

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



# **Environment and Community Panel**

## **Agenda**

**Tuesday, 3rd September, 2024**  
at 4.30 pm

in the

**Council Chamber, Town Hall 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**

Friday 23<sup>rd</sup> August 2024

Dear Member

**Environment and Community Panel**

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Tuesday, 3rd September, 2024 at 4.30 pm** in the **Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ** to discuss the business shown below.

Yours sincerely

Chief Executive

**AGENDA**

**1. Apologies for absence**

To receive any apologies for absence.

**2. Minutes (Pages 4 - 9)**

To approve the minutes of the previous meeting.

**3. Declarations of interest (Page 10)**

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.

Those 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.

4. **Urgent Business**

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

5. **Members Present Pursuant to Standing Order 34**

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

6. **Chair's Correspondence**

If any.

7. **Wash East Coast Management Strategy- Unit C- Technical Report** (Pages 11 - 25)

8. **Air Quality Action Plan** (Pages 26 - 94)

9. **Food Waste Collection- Maximising Collection** (Pages 95 - 102)

10. **LAHF Round 3** (Pages 103 - 115)

11. **Work Programme and Forward Decision List** (Pages 116 - 123)

12. **Date of the next meeting**

To note that the next meeting of the Environment and Community Panel is scheduled to take place on **8<sup>th</sup> October 2024** at **4:30pm** in the **Council Chamber, Town Hall, Saturday Market Place.**

To:

**Environment and Community Panel:** T Barclay, P Bland, A Bullen, S Collop (Chair), R Colwell, P Devulapalli (Vice-Chair), D Heneghan, P Hodson, A Kemp, J Kirk, P Kunes and S Sandell

**Portfolio Holders:**

Councillor Squire- Cabinet Member for Environment and Coastal- Agenda item 7 and Agenda item 9.

Councillor de Whalley- Cabinet Member for Biodiversity and Climate Change- Agenda item 8.

Councillor Rust- Cabinet Member for People and Communities- Agenda item 10.

**Officers:**

Martin Chisholm- Assistant Director, Operations and Commercial  
Nikki Patton- Housing Services Manager  
Barry Brandford- Waste and Recycling Manager  
Dave Robson- Environmental Health Manager

**By Invitation:**

Representatives from Environment Agency



**BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK**

**ENVIRONMENT AND COMMUNITY PANEL**

**Minutes from the Meeting of the Environment and Community Panel held on  
Tuesday, 16th July, 2024 at 4.30 pm in the Council Chamber, Town Hall,  
Saturday Market Place, King's Lynn**

**PRESENT:** A Bullen (Chair)  
Councillors T Barclay, P Bland, D Heneghan, A Kemp and P Kunes

**Portfolio Holders**

Councillor M de Whalley, Gayton and Grimston Ward  
Councillor S Ring, The Woottons Ward  
Councillor J Rust, Springwood Ward

**Officers:**

Paul Billington, Interim Assistant Director - Alive West Norfolk  
Honor Howell, Assistant to the Chief Executive  
Nikki Patton, Housing Strategy Officer  
Andy King, Senior Housing Manager  
Richard Cooper, Housing Data Analysis  
Martin Chisholm, Assistant Director Operations and Commercial

**EC13: APPOINTMENT OF CHAIR FOR THE MEETING**

[Click here to view the recording of this item on You Tube](#)

**RESOLVED:** In the absence of the Chair, Councillor Bullen was nominated as the Chair for this Environment and Community Panel Meeting.

**EC14: APOLOGIES FOR ABSENCE**

[Click here to view the recording of this item on YouTube.](#)

Apologies for absence were received from Councillor Collop, Devulapalli and Sandell.

**EC15: MINUTES**

[Click here to view the recording of this item on YouTube.](#)

**RESOLVED:** The Minutes from the meeting held on the 9<sup>th</sup> April 2024 and 4<sup>th</sup> June 2024 were agreed as a correct record and signed by the Chair of the meeting.

EC16: **DECLARATIONS OF INTEREST**

There were no declarations of interest.

EC17: **URGENT BUSINESS**

There was none.

EC18: **MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

There was none.

EC19: **CHAIR'S CORRESPONDENCE**

There was none.

EC20: **CABINET REPORT- HOMELESSNESS AND ROUGH SLEEPING STRATEGY**

[Click here to view the recording of this item on YouTube.](#)

The Housing Services Manager introduced the Strategy to the Panel and advised that all Local Authorities were required by law to produce a Homelessness and Rough Sleeping Strategy every five years.

The Senior Housing Manager gave a presentation to the Panel on the Homelessness and Rough Sleeping Strategy, a copy is attached.

The Senior Housing Manager advised the timeline of the strategy which included a review which was conducted in the autumn and winter of 2023/24 and published in April 2024. He added as part of the timeline, the draft strategy was completed in July 2024 and therefore was on track. The Senior Housing Manager explained to the Panel sessions had been held to encourage input from Council employees, Local Partners, Public Survey and people with lived experience of homelessness, with a total of 118 individuals contributing.

The Senior Housing Manager highlighted to the Panel the Key Strategy Aims were prevention, intervention, accommodation, recovery, and system support/service culture. He highlighted the values and behaviours included in the strategy which were dignity, transparency, flexibility, collaboration, and empowerment.

The Chair, Councillor Bullen thanked the Senior Housing Manager for the presentation and the detail of the Strategy produced along with all the work involved.

Portfolio Holder, Councillor Rust thanked all the Housing Team for their hard work and by ending homelessness person by person and putting them at the heart of the strategy.

Councillor Kemp commented that the report was ambitious and included detail in depth. Councillor Kemp asked if the Strategy included more help for people renting in the private sector along with if there were any plans for help with mortgages and if the Borough Council would be a guarantor for rent. She further asked if the Strategy included improved access to mainstream health services.

The Senior Housing Manager responded to Councillor Kemp's questions. He advised the Strategy focused on improved partnerships with the private sector. He commented guaranteed rents could be considered with an effective scheme. The Senior Housing Manager stated regarding mortgages, this was not a trend currently but if this became a further issue then it would be investigated further. He commented further regarding the working relationships with the private sector which included Citizen Advice Bureau and Inclusion Health.

Portfolio Holder, Councillor Rust added Shelters and Citizen Advice Bureau were already existing services which helped with managing tight budgets and the Borough Council provided the 'Beat the Bills' scheme.

Councillor Kunes asked if the Council provide accommodation for customers where the properties do not have restrictions, for example pets or smoking allowed.

The Senior Housing Manager clarified Housing First provided a service for people who were unable to progress in a hostel environment or settings where there were extensive restrictions. He added Housing First worked with support accommodation providers to provide accommodation to ensure there was no negative impact.

Councillor Kemp sought clarification if Care Leavers had been identified in the Strategy.

The Housing Services Manager provided assurance that there was already policies and frameworks in place in relation to Care Leavers and needs have been identified however policy allocation was being reviewed.

Portfolio Holder, Councillor Rust referred members to the Care Leavers Covenant which highlighted what the Council would be doing for Care Leavers, and this overlapped existing policies.

The Chair, Councillor Bullen commented that it needed to be recognised that the Borough Council were addressing the issues with Homelessness and Rough Sleeping and working hard to end homelessness one by one.

The Senior Housing Manager elaborated further that ending homelessness was the overall goal on the horizon and the strategy works towards that.

**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.

EC21: **CABINET REPORT- ALIVE WEST NORFOLK ARRANGEMENTS**

[Click here to view the recording of this item on YouTube.](#)

The Corporate Governance Manager/ Assistant to the Chief Executive presented the report on Alive West Norfolk Arrangements.

The Corporate Governance Manager/ Assistant to the Chief Executive outlined the aspirations of Alive West Norfolk and that the post five year start up remained challenging. The report concluded that Alive West Norfolk required subsidy from the Borough Council. She highlighted the need and requirement to invest in improvement of facilities in Lynnsport, St James pool or Oasis pool however there was no capital.

She outlined the recommendations to Cabinet in the report and explained the governance and operations of Alive West Norfolk were recommended to be returned to in-house management with the management and structure to be determined following the appointment of the new Chief Executive. She confirmed to the Panel the options which had been considered as part of the review.

The Corporate Governance Manager/ Assistant to the Chief Executive explained the complexity to administer Alive West Norfolk and the static levels of activity and visit levels. She explained the key elements to the Panel such as all of the Alive West Norfolk Staff being on the Borough Council terms and conditions already therefore further costs would not be incurred.

The Chair thanked the Corporate Governance Manager/ Assistant to the Chief Executive for the report and invited questions and comments from the Panel.

Councillor Kemp endorsed the recommendations and agreed Alive West Norfolk would be more profitable in-house. She asked what consultation would be taken and what action would be taken to include and encourage people without surplus income.

The Interim Assistant Director Leisure, Arts and Lynnsport clarified consultation had been taken with users and non-users and encouraging young people to exercise. He confirmed he was still awaiting the results from the survey. He added in regard to value for money there has been continuous financial pressures in recent years and this had led to price rises for the customer at the same time as the quality of the facilities had gone down. This resulted in perceptions of reduced value for money amongst users. If facilities were improved this would increase income and give the council more flexibility on pricing policies.

Councillor Heneghan confirmed that due to the number of gyms in the area, she looked forward to seeing the result of the survey and hoped work was done to prioritise what it was that users wanted. She endorsed Alive West Norfolk to come back in-house.

Portfolio Holder, Councillor Ring commented that the detail of the report demonstrated the need for Alive West Norfolk to be brought back in-house. He highlighted to the Panel these facilities do not go well in a business together. He highlighted in the next four to five years what the Council could deliver and return in profit. He made further comment that the Council was fortunate to own these facilities and added that the Council could provide an efficient service with bringing Alive West Norfolk in house and to deliver and identify Health and Wellbeing opportunities.

The Chair, Councillor Bullen referred to the report and asked about the 10% activity being down since Covid and what the contributions were.

The Corporate Governance Manager/Assistant to the Chief Executive advised there were a number of factors including people being reluctant to return to areas that could be high risk areas and also lack of disposable income due to increase in energy bills. She added there were a variety of causes and difficult to specify.

**RESOLVED:** The Environment and Community Panel supports the report and recommendations to Cabinet.

EC22: **WORK PROGRAMME AND FORWARD DECISION LIST**

[Click here to view the recording of this item on YouTube.](#)

Members of the Panel were reminded that an eform was available on the Intranet which could be completed and submitted if Members had items which they would like to be considered for addition to the Work Programme.

Councillor Kunes asked for the CO2 Audit to be added and enquired further about the Climate Change Informal Working Group.

**RESOLVED:** The Panel's Work Programme was noted.

EC23: **DATE OF THE NEXT MEETING**

The next meeting of the Environment and Community Panel would be held on

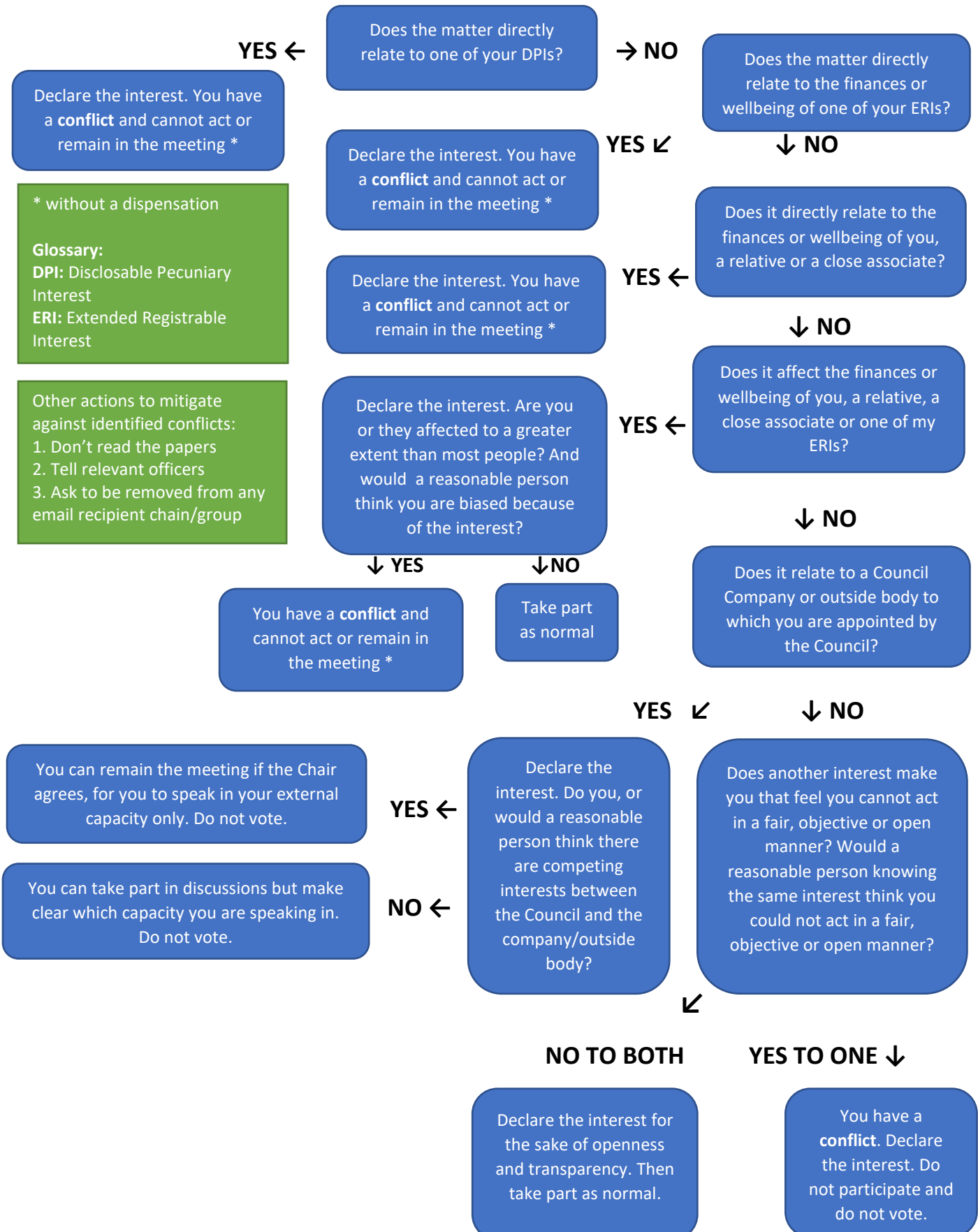
**3rd September 2024 at 4:30pm in the Council Chamber, Town Hall.**

