

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



Cabinet

Agenda

Tuesday, 9th June, 2026
at 6.00 pm

in the Council Chamber, Town Hall, Saturday
Market Place, King's Lynn 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
Fax: 01553 691663

CABINET AGENDA

DATE: CABINET - TUESDAY, 9TH JUNE, 2026

VENUE: TOWN HALL, SATURDAY MARKET PLACE,
KING'S LYNN

TIME: 6.00 pm

As required by Regulations 5 (4) and (5) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 - Item 18 below will be considered in private.

Should you wish to make any representations in relation to the meeting being held in private for the consideration of the above item, you should contact democratic.services@west-norfolk.gov.uk

1. **APOLOGIES**

To receive apologies for absence.

2. **MINUTES** (Pages 5 - 15)

To approve the Minutes of the Meeting held on 23rd April 2026 (attached).

3. **URGENT BUSINESS**

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

4. **DECLARATIONS OF INTEREST** (Page 16)

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

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

5. CHAIR'S CORRESPONDENCE

To receive any Chair's correspondence.

6. MEMBERS PRESENT UNDER STANDING ORDER 34

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

Members should inform Democratic Services and the Chair by 12 noon on the day of the meeting of their intention to speak under Standing Order 34, specifying which items they wish to speak on.

7. CALLED IN MATTERS

To report on any Cabinet Decisions called in.

8. SIGNING OF THE SCRUTINY AND EXECUTIVE PROTOCOL (Pages 17 - 19)

The Leader to sign the previously agreed Scrutiny and the Executive Protocol (attached).

9. FORWARD DECISIONS (Pages 20 - 29)

To comment on and note the Forward Decisions List.

10. MATTERS REFERRED TO CABINET FROM OTHER BODIES

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

11. HEALTH AND SAFETY POLICY AND STATEMENT OF INTENT (Pages 30 - 48)

12. DATA PROTECTION POLICY (Pages 49 - 93)

13. WEST NORFOLK ECONOMIC STRATEGY AND ACTION PLAN (Pages 94 - 162)

14. KING'S LYNN AND WEST NORFOLK NEW LOCAL PLAN - GOVERNANCE ARRANGEMENTS FOR THE PLAN MAKING PROCESS (Pages 163 - 193)

15. APPOINTMENTS TO CABINET SUB COMMITTEES AND TASK GROUPS AND CREATION OF NEW CABINET TASK GROUP (Pages 194 - 203)

16. **DISPOSAL OF LAND AT HUNSTANTON** (Pages 204 - 210)

17. **EXCLUSION OF THE PRESS AND PUBLIC**

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

PRIVATE ITEM

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

18. **EXEMPT - DISPOSAL OF LAND AT HUNSTANTON EXEMPT APPENDIX**
(Pages 211 - 212)

To: Members of the Cabinet

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

For Further information, please contact democratic.services@west-norfolk.gov.uk :

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK

CABINET

**Minutes from the Meeting of the Cabinet held on Thursday, 23rd April, 2026
at 6.00 pm in the Council Chamber, Town Hall, Saturday Market Place,
King's Lynn PE30 5DQ**

PRESENT: Councillors Beales (Chair), de Whalley, Lintern, Moriarty, Morley,
Ring (Vice Chair) and Rust.

PRESENT UNDER STANDING ORDER 34: Councillors Kemp and Ryves.

OFFICERS:

Kate Blakemore – Chief Executive
Emma Hodds – Chief of Staff and Monitoring Officer
Stuart Ashworth – Assistant Director – Planning
Siobhan Cleeve – Assistant Director – Leisure
Ged Greaves – Climate Change Manager
Carl Holland – Assistant Director - Finance
Jeannette Hollingsworth – Environmental Health Manager
Dave Robson – Environmental Health Manager
Mark Whitmore – Assistant Director – Health, Wellbeing and Public Protection

CAB141 APOLOGIES

An apology for absence was received from Councillor Squire.

CAB142 MINUTES

RESOLVED: The minutes from the meeting held on 3rd March 2026 were agreed as a correct record.

CAB143 URGENT BUSINESS

None.

CAB144 DECLARATIONS OF INTEREST

None.

CAB145 CHAIR'S CORRESPONDENCE

None.

CAB146 MEMBERS PRESENT UNDER STANDING ORDER 34

Councillor Kemp – South Lynn Community Centre
 Councillor Ryves – Invited to the meeting for the Audit Committee
 Annual Report from the Chair.

CAB147 **CALLED IN MATTERS**

None.

CAB148 **FORWARD DECISIONS**

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Councillor Moriarty reported that a report on cost recovery for invalid planning applications would be brought through the decision making process later in the year.

Cabinet were informed that Members would be updated regularly via briefings, Cabinet Reports and Scrutiny Panel reports on Local Government Reorganisation Readiness as required.

RESOLVED: The Forward Decisions List was noted.

CAB149 **MATTERS REFERRED TO CABINET FROM OTHER BODIES**

Cabinet noted the recommendations put forward by the Panels in relation to the following items:

Environment and Community Panel – 14th April 2026

Climate Change Strategy and Action Plan.
 Railway Road Extended Air Quality Management Area Revocation.
 Changes to the existing Corporate Enforcement Policy and Financial Penalties as a result of the Renters Rights Act
 South Lynn Community Centre.

Corporate Performance Panel – 15th April 2026

Quarter 3 Budget Monitoring

Regeneration and Development Panel – 31st March 2026

Changes to the Local Plan Task Group Terms of Reference
 High Street Rental Auctions
 Custom House Refurbishment

CAB150 **AUDIT COMMITTEE ANNUAL REPORT FROM THE CHAIR**

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

The Assistant Director presented the report and outlined the remit and work of the Audit Committee, including the requirement for the Committee to undertake a self-assessment and to report annually to Council on its activities. He provided an overview of the Committee's role, which included monitoring the implementation of Internal Audit recommendations, supporting the preparation of the Annual Governance Statement, and undertaking ongoing Member training.

Councillor Ryves, Chair of the Audit Committee, addressed Cabinet and highlighted the Committee's key achievements which included contributing to the development and oversight of the Corporate Risk Register, monitoring Key Performance Indicators, and considering Internal Audit reports and overseeing the implementation of resulting recommendations. Councillor Ryves referred to the Annual Governance Statement and explained that the Committee had worked to make this more 'forward looking' and easier to understand.

Councillor Rust was pleased to hear of the improvements that had been made to make documents easier to understand.

Councillor Ryves thanked all of the officers involved in the Audit Committee.

The Chair thanked the Audit Committee and the Chief Executive for the increased monitoring of Internal Audit recommendations.

Councillor Lintern commented she was pleased to see compliance with policies.

In response to questions from the Chair, it was explained that the recruitment of two Independent Members to sit on the Audit Committee was imminent and remuneration had been benchmarked and would be a set rate per Committee meeting.

RECOMMENDED: That the Annual report of the Chair of Audit Committee be considered and noted by Full Council.

REASON FOR DECISION: It is recommended practice for the Audit Committee to report on its work. To comply with best practice in making the best efforts by the Audit Committee to adopt the principles in complying with CIPFA's "Position Statement: Audit Committee in Local Authorities".

CAB151 **CHANGES TO THE LOCAL PLAN TASK GROUP TERMS OF REFERENCE**

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

Cabinet noted that the Regeneration and Development Panel had considered this report and supported the Cabinet Recommendations.

Councillor Moriarty presented the report outlining the requirements and timescale for the new Local Plan. Cabinet were informed that the Local Plan Task Group and Planning Committee had been briefed on this process and an all Member briefing session would be arranged. Councillor Moriarty thanked the officers involved in the Local Plan creation, highlighting the considerable amount of work ahead.

Councillor Lintern highlighted the need for Parish Councils to be kept informed; it was confirmed that briefings would be arranged. Councillor Moriarty explained that this report presented the revised Terms of Reference for the Task Group, which was in effect the first part of the process, with lots of work to follow.

Councillor Ryves addressed Cabinet under Standing Order 34 and drew attention to the implications of Local Government Reorganisation. The Leader explained that responsibility for progressing the Local Plan would transfer to the Unitary Authority on vesting day and that work needed to be advanced in preparation for this transition, noting that progression of the Local Plan was a statutory requirement. Councillor Moriarty commented that the Terms of Reference of the Local Plan Task Group had been designed to be sufficiently agile to enable preparation for Local Government Reorganisation.

RESOLVED: To adopt the revised Local Plan Task Group Terms of Reference (Annex 1 to this report).

REASON FOR DECISION: To recognise the requirements and statutory obligations of the new planning system, as introduced through the 2023 Levelling-Up and Regeneration, and 2025 Planning and Infrastructure Acts.

CAB152 **CLIMATE CHANGE STRATEGY AND ACTION PLAN**

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

Cabinet noted that the Environment and Community Panel had considered the report and supported the recommendations to Cabinet

Councillor de Whalley presented Cabinet with information on daily see surface temperatures, global warming and the climate change emergency.

The Climate Change Manager set out the background to the development of the Strategy and highlighted the work that had been undertaken to address carbon emissions both as an organisation and in the Council's community leadership role in reducing the Borough's

carbon footprint. He also drew attention to section 5 of the draft Strategy, which detailed the activities undertaken to date.

Councillor Rust welcomed the links with the Marmot responsibilities and the positive impact it would have on disadvantaged communities.

Councillor Morley requested more detail on the budget and finances and it was confirmed that a number of projects had been funded and launched already, some projects were already included in the Capital Programme and those that were not already funded would utilise the remaining Climate Change reserve fund. External funding opportunities and opportunities to lever in additional funding would also be looked at.

Cabinet were informed that regular updates would also be provided to the Environment and Community Panel.

Councillor de Whalley commented that many of the projects represented a “spend to save” approach and emphasised the importance of also recognising the social value generated by such initiatives.

Councillor Beales referred to exemplar projects delivered by the Council, including approaches to energy efficiency that would be considered at the Guildhall and within the Council’s Major Housing Programme.

Councillor Ring highlighted the associated health and wellbeing benefits and referred to households that remained reliant on heating oil. He also commented on the quality of infrastructure being incorporated into the Council’s housing developments.

Councillor Rust referred to fuel poverty and that there was a crisis resilience fund available that residents could apply for. Councillor Ring commented that this was not just limited to those in receipt of certain benefits, it was available to anyone who earned up to a certain income.

Councillor de Whalley commented that the Beat your Bills Roadshows would continue to help residents seek efficiencies and signpost to grant funding opportunities.

Councillor Beales suggested that the Finance Portfolio Holder work with the Climate Change Team regarding reporting of finances, as required.

Councillor Beales referred to the show house at Florence Fields, which showcased the efficiencies and high quality of the Councils housing developments.

RESOLVED: That Cabinet approve the Climate Change Strategy and Action Plan.

REASON FOR DECISION: To ensure there is a comprehensive and up to date framework for the Council's response to climate change.

CAB153 **RAILWAY ROAD EXTENDED AIR QUALITY MANAGEMENT AREA REVOCATION**

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

Cabinet noted that the Environment and Community Panel had considered this report and supported the recommendations to Cabinet.

Councillor de Whalley presented the report and highlighted the improvements that had been made to Air Quality in the area and the objectives that had been met, which was good news for residents. He referred to links with Marmot and the Air Quality Strategy and confirmed that Air Quality Monitoring would continue.

The Environmental Health Manager confirmed that the area had been six years compliant and levels were continuing to fall.

Cabinet welcomed this report and the positive news.

RESOLVED: Revoke Railway Road Air Quality Management Area and revoke Railway Road Extended Air Quality Management Area.

REASON FOR DECISION: Air quality levels of nitrogen dioxide (NO₂) have steadily fallen over the last few years and have not exceeded the legal air quality annual mean limit for the last 5 years within the AQMA. If there have been no exceedances over the previous 5 years, then there is no longer a need to have AQMAs in place.

CAB154 **QUARTER 3 BUDGET MONITORING**

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

Cabinet noted that the Corporate Performance Panel had considered this report and supported the recommendations to Cabinet.

Councillor Morley presented the report and outlined the savings that had been achieved and transferred to the General Reserve. He thanked officers for their due diligence and commended their work over the past two years.

Councillor Morley also outlined proposals to work in partnership with Norfolk County Council and the Fire and Rescue Service to take forward an assessment for a potential training school.

The Assistant Director reported on the favourable revenue outturn position and the current position of the Capital Programme.

Councillor Rust congratulated all those involved in the successful renegotiation of loans.

Councillor Beales congratulated the Portfolio Holder and officers on the budget-setting process. He informed Cabinet of his intention to establish a Group to review budget processes, the Community Fund announced as part of the Budget, and the process for submitting budget amendments, in preparation for the next budget-setting cycle.

RESOLVED: That Cabinet:

1. Note the forecast outturn for Revenue and Capital monitoring position as at 31st December 2025 for 2025/2026.
2. Agree to update the Capital Programme as set out in section 3 of the report.

REASON FOR DECISION: To keep Cabinet informed of performance against budget for Capital and Revenue 2025/2026 based on Quarter 3 data.

CAB155 **CHANGES TO THE EXISTING CORPORATE ENFORCEMENT POLICY AND FINANCIAL PENALTIES AS A RESULT OF THE RENTERS RIGHTS ACT 2025**

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

Cabinet noted that the Environment and Community Panel had considered this report and supported the recommendations to Cabinet.

Councillor Rust presented the report, which set out the necessary changes required to ensure compliance with new legislation and to achieve national consistency through the adoption of a template policy. It was noted that the policy was being used as an exemplar and had been adopted by many local authorities.

The Environmental Health Manager explained that the legislation was highly prescriptive, which made the required processes clear for officers to follow and enabled the Council to effectively discharge its statutory duties.

Councillor Beales commented that the approach reflected the work of the West Norfolk Housing Company, particularly in relation to the provision of longer-term tenancies.

RESOLVED: That in order to ensure that the council has a robust legally compliant, and consistent approach to enforcement under the Renters' Rights Act, that Cabinet approve:

- 1) The inclusion of an addendum to the current Corporate Enforcement Policy.
- 2) The proposed Civil Penalty Policy.

REASON FOR DECISION: The Renters Rights Act 2025 has significantly changed the landscape for the private rented sector and introduced specific duties on Local Housing Authorities with respect to enforcement protocols and mandatory reporting of enforcement interventions into central government.

CAB156 **HIGH STREET RENTAL AUCTIONS**

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

Cabinet noted that the Regeneration and Development Panel had considered this report and supported the proposal.

Councillor Ring presented the proposal, which sought to bring vacant units at the southern end of King's Lynn High Street back into use. He provided information on national average vacancy rates and advised that there was currently eight vacant units within the designated area, excluding larger units. Councillor Ring outlined the process to be followed and noted that the proposal crossed into Councillor Rust's Portfolio, as delivery would be undertaken by the Empty Homes Officer.

Councillor Rust commented that the proposal was a good example of a collaborative approach and emphasised the importance of bringing vacant units back into productive use.

Councillor Beales commented that the proposal would be funded through Council Tax Second Homes funding and welcomed that the funding would be reinvested locally.

Councillor Moriarty asked whether there was discretion in relation to the type of shop operation. In response, the Assistant Director explained that there was criteria requiring the use to be of benefit to the local community and society. It was also noted that leases would be for a term of between one and five years.

Councillor Lintern asked whether the scheme could be extended to Downham Market and Hunstanton if successful. Councillor Ring responded that this could be considered if a further area was designated, noting that the initial scheme focused on a limited area due to the resource-intensive nature of the work.

RESOLVED: Cabinet to note the content of this report and agree to implement a High Street Rental Auction Scheme subject to following

the national guidance in implementing such a scheme, to initially be applied to the southern section of King's Lynn High Street.

REASON FOR DECISION: The scheme is needed to address the high concentration of long-term vacant commercial units on the southern High Street, which currently undermines the area's economic vitality, appearance and safety.

A High Street Rental Auction Scheme provides a practical tool to bring empty properties back into use and supports the wider aims of revitalising King's Lynn town centre.

CAB157 **SOUTH LYNN COMMUNITY CENTRE**

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

Cabinet noted that the Environment and Community Panel had considered the proposal and supported the Cabinet Recommendation.

Councillor Ring presented the report and provided background on the work of the Purfleet Pantry, explaining that the proposal would enable the organisation to continue its operations from premises that were significantly more suitable for its needs.

Councillor Kemp addressed Cabinet under Standing Order 34 in support of the proposal. She outlined the importance of the Purfleet Pantry as a valued asset to the local community and thanked all those involved for ensuring its continued operation. She noted that the new premises were more accessible, in better condition, and benefitted from onsite car parking. She also welcomed that Headway had secured more appropriate premises from which to operate.

Councillor Morley requested that a quantitative analysis of the benefits arising from the move be undertaken, in order to codify the improvements and capture the associated social value.

Councillor Lintern congratulated all those involved in ensuring that the new arrangements worked effectively for all parties.

Councillor Ring also referred to the private investment at St James, which would contribute to the creation of a hub delivering wider community benefits.

Councillor Beales commented that the proposal represented a positive outcome and delivered social value.

RESOLVED: To approve that the Purfleet Trust be provided with a lease for the South Lynn Community Centre.

REASON FOR DECISION: Leasing the South Lynn Community Centre to the Purfleet Trust will secure the use of the building for community benefit, and by doing so will support a trusted local organisation in delivering vital services and enabling this to expand.

The proposal aligns with the Councils strategic priorities in relation to the regeneration of the Southgates area and in supporting vulnerable residents, strengthening local partnerships and ensuring efficient use of public assets which align with the Pride in Place programme and the Marmot principles.

CAB158 **CUSTOM HOUSE REFURBISHMENT**

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

Cabinet noted that the Regeneration and Development Panel had considered this report and supported the recommendations to Cabinet.

Councillor Ring presented the report and provided information on the tenancy arrangements and the importance of opening the building for wider public use. He explained that the works would include the installation of a lift and a substantial, sensitively delivered refurbishment of the building.

The proposal before Members was to approve the letting of the contract for refurbishment, and Councillor Ring outlined the tender and procurement process. It was reported that the final tender was expected to be awarded in mid-May, with works anticipated to commence in July 2026 and completion scheduled for July 2027.

Councillor Beales thanked the Neighbourhood Board for the significant funding and support provided to enable the refurbishment to be taken forward.

Cabinet agreed to move into closed session in order to consider the exempt elements of the report.

CAB159 **EXCLUSION OF PRESS AND PUBLIC**

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

RESOLVED: That under Section 100(A)(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraphs 1, 2 or 3 of Part 1 of Schedule 12A to the Act.

CAB160 **EXEMPT - CUSTOM HOUSE**

Cabinet discussed the exempt elements of the report. Councillor Ring thanked officers for their involvement in bringing this forward.

RESOLVED:

1. To proceed with the Custom House element of the Riverfront Regeneration project based on the RIBA Stage 4 design.
2. Delegate authority to the Assistant Director for Regeneration, Housing and Place to award the contract to deliver the Custom House Project (“the Main Contract”) to the successful tenderer, as identified through the completed procurement process within the approved budget as authorised.
3. Delegate authority to the Assistant Director for Regeneration, Housing and Place in consultation with the Portfolio Holder to approve material changes to the scope of the project and/or variations to the Main Contract that are within the approved budget and in accordance with the Local Assurance Framework for this project.

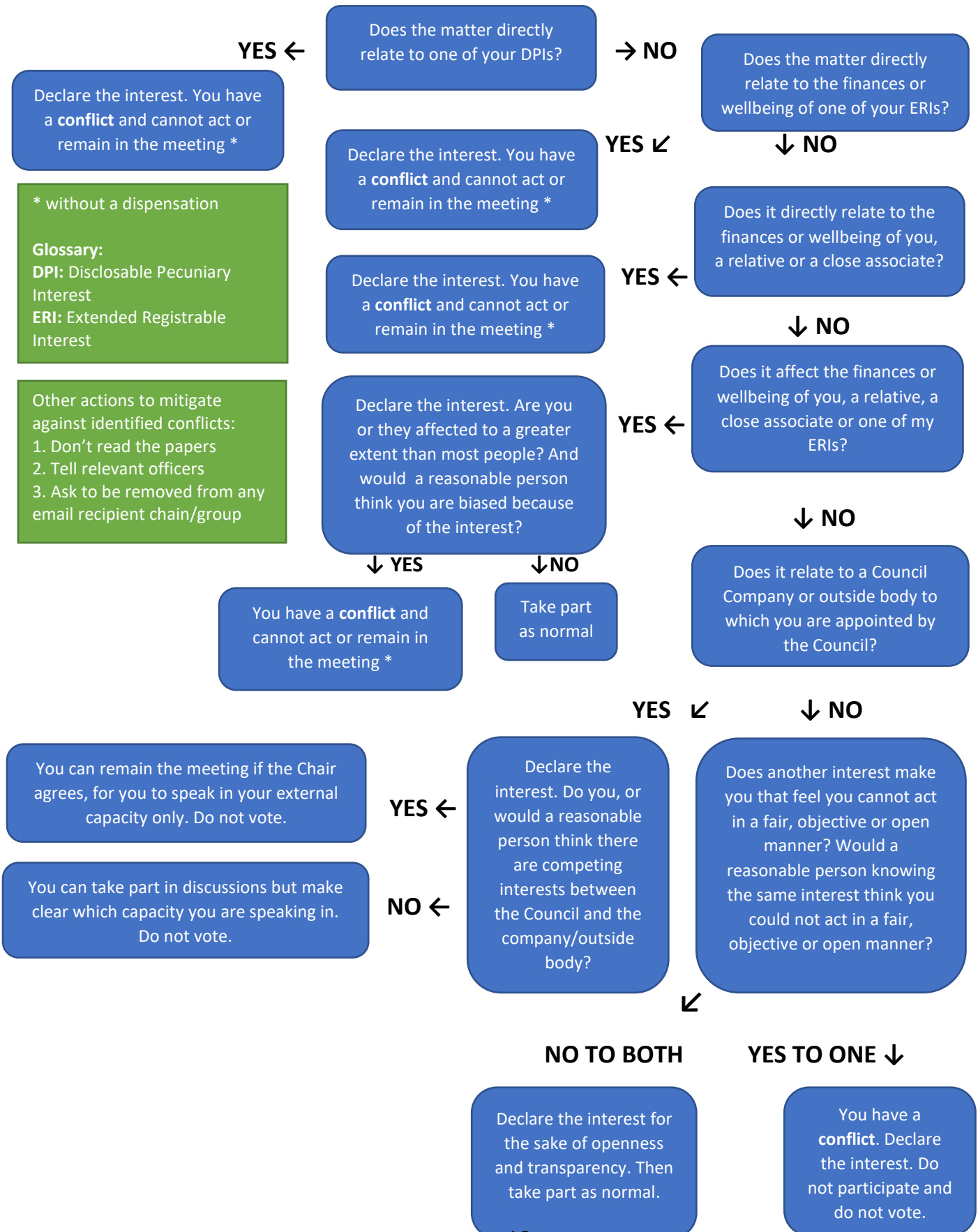
REASON FOR DECISION: To approve the letting of the contract for Custom House works, which will allow the works to be completed in line with Towns Fund timescales and support the Council’s corporate strategy policy to promote growth & prosperity.

The meeting closed at 8.02 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

Scrutiny and the Executive Protocol

Borough Council of
King's Lynn &
West Norfolk



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1. Terminology

Scrutiny is shorthand for 'Overview & Scrutiny' which was a legislative function and concept first introduced by the Local Government Act 2000. Under the Council's Constitution, Scrutiny is undertaken by the Policy Review and Development Panels.

Executive means the Cabinet, as the Council adopts the strong Leader and Cabinet model of governance.

2. Background

The Local Government Act 2000 introduced new models of governance for local authorities that moved away from the Committee structure, in which there is a **separation of decision-making** and **scrutiny** of those decisions.

The objective of the Leader and Cabinet governance model is to deliver greater efficiency, transparency and accountability of local authorities. The model is intended to ensure that decisions can be taken more quickly and efficiently than in the committee system, that the individuals or bodies responsible for decision-making can be more readily identified by the public and that those decision-makers can be held to account in public by overview and scrutiny committees.

The Executive is charged with **implementing** the agreed budget and policy framework. Overview and Scrutiny committees are charged with **holding the Executive accountable for that implementation**. The Act also envisages that Overview & Scrutiny Committees **advise** the Executive and Council **on policy development**.

Scrutiny is the counterweight to the Cabinet model of governance.

3. Purpose of the Protocol

This Protocol sets out the expectations on how the Council's Policy Review and Development Panels and Cabinet interact to enable the Panels to carry out an effective Scrutiny function.

The Protocol aims to establish a positive framework to enable the Panels to work effectively. It aims to promote and maintain an ethos of mutual respect, trust and courtesy between Panel Members, the Executive and officers and encourage constructive challenge.

4. Scrutiny's Functions

The Terms of Reference for each Policy Review and Development Panel are set out in Part of the Constitution, which sets out the Terms of Reference for the primary Council's Bodies.

Scrutiny is not decision-making. The core headline statutory functions of Scrutiny are as follows:

Function	What this looks like
Accountability	Holding the Executive to account for decisions, performance and use of resources.
Constructive challenge	Acting as a 'critical friend' to improve decisions and policies
Policy development	Contributing early to shape strategy and priorities.
Performance oversight	Monitoring how well services and partnerships deliver for residents
Community voice	Bringing residents' perspectives and evidence into decision-making
Transparency and learning	Ensuring decisions and outcomes are open to examination and improvement

5. Holding the Executive to Account

Should look like:

- Providing a "critical friend" challenge
- Analysing evidence against proposals for improvement
- Formulating clear, concise, evidence-based recommendations which have been subject to feasibility considerations
- Identification of areas for improvement, methods for measuring the impact of improvements and realistic timeframes for implementation and feedback
- Questions and challenge should be relevant, proportionate and appropriate
- Challenge should be focused on strategic matters that add value and impact
- Working with the Executive to develop Council policies
- Where possible, identifying and raising in advance specific requests for further information or other evidence required for the Panel's functions
- Working collaboratively to achieve the best outcome for residents
- An atmosphere of openness and climate of mutual respect and trust between all participants.

Should not look like:

- Confrontation
- Challenging individuals or personalities
- Party politics
- Conducting a witch hunt
- Rubber stamping Cabinet decisions
- Championing a personal agenda

6. The Executive Role in the Scrutiny Process

- Portfolio Holders are invited to attend any Scrutiny meeting where a decision or proposed decision falling in their Portfolio is to be scrutinised, including via the call-in process. In their absence they should arrange for the Leader, Deputy Leader or another Portfolio Holder to attend in their place.
- Portfolio Holders are to be questioned and held accountable for their decision or proposed decision.
- Portfolio Holders should be prepared to:
 - present their report to the Panel;
 - provide justification for the recommendation, proposal or decision;
 - answer questions posed by Panel Members with regards to political matters underpinning the decision made or proposed.
 - answer questions on the rationale and policy objectives which resulted in the proposal/decision.
- Officers will be present to answer questions posed by the Panel Members concerning technical issues underpinning the report/decision.
- Cabinet and the Corporate Leadership Team will be consulted with by the Policy Review and Development Panels regarding the content of the Annual Work Programme for each Panel, to be agreed at the first meeting of the Municipal year by each Panel.
- Cabinet will invite the Panel Chair, or a representative from the Panel, to attend the Cabinet meeting where recommendation from the Panel is being considered. They can attend the meeting to speak on the item and present the recommendations from the Panels, this is especially important if the Panels have made counter recommendations for Cabinet's consideration.

Signed May 2026:

Leader of the Council.....

Chair of the Corporate Performance Panel.....

Chair of the Environment and Community Panel.....

Chair of the Regeneration and Development Panel.....



Forward Decisions List

The Forward Decision List outlines the Cabinet's upcoming decisions over the next few months. It specifies which decisions are considered significant and indicates those that may lead to portions of the meeting being conducted in private. In addition, the list highlights the responsible Lead Officer and Portfolio Holder.

This document will be updated and republished on the Council's website each month. Any queries relating to the Forward Decision List should be forwarded to Democratic Services: Democratic.Services@West-Norfolk.gov.uk

What is a Key Decision?

Key decisions are defined as an executive decision which is likely:

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(a) To result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates, or (significant relates to £500,000 or more)

(b) To be significant in terms of its effect on communities living or working in the area comprising two or more wards and electoral divisions in the Council's areas. (significant relates to one third of the population in a ward).

The key decision and non-key decision process is only for decisions made by the Executive, i.e. not those made at Planning, Council, Licensing etc. When assessing whether or not a decision is a key decision the decision maker must consider all the circumstances of the case. However, a decision which results in a significant amount spent or saved will generally be considered to be a key decision.

Why might a decision be made in private?

Members of the public may be excluded from a meeting or information if the nature of the business to be discussed is likely to involve the disclosure of exempt information such as details that could identify an individual or pertain to the financial or commercial interests of a person or organisation. Such information should only be made exempt, if it is in the public interest to do so under Schedule 12A of the Local Government Act 1972.



Cabinet Members:

Councillor Alistair Beales: Leader
Councillor Simon Ring: Deputy Leader and Portfolio Holder for Business
Councillor Jim Moriarty: Portfolio Holder for Planning and Licensing
Councillor Sandra Squire: Portfolio Holder for Environmental and Coastal
Councillor Michale de Whalley: Portfolio Holder for Climate Change and Biodiversity
Councillor Chris Morely: Portfolio Holder for Finance
Councillor Jo Rust: Portfolio Holder for People and Communities
Councillor Sue Lintern: Portfolio Holder for Culture and Events

Cabinet Members can be contacted directly and their contact details can be found via our website: [Committee details - Cabinet](#)

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Senior Management

Kate Blakemore: Chief Executive
Michelle Drewery: Deputy Chief Executive and Section 151 Officer
Emma Kavanagh: Chief Operating Officer
Emma Hodds: Chief of Staff and Monitoring Officer
Siobhan Cleeve: Interim Assistant Director Leisure and Culture
Stuart Ashworth: Assistant Director Environment and Planning
Liz MacDonald: Assistant Director Property & Projects
Martin Chisholm: Assistant Director Operations & Commercial
Duncan Hall: Assistant Director Regeneration, Housing & Place
Carl Holland: Assistant Director for Finance and Deputy Section 151 Officer
Honor Howell: Strategic Lead to the Chief Executive and Leader
Paul Lowes: Assistant Director Corporate Services
Mark Whitmore: Assistant Director, Health, Wellbeing and Public Protection

Members of the Senior Management team can be contacted directly via esteam@west-norfolk.gov.uk



JUNE 2026						
Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
09 June 2026	King's Lynn and West Norfolk new Local Plan - Governance arrangements for the plan-making process	Key	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
09 June 2026	Appointment to Cabinet Sub Committees and Task Groups for 2026 - 2027	Non	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open
09 June 2026	West Norfolk Economic Strategy and Action Plan	Non	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open
09 June 2026	EXEMPT - Disposal of Land at Hunstanton	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Property (Liz MacDonald)	Fully exempt 3 Information relating to the financial or business affairs of any particular person (including



						the authority holding that information)
09 June 2026	Data Protection Policy	Non	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open
09 June 2026 25 June 2026	Health and Safety Policy and Statement of Intent	Non	Cabinet Council	Cabinet Member for People and Communities	Assistant Director, Health, Wellbeing and Public Protection (Mark Whitmore)	Open

JULY 2026

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
14 July 2026	Local Plan Scoping (Regulations 29) - Consultation Materials	Key	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
14 July 2026	Full Year Performance Management Report 2025 - 2026	Non	Cabinet	Leader of the Council	Chief of Staff and Monitoring Officer (Emma Hodds)	Open
14 July 2026	Building Safety Levy - Proposed	Non	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and	Open



	administration by CNC Building Control				Planning (Stuart Ashworth)	
14 July 2026	CIL Strategic Project Funding	Key	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
14 July 2026	Revenue Outturn 2025 -2026	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
14 July 2026	Capital Outturn 2025 - 2026	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
14 July 2026 29 July 2026	Padel	Key	Cabinet Council	Deputy Leader and Cabinet Member for Business	Assistant Director, Leisure and Culture (Siobhan Cleeve)	Open
SEPTEMBER 2026						
Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
08 September 2026	Business Improvement District - Business Plan	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open



08 September 2026	Lynnsport Proposals	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Strategic Advisor to the CEO and Leader (Honor Howell)	Open
24 September 2026			Council			
08 September 2026	National Planning Scheme of Delegation	Non	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
24 September 2026			Council			
08 September 2026	King's Lynn Conservation Area Appraisal and Management Plan	Non	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
24 September 2026			Council			
08 September 2026	Introduction of a surcharge for invalid planning applications	Non	Cabinet	Cabinet Member for Planning and Licensing	Assistant Director, Environment and Planning (Stuart Ashworth)	Open
24 September 2026			Council			
OCTOBER 2026						
Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
13 October 2026	King's Lynn Masterplan and Parking Strategy	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open
29 October 2026			Council			



13 October 2026 29 October 2026	Hunstanton Masterplan and Parking Strategy	Key	Cabinet Council	Deputy Leader and Cabinet Member for Business	Assistant Director, Regeneration, Housing & Place (Duncan Hall)	Open
NOVEMBER 2026						
Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
17 November 2026	Budget Monitoring Quarter 2	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
17 November 2026 03 December 2026	Council Tax Support Scheme for Working Age people for 2027/2028	Key	Cabinet Council	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
JANUARY 2027						
Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt



FEBRUARY 2027

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
03 February 2027	Budget Monitoring Quarter 3	Non	Cabinet	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
03 February 2027 25 February 2027	Medium Term Financial Strategy 2026-2031	Key	Cabinet Council	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	
03 February 2027 25 February 2027	Capital Programme 2026-2030	Key	Cabinet Council	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open
03 February 2027 25 February 2027	Treasury Management Strategy	Key	Cabinet Council	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	
03 February 2027 25 February 2027	Capital Strategy	Key	Cabinet Council	Cabinet Member for Finance	Assistant Director, Finance and Deputy Section 151 Officer (Carl Holland)	Open

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TO BE SCHEDULED

Date of meeting	Report title	Key or Non-Key Decision	Decision Maker	Cabinet Member/Portfolio	Lead Officer	Open or Exempt
	Overnight Campervan Parking in Hunstanton	Non	Cabinet	Leader of the Council	Assistant Director, Operations & Commercial (Martin Chisholm)	Open
	Empty Homes Strategy Review	Key	Council	Cabinet Member for People and Communities	Assistant Director, Health, Wellbeing and Public Protection (Mark Whitmore)	Open
	King's Lynn Town Football Club	Non	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Property (Liz MacDonald)	Fully exempt 3 Information relating to the financial or business affairs of any particular person (including the authority holding that information)
	Housing Assurance Strategy	Non	Council	Cabinet Member for People and Communities	Assistant Director, Health, Wellbeing and Public Protection (Mark Whitmore)	Open
	Domestic Abuse	Non	Council	Cabinet Member for People	Assistant Director,	Open



	Tenants/Residents Policy and Domestic Abuse Intersectionality Policy			and Communities	Regeneration, Housing & Place (Duncan Hall)	
	IT Hardware Refresh	Key	Cabinet	Cabinet Member for Finance	Assistant Director, Corporate Services (Paul Lowes)	Fully exempt
	Local Government Reorganisation Consultation Response	Key	Council	Leader of the Council	Chief Executive (Kate Blakemore)	Open
	Heacham Beach Huts	Key	Cabinet	Deputy Leader and Cabinet Member for Business	Assistant Director, Property (Liz MacDonald)	Part exempt 3 Information relating to the financial or business affairs of any particular person (including the authority holding that information)



REPORT TO CABINET

DATE OF MEETING	9 th June 2026
REPORT TITLE	Health, Safety & Welfare Policy
LEAD MEMBER	Councillor Beales
LEAD OFFICER	Mark Whitmore
CONSULTEES	Corporate H&S Board, ELT
WARDS AFFECTED	None

KEY DECISION	YES/NO
DECISION MAKER	Cabinet Recommendations to Council Part Cabinet Decision and Part Recommendations to Council Other Council Body
IS THE REPORT OPEN OR EXEMPT	OPEN/EXEMPT

FINANCIAL IMPLICATIONS	YES/NO
HR IMPLICATIONS	YES/NO
POLICY IMPLICATIONS	YES/NO
STATUTORY IMPLICATIONS	YES/NO
RISK MANAGEMENT IMPLICATIONS	YES/NO
ENVIRONMENTAL IMPLICATIONS	YES/NO
EQUALITY IMPACT ASSESSMENT COMPLETED	CONFIRM PRE-SCREEN COMPLETED AND IF FULL EIA REQUIRED AND COMPLETED

SUMMARY OF REPORT

The council recognises the importance of ensuring the Health, Safety and Welfare of its employees and members of the public using our buildings and public open spaces. Providing safe working environments is more than just meeting statutory obligations it is also essential to the councils Marmot ambitions, specifically of creating fair employment and good work for all and building healthy and sustainable places and communities.

The policy sets out the arrangements, duties and responsibilities of the council to its staff, the responsibilities of all staff to adhere to the Policy requirements and how these duties and responsibilities will be discharged.

RECOMMENDATIONS

Recommendation to Full Council:

1. To approve the adoption of the Health, Safety & Welfare Policy.
2. To delegate responsibility for approving annual administrative reviews to the Chief of Staff.
3. To note that the policy where significant changes to the policy are made that these will be brought back to council for approval.

REASON FOR DECISION

To ensure that the council has an effective structure for delivering its health and safety functions.



