



Stage 2 – Full Equality Impact Assessment Form

Text below in red is for guidance when completing the form

Title of the Equality Impact Assessment report:

High Street Rental Auctions

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

- List the Executive Director and Service Manager, plus the person completing this assessment if different.
- What is the current position/service/policy?

Mark Whitmore - Health, Wellbeing & Public Protection

Duncan Hall – Regeneration, Housing & Place

Jemma Curtis – Regeneration Programmes Manager and Connor Smalls – Regeneration Programmes Officer.

No current High Street Rental Auction provision.

2. What change are you proposing?

- Briefly state what the change is.
- State whether the change is as a result of:
 - Capital and revenue bid prepared as part of the budget process
 - Formal service review report
 - Proposal for reduction, enhancement or change in service levels
 - New or amended Council policy
- State whether the change will result in a decision by Management or Members

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.

The empty properties officer and HSRA designation will aim to tackle commercial properties that impact on the town centre's vibrancy and perception as a place to visit. Encouraging these properties back into use through the work of the Empty Properties Officer will open up new opportunities for new businesses and jobs to be created which could assist reducing the number of people currently unemployed.

The decision is required by Cabinet.



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

- Which Corporate Strategy priority does this change support? (Documents available from our website)
- If it doesn't link to the organisation's aims, what justification is there for the change?

This would support the Corporate Strategy to:

Promote growth and prosperity to benefit West Norfolk

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

HSRA will work to reduce vacancy in the designated area (Southern High Street), create opportunities for new business and in turn new jobs. Bringing vacant units back into use supports the wider town centre ecosystem, increasing footfall and working towards the aims for a more vibrant town centre with a mix of uses. This also supports and aligns with the West Norfolk Economic Strategy, specifically in relation to Thriving Towns as well as the King's Lynn Ten Year Vision for the Pride in Place Programme and the emerging King's Lynn Masterplan.



4. What is your evidence of need for change?

- State if the requirement for change is statutory or discretionary – is this required under legislation?
- Or is it a response to
 - local issues/conditions
 - customer feedback
 - management issues
 - policy / political issue?
- State your evidence of the need for change. Is it...
 - Quantitative eg Norfolk Insight, Management Information, Financial data etc ?
 - Qualitative - research and consultation (see also Q9)?

High street vacancy, both residential and commercial, is harming King's Lynn's town centre by weakening economic vitality, encouraging anti-social behaviour and creating a poor impression of the town, this is recognised both a national policy level and locally within the Economic Strategy and King's Lynn Ten Year Vision for the Pride in Place Programme. Addressing long-term empty properties is therefore central to delivering the King's Lynn Ten Year Vision for the Pride in Place Programme, which aims to create a more vibrant, safe and inclusive town. This is also a theme supported by the emerging King's Lynn masterplan which seeks to encourage and enhance the vibrancy of the town centre by encouraging a mix of uses including cultural, leisure and residential density.

The scheme will be applied specifically to the southern section of King's Lynn High Street, where there is a recognised concentration of empty commercial premises. Stakeholders, residents and businesses have been raising their concerns about this area via public consultations and workshops due to the notable concentration of vacant units, it is therefore considered that the HSRA powers could have a focused impact on this area of town.

It is important to note that the Government has outlined that the logic of this new national policy is that the auction itself will be used as a last resort when proactive engagement with a landlord has not led to a successful outcome. Based on early experiences gathered by MHCLG from trailblazer authorities who have already designated HSRA High Street Areas, they have not had to implement the full auction process and have seen positive results following designation and proactive engagement with landlords. As such, it has been proven in live situations that having the policy established can help positively encourage landlords to take more proactive and open-minded approach to letting units.



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

- Will service quality be improved?
- Will costs be reduced / savings be generated?
- How does the balance between cost and quality change?
- If efficiency savings are being generated how will these be evidenced?
- Include data and information that links to health inequalities.

The HSRA designation will support the new role of Empty Properties Officer and adds an additional power that the council can leverage to initiate conversions with landlords and seek to tackle vacancy (in the designated area).

6. What geographical area does this proposal cover?

- State if the change is applied across the Borough or whether it is focused on a geographical area within the Borough, such as a town, facility or ward.
- Also state if there are cross-boundary implications.
- Include data and information that links to health inequalities.

Southern area of King's Lynn High Street – Appendix 1 Cabinet Report.



7. What is the impact of your proposal?

- What outputs will be achieved as a result?
- What will change?
- How will service users experience the change?
- What does success look like if you tripped over it?
- Have you considered the needs / barriers of those currently using / not using the service?
- What is the frequency of the impact?
- Include data and information that links to health inequalities.

Outputs

- Designation of Southern High Street for HSRA (Appendix 1)
- Potential for reduced vacancy in the designated area and town centre
- Support delivery of policy objectives in the town centre
- Communication with landlords to let units
- Additional power for the Empty Properties Officer to use.