**The meeting closed at 5.52 pm**

# 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

# Environment and Community Panel

12

3<sup>rd</sup> September 2024



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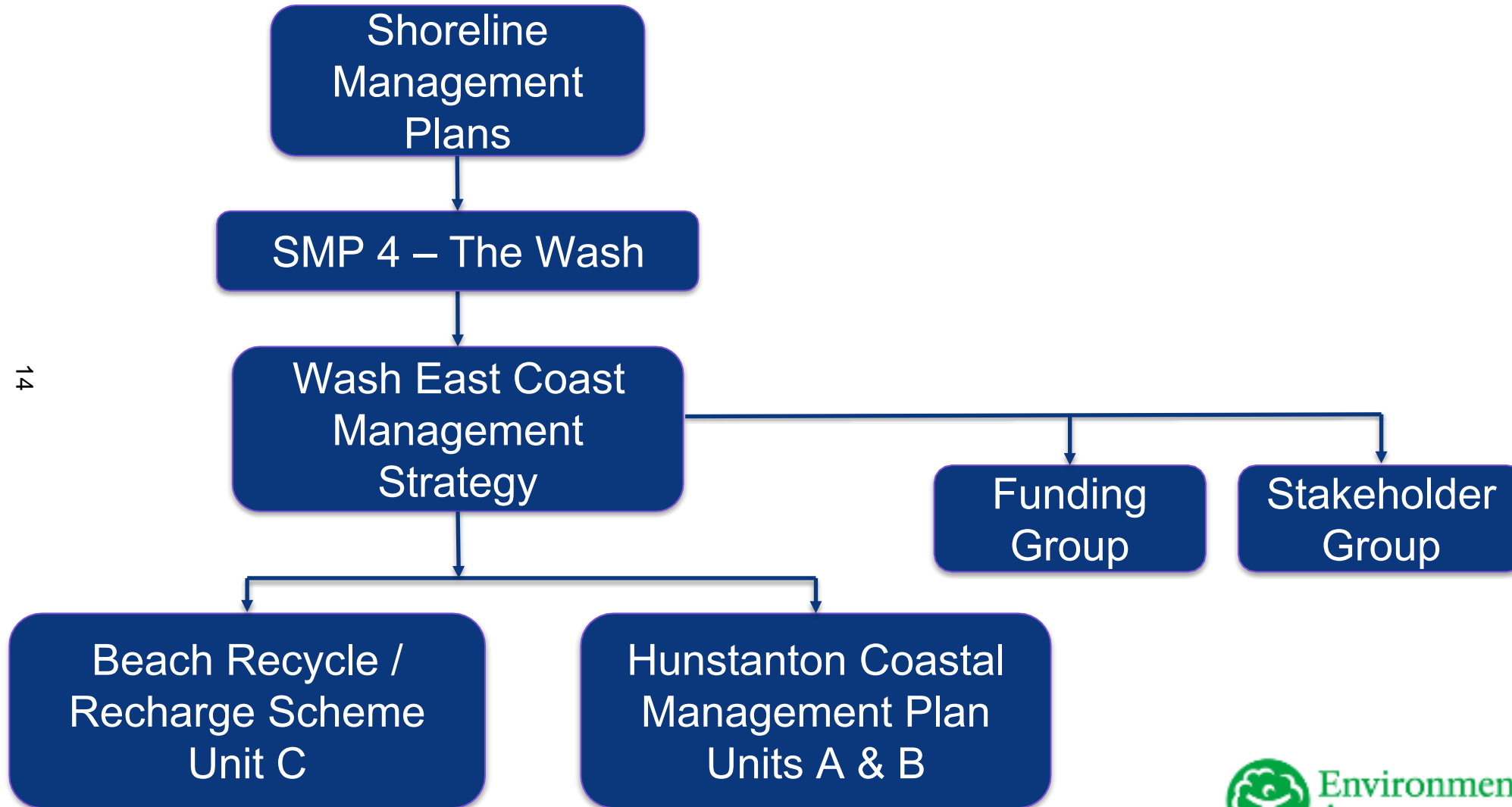




# 6. South Hunstanton to Wolferton Creek (Unit C) Update

Phil Hulme and George Fuhrmann

# Policy Hierarchy





Unit A


Unit B

Unit C

Unit A = Hunstanton Cliffs  
Unit B = Hunstanton Town  
Unit C = South Hunstanton to Wolferton Creek




**Defences (EA maintained)**

 Embankment

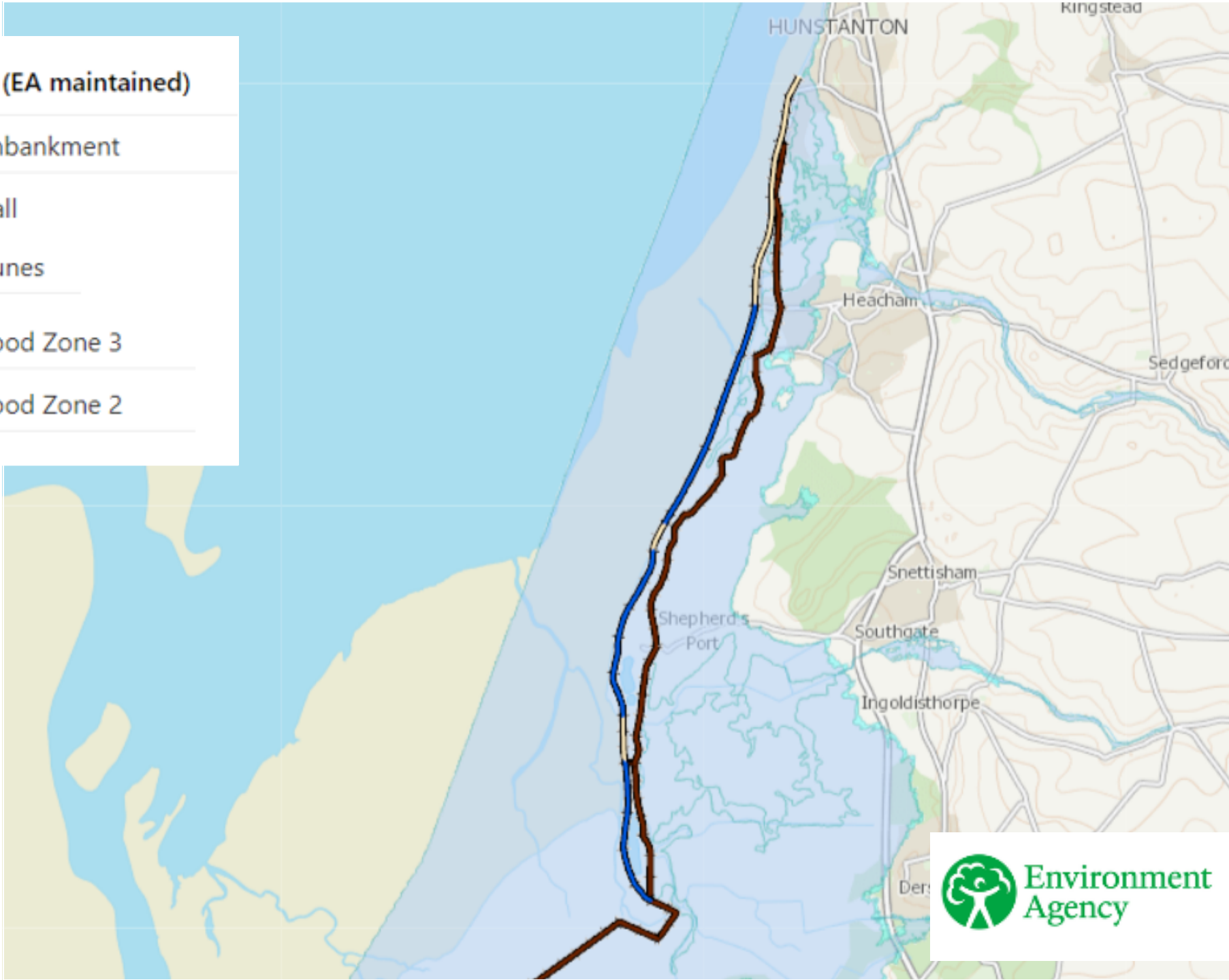
 Wall

 Dunes

 Flood Zone 3

 Flood Zone 2

16



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# SMP 4 Polices & Timeline

HLT = Hold the Line  
 NAI = No Active Intervention  
 MR = Managed Realignment

Unit Area	Up to 2025	2025 to 2050	2050 to 2100
A – Cliffs	NAI	NAI	HTL
B – Hunstanton	HTL	HTL	HTL
C – South Hunstanton to Wolferton Creek	HTL	HTL/MR/NAI	HTL/MR/NAI

17

# Current Management Approach

18



Annual Beach Recycling



Intermittent Beach Recharge

(1992 & 2005)



Ongoing beach monitoring

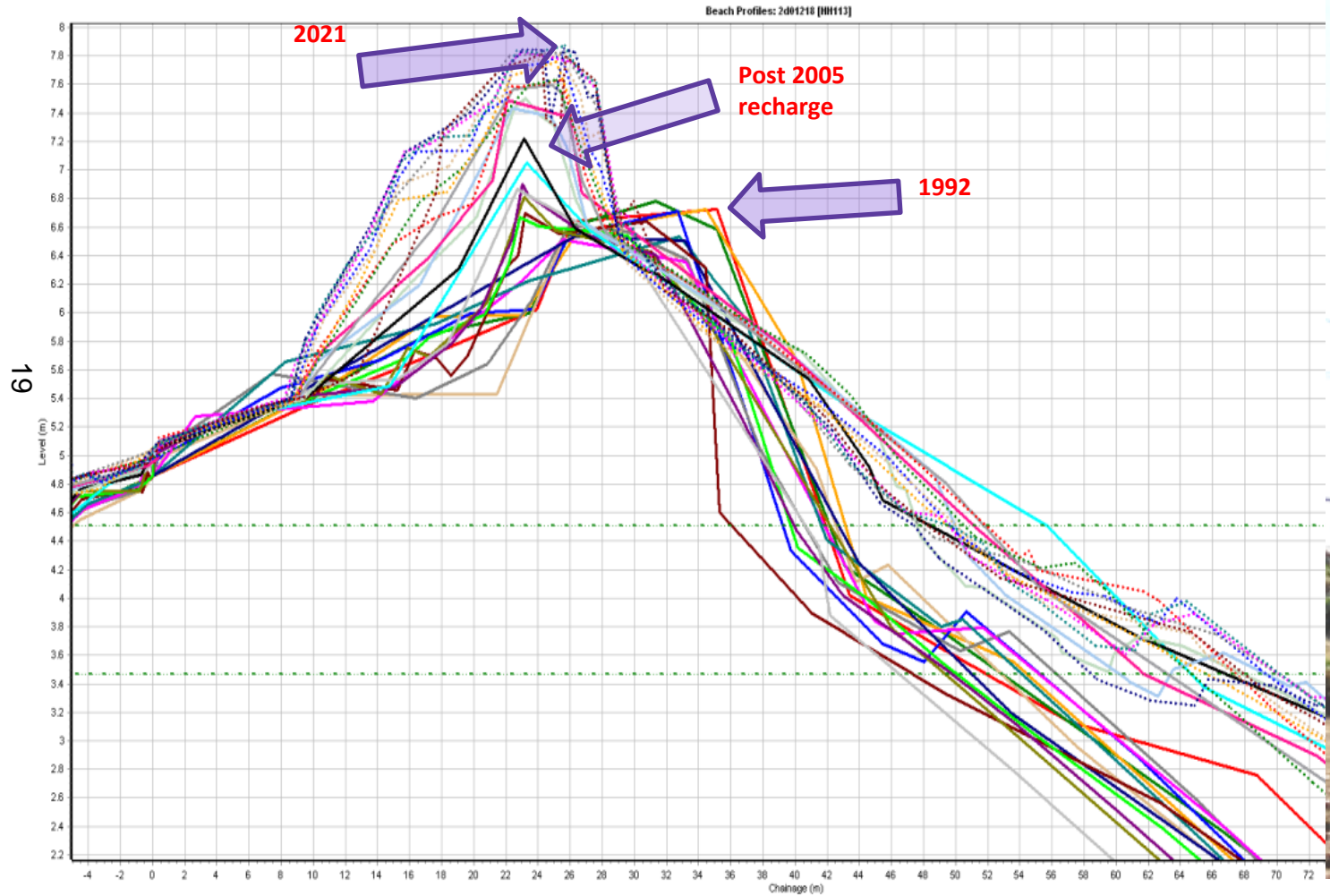


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# Challenge 1: Ridge Mobility



1992-2021 close-up of dune crest



# Challenge 2: Beach Recharge

- A small beach recharge was forecast for the near future.
- The initial planning has identified key challenges:
  - Cost
  - Technical feasibility
  - Environmental limitations
- At this time, beach levels are stable and therefore a recharge is not required.
- The recharge project has been stopped but recycling is continuing

20



# What this meant for us

We had likely reached a trigger for change in our flood risk management approach on this stretch of coastline.



## Unit C Initial Assessment



## Unit C Initial Assessment

# Key conclusions

- The WECMS economic trigger for change has been met.
- Annual beach recycling continues to be effective and sustainable.
- Human activity and damage on the ridge needs to be limited to allow it to perform its flood risk function.
- Sand continues to accumulate behind the crest of the ridge; this is likely to continue.
- The WECMS environmental and evacuation triggers have not been met.
- A full review of the strategy is required to determine the future management approach for Unit C.

# WECMS Review

Undertaking a full review of the WECMS will be a complex and time-consuming process due to the wide range of factors which each need to be considered in detail. This includes:



**The standard of protection provided by the defences**



**Coastal processes**



**Computational modelling**



**Consideration of a wide range of options and their potential technical feasibility**



**Stakeholder engagement**



**Environmental impact assessments**



**Funding calculations**



**Climate Change Allowances**

# WECMS Review Timeline



## Now – April 2025

### Prepare for WECMS review:

- Secure funding
- Continue writing the business case
- Update coastal modelling for the area

### Protect the ridge:

- Repairing existing damage where possible
- Continue enforcement on the shingle ridge
- Continue engaging with stakeholders, including advice to minimise footfall on the ridge
- Continue to support KLWNBC with planning applications in the area

### Ongoing maintenance:

- Continue beach recycling and annual monitoring

**April 2025**

Begin WECMS review

**2027/2028 onwards**

- Begin SMP policy update
- Implement the new WECMS strategy

# Engagement

- Media interviews – 30<sup>th</sup> July
- Cabinet briefing – 31<sup>st</sup> July
- Wash East Coast Management Strategy – Stakeholders Forum – 1<sup>st</sup> August
- RFCC member briefing – 1<sup>st</sup> August
- Snettisham Shingle Ridge drop-in event – 8<sup>th</sup> August
- Heacham Shingle Ridge drop-in event – 9<sup>th</sup> August
- E&C panel update – 3<sup>rd</sup> September
- RFCC – 17<sup>th</sup> October

25

# Key takeaway messages

- The challenges are unique and complex.
- We are actively progressing a solution through the upcoming WECMS review, but nothing has been predetermined.
- We want to work with the community and other partners throughout the process.
- As the primary defence, damage to and human activity on the ridge needs to be limited to allow it to perform its flood risk function.
- In the meantime, beach recycling is continuing.

26

**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Environment and Community Panel		
DATE:	3 <sup>rd</sup> September 2024		
TITLE:	Air Quality Action Plan		
TYPE OF REPORT:	Cabinet Report		
PORTFOLIO(S):	Climate Change and Bio Diversity		
REPORT AUTHOR:	Dave Robson		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	Yes

**REPORT SUMMARY/COVER PAGE**

<b>PURPOSE OF REPORT/SUMMARY:</b>
Revised Air Quality Action Plan for adoption and follow statutory guidance.
<b>KEY ISSUES:</b>
Members are directed to the attached report for full details of the key issues.
<b>OPTIONS CONSIDERED:</b>
Members are directed to the attached report for full details of the options.
<b>RECOMMENDATIONS:</b>
To consider the report and make any appropriate recommendations to Cabinet.
<b>REASONS FOR RECOMMENDATIONS:</b>
To scrutinise recommendations being made for an executive decision.

