

REPORT TO CABINET

Open/Exempt		Would any decisions proposed :			
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide		YES/NO	
	Discretionary /	Need to be recommendations to Council		YES/NO	
	Operational	Is it a Key Decision		YES/NO	
Lead Member: Cllr Simon Ring – Deputy Leader of the Council E-mail: cllr.simon.ring@west-norfolk.gov.uk		Other Cabinet Members consulted: Cabinet			
		Other Members consulted: Joint Panels			
Lead Officer: Honor Howell – Corporate Governance Manager. AWN Client Officer E-mail: honor.howell@west-norfolk.gov.uk Direct Dial: 01553 616550		Other Officers consulted: Kate Blakemore – Chief Executive Michelle Drewery – Section 151 Officer			
Financial Implications YES/NO	Policy/ Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening/ Full Assessment	Risk Management Implications YES/NO	Environmental Considerations YES/NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					

Date of meeting: 10 December 2024

RENEWAL PLAN FOR SWIMMING POOLS AND LEISURE CENTRES

Summary

This report presents Cabinet with a compelling case for the council to invest in a major facilities renewal strategy for its leisure venues.

It has long been recognised that physical activity plays a key role in promoting health and wellbeing. However, for both adults and children, the borough's levels of obesity/overweight are higher than the national average, whilst activity levels for both are lower than the national average. Moreover, there is significant health inequality within the borough, with life expectancy between the least deprived and most deprived areas being almost 7 years for men and 1.6 years for women.

Given this challenging position, the council is working closely with Sport England on developing a plan for increasing physical activity levels – especially amongst those groups which are least active. The borough has been designated by Sport England as one of the first 'Place Expansion' areas. These are areas deemed to be in greatest need and which may benefit from Sport England funding. Swimming pools and leisure centres play a vital role in creating active and healthy communities, but they also teach children (and adults) to swim and provide a community 'hub' for local people.

The council operates three swimming pools in the Borough. St James in King's Lynn, Oasis in Hunstanton and Downham Market Leisure Centre in Downham Market.

St James Swimming Pool opened in 1975 and Oasis Leisure Centre in 1984. Both of these facilities are now at the end of their economic life and both facilities have prohibitively high energy costs due to their design and require significant capital investment to keep them open and operating. Both pools are failing to deliver their important contribution to the council's strategic goals, namely effective and efficient service delivery, tackling health inequality, reducing our carbon emissions, and promoting the area as a great place to live, work, visit and invest. The subsidy paid by the council to operate the council's leisure facilities currently stands at £1.4m and is expected to increase.

Feasibility work has been conducted by an external Leisure Consultant on behalf of the council. This work concluded that the council should develop a capital investment plan to renew its swimming pools and leisure centres. This is an approach being adopted by many councils and will result in significant reductions in running costs, major increases in usage and income and improved health, social and economic outcomes.

This report outlines the options which have been explored and makes recommendations to progress the preferred options to RIBA Stage 2.

Recommendations

Cabinet is asked to:-

1. That Cabinet Resolves to authorise officers to progress Option Three detailed in Section 3.3.3 of the report and the related Options One and Two, detailed in Section 5 of the report, to RIBA Stage Two to enable a full Business Case to be developed for presentation to Cabinet in due course.
2. That Cabinet agree funding of £450k is allocated to the project from the 'Invest to Save' fund to enable work to be progressed to the stage set out in 6.1.1.
3. That Cabinet gives delegated authority to the Chief Executive, in consultation with the Corporate Governance Manager and Monitoring Officer to enter into a Framework Contract to carry out the Project.

Reason for Decision

To enable the council to undertake more detailed planning and consideration of the business case and potential capital costs of replacing and relocating St James Swimming Pool to Lynnsport, or another town centre location, and a rebuild and possible relocation of the Oasis Leisure Centre in Hunstanton.

