradespeople, carers, and food distribution. The journeys below five miles represent 58% of all private car journeys in U.K. in 2019 (DfT, 2021) and provide the biggest opportunity for switching short car journeys to cycling and walking.

The Chief Medical Officer's Annual Report that was dedicated to air quality in 2022 (CMO, 2022<sup>2</sup>) highlighted this issue that by reversing some of the decline in bicycle trips as shown in Figure 3.3 would have substantial health benefits due to physical activity being built into the normal day in addition to a reduction in air pollution.

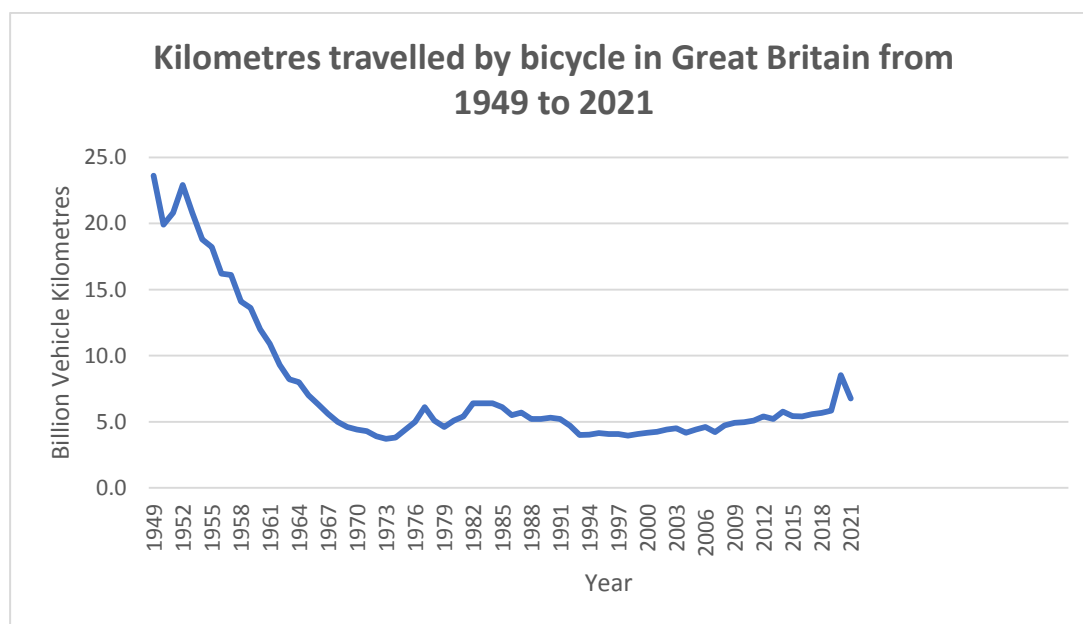
---

<sup>21</sup> Dept. of Transport, Decarbonising Transport – A Better Greener Britain; [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)

<sup>22</sup> BCKLWN Climate Change emissions; [https://www.west-norfolk.gov.uk/info/20095/energy\\_and\\_climate\\_change/920/west\\_norfolk\\_emissions](https://www.west-norfolk.gov.uk/info/20095/energy_and_climate_change/920/west_norfolk_emissions)



Fig 3.3: Reduction in active travel 1949-2021



Moreover, during the pandemic many workplaces adopted measures to help staff work from home yet only 1182 active travel plans have been reported as being registered with the nationally accredited Modeshift Stars scheme<sup>23</sup>. So, whilst engine technology improvements will help, more needs to be done, especially when domestic GHG emissions from transport as reported by DfT (2021) have been broadly flat for the last 30 years. This council for example plans to develop a green travel plan as part of its post Covid recovery plan (Measure 1.2) and climate change initiatives.

In addition, around the Gaywood Clock AQMA there are a number of schools plus the main hospital for King's Lynn (Queen Elizabeth Hospital) situated directly off from the junction. Prioritising active travel plans for the schools and Hospital will help alleviate some of the traffic congestion.

This Council also has an Active and Clean Connectivity Plan<sup>24</sup> comprising three key elements; to develop two active travel hubs in the area; deliver priority schemes within the local cycling and walking infrastructure plan (LCWIP<sup>25</sup>) and to work with a number of businesses to help facilitate workplace travel plans. Working with local businesses on the plans will also help to help understand any barriers for wider

<sup>23</sup> Modeshift Stars; <https://modeshift.org.uk/modeshift-news/modeshift-stars-accreditation-hits-record-numbers/>

<sup>24</sup> <https://www.visionkingslynn.co.uk/projects/active-and-clean-connectivity/>

<sup>25</sup> NCC, LCWIP; <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-transport/kings-lynn-lcwip-main-report-february-2022.pdf>



implementation. Analysis of the travel plans has been carried out Mobilityways (2024). The borough council has secured £6.7m towards the Active & Clean Connectivity Programme through Towns Fund and the Norfolk Business Rates Pool.

**Priority 2 – Public Transport improvements:**

To help with the move towards increased active travel / modal shift we have prioritised public transport improvements in priority 2. The measures include NCC's Bus Service Improvement Plan (BSIP) measures in Measure 2.1.

Reducing the NO<sub>x</sub> contributions from buses in King's Lynn is also proposed in Measure 2.2 as bus emissions contribute a high proportion of the total road-NO<sub>x</sub> within Railway Rd AQMA. Measure 2.2 is currently unfunded but is supported by NCC public health, to identify funding through DfT's Zero Emission Bus funding for Regional Areas (ZEBRA<sup>26</sup>).

**Priority 3 – Transport Management Improvements:**

To help improve air quality and enable the required mode shift to public transport and active travel modes, a number of transport infrastructure improvements are planned for the centre of King's Lynn. Funding (£24m) has been secured by Norfolk CC to implement transformational schemes with the town centre's gyratory system and at the Southgates, which will provide significant infrastructure improvements for buses, walking, cycling and public realm to encourage modal shift.

These changes in transport movements however have the potential to impact the Railway Rd AQMA and therefore we have included AQAP measures (3.1 and 3.2) to review the proposals for air quality once detailed traffic information is available.

In addition, to help manage parking in the area this council will also develop a car parking strategy for the area and where air quality can be considered (Measure 3.3).

**Priority 4 – Review of new planning developments:**

The National Air Quality Strategy (2023) which local authorities must have regard to expects that developments emit the minimum amount of pollution over their scheme lifetimes. To help prevent new developments from contributing to the problem and to

---

<sup>26</sup> DfT ZEBRA funding; <https://www.gov.uk/government/publications/apply-for-zero-emission-bus-funding-zebra-2>

improve air quality wherever possible in line with the NPPF, this AQAP also prioritises this workstream.

We will endeavour to identify any additional measures to mitigate emissions at an early stage. Any obligations will be proportionate to the nature and scale of the development proposed and the level of concern about air quality. The pollutants (PM<sub>2.5</sub> and NO<sub>x</sub>) can be assigned a value based on their damage cost estimates but which will typically be over a 30-year time frame to reflect lifetime of development. Any mitigation / offsetting is to be determined on a case-by-case basis.

#### **Priority 5 – Public awareness:**

Following the inquest into the death of Ella Roberta Adoo-Kissi-Debrah on 21st April 2021 the coroner's report (2021<sup>27</sup>) raised low public awareness of information on air quality as an area of concern. Public awareness of air quality was also considered poor as explained by Public Accounts Committee report (2022<sup>28</sup>) on tackling air quality breaches.

A range of interventions are to be developed to better engage the public on air quality as listed with Measures 5.1, 5.2, of which improved air quality monitoring systems forms part.

#### **Priority 6 – West Norfolk Air Quality Project:**

An air quality project is the final priority of this AQAP as it will set out measures for how we will facilitate improvements in air quality district-wide with emphasis on particulate matter (PM<sub>10</sub> & PM<sub>2.5</sub>).

---

<sup>27</sup> Judiciary Report to Prevent Future Deaths, 2021; <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

<sup>28</sup> Public Accounts Committee, 2022, [Tackling local air quality breaches](#):

## 4 Development and Implementation of BCKLWN AQAP

### 4.1 Consultation and Stakeholder Engagement

In updating this AQAP we have worked with local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies as listed in Table 4.1.

In developing this Air Quality Action Plan and its updated measures, we have already gone out to public consultation<sup>29</sup> that included an online questionnaire and two officer-led face to face public drop-ins held at Gaywood Library and Central Library in King’s Lynn.

The response to our consultation stakeholder engagement is given in Appendix A (Table A.1).

**Table 4.1– Consultation Undertaken**

Yes/No	Consultee
Yes	Secretary of State
No <sup>(a)</sup>	Environment Agency
Yes	Norfolk County Council (local Highways Authority, Public Health)
No <sup>(b)</sup>	National Highways Authority
Yes	all neighbouring local authorities
Yes	bodies representing local business interests and other organisations as appropriate;

(a) Note: Source apportionment study of the AQMA’s did not show any permitted activities that are regulated by the Environment Agency as contributing to NOx emissions in the AQMAs.

(b) National Highways are not affected by the Measures.