## 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
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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							

<p><b>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</b></p>	<p><b>Yes / No</b></p>	<p>This policy will help improve air quality within both AQMA and not impact relations within the communities.</p>
<p><b>3. Could this policy/service be perceived as impacting on communities differently?</b></p>	<p><b>Yes-/ No</b></p>	<p>This policy will not impact communities differently. Removing the Gaywood Clock AQMA shows improving air quality.</p>
<p><b>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</b></p>	<p><b>Yes-/ No</b></p>	<p>Policy follows statutory role and DEFRA's LAQM guidance.</p>
<p><b>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</b></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>	<p><b>Yes / No</b></p>	<p><b>Actions:</b> None identified</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>       <div style="text-align: center;">   <b>Decision agreed by EWG member: .....</b> </div> <div style="text-align: right;"> <b>...26 July 2024.....</b> </div>		
<p><b>Assessment completed by:</b></p> <p><b>Name</b></p>	<p><b>Dave Robson</b></p>	
<p><b>Job title</b></p>	<p><b>Environmental Health Manager</b></p>	
<p><b>Date completed</b></p>	<p><b>19<sup>th</sup> July 2024</b></p>	

Complete EIA Pre-screening Form to be shared with Corporate Policy ([corporate.policy@west-norfolk.gov.uk](mailto:corporate.policy@west-norfolk.gov.uk))

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:

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Report Reference Number	Final AQAP 2024-2029
Date	

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## 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>.

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<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

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<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.

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## 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

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# 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).

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<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).

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<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;

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<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:

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<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

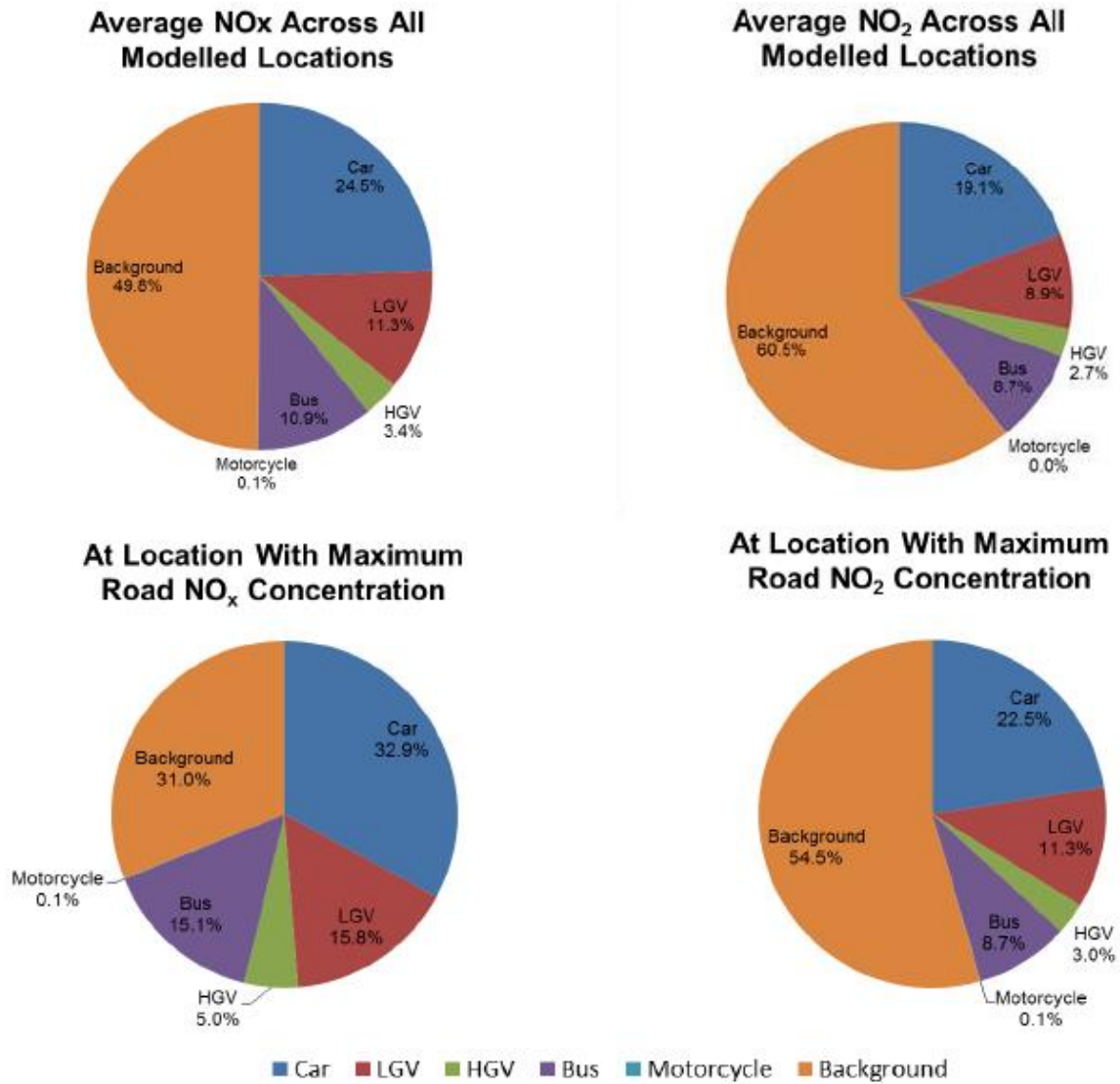
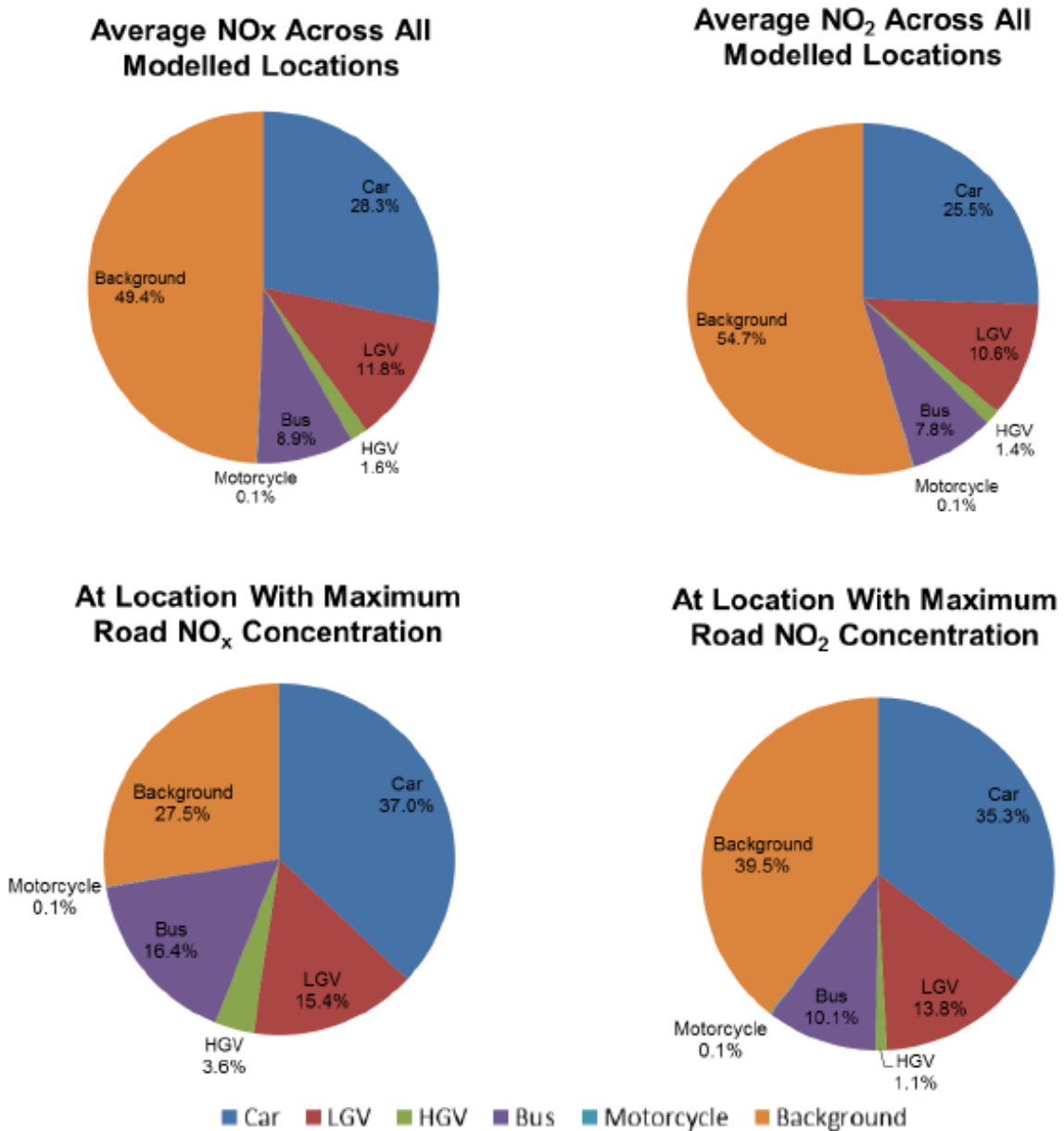


Fig 3.2: Source Apportionment for Gaywood Clock AQMA



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.

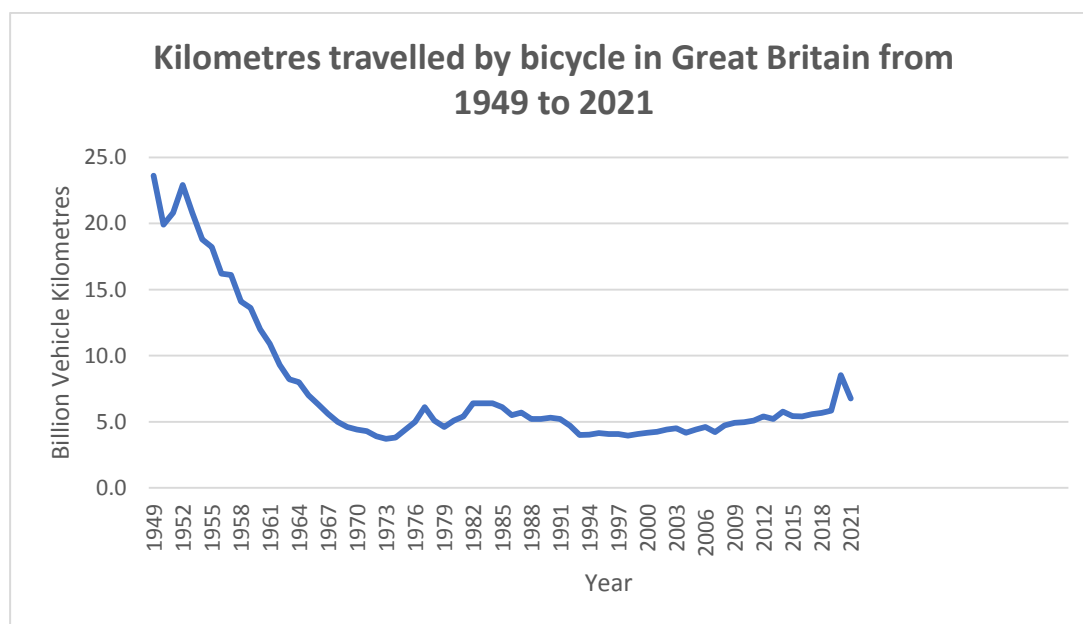
The Chief Medical Officer's Annual Report that was dedicated to air quality in 2022 (CMO, 2022<sup>2</sup>) highlighted this issue that by reversing some of the decline in bicycle trips as shown in Figure 3.3 would have substantial health benefits due to physical activity being built into the normal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

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<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

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<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>).

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<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.
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/active-and-clean-connectivity/">https://www.visionkingslynn.co.uk/project/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/active-and-clean-connectivity/">https://www.visionkingslynn.co.uk/project/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.	
65	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	NO2 / PM2.5 - 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	NO2 / PM2.5 - 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 NO2 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	NO2 / PM2.5 - 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	NO2 / PM2.5 - 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.

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.
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## 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):			

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## 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.

69

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).

70

## Appendix C:

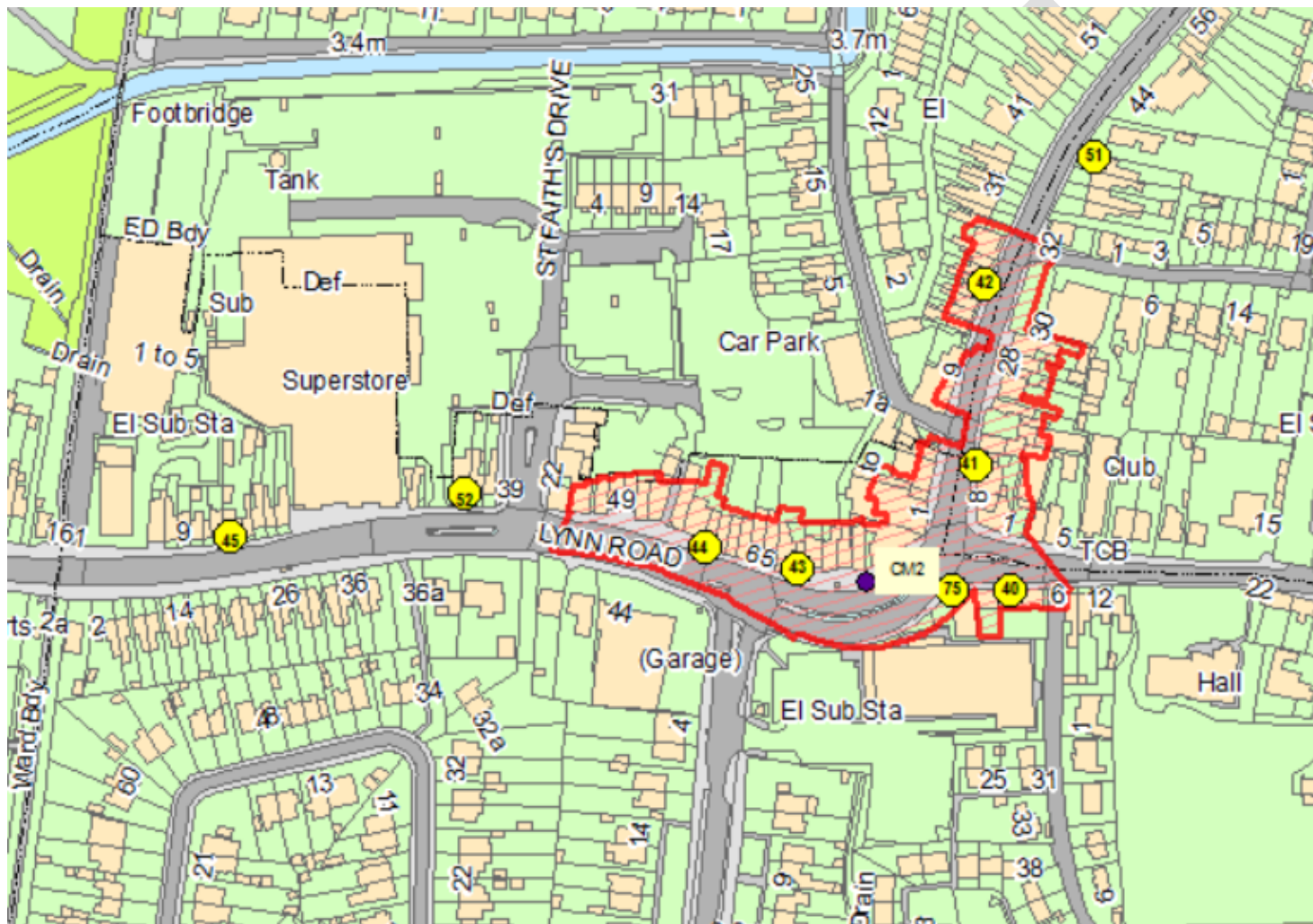
Figure C.1: Map of Railway Rd AQMA and location of monitoring sites