1 Background

1.1 The importance of physical activity to health

It has long been recognised that physical activity plays a key role in promoting health and wellbeing. *‘The evidence is overwhelming that moving our bodies – through community sport, fitness, and physical activity – improves our lives, individually and collectively. From better mental and physical health to greater career opportunities and social cohesion, movement benefits us from the day we’re born through to old age’.* Sport England – *Uniting the Movement Strategy 2021*¹

However, for both adults and children, the borough’s levels of obesity/overweight are higher than the national average, whilst activity levels for both are lower than the national average. The borough’s general health is therefore worse than England averages, and whilst life expectancy is higher than national averages, ‘healthy life expectancy’ is lower with people living longer in ill health. Moreover, there is significant health inequality within the borough, with life expectancy between the least deprived and most deprived areas being almost 7 years for men and 1.6 years for women.

1.2 The importance of swimming pools and leisure centres

Given this challenging position, the council is working closely with Sport England on developing a plan for increasing physical activity levels – especially amongst those groups which are least active. The borough has been designated by Sport England as one of its first 100 ‘Place Expansion’ areas – these are areas deemed to be in greatest need and which may benefit from Sport England funding.

The emerging ‘Place Expansion Plan’ for the borough will range across all forms of physical activity – from walking and cycling to swimming and more traditional sports. The plan is currently in its earliest stages and is subject to further discussion and final agreement with Sport England. However, it is already clear that the borough’s swimming pools, and leisure centres have the potential to play a much greater role in promoting and sustaining physical activity.

Swimming pools and leisure centres play a vital role in creating active and healthy communities, but they also teach children (and adults) to swim; provide a community ‘hub’ for local people and are key to making a place attractive to live, work, visit and invest. Sport England research shows that deprived communities have a particularly strong preference for exercising in their local public pools and leisure centres.

However, since 2010, over 1000 swimming pools have closed in the UK and more are currently under threat. This results from a combination of cuts in local authority expenditure and the growing cost of increasingly

1. [Why investing in physical activity is great for our health – and our nation | Sport England](#)

old and expensive facilities. The response from many local authorities to this emerging crisis has been to replace old facilities (with high costs, high carbon and low usage) with new facilities with low costs, high usage and low carbon.

2. The borough's pools and leisure centres – current position

Two of the council's swimming pools are failing to deliver their important contribution to the council's strategic goals, namely, effective, and efficient service delivery; tackling health inequality; reducing carbon emissions and promoting the area as a great place to live, work, visit and invest.

Significant efforts by Alive West Norfolk staff have increased participation levels throughout 2024. In order to continue to raise participation and increase activity levels, the council must offer attractive facilities for residents to enjoy and want to visit.

2.1 St James

St James Swimming Pool opened in 1975 and is now at the end of its economic life. It has high running costs, particularly energy costs, escalating maintenance costs, deteriorating quality, limited capacity for income growth and visit levels have not recovered to pre-pandemic levels.

2.2 Oasis

The Oasis opened in 1984 and like St James is at the end of its economic life. It has high energy bills, mainly due to poor roof insulation. The facility has aged significantly and is no longer an attractive leisure facility for either the residents it serves or the tourism market.

2.3 Downham Market

The pool at Downham Market Sports Centre opened in 1993 and is operating well with no significant issues at the present time.

2.4 The subsidy for running the leisure centres and swimming pools is circa £1.4m, mostly made up of staff costs, utilities, and maintenance.

2.5 The borough's venues are therefore increasingly unable to meet the expectations of local people – particularly St James and Oasis - and require increasing council spend to keep them open and operating. This spiral of long term under investment in the facilities, increasing costs and faltering health and community returns is something the council should address as soon as possible as costs will only increase and therefore, increase the burden on the taxpayers of West Norfolk.

3 Strategic Options

3.1 Officers have been working closely with Sport England on assessing the current condition of the facilities and considering future options. With support from a national leisure consultant, Max Associates, a review of the facilities, together with a feasibility study and community consultation has identified opportunities for the council to consider which would fulfil the council's strategic goals as well as deliver best value. (Executive Summary of Max Associates report is attached at Appendix A).

3.2 A national Sport England study demonstrated that for every £1 invested in new venues, there will be a return of approximately £4 in improved health, social and economic outcomes. The community engagement exercise conducted by Max Associates identified 'improved facilities' as a primary factor that would encourage individuals to be more active and confirmed swimming as the top preference amongst those people wanting to be more active.