HSRA can positively grow engagement with landlords and provide an impetus to address persistently vacant premises in addition to existing powers like Planning Enforcement. If the scheme is to operate as intended by Government, then a limited number of premises if any should reach rental auction stage as the landlord should have been positively engaged and proactively brings the premise back into use through collaboration.

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

- Discussion with other authorities who have implemented scheme.
- MHCLG Evidence.
- HSRA Government Guidance.
- Local and National Policy
- Public Consultation responses.



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

- King's Lynn Town Investment Plan Engagement (2021)
- King's Lynn Long Term Plan for Towns Consultation (2024)
- King's Lynn Plan for Neighbourhoods Pulse Survey (2025)
- King's Lynn Masterplan Consultation (2025-2026)
- Meeting with local stakeholders to southern high street businesses (2025)

High Street vacancy, empty buildings and the vibrancy of the high street are constant themes via consultation. The scheme will be applied specifically to the southern section of King's Lynn High Street, where there is a recognised concentration of empty commercial premises. Stakeholders, residents and businesses have been raising their concerns about this area via public consultations and workshops due to the notable concentration of vacant units, it is therefore considered that the HSRA powers could have a focused impact on this area of town.

If a Local Authority wants to engage and utilise the HSRA process, it must first define the high street or area where HSRA can be used. It is proposed to define this area to the southern part of the High Street in King's Lynn to tackle and focus on the existing concentration of vacancy in this part of the town centre (set out in Appendix 1). Once the area is identified, a community engagement period of at least 28 days must take place outlining the proposed 'Designated High Street' where HSRA can be used. This will inform adoption of the policy and designation. If a property is vacant or expected to become vacant soon, landlords will be invited to discuss how the Council can assist in facilitating occupancy, removing the need to initiate the HSRA process.



10. Are there any implications for other service areas?

- Will any other service areas be affected by your proposals?
- What implications will this have?
- Include data and information that links to health inequalities.

Recruitment of one FTE Empty Properties Officer post.

To implement HSRA and an Empty Properties scheme will require coordinated support across the following departments:

- The Councils regulatory departments, including Environmental Health & Planning Enforcement services
- Revenues Team (C Tax and Business Rates)
- Town Centre management – vacancy data and input into the vacancy register (already maintained by the Commercial Services team).
- Regeneration – identifying potential demand, agreeing area to be designated, identify target buildings, community consultation, identifying and engaging landlords.
- Property Services – surveying property conditions and works required to achieve minimum lettable standard, marketing and running auctions, tenancy agreements. Property Services would likely need to outsource this work due to the team's limited resources.
- Legal services in respect of enforcing action through the courts, for example pursuing enforced sales, and defending legal challenges.



11. What impact (either positive or negative will this change have on

- Have you considered the implications on groups with protected characteristics?
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual Orientation
 - Other (eg low income, caring responsibilities)

- For all of these consider issues of:
 - Access
 - Culture
 - Language
 - Stereotyping
 - rurality / isolation
 - safety & security
 - hate crime / discrimination
 - choice / opportunity
 - income / financial access
 - service take-up, including those not currently using the service (why might this be the case?)

- How might this change remove some of these barriers (if identified) or prevent barriers being created?
- Can any differences be justified as appropriate or necessary?
- Ensure you specifically address any protected groups where a positive or negative impact was identified on the pre-screening form in this section
- Include data and information that links to health inequalities.

Whilst the impact on specific people from the backgrounds above and in terms of protected characteristics would be Neutral, there would be an overall positive impact on communities in the town centre where properties have been empty for a long time. Empty properties can attract anti-social behaviour, be unsightly and detract from investment and most importantly in areas of how housing demand are wasted housing resource. Taking action to return empty properties to use will assist the council in supporting the priorities identified in the King's Lynn Ten Year Vision for the Pride in Place Programme, emerging King's Lynn Masterplan and supporting the Marmot Objectives of creating and developing healthy and sustainable places and communities following the principles of proportionate universalism.

There will be a disparity in the approach to empty commercial properties within the designated HSRA area and the rest of the town centre/Borough. However, it is considered that the designation in this area is fully justified for the reasons outlined.



different groups of the population?

12. Other staff involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Working Group reps

Mark Whitmore and Jemma Curtis



Full EIA Action Plan

Risk/adverse impact identified (Q11)	Action to be taken to mitigate	By who <i>Include a lead officer for implementing the actions</i>	By when <i>Deadlines/timescales for implementing the actions</i>	Monitoring mechanism <i>What indicators will you use to track the impact of the change when implemented?</i> <i>How will you review its implementation?</i> <i>How do you intend to monitor service take-up?</i>

Assessment Completed By: Connor Smalls

Job Title: Regeneration Programmes Officer

Date: 01/04/2026