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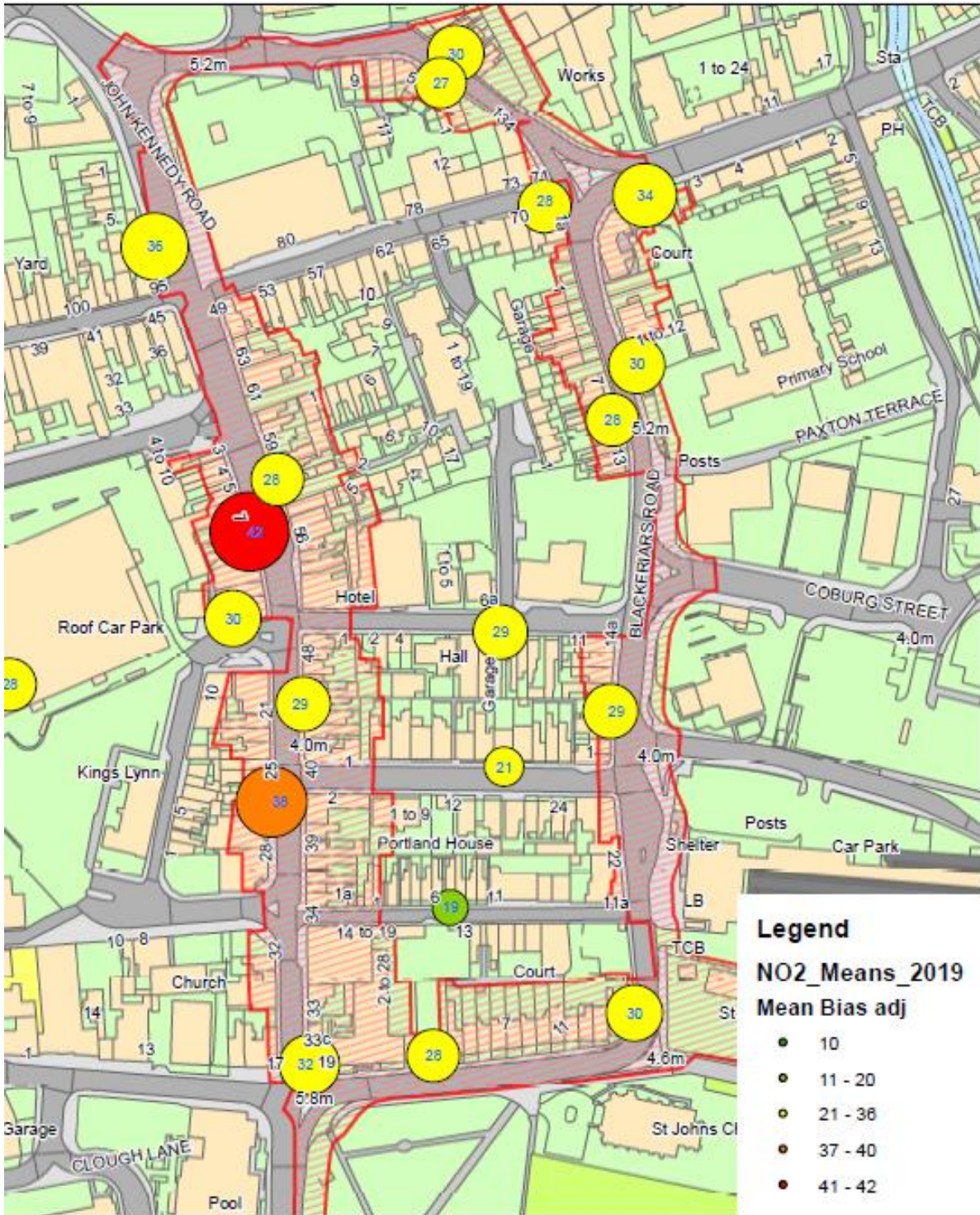


Figure C.2: Map of Gaywood Clock AQMA and location of monitoring sites



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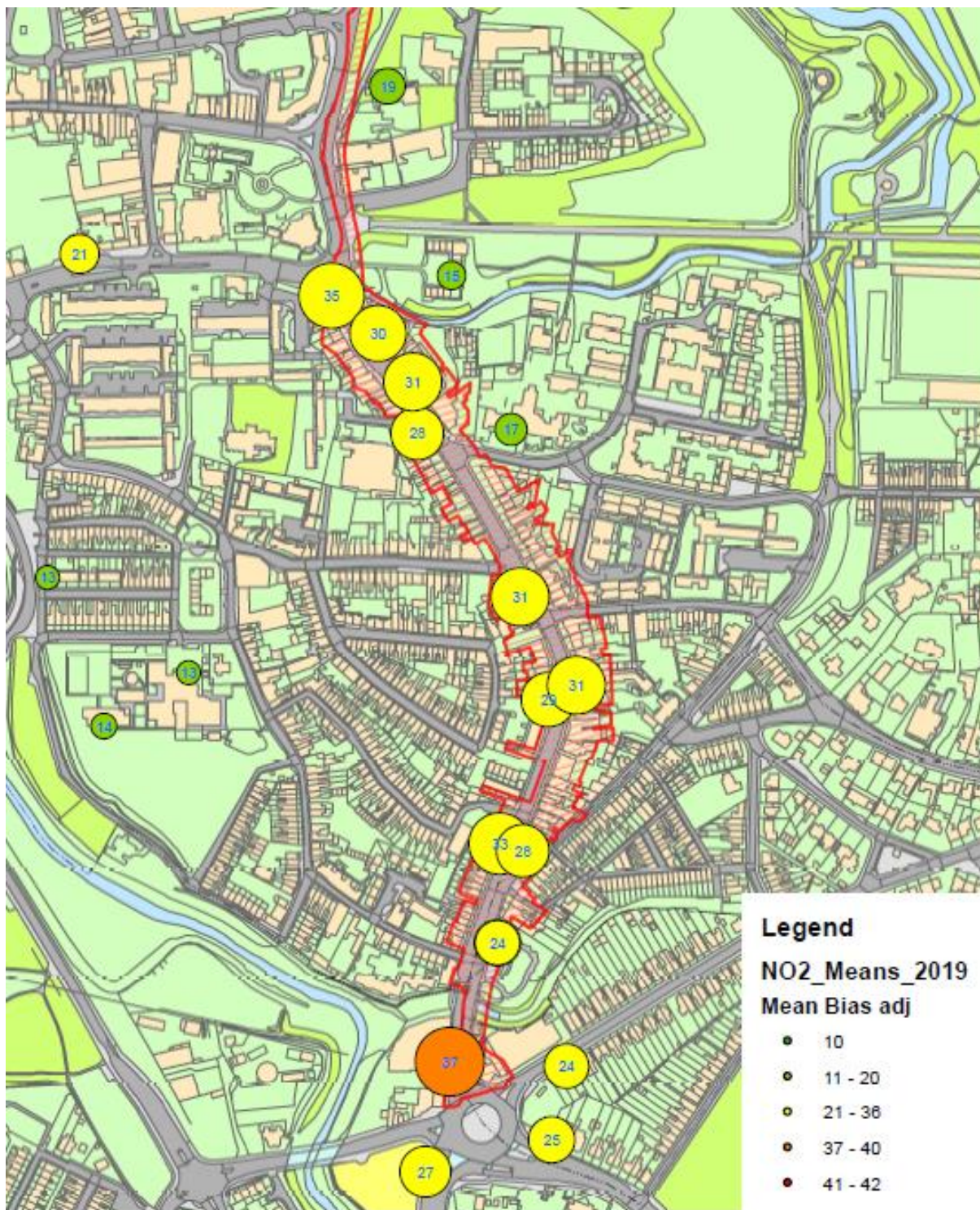
Figure C.3: Spatial Distribution of NO<sub>2</sub> (annual mean ug/m<sup>3</sup>) around Railway Rd AQMA



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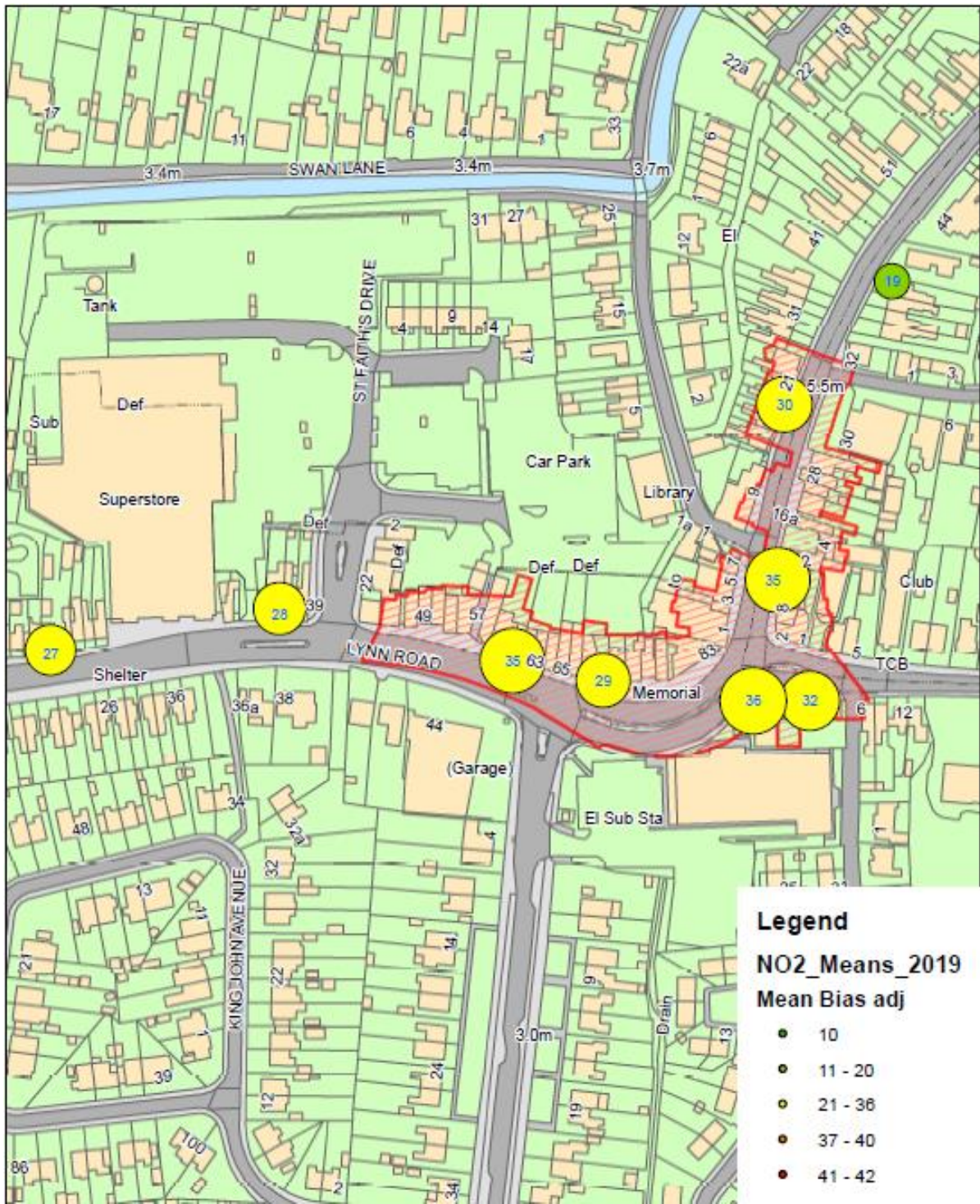
Figure C.4: Spatial Distribution of NO2 (annual mean ug/m<sup>3</sup>) around southern section of the Railway Rd AQMA



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



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

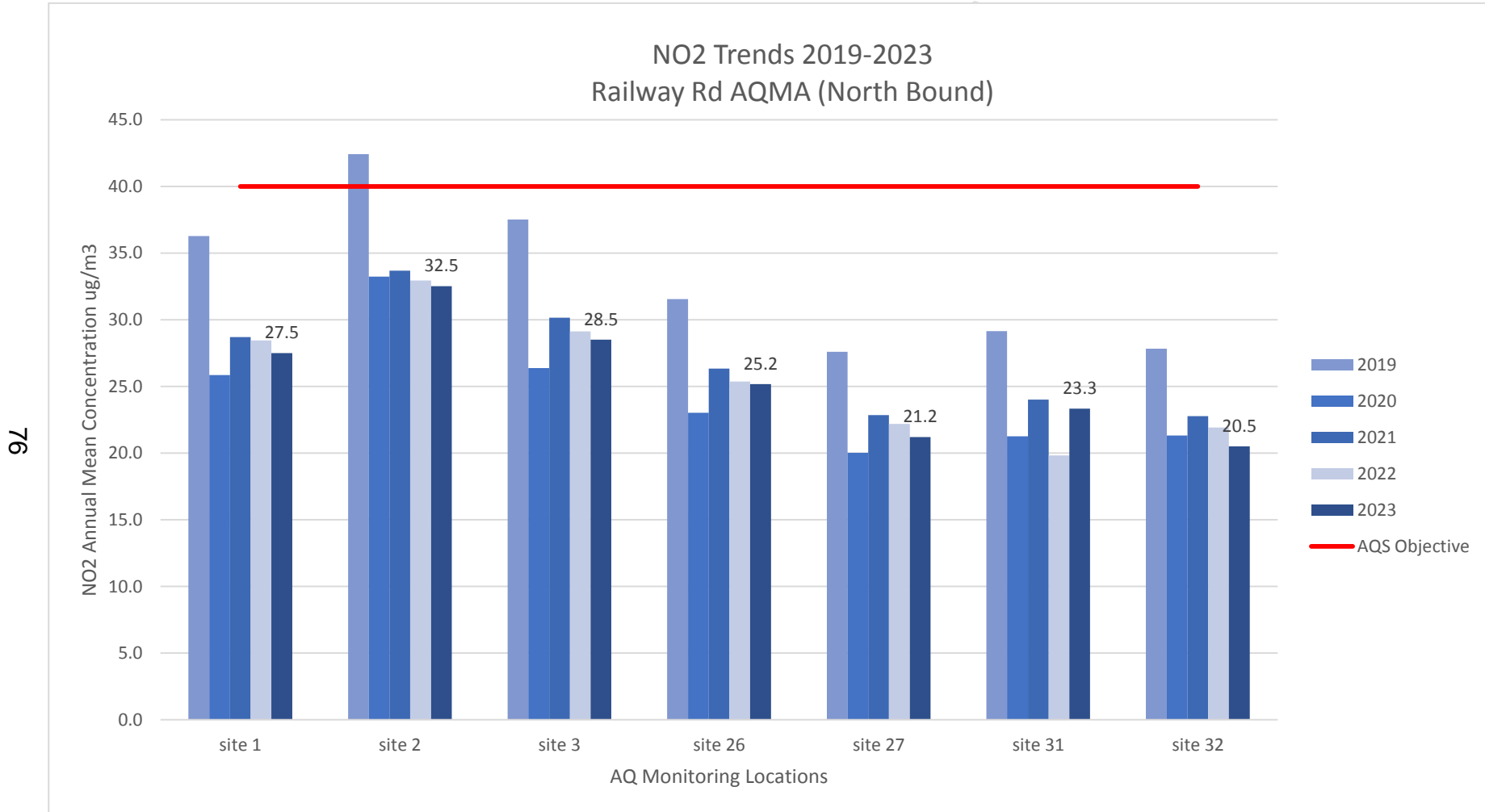




Figure C.7: Trends in NO2 annual mean ( $\mu\text{g}/\text{m}^3$ ) along south bound section of Railway Rd AQMA;