²

3.3 The feasibility study identified three options:

3.3.1 Continue to operate the venues with a commitment to meet the increasing operating and maintenance costs and accepting that income and health outcomes will continue to decline.

3.3.2 Phased closure and reduction of facilities. Operate venues until they reach the end of their economic life and then close them without a commitment to replace them resulting in fewer venues. Given the borough's growing physical activity and health challenges and the recent Sport England modelling which confirmed the continuing need for at least 3 public swimming pools in order to adequately serve the area, a policy of phased venue closure will only serve to reinforce the borough's health inequalities, undermine its reputation as a 'great place to live/work/invest/visit' and will likely be met with both strong public resistance and dismay amongst key partners such as Sport England.

3.3.3 Invest in a renewal plan to replace and upgrade facilities. Produce a strategic investment plan to replace and/or renew venues in advance of any forced closures. This would curtail escalating costs, sustain current levels and distribution of service and as far as possible to synchronise venue closures with their replacement, although it should be acknowledged that this may not be achievable. This has the potential to create a virtuous circle of lower running costs, high quality services, increased income, improving usage levels (including significant numbers of new users) and resulting major uplifts in policy returns – especially health improvement.

3.4 The feasibility work conducted by Max Associates concluded that the council should develop a capital investment plan to renew its swimming pools and leisure centres. Central to this should be a strategic priority to

² [Social and economic value of sport and physical activity - summary.pdf](#)

deliver three sustainable public swimming pools within the borough to promote mass participation, health improvement for all age groups, essential learn to swim skills and the school curriculum and to support tourism in Hunstanton. Max Associates were then asked to conduct an outline feasibility study as the basis for the new plan.

- 3.5** A central element of the plan should be the borough's future needs for public swimming pools. The council therefore utilised Sport England's 'demand and supply' modelling for pools to assess needs over the coming 10 years. This showed that given the borough's highly dispersed population, it should provide a minimum of three public swimming pools to adequately satisfy the existing and future demand for swimming. The model also assessed both the condition of existing pools and potential best locations for future pools. The conclusion was to replace and relocate St James with a new pool and learner pool at Lynnsport (integrated into the existing and/or redeveloped leisure centre) or an alternative town centre location; retain Downham Market pool and replace the Oasis pool with a new small/medium size pool in Hunstanton.
- 3.6** The consultants also utilised analysis of catchment populations being served by the existing and proposed centres; previous needs assessment work carried out by the council; analysis of competing provision; usage levels for different activities within the venues and 'market penetration' rates in order to calculate 'latent/potential' future demand.

The key findings are:-

- a) there is considerable latent demand for new fitness provision (gym and studio space) across the borough
 - b) there is an opportunity to develop facilities for the emerging sport of padel (a small court variant of tennis)
 - c) the borough should consider options to increase provision for gymnastics
 - d) the borough should keep under review the need for further sports hall provision – albeit on a small scale
 - e) the current provision of squash and indoor bowling operates significantly below capacity (i.e. underutilised) and therefore existing levels of provision should be reviewed. Indoor bowling, in particular, was identified as delivering low usage and income, with highly seasonal demand and extensive space requirements.
- 3.7** The consultants surveyed almost 800 people – adults and young people (high school age) - about their activity levels, challenges they faced in being more active and their future needs. Whilst not a scientific sample, the survey (as mentioned earlier) cited 'improved facilities' as a primary factor that would encourage individuals to be more active and confirmed swimming as the top preference amongst those people wanting to be more active.

- 3.8** The consultants also reviewed a range of recent facility investments by other councils. The overwhelming finding was that new facilities dramatically reduce running costs; significantly increase activity levels – including from those who previously didn't use facilities; improve satisfaction levels; boost the 'look and feel' of an area and command strong community support, even amongst people who were not intending to use them.