CORPORATE STRATEGY How does this proposal support our Corporate Priorities Our priorities Corporate Strategy 2023 - 2027 Borough Council of King's Lynn & West Norfolk	
Promote growth and prosperity to benefit West Norfolk	
Protect our Environment	
Efficient and effective delivery of our services	The Policy supports the council to deliver its services safely.
Support our communities	

REPORT DETAIL

1. Introduction

- 1.1 The Health & Safety at Work etc Act 1974 requires the council to *“prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all of his employees.”*
- 1.2 The proposed policy has been subject to consultation with the Councils Health & Safety Board, which includes Unison and the Corporate Leadership Team.

2. Background

- 2.1 Following a detailed review of the council’s corporate health and safety arrangements a full review of the councils policy has been undertaken. Following this a new policy has been developed that provides a clear and concise description of the councils arrangements. This is in line with the Health & Safety Executive’s guidance on preparing a written statement.



3. Proposal

- 3.1 It is proposed the new Health, Safety & Welfare Policy is adopted by the council.

4. Options Considered

- 4.1 No other options have been considered as there is a legal requirement to have a written policy and statement of general intent.

5. Financial Implications

- 5.1 Whilst there is no direct financial implications with the adoption of the policy it should be noted that the policy states, in line with legal requirements, that the financial implications of ensuring compliance with health and safety obligations is not in itself a reasonable excuse for not undertaking appropriate steps to comply with the law.

6. HR Implications

- 6.1 As part of the review of the councils Health & Safety functions there is an ongoing review of resource and staffing requirements to ensure that the Council has sufficient resource to meet the legal requirements.

7. Policy Implications

- 7.1 The proposed policy sets out the councils commitment and approach to managing health and safety. The requirements of the policy should be considered when formulating or reviewing other council policies.

8. Climate Change and Environmental Implications and considerations

- 8.1 Not applicable to this report.

9. Statutory and Legal Implications

- 9.1 The council has a legal obligation to have a written policy and statement of intent. The council is also required to comply with all Health & Safety law as it applies to the business of the organisation.

- 9.2 As per the scheme of delegation within the constitution it is a requirement that this policy is reviewed and approved by Council, this report therefore meets that obligation.

10. Local Government Reorganisation Implications

- 10.1 Not applicable to this report.

11. Health and Safety Implications



11.1 The policy addresses the organisational duties and arrangements for ensuring the health and safety of its employees and visitors to its operational land.

12. Consultees

12.1 The consultees for this policy were the Health & Safety Board, the Executive Leadership Team and the Leader of the Council.

13. Equality Impact Assessment

13.1 Pre screening assessment completed and attached to this report.

14. Risk Management Implications

14.1 The proposed policy will affect how the council identifies and manages risk against which the risks identified in the strategic risk register and service risk registers will be assessed against.

15. Conclusion

15.1 The report sets out the legislative requirements for the council to have a written health and safety policy and statement of general intent. The proposed policy, attached at appendix 1, meets these legal requirements, clearly setting out how health and safety will be managed within the council.

15.2 Whilst there are no direct financial or HR implications attached to the adoption of the policy the report outlines that financial considerations alone are not sufficient grounds to make either policy or operational decisions that may compromise the effective management of health and safety at work.

LIST OF APPENDICES

Appendix 1 – Health, Safety & Welfare Policy.

LIST OF BACKGROUND PAPERS

None.

PRE SCREENING EQUALITY IMPACT ASSESSMENT



For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	Health, Safety & Welfare Policy			
Is this a new or existing policy/service/function? (<i>tick as appropriate</i>)	New		Existing	X
Brief summary/description of the main aims of the policy/service/function being screened.	The policy sets out the arrangements the council has in place to ensure it meets its legal obligations in managing Health & Safety within the organisation.			
Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.	The council is required to have a written policy under the Health & Safety at Work etc. Act 1974.			
Who has been consulted as part of the development of the policy/service/function? – new only (<i>identify stakeholders consulted with</i>)	Health & Safety Board Executive Leadership Team			


Question	Answer
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<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. NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p> <p><i>*For more information on health inequalities please visit The King's Fund</i></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	
	Armed forces community			x	
	Care leavers			x	
	Health inequalities*			x	
Other (eg low income, caring responsibilities)			x		

Please provide a brief explanation of the answers above:



The Health and Safety at Work etc Act 1974 and the regulations made under it apply to all employees of the council equally. There are however certain groups who are subject to additional consideration to ensure they are not placed subject to risks, these include anyone under the age of 18, pregnant or new mothers and anyone with a specific disability.

Question	Answer	Comments	
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No		
3. Could this policy/service be perceived as impacting on communities differently?	No		
<p>If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>			
<p>4. 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</p>	Yes / No	<p>Actions:</p>	
		<p>Actions agreed by EWG member: </p>	
<p>5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	Yes / No	<p>Please provide brief summary:</p>	
<p>Assessment completed by: Name</p>			
<p>Job title</p>			
<p>Date completed</p>			
<p>Reviewed by EWG member</p>	 A Demonty	<p>Date</p>	<p>07.05.26</p>
<p><input type="checkbox"/> Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)</p>			





Health, Safety & Welfare Policy

PART ONE- General Statement of Intent

The Borough Council of King's Lynn and West Norfolk recognise that health and safety and welfare of our employees and others affected by our activities is fundamental to the effective delivery of its operations and its strategic aims of:

- Promoting growth and prosperity for the benefit of West Norfolk
- Protecting and enhancing our environment
- Delivering services that are efficient, effective and responsive
- Supporting and strengthening our communities

Our commitment to Health, Safety and Welfare is underpinned by the Principles of Prevention, together with the Council's values and behaviours. These guide the way we protect our workforce and all those who may be affected by our activities.

The Council will ensure the health, safety and welfare of employees and others who may be affected by its activities, in accordance with the Health and Safety at Work etc. Act 1974 and all subsequent regulations. We are committed to meeting our statutory duties and maintaining full compliance with all applicable legislative requirements.

The council will provide, so far as is reasonably practicable:

- A safe working environment for all employees and contractors
- A safe environment for visitors and members of the public visiting council owned or managed premises or activities
- Safe systems of work
- Safe handling, storage and use of substances
- Information, instruction, training and supervision as is necessary to ensure employees are competent in their jobs
- Safe access and egress
- Control and maintenance of workplace and welfare at work

The council:

- Recognises that health, safety and welfare are of paramount importance and an integral part of all its activities
- Is committed to the systematic identification of hazards, control of risk and compliance with applicable legal requirements and other requirements to which it subscribes.
- Will communicate and consult with employees on matters relating to the health, safety and welfare, policies, procedures guidance and performance monitoring.
- Establishes and maintains an effective health, safety and welfare management structure with individual posts having clearly defined responsibilities and competencies.
- Will ensure it provides adequate financial, human and physical resources to provide a working environment that protects the health, safety and welfare of

our employees and the health and safety of those using our facilities or otherwise affected by our working activities.

Successful implementation is dependent on the co-operation of those who carry out the work, and take the risks, to act responsibly and do everything they can to prevent personal injury to themselves or others.

The Chief Executive, Executive Leadership Team, Corporate Leadership Team, Service Managers, Line Managers and Employees, have defined responsibilities which are detailed in Part Two - Organisation.

The overall responsibility for this Policy rests with the Chief Executive and the Leader of the Council. They will be supported by the Executive and Corporate Leadership Teams and the Corporate Health & Safety team in ensuring that this Policy is developed, implemented, maintained, monitored, and reviewed.

Signed: (Chief Executive) Dated:

Signed: (Leader of the Council) Dated:

PART TWO- Organisation

Governance

The Council's organisational responsibilities as they relate to developing a health, safety and welfare policy are defined in the table below. These roles are defined as:

Assigned for developing the Policy and procedure	Environmental Health Manager (Commercial)
Accountable for the policy and implementation	Chief Executive
Consulted prior to final policy implementation or amendment.	Health & Safety Board, Executive Leadership Team, Corporate Leadership Team
Informed of policy implementation or amendment.	All employees of the council

Roles & Responsibility

The Council, as the employer, holds the overall responsibility for ensuring the health, safety, and welfare of all its employees, as well as protecting others who may be affected by its activities. However, health, safety and welfare are not solely the responsibility of the employer. Every employee has a duty to contribute to maintaining a safe working environment, and as an individual's role within the organisation becomes more senior or specialised, their level of responsibility increases accordingly.

The following outlines these delegations;

All Employees

Employees include temporary and agency workers and they must;

- Familiarise with, and conform to, the Health, Safety & Welfare Policy, procedures, and/or guidance.
- Work with due regard to the health, safety and welfare of themselves and that of others who may be affected by their work/activities.
- Co-operate with the council, including complying with all safety instructions given by their line management, to ensure that its obligations with regards to health, safety and welfare are complied with.
- Notify their Line Manager immediately of any health, safety and welfare issues or concerns that they have, that they are not able to put right or are outside their control.
- Report all accidents, incidents and near misses and unacceptable customer behaviour to their line manager.

- Not interfere with, or misuse, anything provided by the council in the interest of health, safety or welfare.
- Ensure that all tools and equipment provided by the council are properly used in accordance with the manufacturer's, supplier's and/or installer's instructions and report any defects to their Line Manager immediately.
- Complete any relevant training assigned to them by the council in the designated timescale.
- Suitable and appropriate protective equipment and clothing will be provided where necessary, and all employees are required to use the equipment provided correctly and consistently whenever it is needed or required for their work.
- Cooperate with any requirement for statutory health surveillance as required due to their duties.

Line Managers

In addition to the responsibilities outlined for employees above, Line Managers are also accountable for the effective implementation of the Health, Safety and Welfare Policy and procedures within their area of control. Whilst some duties may be specifically designated, Line Managers will be responsible for:

- Ensuring they are familiar with the Health, Safety and Welfare Policy and procedures and any relevant risk assessments and safe systems of work.
- Ensuring they are aware of health and safety requirements and provide information, instruction, training and supervision to new and existing employees under their control to ensure, as far as reasonably practicable, their health and safety and that of others affected by their activity.
- Ensure that employees have a suitable level of health, safety and welfare knowledge to keep them and others safe during their first days of work.
- Ensuring that employees under their control are adequately trained and fully aware of the hazards involved in the work undertaken and that all training is completed in a timely manner to ensure compliance.
- Communicating the key findings of risk assessments related to the work undertaken by employees under their control.
- Developing safe systems of work to ensure safety for all, by information, instruction, training, supervision, particularly in the case of young, inexperienced or vulnerable workers, pregnant workers, new mothers and volunteers.
- Ensuring that any information, instruction and training is understood and recorded.

- Reporting and investigating all accidents, incidents, near misses and Unacceptable Customer Behaviour (UCB) with a view to taking such measures to prevent recurrence.
- Undertaking inspections and monitoring to ensure that control measures are being maintained and that all employees are following safety instructions and safe practices.
- Ensuring that Team Meetings regularly occur and always include health, safety and welfare as a standard item, providing opportunities for employees to be consulted on matters which affect their health, safety and welfare.
- Co-operating with trade union health and safety representatives in accordance with agreed processes.
- Arrange for the provision of suitable and appropriate protective equipment and clothing where necessary, ensuring that all staff have access to it, maintain and use it whenever required.
- Raise with Service Managers, Corporate Health and Safety and/or Employees where new guidance or legislation impacts or could affect their work areas.
- Identify all employees whose roles expose them to hazards requiring statutory health surveillance ensuring they are enrolled in the appropriate surveillance programme, which will include access to assessments, maintaining records, and ensuring follow-up actions are completed.

Service Managers

In addition to the responsibilities outlined for Line Managers above, Service Managers are accountable to Assistant Directors for ensuring that the Health, Safety and Welfare Policy and procedures are complied with within their Service Areas. Duties may be delegated (but not responsibility) to Line Managers and other employees as necessary, but they remain responsible for:

- Providing leadership on health and safety.
- Ensuring the availability of resources essential to establish, implement, maintain and improve the health and safety system. Ensuring that Line Managers, are made aware of the areas and extent to their specific health, safety and welfare responsibilities.
- Ensuring adequate inspections, monitoring and review of health, safety and welfare procedures are undertaken.
- Ensuring the systematic assessment of hazards and the effective implementation of risk management systems.
- Ensuring statutory testing and examination of equipment and the keeping of registers and records where necessary is undertaken.
- Ensuring systems are in place for the inspection and maintenance of equipment.
- Ensuring the necessary information, instruction, training and supervision is provided to their employees.

- Ensuring that the necessary resources are available to employees to fulfil their health and safety obligations.
- Keeping themselves informed of incidents, accidents, near misses or Unacceptable Customer Behaviour, within their area of control and ensure that action is taken to prevent recurrence.
- Ensuring the effective safety management systems of contractors carrying out works within their area of responsibility.
- Providing adequate time and facilities for safety representatives.
- Ensuring where activities under their control are subject to statutory health surveillance, both the work and the employees are appropriately monitored.

Assistant Directors

In addition to the responsibilities outlined for Service Managers above, Assistant Directors are also responsible for the successful implementation of the policy within their service areas, they will:

- Define roles, allocate responsibilities and accountabilities, delegate authorities to facilitate effective health and safety management.
- Ensure all employees with the responsibilities above are adequately trained and resourced to fulfil their health, safety and welfare duties.

Executive Leadership Team & Corporate Leadership Team

In addition to the responsibilities outlined for Assistant Directors, the Executive Leadership Team and Corporate Leadership Team, comprising the Chief Executive, Deputy Chief Executive, Chief Operating Officer, Chief of Staff, and all Assistant Directors, are also responsible for:

- Supporting the Chief Executive in meeting their Health & Safety responsibilities for the council.
- Ensuring that robust health, safety and welfare management systems exist within the council and all service areas demonstrate compliance.
- Ensuring the council has a suitably trained, qualified and resourced Corporate Health Safety Team to carry out specified duties across the authority.

The Chief Executive

In addition to the responsibilities outlined above the Chief Executive holds the overall accountability for health, safety and welfare across the council.

Elected Members

Whilst not employees, elected members must have regard to health, safety and welfare in their council decisions and actions.

- Members will be provided with the opportunity to attend relevant training to enable them to appreciate and understand the obligations placed on the Chief Executive, the Executive and Corporate Leadership Teams.
- Elected members have access to the health and safety information booklet from the LGA Health and Safety in the council- Councillor workbook.

Specific Roles

Alongside the general levels of responsibility within the organisation, several specialised roles provide targeted support to ensure the council can effectively fulfil its health, safety and welfare functions.

Assistant Director Health Wellbeing & Public Protection will act as the Corporate Leadership Team (CLT) team representative for health and safety. As such they will actively promote and progress corporate health and safety issues and actions at Corporate Leadership Team.

Assistant Director Corporate Services will act as the Corporate Leadership Team (CLT) team representative for staff welfare. As such they will actively promote and progress corporate welfare issues and actions at Corporate Leadership Team.

Corporate Health & Safety Team provide competent Person advise as defined by Regulation 7(1) of the Management of Health and Safety at Work Regulations 1999, to oversee the implementation of the Health, Safety and Welfare Policy and procedures on behalf of the council, ensuring it complies with current legislation.

The team will provide advice, guidance and support to the council on all health, safety and welfare, including on:

- Provide an analysis of the potential implications of new health, safety and welfare legislation on council services, along with an assessment of how additional legislation highlighted by employees or subject experts may influence the council's operations of new legislation and its impact on the council
- Review and assess risk assessments, where appropriate.
- Safe systems of work for operations undertaken by the council and review and report on safety recommendations issued.
- Maintain an overview of the systems in place for the management of contractors' health and safety.

- Develop and review the corporate Health, Safety and Welfare Policy, procedures and guidance which provide detail on specific health, safety and welfare requirements.
- Manage and maintain the council's health and safety system.
- Audit and inspect as necessary the council's operations and advise appropriate officers of any actions necessary to ensure compliance with the health and safety systems.
- Maintain an overview of fire safety within the council, including within premises occupied by the Council.
- Provide health and safety performance reports to the Health & Safety Board and an annual health and safety performance report to the Chief Executive and Corporate Leadership Team.
- Advise on and, as necessary, facilitate the provision of training courses in accordance with the corporate training programme, including induction training and e-learning.
- Support the investigation, as necessary, of accidents, incidents and near misses and unacceptable customer behaviour and recommend corrective action.
- Take immediate direct action in cases of imminent danger, where that action cannot be taken by Line Managers.
- Record and review details of accidents, incidents or near misses at work, unacceptable customer behaviour and provide advice on ways in which recurrence could be minimised or eliminated.
- Liaise, where required, with the Health & Safety Executive (HSE) and other enforcement authorities and external bodies on health and safety issues.

Human Resources duties are to:

- Advise as required on all matters relating to sickness absence and employee welfare issues, including compliance with relevant legislation and good practice.
- Will signpost employees to the welfare, wellbeing and mental health provision that the council offers including Employee Assistance programme (EAP) and Occupational Health
- Retain the services of Occupational Health Services that provide advice on matters relating to occupational health.

Corporate Health and Safety Board responsibilities are defined within the terms of reference. The boards overriding objectives are to:

- Ensure a positive culture of health, safety and welfare across the Council by promoting cooperation between the Council, as an employer, and its employees and contractors in instigating, developing and carrying out

measures to ensure the health & safety, of our employees and others affected by our work and also the welfare and wellbeing of our employees at work.

- Serve as a channel for encouraging employee involvement and consultation in promoting and improving health, safety and welfare, through activities approved by the board.
- Provide a strategic overview of health, safety and welfare in the organisation and be committed to driving continuous improvement regarding health, safety and welfare at the Council.
- Ensure the Council complies with all legal requirements and the requirements set out in the Health, Safety and Welfare Policy.
- Keep an approved Terms of Reference (ToR) under regular review.

Safety Representatives recognised Trade Union and non-trade union safety representatives can exercise their rights to:

- Get involved in investigations for reportable accidents/incidents.
- Represent the views of the employees.
- Undertake inspections of the workplace and formally report back to Health and Safety Board and the Corporate Health & Safety Team.
- Be consulted on any changes to corporate documentation and procedures.

Volunteers

Some aspects of engaging and working with volunteers are covered by health and safety legislation. Any service utilising volunteers will be required to take account of their role in risk assessments and follow HSE guidance ([Volunteering: Guidance for employers](#))

Wholly owned companies

This Health, Safety and Welfare Policy applies solely to the activities of the Borough Council. It does not extend to any wholly owned companies, which are responsible for maintaining their own Health & Safety policies.

PART THREE - Arrangements

Policies, Procedures & Guidance

The Health, Safety and Welfare Policy is supported by a range of additional procedures and guidance designed to control specific hazards encountered within the Council. All related documents are available in the Health & Safety section of the Councils Intranet.

Health & Safety Training/Competence

The health and safety training requirements for all employees will be identified on induction on a regular ongoing basis and at the individual's annual appraisal. Key health and safety training for all employees is documented in the Council's Learning Management System.

Monitoring

The monitoring of this Policy will be carried out by the Corporate Health & Safety Team, actively through health and safety auditing and inspections and reactively by supporting the investigation of accident, incidents, near miss, unacceptable customer behaviour and ill health statistics.

All monitoring activity will be reported to the Corporate Health & Safety Board.

An annual Health & Safety Performance Report will be provided to the Health & Safety Board by the Corporate Health & Safety Team. Quarterly assurance reports will also be provided to the Board.

Review

Corporate Health & Safety team will review the policy annually, or earlier if changes in health and safety legislation, guidance, or other relevant circumstances require it. In addition, every three years the policy will be reviewed by Council.

Details of the review and any recommendation will be provided to the Health & Safety Board and Corporate Leadership Team.

Version Control

Version number	Summary of Changes	Responsible Officer	Date Approved
0.1	New format and content to replace previous General Health, Safety and Welfare Policy V.5 Jan 2025	Philippa Smith	



REPORT TO CABINET

DATE OF MEETING	9 June 2026
REPORT TITLE	Data Protection Policy 2026
LEAD MEMBER	Cllr A Beales, Leader
LEAD OFFICER	Tom Darling-Fernley, Senior Corporate Governance Officer
CONSULTEES	Executive Leadership Team
WARDS AFFECTED	n/a

KEY DECISION	NO
DECISION MAKER	Cabinet
IS THE REPORT OPEN OR EXEMPT	OPEN

FINANCIAL IMPLICATIONS	YES
HR IMPLICATIONS	YES
POLICY IMPLICATIONS	YES
STATUTORY IMPLICATIONS	YES
RISK MANAGEMENT IMPLICATIONS	YES
ENVIRONMENTAL IMPLICATIONS	NO
EQUALITY IMPACT ASSESSMENT COMPLETED	Pre-screening completed. Full EIA not required, see section below.

SUMMARY OF REPORT

The Council's Data Protection Policy was last revised in June 2024. This report presents a substantially revised Policy for Cabinet approval. The revision responds to the Data (Use and Access) Act 2025 ("DUAA"), which introduces a statutory requirement, taking effect on 19 June 2026, for the Council to have a published data protection complaints procedure in place. The revised Policy also updates and restructures the document to reflect the current legal landscape, to align with the Council's standard policy document layout, and to reflect changes to the Council's information governance structure since the 2024 edition. There are no direct financial implications arising from this report.

RECOMMENDATIONS

Cabinet resolves to:

1. Approve the Data Protection Policy 2026 at Appendix A, to take effect from the date of this meeting.
2. Note that the data protection complaints procedure required under section 103 of the Data (Use and Access) Act 2025 (inserting section 164A into the Data Protection Act 2018) will be published on the Council's website by 19 June 2026 in accordance with the statutory deadline.

3. Authorise the Data Protection Officer, in consultation with the Leader of the Council to update the Policy between formal review cycles where required by changes to ICO guidance or legislation, subject to those updates being reported to the next available Cabinet meeting.

REASON FOR DECISION

The Council has a statutory obligation to comply with UK GDPR, the Data Protection Act 2018, and from 19 June 2026 the data protection complaints procedure requirement introduced by the Data (Use and Access) Act 2025. The existing policy predates the DUAA and does not reflect the new complaints procedure obligation.

Approval of the revised Policy is necessary to ensure the Council is demonstrably compliant with its legal obligations by the statutory deadline, to protect individuals whose data the Council processes, and to protect the Council from the risk of regulatory enforcement action by the Information Commissioner's Office.

CORPORATE STRATEGY

How does this proposal support our Corporate Priorities [Our priorities | Corporate Strategy 2023 - 2027 | Borough Council of King's Lynn & West Norfolk](#)

Promote growth and prosperity to benefit West Norfolk	Robust data protection practice underpins the Council's commercial and economic development functions, including in relation to business support, inward investment, and the Council's commercial leisure operations, all of which involve processing personal data at scale.
Protect our Environment	No direct linkage.
Efficient and effective delivery of our services	The revised Policy supports the Council's ambition to deliver services to residents, businesses and visitors in a timely, accessible and trustworthy manner. Sound information governance is a prerequisite for effective digital and transactional service delivery.
Support our communities	The Council's community-facing services (including but not limited to housing benefit, homelessness, social prescribing and health and wellbeing programmes) involve processing sensitive personal data. This Policy ensures those activities are conducted lawfully and with the dignity of residents at the fore. The Corporate Strategy 2023–2027 explicitly lists Data Protection as a foundational corporate plan underpinning delivery of the strategic priorities.

REPORT DETAIL

1. Introduction

- 1.1. The Council, as a public authority, is a data controller under the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA 2018"). The Council's Electoral Services department is also a data controller. This policy applies to both. The Council and its partners and contractors process personal data across all its service areas and are legally required to do so in accordance with data protection legislation.
- 1.2. The Council's Data Protection Policy sets out how personal data is collected, stored, used and protected. It applies to all officers, elected Members, contractors and any person processing personal data on the Council's behalf.
- 1.3. The Policy was last formally approved by Cabinet on 11 June 2024 (item CAB16). A substantially revised version is now presented for approval.

2. Background

- 2.1. The Council has maintained a Data Protection Policy since the introduction of the General Data Protection Regulation in May 2018. The Policy has been revised periodically: most recently in November 2023 (version 0.03) following routine review.
- 2.2. On 19 June 2025, the Data (Use and Access) Act 2025 ("DUAA") received Royal Assent. The DUAA amends but does not replace the UK GDPR and the DPA 2018. Most of its data protection provisions came into force on 5 February 2026. Section 103 of the DUAA inserts a new section 164A into the DPA 2018, which requires organisations to have a published data protection complaints procedure in place by 19 June 2026. This is a hard statutory deadline.
- 2.3. Separately, the ICO published updated guidance on handling data protection complaints in February 2026, setting out what an adequate complaints procedure must contain, including: a requirement to acknowledge complaints within 30 calendar days; a duty to investigate without undue delay; and a requirement to communicate outcomes and signpost complainants to the ICO where they remain dissatisfied.
- 2.4. The existing Policy predates the DUAA and does not adequately address the complaints procedure requirement. A substantive revision is therefore necessary both to achieve statutory compliance by 19 June 2026 and to bring the Policy up to date with the broader legal landscape.

- 2.5. The revision has also been used as an opportunity to restructure the Policy in line with the Council's standard policy document taxonomy, to update the Council's information governance role structure (replacing Information Asset Assistants with a wider network of Information Governance Leads), and to remove and cross-refer to guidance-level material that is more appropriately located in supporting procedural documents and appendices.

3. Proposal

- 3.1. Cabinet is asked to approve the revised Data Protection Policy 2026, at Appendix A. The key changes from the 2023 edition are as follows:

Data protection complaints procedure (new)

- 3.2. The most significant change is the introduction of a dedicated complaints procedure in response to section 103 of the DUAA. The procedure sets out how individuals can raise a data protection complaint with the Council, the Council's acknowledgement obligation (within 30 calendar days), the investigation and outcome process, and the route of escalation to the ICO. A complaint is broadly defined: it covers any expression of dissatisfaction about how the Council has handled personal data and does not need to reference legislation to qualify. The procedure will be accompanied by an accessible electronic complaint form to be published on the Council's website by 19 June 2026.

Updated legal framework

- 3.3. The Policy's legal framework section has been expanded to provide brief contextual narrative against each piece of relevant legislation, and to incorporate the DUAA.
- 3.4. The Regulation of Investigatory Powers Act 2000 ("RIPA") and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 have been added in light of the Council's operation of CCTV and the sharing of CCTV footage with Norfolk Constabulary under a formal Service Level Agreement.
- 3.5. The Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR") have been given greater prominence in recognition of the Council's commercial leisure and cultural operations, which are subject to PECR's requirements around marketing communications and cookies.

Restructured to policy template

- 3.6. The 2023 edition did not follow the Council's standard policy document layout. The revised Policy adopts this structure, with a clear Executive Summary,

Introduction, Aims, SMART Objectives, Scope, Definitions, Legal Framework, Roles and Responsibilities, Policy provisions, Governance Arrangements, Additional Resources, and Equality, Diversity and Inclusion section.

Clear objectives (new)

- 3.7. The revised Policy includes four SMART objectives: establishing the complaints procedure by 19 June 2026; improving response-on-time performance for data subject access requests and freedom of information requests; increasing information governance competence through training and the IG Leads network; and improving transparency and record-keeping, including via the regularisation of Article 30 records and proactive publication of disclosures.

Information governance structure updated

- 3.8. The role of Information Asset Assistant has been replaced by Information Governance Lead, reflecting a broader remit: IG Leads carry heightened awareness of information governance across their service area, maintain Article 30 records, and act as first points of contact for information rights requests and data protection complaints within their teams.

Roles and responsibilities clarified

- 3.9. The Policy now clearly distinguishes between the accountability of the SIRO (the Chief Executive, who is accountable for information risk) and the operational responsibility of the DPO (the Corporate Governance Manager, to whom the SIRO delegates day-to-day compliance). This is consistent with the ICO's expectations for demonstrable governance structures.

Scope clarified to include non-corporate channels

- 3.10. The Policy now expressly addresses personal data processed by officers or Members via personal devices or non-corporate messaging platforms in the course of Council functions. Such data falls within the scope of UK GDPR and this Policy, consistent with ICO guidance on personal email and messaging accounts.

Guidance-level material relocated

- 3.11. Material that was previously embedded in the policy body, including detailed breach reporting steps, DPIA criteria, and FOI procedural requirements, has been streamlined in the Policy and relocated to supporting procedural documents and appendices, making the Policy itself a cleaner statement of the Council's obligations and commitments.

Appendix A (data protection principles) enhanced

- 3.12. The revised Appendix A sets out each of the six UK GDPR data protection principles with worked examples drawn from district council service areas, to aid officer understanding and application.

Appendix B (conditions for special category and criminal offence data) enhanced

- 3.13. Appendix B to the policy now links explicitly to the Council's data retention schedules to identify processing activities that engage special category and criminal offence data. More generally, this appendix together with the policy now constitute an "appropriate policy document" for the Council within the meaning of the Data Protection Act 2018.

4. Options Considered

Option 1: Approve the revised Policy (recommended)

- 4.1. This is the only option that achieves statutory compliance with the DUAA by 19 June 2026 and brings the Council's policy framework up to date with the current legal landscape.

Option 2: Defer approval

- 4.2. This would see the Council push the full policy approval back in time and publish the complaints procedure as a standalone document. It would be technically possible to publish a standalone complaints procedure to meet the 19 June 2026 deadline without revising the full Policy. However, this would leave the Policy outdated and inconsistent with the procedure and would require a further Cabinet report in the short term. It is not recommended.

Option 3: Do nothing

- 4.3. Failure to have a published data protection complaints procedure in place by 19 June 2026 would place the Council in breach of a statutory obligation under the DPA 2018 (as amended by the DUAA). This would expose the Council to regulatory enforcement action by the ICO, potential punitive financial penalties and reputational damage. This option is not recommended.

5. Financial Implications

- 5.1. The revised Policy does not give rise to any direct financial implications. The complaints procedure will be administered within existing Corporate Governance team capacity. The Council's annual ICO registration fee is already met within existing budgets.

- 5.2. Non-compliance with data protection legislation carries significant financial risk. The Information Commissioner is empowered as regulator to issue effective, proportionate and dissuasive penalties for infringements.
- 5.3. Public bodies are usually issued with reprimands but can be issued with financial penalties in the most egregious cases. Egregiousness is determined as part of assessing the seriousness of an infringement.
- 5.4. For failure to comply with any of the data protection principles, any rights an individual may have under DPA 2018 Part 3, or in relation to any transfers of data to third countries, a higher maximum applies, which is £17.5mn or 4% of “turnover” (whichever is higher).
- 5.5. For infringement of other provisions, such as administrative requirements of the legislation, a standard maximum applies, which is £8.7 million or 2% of turnover.

6. HR Implications

- 6.1. The revised Policy reinforces existing mandatory data protection training requirements for all officers and Members. Targeted additional training for Information Governance Leads and customer-facing teams on recognising and escalating data protection complaints will be delivered by 19 June 2026, within existing team capacity.

7. Policy Implications

- 7.1. The revised Policy is designed to support the Council’s Corporate Strategy 2023–2027, which lists Data Protection as a foundational corporate plan. It has also been restructured to align with the Council's standard policy document structure.
- 7.2. It complements and should be used in conjunction with the Council's ICT Security Policy, Retention and Disposal Policy, Retention Schedules, Publication Scheme, CCTV Code of Conduct, and supporting internal procedures for information governance and data protection.
- 7.3. Other policy development follows on from this work, to ensure the Council is equipped with a comprehensive information governance policy suite to support its ongoing work.

8. Climate Change and Environmental Implications and considerations

- 8.1. NONE

9. Statutory and Legal Implications

- 9.1. The primary legislative framework is the UK GDPR, the DPA 2018 (as amended by the DUAA), and the DUAA itself. Section 103 of the DUAA

(inserting section 164A into the DPA 2018) creates a statutory obligation to have a published data protection complaints procedure in place by 19 June 2026.

- 9.2. The Council acts as data controller. Failure to comply with data protection legislation exposes the Council to enforcement action by the ICO, including fines of up to £17.5 million or 4% of annual global turnover (whichever is higher) for the most serious breaches, and to claims for compensation from affected individuals.
- 9.3. The Policy has been drafted by the DPO and reviewed by Legal Services.

10. Local Government Reorganisation Implications

- 10.1. The Council is engaged in local government reorganisation ("LGR") planning. The data protection obligations addressed by this Policy apply regardless of the LGR timeline. Compliance with the 19 June 2026 statutory deadline from the DUAA for a complaints procedure is not discretionary.
- 10.2. The DPO is engaged with LGR programme leads to ensure information governance arrangements are addressed within transition planning. Following the Secretary of State's "minded-to" decision, a future unitary West Norfolk Council will require new data protection policy arrangements to support its wider service remit.

11. Health and Safety Implications

- 11.1. NONE directly. The Policy's security provisions, including the obligation to report data breaches promptly, support the health and safety of individuals whose data the Council holds by minimising risks from unauthorised disclosure.

12. Consultees

- 12.1. The revised Policy has been developed by the DPO within Corporate Governance and reviewed by the Executive Leadership Team. The Leader of the Council has been briefed.
- 12.2. No trade union consultation is required as the Policy does not materially alter terms and conditions of employment, though the mandatory training requirements have been noted to HR.

13. Equality Impact Assessment

- 13.1. A pre-screening Equality Impact Assessment has been completed. No disproportionate negative impacts on any protected group have been identified. The Policy's data protection complaints procedure has been

designed to be accessible to all, with alternative submission routes (email, post, in-person via appointment with the DPO) supplementing the online complaint form to ensure no individual is excluded by reason of disability, language, or literacy. A full impact assessment is not required.

- 13.2. There is a need noted from CEWG review of the pre-screening below to ensure that all can access the relevant information and understand how to complain or receive assistance to complain under this policy. Suitable measures will be taken in this regard prior to the revised policy going live.

14. Risk Management Implications

- 14.1. The primary risk is failure to publish a compliant data protection complaints procedure by 19 June 2026, which would place the Council in breach of a statutory obligation and expose it to ICO enforcement. This risk is mitigated by Cabinet approval of the Policy at this meeting, with the complaint form and published procedure to follow by the statutory deadline.
- 14.2. A secondary risk is inadequate staff awareness of the new complaints procedure, leading to complaints not being recognised or escalated correctly. This is mitigated by the targeted training programme for IG Leads and customer-facing teams committed to in the Policy's objectives.
- 14.3. A third risk is that the ICO issues further guidance on complaints procedures following the 19 June 2026 commencement date that requires adjustments to the Council's approach. Recommendation 3 above addresses this by authorising the DPO to make non-material updates between review cycles.
- 14.4. Item S6 on the corporate risk register is intended to address ongoing information risk and its management.

15. Conclusion

- 15.1. The Data (Use and Access) Act 2025 places a hard statutory deadline of 19 June 2026 on the Council to have a published data protection complaints procedure in place. The revised Data Protection Policy 2026 meets that obligation, links to and underpins the Council's Corporate Strategy, updates the Council's data protection framework to reflect the current legal landscape, and restructures the Policy to align with the Council's standard document template.
- 15.2. Cabinet is asked to approve the Policy to enable implementation ahead of the statutory deadline.


LIST OF APPENDICES
Appendix A: Proposed Data Protection Policy 2026

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LIST OF BACKGROUND PAPERS
Data (Use and Access) Act 2025 ICO guidance: How to deal with data protection complaints (February 2026) Borough Council of King's Lynn & West Norfolk Corporate Strategy 2023–2027 Extant Data Protection Policy v0.03

PRE SCREENING EQUALITY IMPACT ASSESSMENT					
For equalities profile information please visit Norfolk Insight - Demographics and Statistics - Data Observatory					
Name of policy/service/function	Data Protection Policy 2026				
Is this a new or existing policy/service/function? (<i>tick as appropriate</i>)	New		Existing	<input checked="" type="checkbox"/>	
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, and identify relevant legislation.	<p>This policy revision aligns with Corporate Strategy, introduces a process for data protection complaints, aligns with the KLWN policy template, and rationalises the policy making it easier to follow.</p> <p>There is a clear legal framework around the activities described, captured in the relevant sections of both the policy and the attendant Cabinet report.</p>				
Who has been consulted as part of the development of the policy/service/function? – new only (<i>identify stakeholders consulted with</i>)	n/a				
Question	Answer				
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?		Positive	Negative	Neutral	Unsure
	Age			<input checked="" type="checkbox"/>	
	Disability			<input checked="" type="checkbox"/>	
	Sex			<input checked="" type="checkbox"/>	
	Gender Re-assignment			<input checked="" type="checkbox"/>	
	Marriage/civil partnership			<input checked="" type="checkbox"/>	

Please tick the relevant box for each group. NB. Equality neutral means no negative impact on any group. <i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i> <i>*For more information on health inequalities please visit The King's Fund</i>	Pregnancy & maternity			<input checked="" type="checkbox"/>	
	Race			<input checked="" type="checkbox"/>	
	Religion or belief			<input checked="" type="checkbox"/>	
	Sexual orientation			<input checked="" type="checkbox"/>	
	Armed forces community			<input checked="" type="checkbox"/>	
	Care leavers			<input checked="" type="checkbox"/>	
	Health inequalities*			<input checked="" type="checkbox"/>	
	Other (eg low income, caring responsibilities)			<input checked="" type="checkbox"/>	
Please provide a brief explanation of the answers above: This policy update has neutral impacts on the protected characteristics listed above, with the exception of people on lower incomes. Here, there is a moderate risk to equity of access to processes. Mitigating actions are discussed later in this pre-screening.					
Question	Answer	Comments			
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No	There is a moderate risk arising from equity of access to the processes under this policy that support data subjects' rights.			
3. Could this policy/service be perceived as impacting on communities differently?	No				
If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary: Decision agreed by EWG member:					
4. 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	Yes	Actions: Risk under question 2 is already mitigated through use of plain English, translation services and a variety of communication media. Access and routes to these will be clarified ahead of the policy go-live.			

agreed actions in the comments section		Actions agreed by EWG member:	
5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes	Please provide brief summary:	
Assessment completed by: Name	Tom Darling-Fernley		
Job title	Senior Corporate Governance Officer		
Date completed	29 April 2026		
Reviewed by EWG member	Alison Demonty 	Date	30 April 2026
<input checked="" type="checkbox"/> Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)			
Revision 7			



Data Protection Policy

Owner	Data Protection Officer (Interim Corporate Governance Manager)		
Responsible Person	Senior Corporate Governance Officer		
Review Cycle	Two years, or on legislative change	Next Review Date	June 2028
Equality Impact Assessment (EIA) Date	29 Apr 2026	Date approved by the CEWG	30 Apr 2026
List any other impact assessments that have been completed	Not applicable		
Date approved by Cabinet			
Published to	Public		
Stakeholders consulted	Executive Leadership Team		

Revision Record		
Rev. No.	Date of Issue	Reason for Revision
1.00	May 2026	Adapting to Data (Use and Access) Act 2025 and aligning policy and procedure. Staffing changes.
0.05	Apr 2026	Rationalised bookmarks for accessibility.
0.04	Jun 2024	Cabinet approval of revised policy (11 Jun 2025 item CAB16).
0.03	Nov 2023	Review period.
0.02	Nov 2022	Review period / following UK GDPR.
0.01	May 2018	Introduction of GDPR.