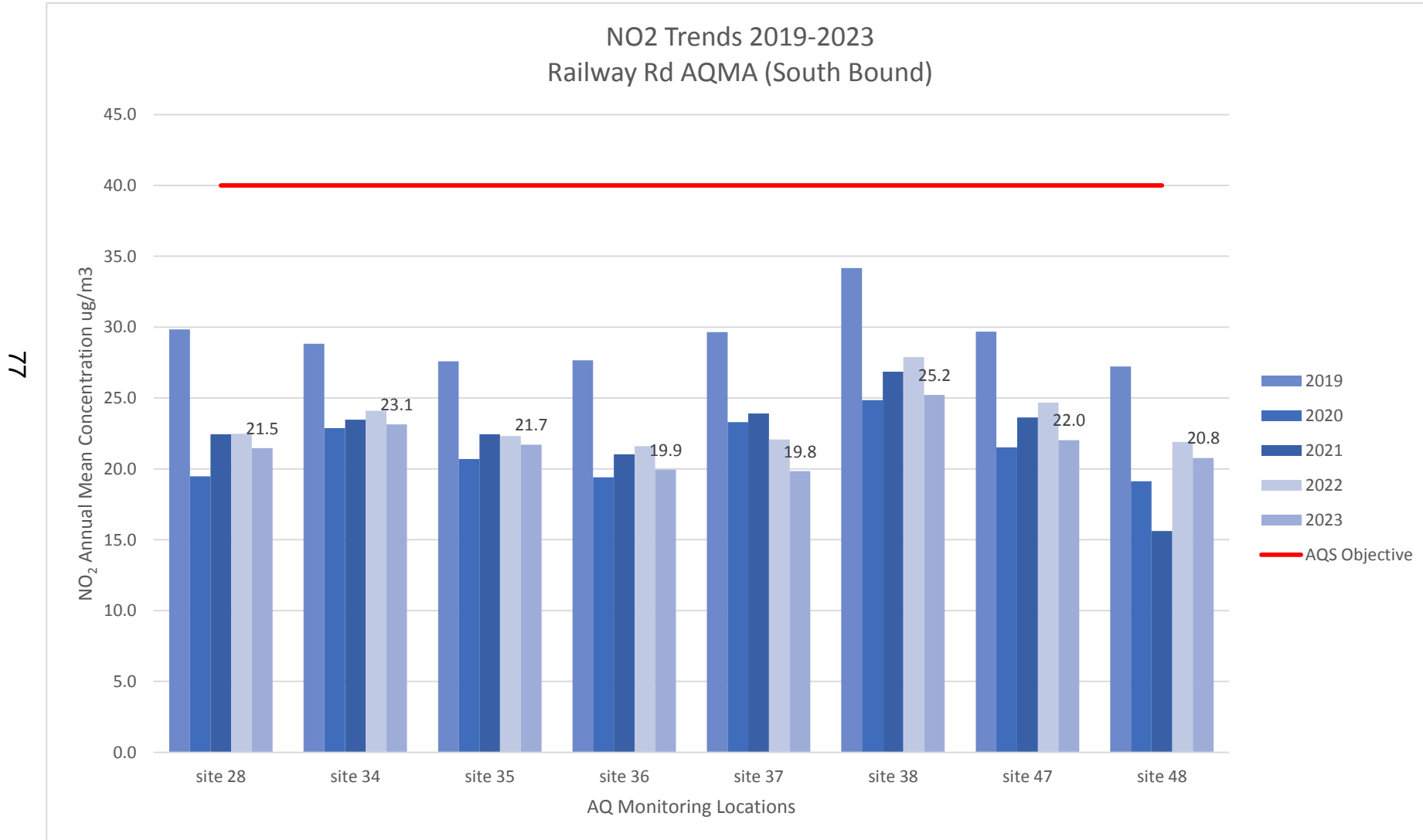
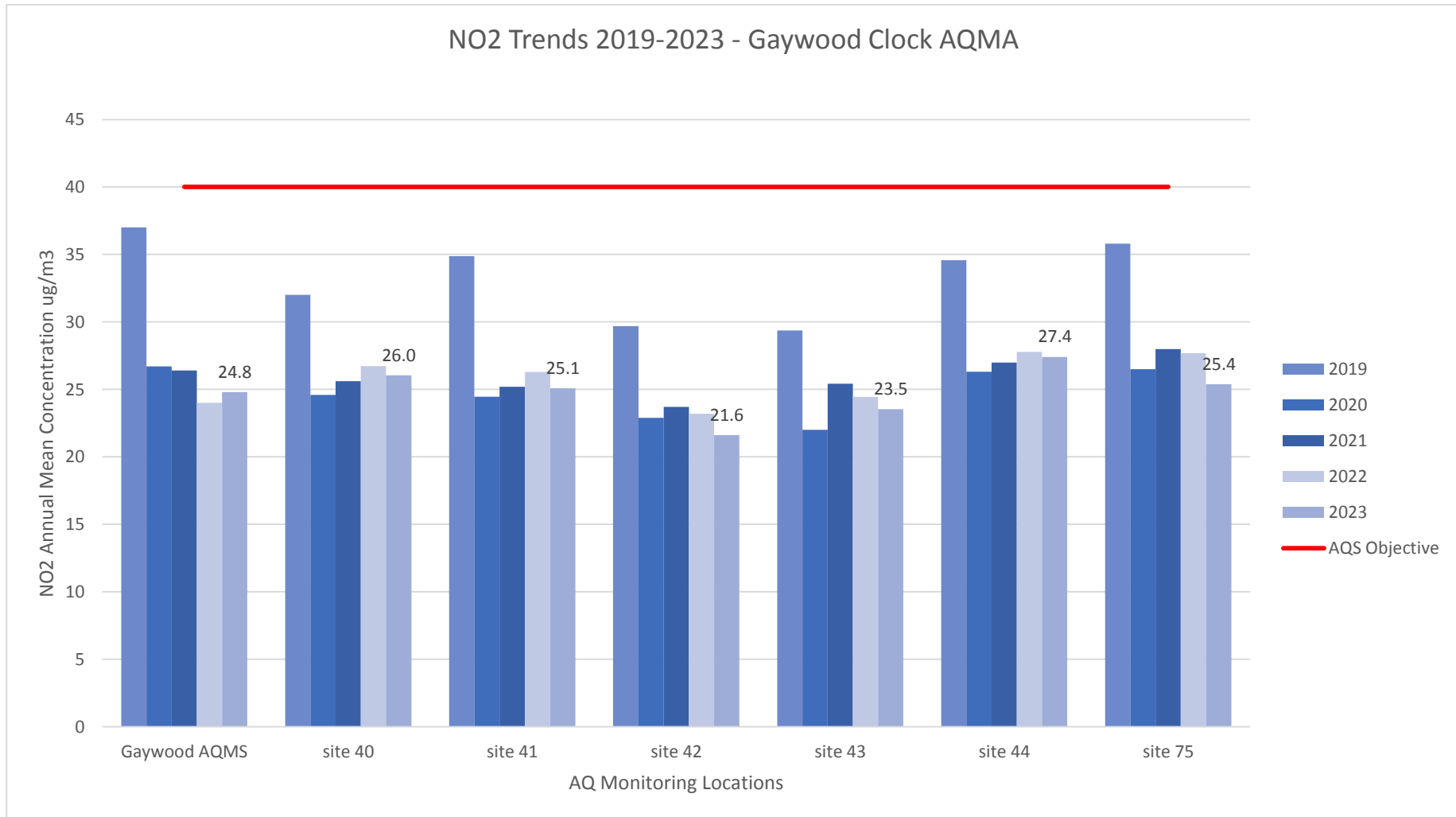


Figure C.8: Trends in NO2 annual mean ( $\mu\text{g}/\text{m}^3$ ) around Gaywood Clock AQMA;



87

## 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

### What further actions do you think should be included in the Air Quality Action Plan and why?

reducing the number of HGVs through urban areas, staggering school times to reduce traffic, more joined up multi agency working regarding road works/ closures,

No vehicles should be allowed to drop off children at school during the morning or collect children from school in the afternoons. Restrictions should be put in place at certain hours and cameras in place to fine offending vehicles that break this rule. Certain inner London Boroughs have this in place.

Liaise with train companies and MP to reduce cancellations and improve the service -reduce bus replacements at the weekend and to attract residents to use the train-Reduce fares

The plan is comprehensive and the actions should help to improve local air quality. Consideration should be given to rescinding the AQMA if levels remain consistently below the the threshold. This will then free up officer time to pursue measures to improve local air quality.

I believe that this Action Plan is a serious waste of time and of our Council Tax money. Instead the BCKLWN should focus on our poor local water quality issues (at beaches, the Wash in general, and other waterways).

Allow solar panels on listed buildings in town.

More dedicated cycle routes from rural areas into the town Promote car sharing  
Catch industry related pollution which is then caught by the wind.

As a council employee, the council could take many steps to contribute towards the plan: - replace its programme of issuing free parking permits to all employees with a plan that incentivises sustainable travel (e.g. discounts on purchasing bikes; discounts on local bus routes) - decommission some of the town centre car parks and use for social/affordable housing where flood risk allows) - reconsider its flexible working policy to reduce the amount of unnecessary commuting time. As a resident - improve cycle paths!

Safer cycling routes, completely separate from road traffic and ideally allowing cyclist access to the town centre (without the need to unmount) - this would help the less confidence riders to adopt this active way of transport.

Provide more EV charging points above national requirement.

Your planning processes need to be joined up. You rejected a plan for new houses in Gaywood which would have a new link to the Hardwick Estate. You then allowed a revised plan for a still significant number of houses in Gaywood but without the link to Hardwick. This forces a significant number of cars thru the Gaywood Clock area and increases pollution at that point.

put a park and ride in change the layout near Tesco at Gaywood. make the traffic lights into link with the one at wilco at Gaywood . and put bus lanes in though town with cycle lines

Lower speed limit (20mph) throughout the town (with possible exception for Edward Benefer Way and Nar Ouse Way). Any loss of engine fuel efficiency is counteracted by less time idling and less braking and acceleration. The calming effect is likely to encourage more people to switch to active travel.

I think Gayton and Gaywood Roads, all the way from the hospital to Norfolk Street and the town centre, is the perfect route for a tram line.

Imagine people all along the route just being able to walk out of their homes and step on a regular electric tram from early in the morning until late at night. Wootton and Grimston Roads up to Knights Hill would be ideal for a tramway too. Then people really would have a fantastic, future proof alternative to car ownership.

The BC and CC need to actually and physically prioritize people walking and cycling over those in cars. Pedestrian and cycle crossings should change immediately in favour of people walking and cycling, pavement parking must be banned and a significant increase in cycle parking spaces in the town centre and other key destinations.

Charges such as congestion or ULEZ should not be considered. This would disproportionately affect working people. Improvements to the frequency and cost of public transport from the wider area into KL should be prioritised if private car use is to be reduced.

You need to think about how people who live in the surrounding villages are going to manage as the public transport system is atrocious, some villages do not even have a bus service, so we're forced to use the car.

Encourage school children to walk to school to remove unnecessary traffic around school times. Around Gaywood community school and St Marthas school the smell of pollution at peak times is unbearable and I dread to think of the long term health implications on the children  
Speed limit in town 20 mph Far better active travel facilities i.e. bike parking in more areas Better routes across town rather than the present piecemeal approach

Mandatory 20mph limit throughout King's Lynn Centre. Greater focus on bicycle and pedestrian access as a priority over motoring.  
Look at the sequence of all traffic lights including Hardwick round about.

This scheme should just about kill the town centre off for good

### Response

Agreed in principle but main source of NO2 is cars and Buses not HGV.

Measure 1.1 will help improve school travel plans.

Issues surrounding roadworks are outside scope but will be passed to Highways.

Measure 1.1 will help improve school travel plans.

Other issues are not agreed and outside scope.

Background levels in London are higher; within King's Lynn levels are falling.

Comments noted but not directly linked to either Air Quality Management Area

Agreed and will be taken forward

Disagree, air quality directly impacts the health of local residents.

This process is not related to water quality (separate matter).

This is more of a planning matter.

Focus for the AQAP measures is pollution from road transport.

Noted but will be considered as part of LCWIP.

Promoting car sharing can form part of travel plans (Measures 1.2, 1.3 and 4.1).

Disagree. The main sources of air quality within King's Lynn is from road transport not industrial.

Measure 1.2 is to develop a workplace Travel Plan for BCKLWN.

Measure 3.3 will develop a car park strategy for King's Lynn.

Agreed in principle.

Measure 1.5 will help to improve the local cycling and walking infrastructure

Agreed in principle.

Measure 3.3 to develop a car parking strategy for King's Lynn will include additional EV provision.

Disagree. Planning decision are based on a number of factors including Air Quality. The air quality impacts for major developments are reviewed for air quality and if grant will include mitigation. Air quality in Gaywood Clock area has been falling for a number of years.

Measure 3.3 will develop a car parking strategy for King's Lynn to include viability of schemes such as park & ride.

Considered in long list of measure, not taken forward as not required due to general downward trend of NO2 levels in both AQMA

Comment noted but not taken forward as required due to general downward trend of NO2 levels in both AQMA. Cost of building a fully operational tram system would be expensive when compared to an improving air quality situation.

Agreed in principle.

Measures 1.1 to 1.6 support modal shift from cars to more sustainable transport.

Congestion charge was ruled out in the Long List of measure.

This matter is the focus of the King's Lynn Transport Strategy

Measure 1.1 will promote active travel to schools

Considered in long list of measures but not taken forward due to general downward trend of NO2 levels in both AQMA

Considered in long list of measures but not taken forward due to general downward trend of NO2 levels in both AQMA  
Measures 3.1 & 3.2 will review traffic management around the Southgates and one way system in King's Lynn.

Not agreed, the measures are designed to mitigate traffic related NO2 emission and are proportional with the current levels

One of the main causes of stationary, idling traffic is the sequencing of traffic lights. All too often a queue is stationary at a red light when the opposing green light lane has emptied of traffic. In most of Europe, night-time traffic lights are set at flashing amber for all traffic, and the rule is you give way to traffic from the left (or right in UK). Also, not enough use is made of filter lanes, where you could filter when a flashing yellow arrow permits you to filter subject to the usual "right of way" rules.