4. Current facility performance and condition

The key findings on the performance and condition of the existing venues are:

- a) The net cost in 2024/25 to the council of running its pools and leisure centres is around £1.4m with forecasts for future years showing a continued increase.
- b) The average cost recovery (income contribution to costs) is only around 76% compared 101% for facilities operated under a similar management model.
- c) Visits levels are better than expected given the quality of many of the venues, but they continue to struggle to reach pre-pandemic levels.
- d) The personal service provided by staff is excellent and venues are well presented in terms of cleanliness etc.
- e) The venues account for almost 40% of the council's overall carbon emissions and St James and particularly Oasis are highly energy inefficient.
- f) The venues have suffered significantly from a lack of investment and as a result there is a major maintenance backlog. For example, 2022 condition surveys indicate that at today's prices the venues collectively require more than £5m of maintenance works to remain open over the next few years. St James and Oasis are the main drivers of these costs, with St James alone requiring over £2m to remain open over the next 3 years.
- g) the consultants confirmed that in their view both St James and Oasis 'are past their economic lives'.

5. A renewal plan - the key options

Within the context of the strategic priority to deliver three sustainable public pools and based on the analysis of needs, performance and venue condition, the consultants have recommended a number of options as the building blocks for a renewal plan. These are set out below.

- a) Option One:- replace and relocate St James pool with a new 25m x 6 lane pool and learner pool at Lynnsport or an alternative town centre location. This can be achieved either as a first phase project which integrates the new pool (with new dedicated pool changing) into the existing on-site facilities or instead, as part of a simultaneous whole site refurbishment or replacement of existing facilities. The first phase pool-only option is estimated to cost approximately £16.2m

and can be orientated and designed to 'future proof' it, if necessary, for a seamless wider integration with a second/later phase redevelopment of the existing facilities. The new pool could deliver up to £540k net annual revenue improvement; increase usage (compared with St James) by 50,000 visits per year and improve operating performance (cost recovery) from 80% to 98%. Given the impending major maintenance costs at St James and the continuing/growing subsidy levels, it would be sensible to accelerate the delivery of this new pool to the earliest possible date and to aim for a synchronised closure and opening of the old and new pools if feasible.

- b) Option Two – replace Oasis at an existing or alternative site in Hunstanton. Preferably at or near the seafront in a highly visible location to retain and further increase tourist usage. It should include a 25m x 4 lane pool with a water splash area; soft/adventure play; fitness gym and studio and café. The estimated cost is circa £27.8m including approximately £800k for replacement public toilets; deliver approximately £383k net annual revenue improvement; increase usage by around 126,000 (many of which will be from new users) and dramatically improve operating performance (cost recovery) from 58% to 92%. Because of major impending maintenance costs of the Oasis and the continuing/growing subsidy levels, the council should aim to develop a replacement for Oasis either simultaneously with the new pool in King's Lynn or as a rapid 'follow on' development. Whilst the feasibility study identified two other existing pools in Hunstanton, these are both privately owned (albeit with some limited public access) and cannot be seen as secure and accessible long-term alternatives to a replacement public pool for the north of the borough.
- c) Option Three – redevelop the existing 'dryside' facilities at Lynnsport (fitness, gymnastics etc) either at the same time as the new pool or as a later, second stage development. The existing facilities have been developed incrementally over the years resulting in a complex, albeit significant, collection of facilities with poor customer flow and management control. The initial feasibility study included a high-level review of options for wider redevelopment of Lynnsport ranging from a new pool with expanded fitness and soft play at a total cost of around £41m through to these, plus expanded gymnastics at around £44m. However, there are three important points to note:- (a) further feasibility work is required to fully assess the options relating to these facilities; (b) the return on improved net annual revenue compared to the capital cost of these wider options is likely to be much lower than the improved revenue return on Option One i.e. investing in the pool and (c) replacing the pools at St James and Oasis as part of the borough's strategic priority of 'three sustainable pools' should ideally not be compromised by a prior financial commitment to a wider redevelopment of existing facilities at Lynnsport;
- d) Option Four – provide additional fitness facilities (enlarged gym and extra studio) and general refurbishment of Downham Market leisure centre. It will cost approximately £9.7m and deliver around £63k net

annual revenue improvement; increase usage by 34,000 visits per year and improve operating performance (cost recovery) from 90% to 97%. This should remain the lowest priority because the centre is in a relatively good state of repair and is already successful in terms of usage levels and cost recovery. Furthermore, prior to future investment the council will need to review the lease and operating arrangements with its on-site partner, the school academy.