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1. Executive summary

- 1.1. This Data Protection Policy sets out how the Borough Council of King's Lynn and West Norfolk ("the Council") collects, stores, uses and protects personal data. It applies to all Elected Members, officers, contractors and any person processing personal data on the Council's behalf.

Policy at a glance:

- Lays out four time-bound objectives for improving the Council's performance in relation to data protection and information governance.
- Defines the Council's approach to people's data rights under the relevant legislation – GDPR, Data Protection Act 2018 and Freedom of Information Act 2000.
- Links data protection and information governance to the Council's Corporate Strategy as a key enabling pillar.
- Sets out our tools and timescales for responding to requests.
- Sets out a clear process for data protection complaints under new legislation – the Data (Use and Access) Act 2025.
- Sets up a network of Information Governance Leads to support their teams and respective Information Asset Owners in their execution of this policy.

2. Introduction

- 2.1. This policy sits within the Council's broader corporate governance framework as referenced in the Corporate Strategy 2023–2027. The strategy places data protection alongside equality and climate change part of a foundational corporate plan that enables the delivery of four strategic priorities. This policy gives operational substance to that commitment.
- 2.2. Sound data stewardship underpins the Council's commitment to efficient and effective service delivery. The strategy sets out an ambition to provide information to residents, businesses and visitors in a timely and accessible manner, consult meaningfully with communities, and retain a skilled, trusted workforce. This requires disciplined handling of personal data.
- 2.3. Equally, the Council's drive to support communities involves processing sensitive personal data at scale. This policy ensures those activities are conducted lawfully, proportionately and with the dignity of residents at the fore.
- 2.4. The Council's operating principles of transparency, respect and collaborative working are only credible if the organisation can be trusted with people's

information. This policy establishes clear accountability, defined retention standards, and robust individual rights processes.

- 2.5. The Council supports the aims and provisions of the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (“DPA 2018”) and seeks to ensure compliance with same. It also lays out the Council’s response to the Digital (Use and Access) Act 2025 (“DUAA 2025”). The DUAA 2025 amends but does not replace the UK GDPR and the DPA 2018, and most of its data protection provisions came into force on 5 February 2026. The requirement for organisations to have a published data protection complaints procedure takes effect on 19 June 2026.
- 2.6. The Council is a data controller. The Council’s Electoral Services department is also a data controller. This Data Protection Policy applies to both and references to “the Council” throughout this policy are to both controllers.
- 2.7. Elected Members act in their role within the Council and where they do, this policy applies to them. At other times, elected Members are data controllers in their own right. In those circumstances, they will control and be accountable for how they implement the processing of data under the legislation.
- 2.8. **Compliance with this policy is mandatory.** Failure to comply may expose individuals to disciplinary action or personal criminal liability, and the Council to enforcement action by the Information Commission, financial penalties and reputational damage.

3. Aims

3.1. This policy aims to:

- help Elected Members, officers and other relevant persons meet their data protection obligations under relevant legislation;
- balance the Council's need to collect and process personal data with the rights of individuals to control their information and their privacy;
- set out the principles the Council applies when processing personal data to safeguard one of its most valuable assets and do so legally;
- establish and maintain a procedure for handling data protection complaints; and
- support the Council's wider corporate objectives through responsible, transparent information management.

4. Objectives

Objective 1: Establish a clear procedure for data protection complaints

4.1. The DUAA sets out a requirement to establish and maintain a procedure for handling data protection complaints.

In time for or starting from 19 June 2026, the Council will:

- Publish a data protection complaints procedure and an accessible electronic complaint form.
- Acknowledge all data protection complaints within 30 calendar days of receipt. Investigate all complaints without undue delay, keeping complainants informed of progress.
- Communicate the outcome of every complaint, including reasons and the complainant's right to escalate to the Information Commission.
- Maintain a central, structured log of complaints with clear investigation ownership and a focus on learning outcomes with attributed actions.
- Towards the end of the 2026-27 financial year, reflect on performance so far and refine procedures and quality targets for data protection complaints.

Objective 2: Improve performance on information governance requests

- 4.2. The Council seeks to improve the rate of on-time response to data subject access requests (DSARs), freedom of information requests (FOIRs), and reports of potential data breaches.

The Council will:

- Respond to DSARs and other data subject rights requests within one calendar month (extendable by two months for complex requests).
- Achieve a DSAR response-on-time rate of 90% by the end of September 2026, and 95% by the end of March 2027.
- Achieve an FOIR response-on-time rate of 95% by the end of September 2026.
- Achieve a potential data breach investigation response-on-time rate of 90% by the end of March 2027.
- Achieve an on-time rate of 100% for notifications of qualifying potential breaches to the Information Commission (according to their guidance) by the end of June 2026.

Objective 3: Increase information governance competence and awareness

- 4.3. Information governance sits within the Council's Corporate Governance team. Capacity in this team is finite, and there is a need to propagate and diffuse relevant knowledge and ownership throughout the organisation.

The Council will:

- Publish and maintain an e-learning module on data protection with mandatory refreshers for all officers and Elected Members on an annual basis. Target 95% completion within the first quarter of each financial year.
- Establish and embed a network of information governance leads ("IG Leads") in each service area of the Council.
- Support IG Leads to maintain their heightened awareness of information governance matters above the mandatory baseline for all officers and Members, to be the go-to contact points for all requests as relevant to their respective teams, and to maintain Article 30 records and information asset registers for their teams.
- Deliver targeted training for IG Leads and customer-facing teams on recognising and escalating data protection complaints, by 19 June 2026.

Objective 4: Improve transparency, record keeping, and risk assessment

- 4.4. The Council's Publication Scheme, Article 30 records, information asset registers, retention and disposal policies require review and alignment. Proactive appropriate disclosure of FOIA disclosures is deemed best practice.

The Council will:

- By the end of September 2026, consider updates to the Council's 2019 Publication Scheme and validate its alignment with the Information Commissioner's model scheme.
- By the end of September 2026, consider updates and realignment of the Council's policies, schedules and toolkit relating to data retention and disposal.
- Via the network of IG Leads, regularise the approach to Article 30 records and information asset registers on a team-by-team basis, and achieve updates and full compliance by the end of June 2026.
- Up-skill IG Leads through courses, seminars and discussion and develop suitable measures of this by the end of September 2026.
- Subject to suitable limits and exemptions, publish FOIR disclosures proactively via the Council's website (or other suitable platform) by the end of March 2027.
- Where proposed processing activities are high-risk, ensure that proposals to approvers are accompanied by a complete data protection impact assessment that has been reviewed and checked by the Data Protection Officer or their nominated representative.

5. Scope

5.1. This policy applies to:

- all employees of the Council: permanent, temporary or agency; past or current;
- elected Members, in exercising their Council role;
- contractors, consultants, partners, volunteers and others acting on behalf of the Council;
- council-owned companies and entities processing data on behalf of the Council; and
- data processors engaged by the Council under written contract.

5.2. It applies to all personal data processed by or on behalf of the Council, regardless of media (including but not limited to electronic, paper, audio or visual recordings, and non-corporate communications channels) and regardless of location.

5.3. In respect of personal data processed by officers or Elected Members for work purposes via personal means (be that via physical media, devices, accounts, non-corporate messaging platforms, or any other means), this information falls within the scope of UK GDPR and this policy. The Information Commission publishes [guidance on official information held in non-corporate communications channels](#).

6. Definitions

Article 30 record of processing activities – The mandatory record of data processing activities maintained by a data controller. For the Council, this is an aggregate of templated documents maintained on a per-service basis alongside an information asset register.

Consent – Permission by the data subject to process their personal data. The consent must be freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement, or by a clear affirmative action, signifies agreement to the processing of their personal data. Consent can be withdrawn at any time.

Criminal offence data – Information relating to a data subject's criminal convictions, offences, allegations, investigations or proceedings. Requires additional lawful basis for processing.

Data controller – The person who (either jointly or in common with other persons) determines the purposes for and the means in which any personal data is or are to be processed. NB: the Data Controller is usually a company or organisation and is not an individual within that company or organisation.

Data processor – Any third party that processes personal data on behalf of a data controller.

Data protection complaint – Any expression of dissatisfaction by a data subject about the way their personal data has been collected, used, stored, shared or otherwise processed. Covers DSAR/rights-request handling, data security (including breach impacts), accuracy, retention, and collection practices. Does not need to reference legislation to qualify.

Data subject – Any living individual who is the subject of personal data.

DSAR or data subject access request – A request made by an individual (or a person acting on their behalf) to know whether the Council holds their personal data and, if so, to receive a copy. The Council must respond within one calendar month, subject to identity verification and applicable exemptions under the DPA 2018.

DPIA or data protection impact assessment – A risk assessment prior to data processing that is likely to result in a higher risk to data subjects' rights and freedoms (UK GDPR Art. 35).

GDPR or UK GDPR – The United Kingdom General Data Protection Regulation. This is European Union law retained via the European Union (Withdrawal) Act 2018. It governs how personal data is handled in the UK.

Information asset register – A record maintained by each Directorate documenting the personal data it processes, including the purpose, lawful basis, retention period, and any third-party sharing arrangements. Maintenance of these records is a legal requirement under UK GDPR Article 30 and is the responsibility of the relevant Information Asset Owner.

Personal data – Any information relating to an identified or identifiable person. This includes information which can directly or indirectly identify the individual and can include name, identification number, location data, online identifier, or factors specific to the physical, physiological, genetic, mental economic, cultural, or social identity of that natural person.

Processing – Any treatment of personal data: it includes collecting, recording, organising, structuring storing, altering, retrieving, using, disclosing, sharing, making available as well as restricting, erasing, and destroying.

RoPA – See **Article 30 record of processing activities**

Special category data – Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, or data concerning sex life or sexual orientation. Requires additional lawful basis for processing.

7. Legal framework and relevant legislation

- 7.1. The Council's data protection obligations arise from the following primary and secondary legislation.

**European Convention on Human Rights (“ECHR”)
Human Rights Act 1998 (“HRA”)**

- 7.2. The HRA translates the ECHR into UK law. ECHR Article 8 (right to respect for private and family life) underpins the Council's data protection obligations and must be considered wherever the Council's processing activities engage individuals' reasonable expectation of privacy.
- 7.3. The Council's compliance with UK GDPR and this policy is consistent with and supports its duties under the HRA.

**Data Protection Act 2018 (“DPA”) / European Union (Withdrawal) Act 2018
UK General Data Protection Regulation (“UK GDPR”)**

- 7.4. Together these set out the data protection principles and govern the processing of personal data in all formats. All personal data processed by or on behalf of the Council must comply with the six data protection principles; see **Appendix A: The Personal Data Protection Principles**.
- 7.5. Under UK GDPR Articles 13 and 14, individuals must be informed about how their data is used. Under Articles 15 to 22, data subjects have enforceable rights including subject access, rectification, erasure, restriction, objection, and rights relating to automated decision-making and data portability.
- 7.6. Processing must be based on one or more lawful bases and carried out fairly and transparently. Special category and criminal offence data require

additional conditions. See [Appendix B: Processing personal data](#) for the conditions around processing these categories of data.

- 7.7. Under Article 35 UK GDPR, the Council must carry out a Data Protection Impact Assessment (“DPIA”) before undertaking processing likely to result in high risk to individuals' rights and freedoms. This applies as part of the design and planning of new projects, policies, working practices, organisations, or other initiatives. See [Appendix C: Data Protection Impact Assessments](#) for further information on this process.
- 7.8. Under Article 28 UK GDPR, written contracts must be in place with all data processors, who may only be appointed where they can provide sufficient guarantees of compliance.
- 7.9. Under Articles 33 and 34 UK GDPR, personal data breaches likely to result in risk to individuals must be reported to the Information Commission within 72 hours. Where the risk is high, affected individuals must also be notified directly.

Data (Use and Access) Act 2025 (“DUAA”)

- 7.10. DUAA introduces new obligations including, at §103 (which inserts §164A into the DPA 2018), a statutory requirement for the Council to have a published data protection complaints procedure in place by 19 June 2026.

Freedom of Information Act 2000 (“FOIA”)

- 7.11. FOIA gives the public a right of access to recorded information held by public authorities, subject to defined exemptions. The Council must respond to requests within 20 working days and maintain and publish a model publication scheme.

Aarhus Convention

European Union (Withdrawal) Act 2018

Environmental Information Regulations 2004 (SI 2004/3391) (“EIRs”)

- 7.12. EIRs give the public a right of access to environmental information, with a stronger presumption in favour of disclosure than FOIA. Requests under the EIRs arise frequently across planning, environmental health, flood risk and waste services and are subject to the same 20 working day response obligation.

Communications Act 2003

Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426) (“PECR”)

- 7.13. PECRs govern the use of electronic communications for marketing purposes and the use of cookies and similar tracking technologies. PECRs apply (for example) to the Council's commercial operations and to any Council-operated digital platforms that use non-essential cookies.

Regulation of Investigatory Powers Act 2000 (“RIPA”)

Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699) (“LBPRs”)

- 7.14. RIPA governs the lawful interception of communications and the use of covert surveillance by public authorities. The Council operates closed-circuit television (“CCTV”) and may in certain circumstances conduct directed surveillance in the exercise of its enforcement functions. Any such activity must be authorised in accordance with RIPA and the Council's CCTV Code of Conduct.
- 7.15. The LBPRs permit limited interception of business communications (such as monitoring of staff emails or calls) for defined lawful business purposes, subject to appropriate notice to users. [it policies]
- 7.16. The Council shares CCTV footage to support law enforcement agencies. Any disclosure of CCTV evidence must be made in accordance with a formal Service Level Agreement in line with UK GDPR and must not on an *ad hoc* basis outside its terms.

8. Roles and responsibilities

- 8.1. **All Elected Members, officers, and any persons holding or processing personal data on behalf of the Council have a role in implementing this policy.**
- 8.2. To help employees comply, the Data Protection Officer provides training and guidance documents. Corporate Governance provides day-to-day support for the organisation.
- 8.3. An e-learning module, Data Protection Essentials, is available on the Council's learning management system and is mandatory for all staff. Employees should familiarise themselves with this Policy and guidance, complete training and apply the provisions in relation to any processing of personal data.
- 8.4. Failure to comply with this policy could amount to misconduct, which can be a disciplinary matter and could ultimately lead to the dismissal of staff. Serious breaches could also result in personal criminal liability.
- 8.5. This policy continues to apply to individuals even after their relationship with the Council ends.

There are some officers who take on statutory or key roles:

Data Protection Officer (“DPO”)

- 8.6. The DPO has a degree of autonomy within the Council, and is responsible for advising the Council, including its senior Officers and elected Members, of its obligations under the legislation. The DPO is designated based on professional qualities and expert knowledge of data protection law and practice.
- 8.7. The DPO monitors compliance, raises awareness, and ensures training for staff to enable them to lawfully comply with processing operations. The DPO is the contact point with the Information Commission in the event of potential data breaches and other relevant matters.
- 8.8. The Council must provide the DPO with the necessary resources, professional development and access to personal data and processing operations to allow them to perform their role and to maintain their expert knowledge of data protection law and practice.
- 8.9. The Corporate Governance Manager is designated as the DPO and works within the Chief of Staff Directorate of the Council. They are supported in

dealing with requests and queries from data subjects by the Information Governance Officer and the Corporate Governance service area.

- 8.10. Please contact the DPO if you have any concerns of deviation from this policy or from the relevant legislation (see contact details on page 18 below).

Senior Information Risk Officer (“SIRO”)

- 8.11. The Chief Executive and Head of Paid Service is designated as the Council's SIRO and is accountable for the Council's information risk management. The SIRO delegates operational responsibility for data protection compliance and information risk control to the Data Protection Officer, who acts with the SIRO's authority.
- 8.12. The SIRO receives escalated information risk reports from Information Asset Owners to ensure that information risk is visible and considered at Cabinet level.

Information Asset Owners (“IAOs”)

- 8.13. Each Assistant Director in the Council is an IAO, accountable for compliance with this policy for their respective Directorates and the maintenance of compliant records.
- 8.14. IAOs are also accountable for the management and timely disposal of records in compliance with published data retention schedules applicable to their Directorates and Service Areas.
- 8.15. IAOs report escalated information risks to the SIRO. They are supported day-to-day by Information Governance Leads within their teams.

Information Governance Leads (“IG Leads”)

- 8.16. IG Leads maintain heightened awareness of information governance matters above the mandatory baseline for all officers. They are operationally responsible for the duties of Information Asset Owners with their support and guidance and act as primary contacts for all requests as relevant to their respective teams.
- 8.17. IG Leads ensure operational compliance with this policy for their respective Directorates and are accountable for the maintenance of compliant Article 30 records of processing activity and information asset registers.

Information Governance Officer (“IGO”)

- 8.18. The IGO supports the Data Protection Officer in ensuring the Council is compliant with all relevant legislation and regulatory frameworks. They liaise with Directorates and Service Areas primarily via Information Governance Leads to ensure compliance. They are responsible for processing, recording and facilitating responses to requests and notifications under the relevant legislation, and liaising as necessary with the Information Commission.
- 8.19. Please contact the IGO in the first instance with questions about the operation of this policy or the relevant legislation (see contact details on page 18 below).

Information Commission (“Commission”)

Note: Under the Data (Use and Access) Act 2025, the Information Commissioner as a “corporation sole” will be replaced by an Information Commission constituted as a board with a non-executive chair. This change was imminent at the time of writing. This policy refers throughout to the Information Commission and should be read as referring to both terms.

- 8.20. As the independent regulator responsible for enforcing the relevant legislation, the Commission has broad investigatory and corrective powers. It can issue fines, enforcement notices and, in serious cases, prosecute individuals who commit criminal offences under the DPA 2018.
- 8.21. The Council is required to register with and pay the applicable fee to the Commission annually. Officers and Members must be aware that non-compliance may expose both the Council and individuals personally to regulatory action.
- 8.22. People who are unsatisfied with the Council’s responses to any data protection complaint or requests under the relevant legislation are entitled in law to escalate their issues to the Commission.

Web: ico.org.uk

Telephone: **0303 123 1113** (Mon to Fri 9am to 5pm)

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
(note: this office will relocate to Manchester in Autumn 2026)

9. Policy

Data protection principles

- 9.1. All personal data processed by or on behalf of the Council must comply with the six data protection principles set out in UK GDPR Article 5. See [The Personal Data Protection Principles](#)
- 9.2. for details of the principles.

Lawful basis for processing

- 9.3. Processing must be based on at least one lawful basis under UK GDPR Article 6.
- 9.4. Processing of special category data requires an additional condition under Article 9. Processing of criminal offence data requires an additional condition under Article 10 and, in most cases, Schedule 1 of the DPA 2018. Both the lawful basis and any additional condition must be identified and documented before processing commences.
- 9.5. See [Appendix B: Processing personal data](#) for details of the lawful bases and the additional conditions and schedules.

Data subject rights

- 9.6. The Council will facilitate all data subject rights under UK GDPR Articles 15 to 22, including subject access, rectification, erasure, restriction, objection, and rights in relation to automated decision-making and data portability.
- 9.7. Rights requests must be acknowledged promptly and responded to within one calendar month, extendable by two months for complex or numerous requests. Any extension or refusal must be reasoned and must inform the requestor of their right to complain.
- 9.8. For further guidance, contact the Information Governance Officer (see contact details on page 18 below).

Data protection complaints

- 9.9. The Council operates a published data protection complaints procedure in accordance with DPA 2018 §164A. A data protection complaint is any expression of dissatisfaction about how the Council has handled personal data; it does not need to reference legislation to qualify.

The Council will:

- acknowledge every complaint within 30 calendar days of receipt;
 - investigate without undue delay and keep the complainant informed;
 - communicate the outcome with reasons and advise the complainant of their right to escalate to the Information Commission; and
 - log all complaints centrally with clear ownership, outcomes, and learning actions.
- 9.10. Complaints may be submitted in any form. Complaints received through any channel are valid and must be escalated to the DPO without delay. See contact details below.
- 9.11. Individuals who remain dissatisfied after receiving the Council's outcome may refer their complaint to the Information Commission (see contact details on page 14 under roles and responsibilities).

Freedom of Information and Environmental Information requests

- 9.12. The Council will meet its obligations under FOIA and the EIRs to respond to all valid requests within 20 working days, subject to applicable exemptions and exceptions. See contact details on page 18 below.
- 9.13. Requests will be handled without knowledge of the applicant's identity or their purpose in seeking the information.
- 9.14. The Council will proactively publish disclosures and maintain its publication scheme in accordance with its publication scheme.

Information sharing

- 9.15. Personal data may only be shared with third parties where there are a lawful basis and a legitimate purpose. International transfers outside the UK require an adequacy decision, appropriate safeguards, or a recognised exception.

Confidentiality, security and potential data breaches

- 9.16. Officers and Members must not access, copy, alter, or disclose personal data except as authorised by their role and relevant legislation. The Council's ICT Security Policy applies to all electronic personal data.
- 9.17. A personal data breach is any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. On discovery of a potential breach, the reporting officer must notify the Corporate Governance team without delay via the incident form under 9.20 above. The Data Protection Officer or their nominated delegate will investigate the potential breach and assess severity.
- 9.18. Under UK GDPR Article 33, breaches likely to result in risk to individuals' rights and freedoms must be reported to the Information Commission within 72 hours. Under Article 34, where the risk is high, affected data subjects must also be notified directly.
- 9.19. All breaches will be logged and recommendations arising from investigations reported quarterly.
- 9.20. Suspected weaknesses or potential breaches must be reported without delay to the Corporate Governance team. Officers and elected Members should use the designated internal reporting eform. Members of the public should contact the Data Protection Officer or another Council officer who can pass the issue on (see contact details on page 18 below).

Information risk management and data protection impact assessments

- 9.21. Under UK GDPR Article 35, prior to commencing any processing likely to result in high risk to data subjects' rights and freedoms, a data protection impact assessment must be completed and reviewed by the Data Protection Officer.
- 9.22. Privacy by design must be embedded from the outset of any new project, system, or policy. Screening questions and templates are available to all officers. See [Appendix C: Data Protection Impact Assessments](#) for further information and guidance.

Article 30 records of processing activity and information asset registers

- 9.23. The Council maintains records of its processing activities as required by UK GDPR Article 30. Information Asset Owners are accountable for ensuring their respective Directorate's Article 30 records and information asset registers are accurate and current.
- 9.24. Records are operationally maintained by Information Governance Leads and reviewed in accordance with the timetable set by the Data Protection Officer.

Retention

- 9.25. Personal data is retained only for as long as necessary and in accordance with the Council's Data Retention Policy and accompanying data retention schedules.
- 9.26. The Council's privacy notices, published on its website, inform individuals of how their data is used and for how long.
- 9.27. See [section 15 Associated documents](#) for further information.

Contact details

- 9.28. The Data Protection Officer and Information Governance Officer can be reached using these contact details:

Borough Council of King's Lynn and West Norfolk
Kings Court, Chapel Street, King's Lynn PE30 1EX

Telephone: **01553 616200**

Email for freedom of information and environmental information requests:
freedom.information@west-norfolk.gov.uk

Email for all other information governance matters:
data.protection@west-norfolk.gov.uk

10. Governance arrangements and oversight

Performance reporting

- 10.1. The Data Protection Officer (DPO) will compile an annual performance report on Information Governance and Data Protection to the Council's Corporate Performance Panel. This will be alongside regular updates to the Council's Executive Leadership Team.

Designation of key personnel

- 10.2. The DPO role will normally be fulfilled by a suitably qualified member of the paid service as part of a wider remit. It will be the task of the supervising Assistant Director or Executive Leadership Team member to designate the DPO clearly in the relevant job description and to confirm the appropriate seniority for the post through the Council's job evaluation process.
- 10.3. The Data Protection Officer will identify and designate a Deputy Data Protection Officer (DDPO) to provide cover for leave and routine absences. The DDPO will be suitably trained to act on behalf of the DPO, with a route of escalation to the Senior Information Risk Officer (SIRO) or their nominated deputy.
- 10.4. Should the DPO be unavailable for an extended period, the SIRO will determine what contingency arrangements fit the circumstances.

Policy review mechanism

- 10.5. This policy will be reviewed every two years, or at the time of legislative or major organisational change, whichever is sooner.

11. Additional information, guidance, and resources

Guidance from the Information Commission

The Information Commission is the independent regulator responsible for enforcing relevant legislation around people's data rights in the United Kingdom. It has broad investigatory and corrective powers.

Its website gives a broad range of guidance for both individuals and organisations, as well as details of how to escalate issues to the Commission. ico.org.uk/for-the-public/

Information on the Council's website

The Council's web page on Data Protection gives information about our commitment and individuals' rights, as well as contact details and links to relevant request forms:

west-norfolk.gov.uk/info/20006/council_and_democracy/326/data_protection

The web page on Freedom of Information sets out our commitment to the legislative requirements, our publication scheme, how to seek an internal review of our response, and relevant contact details.

west-norfolk.gov.uk/info/20006/council_and_democracy/327/freedom_of_information

12. Health implications

- 12.1. No explicit health implications arise from this policy.

13. Environmental implications

- 13.1. No explicit environmental implications arise from this policy.

14. Equality, diversity and inclusion

- 14.1. The effects of this policy on protected characteristics defined in law, as well as further in the Council's policies, are neutral.
- 14.2. The small risk to equity of access to these provisions is mitigated through use of multiple channels (e.g. eforms, email, mail, phone, in-person appointments), plus use of translation services and supported guidance.

- 14.3. A pre-screening equalities impact assessment was included in the report submitting this policy to Cabinet (meeting date 9 June 2026 reference CAB12).

15. Associated documents

- 15.1. This policy is part of a suite of policies and procedures that should be used in conjunction with each other. Key linkages are with the following associated documents:

- Privacy Notice and associated departmental policies
west-norfolk.gov.uk/privacy
- Data Retention and Disposal Policy and departmental schedules
west-norfolk.gov.uk/downloads/download/820/data_retention_and_disposal_policies
- Freedom of Information Publication Scheme
west-norfolk.gov.uk/downloads/download/617/freedom_of_information
- ICT Security Policy (internal)
- ICT Computer Usage Policy (internal)

Appendix A: The Personal Data Protection Principles

UK GDPR Article 5 requires us to abide by a set of six data protection principles:

A1. Lawfulness, fairness and transparency

Processing must have a valid lawful basis; must not deceive or harm the data subject; and individuals must be informed about how their data is used in clear, accessible terms.

Example: A housing benefits team processes applicants' financial data under the lawful basis of legal obligation (Housing Benefit Regulations 2006). The service's privacy notice, published on the Council's website and available in the benefits office, sets out in plain English what data is collected, why, and how long it is kept.

A2. Purpose limitation

Data collected for one specified purpose must not be used for a different, incompatible purpose without a fresh lawful basis or the data subject's consent.

Example: Contact details collected by the Council's leisure centre for membership administration must not be passed to the planning department to consult residents on a nearby development without separate authority to do so.

A3. Data minimisation

Only data that is adequate, relevant, and limited to what is necessary for the purpose should be collected and held.

Example: An environmental health officer investigating a noise complaint needs the complainant's contact details and address, but not their date of birth, employment status, or other personal details that play no part in investigating the complaint.

A4. Accuracy

Personal data must be accurate and, where necessary, kept up to date. Inaccurate data must be corrected or erased without delay.

Example: A resident notifies the Council that they have moved house. The Council tax, housing register, and any other relevant service records must be updated promptly. Holding an old address across multiple systems risks incorrect billing, missed correspondence, and potential enforcement action against the wrong person.

A5. Storage limitation

Personal data must not be kept in a form that identifies individuals for longer than is necessary for the purpose for which it was collected.

Example: Planning application files contain personal data about applicants and objectors. Once an application is determined and any appeal period has elapsed, personal data that is no longer needed for legal or administrative purposes should be reviewed against the Council's Retention and Disposal Policy and disposed of securely, not retained indefinitely simply because storage is cheap.

A6. Integrity and confidentiality (security)

Personal data must be processed securely, with appropriate technical and organisational measures to protect against unauthorised or unlawful processing, and against accidental loss, destruction, or damage.

Example: A licensing officer emailing a list of personal licence holders to an external contractor must use secure transfer methods and must not send unencrypted personal data to a personal email address. Physical files containing enforcement records must be stored in locked cabinets and not left unattended in open-plan areas or vehicles.

A7. Accountability

A seventh overarching obligation, accountability, requires the Council to be able to demonstrate compliance with all the above principles. This is addressed through this policy, the Council's Article 30 records, staff training, DPIAs, and governance reporting arrangements.

Appendix B: Processing personal data

B1. Lawful bases for processing personal data

The basis for processing personal data must be lawful. At least one of the following bases under UK GDPR Article 6 must apply whenever the Council processes personal data:

- **Consent:** the individual has given clear consent for the Council to process their personal data for a specific purpose. Consent can be withdrawn at any time.
- **Contract:** the processing is necessary for a contract the Council has with the individual, or because they have asked the Council to take specific steps before entering a contract.
- **Legal obligation:** the processing is necessary for the Council to comply with the law.
- **Vital interests:** the processing is necessary to protect the vital interests of the data subject or another person.
- **Public task:** the processing is necessary for the Council to perform a task in the public interest or for its official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** note that this basis cannot be used for processing carried out by public authorities in the performance of their tasks.

B2. Appropriate policy document (DPA 2018 Schedule 1, Part 4)

The Data Protection Policy and this appendix to it serve as the Appropriate Policy Document (“APD”) for the purposes of Schedule 1, Part 4 of the Data Protection Act 2018. It is required where the Council processes special category data or criminal offence data under a Schedule 1 condition.

The Council's operational needs to process special category and criminal offence data are perpetual in nature. This Policy, including this Appendix, will be retained for as long as these processing activities continue and for a minimum of six months after any relevant processing activity permanently ceases. Superseded versions of this Policy will be retained for six months following replacement.

B3. Conditions for processing special category data

Special category (“SC”) data is personal data that warrants extra protection by reason of its sensitivity. Under UK GDPR Article 9, SC data comprises personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data processed to uniquely identify a person
- data concerning health
- data concerning a person's sex life
- data concerning a person's sexual orientation

To process special category data, the Council must identify and document both a lawful basis under Article 6 (above) and a separate condition under Article 9. The conditions under Article 9 are:

- Explicit consent of the data subject
- Necessary for employment, social security or social protection law (requires an APD and, in most cases, an Appropriate Policy Document condition under Schedule 1 DPA 2018)
- Necessary to protect the vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent
- Processing by a not-for-profit body in the course of its legitimate activities, relating only to members or former members or persons with regular contact with the body
- Personal data manifestly made public by the data subject
- Necessary for the establishment, exercise or defence of legal claims
- Necessary for reasons of substantial public interest (requires an APD)
- Necessary for preventative or occupational medicine, medical diagnosis, health or social care, or management of health or social care systems (requires an APD)
- Necessary for public health purposes (requires an APD)
- Necessary for archiving in the public interest, scientific or historical research, or statistical purposes (requires an APD)

A DPIA must be completed and documented where the processing of special category data is likely to result in high risk to data subjects.

B4. Conditions for processing criminal offence data

Criminal offence (“CO”) data is personal data relating to criminal convictions, offences, allegations, investigations, or proceedings, including unproven allegations, information relating to the absence of convictions, and data relating to victims and witnesses. It also covers related security measures: penalties, conditions or restrictions imposed as part of the criminal justice process, and civil measures which may lead to a criminal penalty.

To process criminal offence data, the Council must identify and document both a lawful basis under Article 6 and either official authority under Article 10, or a separate condition under Schedule 1 of the DPA 2018.

As a public authority, the Council must identify the specific statutory provision conferring official authority where it relies on that basis. Where official authority is not applicable, the relevant Schedule 1 condition must be identified. The Schedule 1 conditions most likely to be relevant to a district council include:

- Employment, social security, and social protection (para. 1)
- Health or social care purposes (para. 2)
- Public health (para. 3)
- Research (para. 4)
- Statutory and government purposes (para. 6)
- Administration of justice and parliamentary purposes (para. 7)
- Preventing or detecting unlawful acts (para. 10)
- Protecting the public against dishonesty (para. 11)
- Regulatory requirements relating to unlawful acts and dishonesty (para. 12)
- Preventing fraud (para. 14)
- Suspicion of terrorist financing or money laundering (para. 15)
- Safeguarding of children and individuals at risk (para. 18)
- Elected representatives responding to requests (para. 23)
- Disclosure to elected representatives (para. 24)
- Legal claims (para. 33)
- Insurance (para. 37)

A DPIA must be completed and documented where the processing of criminal offence data is likely to result in high risk to data subjects.

B5. How the Council secures compliance with the data protection principles when processing SC and CO data

Pursuant to Schedule 1, Part 4, paragraph 39(2)(a) of the DPA 2018, the Council applies the following measures when processing special category or criminal offence

data, in addition to its general compliance framework set out in this Policy and Appendix A:

- a) **Governance and authorisation.** Processing of SC or CO data must be documented in the relevant Directorate's Article 30 record before it commences. The lawful basis, Article 9 condition or Schedule 1 condition, and (where required) the Appropriate Policy Document condition must all be identified and recorded. Where a new processing activity is proposed, this must be approved by the IAO for the relevant Directorate and reviewed by the DPO.
- a) **Privacy by design and DPIAs.** Where proposed processing of SC or CO data is likely to result in high risk to data subjects' rights and freedoms: as is commonly the case given the sensitivity of these categories: a DPIA must be completed and signed off by the DPO before processing commences. See Appendix C.
- b) **Access controls.** Access to SC and CO data is restricted to officers with a legitimate need to process it in the performance of their duties. Access rights are managed through the Council's ICT systems and reviewed periodically. Physical files containing SC or CO data are stored securely and accessible only to authorised staff.
- c) **Staff training.** All officers are required to complete the mandatory data protection e-learning module, which covers the additional obligations applicable to SC and CO data. Officers in services that routinely process SC or CO data: including housing, environmental health, licensing, revenues and benefits, and HR: receive additional awareness as part of service induction and periodic briefing by IG Leads.
- d) **Data sharing.** SC and CO data is shared with third parties only where there is a clear lawful basis, a legitimate purpose, and (where required) a written data sharing agreement or data processing agreement. Disclosures are made only to those with a legal entitlement to receive the data. Ad hoc disclosures outside agreed frameworks are not permitted.
- e) **Minimisation and pseudonymisation.** The Council applies data minimisation to SC and CO data as a matter of course: only data that is necessary for the specific purpose is collected and retained. Where feasible, pseudonymisation or anonymisation techniques are applied, particularly in research, reporting, and analytical contexts.
- f) **Breach response.** Breaches involving SC or CO data are treated as higher priority in the Council's breach assessment process, given the greater

potential for harm to data subjects. The DPO will consider whether Information Commission notification and direct subject notification are required on the facts of each breach.

B6. Retention of special category and criminal offence data

This section satisfies the requirement under Schedule 1, Part 4, paragraph 39(2)(b) DPA 2018.

Personal data, including special category and criminal offence data, is retained only for as long as is necessary for the purpose for which it was collected. The Council's departmental retention schedules, published on the Council's website, are the authoritative source for retention periods and must be consulted by officers and IG Leads in respect of specific record types.

The following sets out the Council's principal processing activities involving SC or CO data and the schedule in which the applicable retention periods are found.