All rubbish

Public transport to the villages and towns is poor. If you want to promote better air quality, make it easier to use. Kings Lynn to Cromer via train would take 3.5 hours, where it would only take just over an hour driving. How is this a viable option for public transport

clarification of technical information i.e. sampling locations, type of sampling done and the data from the sampling? did you use portable AQM stations, Nox tubes that are collected monthly and analysed. How have the within limit samples been gathered A study of late night bus services and provision of into town evening busses to enable a boost to night time economy, and residents in outlying areas not to be reliant on taxis and cars, or stay at home because there is no public transport

Ban bonfires and wood burners for households with gas and oil central heating. My wife and I walk a lot you can smell and taste the fumes from wood burners we try to keep fit with regular walking but the air Quality is putting us off so we use the car more which is adding to the pollution . As you cannot control what is burnt on a wood burner I can not see how you are going to enforce what is burnt in them.

Look at heating/solar projects

Park & Ride for King's Lynn with access via Saddlebow Roundabout.

I think all planning applications submitted to the council which have fires/burners proposed should be objected to by the Environmental Health team/s. This will help to prevent further increases in emissions in all areas of West Norfolk

Students from Reffley and the new Knights Hill development need to have a safe route of getting to King's Lynn Academy KLA. There is the option of having a cycle-path and footpath all along Gaywood River. This would also link up then south of Lynnsport to the existing network. It is not safe at the moment for people to cycle on the Wootton Road. The report states Park and Ride not being considered. This should be an option put to people. Bus based park and ride needs to be added. Improved bus shelters. Electric Buses.

I strongly agree with all of the aspirations but there needs to be concrete actions, targets or timescales, for an effective action plan. Seven of the ten measures are ongoing and they lack clarity. Term used such as review, improve, promote, consider do not explain exactly what is planned. There needs to be measurable targets that say by when and how success will be recognised or measured. The roll out of low NOx buses', for example ' needs how many and by when. 'Help to deliver' is too vague. There needs to be more moni

I strongly agree with all of the aspirations but there needs to be concrete actions, targets or timescales, for an effective action plan. Investment should be made in improving and providing new and additional cycle and walk routes and these should be included in any planning applications, especially near schools. A park and ride scheme should be considered to help people who work in the town centre and should include the hospital. Both these schemes would reduce pollution and save money to residents for parking.

As s Kings Lynn resident I see the above list as including all the actions likely to be effective in reducing air pollution. If BCKLWN proceeds with these actions, I hope these do go ahead, then there has to be strong commitment from from Cllrs, officers and staff together with Council partners. I welcome actions to improve air quality but actions need to proceed with a joined up plan with the Council, its partners, residents, businesses, those who work in or visit BCKLWN area.

In addition to the above, I feel the Council could start a public campaign to make the public aware of how air pollution is impacting the health of our children and the environment. It would also be some of the ways to cut emissions in line with the net zero targets imposed by central government

A review of current base levels would be useful, particularly as the proposed incinerator in Wisbech is likely to have a major impact on air quality in King's Lynn.

I have not ticked any of these boxes because they do not contain concrete actions. Reviewing, improving, developing, helping, promoting, supporting, working with: these are activities. It is impossible to say whether these might be effective in reducing air pollution. For example: 'promote behaviour change': the effectiveness of this activity depends entirely on how the Council plans to do it. Reviewing measures, changes (3.1, 3.4) might be effective if the review resulted in any action.

These all appear to be sensible actions thought it is difficult to answer 1.2, 1.4, 3.3 without having more details, for instance location and nature of travel hubs. However, establishing a base-line for air quality is essential followed by frequent and thorough monitoring of progress (including of public health gain) throughout the Borough with definite and ambitious goals in mind. In addition, there should be regular reports (at least annually) to Council, the public and interested parties such as schools on progress.

Work regarding this issue will be considered further as part of the Gyratory and Southgates projects.

Work has already been carried out to optimise the traffic light system in King's Lynn.

Noted, not agreed.

Noted but outside the scope of the AQAP.

This information is readily available on our website e.g. monitoring location, types of monitors.

These types of emissions will be reviewed as part of the Borough wide Particulate Matter project

Noted but not directly related to traffic related emissions.

BCKLWN part of the Norfolk Solar Together project to promote PV solar provision

The Car Parking Strategy will review this area

Noted but not directly related to traffic related emissions. Env Quality already review planning applications and make recommendations on mitigation measures.

Measure 1.5 will implement the LCWIP.

Concerns regarding park and ride will form part of the parking strategy for King's Lynn (Measure 3.3).

Noted - to deliver on the measures as agreed

Noted - to deliver on the measures as agreed

Noted

Agreed and taken forward in Measure 5.1 & 5.2

Previous air quality monitoring data is freely available from Council's air quality webpages. Proposed Medworth EfW plant is outside this scope of the AQAP but is being dealt with as a separate issue.

Noted - to deliver on the measures as agreed

Previous air quality monitoring data is freely available from Council's air quality webpages

Complete the LCWIP primary corridor projects much sooner than 2030, so that the second round can start. Consider more smaller active travel hubs at bus stops in Downham Market and key villages with frequent bus services. Abandon the white elephant South Lynn "hub" (primarily a car park) that does not meet NCC's definition of a travel hub and transfer its funding to the LCWIP.

Noted - to deliver on the measures as agreed

Respondent	Event	Date	Comments
Member of Public 1	Gaywood Library Drop-in	05/02/2024	<p>Broadly supportive over the AQAP priority Measures, but concerned about traffic from the Parkway development. Welcomed more competitive bus fares though BSIP (Measure 2.1) but thought bus operating times should be extended.</p> <p>Thought the AQAP should be more ambitious.</p> <p>Specific comments raised;</p> <p>M 2.1 BSIP; Bus services could be promoted better through improved information systems. The operating times on some routes could be extended (early / late).</p> <p>M 1.5 LCWIP; Concern over the implementation of LCWIP, plus the extent of secure cycle parking spaces in town centre. There needs to be better connectivity with the prioritised LCWIP routes in KL. Better promotion of walking.</p> <p>M 1.4 Travel Hubs; Active Travel Hub in South Lynn appears to be isolated; concern over the extent of mode shift secured.</p>
Member of Public 2	Gaywood Library Drop-in	05/02/2024	<p>M 3.3 Parking Strategy; To review town centre's Tuesday Market Place car park to allow other uses.</p>
Member of Public 3	Gaywood Library Drop-in	05/02/2024	<p>Broadly supportive over the priorities within AQAP but concern over Gaywood Clock from additional traffic. Sceptical that travel plans are an effective tool to reduce vehicular demand.</p> <p>Broadly supportive over the AQAP priorities with the following additional comments;</p> <p>M 3.1, M 3.2 Southgates / Gyrotory Transport schemes; These transport infrastructure schemes will need to improve traffic flows and reduce congestion in KL.</p> <p>M 2.1, M 2.2; Would like to see better, lower emission buses and improved information systems to promote the necessary modal shift;</p>
Member of Public 4	Gaywood Library Drop-in	05/02/2024	<p>M 6.1 Project on PM10 / PM2.5; Concern over extent of harmful particulate</p>
Member of Public 5	Gaywood Library Drop-in	05/02/2024	<p>Broadly supportive over the AQAP priorities with the following comments;</p> <p>M 2.1 BSIP; Would welcome an improvement in bus service provision (number of stops, better routes to connect to key employment destinations e.g. a circular bus route around KL).</p> <p>M 3.3 Parking Strategy; Thought King's Lynn needs a park and ride;</p> <p>M 3.4, M 5.2; Concerned over pollution levels at Gaywood Clock (at peak times), including the number of additional HGVs during construction of Florence Fields (Parkway) housing development off the Gaywood Clock AQMA junction.</p>
Member of Public 6	King's Lynn Library Drop-in	12/02/2024	<p>M 1.5 LCWIP; Would like to see improvements to the LCWIP prioritised routes in the Gaywood, Woottons / Knights Hill areas</p> <p>Broadly supportive of measures and priorities</p>

Who are you:		
Local Resident	39	88.6%
Council	0	0.0%
Organisation	3	6.8%
Outside of the area	2	4.5%
Other	0	0.0%
<b>Total</b>	<b>44</b>	

**Please provide details:**

20's Plenty for King's Lynn. Campaigning for sensible speed limits since 2010.

West Norfolk Green Party

Fenland and West Norfolk Friends of the Earth local group

Please state whether you agree that the following actions from Table 5.1 will be effective in reducing air pollution in the BCKLWN?	Strongly Agree		Agree		Neither Agree or Disagree		Disagree		Strongly Disagree		Don't Know	
1.1 - Improve active travel in Schools	23	52.3%	11	25.0%	5	11.4%	1	2.3%	1	2.3%	3	6.8%
1.2 - Review and update the Council travel plan	16	36.4%	14	31.8%	10	22.7%	2	4.5%	0	0.0%	2	4.5%
1.3 - Development of other workplace / business travel plans	12	27.3%	15	34.1%	11	25.0%	1	2.3%	1	2.3%	4	9.1%
1.4 - Development of active travel hubs	12	27.3%	15	34.1%	9	20.5%	3	6.8%	2	4.5%	3	6.8%
1.5 - Implement local cycling and walking infrastructure plan (LCWIP)	26	59.1%	9	20.5%	6	13.6%	1	2.3%	1	2.3%	1	2.3%
1.6 - Support use of West Lynn Ferry	16	36.4%	15	34.1%	10	22.7%	1	2.3%	1	2.3%	1	2.3%
2.1 - Work with Norfolk County Council to help deliver their Bus Improvement Plan (BSIP)	23	52.3%	15	34.1%	4	9.1%	0	0.0%	1	2.3%	1	2.3%
2.2 - Help deliver the roll out of low NOx Buses in Kings Lynn	20	45.5%	18	40.9%	4	9.1%	0	0.0%	1	2.3%	1	2.3%
3.1 - Review changes to the road system within the Kings Lynn town centre gyratory system (Railway Road AQMA)	16	36.4%	14	31.8%	7	15.9%	3	6.8%	2	4.5%	2	4.5%
3.2 - Review traffic related changes as part of the Southgates masterplan	16	36.4%	13	29.5%	11	25.0%	0	0.0%	3	6.8%	1	2.3%
3.3 - Develop and implement a comprehensive car parking strategy for Kings Lynn	16	36.4%	8	18.2%	10	22.7%	2	4.5%	5	11.4%	3	6.8%
3.4 - Review measures to improve traffic flow though Gaywood Clock AQMA junction	17	36.6%	13	29.5%	6	13.6%	2	4.5%	4	9.1%	2	4.5%
4.1 - To consider air quality from new developments and secure mitigation and any offsetting of emissions in accordance with best practice	19	43.2%	14	31.8%	7	15.9%	0	0.0%	2	4.5%	2	4.5%
5.1 - Promote behaviour change from individuals and employers	20	45.5%	8	18.2%	10	22.7%	0	0.0%	3	6.8%	3	6.8%
5.2 - Improve public awareness (Air Quality Monitoring and Information)	19	43.2%	11	25.0%	10	22.7%	1	2.3%	1	2.3%	2	4.5%
6.1 - To develop an Air Quality project to review impact of PM10 & 2.5 across the district	18	40.9%	11	25.0%	10	22.7%	0	0.0%	1	2.3%	4	9.1%



Written/ Email	Comment	Response
<p>Member of Public working with South Wootton Council</p>	<p>Summary of comments raised:            Wanted to highlight that the AQAP priorities as proposed that focus on active travel / modal shift, followed by improvements to public transport system, align to national (DfT) hierarchy.            Raised a general concern that the switch to electric vehicles whilst reducing air pollution, will not completely solve the problem e.g. increased brake and tyre wear emissions.            Specific comments made in terms of priority measures as follows;  <b>Priority 1 Active Travel Measures;</b> raised concern that the active travel / mode shift measures will need to be evidence based. Also concerned with pollution levels that children are exposed to when walking / cycling to school.  <b>Priority 2 Public Transport Measures;</b> BSIP (M 2.1) should ensure buses link to key employment destinations. Regarding reduced NOx emissions (M 2.2) from buses, the numbers of buses declined following a review by NCC in 2018. M2.2 may be anti-competitive and contrary to state air regulations.  <b>Priority 3 Transport Schemes;</b> Concerned about the extent of modal shift secured through the major transport infrastructure schemes as planned. Welcomed the inclusion of a Car Parking Strategy (M 3.3) but thought that current parking charges encourage peak time congestion. Would welcome a review into the charges.  <b>Priority 4 Planning;</b> Suggests that priority-4 measure is arguably the most welcome priority measure. Advocates planning policy that reduces number of car park spaces below NCC guidelines.  <b>Priority 5 Public Awareness / Behaviour Change;</b> Public awareness campaign work should be of less priority than the measures that aim to reduce traffic and secure public transport improvements.  <b>Priority 6 WN AQ-Health based Project;</b> The measure lacks detail to comment on.            Requests the following additional projects to be included; (a) For a review of bus services including a service to Hunstanton and beyond; and, (b) to examine feasibility of a new train station in the vicinity of Hardwick.</p>	<p>It is noted that AQAP priorities align to national priorities.            Issues around brake and tyre wear emissions relate to PM not NO2 which is the focus of the AQAP. PM to form part of wider review under Measure 6.1.  <b>Regarding comments on;</b>            a) Priority-1; In relation to AQAP measures to be evidence based, this is noted; measures will need to be specific / delivered. In terms of pollution levels that children are exposed to when travelling to school, around the Gaywood schools, pollution levels have improved from previous years. It has been compliant for a number of years (more than 5-years).            b) Priority-2; Concern regarding buses to link to employment desitinations - the BSIP aims to make buses a more attractive option through a number of measures. In terms of M 2.2 that the source apportionment study is not representative of the decline in buses since, it is accepted that if the number of buses has declined this would affect road-NOx, but it is dependent on relative proportions and age of fleets. The relative proportions were correct in 2017, and considered adequate to inform this AQAP measure aimed at reducing any disproportionate affect. Some operators are running much older buses than those deployed in some other areas. In terms of M 2.2 being anti-competitive, we do not agree as DfT offer funding for reduced emission buses that has been successfully bid for elsewhere.            c) Priority-3; re: modal shift from major transport schemes - this is a matter for the transport schemes. Parking charges included in M 3.3.            d) Priority-4; re: to reduce parking spaces in new developments - this is a local planning policy matter.            e) Priority-5; Agreed with comments.            f) Priority-6; Measure lacks detail as it is still being developed.  <b>Additional items;</b>            (a) Review of bus service routes;            (b) Train Station in vicinity of Hardwick;</p>
<p>South Wootton Parish Council</p>	<p>Concerns raised in general with the extent of traffic generated from 5 major developments around the South Wootton area that is in addition to HGVs on main haul route into the docks (Grimston Rd - Edward Benefer Way). Suggests that the traffic generated could be mitigated through an improved bus service. The Parish Council fully supports / endorses response from member of public that they have been working with.</p>	<p>In terms of mitigation of traffic generated from developments coming forward, the major schemes will be required to implement sustainable travel plans. Bus service improvements form part of the AQAP through M 2.1 and 2.2. We have reviewed the principal pollution sources in the worst affected area and is the reason for M 2.2 (to reduce NOx contribution from buses). Buses pull out of bus station only a short distance away from the worst affected area.</p>
<p>South Norfolk and Broadland Council</p>	<p>Concerned over the measures that target the area with highest NO2 concentrations. Would welcome more discussion and insight into combatting pollution at this location.</p>	

### Summary of draft AQAP Measures

Priority & Measure No.	Measure	Start Year	Estimated Completion Year	Organisations Involved	Comments	Funding
1.1	Improve active travel to schools	2024	On-going	Norfolk CC Schools	To promote active travel to schools. Propose to measure success by no. of schools with interventions taken but targeted around the AQMAs. Norfolk County Council already provides access to Modeshift Stars software to all schools so they can generate and manage their own travel plans, as well as offering a range of other road safety and active travel measures such as Bikeability and online learning (Step On It, Ride On It, seat belt safety).	Norfolk County Council funded.
1.2 98	To develop a BCKLWN Travel Plan	2024	On-going	BCKLWN Sustrans	Developing a green travel plan forms part of the council's Climate Change Strategy. This will focus on commuting and business travel. Sustrans are helping to promote.	Part of £6.1m Town Deal & Business Rate Pool bid. 6 large employers in King's Lynn taking part.  Work has commenced in creating and implementing a travel plan.
1.3	Development of other workplace / business travel plans	2024	On-going	BCKLWN Private businesses	BCKLWN are working with a number of businesses (6) to help implement workplace travel plans but also to assess any barriers to their wider implementation e.g. <a href="https://www.visionkingslynn.co.uk/projects/active-and-clean-connectivity/">https://www.visionkingslynn.co.uk/projects/active-and-clean-connectivity/</a> . Measure forms part of corporate Active & Clean Connectivity Town Deal project.	Part of £6.1m Town Deal & Business Rate Pool bid. 6 large employers in King's Lynn taking part.