<sup>29</sup> BCKLWN consultation on draft AQAP; <https://www.west-norfolk.gov.uk/qaqap-consultation>

## 4.2 Steering Group

Governance of the AQAP comprises the following sections with responsibilities as set out below. Updates to transport related measures can be reported through the King's Lynn Area Transport Strategy (KLATS) group:

**a) Overall responsibility for the AQAP:**

Environmental Quality, BCKLWN

**b) Directorship:**

Environment & Planning, BCKLWN

**c) Corporate Senior Management Team:**

Borough Council of King's Lynn and West Norfolk

**d) Cabinet Member**

Environment (Air Quality Strategy) portfolio holder

**e) West Norfolk Transport Infrastructure Steering Group**

Joint Member Steer (BCKLWN / Norfolk CC)

**f) King's Lynn Area Transport Strategy Group (KLATS)**

Joint working group between BCKLWN & Norfolk CC and relevant advisers

**g) Public Health**

Norfolk CC, Public Health, Community and Environmental Services

**h) Local Highways Authority**

Norfolk CC

## 5. AQAP Measures

Table 5.1 shows the BCKLWN AQAP measures. It contains:

- a list of the actions that form part of the plan.
- the responsible individual and departments/organisations who will deliver this action.
- estimated cost of implementing each action (overall cost and cost to the local authority)
- expected benefit in terms of pollutant emission and/or concentration reduction based on NO<sub>x</sub>:
  - **Low** – Action focussed on a small proportion of NO<sub>x</sub>.
  - **Medium** – Action focussed on a measure with the potential to have more significant impact on NO<sub>x</sub> emissions than those shown as low.
- the timescale for implementation
- how progress will be monitored

**NB:** Please see future ASRs for regular annual updates on implementation of these measures.

Table 5.1: Air Quality Action Plan Measures:

Priority & Measure No.	Measure	Category	Classification	Estimated Year of Introduction	Estimated Completion Year	Organisations Involved	Funding Source	Defra AQ Grant Funding	Funding Status	Estimated Cost of Measure	Measure Status	Target Reduction in Pollutant / Emission from Measure	KPI	Progress to Date	Comments / Potential Barriers to Implementation
1.1	Improve active travel promotion to schools	Promoting Travel Alternatives	School Travel Plans	2024	On-going	NCC Schools	NCC	No	Partially Funded	< £10k	Planning	NO2 / PM2.5 - Low	No. of schools around AQMAs with active travel plans		NCC to provide nationally accredited Modeshift Stars toolkit to all schools so they can generate and manage their own travel plans, as well as offering a range of other measures such as Bikeability and other on-line learning tools (Step on It, Ride on It, Seat Belt Safety).
1.2	To develop a BCKLWN Travel Plan	Promoting Travel Alternatives	Workplace Travel Planning	2024	On-going	BCKLWN Sustrans	BCKLWN	No	Partially Funded	< £10k	Planning	NO2 / PM2.5 - Low	Outcome(s) to be agreed from adopted / active TP	TP is being developed as part of post Covid Recovery Plan	Developing a green travel plan forms part of the council's Climate Change Strategy. This will focus on commuting and business travel. The council are already working with Sustrans on developing the plan.
102 1.3	Development of other workplace / business travel plans	Promoting Travel Alternatives	Encourage / Facilitate homeworking	2024	2029	BCKLWN Private businesses	Town Deal and Business Rate Pool	No	Partially Funded	£50k - £100k	Planning	NO2 / PM2.5 - Low	No. of other workplaces with active travel plans	Mobilityways commissioned to analyse travel plans.	BCKLWN to work with a number of businesses (6) to help implement workplace travel plans but also to assess the barriers to implementation. Measure forms part of Council's Active and Clean Connectivity project funded through the £6.1m Town Deal and Business Rates Pool; <a href="https://www.visionkingslynn.co.uk/project/s/active-and-clean-connectivity/">https://www.visionkingslynn.co.uk/project/s/active-and-clean-connectivity/</a>
1.4	Development of Active Travel Hubs	Transport Planning and Infrastructure	Intensive active travel campaign & infrastructure	2024	On-going	BCKLWN NCC	Town Deal & Business Rate Pool	No	Partially Funded	£1m - £10m	Planning	NO2 / PM2.5 - Low	No. of Active Travel Hubs	Design & Build Stage RIBA Stage 4 underway.	Phase-1 comprises the Nar Ouse Enterprise Zone in South Lynn, followed by Phase-2 with a travel hub within the existing Baker Lane Carpark; <a href="https://www.visionkingslynn.co.uk/project/s/active-and-clean-connectivity/">https://www.visionkingslynn.co.uk/project/s/active-and-clean-connectivity/</a>

## Borough Council of King's Lynn and West Norfolk

1.5	Implement the local cycling and walking infrastructure plan (LCWIP)	Promoting Travel Alternatives	Intensive active travel campaign & infrastructure	2024	2030	NCC BCKL WN	A&CC Town Deal project	No	Partially Funded	£1m - £10m	Planning	NO2 / PM2.5 - Low	Extent of Infrastructure / No. of LCWIP schemes.	LCWIP is to provide better N-S and E-W connectivity and improved access to rail and bus stations. Some of these measures are funded (£3m) through the Active & Clean Connectivity Plan (A&CC); others require external funding, including development through STARS project. Public consultation carried out in Feb 2022.	
1.6	Support Use of West Lynn Ferry	Promoting Travel Alternatives	Promote use of rail and inland waterways	2024	On-going	BCKL WN NCC	TBC based on successful business case	No	Not Funded	Unknown - TBC	Planning	NO2 / PM2.5 - Low	Continued operation of Ferry Service with funding where necessary to support	Feasibility study funded. To continue the operation of the Ferry Service and linked to parking strategy (Sail and Park). BCKLWN and NCC have jointly funded a feasibility study into ferry infrastructure improvements.	
103	2.1	Work with Norfolk County Council to help deliver their Bus Service Improvement Plan (BSIP)	Transport Planning and Infrastructure	Public transport improvements - interchanges stations and services	2024	2025	NCC Bus Operators	DfT Bus Back Better	No	Funded	> £10m	Planning	NO2 / PM2.5 Low - Medium	£50m DfT funding secured	A range of bus infrastructure and support measures have been identified that have DfT funding. measures include cheaper fares for under 25's, new bus lanes, travel hubs e.g. in Hunstanton.
	2.2	Zero Emission Buses in King's Lynn	Promoting Low Emission Transport	Public Vehicle Procurement - Prioritising uptake of low emission vehicles	2024	On-going	NCC Bus Operators	DfT ZEBRA funding	No	Not Funded	Unknown - TBC	Planning	NO2 / PM2.5 - Medium	No. of zero emission buses	Following review of NO2 source apportionment study in 2017 by Bureau Veritas it showed buses account for almost half of the road-NOx from cars but are a fraction of the total number within the AQMA's. Securing zero emission buses will help to reduce any disproportionate effect. Measure is supported by NCC, including Public Health. NCC will work with partners to apply for funding as opportunities arise.
3.1	Review changes to the road system within the King's Lynn Town Centre gyratory system (Railway Rd AQMA).	Traffic Management	UTC, Congestion management, traffic reduction	2024	2025	NCC BCKL WN	NCC Levelling Up Fund 2 (£24m)	No	Partially Funded	< £10k	Planning	Reduction in NO2/PM2.5 is dependent on AQ Modelling against preferred option(s)	Continued NO2 monitoring, with aim for downward trends	Plans at high level. Estimated cost £5.5m	Highest concentration of NO2 in King's Lynn occurs along Railway Rd within the Gyratory System of the Town Centre. Plan is to redesign the gyratory system with improved cycle and walking as needed for the town centre and a re-routing of buses. AQ assessment to be carried out once detailed traffic data is made available from project team.

## Borough Council of King's Lynn and West Norfolk

3.2	Review traffic related changes as part of the Southgates Masterplan	Traffic Management	UTC, Congestion management, traffic reduction	2024	2025	NCC BCKL WN	NCC Levelling Up Fund 2 (£24m)	No	Partially Funded	< £10k	Planning	Reduction in NO2/PM2.5 is dependent on AQ Modelling against preferred option(s)	Continued NO <sub>2</sub> monitoring, with aim for downward trends	Plans at high level. Estimated cost £21m	Plan is to reconfigure the existing Southgates roundabout to a form that is better suited to public transport and active travel modes. AQ assessment to be carried out once detailed traffic data is made available from project team
3.3	Develop and implement a comprehensive Car-Parking Strategy for King's Lynn	Traffic Management	UTC, Congestion management, traffic reduction	2024	On-going	BCKL WN NCC	BCKLWN	No	Funded	Unknown - TBC	Planning	NO <sub>2</sub> / PM <sub>2.5</sub> - Low	TBC	AECOM Draft Strategy prepared	Air quality matters are to be considered within draft car parking strategy.
3.4	Review measures to improve traffic flows through Gaywood-Clock AQMA.	Traffic Management	UTC, Congestion management, traffic reduction	2024	2024	NCC BCKL WN	LTP	No	Funded	Unknown - TBC	Planning	NO <sub>2</sub> / PM <sub>2.5</sub> - Low	Optimise queue lengths at Gaywood-Clock junction	LTP4	Air Quality Management Area to be reviewed as per ASR 2023. Levels in the Gaywood-Clock AQMA have been below the NO <sub>2</sub> annual mean objective for more than 5 years.
4.1	To consider air quality from new developments and secure mitigation	Policy Guidance and Development Control	Air Quality Planning and Policy Guidance	2024	On-going	BCKL WN	BCKLWN	No	Funded	< £10k	Implementation	Minimum amount of pollution from schemes lifetime	No of planning application considered per year	Reported annually in ASR	Measure previously targeted applications within or adjacent to AQMA. In practice any development of potential material concern for air quality is within scope. Planning procedure ensures that effective mitigation is secured from each development in accordance with NAQS (2023) and best practice guidance.
5.1	Promote behaviour change from individuals and employers	Public Information	Via the Internet	2024	On-going	NCC Public Health BCKL WN	NCC	No	Partially Funded	Unknown - TBC	Implementation	NO <sub>2</sub> / PM <sub>2.5</sub> - Low	Increased awareness		Engage the public through a behaviour change programme, including the use of social media to be more aware of taking personal responsibility for reducing air pollution through a number of measures (anti-idling, NCC journey planning toolkit, working with schools, Clean Air Day, Defra Burn Better, Breathe Better and indoor AQ etc.). Public Health to offer training to embed techniques in policy development.
5.2	Improve Public Awareness (Air Quality Monitoring and Information)	Public Information	Via the Internet	2024	On-going	NCC Public Health BCKL WN	BCKLWN	No	Partially Funded	Unknown - TBC	Implementation	NO <sub>2</sub> / PM <sub>2.5</sub> - Low	Increased Awareness of Air Quality	Draft Strategy	Raising public awareness is recognised as an important function of the air quality work of which improved air quality monitoring forms part. To investigate options to raise public awareness of air quality in light of changing public health context as informed by improved AQ monitoring and information systems.