Special category data

Processing activity	Data types	Schedule and reference
Housing options, homelessness assessment and prevention	Health and medical information, vulnerability and occupational support needs assessments, carer information, MARAC and MAPPA information	HWPP4.1.1 HWPP4.1.2
Housing standards enforcement, disrepair, harassment and illegal eviction, housing assistance and grants	Health and medical information	HWPP4.2.1 HWPP4.2.2 HWPP4.2.7
Unauthorised encampments	Health and medical information	HWPP4.2.5
Care and Repair: Disabled Facilities Grants and Handy Person Scheme	Health and medical information	HWPP2.1.1 HWPP2.1.2
Careline Community Alarm and associated services	Health and vulnerability data	HWPP3.1.1
Environmental health: accidents and injuries involving adults	Health data	HWPP6.5.1
Environmental health: accidents and injuries involving children	Health data	HWPP6.5.2

Processing activity	Data types	Schedule and reference
Benefits assessment, payment and fraud investigation	Medical forms, health and financial vulnerability data	R2.1.1 to R2.1.13
Personnel and payroll: all employees	Health and medical information, trade union membership, occupational health, DBS records, equality monitoring, safeguarding referrals	CS5.1 to CS5.13
Licensing: hackney carriage, private hire drivers and operators	Medical information, right to work	CE4.1.9 CE4.2.1 CE4.2.2
Standards: investigation of complaints about conduct of councillors	Personal appearance and behaviour, political affiliation and opinions, health information	CE3.10.1
Customer Information Centre data collection for housing, care, licensing and community safety services	Health and financial data	CS2.1.3 to CS2.1.8
Communications: photographs	Images of identifiable individuals	CS1.1.2

Criminal offence data

At the time of writing (April 2026), the Council's departmental retention schedules do not systematically distinguish criminal offence data as a distinct category. The schedules address records that contain CO data, including community safety, enforcement, prosecution, licensing and fraud investigation records. However, these are treated within a general framework that does not explicitly engage with the additional requirements applicable to CO data under UK GDPR Article 10 and Schedule 1 DPA 2018.

This is a known gap to be addressed as part of the planned review of the Data Retention Policy and departmental schedules. In the interim, the following schedule entries cover the record types most likely to contain CO data:

Processing activity	Data types	Schedule and reference
Community safety, ASB case management, waste enforcement, service of notices, prosecution of cases, injunctions and other ASB interventions	Criminal records, offence and conviction data, case evidence	HWPP1.1.1 to HWPP1.1.7
Unauthorised encampments	Criminal records	HWPP4.2.5

Processing activity	Data types	Schedule and reference
Health and safety enforcement notices	Offence and prosecution data	HWPP6.1.1
Benefits fraud investigation: no fraud established or no further action	Investigation records, interview records	R2.1.8 R2.1.9
Benefits fraud investigation: sanction applied (caution, administrative penalty or prosecution)	Conviction and sanction data, interview records	R2.1.10
Benefits fraud investigation: prosecution resulting in acquittal	Offence and acquittal data, evidence	R2.1.11
Benefits fraud: QB50 notebooks	Investigation notes	R2.1.12
Internal audit: investigation resulting in caution	Offence and caution data	R3.1.8
Internal audit: investigation resulting in administrative penalty	Penalty and offence data	R3.1.9
Internal audit: investigation resulting in prosecution	Conviction data	R3.1.10
Internal audit: RIPA surveillance records	Surveillance and intelligence data	R3.1.12
Licensing: hackney carriage, private hire drivers and operators (refusals, revocations and suspensions)	Criminal record data, conviction history	CE4.1.9 CE4.2.1 CE4.2.2
Licensing: licensing hearings generally	Convictions, criminal background data	CS4.3.8
RIPA authorisations: revenues and benefits	Surveillance records	R2.1.2
RIPA authorisations: legal	Surveillance records, observation logs, authorisations	CE3.5.1
Standards: investigation of complaints about conduct of councillors	Offences, alleged offences	CE3.10.1

General principles

Regardless of the specific period applicable to a record type, SC and CO data must be reviewed at the end of the applicable retention period and erased promptly unless a statutory obligation, legal proceedings, or a legitimate operational need requires continued retention. Erasure must be carried out securely in accordance with the Council's Data Retention Policy. IAOs are accountable for ensuring their Directorate's schedules adequately address SC and CO data as distinct categories and must treat any unresolved or outstanding schedule entries as an open compliance risk requiring prompt resolution.

Appendix C: Data Protection Impact Assessments

C1. Introduction

Under GDPR, there is an obligation for organisations, in their role as data controllers, to conduct a data protection impact assessment (“**DPIA**”) before undertaking any processing that presents a specific privacy risk by virtue of its nature, scope or purpose.

Article 35 of GDPR introduces the formal requirement for a DPIA and it can best be described as a type of risk assessment which is carried out prior to a new processing activity, to highlight the viability of carrying out such a process and identifying any risks that may be associated with the processing.

C2. When is a DPIA required?

Article 35 sets out the circumstances where a DPIA is required and states:

“Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. A single assessment may address a set of similar processing operations that present similar high risks.”

Although GDPR does not specifically state what must be covered by a DPIA, Article 35(7) sets out the following minimum requirements that should be considered:

- A systematic description of the proposed processing operations
- The purposes of the processing
- The legitimate interest pursued by the controller
- An assessment of the necessity and proportionality of the processing operations in relation to the purposes.
- An assessment of the risks to the rights and freedoms of data subjects
- The measures envisaged to address the risks, including appropriate: safeguards, security measures and mechanisms to ensure the protection of personal data and to demonstrate compliance considering the rights and legitimate interests of data subjects and other persons concerned.

C3. When is a DPIA not required?

The GDPR doesn’t specifically state when a DPIA is not required, but there is significant guidance which can be relied upon when deciding whether a DPIA is

required or not. From this guidance several circumstances have been identified where a DPIA is not required. These are:

- Where processing is low risk (i.e. not likely to result in a high risk to the rights and freedoms of natural persons).
- Where a DPIA has already been carried out and the nature, scope, context, and purposes of the processing are very similar to the proposed processing.
- Where a processing operation has a legal basis in EU or Member State law and has stated that an initial DPIA does not have to be carried out, where the law regulates the specific processing operation and where a DPIA, according to the standards of the GDPR, has already been carried out as part of the establishment of that legal basis.
- Where the processing is included on the optional list (established by the INFORMATION COMMISSION) of processing operations for which no DPIA is required

The Information Commission publishes a useful guide on Data Protection Impact Assessments on its website:

ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/data-protection-impact-assessments-dpias/

Templates and screening questions to ascertain the need for a DPIA are published for staff on the Council's intranet. The screening questions are based on Information Commission guidance.

C4. Action Plan

These are a few points that you should consider when looking at DPIAs and whether you feel it is necessary to carry out an assessment:

- Be aware of the data you / your department processes and regularly assess whether this is due to change.
- If your department has been tasked with a new exercise, go through the screening questions on the template DPIA to determine whether you need to carry out the assessment.
- Look for any potential risk factors associated with the data you process and determine whether an assessment is needed.

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



REPORT TO CABINET

DATE OF MEETING	9 TH June 2026
REPORT TITLE	West Norfolk Economic Strategy – Action Plan 2026-2028
LEAD MEMBER	Cllr Simon Ring E-mail: cllr.Simon.Ring@West-Norfolk.gov.uk
LEAD OFFICER	Lead Officer: Jemma Curtis E-mail: jemma.curtis@west-norfolk.gov.uk
CONSULTEES	Internal departments including: <ul style="list-style-type: none"> • Economic Development and Regeneration • Planning and Housing • Climate Change and Environment • Public Health and Community Services
WARDS AFFECTED	ALL WARDS

KEY DECISION	NO
DECISION MAKER	Cabinet
IS THE REPORT OPEN OR EXEMPT	OPEN

FINANCIAL IMPLICATIONS	NO
HR IMPLICATIONS	NO
POLICY IMPLICATIONS	YES
STATUTORY IMPLICATIONS	NO
RISK MANAGEMENT IMPLICATIONS	YES
ENVIRONMENTAL IMPLICATIONS	YES
EQUALITY IMPACT ASSESSMENT COMPLETED	PRE-SCREEN HAS BEEN COMPLETED.

SUMMARY OF REPORT

The West Norfolk Economic Strategy (WNES) Action Plan 2026 -2028 sets out a focused programme of activity to deliver the priorities of the adopted West Norfolk Economic Strategy. The Action Plan translates the long-term economic vision approved by Cabinet in 2026, into a practical, time-bound set of interventions that can be delivered over the next two years, whilst laying the foundations for continued delivery beyond 2028 as part of Local Government Reorganisation.

The Action Plan is structured around the five strategic priorities from the WNES:

1. Thriving Towns
2. Access to Education & Good Work
3. Productive Jobs and Businesses
4. Managed Natural Resources

5. Healthy, Inclusive Communities

Together, these priorities respond to national policy changes, emerging local government reorganisation and devolved governance arrangements and local challenges and opportunities including productivity, skills, health inequalities town centre regeneration, climate resilience and inclusive economic growth.

The Action Plan is designed to be dynamic and will be reviewed annually. Importantly, the Action Plan also provides a shared framework for engagement with key public, private and third-sector stakeholders. It sets out a clear, place-based set of priorities and pipelines of activity that partners can align with when developing projects, seeking investment and bidding for external funding. By clearly articulating West Norfolk's economic priorities and delivery approach, the Action Plan supports coordinated partnership working and strengthens the Borough's collective ability to attract funding from government, devolved bodies and other external sources. It aligns closely with the Council's Corporate Strategy and Corporate Action Plan and supports delivery of wider place-based programmes including Pride in Place, devolution readiness, the Marmot programme and the Climate Change Strategy.

Importantly, the Action Plan delivers borough-wide benefits across both urban and rural communities. It recognises that West Norfolk's economy is highly dispersed, with a significant proportion of residents and businesses located in rural and coastal areas. Through improved transport connectivity, digital infrastructure, access to skills and training, and investment in local services and visitor economy assets, the Action Plan supports rural residents and businesses to access employment, education and leisure opportunities. This ensures that economic growth is inclusive and felt across villages, market towns and coastal communities, not solely within King's Lynn.

RECOMMENDATIONS

Recommendation to Cabinet

That Cabinet approve the West Norfolk Economic Strategy Action Plan 2026 – 2028.

REASON FOR DECISION

To provide a clear, coordinated and deliverable framework for implementing the West Norfolk Economic Strategy, informing the Council's resources and service plans alongside that of external partner to ensure that we deliver against the economic growth vision and priorities previously approved, that aligns with corporate, local and national priorities.

CORPORATE STRATEGY

How does this proposal support our Corporate Priorities [Our priorities | Corporate Strategy 2023 - 2027 | Borough Council of King's Lynn & West Norfolk](#)

Promote growth and prosperity to benefit West Norfolk

The Action Plan provides a clear, deliverable framework to drive inclusive economic growth across borough through town-centre regeneration, business growth skills

	development and inward investment. It aligns local priorities with national policy and devolution opportunities, helping to ensure that economic growth supports residents, businesses and places across West Norfolk.
Protect our Environment	The Action Plan supports environmentally sustainable growth through its Managed Natural Resources priority and alignment with the Climate Change Strategy. It promotes low-carbon infrastructure, climate resilience, sustainable transport and responsible use of natural assets, ensuring that economic growth is balanced with long-term environmental protection.
Efficient and effective delivery of our services	The Action Plan provides a coordinated approach that aligns activity across Council services and with external partners, helping to maximise value for money and avoid duplication. Clear priorities, delivery arrangements and monitoring support effective decision-making and efficient use of resources, including readiness for future governance and funding changes.
Support our communities	The Action Plan places communities at the centre of economic growth, with a strong focus on inclusive growth, reducing inequalities and improving health and wellbeing. It is closely aligned with the Council's Marmot programme, addressing the wider social determinants of health such as employment, skills, housing, transport and access to services. By embedding Marmot principles across delivery, the Action Plan seeks to improve life chances, reduce health inequalities and support stronger, healthier and more resilient communities across West Norfolk.

REPORT DETAIL

1. Introduction

During 2024, the Council developed the WNES to set out a 20-year vision for supporting economic growth of the borough, to identify the priorities and investment required ahead of planned devolution. This strategy was adopted by Cabinet in early 2025 with a view to bring back a detailed action plan to provide a clear way forward for delivery of the strategy.

2. Background

The WNES was designed to provide a long-term vision for growth and prosperity across the borough. The Action Plan for the period 2026-8 supports this vision by identifying priority actions that can be delivered in the short to medium term, responding to changing economic circumstances, policy reforms and funding opportunities.

Since adoption of the Economic Strategy, there have been significant changes in the national policy landscape, including a change in national government, planned reforms to local government, devolution, planning, skills and industrial policy. The Action Plan responds to these changes and positions the Borough Council to

maximise emerging opportunities, particularly in advance of the creation of the West Norfolk Council as part of Local Government Reorganisation.

The Action Plan has been developed in collaboration with internal services and external stakeholders and integrates existing programmes where there are shared aims and objectives, for example the Marmot programme.

3. Proposal

The proposal is for Cabinet to approve the West Norfolk Economic Strategy Action Plan 2026–2028. The Action Plan provides a focused, time limited framework for delivering the priorities of the adopted Economic Strategy, translating long-term ambitions into a practical programme of actions that can be delivered over the next two years. It brings together activity across regeneration, skills, business growth, environment and healthy communities, and prepares West Norfolk for anticipated Local Government Reorganisation in 2028 by putting key priorities, partnerships and investment pipelines in place ahead of structural change. It identifies the specific projects and workstreams that relevant council services and resources will prioritise for delivery to support the achievement of WNES aims and objectives.

The Action Plan has been intentionally scoped to be achievable within the two-year period, focusing on a prioritised and deliverable set of actions rather than an exhaustive programme. It builds on existing programmes, committed resources and established partnerships, ensuring that activity can be progressed at pace without requiring significant new infrastructure or capacity. The emphasis over the 2026–2028 period is on progressing priority interventions, developing investable project pipelines and securing external funding, rather than completing all long-term outcomes within this timeframe. This approach ensures that the Action Plan is realistic, deliverable and capable of demonstrating early progress while laying the foundations for longer-term impact.

The Action Plan recognises that the Council cannot deliver these ambitions in isolation and that success will depend on strong collaboration with a wide range of public, private and voluntary sector stakeholders. This includes partners such as education and skills providers, health partners, community and voluntary organisations, landowners and developers, business representative bodies and infrastructure providers.

The Action Plan has therefore been developed in consultation with key stakeholders who have a pivotal role in delivering many of the interventions identified under each strategic priority. By clearly setting out agreed priorities, geographies and intended outcomes, the Action Plan provides confidence to partners that their activity aligns with the Council's strategic direction and investment focus.

Crucially, the Action Plan also acts as an enabling tool for stakeholders to explore, shape and unlock further funding opportunities. It provides a robust strategic framework that can be referenced within funding bids, business cases and partnership proposals, helping stakeholders demonstrate strategic fit with local priorities, corporate objectives and national policy. This shared framework

strengthens the quality and credibility of funding submissions and supports a coordinated approach to securing investment into West Norfolk.

3.1 Stakeholder and Funding Context

The Action Plan has been intentionally designed to support investment readiness and funding mobilisation across West Norfolk. It provides a clear articulation of economic challenges, priorities and proposed interventions that stakeholders can use as a strategic foundation when developing projects and seeking funding.

For external partners, the Action Plan offers:

- A clear statement of place-based economic priorities across towns and communities;
- A pipeline of priority themes and interventions aligned to national policy objectives such as productivity, skills, inclusive growth, health and climate resilience;
- Strategic alignment with the Council's Corporate Strategy, Marmot programme and Climate Change Strategy, which are increasingly required within funding assessment criteria.

This enables stakeholders to use the Action Plan as supporting evidence when bidding for government funding, devolved funding, charitable or private investment. It also allows the Council and its partners to present a coherent and coordinated narrative to funders, demonstrating that individual projects form part of a wider, agreed programme of economic renewal.

As funding opportunities emerge through devolution, Local Government Reorganisation and future national programmes, the Action Plan will provide a flexible framework through which projects can be prioritised, developed and brought forward with clear strategic rationale and partnership backing.

It is expected that many of the projects and partnerships initiated through this Action Plan will extend beyond 2028 and inform early delivery under new unitary arrangements.

3.1 Rural and Coastal Economy

West Norfolk has a large and diverse rural economy, including agri-food, tourism, small businesses and home-based enterprises, alongside dispersed communities with differing levels of access to services and employment. The Action Plan recognises that economic participation in rural areas is often shaped by connectivity, transport, digital access and proximity to services.

As such, the Action Plan includes targeted interventions to:

- Improve physical connectivity to employment, training and services
- Expand digital infrastructure, particularly in rural not-spots
- Support rural enterprise and micro-business growth, including home-based and agricultural diversification
- Strengthen the visitor economy across coastal and countryside locations
- Improve access to skills, education and lifelong learning for residents outside main urban centres

This ensures that rural areas are not only supported but act as active contributors to the borough's overall economic growth.

4. Options Considered

Option 1 – Approve the Economic Strategy Action Plan 2026–2028 (Preferred option)

This option provides clarity, direction and momentum for economic delivery during a period of change. It enables the Council and its partners to progress priority actions now, ensures alignment with corporate priorities and the Marmot programme, and positions West Norfolk strongly ahead of Local Government Reorganisation. The Action Plan is flexible, proportionate and capable of being adapted by successor authorities.

Option 2 – Do nothing / delay approval

Under this option, no Action Plan would be in place. This would risk a loss of momentum, reduced coordination across services and partners, and missed opportunities to prepare West Norfolk for future governance and funding arrangements. It would also weaken the Council's ability to clearly articulate local economic priorities during a critical transition period.

Option 3 – Develop a longer-term or more detailed strategy instead

Producing a new long-term strategy or more detailed plan at this stage would require additional time and resources and may quickly become outdated due to Local Government Reorganisation. This approach would risk delaying delivery and would not provide the practical, near-term focus required to support current programmes and investment readiness.

5. Financial Implications

The Action Plan will be delivered through a combination of:

- Existing Council budgets and officer resources
- External grant funding (including Pride in Place and other government programmes).
- Partner investment and private sector funding

Individual projects and initiatives will be subject to separate governance, business cases and financial approvals in line with the Borough Council's financial procedures.

6. HR Implications

Delivery will be supported by existing officer capacity, with additional requirements addressed through external funding, programme specific bids or partnership arrangements where necessary.

7. Policy Implications

The Action Plan directly supports delivery of the Council's Corporate Strategy, Corporate Action Plan and wider policy commitments, including inclusive growth, economic resilience, climate action and place-based regeneration.

It provides a clear economic framework to support decision-making across planning, regeneration, skills, housing transport and environmental initiatives.

8. Climate Change and Environmental Implications and considerations

The Action Plan supports environmentally sustainable growth, particularly through the Managed Natural Resource strategic priority, alignment with the Climate Change Strategy and the promotion of low-carbon, resilient infrastructure and development.

9. Statutory and Legal Implications

None. There is no statutory requirement to produce an Economic Strategy Action Plan. However, the Action Plan supports delivery statutory responsibilities across planning, economic development, housing and environmental management.

10. Local Government Reorganisation Implications

The Action Plan has been developed in the context of anticipated Local Government Reorganisation in Norfolk from 2028. It is intentionally time limited to prepare West Norfolk for this transition by putting key economic priorities, partnerships and investment pipelines in place ahead of structural change. This approach helps maintain delivery momentum, ensures West Norfolk's priorities are clearly defined and investment-ready, and supports continuity as new unitary arrangements are established.

The Action Plan has been developed in the context of anticipated Local Government Reorganisation in Norfolk from 2028. It is intentionally time limited to the period 2026–2028 to provide clarity, focus and deliverability during a period of transition.

This approach enables the Council and its partners to establish clear economic priorities, strengthen partnerships and develop a robust pipeline of investable projects ahead of structural change. These elements are critical in ensuring that West Norfolk is well positioned to influence and shape the economic agenda of the future unitary authority.

Whilst the Action Plan does not formally extend beyond 2028, it is designed to provide a strong evidence base and delivery framework that can inform the first phase of the successor authority. The projects, partnerships and investment pipelines developed through this Action Plan are expected to continue into the early

years of the new unitary arrangements, providing continuity and supporting a seamless transition in economic delivery.

11. Health and Safety Implications

None. Where required, appropriate health and safety assessments will be undertaken at project level prior to implementation.

12. Consultees

The Action Plan has been developed through close collaboration and informal consultations across Council services, including:

- Economic Development and Regeneration
- Planning and Housing
- Climate Change and Environment
- Public Health and Community Services

Any Statutory Consultees

There are no statutory consultation requirements associated with the approval of an Economic Strategy Action Plan. Statutory consultation will be undertaken where required for individual projects, planning processes or funding programmes arising from the Action Plan.

Other departments of the Council

The Action Plan has been developed through close collaboration across Council services, including:

- Economic Development and Regeneration
- Planning and Housing
- Climate Change and Environment
- Public Health and Community Services

Internal consultation has ensured that actions are deliverable, aligned with existing programmes and resources, and consistent with corporate governance, financial and risk management frameworks.

13. Equality Impact Assessment

The Economic Strategy Action Plan is expected to have positive equalities impacts by promoting inclusive growth, improving access to education, skills and employment, and supporting regeneration and investment in communities facing the greatest socio-economic challenges.

Delivery of the Action Plan is closely aligned with the Council's Marmot programme and its focus on addressing the wider social determinants of health, including employment, skills, housing, transport and access to services. By embedding

Marmot principles across the Healthy, Inclusive Communities priority and other strategic priorities, the Action Plan seeks to reduce health and economic inequalities and improve outcomes for disadvantaged groups and neighbourhoods.

Equality considerations will continue to be embedded in the design and delivery of individual projects, with more detailed Equality Impact Assessments undertaken where required as part of specific programme or funding approvals.

14. Risk Management Implications

Key risks include funding availability, delivery capacity, and changes to national policy or governance arrangements.

These risks will be managed through phased delivery, partnership working, annual review of the Action Plan and integration with the Council's corporate risk management framework.

The risk of over commitment within the two-year timeframe is mitigated through prioritisation, phased delivery and alignment with existing programmes and resources.

15. Conclusion

The Economic Strategy Action Plan 2026–2028 sets out a clear and deliverable framework to implement the Council's economic priorities over the next two years, bringing together regeneration, skills, productivity, environmental sustainability and health and wellbeing into a coordinated programme of action. It supports inclusive growth through alignment with the Corporate Strategy, the Marmot programme and the Climate Change Strategy. The Action Plan is intentionally time-limited to maintain momentum while preparing West Norfolk for anticipated Local Government Reorganisation in 2028. Cabinet approval will provide clarity and continuity, ensuring West Norfolk is well positioned ahead of future structural and governance changes.

Crucially, the Action Plan ensures that economic growth is balanced across the borough, with targeted actions that address the specific challenges and opportunities of rural and coastal communities alongside those of King's Lynn.

The two-year timeframe is intentionally focused to ensure deliverability and momentum, with an emphasis on progressing priority actions and establishing a strong pipeline for continued delivery beyond 2028.

LIST OF APPENDICES

West Norfolk Economic Strategy 2024

LIST OF BACKGROUND PAPERS

West Norfolk Economic Strategy 2024. Link here: West Norfolk economic strategy West Norfolk economic strategy Borough Council of King's Lynn & West Norfolk

PRE SCREENING EQUALITY IMPACT ASSESSMENT

For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function: West Norfolk Economic Strategy Action Plan 2026–2028.

Is this a new or existing policy/ service/function? (tick as appropriate)

New		Existing	<input checked="" type="checkbox"/>
-----	--	----------	-------------------------------------

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, and identify relevant legislation.

The Economic Strategy Action Plan 2026–2028 sets out the Council’s priority actions to deliver inclusive, sustainable economic growth across West Norfolk. It focuses on town-centre regeneration, skills and employment pathways, business growth and productivity, managed natural resources, and healthy, inclusive communities. The Action Plan translates the adopted Economic Strategy into a time limited, delivery-focused programme aligned with corporate priorities, the Marmot programme, climate objectives and the upcoming Local Government Reorganisation in 2028.

Who has been consulted as part of the development of the policy/service/function? – new only (identify stakeholders consulted with)

There is no statutory requirement to produce an Economic Strategy Action Plan. However, the Action Plan supports delivery of statutory functions across planning, economic development, housing, environmental management and public health, and operates within relevant legislative frameworks.

Question Answer

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? Please tick the relevant box for each group.	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	
Armed forces community	x			
Care leavers	x			
Health inequalities*	x			

<p>NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p> <p><i>*For more information on health inequalities please visit The King's Fund</i></p>	<p>Other (eg low income, caring responsibilities)</p>				
<p>Please provide a brief explanation of the answers above:</p> <p>The Economic Strategy Action Plan is expected to have overall positive equality impacts, particularly for groups experiencing disadvantage or poorer outcomes.</p> <p>Positive impacts are anticipated for:</p> <p>Age: Through skills pathways, employment access for young people and opportunities for older workers to remain economically active.</p> <p>Disability: Via inclusive employment initiatives, accessible town-centre regeneration and improved access to services and opportunities.</p> <p>Race and low-income groups: Through targeted regeneration, skills and employment support in areas of higher deprivation.</p> <p>Armed forces community and care leavers: By improving access to skills, employment pathways and support services.</p> <p>Health inequalities: The Action Plan is closely aligned with the Council's Marmot programme, addressing the wider social determinants of health such as employment, skills, housing, transport and access to services. This is expected to contribute to reducing health inequalities and improving life chances across the borough.</p> <p>No negative impacts have been identified here.</p>					
<p>Question</p>	<p>Answer</p>	<p>Comments</p>			
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	<p>No</p>	<p>N/A</p>			
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	<p>No</p>	<p>N/A</p>			

If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:

Decision agreed by EWG member:N/A.....

<p>4. 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</p>	No	<p>Actions: N/A</p>		
<p>5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>		No	<p>Please provide brief summary: N/A</p>	
<p>Assessment completed by:</p>	Walton Mabuto			
<p>Job title</p>	Economic Growth Officer			
<p>Date completed</p>	29/04/2026/			
<p>Reviewed by EWG member</p>	Ashley Easter, Louise Gayton & Allison Bingham	<p>Date</p>	28/04/2026/	
<p>✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)</p>				

Revision 7



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West Norfolk Economic Strategy

ACTION PLAN 2026-28

Borough Council of
King's Lynn &
West Norfolk



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FOREWORD

Delivery of West Norfolk's economic growth strategy is focused on a short-term action plan linked to the strategic priorities identified within the West Norfolk Economic Strategy. In alignment with the strategy, this action plan is intended to be dynamic to react to changing economic circumstances and flexible to capitalise on emerging opportunities. To track progress, impact monitoring and evaluation will be undertaken using both overarching economic metric key performance indicators (which have been developed with strategic partners).

The economic monitoring metrics have been identified will use data to track the direction of travel and performance versus comparators. These metrics will be reviewed and updated when and where required. Progress updates will be reported back to stakeholders annually via reports, presentations, info graphics and case studies where appropriate.

Executive Summary

The Action Plan 2026-28 towards delivery of the West Norfolk Economic Strategy (WNES) is focused on the strategic priorities we have immediate opportunity to progress and implement during this period, laying the groundworks towards further actions and delivery from 2028 onwards. The action plan is intended to be dynamic in order to react to changing political and economic circumstances and flexible enough to capitalise on emerging opportunities. The action plan will be reviewed annually and amended as appropriate, both in terms of composition and delivery timescales. The actions build on existing activity, whilst at the same time introducing new interventions that can be levers to capitalise on opportunities and challenges that were identified in the original WNES. This action plan encompasses the priorities and actions for the Borough Council, partners, private sector and other government agencies to apply resources to collectively achieve the wider outcomes set out in the strategy.

In 2045 King's Lynn and West Norfolk is a model for sustainable, active and inclusive rural communities, where the benefits of economic growth are shared widely, and natural and cultural heritage is preserved, enhanced and celebrated for future generations.

King's Lynn and West Norfolk will be a vibrant economy, characterised by:



Thriving, connected towns that are destinations for both residents and tourists



Access to education and good work, at all phases of life



Specialised agri-food, engineering, waste & water and visitor economy sectors, with productive jobs and businesses that are a reason to stay in the area, re-locate to it and invest in it



Proactive, efficient and sustainable management of our natural resources



Happy, healthy people living in inclusive, connected communities with access to housing, health services, social and leisure facilities

Context Driving Action

The national, regional and local policy context forms the backdrop for the decisions that have been made in developing the West Norfolk Economic Strategy (WNES) Action Plan. These factors significantly influence how deliverable the strategic priorities identified in the Economic Strategy locally and require a continued focus on partnership working to ensure that this strategy is aligned to King's Lynn and West Norfolk priorities and maximises funding opportunities that arise.

National and regional drivers

Since the creation of the WNES during 2024, there has been a significant change in national policy frameworks following the change in government; this provides an opportunity to align the local priorities in the WNES with national policy as a route to reinforce delivery. This includes the;

English Devolution and Community Empowerment Bill¹ Through devolution deals, simplified funding settlements and control of some existing budgets are being passed down to areas adopting mayoral governance structures. This will see the creation of the Norfolk & Suffolk Mayoral Combined Authority (NSMCA) from May 2028. For West Norfolk specifically, the NSMCA framework strengthens the strategic landscape by enabling more coherent, cross-county decision-making and a unified approach to economic development and regeneration, which the WNES is best placed to respond effectively to. Local priorities including unlocking employment and housing sites, improving transport connectivity, and scaling skills provision are all identified as target areas for devolved investment and powers. The devolution agenda represents a major shift in how national funds flow into Norfolk and Suffolk, with the potential for enhanced investment certainty and improved alignment between local government structures and economic planning. This creates an enabling environment for the delivery of the West Norfolk Economic Strategy. And as a result, the Action Plan focuses on aligning our priorities with the opportunities that will emerge through the first investment plan phase of the NSMCA when created, to ensure we are well positioned to maximise investment and long-term economic impact.

The **Industrial Strategy's²** focus on long term productivity, frontier sectors and place-based growth creates a natural environment in which West Norfolk can position its priority sectors clean energy, agri-food and advanced manufacturing, among others within wider national missions improving access to investment and support.

¹ [English Devolution and Community Empowerment Bill - Parliamentary Bills - UK Parliament](#)

² [The UK's Modern Industrial Strategy – local authority policy announcements | Local Government Association](#)

Meanwhile, LSIPs strengthen the local supply of skills by aligning post-16 education and training with employer demand, ensuring the workforce is better matched to the needs of local industries and growth-enhancing sectors. LSIPs enable greater collaboration between national and local authorities to address skills shortages and economic development priorities. This sits alongside the UK Government's wider Post-16 Skills policy, which focuses on improving technical education, expanding apprenticeships, and ensuring colleges and training providers work more closely with employers to deliver the skills needed for modern industries³. Together, these frameworks ensure local actions sit within a coherent national economic storyline.

NHS 10 Year Plan & New Hospital Programme

The Fit for the Future: 10-Year Health Plan for England⁴ acts as a major national driver for West Norfolk's Healthy & Inclusive Communities priority by setting a clear mandate for a shift from hospital-centric care to neighbourhood-based, preventative, digitally enabled health systems. The Plan directly targets the kinds of rural, coastal and deprived communities found in West Norfolk, prioritising areas with low healthy life expectancy, expanding community health infrastructure, and tackling inequalities through integrated neighbourhood teams, expanded prevention support, and personalised care planning. Its focus on prevention, early intervention, digital inclusion and collaboration between NHS, local government and employers strongly aligns with local goals to reduce long-term health conditions, improve access, and strengthen community wellbeing. Crucially, the Plan frames health as an economic mission, linking improved population health to reduced economic inactivity, higher productivity and stronger labour market participation directly reinforcing West Norfolk's strategy to build healthier, more resilient and economically active communities.

Pride in Place⁵

The Pride in Place Programme provides up to £20 million over ten years for King's Lynn, with a strong focus on creating thriving town centres, stronger communities, and better local opportunities beginning in 2026. Early investment priorities include Riverfront Regeneration Phase II and the St George's Guildhall & Creative Hub; both identified in the approved Ten-Year Vision and four-year Investment Plan as cornerstone projects for revitalising the town. These schemes are intended to strengthen King's Lynn's cultural offer, unlock more activity along the historic waterfront, and improve the town's attractiveness for residents, visitors, and businesses. Given that 75% of Pride in Place funding must be spent on capital projects, these two major place-making interventions sit firmly at the heart of the programme's aims to create a more vibrant, prosperous, and inclusive town.

³ [Post-16 education and skills white paper - GOV.UK](#)

⁴ [NHS England » Fit for the Future: 10 Year Health Plan for England](#)

⁵ [Pride in Place Strategy - GOV.UK](#)

Local drivers

Locally, three key policy contexts drive this Economic Strategy Action Plan. Firstly, the BCKLWN Corporate Strategy (2023 – 2027)⁶. This provides the strategic framework for action by the BCKLWN to deliver the ambition of making King’s Lynn & West Norfolk a thriving borough and improving the lives of local people. It focuses on where the council can make a real difference in accelerating economic growth and ensuring places, people and businesses benefit from the new economic opportunities which are created. Secondly, the Borough Council’s Corporate Action Plan 2025 – 2027 which prioritises making King’s Lynn and West Norfolk a thriving borough, improving the quality of life for local people and building a more resilient council⁷. This West Norfolk Economic Strategy Action Plan provides the roadmap for delivering these local priorities through a portfolio of activities that include apprenticeships, local labour clauses, reducing youth unemployment and enabling local businesses and employees to access a wide range of skills and education opportunities.

Local Government Reorganisation could accelerate delivery of the West Norfolk Economic Strategy by simplifying decision making, consolidating economic development functions, and creating a clearer strategic mandate for investment and growth. A three-unitary arrangement was chosen as the best way forward for Norfolk County. The decision taken is the most likely to preserve the most local autonomy. Overall, no matter the government’s decision, the more consolidation, the better and greater the potential for strategic clarity, investment readiness and faster implementation of the West Norfolk Economic Strategy over the next two years.

Local Plan

The Borough Council adopted its Local Plan in March 2025⁸. However, it is now required to prepare a new local plan within the new plan-making system. This has been introduced by Government through both legislation and policy, which includes Levelling Up and the Regeneration Act (LURA) 2023 and the National Planning Policy Framework (NPPF)^{9, 10}. This new system is a substantial change the previous one and sets out how a local plan must be prepared and the content that can be included.

⁶ [Foreword by the Leader of the Council | Corporate Strategy 2023 - 2027 | BCKLWN](#)

⁷ [Foreword by the Leader and Chief Executive Officer of the Council | Action Plan 2025 - 2027 | BCKLWN](#)

⁸ [Local Plan 2021-2040 \(adopted March 2025\) | Local Plan 2021-2040 \(adopted March 2025\) | BCKLWN](#)

⁹ [Levelling Up and Regeneration Act 2023: progress on implementing build out measures - GOV.UK](#)

¹⁰ [National Planning Policy Framework](#)

The legislation requires local plans to be prepared within the 30-month period. Within this, key milestones will need to be met, including preparing a new evidence base, consultation with relevant bodies, the movement through various Gateways before the final examination, and then hopefully a new local plan can be adopted. Final notice of intent to prepare a new local plan will be given by the 30th of June 2026.

A local plan provides the framework for guiding how decisions on land use, including for new housing, employment and infrastructure, it acts as an important driver for the economy of West Norfolk. Through providing clarity on when and how key spatial planning decisions should be made.

Currently, it is anticipated that the likely date for the adoption of a new local plan for King's Lynn & West Norfolk is May 2029. A timetable for preparation will be published and kept up to date.

Climate Change Strategy

The BCKLWN declared a climate emergency in 2021, setting a target to reach net-zero carbon emissions by 2035, with a potential review for 2030¹¹. The strategy focuses on decarbonising council operations, improving energy efficiency, promoting sustainable transport and enhancing the local environment.

Housing Delivery Strategy

The BCKLWN maintains a strong housing delivery strategy, boasting a 7.9-year housing land supply (2025 -2030) and a Local Plan adopted in March 2025 that shapes development through 2040. The approach focuses on meeting housing needs, supporting sustainable growth and ensuring affordable housing, guided by the Housing Delivery Test (HDT) Action Plan 2024 -2025.

As well as having adopted a new Local Plan recently (March 2025), the Borough Council is currently (2025/26) able to demonstrate a healthy 5-year housing land supply position of 7.9 years' worth against the minimum requirement of 5 years' worth¹². The latest (2023) Housing Delivery Test (HDT) result for the Borough Council is 87% and accordingly a HDT Action Plan has been published.

The BCKLWN are currently drafting a Housing Delivery Strategy that will set out the role that the Council will play in delivering housing of all tenures across the borough. This has been informed by consultation with external partners from across the sector including developers of all sizes and registered providers of social housing.

¹¹ [Climate change | Borough Council of King's Lynn & West Norfolk](#)

¹² [5-year housing land supply position and Housing Delivery Test \(HDT\) | BCKLWN](#)

Marmot Place

King's Lynn has officially been designated as a "Marmot Place" from 2024, partnering with the Institute of Health Equity (IHE) to tackle health inequalities. Led by the Borough Council, Norfolk Public Health, and the ICB, the initiative focuses on social determinants like housing, education and employment to improve life quality across the region¹³. With year 2 of the programme focussing on employment and skills.

King's Lynn Transport Strategy

The King's Lynn Transport Strategy led by the BCKLWN and Norfolk County Council, aims to support economic growth, improve air quality and enhance travel choices through to 2036. Key priorities include active travel, public transport improvements and reducing congestion to support housing development, such as the £109m West Winch Housing Access Road ¹⁴.