Priority & Measure No.	Measure	Start Year	Estimated Completion Year	Organisations Involved	Comments	Funding
1.4	Development of Active Travel Hubs	2024	On-going	BCKLWN Norfolk CC	Phase-1 comprises the Nar Ouse Enterprise Zone in South King's Lynn and Phase-2 a travel hub within the existing Baker Lane Carpark with additional secure cycling provisions. Forms part of corporate Active & Clean Connectivity Town Deal project.	Part of £6.1m secured from Town Deal & Business Rates Pool. Design & Build Stage RIBA Stage 4 underway.
1.5 78	Implement local cycling and walking infrastructure plan (LCWIP)	2024	On-going	Norfolk CC BCKLWN Sustrans	LCWIP 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. Link to the plan via NCC website; <a href="https://www.norfolk.gov.uk/39084">https://www.norfolk.gov.uk/39084</a>	Part of £6.1m secured from Town Deal & Business Rates Pool LCWIP schemes further feasibility/design underway, delivery profile received and under review. This forms part of the King's Lynn sustainable transport and regeneration scheme (STARS) <a href="#">£24 million to boost King's Lynn transport infrastructure (Levelling Up Fund 2) - Case study - GOV.UK (www.gov.uk)</a> This will see £24 million of Levelling Up Funding (tranche 2) delivering Active Travel measures as part of Southgates Master Plan and Gyrotory.
1.6	Support Use of West Lynn Ferry	2024	Medium Term Plan 2030	BCKLWN NCC	Continued operation of Ferry Service. Linked to Car Park Strategy (Sail and Park). KLWN and NCC have jointly funded a feasibility study into the ferry infrastructure improvements.	£40K funding jointly funded by Borough Council of King's Lynn and West Norfolk and Norfolk County Council to complete feasibility study

Priority & Measure No.	Measure	Start Year	Estimated Completion Year	Organisations Involved	Comments	Funding
2.1	Work with Norfolk County Council to help deliver their Bus Service Improvement Plan (BSIP)	2024	2024/2025	Norfolk CC BCKLWN Bus Operators	A range of bus infrastructure and support measures have been identified that have DfT funding. Measures include cheaper fares for the under 25's, new bus lanes, plus new / improved travel hubs e.g. Hunstanton.	£50m Funding secured from DfT, scheme in development. The project team is in place and the work is on schedule as per the programme
2.2	Help to deliver roll out of Zero Emission Buses in King's Lynn	2024	TBC (funding dependent)	NCC Bus Operators	Measure identified from a review of source apportionment study carried out by Bureau Veritas. This showed that bus NOx emissions are around half of cars, but a fraction of total flows. Improving bus fleet (replacing older Euro stock) will reduce any disproportionate effect.	Measure is supported by Norfolk County Council (including Public Health). It is currently unfunded but Norfolk County Council 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).	2024	2025	Norfolk CC BCKLWN	The preferred options are to be reviewed for AQ. The transport scheme stems from Kings Lynn Area Transport Strategy (KLATS), which involves redesigning the gyratory system with improved cycle and walking as needed for the town centre and a re-routing of buses.	Part of £24.5m LUF2 award for STARS – see details in measure 1.5 above. Funding secured, scheme in development.
3.2	Review traffic related changes as part of the Southgates Masterplan	2024	2025	Norfolk CC BCKLWN	The preferred options are to be reviewed for AQ. Southgates transport scheme stems from KLATS. To reconfigure the existing Southgates roundabout to a form that is better suited to public transport and active travel modes.	Part of £24.5m STARS LUF2 award. Funding secured, scheme in development, see measure 1.5 for further details. Outline Business Case submission expected early 2024 Scheme delivery 2026-2027

Priority & Measure No.	Measure	Start Year	Estimated Completion Year	Organisations Involved	Comments	Funding
3.3	Develop and implement a comprehensive Car-Parking Strategy for King's Lynn	2024	On-going	BCKLWN	Air quality matters are to be considered within the Council's draft car parking strategy. Provision of additional EV charge points	AECOM appointed to carry out review, report expected later in 2024
3.4 68	<del>To revoke the Gaywood Clock AQMA.</del> Review measures to improve traffic flow through Gaywood Clock AQMA junction	2024	2024	Norfolk CC BCKLWN	<del>Measure derived from KLATS.</del> <del>To review measures to improve traffic flows through the AQMA junction.</del> This Measure (3.4) is to be reviewed as per the Council's Air Quality Annual Status Report, as NO2 levels in the Gaywood Clock AQMA area have been below the NO2 annual mean objective for more than 5 years. An updated AQ monitoring scheme as required by planning for the Parkway development is to be implemented in 2024.	<del>Review of Gaywood Clock AQMA to be completed latter in 2024 with possibility of revocation as no NO2 exceedance over last 5 years</del>
4.1	To consider air quality from new developments and secure mitigation	2024	On-going	BCKLWN	We report on the number of planning applications that were reviewed for AQ every year within the Annual Status Report. Last year we reviewed 142 applications. Measure includes reviewing the larger planning applications for air quality and securing mitigation where necessary. On-going statutory work.	Officer post in place and will continue this area of work going forward. Details will be reported in Annual Air Quality Reports
5.1	Promote behaviour change from individuals and employers	2024	On-going	Norfolk CC BCKLWN	Working with NCC Public Health to better engage the public through a behaviour change programme, including the use of social media to be more aware of taking personal responsibility for	Officer post in place, joint work with NCC Public Health.

Priority & Measure No.	Measure	Start Year	Estimated Completion Year	Organisations Involved	Comments	Funding
					reducing air pollution through a number of measures e.g.; <a href="#">Clean Air Day</a> , <a href="#">Defra's Burn Better, Breathe Better campaign</a> , anti-idling, working with schools, indoor AQ etc, NCC journey planning toolkit <a href="http://www.travelnorfolk.co.uk">www.travelnorfolk.co.uk</a> Officers to undertake specialist behaviour change training to embed techniques in policy development. We work closely with other authorities in Norfolk through the Norfolk Countywide Air Quality Group.	
5.2 06	Improve Public Awareness (Air Quality Monitoring and Information)	2024	On-going	BCKLWN NCC	Raising public awareness is recognised as an important function of the air quality work of which improved air quality monitoring forms part. To review KL AQ monitoring and information systems.	Officer post in place, joint work with NCC Public Health.
6.1	To develop an Air Quality Project based on review of PM10 and PM2.5 across the district.	2024	2029	Norfolk CC Public Health BCKLWN	Develop a project to review, monitor and reduce levels of PM10 & PM2.5 district wide. We are working NCC Public Health and other specialists to develop the role.	Project being framed with NCC Public Health

Other potential additions:

Education and Information campaigns to encourage more responsible driving and the use of alternative modes (start year 2024/ongoing), NCC/BCKLWN/ Norfolk County Council have set up [www.travelnorfolk.co.uk](http://www.travelnorfolk.co.uk), a journey planning tool, to raise awareness of alternative modes of travel and the costs/benefits of different modes of travel. Funded by NCC.

King's Lynn Transport Strategy – this is being reviewed and an updated transport strategy will be developed. (start year 2024/ongoing), NCC/BCKLWN.  
Working group meetings are underway. Funding secured.

## Air Quality Action Plan Long-list Options:

Category	Measure	Reason
<b>Alternative to Private Vehicle Use</b>	Bus based Park & Ride	Not taken forward as being proportional, due to no exceedances within both AQMAs
	Car & lift sharing schemes	Not taken forward as being proportional, due to no exceedances within both AQMA
	Car Clubs	Not taken forward as being proportional, due to no exceedances within both AQMA
	Rail based Park & Ride	Not taken forward as being proportional, due to no exceedances within both AQMA
	Other	Measure 1.4 build Active Travel Hub with bus stop into town
<b>Environmental Permits</b>	Introduction/increase of environment charges through permit systems and economic instruments	Source apportionment shows main source is from road transport
	Introduction/increase of environmental funding through permit systems and economic instruments	Source apportionment shows main source is from road transport
	Large Combustion Plant Permits and National Plans going beyond BAT	Source apportionment shows main source is from road transport
	Measures to reduce pollution through IPPC Permits going beyond BAT	Source apportionment shows main source is from road transport
	Other measure through permit systems and economic instruments	Source apportionment shows main source is from road transport
<b>Freight and Delivery Management</b>	Tradable permit system through permit systems and economic instruments	Source apportionment shows main source is from road transport
	Delivery and Service plans	Source apportionment shows main source is from cars and buses, not freight movements
	Freight Consolidation Centre	Source apportionment shows main source is from cars and buses, not freight movements
	Freight Partnerships for city centre deliveries	Source apportionment shows main source is from cars and buses, not freight movements
	Quiet & out of hours delivery	Source apportionment shows main source is from cars and



		buses, not freight movements
	Route Management Plans/ Strategic routing strategy for HGV's	Considered as part of planning applications see Measure 4.1
<b>Policy Guidance and Development Control</b>	Air Quality Planning and Policy Guidance	Follow DEFRA Guidance , use of screening tools, IAQM guidance and best practice. Consider as part of planning application inside or adjacent to each AQMA, see Measure 4.1
	Low Emissions Strategy	Not taken forward as being proportional, due to no exceedances within both AQMA
	Regional Groups Co-ordinating programmes to develop Area wide Strategies to reduce emissions and improve air quality	Measure 6.1 Air Quality Project being scoped with NCC Public Health
	Sustainable Procurement Guidance	N/A
<b>Promoting Low Emission Plant</b>	Emission control equipment for small and medium sized stationary combustion sources / replacement of combustion sources	Source apportionment shows main source is from road transport
	Low Emission Fuels for stationary and mobile sources in Public Procurement	Source apportionment shows main source is from road transport
	Other measure for low emission fuels for stationary and mobile sources	Source apportionment shows main source is from road transport
	Public Procurement of stationary combustion sources	Source apportionment shows main source is from road transport
	Regulations for fuel quality for low emission fuels for stationary and mobile sources	Source apportionment shows main source is from road transport
	Shift to installations using low emission fuels for stationary and mobile sources	Source apportionment shows main source is from road transport
<b>Promoting Low Emission Transport</b>	Company Vehicle Procurement - Prioritising uptake of low emission vehicles	Not taken forward as being proportional, due to no exceedances within both AQMA
	Low Emission Zone (LEZ) or Clean Air Zone (CAZ)	Not taken forward as being proportional, due to no exceedances within both AQMA
	Priority parking for LEV's	Not taken forward as being proportional, due to no exceedances within both AQMA
	Procuring alternative Refuelling infrastructure to promote Low Emission Vehicles, EV recharging, Gas fuel recharging	EV charging being taken forward Measure 3.3 Develop Car Parking Strategy

	Public Vehicle Procurement - Prioritising uptake of low emission vehicles	BCKLWN already have lease car policy for low emission vehicles, including Mayor's car.
	Taxi emission incentives	Measure already included in the licensing of taxis
	Taxi Licensing conditions	Conditions already included in adopted procedure
<b>Promoting Travel Alternatives</b>	Encourage / Facilitate homeworking	Taken forward Measure 1.3
	Intensive active travel campaign & infrastructure	Taken forward Measures 1.1, 1.2, 1.3 & 1.4
	Personalised Travel Planning	Taken forward Measures 1.1, 1.2, 1.3 & 1.4
	Promote use of rail and inland waterways	Taken forward Measure 1.6
	Promotion of cycling	Taken forward Measures 1.1,1.2,1.3,1.4,1.5
	Promotion of walking	Taken forward Measures 1.1,1.2,1.3,1.4,1.5
	School Travel Plans	Taken forward in Measure 1.1
	Workplace Travel Planning	Taken forward in Measure 1.2,1.3
<b>Public Information</b>	Via leaflets	Taken forward in Measures 5.1, 5.2
	Via other mechanisms	Taken forward in Measures 5.1, 5.2
	Via radio	Taken forward in Measures 5.1, 5.2
	Via television	Taken forward in Measures 5.1, 5.2
	Via the Internet	Taken forward in Measures 5.1, 5.2
<b>Traffic Management</b>	Anti-idling enforcement	Not taken forward as being proportional, due to no exceedances within both AQMA
	Emission based parking or permit charges	Not taken forward as being proportional, due to no exceedances within both AQMA
	Reduction of speed limits, 20mph zones	Not taken forward as being proportional, due to no exceedances within both AQMA
	Road User Charging (RUC) / Congestion charging	Not taken forward as being proportional, due to no exceedances within both AQMA
	Strategic highway improvements, re-prioritising road space away from cars, including Access management, Selective vehicle priority, bus priority, high vehicle occupancy lane	Taken forward in Measures 3.1,3.2,3.4,

	Testing Vehicle Emissions	Not taken forward as being proportional, due to no exceedances within both AQMA
	UTC, Congestion management, traffic reduction	Not taken forward as being proportional, due to no exceedances within both AQMA
	Workplace Parking Levy, Parking Enforcement on highway	Not taken forward as being proportional, due to no exceedances within both AQMA
<b>Transport Planning and Infrastructure</b>	Bus route improvements	Taken forward in Measure 2.1,2.2,3.1
	Cycle network	Taken forward in Measure 1.5
	Public cycle hire scheme	Not taken forward as being proportional, due to no exceedances within both AQMA
	Public transport improvements-interchanges stations and services	Previous upgrade to Bus station and Railway Station link, measure 1.4 on Active Travel Hub
<b>Vehicle Fleet Efficiency</b>	Driver training and ECO driving aids	Not taken forward as being proportional, due to no exceedances within both AQMA
	Fleet efficiency and recognition schemes	Not taken forward as being proportional, due to no exceedances within both AQMA
	Promoting Low Emission Public Transport	Not taken forward as being proportional, due to no exceedances within both AQMA
	Testing Vehicle Emissions	Not taken forward as being proportional, due to no exceedances within both AQMA
	Vehicle Retrofitting programmes	Not taken forward as being proportional, due to no exceedances within both AQMA

**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Environment and Community Panel		
DATE:			
TITLE:	Food Waste Collections – Maximising Collections		
TYPE OF REPORT:	Performance Update		
PORTFOLIO(S):	Cllr Sandra Squire		
REPORT AUTHOR:	Barry Brandford		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

