

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



Project Initiation Document

New Local Plan 2026-2044



October 2026

Project Initiation Document for the Borough Council of King's Lynn &
West Norfolk Local Plan 2026-2044



BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK LOCAL PLAN PROJECT INITIATION DOCUMENT

Overview

0.1 Project Title:

Borough Council of King's Lynn & West Norfolk Local Plan (2026 – 2044)

0.2 Version:

1.0

0.3 Date:

26 October 2026

0.4 Purpose of this PID document:

This Project Initiation Document (PID) sets out the management framework and approach for delivering the new Local Plan. It provides clarity on the plan's scope, governance arrangements, resources, and timelines. The PID is designed as an internal reference tool for the team, stakeholders, and council leaders, supporting effective decision-making and ensuring everyone involved understands their roles and responsibilities throughout the plan-making process.

The PID is a live document which will be reviewed and updated at each key stage of plan making (before each Gateway stage) or every 6 months. It will also be updated should any other significant changes occur.

Keeping the PID regularly refined and updated at each stage ensures that it stays relevant and can reflect all changes that arise from new evidence, engagement insights or emerging risks to keep stakeholders informed at key milestones.

1. Plan Scope

1.1 Role of Plan

As a Local Planning Authority (LPA), the Council has a statutory duty under the Planning and Compulsory Purchase Act 2004 (as amended), the Levelling Up and Regeneration Act 2023, Planning and Infrastructure Act 2025, and associated Regulations, including the Local Plan Regulations 2026, to prepare and adopt a Local Plan.

Our Local Plan will establish how land within our area will be used and developed, setting out priorities for housing, employment, Infrastructure, design and environmental standards. It will provide a clear, deliverable, and legally compliant spatial strategy and policy framework to guide the development and infrastructure investment replacing the existing Local Plan 2021-2040 which was adopted in March 2025, in its entirety.

The Government has made it clear that Local Government Reorganisation (LGR) and Devolution are not reasons to delay or stop local plan making as coverage of up-to-date local plans is seen as a key building block of the planning system.



Our policies must deliver the required level of new homes, contribute to climate change mitigation and adaptation, avoid inconsistency with national decision making policies, and align generally with any operative spatial development strategy relevant to our area.

The legislation empowers the Secretary of State to specify matters our plan must or may address. Once adopted, our Local Plan will serve as the principal basis for making planning decisions, directly shaping the future growth, development, and sustainability of our communities.

The preliminary stage of plan-making (Scoping Consultation, September 2026) will enable the Council to set a distinctive vision and strategic objectives. The guidance (Preparing a local plan vision - GOV.UK) sets out best practice for developing a vision, which should be supported by no more than 10 measurable outcomes (strategic objectives). Further details are set out below.

1.2 Summary of Plan Scope:

The BCKLWN Local Plan's primary focus is to provide a planning policy framework for the Borough that meets the Local Housing Need (LHN) over the short, medium, and long term (looking at least 15 years ahead from the date of adoption), while protecting the Borough's rich natural, historic and built environments. It may also seek to set local standards where appropriate.

In scope: As required by national guidance the Local Plan will:

Vision and Strategic Objectives

- Set a clear vision for the area and up to 10 measurable outcomes.
- The vision will be developed in conjunction with councillors and utilise the findings of previous consultations. The vision must provide a holistic framework which sets clear direction for the spatial strategy and policy development setting out how we will accommodate different land uses, approach infrastructure delivery and promote healthy, safe and inclusive places.

Spatial Strategy

- Identify areas for growth, regeneration and protection and provide a clear approach to housing and employment distribution, including affordable housing, the housing needs of specific groups and density targets.
- The strategy will reflect the housing distribution policies as set out in the National Planning Policy Framework.

Site Allocations

- Allocate land for housing, employment, mixed-use development and any sites or areas for strategic infrastructure or environmental benefits.
- The allocations will need to be suitable, available and achievable within the plan period, taking account of viability and other planning related constraints.

Development Management Policies

- Include development management policies that avoid duplicating those in the NPPF and will be focused on local issues, it is anticipated policies will address affordable housing, density



standards, housing type and mix, water efficiency and the protection of local green spaces and heritage assets.