Inclusive growth

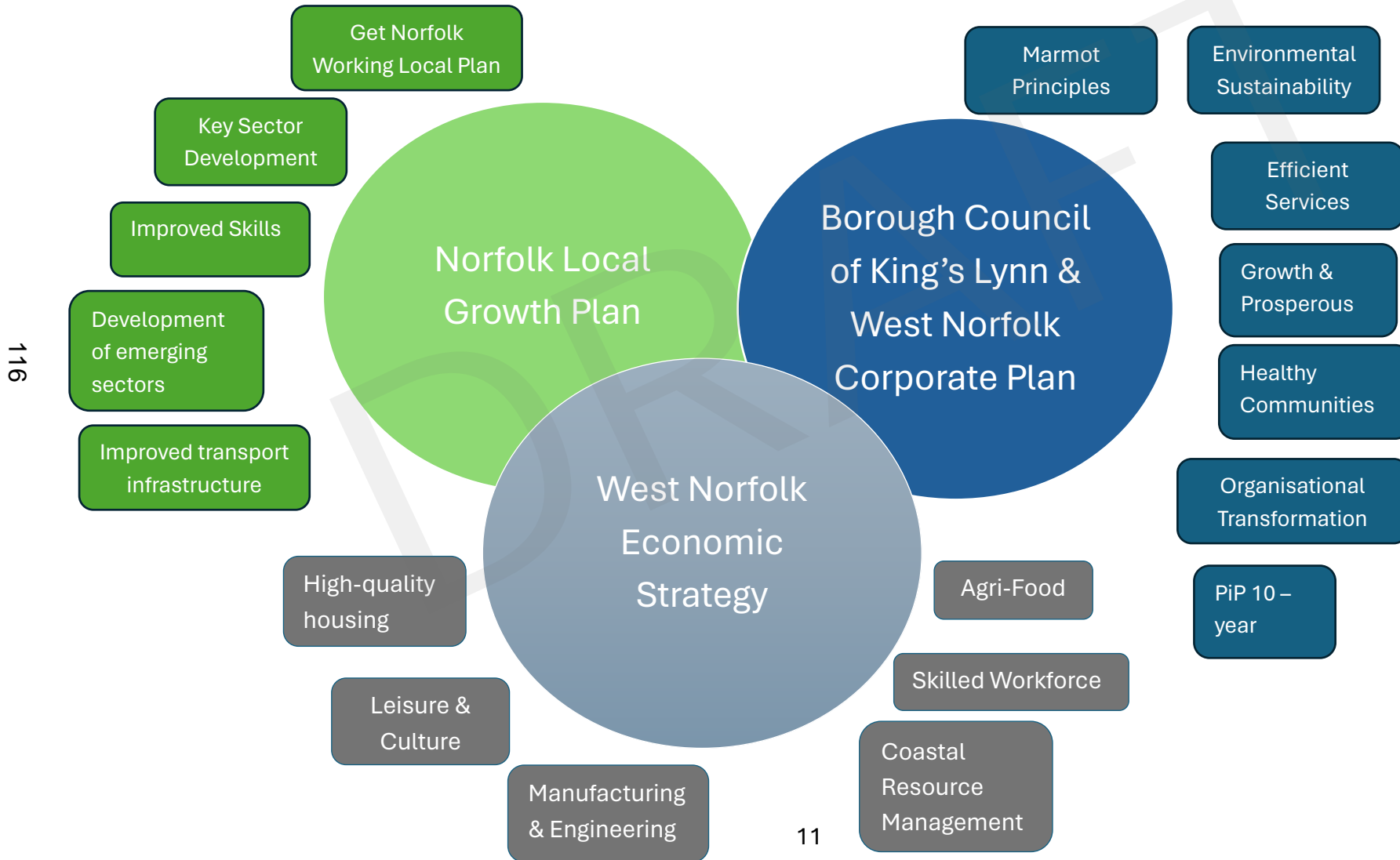
This Action Plan is designed to support the West Norfolk Economic Strategy vision to make King's Lynn & West Norfolk a thriving borough, delivering environmentally sustainable and inclusive growth that benefits local people, places and businesses. This plan has been built with the principle of inclusive growth at the forefront, and all interventions will be designed and delivered that help us achieve that important inspiration. Inclusive growth in West Norfolk means an economy where rural communities, coastal towns, older workers, young people, and disadvantaged neighbourhoods all share in the benefits of investment, skills, jobs, and regeneration not just a select few.

¹³ [King's Lynn becoming a Marmot place | Borough Council of King's Lynn & West Norfolk](#)

¹⁴ [King's Lynn Transport Study and Strategy | Borough Council of King's Lynn & West Norfolk](#)

Strategic Linkages

Figure 1 - Local and Regional drivers of the WNES Action Plan



Strategic Priority 1: THRIVING TOWNS

Why this priority?

Transforming our towns into vibrant day-and-night destinations directly aligns with the Investment, Enterprise, Transport Connectivity, and Innovation levers set out on page 14 of the West Norfolk Economic Strategy. These levers support increased footfall, stronger business activity and greater investor confidence helping to grow the local economy by attracting more residents, visitors and businesses into our town centres.

Vision 2045

In 2045 our towns will be lively and attractive during both the day and night, offering a strong entertainment and dining scene. More people will live in our towns and will choose to spend more of their leisure time and money within the area. We will attract more tourists who will explore our beautiful coastal and countryside areas, rich cultural heritage, and vibrant town centres, supporting a year-round borough wide visitor economy.

Priorities for 2026 – 2028

Over the next two years, the Borough Council will advance a focused set of interventions that apply the growth levers set out in the Economic Vision and Strategy. This will include strengthening the day-to-night offer in our town centres through coordinated use of the Transport Connectivity, Enterprise and Innovation levers, working with the Business Improvement District (BID), cultural partners, transport operators and the Local Visitor Economy Partnership (LVEP) to broaden the hospitality and leisure offer and increase activity throughout the week.

We will also utilise the Housing / Employment Land lever to support the delivery of additional town centre housing, collaborating with developers, registered providers and planning stakeholders to expand the year-round customer base and reinforce local Labour Supply. This will be set out in the masterplans for King's Lynn and Hunstanton.

In parallel, we will strengthen links between our towns, coastline, countryside and heritage assets by applying the Transport Connectivity, Trade, and Innovation levers to improve access, visitor routes and coordinated destination marketing, working closely with tourism bodies, Norfolk County Council and environmental partners.

Through these coordinated, partner-led actions and by embedding the Health and Wellbeing lever across delivery that embeds recommendations from the Marmot programme, we will help grow a more resilient visitor economy and ensure benefits are shared across communities throughout the borough.

Approach

Programmes, Initiatives, Projects	What is happening?	2026 – 2028 Actions	Desired Outcomes	Resourcing / Funding requirement(s)	Lead External Partner(s)
Pride in Place programme 10-year vision	Enhancing local neighbourhoods including the town centre, involving residents from the ground up in identifying and prioritising deliverable improvements to local provision and the creation of vibrant community focused spaces.	<ul style="list-style-type: none"> • Delivery of town-centre improvement projects (2026–2028) St George’s Guildhall & Creative Hub and Riverfront Phase II • Investment in Community development by existing community leaders to establish independent charitable organisation to lead programme & legacy. • Neighbourhood Area Action Plans to inform PiP investment. 	<p>Enhanced heritage assets to drive town centre viability and vibrancy.</p> <p>Visible uplift in town centre and neighbourhood quality.</p> <p>Higher footfall and dwell time, boosting local spend and SME resilience.</p> <p>Improved community involvement in shaping funding decisions to meet local need.</p>	<p>Resource: BCKLWN Officer time / KLNb strategic oversight. Creation of community development team.</p> <p>Funding: £20 million secured through UK government funded Pride in Place programme. Additional Match Funding to be secured.</p>	King’s Lynn Neighbourhood Board, Vision King’s Lynn Operational Group
Town Centre Repurposing & High Street Rental Auctions	<p>Progress scheme to repurpose the KL town centre, converting underutilised land/vacant premises for new uses in line with 10 Year Vision.</p> <p>Utilise new legal direct powers to activate empty units in KL through High Street Rental</p>	<ul style="list-style-type: none"> • Recruitment of Empty Properties Officer and create a digital register of all high street vacancies by Q4 2026 [NEW]. • Devise funding strategy, priorities and business 	<p>Visible reduction in vacated commercial units and increased activation in underutilised town centre spaces.</p> <p>A shift from incentives to proactive vacancy</p>	<p>Resource: BCKLWN Empty Properties Officer time.</p> <p>Funding: Potential funding opportunities from PiP programme</p>	Property Owners, BID, Private Landlords, NCC High Street Matters, Historic England, Neighbourhood Board, Housing Associations

	<p>Auctions legislation in association with the Empty Properties Officer.</p> <p>Engagement and education measures with landlords / shop owners operators to support new Conservation Area Appraisal and Shop Front Guide developed with Conservation alongside King's Lynn Masterplan.</p>	<p>case ready for review by KLN B [NEW].</p> <ul style="list-style-type: none"> • Designation of HSRA Area (Southern High Street) [NEW]. 	<p>management, empowered by statutory HSRA powers.</p> <p>Shop front improvements. Improvements to public realm in target areas.</p>	<p>and Historic England.</p>	
<p>West Norfolk Festivals and Events programmes</p>	<p>Year round programme of festivals and events to increase footfall, vibrancy and spend in the local economy. Supports wider health and well being agenda to reduce social isolation. Programme for WN promoted through Visit West Norfolk and Discover King's Lynn, brings together and promote collectively events held and organised by the Borough Council, Local VCS and estates.</p>	<ul style="list-style-type: none"> • Deliver a coordinated annual programme of at least 25 festivals and events across West Norfolk (2026–2028), ensuring a balanced mix of cultural, community, seasonal and town-centre activity. • Increase event participation and footfall by 10% by 2028, through enhanced marketing via Visit West Norfolk and Discover King's Lynn, and stronger coordination with partners, including BID, VCS and local businesses. 	<p>Enhanced vibrancy and attractiveness of West Norfolk as a destination.</p> <p>Reduced social isolation through accessible, community-led events and activities.</p> <p>Stronger partnership working between BCKLWN, VCS organisations, BID and the private sector.</p>	<p>Resource: BCKLWN Officer time and voluntary support.</p> <p>Funding: BCKLWN, Local estates and VCS organisations and local business sponsorship.</p>	<p>BCKLWN, VCS, BID and private sector</p>

International Hanse	Engagement through the Hanse Commissioner for England and the English modern Hanse link to celebrate and utilise Hanse business and cultural network links to support initiatives that align with corporate priorities	Send a King’s Lynn delegation to the International Hanse Day annually to strengthen trade, cultural and tourism links.	A stronger national identity of England’s leading Hanseatic town. Stronger international partnerships across the Hanse network supporting culture and economic exchange.		Local cultural organisations, schools, maritime
King’s Lynn Masterplan	The BCKLWN is preparing a 20-year masterplan to guide investment and regeneration to improve the viability of the town centre, support housing delivery, increase the visibility of the town’s cultural offer, led with the King’s Lynn Neighbourhood Board and a multidisciplinary team (BDP with Urban Flow, Aspinall Verdi and Mikhail Riches).	<ul style="list-style-type: none"> • Deliver “Quick-Wins” and public-realm upgrades by Q4 2027. Plus, begin work to establish delivery plans and business cases for priority sites such as Debenhams [NEW]. • Work with the Planning Policy Team to integrate those elements which are able and required to be from King’s Lynn Masterplan into the new local plan by Q4 2026 / Q1 2027 [NEW]. • Prepare sites for future development including developing business cases and funding routes. Support early ‘de risking’ 	Begin to deliver masterplan outcomes and projects to provide certainty for delivery. Brownfield activation: 1 landmark building (e.g., former Debenhams) re-opened or under contract. Town centre vitality supported by activation / events. Supported by Town Centre Repurposing Action.	Resource: BCKLWN Officer time / Consultancy support. Funding: Pride in Place, Historic England, Homes England, Devolution to be determined	King’s Lynn Neighbourhood Board, Norfolk County Council, Historic England, Homes England & Heritage Partners, Private Landowners / Developers

		works to Sommerfeld and Thomas [NEW] .			
Hunstanton Masterplan	The BCKLWN is preparing a new Hunstanton Masterplan to guide regeneration and development over the next 10–20 years, replacing and consolidating the 2008 masterplan.	<ul style="list-style-type: none"> • Complete and adopt the final masterplan by Q4 2026. • Produce Investment Prospectus (Qtr 2 2026) and host Investors Day (Qtr 3 2026) to determine [NEW]. • Coordinate and develop public realm design to integrate with and guide the Sea Defence / Promenade capital project. 	<p>Improved town-centre vitality, increase in tourism value, and stronger local business pipeline.</p> <p>Visible improvements at key nodes: town–seafront link, Northern Gateway / Oasis Area site, southern gateway, Promenade Park, and key public spaces.</p>	<p>Resource: Officer time / Consultancy Support.</p> <p>Funding: To be determined (potential for private sector investments through Investment Prospectus).</p>	Hunstanton Town Council, Norfolk County Council, Greyfriars Project Management, Local SMEs, Tourism Operators, Coastal, Heritage & Environmental bodies
The King’s Lynn Library	Completion of vacant site for new library to expand cultural, learning and community use. Programming to ensure delivery of the original business case outcomes including business start up support, skills and training and community hub activities.	<ul style="list-style-type: none"> • Opened March 2026 to public with new facilities available to residents, businesses and local organisations to provide a hub learning, education, co working and community engagement. Programming with partners to achieve business case outcomes 	Higher community and business use of a town centre asset and improved access to learning opportunities.	<p>Resource: Norfolk County Council Library staff time / External partner delivery capacity.</p> <p>Funding: £17.3 million secured and partly funded through King’s Lynn Town Deal Board.</p>	Norfolk County Council in partnership with Adult Learning, College of West Anglia, BPIC

Inner Purfleet	Enhancing connectivity and public realm in a key waterfront area.	<ul style="list-style-type: none"> • Develop full business case for RIBA stage 2 and secure funding by 2027 [NEW]. 	Better connectivity, safer walking routes and a higher-quality public realm.	<p>Resource: BCKLWN Officer time / Consultancy support.</p> <p>Funding: To Be Determined.</p>	Norfolk County Council
Gyratory and Baxters Plain Study (STARS)	Upgrading infrastructure and public realm improvements in a key gateway area to the one-way system (Gyratory) and Baxter's Plain public realm scheme.	<ul style="list-style-type: none"> • Deliver active travel, safety and public-realm improvements by late 2028. • Begin public consultation in King's Lynn by Q3 2026. 	Safer, more attractive gateway environment supporting movement and local activity.	<p>Resource: NCC Officer time supported by BCKLWN Officers</p> <p>Funding: £20.81 million secured (Levelling Up Fund).</p>	Norfolk County Council
King's Lynn Riverfront Phase I, II & III	<p>Long-term regeneration of the riverfront into a mixed-use, accessible destination.</p> <p>Phase I – completed Towns Fund project to Custom House and dryside facilities, business planning and benefits realisation planning</p> <p>Phase II – onwards delivery of public realm projects emerging from the Riverfront Regeneration Area emerging from the King's Lynn Masterplan.</p>	<ul style="list-style-type: none"> • Restoration & refurbishment of Custom House & Dryside facilities during Qtr 2 2026-Qtr 1 2027. • Progress community led delivery of Phase II at South Quay/Devils Alley starting Qtr 3 2026. • Develop a Riverfront Delivery Framework by 2027 for Phase II & III aligning investment, 	Enhanced riverfront experience, increased visitor activity, and new mixed-use development.	<p>Resource: BCKLWN Officer time.</p> <p>Funding: Phase I – primarily funded by the Towns Fund with co-funding through the BCKLWN's Business Rates Pool and capital programme commitments.</p>	Developers, Community representatives, Local businesses, Environment Agency, Historic England, Homes England Norfolk County Council, Homes England

	Phase III – Boal Quay from the King’s Lynn Masterplan at South Quay.	heritage and flood-risk considerations [NEW] .		Phase II - £2m funding pot to be made available from the Pride in Place programme. Match funding opportunities to be progressed.	
The Old Library	Converting the former King’s Lynn Library for community use with the Garage Trust selected the new custodian with site acquired and initial opening Qtr 1 2026	<ul style="list-style-type: none"> • Relocation of The Workshop to the old Library and meanwhile use activities Qtr 1 2026. • Secure initial capital funding by Q4 2026 to support early refurbishment [NEW]. 	<p>Preservation and revitalisation of a key heritage asset whilst enabling modern community uses.</p> <p>Economic uplift to South Lynn / London Road gateway by creating new opportunities for performance, arts and cultural activities for young people. .</p>	<p>Resource: The Garage Trust.</p> <p>Funding: Architectural Heritage Fund, NLHF & Arts Council</p>	<p>Garage Trust, Culture & Heritage Steering Group, Creative Arts East, Community groups and Local Residents</p>
Southgates Regeneration Area	Planning and design to unlock a major gateway regeneration scheme to King’s Lynn.	<ul style="list-style-type: none"> • Finalise planning and site clearance strategy by Q2 2026/7 [NEW]. • Secure partner commitments and funding by mid-2027 [NEW]. • Progress planning application for the scheme Mid 2027 	<p>Improved health and wellbeing through placemaking led approach including new homes, active travel infrastructure and landscaping.</p> <p>Improved town centre perception, pride of place</p>	<p>Resource: BCKLWN Officer time / Consultancy support.</p> <p>Funding: Homes England, National</p>	<p>BCKLWN, Norfolk County Council, Homes England, Historic England.</p>

				Highways To be determined.	
West Norfolk Tourism Development Plan	<p>The West Norfolk Tourism Development Plan is the borough's strategic framework for tourism centred six strategic aims:</p> <p>Tourism Ambassadors Course.</p> <p>Out of season tourism campaigns: "Norfolk Coast, Myths & Legends".</p> <p>Environmental and Responsible Tourism Campaigns: "Visit West Norfolk...Naturally"</p>	<ul style="list-style-type: none"> • Refresh and adopt the West Norfolk Tourism Development Plan by Q4 2026, aligning priorities with Visit East Anglia LVEP, Norfolk County Council and local place-promotion partners. • Introduce a light-touch annual monitoring framework from 2026, reporting on visitor numbers, footfall trends, business engagement and estimated economic impact [NEW]. 	<p>A stronger, more consistent West Norfolk destination identity, supported by high-quality place promotions marketing.</p> <p>Increased visitor numbers, dwell-time and spend, improving local economic resilience.</p>	<p>Resource: BCKWLN Officer time.</p> <p>Funding: To Be Determined.</p>	West Norfolk Tourism Forum, Heritage sites, Local museums, Local SMEs in tourism & hospitality sectors
Business Improvement District Ballot	<p>The Discover King's Lynn BID Ballot is the formal process through which town centre businesses vote on whether to renew the Discover King's Lynn Business Improvement District for a new five-year term.</p>	<ul style="list-style-type: none"> • Approve and launch a new five-year BID Business Plan by 2026, aligned with Pride in Place and Thriving Towns objectives [NEW]. 	<p>A renewed business-led investment stream supporting King's Lynn town centre.</p>	<p>Resource: BID personnel time and support. Revenues team to support the ballot process.</p> <p>Funding: Revenues funding from BID.</p>	BID, BCKLWN
King's Lynn Visitor	<p>A new dry side facility is under development converting an annex into toilets,</p>	<ul style="list-style-type: none"> • Bring the new dry side facilities into full operation by Q2 2027, 	<p>Increased leisure sailing -related visitor numbers</p>	<p>Resource: BCKWLN Officer time.</p>	Sail the Wash, promotional platform

<p>Mooring Pontoons</p>	<p>map-reading space and visitor information for mariner.</p> <p>Relaunch of visitor pontoons and facilities.</p> <p>Relaunch of visitor pontoons and facilities.</p>	<p>including showers, laundry, toilets and visitor information services.</p> <ul style="list-style-type: none"> • Renewed marketing campaign to promote the facilities of King’s Lynn [NEW]. 	<p>and spend in the town centre.</p> <p>Contribution to a wider riverfront regeneration vision of a connected, attractive riverfront offering.</p>	<p>Funding: Towns Fund.</p>	
<p>Lynnsport / Valentine Park Housing Development</p>	<p>Delivery of a strategic housing development of 96 housing units at Lynnsport / Valentine Park, providing new homes alongside green space, leisure access and community infrastructure.</p>	<ul style="list-style-type: none"> • Monitor delivery annually (2026-2028) against housing numbers, tenure mix, affordability and infrastructure commitments. • Ensure strong integration with Lynnsport and Valentine Park including safe walking and cycling links and access to leisure facilities. 	<p>High-quality, well-connected neighbourhood(s) supporting healthy lifestyles.</p> <p>Increased housing supply aligned with local Brough needs.</p>	<p>Resource: BCKLWN Officer time / Developer investment and delivery capacity.</p> <p>Funding: £23.5 million secured.</p>	<p>Lovells, Alive West Norfolk (Leisure integration)</p>
<p>Parkway (Gaywood) Housing Development</p>	<p>Residential development providing 226 new homes, associated infrastructure and green spaces.</p>	<ul style="list-style-type: none"> • Achieve 50% delivery of the overall housing mix including affordable and low-carbon home by the end of 2028 	<p>Delivery of high-quality homes meeting local needs, improving local infrastructure and stronger neighbourhood cohesion.</p>	<p>Resource: BCKLWN Officer time.</p> <p>Funding: Due to inflation and rising costs, the estimated budget for this project has risen from £48 – £54 million.</p>	<p>Lovell Partnerships, Homes England</p>

Hunstanton and Downham Market historic area enhancements	The Historic Area Enhancements initiative focuses on improving the public realm, heritage assets and townscape quality in Hunstanton and Downham Market, enhancing the character and setting of their historic cores.	<ul style="list-style-type: none"> • Identify and prioritise key historic streets and spaces by 2026, working with town councils, conservation officers and local stakeholders. • Deliver phased public-realm improvements by 2027–28, focusing on high-footfall historic areas and gateways. 	<p>More attractive, legible and welcoming historic town centres.</p> <p>Enhanced visitor experience, supporting local businesses and tourism.</p>	<p>Resource: BCKLWN Officer time / Consultancy support.</p> <p>Funding: delivered through a blend of capital regeneration funding, heritage-linked grants and BCKLWN investment.</p>	Historic England

Key economic monitoring indicators (KPI's)

Outcome	Data Source(s)	Functionality	Why it matters?
Housing Units	ONS Housing Building, MCHLG Net Additional Dwellings, MCHLCG Open Data, Homes England Housing Statistics, ONS Local Area Stats	Tracks supply (starts/completions), conversions, demolition, and overall net change.	Shows whether enough new homes are being delivered and helps monitor regeneration and population growth.
Footfall	King's Lynn Neighbourhood Data Pack, Center for Cities transaction – based activity data	Measures town centre activity and spending patterns as a proxy for footfall.	Indicates how many people are visiting and using services key for judging high street vitality and the day-to-evening economy.
Vacancy rates	Local Data Company, Center for Cities, BCKLWN Town Centre / Operations Team.	Measures vacancy, re-occupancy rates, and provides town centre baseline for occupancy	Falling vacancies signal a healthier business environment. Helps evaluate regeneration impacts and guide investment.

Strategic Priority 2: ACCESS TO EDUCATION & GOOD WORK

Why this priority?

Increasing economic participation and activity across all social and demographic groups aligns directly with the Skills Supply, Labour Supply, and Policy and Regulation levers set out on page 14 of the West Norfolk Economic Strategy. These levers are essential for improving access to high-quality jobs, raising skills and wages, and supporting inclusive employment, enabling West Norfolk to build a more resilient and equitable labour market.

Vision 2045

In 2045 we will be a community where younger people are inspired into local careers and find ample opportunities to start their careers locally and older people can work, or volunteer, for longer if they want to. We will attract mid-career professionals and families to settle and work in our borough. Clear career pathways and targeted high skilled training will match the needs of local industries, ensuring that residents can access high quality jobs.

Priorities for 2026 – 2028

Over the next two years, the Borough Council will strengthen local pathways into employment by applying the Skills Supply and Labour Supply levers to create clearer routes into local careers. Working with schools, colleges, employers and training providers, we will expand access to qualifications and training aligned to industry needs, ensuring residents can secure the skills required by the borough's key sectors, delivering West Norfolk Skills Working Group chaired by the Principal of the College of West Anglia.

We will also support older residents who wish to continue working or volunteering by encouraging employers to adopt age-friendly and flexible employment practices, making use of the Policy and Regulation lever to promote more inclusive workforce participation.

In parallel, we will focus on attracting mid-career professionals and families to West Norfolk, drawing on the Investment, Innovation, and Enterprise levers to strengthen the quality of local job opportunities and support business growth. By improving careers information, targeting training provision and enhancing collaboration between employers and educators, we will help build a labour market that delivers high-quality employment opportunities for residents at all stages of life.

Approach

Programmes, initiatives & projects	What is happening?	2026 – 2028 Actions	Outcomes	Resourcing / Funding requirement	Lead External Partner(s)
Connect to Work Programme	Helping economically inactive residents access training and work experience.	<ul style="list-style-type: none"> Support at least 500 economically inactive residents in West Norfolk into training or work experience by Q4 2028 [NEW]. 	Increased employment rate among economically inactive groups.	<p>Resource: BCKLWN Officer time / Local Business support.</p> <p>Funding: Secured from Norfolk County Council.</p>	Jobcentre Plus, Local SMEs, Lead organisation Stan Guide.
St. Georges Guildhall Outreach Education Programme	A creative and cultural outreach programme delivering schools engagement, community workshops and heritage learning.	<ul style="list-style-type: none"> Engage 1,000 young learners per year through workshops, schools' outreach and community learning 	Increased participation in creative learning and stronger cultural education pathways.	<p>Resource: BCKLWN Officer time / Local educational providers support from schools and colleges.</p> <p>Funding: secured until Sept 2026. Application to Arts Council pending for programme continuation.</p>	St. Georges Guildhall, Community organisations, Primary & secondary schools.
Highway Infrastructure upgrades A17	Major transport corridor upgrades improving connectivity, journey	<ul style="list-style-type: none"> Deliver targeted corridor improvements (e.g. 	Better connectivity supporting economic growth	Resource: NCC Officer time / Consultancy support.	National Highways, Norfolk County Council, DfT

	times, reliability and access to employment centres.	junction capacity, safety and resilience measures) improving journey reliability and supporting economic growth.	and inward investment.	Funding: £34 million upgrade involving a new single-carriageway flyover (grade separation to take east-west traffic over the junction.	
King's Lynn Transport Strategy	Improvements to infrastructure, routes and frequencies to access education and employment.	<ul style="list-style-type: none"> •Progress Business case development for priority schemes in the strategy. 	Better connectivity supporting educational and economic growth.	Resource: NCC Officer time. Funding: Bus Services Improvement Plan, (LUF) STARS.	Norfolk County Council, Highways England/DfT, Public Transport providers, Developers – S106
BOOST	Supporting residents to progress into higher-level skills through targeted training and employer partnerships.	<ul style="list-style-type: none"> • Increase annual Level 4+ enrolments to 200 learners by Q4 2027. 	Level 4+ skills attainment increases. Reduction in NEETs. Supporting more young people into training & employment.	Resource: NCC Officer Employer engagement and mentoring input. Funding: Q1 + Q2 2026 – 2027 UKSPF & NCC Funding. Funding for 2027-2028 secured by NCC	Norfolk County Council
West Norfolk Skills Action Plan	Coordinated plan to improve local skills, raise productivity and widen access to high-paid jobs. Priority areas 2026 -27 marketing campaigns, schools & youth engagement and tackling	<ul style="list-style-type: none"> • Publish an updated Skills Action Plan annually (2026, 2027, 2028) using local labour market evidence and stakeholder agents evidence [NEW]. 	Wages and GDHI rise across the borough. More industry needs and labour market skills base.	Funding: BCKLWN & NCC existing financial resources. Resource: BCKLWN Skills and Attainment Budget.	Norfolk County Council, College of West Anglia

	the economically inactive .		Reduction in economically inactive.		
National Manufacturing Day	National Manufacturing Day. Annual, UK-wide initiative that celebrates manufacturing and engineering, aiming to improve the sector's profile, inspire future talent, and showcase modern manufacturing as a high-value, innovative and inclusive career path.	<ul style="list-style-type: none"> • Link National Manufacturing Day activity to the King's Lynn Manufacturing Group, using it as a focal point for employer collaboration and skills discussions [NEW]. 	<p>Increased awareness of manufacturing as a modern, skilled and well-paid sector.</p> <p>Greater visibility of West Norfolk's manufacturing strengths and growth sectors.</p>	<p>Funding: Minimal delivery costs.</p> <p>Resource: BCKLWN Officer in coordinating, promoting and communications / participating manufacturers provide use of premises and demonstrations.</p>	Local manufacturing companies
Strategic Skills Plan	Long-term approach to shaping the skills system around local economic needs.	<ul style="list-style-type: none"> • Launch two pilot advanced technical pathways from national or regional priority sectors (e.g. AI, green tech) by December 2027 [NEW]. 	High proportion of senior professional employment and technical occupations.	<p>Resource: BCKLWN & NCC Officer time.</p> <p>Funding: NCC, Adult Skills budget.</p>	Norfolk County Council, Combined Authority
School of Nursing Phase II	Expansion of local healthcare and digital learning capacity through new training.	<ul style="list-style-type: none"> • Strengthen employer-led placements, ensuring 100% of students have local clinical placement opportunities across acute, community and social care settings [NEW]. 	More people developing the right skills for opportunities in healthcare industries.	<p>Resource: College of West Anglia personnel teaching and support.</p> <p>Funding: secured - £1.4 million phase for a second-story expansion.</p>	College of West Anglia, NHS Trust (Queen Elizabeth Hospital)

		<ul style="list-style-type: none"> • Establish new dental nursing provision by 2026/2027 [NEW]. 		The College of West Anglia also received a £188, 930 grant from Norfolk County Council.	
Health Sector Work Experience Co-ordination Programme	The programme is a 2-year, ICB-commissioned intervention led by the College of West Anglia (CWA) to coordinate, expand and standardise health-sector work-experience opportunities across West Norfolk.	<ul style="list-style-type: none"> • Secure continuation or successor ICB funding by Q1 2027 to extend the programme beyond the initial 2-year commission. • Embed pre-placement preparation and post-placement reflection with schools and learners to improve readiness and outcomes. 	<p>Better alignment between education, workforce planning and ICS priorities.</p> <p>Clearer and stronger pipelines into health and social care careers.</p>	<p>Resource: College of West Anglia personnel teaching and support.</p> <p>Funding: ICB - commissioned workforce development funding.</p>	College of West Anglia, Queen Elizabeth Hospital
Norfolk & Suffolk Local Skills Improvement Plan	Employer-led plan to align skills delivery with business needs across the region.	<ul style="list-style-type: none"> • Conduct an annual employer needs survey with 500+ businesses (2026, 2027, 2028) [NEW]. • Submit final draft of the plan to the Secretary of State (DWP or Department of Education) ready for sign off. 	Employer satisfaction with skills provision improves.	<p>Resource: employer engagement via Chambers of Commerce / BCKLWN & NCC Officer time.</p> <p>Funding: national LSIP arrangements and aligned skills budgets.</p>	Norfolk Chamber of Commerce, Skills Advisory Panel

Autism Centre at CWA King's Lynn campus	<p>The Autism Centre at the College of West Anglia (CWA) provides specialist education, transition support and tailored learning environments for autistic young people and adults.</p>	<ul style="list-style-type: none"> Establish, maintain and stabilise Autism Centre provision annually (2026–2028), ensuring continuity of specialist teaching, support and therapeutic environments [NEW]. 	<p>Improved educational and life outcomes for autistic learners.</p> <p>Greater support for parents of SEND children parents.</p>	<p>Resource: Specialist College of West Anglia teaching and support staff.</p> <p>Funding: Local authority SEND budgets for transition and post-16 support.</p>	College of West Anglia
Work & Learn Programme (CWA Health & Social Care)	<p>Blended workplace-based and classroom learning for adults progressing in health-sector roles.</p>	<ul style="list-style-type: none"> Publish annual outcomes report tracking learner progression [NEW]. 	<p>Stronger career progression routes within health and social care.</p>	<p>Resource: College of West Anglia delivery staff / BCKLWN Officer time.</p> <p>Funding: dependent on external skills, adult-learning and workforce funding.</p>	College of West Anglia, Integrated Care Board, Health Employers
West Norfolk Ambassadors Programme	<p>Contributes to employability, professional networks, and civic leadership development, especially for young professionals and local employers in customer facing roles.</p>	<ul style="list-style-type: none"> Align Ambassador training content with key programmes, including Pride in Place, the New Hospital Programme, tourism development and skills initiatives, 	<p>Enhanced leadership capacity and career readiness.</p> <p>A growing network of informed local champions supporting place-based growth.</p>	<p>Resource: BCKLWN Officer time / event support from partner organisations.</p> <p>Funding: UKSPF.</p>	VENI, College of West Anglia, Employers

Youth Hubs	Co-located employment and wellbeing support for young people aged 16–24.	<ul style="list-style-type: none"> Operated in at least three locations by 2028 (main urban centres).[NEW] 	Improved youth employment outcomes and confidence.	<p>Resource: Youth workers, Career advisers and employment coaches.</p> <p>Funding: Department for Work & Pensions.</p>	Jobcentre Plus, Youth Providers, Local Employers
Norfolk Business Growth Fund	Established by Norfolk County Council, delivered through the New Anglia Growth Hub, to support small and medium-sized businesses with ambitions to grow, innovate and improve productivity.	<ul style="list-style-type: none"> Promote the Norfolk Business Growth Fund to West Norfolk businesses annually (2026–2028), working with the New Anglia Growth Hub and Norfolk Chambers of Commerce. 	Increased business investment and productivity across West Norfolk.	<p>Resource: Projects must demonstrate growth, productivity improvements and economic impact.</p> <p>Funding: Total programme value: c. £1.1 million county-wide. Grant size: £5,000–£50,000 per business.</p>	Norfolk County Council, New Anglia Growth
Apprenticeship & Career Pathways Fairs with DWP	Provides apprenticeships, training pathways and career support through DWP employer and employment programmes.	<ul style="list-style-type: none"> Deliver twice-yearly employer fairs highlighting DWP apprenticeship and career routes. 	Increased apprenticeship participation and clearer career routes.	<p>Resource: Participating businesses support and engagement / DWP promotion and communications.</p> <p>Funding: Free, drop-in event with over 45 businesses from a variety of sectors and industries.</p>	DWP, Jobcentre Plus, Local Employers
King's Lynn Enterprise Park	It forms part of a wider network of Space to Innovate enterprise zones across Norfolk and Suffolk and is designed to support high-growth, high-value businesses. New premises now	<ul style="list-style-type: none"> Proactive site marketing of available plots and premises, targeted at key sectors. Continue phased development and 	<p>Growth in high-skill, higher-wage jobs across priority sectors.</p> <p>A clearly established innovation and</p>	<p>Resource: BCKLWN Officer time in site promotion and investor engagement / support from Invest in Norfolk & New Anglia Growth Hub.</p>	Norfolk & Suffolk Unlimited, Brown & Co.

	available on the Eastern side at King's Lynn Innovation Centre.	plots release across KLEP (2026–2028) to attract inward investment and local business expansion. • Construction of western infrastructure of site to complete plot availability [NEW] .	employment hub supporting long-term economic resilience.	Funding: blend of public sector capital investment and private sector developer investment.	
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Key economic monitoring indicators

Outcome	Data Source(s)	Functionality	Why it matters?
Employment Rate	ONS Labour Market Overview, ONS Jobs & Vacancies, House of Commons Labour Market Statistics	High-quality, official jobs and employment counts, can benchmark regionally.	Shows whether the local labour market is growing, stable or declining, and how West Norfolk performs relative to the wider region.
Qualifications Level 4+	ONS Local Indicators, NODA, NOMIS	Gives local-level data on higher qualification attainment.	Helps assess residents' access to higher-value jobs, the impact of training investment, and how well skills match business needs.
Number of NEETs	Norfolk County, Council Education & Skills Dashboard, NOMIS,	Provides up to date counts and proportions of young people aged 16-24.	Shows how well the area supports young people into positive destinations. NEET levels are strongly.

Strategic Priority 3: PRODUCTIVE JOBS AND BUSINESSES

Why this priority?

Improving productivity across our sector strengths and retaining more economic value within West Norfolk directly aligns with the Enterprise, Investment, Innovation, and Supply Chain levers identified on page 14 of the Economic Strategy. These levers collectively support business growth, the adoption of modern technologies, expansion of high-quality employment space and greater value capture within the local economy, helping to build a more resilient and competitive business base across the borough.

Vision 2045

In 2045 we will be a community where younger people are inspired into local careers and find ample opportunities to start their careers locally and older people can work, or volunteer, for longer if they want to. We will attract mid-career professionals and families to settle and work in our borough. Clear career pathways and targeted high-skilled training will match the needs of local industries, ensuring that residents can access high-quality jobs.

Priorities for 2026 -2028

Over the next two years, the Borough Council will strengthen the conditions that enable employers to grow, drawing on the Enterprise, Investment, and Innovation levers to support existing firms to expand, encourage new business creation, and reinforce a diverse mix of productive jobs across the local economy. Working closely with our key sectors, we will use the Skills Supply and Labour Supply levers to better understand workforce requirements and help create an environment that supports investment, technological adoption and the creation of higher-value employment.

In parallel, we will take steps to retain and attract talent by promoting West Norfolk as an appealing location for skilled workers, entrepreneurs and families. This includes improving access to training, expanding apprenticeships and higher-level skills provision, and supporting businesses to modernise through the application of the Supply Chain and Policy and Regulation levers to raise productivity and competitiveness.

By prioritising practical collaboration between employers, education providers and local partners, and by coordinating activity across the full suite of economic levers, we will help build a more dynamic and resilient economy in which businesses have the confidence to invest, and residents benefit from secure, well-paid and sustainable employment opportunities across the borough.