Borough Council of King's Lynn and West Norfolk

6.1	To develop an Air Quality Project to review the impact of PM10 and PM2.5 across the district.	Public Information	Via the Internet	2024	On-going	NCC Public Health BCKL WN	DEFRA BCKLWN NCC	Yes	Funded	Unknown - TBC	Planning	NO2 / PM2.5 - Low	Completion of project	Project being scoped with partners	Develop a project to review, monitor and reduce levels of PM10 & PM2.5. To work with Public Health and any others in defining the role.
-----	---	--------------------	------------------	------	----------	------------------------------------	------------------------	-----	--------	---------------	----------	-------------------	-----------------------	------------------------------------	---

DRAFT

## Appendix A: Response to Consultation

Table A.1 Summary of Responses to Consultation and Stakeholder Engagement on the AQAP

Consultee	Category	Response	Comment
Refer to separate spreadsheet (Appendix A):			

DRAFT

## Appendix B: Reasons for Not Pursuing Action Plan Measures

Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision:

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Measure No.2	With regard to National Planning Policy Framework, include air quality considerations in the Local Plans and adopt an air quality Development Management Policy.	Air quality policy is adopted through policies DM-11 and CS-11. Emerging local plan is to adopt DM-11 and CS-11 into new policies (LP-21 and LP-13). Local plans consider air quality.
Measure No.3	With regard to National Planning Policy Framework, adopt Norfolk Technical Guidance on Air Quality and provide pre-application advice on planning applications	Aim was to refer to development control guidance produced locally through Norfolk AQ group. The measure is not being pursued as the local guidance document has since been superseded by the updated IAQM (2017) guidance on development control.
Measure No.5	New access road (Hardings Way).	Measure included option to open Hardings Way to some additional vehicles that would otherwise travel along the London Rd and through the AQMA. This measure is not being pursued following completion of a feasibility study completed by WSP in 2020 that concluded it would not be a viable option to open the road to general through traffic. The route still provides essential bus / accessible vehicle only route and forms part of NCN No.1 (a priority route in the LCWIP). It is popular for walking / cycling. Changing the use would be considered retrograde and against national policy of supporting public transport, walking and cycling.

107

Measures No.7 and No.8	Implementation of Urban Traffic Control system (UTC) at principal junctions within AQMA and adjacent to AQMA	Aim of the measure was to reduce emissions within the AQMA from stop/start driving through improved traffic light / detection systems. The measure is not being pursued as an additional specific intervention as both the UTC and also Selective Vehicle Detection Systems have been implemented. Traffic control systems will form part of revised traffic management measures (Nos.3.1 and 3.2) and therefore not necessary to have stand-alone measure.
Measure No.9	Decriminalisation of parking. Review of parking controls and enforcement in AQMAs and King's Lynn Town Centre (Linked to 4, 10, 11 & 12)	Measure consolidated into Measure No.3.3 (To Develop Comprehensive Car Parking Strategy for King's Lynn).
Measure No.10	Variable car parking rates (Linked to 4, 9, 11 & 12)	Measure consolidated into Measure No.3.3 (To Develop Comprehensive Car Parking Strategy for King's Lynn).
Measure No.11	Variable message signs (Linked to 4, 9, 10 & 12)	Measure has been completed with real-time parking signs to direct people to where spaces are located.
Measure No.12	Investigate potential for residents only parking in or close to AQMAs (Linked to 4, 9, 10 & 11)	Measure consolidated into Measure No.3.3 (To Develop Comprehensive Car Parking Strategy for King's Lynn).

108

## Appendix C:

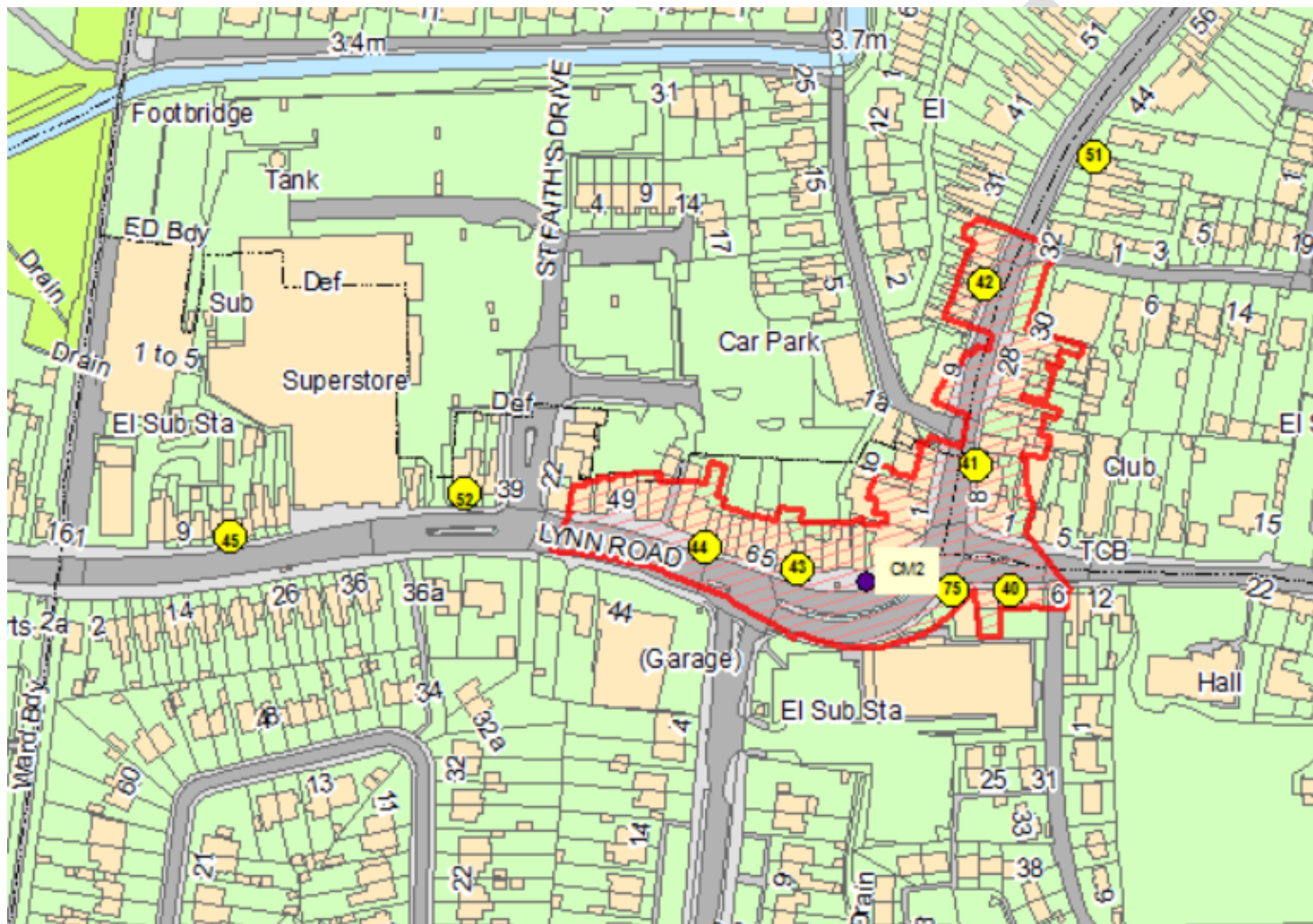
Figure C.1: Map of Railway Rd AQMA and location of monitoring sites



Crown Copyright and database rights 2018 Ordnance Survey 100024314



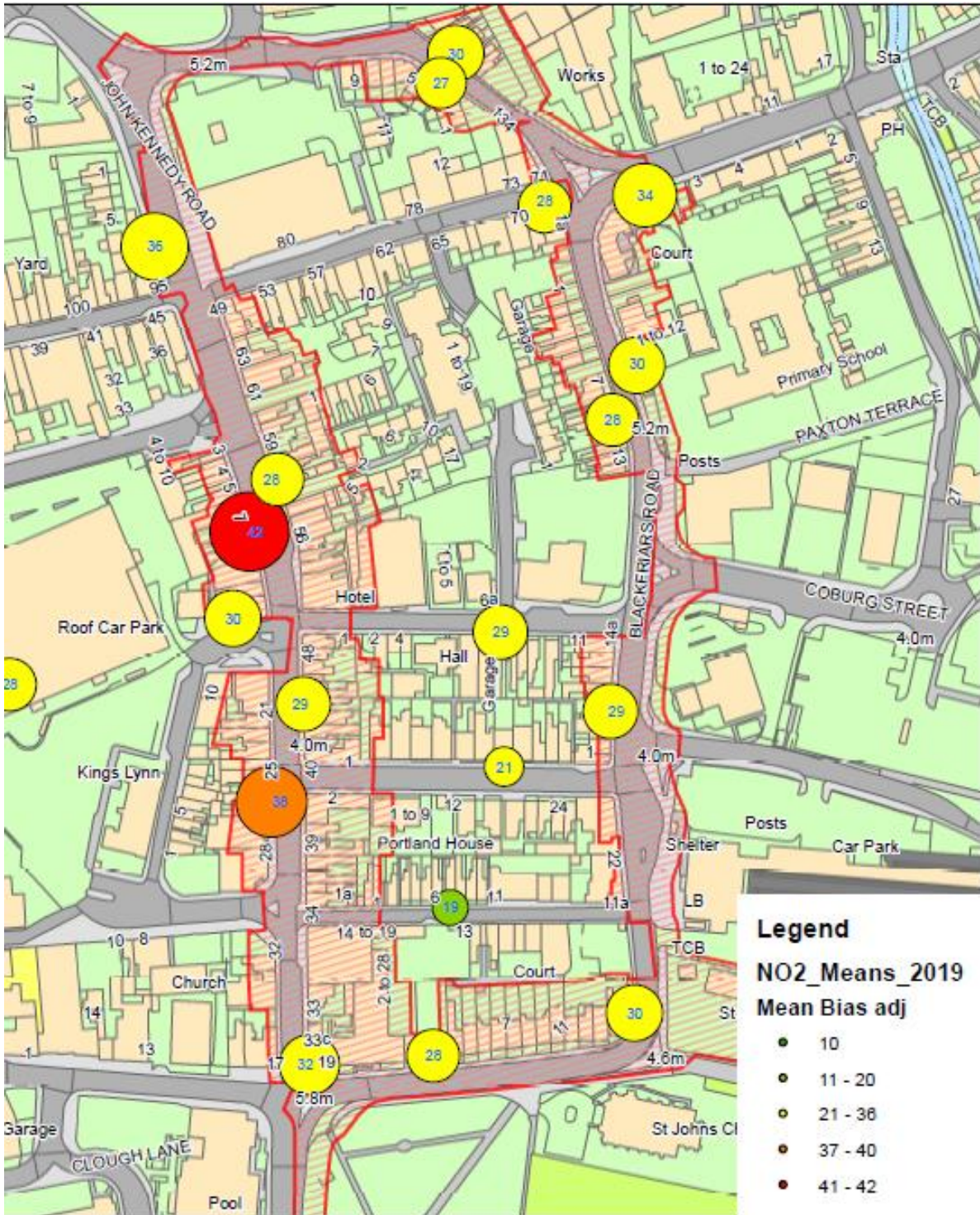
Figure C.2: Map of Gaywood Clock AQMA and location of monitoring sites