- The NPPF specifies the themes/topics (e.g. affordable housing or water efficiency standards) for which the local plan can set local standards through the plan.

Developer contributions, infrastructure and delivery

- Set out the contributions expected from development, linked to the development plan viability assessment.
- Be supported by an Infrastructure Delivery Plan (IDP) covering infrastructure requirements including those relating to transport, utilities, schools and health facilities.
- Link to Community Infrastructure Levy (CIL) or equivalent funding mechanisms.

Other legislative requirements

- Underpinned by a Strategic Environmental Assessment (SEA), undertaken in parallel with plan-making ([The Environmental Assessment of Plans and Programmes Regulations 2004](#))
- Underpinned by an appropriate assessment, as required by [The Conservation of Habitats and Species Regulations 2017](#) (as amended).
- Underpinned by an Equalities Impact Assessment (EIA), as required by the Equality Act 2010.

Environmental requirements

- Address key policy areas including climate change (mitigation and adaptation).
- Set local standards for matters such as water efficiency.

Design codes/concept masterplans

- The main plan can be supported by design codes or concept masterplans that provide design guidance for specific types of development or development locations across the borough.

✗ What will be out of scope

- Development Management Policies - that duplicate national planning policy and/or guidance.
- Neighbourhood-level detail – that can be picked up by neighbourhood plans or supplementary plans.
- Detailed public realm requirements – such as areas for improving paving, benches, railing, public art etc.
- Non-land-use matters – governed by separate legislation, i.e. items covered by building regulations (Future Homes Standard, falls from height, building performance and construction standards), items covered by licensing, highways maintenance and highways orders, traffic regulation orders.
- Site-specific assessments required at application stage – i.e. Flood Risk Assessments (FRAs), Heritage Impact Assessments and Appropriate Assessments.
- Minerals and waste plans - which will be completed separately.
- Neighbouring authority areas (e.g. Breckland Council – the Local Plan will not set policy for areas set outside BCKLWN); cross-boundary issues are addressed via a Statement of Common Ground within the [Norfolk Strategic Planning Framework](#) and/or other bespoke Statements of Common Ground with other adjacent authorities (e.g. Cambridgeshire and Peterborough Combined Authority).



Any material change to the scope following Gateway 1, or any new sites or policies introduced after Gateway 2, will require Senior Responsible Officer (SRO) / Portfolio (PH) Approval.

1.3 Relationship with other relevant plans and programmes at the regional or local level:

The Local Plan forms part of the wider strategy for managing development, growth, and investment for the Council. It plays a significant role in directing growth to appropriate locations and securing the infrastructure required to meet local housing needs and economic needs, with reference to housing and employment market areas. This will be achieved through cooperation and collaboration with local and strategic partners.

The 2025 Norfolk Strategic Planning Framework (NSPF) defines agreed housing markets for Norfolk (Figure 4). The Borough is a self-contained housing market area, so there is an agreement (Agreement 4) between the Norfolk planning authorities that a separate Local Plan will be produced for King's Lynn and West Norfolk.

The Plan also supports other local and regional corporate plans and decisions such as skills and job creation, the regeneration of communities, and supporting change at a neighbourhood level listed below:

National

- National Planning Policy Framework (2026)
- The Town and Country Planning (Local Planning) (England) Regulations 2026
- Levelling Up & Regeneration Act (LURA) 2023
- Planning & Infrastructure Act (P&I) 2025
- Planning Practice Guidance

Regional (Norfolk and Suffolk)

- Norfolk Minerals and Waste Local Plan 2023-2038 (adopted May 2025)
- Local Growth Plan: Norfolk Economic Strategy 2024-2029
- Norfolk Spatial Planning Framework (NSPF) 2025.
- Norfolk Local Transport Plan
- Norfolk Local Nature Recovery Strategy (LNRS) 2025
- Norfolk Coast National Landscape Management Plan 2025-2030
- Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy Plan 2024 (GIRAMS)
- Norfolk Planning in Health Protocol 2024