Approach

Programmes, initiatives & projects	What is happening?	2026 – 2028 Actions	Outcomes	Resourcing / Funding requirement	Lead External Partner(s)
Incubator space at King's Lynn Enterprise Park	Delivery of flexible workspace to support start-ups and growing firms.	<ul style="list-style-type: none"> Develop full business case and secure funding by Q4 2027 [NEW]. 	Increased employment land and commercial space supporting new and growing businesses.	<p>Resource: Officer time / consultancy / contractor support.</p> <p>Funding: Devolution, EZ Pot C Challenge Fund To be determined.</p>	Enterprise agencies
Creative Hub at St. Georges Guildhall for creative industries	Development of a creative industries hub within a key heritage asset.	<ul style="list-style-type: none"> Launch phase-one workspace and studios by mid-2028 for creatives and micro-firms 	<p>Increased number of start ups</p> <p>Increased GVA in our high-growth potential sectors.</p>	<p>Resource: Officer time / consultancy support.</p> <p>Funding: Towns Fund & Pride in Place secured, Devolution and Arts Council to be confirmed.</p>	Arts Council, Business Support Agencies, St George's Guildhall CIO
KL Enterprise Park Western Site Infrastructure	Enabling and infrastructure works to bring forward additional employment land to the King's Lynn Enterprise Park.	<ul style="list-style-type: none"> Planning determination Qtr 2 2026. Construction works commence Qtr 3 2026, completion Qtr 1 2027. Secure at least three 	Increased employment land availability.	<p>Resource: Officer time / Consultancy support.</p> <p>Funding: Enterprise Zone programme led by the BCKLWN.</p>	Morgan Sindall, Norfolk County Council

		business occupations or developments by 2028 [NEW].			
NORA: Plots M1, M2	Nar Ouse Regeneration Area, delivering new housing and commercial space in King's Lynn, to support and meet the needs of the existing community and growth in South Lynn.	<ul style="list-style-type: none"> • Complete site marketing by Q2 2026. • Begin enabling works by 2027, including utilities and land remediation. 	Expand housing provision and commercial space for the benefit of existing and growing community in South Lynn	<p>Resource: BCKLWN Officer time.</p> <p>Funding: compromised of public grants, local government loans and private sector interest.</p>	Brown & Co (agents), Developers
Digital Skills Programme	Coding and digital bootcamp provider delivering instructor-led skills bootcamps in software development, AI literacy and digital innovation for young people at risk of becoming NEETs.	<ul style="list-style-type: none"> • Establish a West Norfolk Tech Talent Pathway, mapping local SME demand and linking learners with post-graduation support (mock interviews, employment matching) by 2028 [NEW]. 	<p>Increased digital skills capacity in West Norfolk's SMEs, creative sector, and tech-adjacent industries.</p> <p>Stronger cross-regional tech ecosystem linked to King's Lynn - Cambridge growth hubs.</p>	<p>Resource: Venue hire for hackathons and other events.</p> <p>Funding: BCKLWN Skills & Attainment budget.</p>	Tech Educators, Norfolk County Council, Local & regional employers, Local schools and colleges, Queen Elizabeth Hospital
Meet the Buyers events	Procurement focused engagement days connecting local contractors and suppliers with major	<ul style="list-style-type: none"> • Deliver two Meet the Buyer events (spring + autumn) aligned with major project milestones 	Stronger local economic impact of regeneration programmes by	Resource: BCKLWN Officer time / Local contractor(s) support.	Business Support Partners: New Anglia Growth Hub, College of West Anglia,

	capital and regeneration projects across the borough.	(e.g., STARS highways, New Hospital Programme, West Winch Access Road).	maximising local procurement. Enhanced business readiness, skills and compliance via support partners at events.	Funding: Revenue funding secured.	Norfolk Chambers of Commerce, JobCentre Plus
Hot-desking space at the new library	Providing accessible spaces for freelancers and remote workers at the new Library.	<ul style="list-style-type: none"> • Introduce bookable meeting pods and digital access by Q4 2026. Increase workspace usage by 25% by 2028 through targeted promotion and business-support links. 	<p>Increased number of high-growth enterprises.</p> <p>Increased number of new start-ups in West Norfolk.</p>	<p>Resource: library facilities, library staff capacity and Partner support.</p> <p>Funding: secured through Town Deal funding.</p>	Norfolk County Council, BIPC
King's Lynn Innovation Centre	The King's Lynn Innovation Centre offers a range of offices, co-working space, meeting rooms and collaboration areas, alongside business support, networking opportunities and links to regional innovation networks.	<ul style="list-style-type: none"> • Maintain high occupancy levels at KLIC through 2026–2028, supporting a steady pipeline of start-ups and growing businesses. • Sub divide large units into smaller units to meet user 	<p>A stronger local innovation ecosystem supporting productivity and high-value jobs.</p> <p>Greater visibility of King's Lynn as a place to start up, innovate and invest.</p>	<p>Resource: supported by existing business support and innovation programmes</p> <p>Funding: benefits from alignment with external funding streams accessed by client businesses.</p>	Enterprise Agencies, New Anglia Growth Hub

		<p>demand by Qtr 3 2026 [NEW]</p> <ul style="list-style-type: none"> • Review business support provision and startup space and promote co-working. 			
Project Gigabit	Expansion of high-speed broadband across the borough.	<ul style="list-style-type: none"> • Achieve 90% gigabit-capable coverage across the borough by 2028, prioritising rural not-spots. • Annual reporting (2026–2028) on coverage progress with DCMS. 	Increased digital infrastructure capabilities for West Norfolk enhancing digital connectivity and greater productivity gains.	<p>Resource: BCKLWN Officer coordination / delivery partners' support.</p> <p>Funding: The Norfolk contract signed in June 2023. It is valued at £114.2 million, targeting over 62,200 premises across the county.</p>	DCMS, Broadband Providers
Skills Bootcamps	Employer-led training focused on priority sectors.	<ul style="list-style-type: none"> • Achieve an average 70% job-outcome rate for learners entering work or progressing careers. 	<p>Increased workforce skills in priority sectors.</p> <p>Elevates West Norfolk to become a high skill – high wage economy.</p>	<p>Resource: Norfolk County Council staff time.</p> <p>Funding: Up to £4 million will be spent delivering free skills training to an extra 1,345 adults across Norfolk and Suffolk in 2025/26.</p>	Norfolk County Council, Training Providers
Rural Incubator space study	The Rural Incubator Space study to assess the opportunities, needs, demands for start up and co working space in rural	<ul style="list-style-type: none"> • Conduct one feasibility and demand study to identify future 	Improved access to affordable workspace for rural entrepreneurs.	<p>Resource: BCKLWN economic development and business support resources.</p>	Enterprise and Business Support Agencies

	service areas and towns (i.e. Hunstanton, Downham Market), to provide flexible, low-cost workspace and business support for start-ups, micro-businesses and home-based enterprises in rural parts of West Norfolk.	need and options [NEW] . • Explore funding and delivery options for incubator spaces [NEW] .	Clear pathways from rural incubation into wider business-growth support and permanent premises.	Funding: Potential funding sources from Devolution.	
New Library business offering	Expansion of business-focused services within libraries, including advice, guidance, support, events, digital tools and workspaces.	• Deliver quarterly business events/workshops (2026–2028) [NEW]	Improved access to business support and increased start-up creation.	Resource: King’s Lynn Library staff time. Funding: Town Deal secured	Libraries Service (BIPC), Growth Hub, Norfolk Chambers of Commerce
Go Digital	Digital support programme helping SMEs adopt technology, improve productivity and expand online.	• Deliver annual digital-skills events and webinars.	Improved digital capability within the local business base.	Resource: New Anglia Growth Hub Funding: Secured partly by UK government through UK Shared Prosperity Fund. Grants of £5,000 - £20,000 to businesses	Norfolk County Council, Local SMEs
Purfleet Street Pop Up Units	Incubator containers to provide ‘easy in easy out’ opportunities for small businesses to trial a business.	• Relaunch of pop ups following completion of external works Qtr 2 2026 • Wrap around support from enterprise agencies [New]	Increase number of start up businesses Increased footfall from Rail to river.	Resource: BCKLWN officer time Funding: capital through Town Deal.	New Anglia Growth Hub

King's Lynn Manufacturing Group	<p>Networking event for manufacturers of all sizes and specialisms in the Borough to come together once a quarter. Areas of focus include skills needs, among others.</p>	<ul style="list-style-type: none"> • Secure participation from at least 20 local manufacturers by end of 2026 [New] • Hold 3-4 meetings per year, each focused on a strategic theme (automation, robotics, supply chains, energy reduction, funding). 	<p>Greater learning and networking opportunities.</p> <p>Greater business opportunities as manufacturers gain access to the labour market.</p> <p>Regular access to BCKLWN services applicable to the sector including grants and other business development aid.</p>	<p>Resource: NAAME staff / BCKLWN Officer time.</p> <p>Funding: No funding requirements needed.</p>	<p>Local manufacturing employers, College of West Anglia, NAAME,</p>
King's Lynn & West Norfolk Local Plan 2021 – 2040	<p>The Plan sets out the spatial strategy for housing, employment, infrastructure and environmental protection, identifying where growth should take place and the policies that will shape how it is delivered.</p>	<ul style="list-style-type: none"> • Engage and identify future employment land requirements [NEW]. • Monitor employment land delivery, supporting key sites such as town centres and enterprise locations [NEW]. 	<p>Strong alignment between spatial planning and economic priorities, including thriving towns, enterprise growth and rural development.</p>	<p>Resource: BCKLWN Officer time.</p> <p>Funding: To Be Determined.</p>	<p>Landowners</p>
Hardwick Estate Expansion	<p>Expansion of a strategic employment site to meet</p>	<ul style="list-style-type: none"> • Secure infrastructure funding. 	<p>Expanded commercial floor</p>	<p>Resource: Developer delivery capacity support /</p>	<p>Developers, Landowners</p>

	demand for retail, logistics and commercial space.	<ul style="list-style-type: none"> • Deliver first development plots by 2028. 	space and job creation.	BCKLWN Officer coordination time. Funding: To Be Determined.	
Young Futures Hub	New national government programme providing youth-led, inclusive physical and digital spaces for 10 – 18-year-olds.	<ul style="list-style-type: none"> • Conduct a Local Youth Needs Assessment to map mental health, opportunity gaps, and risk factors for 10–18-year-olds by Q4 2026 [NEW]. 	<p>Increased opportunities for young people in skills, creativity, leadership and progression routes.</p> <p>Reduced crime and anti-social behaviour, particularly for at-risk youth.</p>	<p>Resource: BCKLWN Officer time / External partner service capacity.</p> <p>Funding: DCMS programme funding with partner contributions where available.</p>	Department for Culture, Media & Sport (DCMS), Local schools, Community youth services
Norfolk for Jobs	Partnership-driven employment and skills initiative launched in March 2024, bringing together employers, public sector organisations, voluntary groups, to tackle labour-market challenges, fill vacancies.	<ul style="list-style-type: none"> • Publish an annual Local Labour Market Impact Report tracking successful placements, employer participation, and sector-based skills demand [NEW]. 	<p>Better alignment between employer needs and local skills programmes.</p> <p>Employers able to recruit and retain local workforce.</p>	<p>Resource: Local employers support and engagement capacity.</p> <p>Funding: DWP and Jobcentre Plus funding, supported by external partner organisations.</p>	Jobcentre Plus, Norfolk County Council, DWP, Local SMEs, Local MP

Strategic Assets Policy	Borough Council Assets Acquisition and Disposal Policy.	Identify strategic sites for acquisition of disposal that align and would support delivery of priorities in WNES.	Land and property in west Norfolk made available to deliver and achieve economic outputs.	Resource: BCKLWN Officer time. Funding: To Be Determined.	BCKLWN
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Key economic monitoring indicators

Outcome	Data Source(s)	Functionality	Why it matters?
Number of new or refurbished work units delivered	Local planning completions data, regeneration activity monitoring from Planning department	Count of new workspaces (e.g. units, desks, studios) delivered through development or regeneration activity.	A rising number indicates improved business infrastructure and reduced barriers to entry for SMEs, start-ups, and self-employed workers.
Business Survival Rate	ONS Business Births, Deaths & Survival Rates, ONS Business Demography	Provides 1–5-year survival rates for enterprises	Higher survival rates indicate a stronger business environment and stable economic conditions; lower rates highlight areas that may need support or intervention.
Total Businesses	ONS Business Demography (Active enterprises), ONS Local indicators NOMIS,	Annual counts of active businesses area	Growth in the number of active businesses signals rising economic activity, more opportunities, and a stronger entrepreneurial climate.
Business birth to death ratio	ONS Business Demography, NOMIS	Uses business births divided by deaths to measure economic dynamism.	A positive ratio reflects a growing and dynamic economy; a negative ratio may point to challenges in sustaining business growth.

Strategic Priority 4: MANAGED NATURAL RESOURCES

Why this priority

Managing our natural resources proactively, efficiently and sustainably aligns directly with the Energy Security and Climate Resilience lever, supported by the Innovation, Supply Chain, and Health and Wellbeing levers on page 14. Together, these levers strengthen our ability to adapt to climate impacts, enable the transition to clean renewable energy, and ensure that households and businesses benefit from a more resilient and resource efficient local economy.

Vision 2045

In 2045 proactive, efficient and sustainable natural resource management is protecting and conserving the beautiful natural environment that makes our place. Sustainable business practices to manage natural resources efficiently have been adopted, making our economy more resilient to climate change and extreme events such as coastal erosion, flooding, and drought. Implementing circular economy principles, industrial symbiosis, decarbonisation, and the use of renewable resources is ensuring long-term environmental sustainability and energy security.

Priorities for 2026 – 2028

Over the next two years, the Borough Council will implement practical measures that help businesses and communities reduce their environmental impact and strengthen resilience to climate related risks. Through the coordinated use of the Energy Security and Climate Resilience, Innovation, and Supply Chain levers, we will encourage more efficient use of resources, support the transition to renewable energy, and work with industries to adopt low-carbon technologies and circular-economy approaches that reduce waste and operational costs.

In parallel, we will enhance our capacity to respond to coastal erosion, flooding, drought and other extreme events by improving local infrastructure and planning in collaboration with partners, landowners and environmental organisations. This approach applies the Health and Wellbeing and Policy and Regulation levers to strengthen preparedness and promote responsible stewardship of natural assets.

By advancing these actions in partnership with local stakeholders, we will help establish a more sustainable foundation for future growth whereby environmental protection, clean energy, and business resilience are mutually reinforcing. Through steady and achievable progress, West Norfolk will move toward a future where its natural assets are safeguarded, and the economy is well-prepared for emerging challenges and opportunities.

Approach

Programmes, initiatives & projects	What is happening?	2026 – 2028 Actions	Outcomes	Resourcing	Lead External Officer(s)
BKLWN Climate Change Strategy 2026 -2028	Delivering local actions to cut emissions, build resilience and manage natural assets more sustainably.	<ul style="list-style-type: none"> • Deliver all priority climate actions by Q4 2028 including transport, buildings and land use. • Hold a Business Expo in 2027. This will showcase notable practise, providing an opportunity for peer to peer networking and include carbon reduction advice [NEW]. 	Increased attention and investment in West Norfolk's natural resource management.	<p>Resource: BCKLWN Officer time.</p> <p>Funding: To Be Determined.</p>	Norfolk County Council through Climate Change Partnership
Local Nature Recovery Strategy	Setting priorities for restoring habitats, enhancing biodiversity and improving ecological networks.	<ul style="list-style-type: none"> • Identify and start delivery of 5 local habitat restoration projects targeting priority LNRS zones. • Create a coordinated water-management plan by Q4 2026. 	Growth in our water and waste sectors.	<p>Resource: BCKLWN Officer time.</p> <p>Funding: £14 million government pot for development for March 2025, alongside £50,000 seed funding per local authority.</p>	Norfolk Wildlife Trust, Norfolk County Council, Suffolk County Council
Norfolk & Suffolk Energy Plan	County wide approach to expanding clean energy generation and improving energy security.	<ul style="list-style-type: none"> • Run an annual low-carbon business programme (2026–2028) to assist at least 100 firms adopt clean technologies [NEW]. 	Increased renewable energy generation and adoption.	<p>Resource: BCKLWN & NCC Officer time.</p> <p>Funding: consisting of mostly grant provisions for households and businesses.</p>	Norfolk County Council
Norfolk Climate	Joint work across Norfolk to coordinate climate	<ul style="list-style-type: none"> • Establish and maintain a county-wide Climate Resilience 	Improved cross-county collaboration on climate resilience.	<p>Resource: Environment Agency support / Norfolk</p>	University of East Anglia, Broads Authority, NHS,

Change Partnership	mitigation, adaptation and community resilience.	plan annually (2026-2028) [NEW]		Borough & District council officer time. Funding: Environment Agency and partner-led programme funding.	Greater South East Net Zero Hub.
Hunstanton Coastal Defence Capital Works	A major capital programme to assess, design and replace/upgrade ageing coastal defences in Hunstanton following geotechnical investigations (2024–2025).	Complete the full business case and feasibility/design work by Q4 2026 [NEW] . Commence enabling works and priority structural interventions on the most at-risk sections of the promenade and seawall. (By Q1 2028.) [NEW] .	Reduced coastal erosion and flooding risk through upgraded defences engineered to modern standards.	Resource: BCKLWN Officer time / consultancy support. Funding: Unsecured.	Environment Agency, Civil Engineers, Hunstanton Town Council
Housing Retrofit	Encouraging installation of low carbon heat and community energy.	<ul style="list-style-type: none"> Complete a borough-wide housing retrofit baseline assessment by Q1 2027, identifying priority types, tenure groups, fuel-poor households and EPC performance gaps. 	<p>Increased low carbon heating adoption.</p> <p>Increased community renewable energy regeneration.</p>	Resource: BCKLWN Officer time / community engagement capacity. Funding: secured through the Norfolk Warm Homes Partnership.	Energy Providers
Norfolk Coast National Landscape	A major statutory landscape and ecological	<ul style="list-style-type: none"> Prepare and adopt an updated coast management action plan 	Strengthened coastal landscape resilience.	Resource: Norfolk Coast Partnership capacity.	Norfolk Coast Partnership

Management Plan	management plan covering parts of the Norfolk Coast, including the coastal zones of West Norfolk	by Q2 2027 including coastal resilience prioritising Hunstanton		Funding: 75% core funding secured by DEFRA and local authorities BCKLWN (25%).	
Norfolk & Suffolk Nature Recovery Partnership	The overarching partnership delivering the regional nature recovery agenda, including LNRS implementation.	<ul style="list-style-type: none"> • Pilot one joint Norfolk–Suffolk restoration project by 2028. 	Enhanced cross-border ecological connectivity.	Resource: Officer time from Norfolk & Suffolk County Councils. Funding: Norfolk & Suffolk programme funding; additional external nature-recovery funding where applicable.	Norfolk & Suffolk County Councils
Norfolk Thematic Recovery Programmes	This programme details multiple large-scale habitat recovery programmes and targeted thematic interventions.	<ul style="list-style-type: none"> • Deliver annual progress reviews (2026–2028) to monitor outcomes and redirect resources [NEW]. 	More coordinated delivery of climate, economy and resilience goals.	Resource: County Council programme management support / environment service expertise. Funding: County Council and Environment service funding, supplemented by external grants where available.	Norfolk County Council, Environment Service

Key economic monitoring indicators

Outcome	Data Source(s)	Functionality	Why it matters?
Median housing energy efficiency scores	ONS Median Energy Efficiency Score, NOMIS EPC Dataset, ONS Energy Efficiency Release	Provides consistent EPC-based efficiency scores with local authority breakdowns	Supports assessments of sustainability progress, fuel-poverty reduction, and the resilience of the local housing stock
Per capita carbon emissions within local authority	DESNZ GHG Emissions (Local Authority) ONS per capita indicator, LACA tool	Supplies authoritative per-capita greenhouse gas emissions, with optional consumption-based footprints.	Helps track how quickly the area is decarbonising, how local behaviour and infrastructure influence emissions, and where targeted action may be needed.
Total commercial and industrial emissions	DESNZ sector-level emissions, my Society LA emissions, ONS Environmental Accounts, Norfolk Insight	Provides detailed sector-specific CO ₂ / GHG emissions to track decarbonisation progress	Identifies where support or regulation may be needed, and ensures economic growth aligns with climate commitments

Strategic Priority 5: HEALTHY, INCLUSIVE COMMUNITIES

Why this priority?

Creating active, inclusive and connected communities aligns directly with the Health and Wellbeing, Transport Connectivity, and Housing / Employment Land levers, which together strengthen local access to services, reduce isolation and support improved socio-economic outcomes across the borough.

Vision 2045

In 2045 our increased housing supply in towns and villages is enabling residents to locate and stay in the area, where they have access to comprehensive health and wellbeing facilities. Isolation in rural areas has improved through better digital and transport connectivity, ensuring that all residents can participate fully in economic and community life. Residents lead active lives, with access to recreational and leisure facilities, promoting a healthier lifestyle for all.

Priorities for 2026 – 2028

Over the next two years, the Borough Council will take forward targeted actions to strengthen the conditions that support inclusive and healthy communities, particularly through embedding recommendations from Marmot. Through the application of the Housing / Employment Land lever, we will encourage the delivery of additional homes in towns and villages, enabling residents to remain close to family, employment and essential support networks. Working in partnership with health, care and community organisations, we will also utilise the Health and Wellbeing lever to improve access to local health, care and wellbeing services, ensuring that residents can receive the support they need within their own communities.

Improving both digital and physical connectivity will remain a priority, particularly in rural areas where isolation can limit participation in social, economic and community life. This will make coordinated use of the Transport Connectivity lever to enhance access to services, employment and community infrastructure.

Alongside this, we will promote opportunities for residents to lead more active and healthy lifestyles by improving access to parks, leisure facilities, community spaces and local activities—actions that align with the Health and Wellbeing lever and reinforce wider community resilience.

Through steady, collaborative action with partners, landowners and local organisations, we will support the creation of more inclusive and connected communities across West Norfolk, ensuring that residents regardless of age, background or location feel supported, engaged and able to enjoy a high quality of life.

Approach

Programmes, initiatives & projects	What is happening?	2026 – 2028 Actions	Outcomes	Resourcing / Funding requirement	Lead External Officer(s)
Marmot Programme	Embedding health equity principles across services with a focus on tackling wider determinants of health.	<ul style="list-style-type: none"> • Co-develop Marmot-aligned actions with health, housing, education and employment partners by Q4 2026 [NEW]. • Produce annual Marmot impact reports showing improvements in health equity drivers [NEW]. 	Reduction in health inequalities Stronger links between health, housing, and economic priorities.	<p>Resource: Technical support from the IHE provides tailored evidence, data analysis and expert recommendations.</p> <p>Funding: total cost of working with the Institute of Health Equity for two programmes at £150k.</p>	West Norfolk Place Board, King’s Lynn & West Norfolk Health & Wellbeing Partnership
New Queen Elizabeth Hospital	The Queen Elizabeth Hospital (QEH) in King’s Lynn is undergoing a full redevelopment, replacing the existing RAAC-affected structure with a new, digitally enabled, state-of-the-art hospital.	<ul style="list-style-type: none"> • Contractor appointment Qtr 2 2026 • Complete and submit the full business case. • Develop Social Value plan to maximise local opportunities for business growth, employment, training 	<p>Delivery of major enabling works including car park, utilities and site access routes.</p> <p>A safer interim QEH with reduced RAAC risk to staff and patients.</p>	<p>Resource: QEH, NHS England, Officer time / consultancy support to develop social value plan.</p> <p>Funding: The new QEH is backed by a £1B - £1.5B funding envelope by the government’s Health & Social Care department.</p>	Queen Elizabeth Hospital NHS Foundation Trust, NHS England

		<p>and skills through the project</p> <ul style="list-style-type: none"> • Run annual training programmes on new clinical pathways and digital systems (2027 – 2028) <p>[NEW].</p> <ul style="list-style-type: none"> • Maximise social value opportunities that local SMEs and residents can benefit from. 			
West Winch Housing Access Road	Delivery of a new strategic access road enabling the West Winch Growth Area and unlocking major housing development.	<ul style="list-style-type: none"> • Access Road Construction to start Qtr 3 2026. • Develop business case for walking/cycling connectivity and sustainable transport features across 2027–2028 <p>[NEW].</p>	Improved infrastructure enabling major housing growth.	<p>Resource: Officer time / consultancy support.</p> <p>Funding: Norfolk County Council and Homes England funding, subject to programme approvals.</p>	Norfolk County Council, Homes England
Lily – Food for Thought	Lily programme delivered by the BCKLWN. It provides free, community-based cooking and nutrition sessions.	<ul style="list-style-type: none"> • Continue delivery of Food for Thought sessions in community centres and village halls (2026-2028). 	Increased physical and mental health wellbeing among participants.	<p>Resource: Support from local chefs and demonstrators / 15 hours officer support per week during programme delivery.</p>	Paid chefs & community demonstrators and venues

		<ul style="list-style-type: none"> Secure external funding on a programme-by-programme basis, to enable continued delivery beyond existing commitments. 	Increased food security through practical budgeting, meal planning and education.	Funding: To be Determined. Entirely dependent on securing external funding.	
St George's Guildhall Learning & Engagement Programme	A programme of cultural, performances and art-based experiences and opportunities focused on bringing Shakespeare and heritage to life for schools and the community.	During the St George's Guildhall capital project delivery from 2026-2028 the activity programme is being delivered at partner venues and via outreach to schools and community groups	The creative team delivers immersive workshops, such as "Play in a Day" and Shakespeare themed sessions to engage and inspire creativity, boosting local culture, education, and supporting improved mental health and wellbeing. The programme also provides opportunities for training and volunteering.	<p>Resource: BCKLWN Officer time, Norfolk Museums Service Officer time, and volunteer support.</p> <p>Funding: UK Shared Prosperity Funding, Borough Council of King's Lynn and West Norfolk. Arts Council to be determined.</p>	Arts Council, Norfolk Museums Service
Community Development in priority KL Neighbourhoods	Working within the neighbourhoods of South and North Lynn, Gaywood and Fairstead to enable	Establishment of a Community Development Team which will by 2030 enable each	<ul style="list-style-type: none"> Increased community capacity and leadership 	<p>Resource: Community Action Norfolk, Clergy</p> <p>Funding: Pride in Place.</p>	King's Lynn Neighbourhood Board, VKL Operational Group

	resident guided investment and providing support for empowered communities that can enable and sustain change.	neighbourhood to have: <ul style="list-style-type: none"> • A Community Forum and Youth Forum • A VCFSE Hub coordinating local partners • A community owned Neighbourhood Action Plan • A cross-neighbourhood Children's, Youth & Families (CYF) learning network 	<ul style="list-style-type: none"> • Reduced duplication of services • Guides alignment of investment with community priorities • Stronger preventative ecosystem • Improved outcomes for children, young people and families • Enhanced trust and engagement between residents and services 	Funding: Pride in Place programme.	
Sport England Expansion Programme – West Norfolk	The Programme targets communities in the highest deciles for inactivity, deprivation, social need and health inequality, using a long-term, place-based	<ul style="list-style-type: none"> • Deliver targeted community-led physical activity programmes, prioritising groups with the lowest activity levels. • Improve access to local facilities and 	<p>Higher levels of regular physical activity among residents.</p> <p>Reduced health inequalities and improved physical</p>	<p>Resource: delivery is community-led and partnership based.</p> <p>Funding: from Sport England's £250m national</p>	Sport England, Active Norfolk

	approach to increase physical activity and improve wellbeing.	spaces, supporting upgrades to informal activity assets, green space use and links to active travel routes.	and mental wellbeing.	Place Expansion investment.	
Leisure services study	The Leisure Services Study is an evidence-based review of leisure, sport and physical-activity provision across West Norfolk (such as sports centres, swimming pools, community halls and outdoor assets).	<ul style="list-style-type: none"> • Complete and adopt the Leisure Services Study by 2026, including options for replacement pool facilities at Lynnsport [NEW]. • Use the Study to support funding bids, including Sport England, place-based programmes and capital regeneration funding [NEW]. 	<p>More efficient and sustainable leisure facilities that meet future demand.</p> <p>A clear, evidence-led framework guiding leisure and sport investment decisions.</p>	<p>Resource: BCKLWN Officer time / consultancy support.</p> <p>Funding: To Be Determined.</p>	Sport England, Active Norfolk
Active Travel Hubs + Operational Plan	The hubs provide secure, high-quality facilities to support walking, cycling and public transport use, including secure cycle parking, e-bike and e-scooter charging, lockers, EV charging and edge-of-centre parking. The accompanying Operations Plan sets out how the hubs will	<ul style="list-style-type: none"> • Agree and implement a formal Operations Plan by 2026, covering opening hours, security, cleaning, maintenance, usage monitoring and responsibilities [NEW]. • Review and refresh the Operations Plan annually, responding to demand, user 	<p>Increased use of active and sustainable travel into King's Lynn.</p> <p>Reduced congestion and improved air quality around the town centre.</p>	<p>Resource: BCKLWN Officer time / consultancy support.</p> <p>Funding: Towns Fund.</p>	Norfolk County Council

	be managed, maintained, promoted and integrated into wider transport, health and regeneration initiatives once built.	feedback and wider transport changes [NEW] .			
Purfleet Pantry Relocation to South Lynn Community Centre	The Borough Council is proposing to grant a long-term lease of the South Lynn Community Centre (SLCC) to the Purfleet Trust, subject to legal and property due diligence, with a target start date of 1 June 2026.	<ul style="list-style-type: none"> • Approve and complete the long-term lease by mid-2026, following Cabinet and Full Council approval. • Relocate and operationalise the Purfleet Pantry at SLCC by Q4 2026, ensuring continuity of service for overactive members. 	<p>Increased access to affordable food, skills and wellbeing support in one of King's Lynn's most deprived neighbourhoods.</p> <p>Secured long-term future of the Purfleet Pantry and associated support services.</p>	<p>Resource: Operational and maintenance costs of the centre transfer to the Purfleet Pantry under the Lease.</p> <p>Funding: BCKLWN contribution is primarily asset-based rather than ongoing revenue funding.</p>	Purfleet Pantry
Housing Needs Assessment	Ongoing assessment of current and future housing requirements across West Norfolk.	<ul style="list-style-type: none"> • Publish updated Housing Needs Assessment annually (2026–2028) using refreshed demographic, affordability and market data • Identify gaps in housing types and specialist provision by 	<p>Clear understanding of changing housing needs.</p> <p>Better targeting of housing delivery and regeneration activity.</p>	<p>Resource: BCKLWN Officer time.</p> <p>Funding: BCKLWN core funding with external partner support from Freebridge and Norfolk County Council.</p>	Freebridge, Norfolk County Council

		Q3 2026 and update this analysis each year			
King's Lynn Steering Group as part of Culture & Heritage Strategy	Operational group of representatives that supports the objectives of the King's Lynn Culture & Heritage Strategy.	<ul style="list-style-type: none"> • Increase creative-industry work experience placements by 50% by 2028, working with cultural partners, and education providers [NEW]. 	Enhanced engagement with local communities and diverse groups.	<p>Resource: BCKLWN Officer time.</p> <p>Funding: To Be Determined.</p>	The Garage, Creative Arts East, Arts Council, Historic England
Alive West Norfolk Capital Investment Strategy	Investment in leisure, sport and wellbeing facilities across the borough.	<ul style="list-style-type: none"> • Deliver a phased upgrade of major leisure centres by Q4 2027, improving accessibility and modernising facilities [NEW]. 	<ul style="list-style-type: none"> • Healthier, more active communities • Improved quality of local leisure infrastructure 	<p>Resource: BCKLWN Officer time.</p> <p>Funding: includes over £600k from the UKSPF, alongside £225,000 rural community grant.</p>	Community Action Norfolk
Public Realm Infrastructure - Hostile Vehicle Mitigation	<ul style="list-style-type: none"> • Develop annual public-realm security improvement plan with Norfolk County Council and Norfolk police 	<ul style="list-style-type: none"> • Complete risk assessments for priority town-centre sites by Q4 2026. • Develop annual public-realm security improvement plan with NCC and police. 	Enhanced public safety and reduced vulnerability to threats	<p>Resource: Officer time / Norfolk Police support.</p> <p>Funding: To Be Determined.</p>	Norfolk Police, Norfolk County Council
West Norfolk Youth Offer	Youth work, wellbeing, skills and monitoring	<ul style="list-style-type: none"> • Ensure the Youth Advisory Board representation is fed into key strategies and programmes (e.g., skills, wellbeing, community safety) at least twice per year. 	<p>Improved youth wellbeing, skills and aspirations.</p> <p>Stronger youth voice influencing local priorities</p>	<p>Resource: BCKLWN Officer time / Youth workers and delivery staff across partner organisations.</p> <p>Funding:</p>	Youth West Partnership, Schools, NCC Children's Services

			and service design.	Norfolk County Council, External grant funding.	
Integrated Transport & Accessible Mobility Programme	Improving access for residents without private transport	<ul style="list-style-type: none"> • Create borough-wide transport accessibility map by Q3 2026 to identify gaps. • Increase access to key services (healthcare, jobs) by 2028 through improved routes and partnerships. 	Reduced transport barriers and improved access to services.	Resource: BCKLWN Officer time. Funding: Funding schemes from Norfolk County Councils.	Transport Operators, Norfolk County Council, Community Transport Providers
Visit East Anglia LVEP	The Suffolk and Norfolk Local Visitor Economy Partnership was setup to be the major official destination management organisation attracting visitors to East Anglia in partnership with local authorities and place promotion organisations.	<ul style="list-style-type: none"> • Maximise opportunities to promote WN in marketing and promotional activities delivered by the LVEP. • Publish an annual LVEP Performance Report (2026, 2027, 2028) measuring visitor numbers, footfall impact, economic impact (GVA uplift) and business satisfaction [NEW]. 	To increase footfall and boost the economy through the tourism industry across Suffolk and Norfolk counties.	Resource: BCKLWN Officer time / External partner capacity. Funding: To be determined	Norfolk County Council, Suffolk County Council, Business membership
King's Lynn Walsingham Way Project	A modern 29-mile pilgrim trail from King's Lynn to	<ul style="list-style-type: none"> • Publish an annual impact report (2026, 2027, 2028) tracking 	Linking active travel, rural businesses and	Resource:	St. Margaret and St. Nicholas Parish Trust charity,

	Walsingham is currently under rigorous testing and will soon be launched to promote physical and spiritual wellbeing, green tourism, heritage discovery and support village businesses along the route.	physical activity, wellbeing benefits, visitor numbers, rural business spend and community engagement [NEW] .	spiritual/wellbeing tourism for King's Lynn to Little Walsingham: a brand new and extensive pilgrim route leading from the town of King's Lynn to Walsingham.	BCKWLN Officer time / partner organisation capacity. Funding: Applications to small heritage and theological grant providers, including the King's Lynn Town Guides.	Walsingham Abbey and The Shrine of Our Lady at Walsingham, Catholic Church of Walsingham
Denver Sluice Complex	Longstanding active sluice and leisure mooring service along the River Great Ouse, Environment Agency wish to explore the transformation of the Denver Sluice into a new visitor hub.	<ul style="list-style-type: none"> • Secure multi-partner funding (EA + tourism SMEs) by 2027 to deliver improvements including mooring upgrades, visitor facilities and rebranding [NEW]. • Publish annual visitor-impact and environmental management reports (2026 – 2028) covering footfall, biodiversity considerations and economic impact [NEW]. 	A gateway to the Fens. Enhances the visitor sailing offer, increase on-site facilities for visitors, a potential rebrand of the site and regenerated interpretation boards to increase footfall and visitor flow.	Resource: BCKLWN Officer time. Funding: to be secured through Environment Agency and operational partners.	Environment Agency, Local tourism SMEs,
West Norfolk Age Friendly Community	Development of a Borough-wide Age-friendly community approach, aligned	• Support small-scale age-friendly pilot initiatives (2027–2028) where officer capacity	Improved health, wellbeing and independence for older residents.	Resource: BCKLWN Officer time.	Public Health Norfolk

	with the Centre for Ageing Better Age-friendly Communities framework, to support older residents to remain healthy, independent and engaged for longer, while reducing pressure on health and care systems.	allows, focusing on social connection, physical activity and access to services [NEW] .	Contribution to reduced demand on health and care services over time.	Funding: To Be Determined.	
Vision for Volunteering (West Norfolk)	Development of a shared Vision for Volunteering in West Norfolk, working with the VCSE sector, DWP and Voluntary Norfolk to increase volunteering participation, strengthen pathways into employment and support community capacity.	<ul style="list-style-type: none"> • Establish a volunteering working group by Q4 2026, involving VCSE partners, Voluntary Norfolk, DWP and public sector organisations [NEW]. • Support annual volunteering promotion activity (2027 – 2028) aligned to national campaigns, e.g., Volunteers Week [NEW]. 	<p>Clearer pathways from volunteering into skills, employment and wellbeing support.</p> <p>Increased number and diversity of volunteers across West Norfolk.</p>	<p>Resource: BCKLWN Officer time.</p> <p>Funding: To Be Determined.</p>	VCSE partners, DWP, Voluntary Norfolk
Social Value Framework within projects	Maximise social, economic, and environmental benefit from all council-led investment, capital	<ul style="list-style-type: none"> • Train project managers and suppliers to implement more into projects [NEW]. 	Stronger delivery and integration with other BCKLWN programmes.	Resource: BCKLWN Officer time / external partner capacity.	Major Contractors, Design & Masterplanning Partners, Norfolk County Council

	projects, grants and procurements.	<ul style="list-style-type: none"> Engage with major projects i.e. New Hospital Programme, to maximise social value delivery in West Norfolk [NEW]. 		Funding: no funding required.	
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Key economic monitoring indicators

Outcome	Data Source(s)	Functionality	Why it matters?
More GPs / Service Providers per Population	HoC GP's Dashboard, NHS GP Workforce, RCGP, West Norfolk Primary Care Network	Tracks GP numbers, FTE, and population ratios key access metrics.	Highlights where the ageing population and pressure, supports planning for growth and ageing, and ensures fair access to primary care.
Improved Neighbourhood Health Indicators	OHID Health of the Region; ONS Local Indicators; Fingertips Health Profiles; Health Foundation Dashboard	Provides detailed, neighbourhood-level public health indicators.	Help target resources, improve local services, and address inequalities that affect residents' ability to participate fully in community and economic life.