**REPORT SUMMARY/COVER PAGE**

<b>PURPOSE OF REPORT/SUMMARY:</b>
To provide Members with an opportunity to consider the proposed actions on maximising the capture of food waste.
<b>KEY ISSUES:</b>
Proposed trial on increasing food waste capture through providing caddy liners in trial areas. Response to Government changes on commercial and other sources of food waste
<b>OPTIONS CONSIDERED:</b>
Do Nothing Implement a trial for a limited period of time to support residents in four collection round areas to understand the impact of providing free caddy liners on the amount of food waste collected. Implement a limited food waste collection service for some non household waste sources including schools with existing contracts for collections with the council. Implement a full service for all food waste collection service for all sources and negotiate this change with Serco. Determine not to provide a food waste collection service beyond domestic properties.
<b>RECOMMENDATIONS:</b>
The Panel is invited to consider the options presented and make any appropriate recommendations relating to the Officer Delegated Decision
<b>REASONS FOR RECOMMENDATIONS:</b>
To scrutinise recommendations being made for an officer delegated decision

Date of meeting:

## FOOD WASTE COLLECTIONS – MAXIMISING COLLECTIONS

### Summary

#### Recommendation

1. That a trial is undertaken to determine the impact of providing free food caddy liners across 4 collection rounds as set out in the report and the trial last for a period 6 months as a minimum.
2. Additional costs associated with any trial is met from the Food Waste Collection earmarked reserve.
3. The Waste and Recycling Manager in consultation with the Portfolio Holder for the Environment and Coastal is authorised to issue a Contract Change Notice making temporary changes to Schedules 2 and 6 of the Waste and Related Services Contract 2021 to provide greater flexibility in the delivery of food caddy liners.
4. The council will offer a food waste collection to schools, who have existing contracts for waste collections, in a manner to be determined by the Waste and Recycling Manager and the cost of the service shall be determined by the Assistant Director Operations and Commercial and the Assistant Director Finance in consultation with the Portfolio Holders for Environment & Coastal and Finance, if introduced before 31 March 2025.
5. The Waste and Recycling Manager in consultation with the Portfolio Holder for the Environment and Coastal is authorised to issue a Contract Change Notice making temporary changes to Schedules 2 and 6 of the Waste and Related Services Contract 2021 to provide the service.

#### Reason for Decision

To enable greater capture of food waste for recycling and implementing in a coherent manner the changes to the law on collection of food waste from non domestic properties.

### 1 Background

- 1.1. The Council commenced food waste collections in April 2013, with the provision of caddies to all households, through the years certain changes within the way customers could engage with the council and how food waste was processed meant that the council stopped providing caddy liners at cost. Caddy liners were not required so it was decided to move to the 'any bag will do' message. This is an environmentally sound message but the users of the service declined and tonnages captured reduced. Food waste collections had to be suspended during Covid 19. The relaunch of the service in July 2021 has limited success with a reduction of over 1,000 tonnes in captured waste.
- 1.2. Recent work in spring 2024 has shown that promotion and support with free caddy liners and leaflets, supporting active engagement and social media presence can increase food waste put out for recycling.

- 1.3. The cost of food waste processing will from October be reduced in cost by half or if tonnages increase become a small revenue stream.
- 1.4. The government just prior to the calling of the July 2024 General Election implemented changes in the law on food waste collections and recycling. This included collection of food waste from non-household municipal premises, except micro-firms, will be required to make arrangements for separate food waste collections and to present the waste in accordance with the legislation by 31 March 2025. Local authorities are obliged to make such collections on request. The legal change also applies to commercial waste producers, such as pubs and residential care homes and others who do catering activities.

## **2 Options Considered**

### **Trial of free food caddy liners**

#### No Change

- 2.1. The response to the challenges around the maximisation of food waste sent for recycling and the Corporate Strategy is to implement changes operational changes where these are shown to be effective. Therefore, it is determined that to do nothing is not accepted as an option.

#### Implement Trial of Food Caddy Liners

- 2.2 The council is at a point where the service for the treatment of food waste is being renewed with NEWS. If more food waste were collected the price charged for its processing would improve. This may equate to my positive impact of more than £40 per tonne.
- 2.3 Neighbouring authorities in Norfolk have a similar service but both have higher rates of food waste to capture. There a significant disparity between the councils.
- 2.4 The most significant difference between the service design for Norwich City Council & Broadland District Council compared to King's Lynn and West Norfolk Borough Council is the provision of caddy liners. The other councils in Norfolk supply caddy liners on request this is achieved by the resident requesting liners by tying a single liner to the handle of the kerbside caddy. This key difference is supported by wrap reference Food Waste Collection Trials – use of liners for kerbside containers and kitchen caddies. WRAP Study 2009.
- 2.5 The impact of providing food caddy liners is expected to be an increase in food waste collected with a potential of at least 1200 tonnes per annum. This is the same level of capture as in 2013 when

the service was first launched. It should be noted that recycling credits are payable for food waste collected.

- 2.6 The costs of Serco delivering caddies to homes in the trail area has been agreed at £120 per week, where four rounds are used in the trial. The Waste and Recycling Manager is delegated to make such minor changes in the Scheme of Delegation.
- 2.7 To determine if the research is valid in the provision of caddy liners and support for householders will increase the capture of food waste it is proposed that a trial is established for the remainder of the current financial year. For the purposes of a trial areas need to be identified. The delivery of change is most appropriately targeted at places where positive behaviours are most likely to be seen. The demographic which is most likely to be to respond to encouragement to recycle more food waste are those homeowners with children with enough commitment and capacity to prepare food from fresh and to recycle any food waste. The following potential are Areas for potential selection

Reffley Lane area King's Lynn  
Beech Road / Willow Road Nelson Ave / Broadlands area  
Downham Market  
Docking and Methwold.

- 2.8 The areas selected are based upon being Acorn 3 predominant post codes and served by an identifiable collection round. All parts of a collection round will be included even if a post code area is not predominantly Acorn 3. Monitoring data will be collected for the purposes determining outcomes based on weight of food waste collected before and during the trial. This can be reported quarterly in arrears.

### **Response to change in the law**

- 2.9 The council has a legal duty to provide from April 2025 to provide food waste collections to businesses and non domestic premises which are similar to households in the form of the waste they create.
- 2.10 The implementation of the service across all of the potential sources of food waste is complex and will require an agreement with Serco on a new cost structure. Serco due to their claim of a loss making contract may make claims for both capital and revenue which are potentially designed to improve their position but are difficult to fully resist. The ability to have vehicles procured and delivered on time for April 2025 is extremely challenging, particularly after any negotiation has been completed.
- 2.11 Therefore, it is not considered reasonable to not provide the full range of services as a pragmatic response whilst contract changes, vehicles and bins are resolved.

- 2.12 The council through Serco provide waste services to a number of schools across the area of the borough and use predominantly the same collection vehicles as collect from the adjacent houses. Schools are always in a locality where there are homes that receive a food waste collection service. The cost of providing the service should be readily capable being agreed with Serco. The cost should be similar to costs already exhibited in the contract. Schools often have the type of accessibility that provides a safe means of access to food waste bins.
- 2.13 The risk of not providing a pragmatic response to universal food waste collections could be a challenge, reputational damage and an adverse determination by the Environment Agency.

### 3 Policy Implications

- 3.1 The policy of the council remains to consider environmental issues in all we do and by encouraging residents and businesses to do the same. Through the effective management of the Serco Waste and Related Services Contract we will provide value for money through efficient and effective service delivery.
- 3.2 The pragmatic approach to providing food waste to non domestic premises minimising additional emissions in collections and keeping costs adequately controlled meets the Corporate Strategy.

### 4 Financial Implications

- 4.1 The Council has set aside earmarked reserve allows for this project to be funded across the current year and deal with uncertainty.
- 4.2 There are existing budgets for the processing of food waste and the ongoing delivering caddy liners after the initial roll out.
- 4.3 All forecast numbers are additional income and expenditure and assumes that only half of the food waste collected is from new participants.

#### 4.4 Cost forecasts are

Caddy liners	£3,200
Caddy liner delivery	£3,600
Food waste processing	£2,350
Communications	£3,600
<b>Total</b>	<b>£12,750</b>

#### Income forecasts are

Recycling Credits	£4,800
<b>Total</b>	<b>£4,800</b>



- 4.4 If the same process were applied across the whole of the borough on the same base assumptions it is expected that a budget saving would be created.

## **5 Personnel Implications**

- 5.1 There are no personnel implications.

## **6 Environmental Considerations**

- 6.1 The proposal is intended to increase the amount of food waste collected across the Borough. This will also have environmental benefits. The use of bio degradable caddy liners avoids plastic pollution of the environment.

## **7 Statutory Considerations**

- 7.1 The Environment Act 2021 as currently enacted requires at Section 57 and by amending Section 45 of the Environmental Protection Act 1990 that food waste collections are provided, subject to minimal exemptions, to all domestic properties, non household and commercial premises requesting the service. Non domestic premises producing food waste, similar to domestic waste producers, ie pubs and catering establishments, must separate and arrange separate collections of food waste.
- 7.2 The council is an enforcing authority our approach will be pragmatic and advisory until we are content that services are available which match the businesses needs.

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

See attached

**Pre-Screening Equality Impact Assessment**

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



Name of policy/service/function	Refuse and Recycling				
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	Collection and recycling of food waste				
<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><u>Free caddy liner provision is positive as avoids costs for low income households</u></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
<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?	No	
<b>3.</b> Could this policy/service be perceived as impacting on communities differently?	No	
<b>4.</b> Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No	
<b>5.</b> Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?  If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	Yes / No	<b>Actions:</b>
		<b>Actions agreed by EWG member:</b> .....
<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>                          <b>Decision agreed by EWG member: .....</b>		
<b>Assessment completed by:</b>		
<b>Name</b>	Barry Brandford	
<b>Job title</b>	Waste and Recycling Manager	
<b>Date</b>	28/06/2024	

**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Environment and Community Panel		
DATE:	3 <sup>rd</sup> September 2024		
TITLE:	LAHF Round 3		
TYPE OF REPORT:	Cabinet Report		
PORTFOLIO(S):	People and Communities		
REPORT AUTHOR:	Nikki Patton, Housing Services Manager		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	Yes

**REPORT SUMMARY/COVER PAGE**

<b>PURPOSE OF REPORT/SUMMARY:</b>
Information on the funding offered to the BCKLWN through LAHF Round 3.
<b>KEY ISSUES:</b>
Members are directed to the attached report for full details of the key issues.
<b>OPTIONS CONSIDERED:</b>
Members are directed to the attached report for full details of the options.
<b>RECOMMENDATIONS:</b>
To consider the report and make any appropriate recommendations to Cabinet.
<b>REASONS FOR RECOMMENDATIONS:</b>
To scrutinise recommendations being made for an executive decision.

**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
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					

Date of meeting: 17th September 2024

**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 Council's borrowing costs until full payment is made.

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

## **7. Personnel Implications**

8. None

## **9. Environmental Considerations**

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

## **10. Statutory Considerations**

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

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

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

## **12. Risk Management Implications**

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

12.1.1 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.

10.2 The following are associated risks of not taking the funding

12.1.2 Risk of losing opportunity to add to affordable housing stock

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

12.1.4 Risk of not meeting wider housing and homelessness pressures

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

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

**14. Declarations of Interest / Dispensations Granted**

15. Duncan Hall - Director of West Norfolk Housing Company

**16. Background Papers**

17. Appendix 1 - Draft Memorandum of Understanding

18. Appendix 2 - Prospectus for Local Authority Housing Fund Round 3

**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	<p>The delivery of 4 homes through the fund for eligible Afghan households could be seen as favoring these households over established local communities.</p>
<p><b>3.</b> Could this policy/service be perceived as impacting on communities differently?</p>	Yes	<p>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>
<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>	<p><b>Karl Patterson</b></p>	
<p><b>Job title</b></p>	<p><b>Housing Development Manager</b></p>	
<p><b>Date</b></p>	<p><b>22<sup>nd</sup> August 2024</b></p>	



## ENVIRONMENT AND COMMUNITY PANEL WORK PROGRAMME 2024/2025

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER/ ATTENDEE	OBJECTIVES AND DESIRED OUTCOMES
<b>4<sup>th</sup> June 2024</b>	Membership of Task Groups and Informal Working Groups 2024/2025	Operational	Democratic Services Officer	To appoint Members to Task Groups and Informal Working Groups established by the Panel
	Nominations to Outside Bodies and Partnerships	Operational	Democratic Services Officer	To nominate representatives to outside bodies and partnerships
	Appointment of Vice Chair for the Municipal Year	Operational		
	Councillor Community Grants		Debbie Ess/ Honor Howell	For information
	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			
<b>16<sup>th</sup> July 2024</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			
	Cabinet Report – Alive West Norfolk Arrangements	Cabinet Report		After Joint Panel and prior to Cabinet on 30 <sup>th</sup> July 2024
	Homelessness and Rough Sleeping Strategy	Cabinet Report	Andy King	Update, recommendations before going to Cabinet on 17 <sup>th</sup> September 2024
<b>3<sup>rd</sup> September 2024</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			
	Wash East Coast Management Strategy – Unit C – Technical Report		Dave Robson	To address the Notice of Motion on Coastal Management referred to

117

				the Panel from Full Council in October 2023.
	Air Quality Action Plan	Cabinet Report	Dave Robson	Going to Cabinet on 17 <sup>th</sup> September 2024
	Food Waste Collection- Maximising Collection	Cabinet Report	Barry Branford	Going to Cabinet on 17 <sup>th</sup> September 2024
	LAHF Round 3	Cabinet Report	Nikki Patton/ Duncan Hall	Going to Cabinet on 17 <sup>th</sup> September 2024
<b>8<sup>th</sup> October 2024</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			
	Disabled Facilities Grant Framework	Cabinet Report	Jo Russell Ryan Wilson Mark Whitmore	Before going to Cabinet on 5 <sup>th</sup> November 2024
	Gambling Act Policy	Cabinet Report	Marie Malt	Policy Review, before going to cabinet on 5 <sup>th</sup> December 2024
	King's Lynn Town Football Club	Cabinet Report	Matthew Henry	Before going to Cabinet on 5 <sup>th</sup> November 2024
	Recommendations from the Biodiversity Task Group	Cabinet Report	Stuart Ashworth	To consider the report and make any appropriate recommendations to Cabinet
<b>26<sup>th</sup> November 2024</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			
	Notice of Motion – Dentistry			
<b>8<sup>th</sup> January 2025</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			
<b>25<sup>th</sup> February 2025</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			

<b>8<sup>th</sup> April 2025</b>	Any Cabinet Reports which fall within the remit of the Panel – to be confirmed.			

**To be scheduled**

- Gayton Road Cemetery – to come back once alternative locations had been identified.
- Policy Development – Review of Tree and Woodland Strategy and update from the Arboricultural Officers
- Service Level Agreement for Council Approved testing Stations
- Informal Working Group – Wash Barrier
- Elder Abuse and the Right of Care Home Residents
- Climate Change Informal Working 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

<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		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
	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>
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)
121	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)
122	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

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)

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**

	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
124	Overnight Campervan parking in Hunstanton	Non	Cabinet	Leader Asst Director – M Chisholm		Public
	Pay Award 2024	Key	Cabinet	Leader		Public