110

Crown Copyright and database rights 2018 Ordnance Survey 100024314

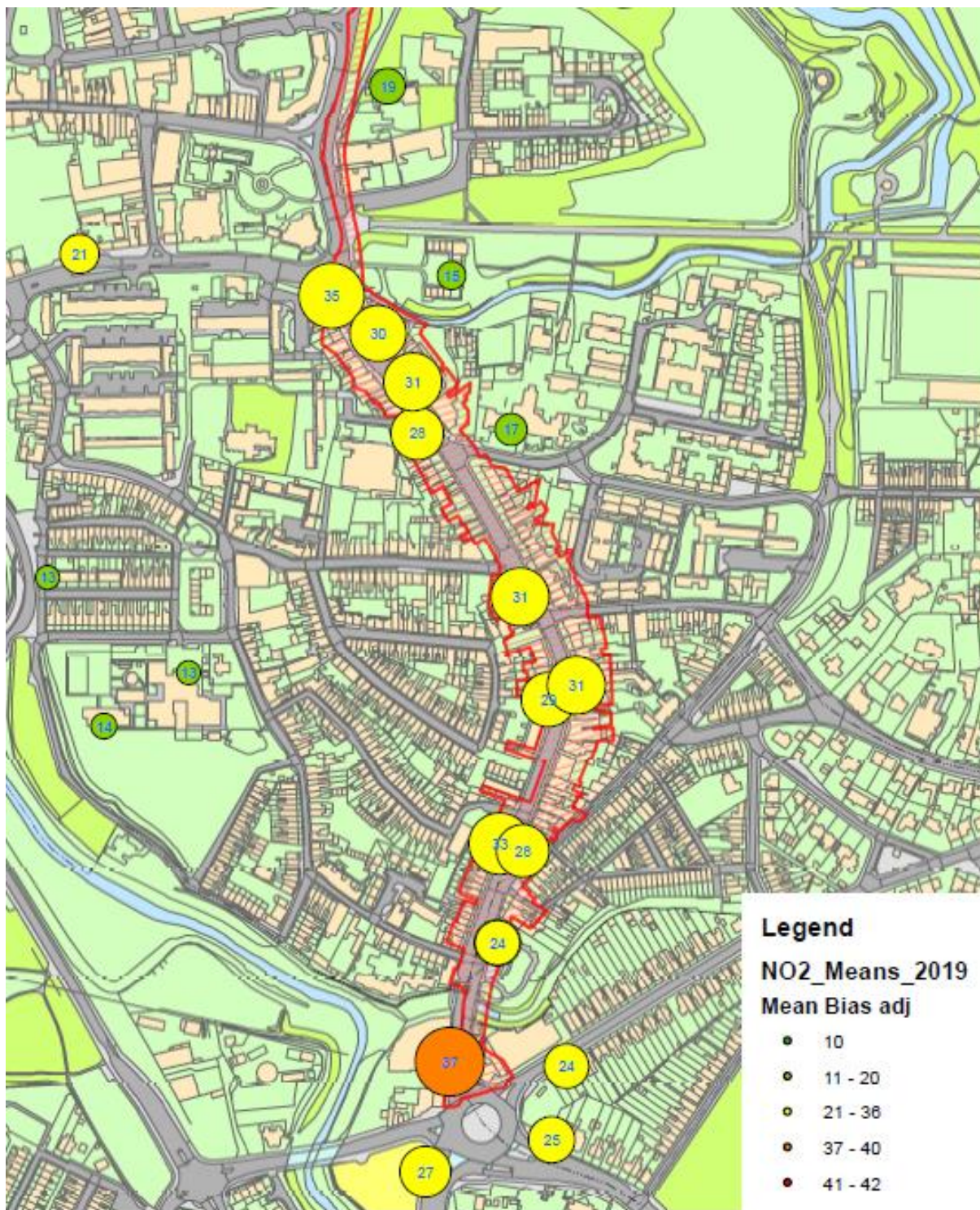
Figure C.3: Spatial Distribution of NO<sub>2</sub> (annual mean ug/m<sup>3</sup>) around Railway Rd AQMA



Crown Copyright and database rights 2018 Ordnance Survey 100024314



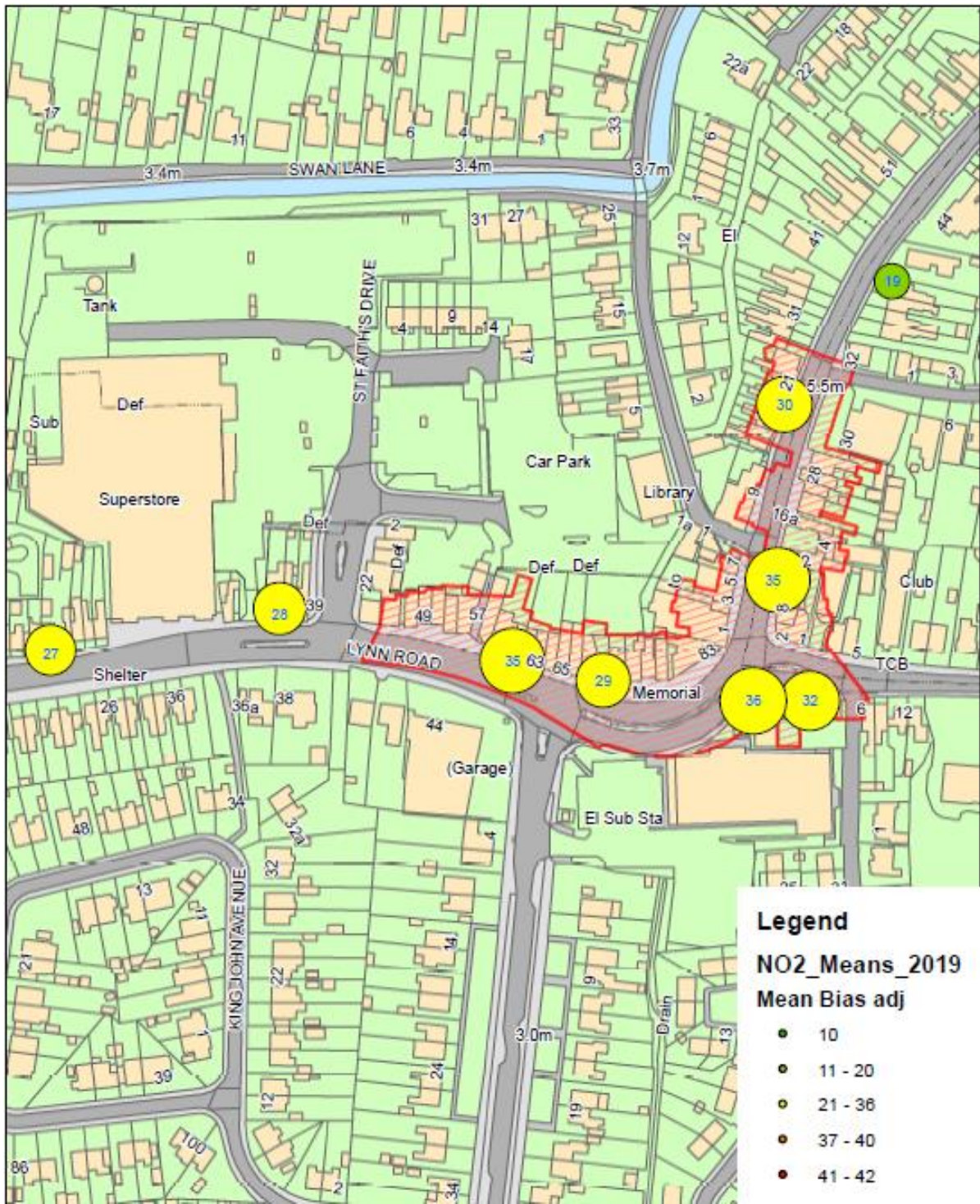
Figure C.4: Spatial Distribution of NO2 (annual mean ug/m<sup>3</sup>) around southern section of the Railway Rd AQMA



Crown Copyright and database rights 2018 Ordnance Survey 100024314



Figure C.5: Location of Gaywood Clock AQMA and spatial distribution by diffusion tube results (as 2019 annual mean  $\mu\text{g}/\text{m}^3$ ).