6.0 Conclusion and Recommendations

6.1 The consultants have recommended that the council consider adopting a phased approach to the options to secure the strategic priority of delivering a network of sustainable pools within the context of an inevitably challenging funding environment. In summary, the recommendation to Cabinet is:

6.1.1 That Cabinet resolves to authorise officers to progress options one and two through to RIBA Stage Two to enable a full business case to be developed for presentation to Cabinet in due course.

6.1.2 That Cabinet agree funding of £450k is allocated to the project from the 'Invest to Save' fund to enable work to be progressed to the stage set out in 6.1.1.

7.0 Next Steps

7.1 Should Cabinet resolve to agree to progress to RIBA Stage 2 for a new swimming pool in King's Lynn and to rebuild the Oasis in Hunstanton, there are options for how this work is carried out. For this project, it is recommended that the council utilise an established construction framework as it can be one of the most efficient and effective ways to save both time and money and to engage the required type and level of expertise.

7.2 Construction frameworks offer a route to compliantly procure a contractor without the requirement for a long and costly tendering process. Framework providers have pre-tendered with contractors, allowing authorities to reduce costs and speed up delivery. In addition to providing a fully compliant route to procure a construction partner, a framework provider can also offer an 'end-to-end' service that supports the council throughout the process.

7.3 A framework approach will allow an early start and speedy progress on moving towards RIBA Stage 2 on the project as well as minimising the demands on the council's own project management resources which is currently at full capacity. The Project Manager provided by the framework will manage the relationship with the contractor alongside a level of 'leisure client' input to give facilities/service input

and to manage stakeholder engagement with partners such as Sport England.

7.4 To progress to RIBA Stage Two, the following key tasks will be carried out:

- a) Pre-application Planning Consultation
- b) Design Development – detailed technical design brief
- c) Capital Cost Plan – pre-tender cost estimates
- d) Business Plan – refine business plan in line with detailed design and cost plans
- e) Risk Analysis – develop the project risk register including impact and probability
- f) Governance Structure – define the governance structure for delivering the project
- g) Project Programme
- h) Transport Planning – complete a transport assessment and travel plan as required
- i) Consultation – with key stakeholders and the public to identify issues and further requirements
- j) Site Surveys – environmental, flood risk etc

8. Financial Implications

8.1 The renewal plan and its associated options have been developed to ensure the council has the choice to phase the implementation and thereby secure incremental funding solutions.

8.2 Initial estimates to build a swimming pool at Lynnsport (although this location has not been finalised, the cost estimates are based on a replacement swimming pool being built at Lynnsport) and to replace the Oasis total approximately £44m. Note however, that plans are not yet at detailed design and fully costed stage.

8.3 Further detailed work will take place on funding options during the next phase of the project which, subject to Cabinet approval, would be to move the preferred options to RIBA Stage 2. Depending on the preferred options identified by Cabinet, the estimated cost of developing options one and two would be up to £450k. This can be funded from the council's 'Invest to Save' fund.

9 Personnel Implications

9.1 There are no personnel implications identifiable at this stage.

10 Environmental Considerations

10.1 Energy and water are a major cost for all pools and leisure centres. They currently make up around 25% of the borough's operating costs for its four leisure venues which in turn amount to almost 40% of the council's total carbon emissions. St James (with its deep water) and Oasis (via

the roof) are particularly energy inefficient, and their designs belong to a different era where energy costs were lower and carbon emissions were an unknown concern. The 'utility' costs (energy and water) at over £1m per year are second only to staff costs and are a key factor in the venues continuing to have relatively poor 'cost recovery' performance. However, new leisure venues offer major reductions in energy and water costs, with the best enjoying in excess of 50% reductions. The initial business planning for the replacement venues assumes major energy and water cost reductions and these are a key driver in the significant improvements in net annual revenue. Therefore, the investment in new venues will offer both a financial and environmental step change in the borough's leisure venues and the details of these gains will emerge as the options are further developed.