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Find out more about the West Norfolk Economic Strategy



economic.development@west-norfolk.gov.uk





REPORT TO CABINET

DATE OF MEETING	9 June 2026
REPORT TITLE	KING'S LYNN AND WEST NORFOLK NEW LOCAL PLAN – GOVERNANCE ARRANGEMENTS FOR THE PLAN-MAKING PROCESS
LEAD MEMBER	Cllr James Moriarty
LEAD OFFICER	Michael Burton (Principal Planner)
CONSULTEES	Assistant Director (Environment and Planning), Planning Policy Manager, Chief of Staff, Democratic Services Manager, Principal Lawyer
WARDS AFFECTED	

KEY DECISION	YES/NO
DECISION MAKER	Cabinet
IS THE REPORT OPEN OR EXEMPT	OPEN/EXEMPT

FINANCIAL IMPLICATIONS	YES/NO
HR IMPLICATIONS	YES/NO
POLICY IMPLICATIONS	YES/NO
STATUTORY IMPLICATIONS	YES/NO
RISK MANAGEMENT IMPLICATIONS	YES/NO
ENVIRONMENTAL IMPLICATIONS	YES/NO
EQUALITY IMPACT ASSESSMENT COMPLETED	PRE-SCREEN COMPLETED BUT FULL EIA NOT REQUIRED

SUMMARY OF REPORT
<p>The new system for plan-making came into force on 25 March 2026. This sets a statutory 30-months timetable for preparation of the Local Plan, plus 4-months advanced notice, with the formal launch of the Local Plan made through a statutory notice of intention (NoI).</p> <p>The timescales and milestones within the process are set out in law and are therefore non-negotiable. Given this there is a need to agree how this is to be achieved in accordance with the Borough Council's decision-making processes.</p> <p>The 30-months timetable is extremely challenging, so would require most decisions to be taken through delegated powers. This report sets out how the Council's Scheme of Delegation should be applied to the plan-making process. This would enable the legal timescales and milestones within the plan-making process to be met and ensure the appropriate political governance and oversight is in place.</p>



RECOMMENDATIONS

Cabinet resolves to:

1. Approve the Governance arrangements for the plan-making process, in accordance with the December 2025 Scheme of Delegation.

REASON FOR DECISION

To ensure the Council meets the deadlines, requirements and statutory obligations of the new plan-making system, as introduced through the Levelling-Up and Regeneration Act (2023), the Planning and Infrastructure Act (2025) and the associated plan-making regulations introduced in 2026.

CORPORATE STRATEGY

How does this proposal support our Corporate Priorities [Our priorities | Corporate Strategy 2023 - 2027 | Borough Council of King's Lynn & West Norfolk](#)

Promote growth and prosperity to benefit West Norfolk	Preparing an up-to-date Local Plan is necessary to achieving sustainable development. The national definition for sustainable development (National Planning Policy Framework, paragraph 8) includes an economic objective, whereby the Local Plan needs to incorporate policies to ensure that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.
Protect our Environment	The Local Plan needs to include policies to protect and enhance the natural, built and historic environment. The National Planning Policy Framework (NPPF) includes an environmental objective, which includes making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.
Efficient and effective delivery of our services	n/a
Support our communities	The Local Plan will include policies for delivering housing (of the correct type and in appropriate locations) and community infrastructure. These will contribute towards fulfilling the NPPF social objective, to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed places with accessible services and open spaces.

1 Introduction



- 1.1 The Government, through the new planning system, legally requires Local Plans to be prepared within a 30-months timetable, plus 4 months in advance for issuing the Nol (official start of Local Plan preparation) and undertaking a preliminary Scoping consultation. The formal launch of the Local Plan will be accompanied by the following:
- Notice of intention (**Nol**) to commence Local Plan preparation;
 - Project Initiation document (**PID**);
 - Local Plan Timetable (**LPT**); and
 - Details of how consultation and engagement for the plan-making will be undertaken.
- 1.2 The Town and Country Planning (Local Planning) (England) Regulations 2026 were published on 3 March 2026. These Regulations came into force on 25 March 2026, when the new plan-making system, as instigated through the 2023 Levelling-Up & Regeneration, and 2025 Planning & Infrastructure Acts, became “live”. The Government (Ministry of Housing, Communities and Local Government) has already written to the Borough Council, specifying that the Borough Council will be in the first tranche of local planning authorities, requiring publication of our Nol by 30 June 2026 (Appendix 1, below).

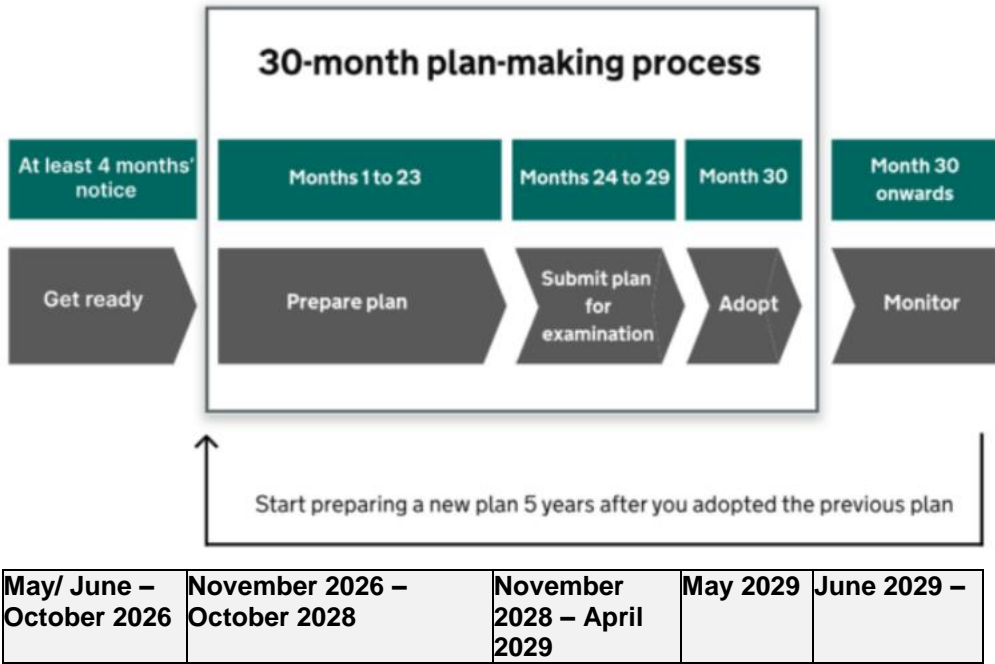
2 Background

- 2.1 The new planning system introduces many significant changes, particularly regarding plan-making. These represent the most significant changes to the system for over 20 years; notably:
- Statutory deadlines/ milestones for preparing a Local Plan (30 months, from start, to publication of Inspectors' Report);
 - Replacement of Local Development Scheme with a Local Plan Timetable and the introduction of a project initiation document;
 - Removal of statutory requirement to prepare a Statement of Community Involvement (SCI);
 - Replacement of Supplementary Planning Documents with Supplementary Plans; the latter requiring independent examination;
 - Removal of statutory “Duty to Cooperate”;
 - Use of digital technology in plan-making;
 - Removal of requirement to undertake Sustainability Appraisal (although Strategic Environmental Assessment will remain a statutory obligation).



2.2 The Government has already produced some guidance about the new plan-making process (<https://www.gov.uk/guidance/30-month-local-plan-process-an-overview>). The diagram below, extracted from the process guidance, shows the 30-months timeframe and how this would translate into the LPT for the new Local Plan.

Process overview



2.3 The legislation requires the Local Plan Timetable to specify dates for reaching key milestones in the plan-making process (2026 Local Planning Regulations, Regulation 4). The need to specify dates is a new legal obligation for the Borough Council (Appendix 2, below).

2.4 The implications of Regulation 4 are that the LPT needs to fulfil these statutory deadlines. **Failure to meet these deadlines may lead to Government intervention in the plan-making process.** Recent actions by the Ministry of Housing, Communities and Local Government have indicated the Government would not be averse to intervening to ensure the Local Plan is delivered in a timely way.

2.5 As a recent example, the Minister of State for Housing and Planning, Matthew Pennycook MP, wrote to Three Rivers District Council (18 March 2026) about their Local Plan Council ([Three Rivers District Council: Local Plan Intervention letter - GOV.UK](#)), (Appendix 3, below) as follows:

“It is my firm view that the available evidence demonstrates that the Council’s Regulation 19 draft plan fails to propose allocating all appropriate housing sites available that could contribute towards meeting housing need”, concluding that “the plan [as submitted, with the supporting evidence base] is



unsatisfactory and that the Council is failing to do something necessary in respect of preparing the local plan. This meets the statutory test for intervention under section 21 and 27 of the 2004 [Planning and Compulsory Purchase] Act". In the letter, the Minister also directed Three Rivers District Council to allocate 7 additional sites, to meet at least 85% of the defined local housing need.

- 2.6 Under most legislation, going back many decades, the Secretary of State (on behalf of the Government) has held extensive powers of intervention in the planning system. However, these have always been intended to cover all eventualities, and it was always extremely unlikely that these powers would ever be invoked.
- 2.7 Notwithstanding, the 2026 Regulations set statutory deadlines for producing a Local Plan. It is reiterated that, if these target deadlines are not met, then the Secretary of State could intervene and remove responsibility for plan-making from the Council. The Three Rivers letter strongly indicates that the Government is more likely to intervene in the process than has been the case in the past.

Role and function of the Local Plan Task Group

- 2.8 When the current Local Plan 2021-2040 was being prepared (October 2016 – March 2022) and examined (March 2022 – February 2025), this required regular meetings of the Local Plan Task Group (**LPTG**), to consider and advise the executive (Cabinet) when decisions were necessary for the plan to proceed. Each time a Cabinet decision was needed, this required a significant lead-in time (6-7 weeks); as well as the need to go before the scrutiny panels, often both R&D and E&C committees.
- 2.9 The new 30-months statutory timeframe for the Local Plan preparation means that **it is virtually impossible to continue the approach previously applied to preparation of the Local Plan, if the legal deadlines are to be met.** Therefore, it is necessary to put in place robust mechanisms for the day-to-day governance of the plan-making process. It is recognised that key stages will require authorisation by Cabinet and/ or Full Council, but day-to-day decision-making ought to be the responsibility of the Assistant Director, advised by the LPTG.
- 2.10 The LPTG effectively functions as a proxy Member Panel, given that it is appointed by, and reports directly to, Cabinet and the Portfolio Holder for Planning and Licensing. Furthermore, the Portfolio Holder is chair for the LPTG, with the Task Group itself meeting in public (both broadcasted and minuted). It is therefore emphasised that there should be no need for this process to be repeated through the Environment and Community, and/ or Regeneration and Development Panels.
- 2.11 Updated Terms of Reference for the LPTG were agreed by Cabinet on 23 April 2026, which should help to streamline the plan-making process.



Relevant aspects of Council's Scheme of Delegation (December 2025)

- 2.12 The Scheme of Delegation (**SoD**) is regularly reviewed and updated; its most recent iteration being agreed in December 2025. The SoD already provides a framework for day-to-day decision making on behalf of the Council. This report will focus upon where the portfolio holder and/ or relevant Chief Officer (for the Local Plan; the Assistant Director, Environment and Planning) have specific delegated powers that are relevant to plan-making (Appendix 4, below).
- 2.13 The SoD includes a range of functions relevant to Local Plan preparation that are delegated to individual portfolio holders. In turn, many day-to-day matters are further delegated to relevant officers. The Local Plan will cover many matters that are relevant to various different portfolio holders. However, the portfolio holder for Planning and Licensing is the lead contact for the Local Plan, given that this is explicitly referenced at paragraph 3.1 of the SoD.

3 Proposal

Application of the SoD to Local Plan preparation

- 3.1 The SoD states throughout that day-to-day management and implementation of policy is delegated to the Chief Executive and/ or relevant Chief Officer. In the case of the Local Plan, that is the Assistant Director for Environment and Planning.
- 3.2 The Local Plan Task Group was first established by Cabinet in 2011 to allow Members with an interest in the Local Plan to be actively involved in the plan-making process. Although it does not have specific decision-making powers, it has continued to advise Cabinet, the portfolio holder and officers, to ensure continued political engagement in the Local Plan. This function will continue for the new Local Plan, as illustrated by the new/ updated Terms of Reference for the Task Group, agreed by Cabinet on 23 April 2026.
- 3.3 It is reiterated that the Task Group (like Member Panels; e.g. Regeneration and Development Panel) meets in public, with the proceedings broadcast and meetings formally minuted. Individual Members, over and above those appointed to the Local Plan Task Group, have the opportunity to attend and participate in meetings, under Standing Order 34.
- 3.4 Accordingly, significant decisions regarding the direction of the Local Plan will be made through the Local Plan Task Group, advising the portfolio holder and officers. Task Group meetings can be set up relatively quickly and, on an ad hoc basis, as and when necessary. This means there is no need for extensive lead-in times (unlike for Cabinet and supporting Panels), which could undermine the LPT (statutory) deadlines.
- 3.5 In practice, day-to-day agreements/ resolutions regarding the Local Plan will need to be taken by a combination of Task Group, portfolio holder and/ or officer delegated decisions. This is entirely dependent upon the



consequential or material implications of individual decisions. Decision-making broadly fits into the following categories (Appendix 5, below):

- Operational matters;
- Minor consequential amendments to existing policies;
- New policies, or significant policy changes.

LGR

- 3.6 For completeness, it is anticipated that LGR will come into effect on 1 April 2028, in the course of the Regulation 27 consultation (see below), and the subsequent stages of Local Plan formation would be taken forward by the new West Norfolk unitary authority.
- 3.7 New governance structures will likely be implemented in due course to address this. However, the current proposals are necessary in any event.

Local Plan Timetable: Key milestones and proposed level of decision

- 3.8 In developing the Local Plan Timetable, officers have considered which level of decision should be taken for each milestone. Appendix 6 (below) provides an explanation as to how decisions should be taken at each stage, in relation to the key milestones in the process (as defined by the 2026 Regulations).
- 3.9 Nevertheless, Cabinet approval is needed for key consultation stages; e.g. Regulations 20 and 27. As key decisions, full Council approval is only needed for adoption by the West Norfolk unitary authority (Regulations 19 and 39 respectively). Appendix 6 explains that decisions for all other stages in the process will be taken by a combination of Member and/or officer delegated decisions, as appropriate. However, all decisions will be overseen by the Local Plan Task Group.
- 3.10 Overall, operational decisions for technical matters such as procurement of external expertise would normally be taken as officer delegated decisions. Where a policy direction would need to be agreed, in most instances this would be taken by the portfolio holder, under recommendations of the Local Plan Task Group. Member Delegated decisions may also be required (potentially subject to call-in) on occasions, on matters of specific urgency.
- 3.11 There is also the provision in the Council's Constitution (Part 4, Standing Orders, paragraph 12.15) to take decisions through without the availability of call-in if they are deemed to be Urgent if needed. However, it is still important that we keep Members informed, as far as possible. Although this emergency power may be useful, it does not circumvent the long (6-8 weeks) lead-in time for taking reports to Cabinet. Therefore, it remains critical that day-to-day decision making for the Local Plan is delegated to the Local Plan Task Group, portfolio holder and/ or Chief Officers (in accordance with the SoD).



4 Options Considered

- 4.1 The mechanisms for taking decisions in preparing the Local Plan 2021-2040 (adopted March 2025) were ad-hoc. In the early stages of plan-making (2016-2020), the process was led by the Local Plan Task Group, although this group does not have any formal decision-making powers.
- 4.2 Consideration has been given as to whether it is necessary to clarify/ explicitly define how decisions could be taken for Local Plan preparation under the new system, or whether the existing ad-hoc arrangements are sufficient. The latter was not considered a reasonable alternative option, given the new legal obligations such as strict statutory deadlines/ milestones that it is necessary to adhere to.
- 4.3 Effectively if the legal timescales for Local Plan preparation are to be met there is no other option than what is being proposed. This would ensure timescale and milestones are met and the process accords with the Borough Council's Scheme of Delegation.

5 Financial Implications

- 5.1 There are no financial implications arising directly from this report. Preparation of a new Local Plan is a statutory obligation and ensuring efficient and appropriate arrangements and procedures in place is necessary to achieve this outcome.
- 5.2 Budgets for preparing a new Local Plan have recently been agreed. Funds have been set to accord with the streamlined 30-months timetable for preparing the new Local Plan, as required by the new system.

6 HR Implications

- 6.1 There are no HR implications.

7 Policy Implications

- 7.1 The proposed governance arrangements for preparation of the new Local Plan are needed to support efficient and effective plan-making, under the new planning system (as introduced through the 2023 Levelling-Up & Regeneration Act (LURA), 2025 Planning & Infrastructure Act (P&IA) and associated 2026 Regulations).
- 7.2 Clear and efficient governance arrangements are critical to ensure the Borough Council can undertake plan-making in accordance with the statutory requirements. These are ultimately about positive planning; i.e. delivering a new Local Plan under the reformed system for plan-making.
- 7.3 When adopted, the new Local Plan will replace the current Local Plan 2021-2040. This will provide the necessary statutory spatial planning framework for



nearly 20 years ahead, up to the mid-2040s.

The proposed governance arrangements are important to achieve timely adoption of the new Local Plan.

8 Climate Change and Environmental Implications and considerations

- 8.1 There are no direct environmental considerations. However, delivery of an effective Local Plan in accordance with the necessary legal requirements ought to achieve positive environmental outcomes.

9 Statutory and Legal Implications

- 9.1 The preparation and adoption of an up-to-date Local Plan within a 30-month timetable is a statutory obligation, under the following legislation:

- 2023 Levelling-Up and Regeneration Act (LURA), which introduced significant changes to the planning system, including statutory deadlines for accelerated plan-making and national development management/ decision-making policies;
- 2025 Planning and Infrastructure Act (P&IA), which introduced new powers for plan-making, with reference to utilities, National Strategic Infrastructure Projects (NSIPs), planning fees and delegation of decision making
- The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026
- Town and Country Planning (Local Planning) (England) Regulations 2026

- 9.2 The 2026 Regulations “turned-on” the new planning system, with effect from 25 March 2026. This entails the establishment of robust and efficient governance arrangements to deliver the new Local Plan within the statutory timeframe.

10 Local Government Reorganisation Implications

- 10.1 It is anticipated that LGR will come into effect on 1 April 2028. Therefore, it is expected that the subsequent stages of Local Plan formation will be taken forward by the new West Norfolk unitary authority.
- 10.2 New governance structures will likely be implemented in due course to address this. However, the current proposals are necessary in any event.

11 Health and Safety Implications

- 11.1 There are no health and safety implications.

12 Consultees

- 12.1 In addition to the lead Member (Cllr James Moriarty), the following officers have been consulted and/ or engaged in preparing this report:



- Assistant Director, Environment and Planning;
- Planning Policy Manager;
- Chief of Staff;
- Democratic Services Manager; and
- Principal Lawyer.

12.2 This report is directed internally, given that it relates to internal processes (governance) and the Council's constitution (specifically the Scheme of Delegation). The process of engaging internal consultees focuses upon ensuring that the governance arrangements for preparing a new Local Plan under the newly implemented system correctly align with the Scheme of Delegation (December 2025).

12.3 Notwithstanding, wider public consultation and engagement is fundamental to plan-making. A consultation strategy will be developed and finalised following the preliminary Scoping Consultation, September 2026 (Regulation 20).

13 Equality Impact Assessment

(Pre screening report template attached)

13.1 The EIA Pre-Screening process has revealed no negative impacts arising from the proposed governance arrangements for the plan-making process. The completed Pre-Screening EIA form is attached.

14 Risk Management Implications

14.1 Preparation of a Local Plan in accordance with the statutory timetable is about fulfilling the Borough Council's legal functions. There could be risks of sanctions upon the Council if we fail to meet our legal obligations.

15 Conclusions

15.1 The launch of the new Local Planning system, with effect from 25 March 2026, requires the Council to prepare a new Local Plan within a mandatory 30-months timeframe. To ensure this can be achieved expediently, it is therefore necessary that clear governance arrangements are in place to meet the various statutory deadlines set out in the Town and Country Planning (Local Planning) (England) Regulations 2026.

15.2 This report has been prepared within the overall framework set by the Council's Scheme of Delegation (December 2025). It explains how the Scheme of Delegation should apply to the process of preparing a new Local Plan for the Borough. It utilises a red/ amber/ green notation (appendices 5 and 6, below), to explain the level at which decisions will be taken during the plan-making process:

- Red: Cabinet and/ or Council level decision;



- Amber: Member Delegated Decision; or
- Green: Officer Delegated (operational) Decision.

16 Background Papers

- 16.1 Borough Council Constitution, March 2026: Part 3 (Scheme of Delegation) and Part 4 (Standing Orders):

<https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=429&Mid=2220&Ver=4&bcr=1&info=1>



LIST OF APPENDICES

- Appendix 1: “support for early starters” letter, 15 January 2026
- Appendix 2: The Town and Country Planning (Local Planning) (England) Regulations 2026, Regulation 4
- Appendix 3: Minister of State for Housing and Planning letter to Three Rivers District Council about their Local Plan, 18 March 2026
- Appendix 4: Scheme of Delegation (December 2025) – relevant sections/ paragraph references for Local Plan preparation
- Appendix 5: Decision-Making Structures – Levels at which individual decisions can be taken
- Appendix 6: Local Plan Timetable: Key milestones and proposed level of decision

LIST OF BACKGROUND PAPERS

Borough Council Constitution, March 2026: Part 3 (Scheme of Delegation) and Part 4 (Standing Orders):

<https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CIId=429&Mid=2220&Ver=4&bcr=1&info=1>

PRE SCREENING EQUALITY IMPACT ASSESSMENT

For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	King's Lynn and West Norfolk new Local Plan – Governance arrangements for the plan-making process			
Is this a new or existing policy/service/function? (<i>tick as appropriate</i>)	New	<input type="checkbox"/>	Existing	X
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 and identify relevant legislation.	<p>The implementation of the new planning system from March 2025 through the 2023 Levelling-Up and Regeneration Act, 2025 Planning & Infrastructure Act, and associated Regulations, requires effective governance arrangements for efficient decision-making.</p> <p>It remains necessary to ensure public engagement and transparency in the plan-making process. However, there are statutory deadlines and milestones that need to be met at all stages in preparation of the Local Plan.</p> <p>Day-to-day decision-making for the local is divided between Cabinet, the Local Plan Task Group, Portfolio Holder for Planning and Licensing and officers, as appropriate.</p>			



	<p>This report provides clarification and explanation for how the current (March 2026) Borough Council's Constitution (particularly the Scheme of Delegation) should apply to plan-making, in order to meet the Council's legal obligations.</p> <p>Other key legislation that plan-making needs to accord with, include:</p> <ul style="list-style-type: none"> • 2018 Data Protection Act; • 2017 Habitat Regulations (as amended); • 2010 Equality Act; • 2004 Environmental Assessment of Plans and Programmes Regulations; • 1998 Human Rights Act.
<p>Who has been consulted as part of the development of the policy/service/function? – new only <i>(identify stakeholders consulted with)</i></p>	<p>The report relates to internal processes and procedures, as set out in the Council's Constitution (March 2026). These are essential to ensure the Local Plan can be prepared in a timely and efficient manner and (critically) fulfil statutory deadlines and milestones.</p> <p>In preparing this report, the following stakeholders have been consulted:</p> <ul style="list-style-type: none"> • Corporate Governance, Democratic Services, Legal Officers • Portfolio Holder for Planning and Licensing <p>It is emphasized that the report seeks to clarify existing arrangements, to allow for preparation of a new Local Plan under the new system (which came into force in March 2026).</p>

Question	Answer
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<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>		Positive	Negative	Neutral	Unsure
	Age			X	
	Disability			X	
	Sex			X	
	Gender Re-assignment			X	



<p>Please tick the relevant box for each group. NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p> <p><i>*For more information on health inequalities please visit The King's Fund</i></p>	Marriage/civil partnership			X	
	Pregnancy & maternity			X	
	Race			X	
	Religion or belief			X	
	Sexual orientation			X	
	Armed forces community			X	
	Care leavers			X	
	Health inequalities*			X	
	Other (eg low income, caring responsibilities)			X	

Please provide a brief explanation of the answers above:

Preparation of the Local Plan is a legal obligation upon the Borough Council. The plan-making process is covered by a range of primary and secondary legislation, including the 1998 Human Rights Act and 2010 Equality Act. The Local Plan is intended to address all aspects (economic, environmental and social) of sustainable development and deliver benefits for all communities and groups. To pass examination, it will be necessary to demonstrate that the Local Plan fulfils our legal obligations re the Human Rights and Equality Acts.

Effective and efficient governance arrangements are necessary to ensure successful delivery of a new Local Plan within the statutory timeframe.

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	Yes / No	n/a – No negative impacts identified
3. Could this policy/service be perceived as impacting on communities differently?	Yes / No	n/a – No negative impacts identified
<p>If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>		



4. 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	Actions: n/a – No negative impacts identified	
		Actions agreed by EWG member:	
5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes/ No	Please provide brief summary: The new Local Plan is intended to deliver benefits for all communities, in terms of sustainable development. It is noted that secondary benefits for people could be achieved, through effective governance arrangements, to ensure effective and timely delivery of the Plan.	
Assessment completed by: Name	Michael Burton		
Job title	Principal Planner (Planning Policy)		
Date completed	17 March 2026		
Reviewed by EWG member	Claire Dorgan	Date	5 May 2026
✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)			



OFFICIAL



*Arthur Young
Deputy Director*

**Ministry of Housing,
Communities &
Local Government**
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

www.gov.uk/mhclg

Email:
localplanfunding@communities.gov.uk

15 January 2026

Dear Chief Executive,

Implementation of reforms to the plan-making system – support for early starters

I am writing as your local authority submitted a plan for examination on, or before, 12 March 2025 and the housing requirement in the plan as submitted for examination was meeting less than 80% of local housing need, calculated using the standard method in national planning practice guidance 2024 [link](#). You will, therefore, be required to start a local plan early in the new plan-making system by publishing your notice to commence plan preparation by 30 June 2026 and publishing your Gateway 1 self-assessment by 31 October 2026.

I would like to offer your local authority support to help meet this timeframe. The Government has recently announced a minimum of £14 million for plan-making and part of that is specifically for authorities who begin a plan early in the new system. Further detail of the fund and the expression of interest form can be found [here](#). Your authority could access in the region of £120,000, although the funding awarded could be more or less than this amount.

If you wish to apply for this funding please **submit an expression of interest by the deadline 17:00pm on 28 January 2026**. If you have any questions regarding the funding, please email: localplanfunding@communities.gov.uk

Separately, we would also like to offer your officers a meeting to discuss any questions you have on commencing work on your new local plan and how we can most effectively support you to do so. If you would like to meet please select one of these [appointments](#).

Yours sincerely,

Arthur Young
Deputy Director – Development Plans

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**Appendix 2: The Town and Country Planning
 (Local Planning) (England) Regulations 2026,
 Regulation 4**

Regulation 4 requires the following dates to be specified in the LPT. The LPT operates as a live operational document and is required to be updated at least every month and when key milestones are reached.

Regulation 4 (relevant para)	Requirement	Associated Regulation
4(1)(a)	Date of notice of intention to commence Local Plan preparation	Regulation 19
4(1)(b) and (c)	Dates for scoping consultation	Regulation 20
4(1)(d)	Date on which Local Planning authority will make their self-assessment summary (in advance of Gateway 1, when the 30-months timetable will start)	Regulation 21
4(1)(e) and (f)	Dates for notice of plan content and evidence consultation (first draft Local Plan consultation)	Regulation 23
4(1)(g)	Date on which observations and advice will be sought (check in advance of Gateway 2 by appointed Planning Inspector(s))	Regulation 26
4(1)(h) and (i)	Dates for proposed Local Plan consultation (pre-submission draft version)	Regulation 27
4(1)(j)	Date on which observations and advice will be sought (check in advance of Gateway 3 by appointed Planning Inspector(s))	Regulation 31
4(1)(k)	Date on which the Local Planning authority will submit their proposed Local Plan to the Secretary of State	Regulation 34
4(1)(l)	Proposed date of adoption	Regulation 39



**Appendix 3: Minister of State for Housing and
Planning letter to Three Rivers District Council
about their Local Plan, 18 March 2026**



**Ministry of Housing,
Communities &
Local Government**

Matthew Pennycook MP

Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Cllr Stephen Giles-Medhurst OBE
Leader, Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
WD3 1RL

18 March 2026

Dear Cllr Giles-Medhurst

Thank you for providing me with the full body of evidence that underpins the Three Rivers draft plan. Having considered it carefully, I am writing to inform you that the Secretary of State is now directing the Three Rivers District Council ('the Council') in respect to its emerging local plan ('the plan').

In my letter to you of 14 November 2025, I made clear that I expect Three Rivers to bring forward a plan that meets identified need as far as possible; that reflects national policy, including in relation to Green Belt release; and that is capable of being found sound at examination.

In my subsequent letter of 5 February 2026, I reiterated my concern that your emerging plan was not satisfactory and my lack of confidence that it was capable of being found sound or legally compliant at examination. In that same letter, I notified you that as a result of my reservations, I was exercising my powers under section 21A of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act'), to direct the Council not to take any step in connection with the adoption of the Plan, while I considered whether to give directions under section 21 and section 27 of the 2004 Act.

Having reviewed the draft plan alongside the additional evidence you provided, it is my considered opinion that the Regulation 19 draft plan approved for consultation at the Full Council vote on 27 January has not engaged sufficiently with the concerns I have conveyed to you.

As you will know, Section 21 of the 2004 Act provides the Secretary of State with intervention powers where they think that a local plan is unsatisfactory. Section 27 of that same Act provides the Secretary of State with broad default intervention powers where they believe a local planning authority is failing or omitting to do anything that it is necessary for them to do in connection with the preparation, revision or adoption of its Local Plan.

Local planning authorities are required to publish and maintain a Local Development Scheme (LDS), as set out in section 15(1) of the 2004 Act. Section 15(4) of the 2004 Act provides that the Secretary of State may direct changes to a local development scheme where they consider that



amendments are necessary to ensure that the authority's development plan documents fully and effectively cover the whole area.

It is my firm view that the available evidence demonstrates that the Council's Regulation 19 draft plan fails to propose allocating all appropriate housing sites available that could contribute towards meeting housing need. The Council are therefore proposing a plan which is highly likely to be found unsound at examination. On this basis, it is clear that the plan is unsatisfactory and that the Council is failing to do something necessary in respect of preparing the local plan. This meets the statutory test for intervention under section 21 and 27 of the 2004 Act

I have also considered the criteria laid out in the Planning Practice Guidance (PPG), which states that intervention under S27 of the 2004 Act "*should have regard to plan progress and local development needs*":

- **Plan Progress:** The current Three Rivers Local Plan, adopted in October 2011, is now almost 15 years old. It therefore stands as one of the oldest in the country and the policies it contains are likely to be significantly out of date. Progressing an unsatisfactory plan risks failure at examination and long delays until an up-to-date adopted plan is in place, with work having to restart in the new planning system. This would continue to leave the Council vulnerable to piecemeal and speculative development, with reduced public engagement and fewer guarantees that it will make the most of the area's potential.
- **Development needs:** The Council has consistently delivered below the target set by the standard method. The latest Housing Delivery Test (HDT) 2023 is the 5th lowest in the Country with a score of 30%, putting the LPA in the presumption in favour of sustainable development. This is unlikely to change without the adoption of an up-to-date Local Plan. The Council area is also one of the least affordable in the country, with an affordability ratio of 12.3 - meaning the median house price is 12.3 times the median annual earnings - compared with the England average of 7.7. There continues to be a significant need for additional social and affordable housing delivery in the area, which is unlikely to be met whilst the Council does not have an up to date local plan.

Taking all of the above into account, I consider that the intervention criteria are met, and that intervention is justified.

Pursuant to the powers in section 21 (1)(a) of the 2004 Act I am directing the Council to:

1. **Per Section 21(1)(a): make modifications to your proposed Regulation 19 plan to include, as a minimum, the sites set out below lifting the requirement to approximately 85% of need:**

- CFS26a Kings Langley Estate south
- CFS21 Land at Rousebarn Lane
- PCS4 East Green Street
- PCS47 South of Little Oxhey Lane
- NCFS12 Land East of Oxhey Lane
- NCFS6 Land to East of Watford Road
- Additionally, OSPF22 Batchworth Golf Course should lease issues be resolved



- 2. Per Section 21(1)(a): review and update the draft plan and evidence base in readiness for Regulation 19 consultation and Submission including where necessary in order to account for the additional sites.**

I previously gave a direction to the Council under section 21A of the 2004 Act, whilst I considered whether to make a direction under section 21 of the 2004 Act. The above direction under section 21(1)(a) supersedes the previous direction given under section 21A.

In addition, per section 27 of the 2004 Act I am directing the Council as follows:

- 3. Per Section 27(2)(b): Commence a revised Regulation 19 consultation by 31 July 2026 for a minimum period of 6 weeks;**
- 4. Per Section 27(3)(b): Submit your plan by 30 November 2026 with any proposed minor modifications necessary agreed by the Head of Planning Policy and the Director of Finance in consultation with the Lead Member on the Local Plan. Should proposed modifications be more significant this should be set out to the Secretary of State, allowing him to consider whether further action is necessary;**
- 5. Per section 27(2)(b): Not to take any step to withdraw the plan and report monthly (from the date of this letter) to my officials on the progress of the plan;**
- 6. Per Section 27(2)(b): Progress the plan up to the end of the examination process;**
- 7. Per Section 27(4)(b): On conclusion of the examination, to publish the Planning Inspector's recommendations and reasons; and**
- 8. Per Section 27(5)(b): On conclusion of the examination, to consider adopting the plan, including any main modifications recommended by the Planning Inspector deemed necessary to make the plan sound.**

Pursuant to section 27(8) of the 2004 Act, the Secretary of State has issued directions under section 27(2) and section 27(5) in order to ensure that, following the modifications required by direction under section 21(1)(a), the plan is afforded the best possible opportunity to undergo independent examination. The intention is to enable the Inspector to determine whether the modified plan is legally compliant and sound.

Finally, to avoid delays to plan making and ensure the plan is submitted for examination before the December 2026 deadline, per section 15(4) of the 2004 Act, I am also directing the Council to:

- 9. Per section 15(4) of the 2004 Act: Publish on your website a revised Local Development Scheme by 30 June 2026 to reflect directions set out above. For avoidance of doubt this should include the following milestones:**
 - Regulation 19 consultation to commence by no later than 31 July 2026
 - Submission of the plan for examination should be no later than 30 November 2026



The above directions will remain in force until withdrawn by the Secretary of State. Should you fail to comply with the directions in this letter, I will consider taking further action.

Notwithstanding this direction and the evidence you have already provided, I would like to give you an opportunity to set out by 25 March 2026 any exceptional circumstances which in your view suggest that intervention is not appropriate in this case. To be clear, this neither alters nor removes the direction set out in this letter.

I want to reiterate that I am committed to working constructively with you to ensure that Three Rivers can deliver the high-quality homes and essential infrastructure needed to underpin ambitious and sustainable growth. My officials will maintain ongoing engagement with your officers and will be in touch shortly to discuss next steps.