Crown Copyright and database rights 2018 Ordnance Survey 100024314

Figure C.6: Trends in NO2 annual mean ( $\mu\text{g}/\text{m}^3$ ) along North bound section of Railway Rd AQMA;

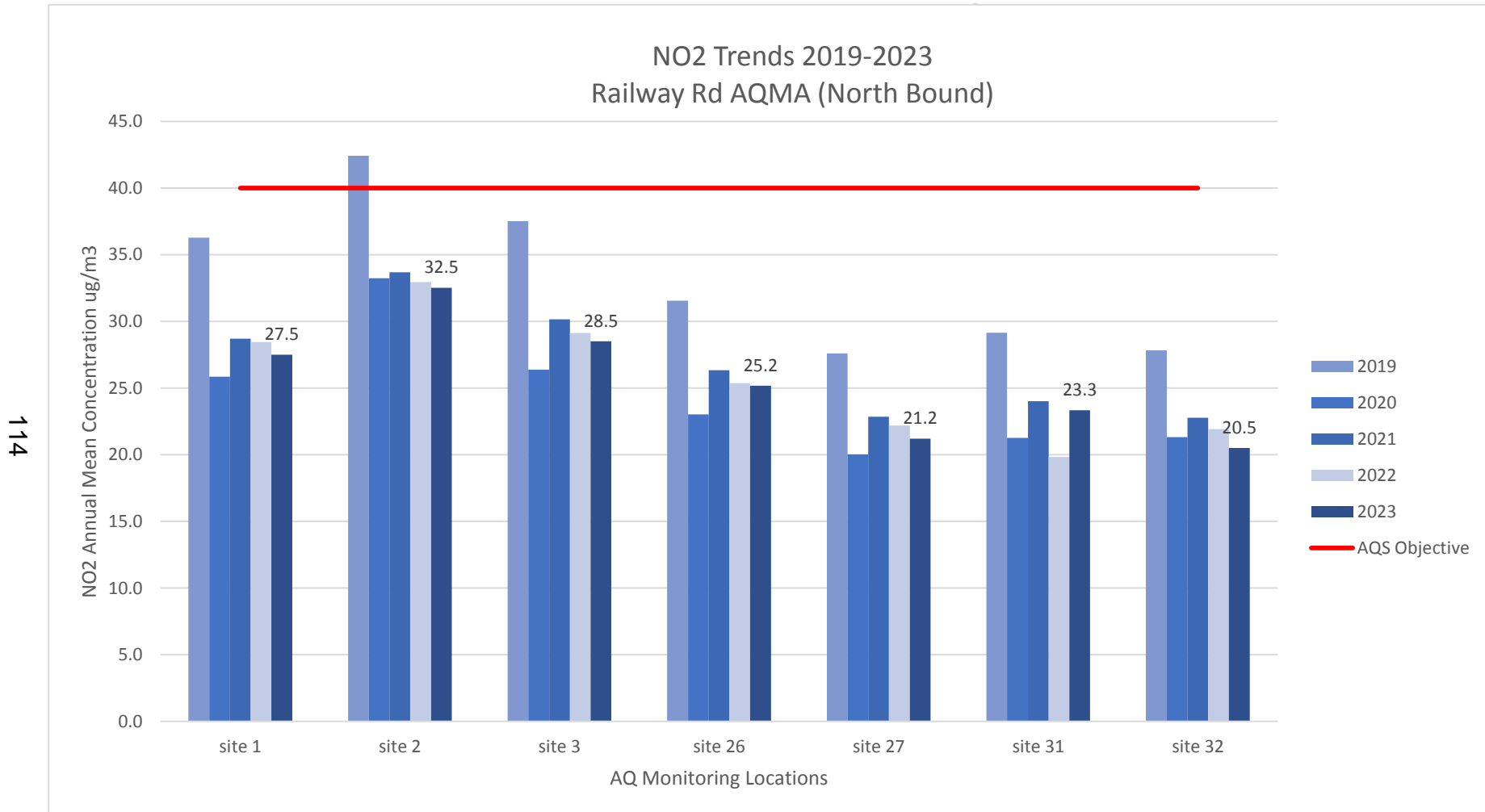


Figure C.7: Trends in NO2 annual mean ( $\mu\text{g}/\text{m}^3$ ) along south bound section of Railway Rd AQMA;

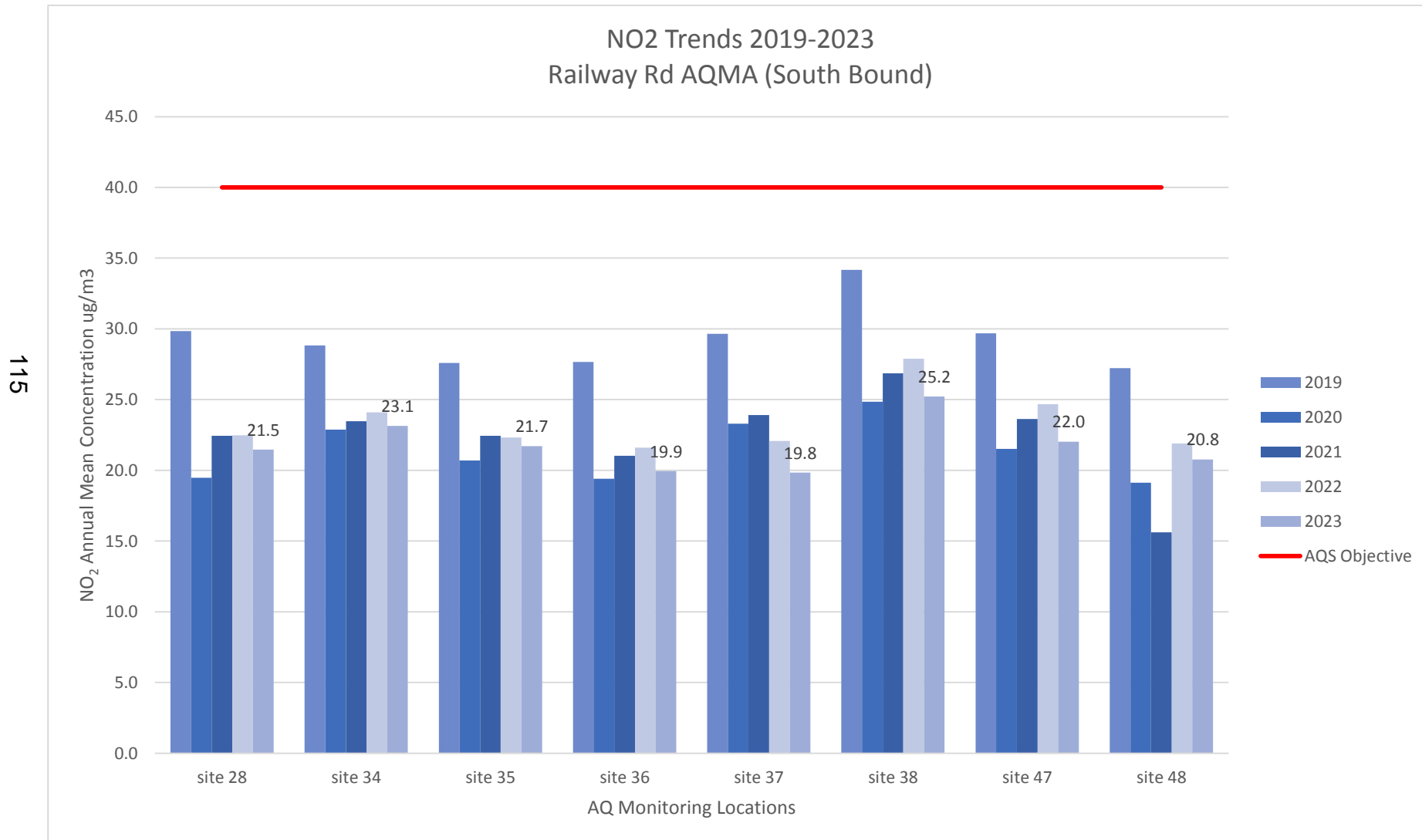
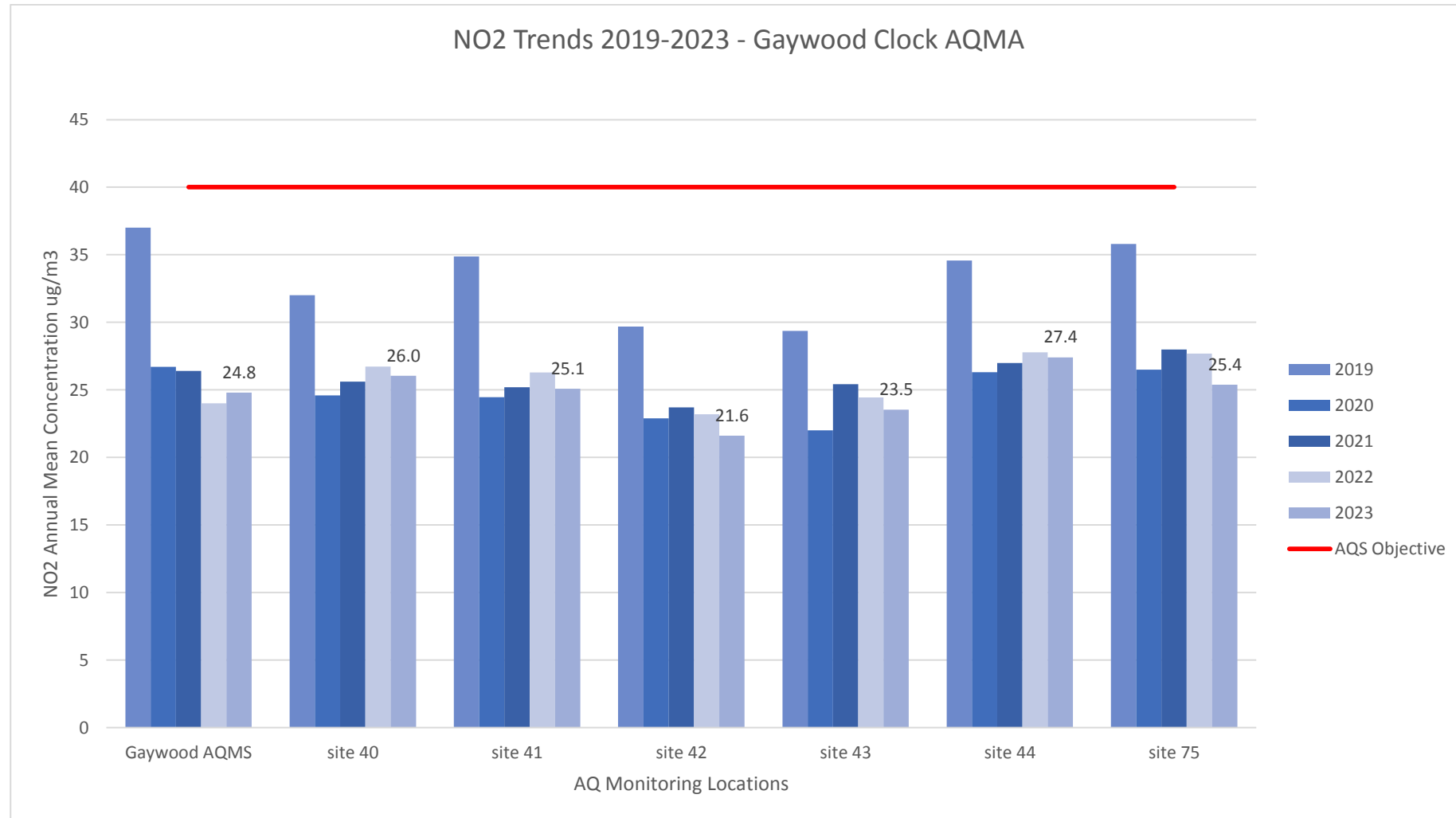