Local

- Borough Council Corporate Plan 2023-2027
- West Norfolk Economic Vision and Strategy (November 2024)
- Infrastructure Delivery Plan (September 2022)
- King's Lynn Master Plan
- Hunstanton Master Plan
- Southeast King's Lynn (West Winch) Growth Area Framework Masterplan (January 2023)
- Strategic Housing Strategies – Homelessness Strategy; Tenancy Strategy; Housing Assistance Policy; Social Housing Allocations Policy



- Wider regeneration initiatives
- Brownfield Land Register
- Custom and Self-Build Position Statement and Action Plan
- Housing Delivery Test Action Plan (2024, updated 2025)

Neighbourhood (Parish)

- Neighbourhood Plans ([Neighbourhood plans | Borough Council of King's Lynn & West Norfolk](#))

Existing Development Plan Documents and Supplementary Planning Documents will be superseded by the new BCKLWN Local Plan. The new Local Plan will provide an updated spatial strategy for the area. This will then impact the weight that can be attributed to existing Neighbourhood planning policies. Any new Neighbourhood Plans or revised versions will need to conform with the strategic policies set out within the new Local Plan.

2. Plan Timeline

2.1 Plan Stage:

The key activities in local plan-making and the sequence of these events are set out below. Before these tasks and the formal notice to commence Plan Making is issued, preparation activities can take place. The Council has already completed an initial 'call for sites' consultation, carried out early engagement activities with Councillors through the Local Plan Task Group, Parish Councils and agents/developers, along with starting evidence gathering. The 30-month process runs from passage through Gateway 1 to plan adoption and includes further consultation throughout the process.

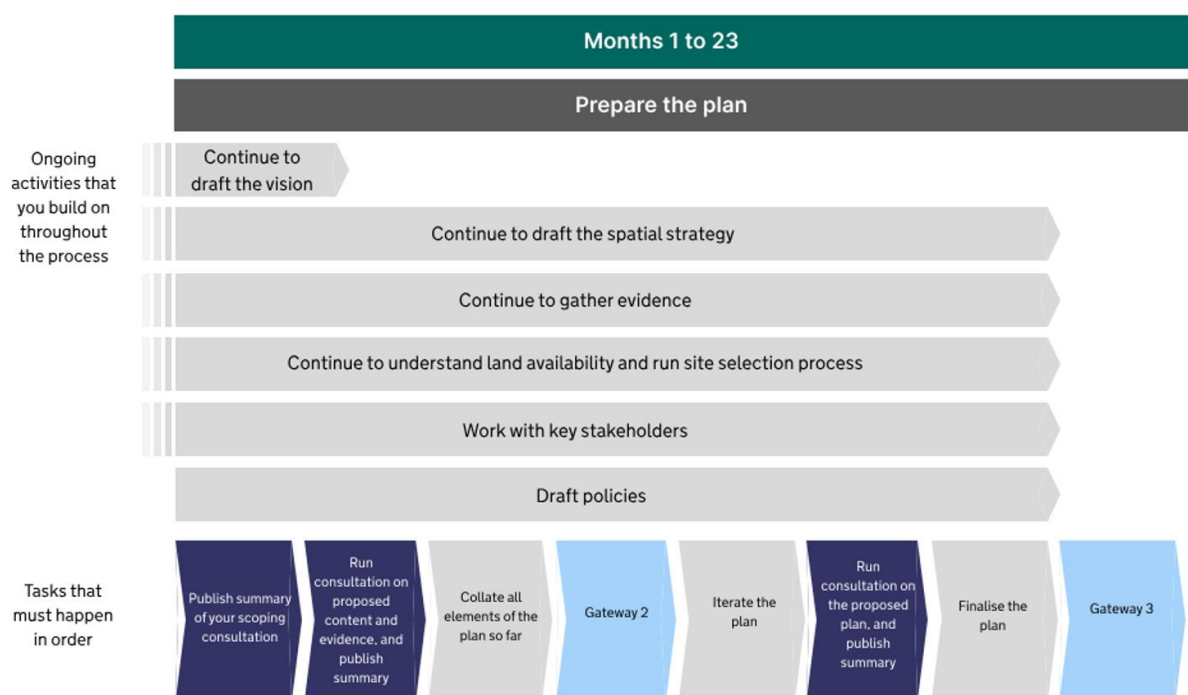
Updated Local Plan Timetable

The Government requires us to set a 30-month timetable for preparing the next Local Plan:



[Timetable for preparing the King's Lynn and West Norfolk Local Plan](#)





2.2 King's Lynn & West Norfolk Local Plan Summary Timeline

Ref	Activity	Indicative Start: Month/Year	Indicative End: Month Year	Sign-off authority
1	Prepare and Approve PID along with Timetable	1 st June 2026 – 29 th October 2026	October 2026	Portfolio Holder Chief Executive/ Deputy Chief Executive/ Assistant Director
2	Publish Notice of Intention to Commence and Local Plan Timetable (Regulation 19)	15 th June 2026	June 2026	Assistant Director
3	Scoping Consultation (Regulations require a minimum of 21 days; we will undertake the consultation over a period of 4 weeks) (Regulation 20)	1 st – 29 th September 2026	September 2026	Cabinet



Ref	Activity	Indicative Start: Month/ Year	Indicative End: Month Year	Sign-off authority
4	Gateway 1 (Self-Assessment) and commencement of formal Plan Making (Regulation 21)	30 th October 2026	October 2026	Updates delegated to Assistant Director
5	Publish scoping consultation findings (Regulation 22)	2 nd November 2026	November 2026	Assistant Director/ Portfolio Holder
6	Collating and Procuring Evidence	1 st April 2026 - Ongoing	Into Early 2027	Deputy Chief Executive/ Assistant Director
7	Prepare Vision and Strategy for consultation	2 nd – 30 th November 2026	November 2026	Portfolio Holder (advised by Local Plan Task Group)
8	Site Assessment and selection	1 st September – 31 st December 2026	December 2026	Assistant Director
9	Development of plan content and evidence (including draft vision, aims and objectives, proposed spatial strategy, summary of evidence and other elements).	4 th January – 1 st April 2027	March 2027	Portfolio Holder (advised by Local Plan Task Group)
10	Consultation on proposed local plan content and evidence – Draft Plan (Regulation 23)	17 th May – 30 th June 2027	June 2027	Assistant Director
11	Publish draft plan consultation findings (Regulation 24)	June 2027	June 2027	Assistant Director
12	Gateway 2 (PINS) Seeking Observations from the planning inspectorate on the Draft Plan and supporting evidence (Regulation 26).	1 st November – 31 st December 2027	December 2027	Portfolio Holder/ Assistant Director
13	Proposed Plan Consultation (8 weeks) on pre-submission Draft of Local Plan (Regulation 27).	1 st April – 16 th May 2028	May 2028	Cabinet



Ref	Activity	Indicative Start: Month/ Year	Indicative End: Month Year	Sign-off authority
14	Publication of proposed local plan consultation findings (Regulation 30)	May 2028	July 2028	Assistant Director
15	Gateway 3 (PINS) Testing whether the Local Plan has met the 'prescribed requirements' and can proceed to examination (Regulations 31/ 32).	1 st September – 30 th October 2028	October 2028	Portfolio Holder (advised by Local Plan Task Group)
16	Plan Submission (post Gateway 3) (Regulation 34)	1 st November 2028	November 2028	Assistant Director
17	Independent Examination of Local Plan (Indicative) (Regulations 35/ 36)	1 st November 2028 – 16 th March 2029	March 2029	Assistant Director
18	Publication of the recommendations and reasons (Inspectors' Report) (Regulation 37)	April 2029	April 2029	Assistant Director
19	Plan adoption (Indicative) (Regulation 39)	31 st May 2029	May 2029	Cabinet and then Council.

2.2 In setting out this timeline it is assumed that there will be timely publication of national planning policy guidance on key issues and topic areas such as SEA. It is also assumed that central government policy remains stable during the lifetime of the plan. The Local Plan Timetable will be updated regularly (at least monthly), to reflect the current position.

2.3 This timeline is dependent on:

- Outcome of Local Government Reorganisation;
- Stable team/ sufficient resources.
- Continued joint collaborative working across the organisation.
- Cross boundary working.
- Continued political support.
- Timely delivery of evidence.
- The timely publication of regulations, national planning policy and guidance.