Yours sincerely,

MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



Appendix 4: Scheme of Delegation (December 2025) – relevant sections/ paragraph references for Local Plan preparation

SoD para ref	Functions (description)	Delegation	Analysis
Portfolio Holder: Leader			
1.11	Developing and managing external strategic relationships	Chief Executive (CE) and Chief Officers (COs)	<p>The Local Plan has implications for external stakeholders, both within and beyond the Borough boundaries (e.g. adjacent local authorities).</p> <p>Government guidance requires the preparation of Statements of Common Ground, to demonstrate cooperation and collaboration with key stakeholders. These matters should be regarded as operational.</p>
1.12	Shared services, Partnerships and Joint Working arrangements	CE and COs	<p>The Borough Council is already an active participant in many long-established partnerships, with relevance for plan-making.; e.g. Norfolk Strategic Planning Forum.</p> <p>Day to day responsibilities can continue under existing delegated powers, as day-to-day/ operational matters.</p>
1.14	Policy development and submission to Council	CE/ Monitoring Officer/ COs/ Chief Finance Officer	<p>The Local Plan forms a significant policy statement for the Council, which will remain in force for a significant period (typically 5-10 years). This requires regular professional input and expertise by relevant officers.</p> <p>The CO, supported by the Planning Policy team, will continue to provide the necessary professional advice and expertise, although the Council will ultimately need to approve and adopt the policy framework (as set by the Local Plan).</p>
Portfolio Holder: Planning and Licensing			
3.1	Development of Local Plan, planning performance and Land Use Policies	CO	<p>Para 3.1 provides the main day-to-day delegated power through which the Local Plan will be prepared. In practice, this requires active engagement</p>



SoD para ref	Functions (description)	Delegation	Analysis
			<p>with the relevant portfolio holder(s).</p> <p>Specific power is given to the CO to agree consequential amendments to planning policy; i.e. incorporating changes to the Local Plan, as this progresses (e.g. changes to national policy/guidance).</p>
Portfolio Holder: Climate Change and Biodiversity			
5 (5.1-5.6)	Climate change and Biodiversity	CE and COs	<p>The draft NPPF sets out a suite of themes and topics that the Local Plan will need to cover. The NPPF requires the Local Plan to consider policies regarding climate change, renewable energy, biodiversity, local character/ landscape and transport.</p> <p>These matters are all delegated to the CE and COs, so these can be managed and implemented on a day-to-day basis through delegated powers. However, the Council will ultimately need to approve and adopt the policy framework (as set by the Local Plan)</p>
Portfolio Holder: Environment and Coastal			
6.2	Coastal Issues, Shoreline Management and flood and water management including water quality/ usage	CE and COs	<p>The Coastal Change Management Area (Wolferton Creek – Hunstanton) has long been a matter covered by the Local Plan (currently policies LP15 and LP17). The Local Plan also includes policies for water efficiency and flood risk management (LP18 and LP25 respectively).</p> <p>The new Local Plan will similarly consider such issues, so policies could continue to be managed and implemented through delegated powers. However, the Council will ultimately need to approve and adopt the policy framework (as set by the Local Plan)</p>
Powers delegated to Cabinet			



SoD para ref	Functions (description)	Delegation	Analysis
11 (11.1-11.7)	Cabinet		<p>SoD section 11 sets out the specific role/ function of Cabinet. This includes making recommendations to the Council for Local Plan policies.</p> <p>Cabinet also operates where functions, actions or powers are not explicitly delegated to officers.</p>



Appendix 5: Decision-Making Structures – Levels at which individual decisions can be taken

To provide clarification about how delegated powers may be applied in practice to preparation of the Local Plan, the matrix below shows how delegated powers should be applied to the Local Plan process. This provides the additional clarification needed, to ensure the statutory deadlines can be achieved.

[NOTE: colours are for illustration, not to indicate risk scoring]

Category	Examples of where Local Plan decisions should be taken
<p>Cabinet and/ or Council decision</p>	<p>Applying the SoD, Cabinet and/ or Council decisions should be reserved for major decisions; e.g. authorising publication of draft development plan documents (in this case, the Local Plan).</p> <p>Key milestones, such as statutory consultation stages, including:</p> <ul style="list-style-type: none"> • Scoping consultation (Regulation 20); and • proposed Local Plan (pre-submission draft version) consultation (Regulation 27).
<p>Member Delegated decision; or LPTG recommendation (in lieu of Member Delegated decision)</p>	<p>The LPTG was set up specifically as a forum to make recommendations to Cabinet and/ or the portfolio holder regarding the Local Plan. Typically, such decisions may take the forms of topic papers or statements of preferred options/ approaches; e.g. recommendations regarding the settlement hierarchy, individual site-specific allocations/ designations, or non-designated heritage assets (locally listed buildings).</p> <p>In most cases, a LPTG meeting would be convened and any recommendations or proposals put forward would be minuted, as if these were Member Delegated decisions taken by the portfolio holder. There may, however, be occasions where a Member Delegated decision may be separately needed.</p>
<p>Officer Delegated decision</p>	<p>As demonstrated, powers delegated to the Chief Executive and/ or Chief Officers (Assistant Directors) are extensive. These predominantly relate to day-to-day operational decisions.</p> <p>Officers have been required to undertake extensive procurement for the preparation of evidence base documents to support the Local Plan, including the housing needs assessment, strategic flood risk assessment and landscape character assessment. These are typically below £100,000 in value; i.e. within the Chief Officer's powers of approval. Any studies exceeding £100,000 (up to £250,000) would require approval of the portfolio holder (as a Member Delegated decision).</p>



Appendix 6: Local Plan Timetable: Key milestones and proposed level of decision

2026 Reg No	Description	Date(s)	Proposed decision type/ role of LPTG	Commentary/ explanation (NB – all key milestones will be preceded by LPTG)
19	Notice of intention to commence Local Plan preparation	May/ June 2026	Operational (Chief Officer) decision: LPTG informed of Nol and Local Plan Timetable (LPT) publication, supported by relevant publicity (press release, consultation emails etc)	<p>The Nol represents the formal launch date for the Local Plan. Previously, this required a Cabinet recommendation, followed by confirmation from the full Council.</p> <p>The Government has already written to the Council (Appendix 1), thereby setting plan preparation deadlines (Nol: 30 June 2026). In turn, this defines the LPT. The legislation (2023 LURA and Regulation 19) mandates preparation of a Local Plan and the contents of the Nol, meaning this initial plan-making stage is wholly operational.</p>
20	Scoping consultation	July – Sept 2026	<p>Cabinet decision: consultation materials presented to LPTG for consideration (in its quasi-panel role), followed by Cabinet sign-off.</p> <p>Cabinet to agree specific delegated powers for officers to review consultation feedback and proceed through Gateway 1 (Regulations 21 and 22). Explicit powers should be agreed by Cabinet to delegate day-to-day matters for plan-making to the Portfolio Holder and senior officers (as appropriate), advised by the LPTG.</p>	<p>The Scoping consultation requires the production of a range of policy documents, for consultation (preliminary stage of plan-making). Therefore, Cabinet approval would be necessary to approve specific Scoping consultation documents (e.g. Scoping/ issues and options questions; sites put forward through February – March 2026 Call for Sites; growth options etc).</p> <p>The Constitution (Part 3: Terms of Reference) specifies functions reserved for the full Council, including adopting policies (G.3). Otherwise, Part 3 specifies Cabinet's role, including whether to delegate specific powers to the relevant Portfolio Holder and/ or senior officers (B.3 and B.4). Accordingly, Cabinet should approve consultation materials and specific delegation of powers to the Chief Officer to approve the self-assessment and Gateway 1 passage (Regulation 21), an operational matter.</p>
21 and 22	Self-assessment summary and Gateway 1	October 2026	Operational (Chief Officer) decision: Scoping (Regulation 20) consultation feedback and other supporting documentation will be	Gateway 1 represents the formal start of the plan-making process, when the statutory 30-month timetable commences. It is preceded by a self-assessment; a check to ensure all the legal



2026 Reg No	Description	Date(s)	Proposed decision type/ role of LPTG	Commentary/ explanation (NB – all key milestones will be preceded by LPTG)
			presented to LPTG for information, with specific powers to complete the self-assessment and proceed through Gateway 1 (Regulations 21 and 22), having been already agreed by Cabinet.	<p>obligations have been met, in advance of starting the formal plan-making process.</p> <p>The self- assessment is a professional/ technical part of the plan-making process. This is an administrative matter, considering whether the necessary legal requirements have been met and implications for policymaking.</p> <p>Accordingly, this is an operational matter, although the Portfolio Holder and Local Plan Task Group should be kept informed.</p>
23	Notice of plan content and evidence consultation (assembly of evidence base)	Nov 2026 – Feb 2027	<p>Operational (Chief Officer) decision: following Gateway 1, officers will collate the evidence base (studies and background papers) and prepare Regulation 23 consultation material.</p> <p>This will be presented to the LPTG for information, in advance of the Regulation 23 consultation.</p>	<p>Formal preparation of material for the plan content and evidence consultation will commence immediately, as soon as Gateway 1 (Regulation 21) is passed. The evidence base will consist of studies prepared by external consultants, together with in-house (officer) prepared studies and background papers.</p> <p>It is anticipated that draft policies/ preferred options will be pulled together and presented to LPTG, for Member consideration and to inform the Portfolio Holder.</p>
23	Notice of plan content and evidence consultation (initial draft Local Plan preferred options/ policy approach consultation)	March – April 2027	<p>Member delegated decision: materials for Regulation 23 consultation will be presented to LPTG, for Member consideration.</p> <p>The LPTG will advise the Portfolio Holder, allowing approval of consultation documentation as a Member Delegated decision.</p>	<p>Materials for the notice of plan content and evidence consultation (consultation and supporting evidence base documents) will need to be considered by the LPTG. Consultation material will include a draft vision (with measurable outcomes) and initial proposed strategy/ direction (without necessarily detailed draft policies).</p> <p>This (first post-Gateway 1) stage in the process involves initial policy development and the publication of consultation materials and supporting documentation. However, through specific delegated powers it is proposed should accompany the Scoping consultation (anticipated July</p>



2026 Reg No	Description	Date(s)	Proposed decision type/ role of LPTG	Commentary/ explanation (NB – all key milestones will be preceded by LPTG)
				<p>2026 Cabinet decision) the decision for the Regulation 23 consultation could be taken by the Portfolio Holder (advised by the LPTG).</p> <p>Political activity and publicity around the consultation may be restricted by pre-election (formerly known as purdah) rules (after 25 March 2027). Although the required Cabinet decision should pre-date the pre-election restrictions, it will be necessary to be mindful of the implications for running the Regulation 23 consultation itself.</p>
24 and 25	Publication of summary of consultation on proposed local plan content and evidence	June – July 2027	Operational (Chief Officer) decision: following the Regulation 23 consultation, feedback will be collated by officers and presented to the LPTG, for information.	<p>The Regulation 23 consultation represents the first public iteration of “direction of travel” for the new Local Plan.</p> <p>Feedback from the Regulation 23 consultation will inform drafting of detailed Local Plan policies. Feedback will be presented to the LPTG for information. The draft Policies Map will also need to be developed, which will show potential locations for growth and/or site allocations.</p>
24 and 26	Preparation for Gateway 2: Appointment of Planning Inspector to review emerging Local Plan and supporting evidence base	July – October 2027	Operational (Chief Officer) decision: Regulation 23 consultation feedback collated by officers and presented to LPTG, for information	<p>Regulation 23 consultation feedback and available evidence base will be considered in drafting detailed policy text and supporting background/ topic papers. Background/ topic papers provide a bridge between the evidence base and emerging policies.</p> <p>Emerging draft Local Plan policies/ preferred options and evidence base/ background papers (supporting documents) will be submitted to Secretary of State/ appointed Planning Inspector(s). The appointed Inspector(s) will advise on whether the emerging Local Plan and supporting evidence base are sufficiently robust to fulfil requirements of Regulation 24 and allow progress to Regulation 26 (Gateway 2).</p>



2026 Reg No	Description	Date(s)	Proposed decision type/ role of LPTG	Commentary/ explanation (NB – all key milestones will be preceded by LPTG)
26	Gateway 2: observations and advice from an appointed person	Nov – Dec 2027	Operational (Chief Officer) decision: LPTG will be informed of feedback from the appointed person (Planning Inspector), and advice as to whether or not the emerging Local Plan is sufficiently robust to pass Gateway 2.	<p>The Gateway 2 assessment is an independent professional/ technical part of the plan-making process, undertaken by an appointed Inspector. This is the initial independent/external analysis of the emerging Local Plan. The appointee would give initial consideration as to whether the emerging Plan is “sound”; i.e. meets the necessary legal and procedural tests.</p> <p>Following on from the development/ refinement of the Local Plan through the Regulation 24 process, officers need to collate documents for the appointed person (Planning Inspector) to assess. The process will require Chief Officer (Executive Director) approval, prior to submission of documents to the appointed Planning Inspector(s).</p>
27	Consultation on the proposed local plan	March – April 2028	<p>Cabinet decision: draft (proposed) Local Plan (pre-submission draft) will be developed by officers and presented to Cabinet for approval to go to consultation under Regulation 27.</p> <p>Cabinet will need to agree explicit powers to delegate matters relating to the Local Plan examination (following submission to the Secretary of State) to senior officers (as appropriate). The LPTG would oversee preparation of the proposed Local Plan.</p>	<p>The proposed Local Plan forms the formal draft version of the Plan that the Council wishes to submit to the Secretary of State.</p> <p>The proposed Local Plan consultation document and supporting evidence base will need to be considered by the LPTG. The focus for the Regulation 27 consultation will be the tests of soundness (i.e. to inform the Plan examination).</p> <p>Given that this stage in the process represents a significant policy development stage, then Cabinet approval will be necessary. It will be necessary to secure explicit delegation to senior officers, to allow the Local Plan to progress through Gateway 3, and onto examination (following the Regulation 27 consultation).</p> <p>It is anticipated that local government reorganization (LGR) will come into effect on 1 April</p>



2026 Reg No	Description	Date(s)	Proposed decision type/ role of LPTG	Commentary/ explanation (NB – all key milestones will be preceded by LPTG)
				<p>2028, so the Regulation 27 consultation would likely overlap the formation of the new Council. The consultation would therefore be a legacy project for the Borough Council, which would then need to be taken forward by the new West Norfolk unitary authority.</p>
30	Publication of summary of consultation on the proposed local plan	June – August 2028	<p>Member delegated decision: feedback from Regulation 27 consultation will be presented to LPTG, for Member consideration.</p> <p>The LPTG will advise the Portfolio Holder, allowing approval of any changes to the proposed Local Plan and progress to Gateway 3 as a Member Delegated decision.</p>	<p>Feedback from Regulation 27 consultation (regarding the tests of soundness) will be collated, and potential changes to the pre-submission draft Local Plan and Policies Map duly considered (with reference to Regulation 27 feedback and the evidence base).</p> <p>Feedback will be presented to the LPTG for consideration, with draft policy changes presented to the Portfolio Holder for approval.</p>
31-33	Gateway 3: prescribed requirements assessment by an appointed person	Sept – October 2028	<p>Operational (Chief Officer) decision: LPTG will be informed of feedback from the appointed person (Planning Inspector), and advice as to whether or not the emerging Local Plan is sufficiently robust to pass Gateway 3.</p>	<p>Gateway 3 represents the final stage in the plan-making process. Whether or not the Local Plan can proceed to examination is dependent upon preliminary assessment by the appointed Planning Inspector(s), under Regulations 31 and 32.</p> <p>Following on from the Regulation 27 consultation, officers need to collate and assemble a library of documents for the appointed person (Planning Inspector) to assess. The process will require Chief Officer (Executive Director) approval, prior to submission to the appointed Planning Inspector(s). The Inspector(s) may require further work to be undertaken, prior to passage of Gateway 3, so this may entail a repeat process.</p> <p>The Gateway 3 assessment is the final stage in the process that is led by the local authority. It is an independent professional/ technical part of the plan-making process. The Portfolio Holder</p>



2026 Reg No	Description	Date(s)	Proposed decision type/ role of LPTG	Commentary/ explanation (NB – all key milestones will be preceded by LPTG)
				and Local Plan Task Group will be kept informed.
35	Independent examination: local plans	Nov 2028 – April 2029	Operational (Chief Officer) decision(s): LPTG will be regularly informed about progress of the Local Plan during the independent examination. LPTG will be kept informed regarding the proposed Main Modifications (preparation for consultation), although these are directed by the Planning Inspector(s).	<p>From submission (Gateway 3), the Local Plan process (independent examination) is led by the appointed Inspector(s). However, following the written and hearings stages of the examination, there will be a need for a final (Main Modifications) consultation.</p> <p>The Main Modifications are directed by the Inspector(s); therefore, proposed Main Modifications are an operational matter, forming part of the ongoing examination. Feedback from the Main Modifications consultation will be collated and presented to the Inspector(s).</p>
37	Publication of the recommendations and reasons of the examiner: local plans	May 2029	Operational (Chief Officer) decision: LPTG will be informed of receipt and publication of Inspector's Report	Publication of the Inspectors' Report is a solely operational matter. This requires publication on the website and notification of interested parties in accordance with the project plan.
39	Adoption of local plan	June – July 2029	Cabinet and Council decision: adoption of Local Plan as part of the Council's policy framework (Constitution Terms of Reference, para G.3). LPTG would be advised of proposed adoption, in advance of Cabinet and full Council.	<p>Adoption of the Local Plan process requires Council approval, as this represents adoption of an entirely new suite of policies.</p> <p>It is expected that the Local Plan would be adopted by the West Norfolk unitary authority, as a legacy Borough of King's Lynn and West Norfolk area development plan document.</p>



REPORT TO CABINET

DATE OF MEETING	9 th June 2026
REPORT TITLE	2026/2027 Appointment of Members to serve on Cabinet Committees and establishment of Community Project Fund and Budget Setting Cabinet Task Group
LEAD MEMBER	Leader, Councillor Alistair Beales
LEAD OFFICER	Rebecca Parker, Democratic Services Manager
CONSULTEES	Executive Leadership Team
WARDS AFFECTED	N/A

KEY DECISION	YES/NO
DECISION MAKER	Cabinet Recommendations to Council Part Cabinet Decision and Part Recommendations to Council Other Council Body
IS THE REPORT OPEN OR EXEMPT	OPEN/EXEMPT

FINANCIAL IMPLICATIONS	YES/NO
HR IMPLICATIONS	YES/NO
POLICY IMPLICATIONS	YES/NO
STATUTORY IMPLICATIONS	YES/NO
RISK MANAGEMENT IMPLICATIONS	YES/NO
ENVIRONMENTAL IMPLICATIONS	YES/NO
EQUALITY IMPACT ASSESSMENT COMPLETED	Pre-screen has been completed.

SUMMARY OF REPORT

This report invites Cabinet to consider establishing a Community Project Fund and Budget Setting Task Group and also invites the Cabinet to agree to arrange for the appointment of members to serve on the following bodies:

- CIL Spending Panel
- Members Major Projects Board
- Local Plan Task Group
- Shareholder Committee
- King's Lynn Area Committee,

Proportional make up of Task Groups were agreed at Annual Council as follows:

11 Member Task Group – 4 Independent Partnership, 3 Conservative, 1 Labour, 1 Reform, 1 Progressive Group and 1 West Norfolk Independent Group

9 Member Task Group – 3 Independent Partnership, 3 Conservative, 1 Labour, 1 Reform and 1 Progressive Group or 1 West Norfolk Independent Group

7 Member Task Group – 3 Independent Partnership, 2 Conservative, 1 Labour and 1 Reform



5 Member Task Group – 2 Independent Partnership, 2 Conservative and 1 Labour

RECOMMENDATIONS

Cabinet resolves to:

- 1) Instruct Officers to seek membership from Group Leaders for the Cabinet Committees and Task Groups for 2026/27 as set out in part 3 of the report.
- 2) In accordance with Standing Order 29.4, if any of the Task Groups are not appointed having regard to Political Balance that the Leaders of each Political Group be asked to agree that this rule be disapplied.
- 3) Establish a 7 Member Task Group named the Community Project Fund and Budget Setting Task Group and agree the Terms of Reference as attached at Appendix 1 and instruct officers to seek membership from Group Leaders for the Task Group with the Chair and Vice Chair to be appointed by the Leader.

REASON FOR DECISION

To allow the business of the Council to continue into 2026/27.

CORPORATE STRATEGY

How does this proposal support our Corporate Priorities [Our priorities | Corporate Strategy 2023 - 2027 | Borough Council of King's Lynn & West Norfolk](#)

<p>Promote growth and prosperity to benefit West Norfolk</p>	<p>Appointing Members to serve on Cabinet Committees directly supports the council's corporate priorities by ensuring that each committee has the appropriate political representation, skills and leadership needed to oversee key areas of work. Effective and properly constituted committees help drive growth and prosperity by providing clear governance for major projects, infrastructure planning and investment decisions.</p>
<p>Protect our Environment</p>	<p>The appointment to these task groups will contribute to protecting our environment by ensuring that environmental considerations, planning policies and sustainability objectives are embedded in decision-making.</p>
<p>Efficient and effective delivery of our services</p>	<p>Strong committee membership also underpins the efficient and effective delivery of services, as well-governed panels and boards enable timely, informed and accountable decisions.</p>



<p>Support our communities</p>	<p>Finally, these appointments support our communities by ensuring that local voices, democratic representation and community priorities are reflected in the work of committees that shape services, local planning and resource allocation across West Norfolk.</p>
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REPORT DETAIL

1. Introduction

1.1 This Annual Report sets out the arrangements required for the 2026/27 municipal year in relation to key member bodies that support the Council’s governance, oversight, and decision-making processes. It invites the Cabinet to consider and agree the appointment of members to serve on its Task Groups and Sub Committees; the Community Infrastructure Levy (CIL) Spending Panel, the Members Major Projects Board, the Local Plan Task Group, the Shareholder Committee, and the King’s Lynn Area Committee.

1.2 The report also seeks Cabinet approval to establish the Community Project Fund and Budget Setting Task Group. This Task Group will comprise of 7 Members, will be proportional and the Chair and Vice Chair will be appointed by the Leader.

2. Background

For information the 2025/2026 Membership of existing bodies is shown in brackets below.

2.1 CIL Spending Panel

Established in 2020, the membership should be as follows: 5 Members - 2 Con (R Blunt and S Sandell), 2 Ind (M de Whalley and J Moriarty) and 1 Lab (F Bone)– Chaired by Planning and Licensing Portfolio Holder.

2.2 Member Major Projects Board

The membership of the Members Major Projects Board is 7 members – 4 Cabinet members, specified in the Board’s Terms of Reference as the Leader, Deputy Leader, Portfolio Holder for Planning & Licensing and Portfolio Holder for Finance and 3 representatives from other groups (2 Con (R Blunt, B Long), 1 Lab (D Heneghan)). Chaired by the Leader and Vice – Chair the Deputy Leader.

2.3 Local Plan Task Group

The membership of the Local Plan Task Group (9 Members - 4 Ind (M de Whalley, J Moriarty, T Parish, S Lintern), 3 Con (R Blunt, S Sandell, V



Spikings), 1 Lab (S Everett) and 1 Reform (Fry)). Chaired by the Planning & Licensing Portfolio Holder.

2.4 Shareholder Committee

This is a Cabinet Sub-Committee and Cabinet are invited to appoint 3 Cabinet Members not serving on any Council Company. The Committee elects its own Chair and Vice- Chair. The current membership is The Leader, Deputy Leader and the Finance Portfolio Holder.

2.5 King's Lynn Area Committee

The Area Committee was set up on 5 March 2024 and comprises the 14 councillors representing the unparished area of King's Lynn. The Committee elects its own Chair and Vice-Chair.

3. Proposal

- 3.1** Cabinet are requested to consider the make up of the following bodies and appoint Members to the following groups, taking into consideration revised political make up of Task Groups as agreed at Annual Council in May 2026, where required.

3.1.1 CIL Spending Panel

5 Members - 2 Independent Partnership, 2 Conservative and 1 Labour

3.1.2 Member Major Projects Board

7 members – 4 Cabinet Members (Leader, Deputy Leader, Portfolio Holder for Planning & Licensing and Portfolio Holder for Finance and 3 representatives from other groups)

3.1.3 Local Plan Task Group

9 Member Task Group – 3 Independent Partnership, 3 Conservative, 1 Labour, 1 Reform and *1 Progressive Group or West Norfolk Independent Group*

3.1.4 Shareholder Committee

3 Cabinet Members not serving on any Council Company - The Leader, Deputy Leader and the Finance Portfolio Holder.

3.1.5 King's Lynn Area Committee

14 Councillors representing the unparished area of King's Lynn.



3.1.6 Community Project Fund and Budget Setting Task Group

Following the recent budget setting for 2026/27 Council agreed to allocate £500k for community projects which Members can submit applications for against an agreed criteria. This Task Group is being set up to enable cross-member review of all applications and make recommendations for allocation of funds. In addition following the recent budget setting process Members have requested that they be more involved in the process leading up the February budget setting meeting. This Task Group will also cover these aspects. Appendix 1 to this report contains the terms of reference for the task group.

7 Member Task Group - 3 Independent Partnership, 2 Conservative, 1 Labour and 1 Reform

4. Financial Implications

There are no financial implications.

5. HR Implications

There are no implications to HR.

6. Policy Implications

There are no policy implications to consider.

7. Climate Change and Environmental Implications and considerations

There are no climate change and environmental implications or considerations.

8. Statutory and Legal Implications

None.

9. Local Government Reorganisation Implications

There are no direct implications arising from Local Government Reorganisation (LGR) in relation to the appointment of Members to serve on Cabinet Committees. However, any future structural changes such as alterations to political proportionality, committee structures, or executive decision-making frameworks may require a further review of Cabinet Committee memberships to ensure continued compliance with statutory requirements and alignment with any new governance models. At this stage, the appointments proposed in this report reflect the council's current constitutional arrangements and political group composition.

10. Health and Safety Implications

There are no health and safety implications for Members of Cabinet to consider.



11. Consultees

Alongside the Executive Leadership Team (Chief Executive, Deputy Chief Executive, Section 151 Officer, Monitoring Officer, Chief of Staff and Chief Operating Officer), the consultees also include the Leader and Deputy Leader of the Council, as well as the Leader and Deputy Leader of the opposition parties.

12. Equality Impact Assessment

Pre Screening EIA attached.

13. Risk Management Implications

There are none.

14. Conclusion

In conclusion, Cabinet is required to agree the appointment of Members to serve on the Cabinet Committees as set out in the report. These appointments ensure that each body is properly constituted for the forthcoming municipal year and reflect recent changes in political group membership and leadership.

LIST OF APPENDICES

Appendix 1 – Terms of Reference for Cabinet Task Group

LIST OF BACKGROUND PAPERS

[Council's Constitution](#)
[Terms of Reference](#)
[Previous Reports to Cabinet](#)
[Agenda and Minutes from Meetings](#)

PRE SCREENING EQUALITY IMPACT ASSESSMENT

For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	2026/2027 Appointment of Members to serve on Cabinet Committees			
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Is this a new or existing policy/service/function? (tick as appropriate)	New		Existing	x
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<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>2026/2027 Appointment of Members to serve on Cabinet Committees</p>				
<p>Who has been consulted as part of the development of the policy/service/function? – new only (<i>identify stakeholders consulted with</i>)</p>	<p>Cabinet</p>				
<p>Question</p>	<p>Answer</p>				
<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. NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p> <p><i>*For more information on health inequalities please visit The King's Fund</i></p>		<p>Positive</p>	<p>Negative</p>	<p>Neutral</p>	<p>Unsure</p>
	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	
	Armed forces community			X	
	Care leavers			X	
	Health inequalities*			X	
	Other (eg low income, caring responsibilities)			X	
<p>Please provide a brief explanation of the answers above:</p> <p>The purpose of this report is to appoint Members to various Cabinet Sub-Committees and Task Groups. Any proposals put forward by the Group would be subject to separate reports which would have their own EIA pre-screen completed.</p>					
<p>Question</p>	<p>Answer</p>	<p>Comments</p>			
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage</p>	<p>Yes-/ No</p>				



relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?		
3. Could this policy/service be perceived as impacting on communities differently?	Yes / No	
If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:		
Decision agreed by EWG member:		
4. 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	Actions:
		Actions agreed by EWG member:
5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes-/ No	Please provide brief summary:
Assessment completed by:	Rebecca Parker	
Name		
Job title	Democratic Services Manager	
Date completed	23rd April 2026	
Reviewed by EWG member	Jo Stanton	Date 29 April 2026
✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)		

Cabinet Task Group

Community Project Fund and Budget Setting

Terms of Reference

Community Project Fund

The Community Project Fund is designed to support councillors in delivering community led projects that improve local facilities, enhance wellbeing and strengthen community resilience across the Borough. Projects should demonstrate a clear and measurable community benefit.

The Cabinet Task Group will:

- Receive applications from Borough Councillors on behalf of eligible applicants.
- Assess the applications against the agreed criteria.
- Make recommendations to Cabinet in relation to the awarding of grants from the Community Project Fund.

Budget Setting

The Cabinet Task Group will:

- Support Cabinet in an advisory role as part of the budget setting process by reviewing proposals providing comments to inform Cabinet's consideration ahead of the statutory budget decisions.
- Consider proposals alongside the Medium Term Financial Strategy with particular regard to affordability, deliverability and risk and alignment with the councils priorities.
- Provide advice on emerging budget options, potential impacts and opportunities recognising the need to maintain a balanced budget and sustainable financial position.
- Contribute to the budget setting timetable by supporting the development and review of proposals.

Task Group Status

The Community Project Fund and Budget Setting Cabinet Task Group has been established by Cabinet and is effective from (DATE).

The remit of the task group is set out in these terms of reference. The task group is advisory with no delegated decision making powers.

Membership

The Cabinet Task Group will comprise of seven Councillors, to be politically balanced, as appointed by Group Leaders.

The Chairman and Vice Chairman of the Cabinet Task Group shall be appointed by the Leader of the Council.

Substitutes may attend and vote at the Cabinet Task Group, in accordance with the Council's standing orders.

The quorum is three voting members to transact any business.

Officers

The Cabinet Task Group will be supported by the relevant officers, who will provide reports for consideration but will not be voting members.

Such officers will provide advice on finance, legal and governance matters as required.

Procedures and protocol

The Chairman of the Cabinet Task Group shall be responsible for maintaining order and the effective conduct of business at meetings.

Any members of the Council may attend and speak at the meetings under standing order 34.

Members of the public can attend the meetings, and a representative from an organisation who has submitted an application may attend and present the application, with the lead Member.

Meetings will be scheduled in line with:

- The community project fund application rounds.
- The budget timetable including key milestones before Cabinet considers the draft budget.
- The Chair may call additional meeting if required to meet deadlines.

Voting

Voting shall be by a simple majority by show of hands.

Voting members may request that their votes are recorded.

In the event of an equality of votes the Chairman shall have a second or casting vote.



REPORT TO CABINET

DATE OF MEETING	9 th June 2026
REPORT TITLE	Sale of Vegas & South Shore Caravan Parks
LEAD MEMBER	Cllr Simon Ring, Cabinet Member for Business
LEAD OFFICER	David Gent, Interim Estates Surveyor
CONSULTEES	Carl Holland, Assistant Director Finance Cllr Dickinson and Cllr Pidcock, Ward Councillors for Hunstanton
WARDS AFFECTED	Hunstanton

KEY DECISION	Yes
DECISION MAKER	Cabinet
IS THE REPORT OPEN OR EXEMPT	OPEN (with EXEMPT Appendix A)

FINANCIAL IMPLICATIONS	Yes
HR IMPLICATIONS	No
POLICY IMPLICATIONS	Yes
STATUTORY IMPLICATIONS	Yes
RISK MANAGEMENT IMPLICATIONS	Yes
ENVIRONMENTAL IMPLICATIONS	No
EQUALITY IMPACT ASSESSMENT COMPLETED	Yes

SUMMARY OF REPORT

The Borough Council is the freehold owner of two caravan sites in Hunstanton known as South Shore Caravan Park and Vegas Caravan Park. Both sites are currently leased to a single operator.

Following a formal marketing exercise and subsequent negotiations, terms have provisionally been agreed for the disposal of the Council's freehold interest. Due diligence on the preferred purchaser has been completed satisfactorily and the transaction is progressing with both parties having instructed solicitors on the basis that each party bears their own costs.

The disposal of the sites supports the Council's wider Capital Strategy 2026-27 for the use of capital receipts from the disposal of assets to support the funding of the Capital Strategy.

This report seeks Cabinet approval to proceed with the disposal in accordance with the agreed terms as detailed in the exempt appendix.

RECOMMENDATIONS

Cabinet is recommended to:

1. Approve the disposal of the freehold interest in South Shore Caravan Park and Vegas Caravan Park, Hunstanton as set out in this report.



2. Delegate authority to the Assistant Director for Property, in consultation with the Cabinet Portfolio Holder for Business, to finalise the terms of the disposal, including any non-material amendments.

REASON FOR DECISION

To enable the Council to realise a capital receipt from the disposal of non-core assets and support the delivery of the Council's Capital Programme.

CORPORATE STRATEGY

How does this proposal support our Corporate Priorities [Our priorities | Corporate Strategy 2023 - 2027 | Borough Council of King's Lynn & West Norfolk](#)

Promote growth and prosperity to benefit West Norfolk	Yes. Selling to the current tenant will allow the purchaser to invest in the business long term and improve the facilities offered at both caravan parks. This will benefit the tourism economy for the Hunstanton area.
Protect our Environment	Not applicable
Efficient and effective delivery of our services	Not applicable
Support our communities	Not applicable

REPORT DETAIL

1. Introduction

- 1.1 Property Services identified both sites as suitable for disposal and progressed them to be brought forward for marketing.
- 1.2 Specialist advisors in caravan park assets were appointed to undertake the marketing process and advise on the disposal strategy. The properties were marketed openly including direct marketing to a wide pool of potential purchasers.
- 1.3 The marketing and proposed disposal of these sites has been undertaken in accordance with these provisions set out in the Council's Property Disposal Policy (March 2026), specifically:
 - Section 8 (Identification of Surplus Assets) - supports the progression of assets that are no longer delivering operational, financial or strategic value
 - Section 9 (Methods of Disposal) – sets out the requirement for open marketing and due diligence
 - Section 10 (Governance Arrangements and Oversight) – requires engagement with appropriate Members and stakeholders.



2. Background

2.1 Both sites are situated within the seaside resort town of Hunstanton on the north Norfolk coast:

- **South Shore Caravan Park** - a seafront site on the South Promenade and Hunstanton South Beach comprising 120 static caravan pitches and some 58 beach huts.
- **Vegas Caravan Park** - is set approximately 100 metres back from the South Promenade and Hunstanton South Beach comprising 73 static caravan pitches.

2.2 Both sites are currently leased to the same operator.

3. Proposal

3.1 The Council's freehold interest in both sites has been marketed for sale.

3.2 Following a marketing exercise, a preferred bidder has been identified and terms provisionally agreed. Due diligence has been satisfactorily completed and legal processes are underway.

3.3 Full details of the agreed terms, including financial considerations, are contained within the exempt appendix.

4. Options Considered

4.1 The following options have been considered:

Option 1 – Dispose of the assets (Recommended)

- Secures an immediate capital receipt.
- Supports the Council's wider [Capital Strategy 2026-27 Council](#) ref para 3.8 Capital Financing). The capital receipt from the disposal of these assets supports the objective of the Capital Strategy for funding the Capital Programme by capital receipts from the disposal of assets
- Transfers future investment and operational risk to the private sector.

Option 2 – Retain the assets

- Continues to generate rental income.
- Retains asset ownership and exposure to market and operational risks

4.2 The Borough Council has identified a number of sites (including the subject sites) that it wishes to dispose of to secure capital receipts for investment into other projects. The capital receipt generated by this proposed disposal is considered to represent best value through an excellent return on the investment as set out in the appendix.



4.3 Therefore, Option 1 is the recommended option.

5. Financial Implications

5.1 The sale of the sites will produce a capital receipt of the agreed price which will make a significant contribution to the delivery of the Council's Capital Programme.

5.2 Detailed financial information, including valuation considerations and income implications, is provided within the exempt appendix.

6. HR Implications

6.1 None

7. Policy Implications

7.1 The proposal is consistent with the Council's Property Disposal Policy and also supports delivery of the Council's Capital Programme under the Council's wider Capital Strategy 2026-27 for the use of capital receipts from the disposal of assets to support the funding of the Capital Programme.

8. Climate Change and Environmental Implications and considerations

8.1 None

9. Statutory and Legal Implications

9.1 The Council's actions in disposing of land are subject to statutory provisions under:

9.2 Section 123 of the Local Government Act 1972 to dispose of land using whatever method it chooses as long as it meets its overriding duty to obtain the best consideration that can be reasonably obtained for the land.

9.3 The terms agreed are considered to meet this requirement

10. Local Government Reorganisation Implications

10.1 None

11. Health and Safety Implications

11.1 None

12. Consultees



12.1 Ward Members for Hunstanton were consulted on the proposals. No comments were raised.

13. Equality Impact Assessment

13.1 A pre-screening Equality Impact Assessment has been completed, identifying no adverse impacts.

14. Risk Management Implications

14.1 Solicitors have been instructed on the basis that each party pay their own costs. Should the Cabinet not approve the sale, the Council will be responsible for its own abortive legal costs only.

15. Conclusion

15.1 The proposed disposal of the sites represents best value to the Borough Council and will make a significant contribution to the Council's Capital Programme. It also enables future investment in the sites by the operator.

LIST OF APPENDICES

Exempt Appendix A – Disposal terms and financial details.

LIST OF BACKGROUND PAPERS

Site plans showing the titles to be disposed of.

PRE SCREENING EQUALITY IMPACT ASSESSMENT

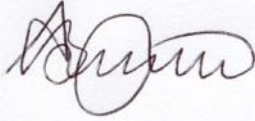
For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	Sale of land.		
Is this a new or existing policy/service/function? (<i>tick as appropriate</i>)	New		Existing
Brief summary/description of the main aims of the policy/service/function being screened.	Sale of land as detailed in the report.		
Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.			



Who has been consulted as part of the development of the policy/service/function? – new only <i>(identify stakeholders consulted with)</i>	N/A				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, 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. NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p> <p><i>*For more information on health inequalities please visit The King's Fund</i></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	
	Armed forces community			x	
	Care leavers			x	
	Health inequalities*			x	
	Other (eg low income, caring responsibilities)			x	
Please provide a brief explanation of the answers above:					
Question	Answer	Comments			
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	No				
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	No				
If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:					



Decision agreed by EWG member:			
4. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	No	Actions:	
		Actions agreed by EWG member:	
5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No	Please provide brief summary:	
Assessment completed by: Name	David Gent		
Job title	Disposal Surveyor		
Date completed	29 th April 2026		
Reviewed by EWG member 	Allison Bingham	Date	29th April 2026
✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)			

Document is Restricted