Figure C.8: Trends in NO2 annual mean ( $\mu\text{g}/\text{m}^3$ ) around Gaywood Clock AQMA;



116

## Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the local authority intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
AQS	Air Quality Strategy
ASR	Annual Status Report
BCKLWN	Borough Council of King's Lynn and West Norfolk
BSIP	Bus Service Improvement Plan
Defra	Department for Environment, Food and Rural Affairs
EV	Electric Vehicle charging
EU	European Union
LAQM	Local Air Quality Management
LCWIP	Local Cycling and Walking Infrastructure Plan
NPPF	National Planning Policy Framework
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
PHOF	Public Health Outcomes Framework
SAP	Standard Assessment Procedure

**REPORT TO CABINET**

<b>Open</b>		Would any decisions proposed :			
<b>Any especially affected Wards</b>	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: <a href="mailto:cllr.rust@west-norfolk.gov.uk">cllr.rust@west-norfolk.gov.uk</a>			Other Cabinet Members consulted: None		
			Other Members consulted: None		
Lead Officer: Nikki Patton E-mail: <a href="mailto:Nikki.patton@west-norfolk.gov.uk">Nikki.patton@west-norfolk.gov.uk</a> Direct Dial: 01553616726 Karl Patterson <a href="mailto:Karl.Patterson@west-norfolk.gov.uk">Karl.Patterson@west-norfolk.gov.uk</a> Direct Dial :01553 616847			Other Officers consulted: Duncan Hall Assistant Director of Regeneration, Housing & Place Michelle Drewery Assistant Director Resources & S151 Officer Tina Smith Group Accountant		
Financial Implications Yes	Policy/ Personnel Implications No	Statutory Implications YES	Equal Impact Assessment YES If YES: Pre-screening/	Risk Management Implications Yes	Environmental Considerations Yes

Date of meeting: 17th September 2024

**LOCAL AUTHORITY HOUSING FUND ROUND 3**

**Summary**

This report provides information on the funding offered to BCKLWN in August 2024 through Local Authority Housing Fund (LAHF) Round 3. The programme has been established by the Ministry Housing Communities and Local Government (MHCLG) to support Local Authorities to acquire homes to accommodate households with housing needs who have arrived in the UK Afghan resettlement and relocation schemes and provide temporary accommodation homes for homeless households.

The Council has been offered grant to acquire 8 homes to be used for temporary accommodation for homeless households and 4 properties for Afghan households (Total 12). This is subject to acceptance of terms by the Council through a Memorandum of Understanding. The purpose of the report is to seek approval to accept the grant and inform the Cabinet of the requirements of the grant funding and potential delivery options.

**Recommendation**

It is recommended that:-

1. The Council will enter a Memorandum of Understanding with MHCLG based on the attached prospectus for the Local Authority Housing Fund (see appendix 2). Authority is delegated to the Executive Director (Place) in consultation with the Portfolio Holder for Housing People and Communities to agree the final terms of the Memorandum of Understanding with MHCLG.
2. The Council will accept the total sum of £1,694,876 offered to the



Council by MHCLG under the Local Authority Housing Fund to deliver the programme understanding the match funding requirements as set out in the report and attached prospectus.

3. Cabinet agrees that, subject to agreement from West Norfolk Housing Company, the properties will be acquired by West Norfolk Housing Company, funded by the grant, debt financing and other available funding.
4. Authority is delegated to Assistant Director Resources & S151 Officer in consultation with the portfolio holder for Finance to agree terms with West Norfolk Housing Company for the transfer of properties on the Council's developments including arrangements for deferred consideration if necessary.
5. The Council requests that West Norfolk Housing Company works with the Council to deliver the properties through the fund.
6. Cabinet agrees to the principle of allocating 4 properties acquired through the fund to eligible Afghan households.
7. Authority is delegated to the Executive Director (Place) to alter the proposed Florence Fields tenure mix, originally agreed by Cabinet on the 17<sup>th</sup> January 2023, where necessary, to facilitate the disposal of properties previously identified as Private Rent and/or Open Market Sale, to West Norfolk Housing Company (WNHC) as affordable housing

### **Reason for Decision**

The recommendations will ensure that the opportunity presented by the Local Authority Housing Fund to deliver affordable housing in the borough will be fully realised and will help to relieve pressures on the council's homelessness services.

## **Background**

1.1 MHCLG released details of Round 3 of the Local Authority Housing Fund in August 2024. The funding is primarily designed to support selected local authorities to obtain and refurbish (where necessary) property in order to provide temporary accommodation to any homeless households and sustainable housing for those unable to secure their own accommodation who are here under the Afghan Citizen Resettlement Scheme (ACRS) and the Afghan Relocations and Assistance Policy (ARAP).

1.2 The objectives of Round 3 of LAHF are to:

- Reduce local housing pressures and use of expensive and unsuitable accommodation, by providing better quality temporary accommodation to those owed homelessness duties by local authorities.
- Reduce temporary accommodation costs.

- Provide sustainable settled housing to those on ACRS so that they can build new lives in the UK, find employment, and integrate into communities.
  - Support local housing markets by assisting the delivery of new housing stock or new developments to grow overall housing supply.
- 1.3 Following submission of an Expression of Interest, BCKLWN have been allocated £1,694,876 to provide 12 new build homes - 4 for eligible Afghan households and 8 properties for use as temporary accommodation to meet the Council's wider housing needs. Local authorities accepting the funding are expected to deliver on both elements of the funding.
- 1.4 This fund will complement the existing Afghan resettlement scheme delivered by Norfolk County Council.
- 1.5 Any Afghan households leaving Home Office accommodation without suitable alternative accommodation are likely to approach local authorities for housing assistance. These households will be able to make a homeless application to any local authority, as they are unlikely to have a local connection to any area, they would be owed a duty by whichever local authority they choose to approach. It is possible that some of these households could choose to approach BCKLWN. In these circumstances, they could be housed in accommodation acquired through the LAHF scheme.
- 1.6 The main principle behind the funding is to alleviate pressures on existing homelessness systems.
- 1.7 In 2022 all local authorities received a letter from the Home Office, asking all local authorities in England to support the resettlement efforts of asylum seekers including Afghans to ensure that the responsibility does not fall disproportionately on a small number of local authorities.
- 1.8 The final target date for delivery of homes is 31st March 2026 with the delivery of 2 homes expected by 31<sup>st</sup> March 2025. There is an expectation that contracts to acquire homes will be exchanged by these dates. The Council has the opportunity to use the funding to provide homes via its own developments, which includes the Florence Fields development currently under construction. This includes properties earmarked to be sold on the open market. Rather than this, some of these homes could be acquired at open market value and provided as affordable housing through the fund. This option mitigates the risk of not meeting the delivery timescales of the fund i.e. 31<sup>st</sup> March 2026.
- 1.9 The homes will be of a type and price to ensure they can be delivered as affordable housing. In order to meet the housing needs of those eligible, the homes should be within the borough's towns. The funding allocation is based on the expectation that 3 of the 8 units for



temporary accommodation will be 1 bedroom properties. This will respond to the Council's current temporary accommodation needs. The 4 resettlement properties for Afghan families are required to be 4-bedroom properties. However, officers are exploring with MHCLG whether large 3 bed properties could be delivered used to fulfil this requirement.

- 1.10 The aspirations of the Fund in relation to future longer-term use of the homes is for them to become part of the wider affordable housing stock. The type and locations therefore need to be suitable to meet the wider housing needs of the borough. Consideration also needs to be given to the ongoing maintenance costs and energy efficiency of properties.
- 1.11 The approach will be to assess the suitability of properties available on the open market at Florence Fields development taking into account the above factors. If sufficient open market properties cannot be identified, consideration will be given to properties at Florence Field currently earmarked for the private rented sector. This approach will add an additional 12 properties to the affordable housing stock.
- 1.12 In order to accept the funding, the Council is required to sign a Memorandum of Understanding (MOU). MHCLG has indicated that the Memorandum of Understanding had to be signed by 16<sup>th</sup> September 2024. However, it has now been confirmed that the full allocation will be made available if the MOU is agreed shortly after the 16<sup>th</sup> September. The 1<sup>st</sup> tranche of funding (30% of the year 1 allocation) will be released shortly after entering into the MOU with the remaining allocation paid in 3 further tranches as properties are secured.
- 1.13 The Council has previously accepted funding from Central Government to deliver 29 affordable homes through rounds 1 and 2 of the Local Authority Housing Fund. Further background on the fund can be found within the cabinet reports from 8<sup>th</sup> February 2023 and 1<sup>st</sup> August 2023 and an update on delivery of these homes is contained in section 3 of this report.