11 Statutory Considerations

11.1 There are no Statutory Considerations at this time.

12 Equality Impact Assessment (EIA)

12.1 A Pre-Screening EIA is attached to this Cabinet report.

The following should be noted:

- a) A continuing commitment to subsidise the existing facilities whilst not directly additionally disadvantaging any group, will fail to improve services to groups whose needs are currently unmet or only partially met. It will also carry an 'opportunity cost' of resources being locked into the existing services which could in fact be better spent on alternative leisure services which could better meet the needs of disadvantaged groups.
- b) Phased closure and reduction of facilities – this will additionally disadvantage some groups whose needs are fully or partially met by the existing facilities. It will also fail to address the needs of those groups whose needs are not currently met.
- c) Invest in replacement facilities – this provides the opportunity to better serve those groups who currently use the existing facilities, but also crucially it will extend opportunity to groups whose needs are not met by the existing facilities. Clearly, replacement facilities may offer services that are different from those offered by the existing facilities. In which case, the changes in service and any impacts will need to be assessed in the emerging EIA Assessments as the strategy unfolds. This option provides an opportunity to consider all equalities issues from the very earliest design stage through to implementation.

13.0 Risk Management Implications

13.1 Major capital projects inevitably present a range of risks. If any of the options presented in this report are to be progressed, then a risk register

will be established to manage, mitigate and where possible transfer emerging risks. Whilst the council will reasonably seek to transfer risks to its development contractors, due to the nature of some risks and the cost premium attached to transferring certain ones, some risks may need to be retained and managed by the council.

Examples of potential risks include:

- Cost escalation
- Delays in the programme
- Income level assumptions
- Planning permission
- CO2 saving assumptions
- Energy saving assumptions
- Assumptions on capital receipts
- Stakeholder engagement, customers, user groups, sports bodies
- Conformance with sport's governing body requirements e.g. pool specifications

13.2 A risk strategy and risk mitigation plan will be developed for the project in due course. It is important to note that at this stage, the risk is the investment of up to £450k in potentially abortive costs by the council to progress one or more of the renewals options and for the council to subsequently decide not to progress the work any further.

13.3 Cabinet should also note the risk and impact arising from the potential closure of one or both facilities before a replacement is in operation. Full consideration and mitigation plans will be considered and presented in any future business case.

13.4 The potential relocation of St James will result in a large, council owned, prominent site becoming vacant. Options for the future alternative use/purpose of this asset will form part of the next stage of the project.

14.0 Declarations of Interest / Dispensations Granted

14.1 None

15.0 Background Papers

15.1 None.

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

Stage 1 - Pre-Screening Equality Impact Assessment

Name of policy/service/function					
Is this a new or existing policy/service/function? (<i>tick as appropriate</i>)	New	X	Existing		
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.	<p>Improve levels of physical activity – and thereby improve health and reduce health inequalities in the borough</p> <p>There are no statutory obligations to provide these services – apart from an obligation on schools to teach children to swim 25m</p>				
Who has been consulted as part of the development of the policy/service/function? – new only (<i>identify stakeholders consulted with</i>)	<p>No one at this stage has been directly consulted on the proposals. This will happen in the next stage</p> <p>A physical activity survey of 800 people was conducted to determine challenges and preferences around physical activity</p>				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</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	
	Other (eg low income, caring responsibilities)	X			

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	Yes / No	No
3. Could this policy/service be perceived as impacting on communities differently?	Yes / No	Some communities close to St James pool might feel disadvantaged if the pool is replaced at Lynnsport This will be addressed as part of the public consultation, planning and transport assessments
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes / No	No
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	Yes / No	Actions:
		Actions agreed by EWG member:
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>		
Assessment completed by: Name	Honor Howell	
Job title	Corporate Governance Manager/Assistant to the Chief Executive	
Date completed	22.11.24	
Reviewed by EWG member		Date

Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)