## **2. Tenure**

- 2.1 The homes delivered through this fund will be affordable/low-cost housing to support wider local authority housing and homelessness responsibilities for the remainder of their lifetime.
- 2.2 Tenancies for resettlement properties will be assured (lifetime) tenancies or fixed term tenancies. Temporary Accommodation properties will be let on licences.

- 2.3 Although 4 out of the 12 properties will have to be used for the defined cohort, in the long run they could be used by the wider community. The funding will increase the stock of affordable housing in the borough and assist with meeting housing pressures.

### **3. LAHF Rounds 1 and 2 Update**

- 3.1 The Council has previously accepted funding to deliver a total of 29 affordable homes through rounds 1 and 2 of the Local Authority Housing Fund. These homes intended to meet the needs of Ukrainian households fleeing conflict (14 homes), Afghan households on resettlement schemes (8 homes) and temporary accommodation (7 properties).
- 3.2 All 29 homes have been identified. As of 22<sup>nd</sup> August, 11 properties have been occupied, 8 properties are undergoing works following acquisition and terms have been agreed on the remaining 10 properties.
- 3.3 As part of the scheme, 8 Ukrainian Households at risk of homelessness have been housed although it is likely that these would have been housed through the housing register in any case.
- 3.4 Despite working closely with Norfolk County Council's Persons From Abroad Team, no Afghan families have been housed. This is due to a lack of nominations from the Home Office. MHCLG has agreed with the Council that homes acquired for Afghan Households can be used for general needs if no nominations are received on the basis that properties from the general needs stock will be provided if required. Therefore 3 properties acquired for eligible Afghan households have now been used for general needs.

### **4. Options Considered**

- 4.1 There are 3 options
- Option 1 - Accept the funding and deliver the properties in partnership with the Council's wholly owned Registered Provider, West Norfolk Housing Company
  - Option 2 - Accept the funding and seek to work with an alternative Registered Provider
  - Option 3 - Turn down the funding
- 4.2 **Option 1** - The Council can choose to accept the grant from MHCLG and work with West Norfolk Housing to provide the 12 affordable homes under the terms set out above or reject the grant. Subject to the agreement of West Norfolk Housing Company, homes could be acquired using grant funding from this fund along with debt financing

and any other appropriate funding streams. This aligns with West Norfolk Housing Company's emerging Business Plan.

- 4.3 Whilst the timescales required are challenging, the potential to work with West Norfolk Housing Company to acquire homes from the Council's developments provides a high level of certainty and control and gives confidence that the timescales can be met along with greater control over the future use of the units.
- 4.4 West Norfolk Housing have a track record of providing temporary accommodation and are committed to assisting the Council to meet its priorities in relation to homelessness and the provision of suitable temporary accommodation.
- 4.5 **Option 2** - Whilst there are a small number of Registered Providers operating in the borough which could potentially deliver the properties, the timescales and type of accommodation to be delivered under the fund are challenging. Additionally, this option would not provide the same level of certainty and control as working with West Norfolk Housing.
- 4.6 **Option 3** - If the Council chose to reject the funding due to the required terms including the timescales, it could endeavour to provide additional accommodation without this funding to respond to the increased housing pressures that are being experienced. This would have greater capital funding implications for the Council and reduce deliverability.
- 4.7 Option 1 is recommended as it provides the greatest certainty and control over delivery and being able to comply with the terms of the grant funding. It also secures above average levels of central government grant funding to increase the provision of affordable housing in the borough and help relieve homelessness pressures. This supports key objectives in the Council's existing Homelessness and Rough Sleeping Strategy 2019-2024 and the emerging strategy 2024-2029 ie increasing supply of affordable accommodation and reducing the use of Bed and Breakfast accommodation for homeless households.

## 5. Policy Implications

- 5.1 Due to the eligibility criteria for the fund, 4 of the homes must be allocated to eligible homeless Afghan households. On 27<sup>th</sup> June 2023 Cabinet endorsed a Local Lettings Plan to be used to allocate homes acquired through LAHF Round 1, including 2 homes for Afghan families.
- 5.2 It is proposed to extend this lettings plan to cover the 4 homes for Afghans funded through LAHF Round 3. In accordance with the

Council's Social Housing Allocations Policy, this will need to be approved by the West Norfolk Homechoice panel. The remaining 8 temporary accommodation properties will be used to accommodate homelessness households in accordance with Homelessness legislation.

## **6. Financial Implications**

- 6.1 It is estimated that the total cost of acquiring the 12 homes on the Florence Fields development will be £2.9 to £3.1m. Based on this, match funding of £1.2 to £1.4m will be required. Unlike previous rounds of the fund, there are no limits on the percentage of costs which can be covered by the grant.
- 6.2 The Affordable Housing Value of the 12 homes is estimated to be around £1.3 to 1.43m indicating that the scheme will provide good value for money as the affordable housing value is broadly in line with the match funding required.
- 6.3 Match funding could come from various sources including the following;
- Borrowing by West Norfolk Housing Company covered by the rental income from the properties.
  - Other available sources of capital funding
  - Other funding sources related to Afghan resettlement.
- 6.4 West Norfolk Housing are in the process of agreeing financing arrangements with the Council which would enable to company to pay the market value of the properties using. If these arrangements are not in place prior to the delivery of the properties to be identified, the Council will consider deferring an element of the market value on the basis that the net rent received by the company is transferred to the council until full payment is made. Whilst this would result in a delay to the council receiving capital receipts for the properties, it is anticipated that the rental income would cover the Council's borrowing costs.
- 6.5 The 8 properties acquired for temporary accommodation will be used by the Council to help meet statutory homelessness duties. This will help reduce the council's need for inappropriate Bed and Breakfast accommodation. An additional 8 units of temporary accommodation for families would provide more appropriate accommodation for homeless families and could save the council up to £105,000 per year in bed and breakfast costs. This supports one of the key objectives of the Council's emerging Homelessness and Rough Sleeping Strategy 2024-2029 (to reduce use of bed and breakfast accommodation).
- 6.6 The recommended option (Option 1) will not have a negative financial impact on the council's capital programme. As the units will either be

purchased by West Norfolk Housing Company at open market values or in the event that West Norfolk Housing Company finance arrangements are not in place as set out in paragraph 6.4, the net rent received will cover the Councils borrowing costs until full payment is made.

- 6.7 There are no additional revenue expenditure implications for the Council.

## **7. Personnel Implications**

None

## **8. Environmental Considerations**

- 8.1 Due to forthcoming regulations relating to energy efficiency, it is essential that homes acquired have EPC rating of C or above.

## **9. Statutory Considerations**

- 9.1 The fund will provide accommodation which will assist the Council to meet its statutory homelessness duties.

## **10. Equality Impact Assessment (EIA)**

- 10.1 Pre-screening report attached. Full EIA to follow.

## **11. Risk Management Implications**

- 11.1 The potential risks and implications associated with the grant are discussed below:

- 11.1.1 The target date for completion is challenging and failure to deliver homes may lead to funding being clawed back. This can be mitigated by delivered homes through the councils' development.

The following are associated risks of not taking the funding

- 11.1.2 Risk of losing opportunity to add to affordable housing stock

- 11.1.3 Risk of not meeting the housing needs of the funds eligible households and fulfilling statutory functions.

- 11.1.4 Risk of not meeting wider housing and homelessness pressures

- 11.1.5 These would risk the increasing use of inappropriate and expensive temporary accommodation in particular bed and breakfast.

- 11.2 These associated risks both risk the increasing use of inappropriate and expensive temporary accommodation in particular bed and breakfast.

## **12. Declarations of Interest / Dispensations Granted**

Duncan Hall - Director of West Norfolk Housing Company

## **13. Background Papers**

Prospectus for Local Authority Housing Fund Round 3

[Local Authority Housing Fund: Round 3 prospectus and guidance - GOV.UK](https://www.gov.uk)  
([www.gov.uk](https://www.gov.uk))

**Appendix 1 - Pre-Screening Equality  
Impact Assessment**

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



Name of policy/service/function	Delivery of Affordable homes through Round 3 of the Local Authority Housing Fund				
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 12 homes using grant allocation from Local Authority Housing Fund Round 3 to provide 8 properties for use as temporary accommodation and 4 properties for eligible Afghan households in line with eligibility criteria set by fund. The homes will help the council respond to increased homelessness pressures and will be used to meet the wider housing needs of the borough in the longer-term. Delivery of homes must be in accordance with the prospectus for the fund.				
<b>Question</b>	<b>Answer</b>				
<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 <b>according to their different protected characteristic</b>, 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			Y	
	Disability			Y	
	Gender			Y	
	Gender Re-assignment			Y	
	Marriage/civil partnership			Y	
	Pregnancy & maternity			Y	
	Race	Y			
	Religion or belief			Y	
	Sexual orientation			Y	
Other (eg low income)	Y				



Question	Answer	Comments
<p><b>2.</b> 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>	Yes	The delivery of 4 homes through the fund for eligible Afghan households could be seen as favoring these households over established local communities.
<p><b>3.</b> Could this policy/service be perceived as impacting on communities differently?</p>	Yes	Perception that this could negatively impact on established communities although not the case as homes would be delivered as affordable housing without the funding
<p><b>4.</b> 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.</p> <p>Aims to tackle disadvantage faced by Afghan households that have arrived in UK via resettlement schemes. Households may be at disadvantage when accessing housing due to difficulties in obtaining references and guarantors</p>
<p><b>5.</b> 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><b>Actions:</b> N/A</p> <hr/> <p><b>Actions agreed by EWG member:</b></p> <p>.....</p>
<p><b>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:</b></p> <p>A full impact assessment will be undertaken in advance of the report being considered by Cabinet in September 2024.</p> <p><b>Decision agreed by EWG member: Charlotte Marriott.....</b></p>		
<p><b>Assessment completed by:</b></p> <p><b>Name</b></p>	Karl Patterson	
<p><b>Job title</b></p>	Housing Development Manager	
<p><b>Date</b></p>	22 <sup>nd</sup> August 2024	



# Equality Impact Assessments

## Full Impact Assessment Form

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

Service Area – Strategic Housing  
Assistant Director – Duncan Hall  
Lead Officer – Nikki Patton & Karl Patterson

### 2. What change are you proposing?

The acceptance of capital grant funding offered to BCKLWN through the Local Authority Housing Fund Round 3 for the acquisition of 12 new affordable homes. Four of these homes would be to provide longer-term sustainable accommodation for households from Afghanistan who have arrived or are soon to arrive in the UK via resettlement schemes and are now at risk of homelessness or are currently housed in unsuitable accommodation. The remaining 8 will be provided as temporary accommodation for homelessness households.

The 4 homes will assist the council to respond to increased pressures from these arrivals on the existing housing and homelessness systems, particularly as accommodation arrangements provided by the Home Office come to an end. The homes will also add to the borough's affordable housing stock and will be used to meet wider housing needs in the longer term.

It is envisaged that the homes will be acquired by the council's wholly owned Registered Provider of Social Housing, West Norfolk Housing Company Ltd.

The decision regarding acceptance of the funding will be made by Cabinet on 17<sup>th</sup> September and a Memorandum of Understanding with MHCLG must be signed in September 2024.

On 27<sup>th</sup> June 2023 Cabinet endorsed a Local Lettings Plan to be used to allocate homes acquired through LAHF Round 1, including 2 homes for Afghan families.

It is proposed to extend this letting plan to cover the 4 homes for Afghans funded through LAHF Round 3. In accordance with the Council's Social Housing Allocations Policy, this will need to be approved by the West Norfolk Homechoice panel. The remaining 8 temporary accommodation properties will be used to accommodate homelessness households in accordance with Homelessness legislation.

**3. How will this change help the council achieve its corporate business plan objectives (and therefore your Directorate/service objectives)?**

The funding will enable new affordable housing to be delivered which will help to achieve the following Corporate Business Plan Objectives.

**Promote growth and prosperity to benefit West Norfolk. To create job opportunities, support economic growth, develop skills needed locally, encourage housing development and infrastructure that meets local need and promote West Norfolk as a destination,**

- The homes will be new build affordable housing therefore increasing affordable housing stock in the borough .

**Support our communities- To 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.**

- The homes will enable those from Afghanistan arriving in the UK having fled war torn countries to access longer-term sustainable and appropriate accommodation.
- The homes will provide good quality temporary accommodation for any households facing homelessness and therefore reducing the Borough Council's use of inappropriate and expensive B&B as temporary accommodation. This is a key objective of the Council emerging Homelessness & Rough Sleeping Strategy 2024-2029 and existing Homelessness & Rough Sleeping Strategy 2029 (I think this date is wrong?)-2024

#### 4. What is your evidence of need for change?

- Funding has been allocated by MHCLG to local authorities and supports the Government's commitment to supporting those who have fled conflict and the need to ensure the effective resettlement and integration of refugees into local communities. The funding available is specifically to address this need – which has been identified nationally. The funding has also been made available to reduce local housing pressures and use of expensive and unsuitable accommodation, by providing better quality temporary accommodation to those owed homelessness duties by local authorities and increase and support local housing markets by assisting the delivery of new housing stock or new developments to grow overall housing supply.
- The acceptance of the funding is discretionary but comes with specific terms including the use of the homes to accommodate 4 eligible households from Afghanistan. The new homes will respond to increasing pressures on the council's Housing Services
- Many of these households will face barriers to entering the private rental sector due to requirements for references, credit checks and guarantors that they may be unable to provide due to their recent arrival in the UK. Therefore, a proportion are likely to require housing assistance from the Council. This modest number of additional affordable homes will help to accommodate those in the highest need. Without the new affordable homes, the housing needs of these households would have to be met in other ways. This is likely to be through the existing affordable housing stock. This would increase pressures on the existing stock and disadvantage existing communities.

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

- The properties will enable sustainable accommodation to be offered to households at risk of homelessness or currently in unsuitable accommodation. These needs would otherwise have to be met by the existing housing stock. Pressures on the existing housing stock may mean that without these homes, households would have to be placed in inappropriate and expensive temporary accommodation such as bed and breakfast.
- The homes will add to the long-term stock of affordable housing in the borough
- The options under consideration will not have a negative financial impact on the council's capital programme.

**6. What geographical area does this proposal cover?**

- Homes are expected to be acquired within King's Lynn in order to provide access to services such as schools, GPs, transport links etc
- There is an expectation that the homes will be acquired on the Florence Fields Development, a Borough Council development currently under construction but this will depend on property availability and price
- There are no cross-boundary implications

## 7. What is the impact of your proposal?

- An additional 12 affordable homes will be acquired
- 12 households at risk of homelessness or housed in unsuitable accommodation, who will require housing assistance from the council, will be housed in either long term accommodation or good quality temporary accommodation
- Wider housing needs will be met by the homes in the longer term

In considering our proposals we have been mindful of our legal responsibilities, as set out in the Equality Act 2010, which seeks to protect the rights of individuals and advance equality of opportunity for all. This particular funding is targeted at specific potentially disadvantaged groups in our local community, and it has therefore been necessary to consider how we fulfil our role with regards equalities, as a community leader and as service provider in west Norfolk.

The Equality Act places a requirement on all Local Authorities to comply with the Public Sector Equality Duty (PSED) in the exercise of their functions, to have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

Having 'due regard' means giving consideration to:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

There is a risk that this proposal could impact on the relationships between residents who share a protected characteristic and those who do not. However, the proposals have due regard to minimising disadvantage and taking steps to meet the needs of people from protected groups due to the specific circumstances of those who will benefit from them. The risk is greater if the specific purpose and limitations of the funding are not clearly explained and communicated. Therefore, steps to mitigate potential negative impacts are critical.

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

We are aware that nationally there are Afghan households residing in Home Office Accommodation and require longer term sustainable housing. None of these are currently in the borough.

There are currently 68 households in total in temporary accommodation, 35 of which are in B&B accommodation. A key objective of the emerging homelessness & Rough Sleeping Strategy is to have no need for B&B accommodation.

**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?**

Persons from Abroad team at Norfolk County Council will be consulted in relation to the type and location of the 4 homes to be acquired for Afghan households.

Ward members will be notified if homes are acquired in their areas via member briefings.

Wider services such as Police and other statutory services will be made aware of the scheme at a strategic level via the Persons From Abroad Strategic Meetings



## 10. Are there any implications for other service areas?

Implications of the scheme on other services will be minimal except for the following teams

- New homes will help to relieve pressures on the Housing Needs service area.
- Allocation of homes to Afghan households may increase perception that Allocations Policy is unfair. This may impact on the Housing Needs team and CIC in terms of enquiries.
- Communications team are aware of the scheme and will be kept up to date with any developments to enable proactive communications
- Property Services may assist with the acquisition of homes for the scheme
- The properties are likely to be acquired via the Council's own developments which would have implications for the Corporate Projects team

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

It should be noted that the Council will have the responsibility for addressing these housing needs with or without the additional funding. Accessing the additional funding therefore enables existing funding to address other housing pressures within the wider community

- Positive impact based on Race/Nationality – The 4 new homes will increase access to sustainable housing for eligible Afghan households at risk of homelessness. The remaining 8 homes will increase access to sustainable for housing for any eligible household requiring temporary accommodation regardless of race or nationality.
- The Afghan households are disadvantaged by barriers to accessing private rented accommodation due to requirements for references, credit checks and guarantors that they may be unable to provide due to their recent arrival in the UK.
- If there are perceptions that Afghan households are gaining favourable treatment ahead of existing communities are allowed to develop, this may lead to increased community tensions. It is possible that this could result in hate crimes against Afghan households.
- The allocation of the new homes to eligible households from Afghanistan is a requirement of the grant funding which will be used to acquire the homes.
- Without the new affordable homes, the housing needs of these households would have to be met in other ways. This is likely to be through the existing affordable housing stock. This would increase pressures on the existing stock and disadvantage existing communities.
- Longer term, the additional housing will become available to support the wider community, increasing the stock of affordable housing in the borough, supporting local families on low income.
- This policy will not impact significantly on the general local housing market
- The policy will not negatively impact on local services as the numbers are small ie 4 households and will be supported by the Persons From Abroad Team to support community integration.

**12. What actions could be taken to mitigate the adverse impacts identified in question 11? Please clearly state if any actions cannot be mitigated.**

Effective communications regarding the scheme to highlight benefits to the wider population of additional affordable housing stock and dispel perceptions of negative effect on existing communities could help to minimise any increase in community tensions.

The Communications team will play a key role and does this by supporting the dissemination of positive stories about how new communities are settling in. For example, how they are supporting themselves, getting jobs, contributing to society. Continuing to highlight the plight that these communities may face in the countries from which they have come can help to foster a sense of community spirit and duty towards new communities. In the case of the LAHF, the communications team is not seeking to publicise the scheme, only to be prepared to answer questions about it as they arise

The Communications team will also monitor social media to gather intelligence on public perceptions

**13. How will you monitor the impact of this change?**

The Strategic Housing Team will complete monitoring returns bimonthly for MHCLG. These can also be used to monitor the impact internally; this is likely to include

- Offers accepted, including bedroom size and whether these are part of the Afghan element or temporary accommodation element.
- Number of properties where contracts exchanged, including bedroom size; •
- Number of properties occupied, including bedroom size; •
- Number of families housed, including which resettlement programme they belong to; •
- Number of individuals housed, including which resettlement programme they belong to.
- Total expenditure (including grant and other funding).
- Total committed spend (including grant and other funding); #
- Government grant used

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

Consultation with and input from the Equalities Working Group have been incorporated into the assessment.

**Assessment Completed By: Nikki Patton**

**Job Title: Housing Services Manager**

**Date: 27<sup>th</sup> August 2024**

Comments:

Supporting this application for Local Authority Housing Fund Round 3 will enable the Borough Council to deliver quality affordable housing for those Afghan households displaced from their homes without impacting on the existing housing offer to those already on the homelessness list. It also adds provision for all those who are not from Afghanistan and contributes towards the reduction in reliance on Bed and Breakfast accommodation. The overall impact will be positive for all members of our communities.

L Gayton

Document is Restricted

Document is Restricted