2.4 These aspects are picked up in the risk register in section 8 Risks and Mitigation.



3. Governance and Decision Making

3.1 Summary of Governance

To ensure the efficient and effective delivery of the Local Plan Review with suitable oversight, it will be subject to a formal project management and operational structure. The governance is set out below, with a description of roles and responsibilities.

Governance Structure:

Role	Responsibilities
Senior Responsible Officer – Assistant Director (Environment and Planning) – Stuart Ashworth	Oversight of the plan-making process (led by the Planning Policy team). Review key outputs throughout the process, liaising with the Portfolio Holder and Planning Policy team. Day-to-day decision-making on operational matters, through delegated powers (Scheme of Delegation, December 2025).
Portfolio Holder – Cllr Jim Moriarty	Provide political leadership. Review key outputs throughout the process and act as the primary liaison with Cabinet.
Local Plan Task Group (Member & Officer Group)	Oversees overall delivery. This Task Group, which was appointed by Cabinet, advises the Portfolio Holder (Chair) and reports to Cabinet. It operates as a proxy Member Panel, meeting in public (broadcast via YouTube and formally logged), advising and reporting directly to Cabinet.
Cabinet	Holds formal decision making responsibilities for the local planning authority at the critical stages. Responsible for key decisions at statutory milestones; e.g. authorizing documents for key statutory consultations: <ul style="list-style-type: none">• Regulation 20: Scoping consultation• Regulation 27: Consultation on the proposed local plan/ pre-submission draft• Regulation 39: Recommendation to Council re Local Plan adoption
Full Council	Responsible for: <ul style="list-style-type: none">• Regulation 39: final adoption of Local Plan following Cabinet recommendation



3.2 Council Lead (Portfolio Holder):

Cllr James Moriarty - Portfolio Holder for Planning & Licensing

3.3 Local Plan Sponsor (Lead Officer) and Senior officer engagement approach:

- Kate Blakemore (Chief Executive)
- Michelle Drewery (Assistant Chief Executive)
- Stuart Ashworth (Assistant Director)

The Decision to undertake a new local plan, whilst a legal and policy requirement, has been taken by the Borough Council. This is reflected in the latest Corporate Plan. The Planning Policy Manager will keep the Assistant Director and Portfolio Holder informed of progress on a regular basis, and likewise the Assistant Director will do so for the Assistant Chief Executive and Corporate Leadership Team.

3.4 Escalation governance for risk management:

Where risks, issues or delays cannot be managed within the Planning Policy team, or where they may affect the agreed scope, timetable, budget, evidence programme or statutory compliance of the Local Plan, they will be escalated through the project governance structure. The Planning Policy Manager and Project Manager will first review the issue and agree proposed mitigation. Material risks will then be raised with the Assistant Director / Senior Responsible Officer for direction and, where required, escalated to the Portfolio Holder, Local Plan Task Group, Corporate Leadership Team, Cabinet or Full Council depending on the nature and scale of the decision required. Escalation should be supported by a clear record of the issue, impact, options, recommendation, decision required and any effect on the Local Plan timetable or risk register.



4. Staff Resource and Management

4.1 Local Plan Manager (Overall Manager of Team and Process):

Name	Job Title	FTE
Alex Fradley	Planning Policy Manager	1

4.2 Local Plan Team:

Job Level 1 (assistant/graduate), 2 (planner/senior), 3 (principal/sub-team leader)	Post status (filled / vacant)	Job Title	FTE	Estimated % time in a 12-month period on Local Plan
3. Mike Burton	F	Principal Planner	1	100
3. Luke Brown	F	Principal Planner	1	100
2. Claire Dorgan	F	Senior Planner	1	85
1. Henry Anthony	F	Graduate Planner	1	100
1. Sandra Homcenko	F	Graduate Planner	0.8 (Uni)	80
3. Michael Hadley	F	Local Plan Support Officer	1	100%

4.3 Project Manager:

Job Level	Job Title	Dedicated PM? Y or N – other responsibilities
3. Michael Hadley	Local Plan Support Officer / Project Manager	Y

4.4 Corporate Support Needs:

What is required	Timescales	Who will deliver (Teams and Job Titles)
Communication	March 2026 – May 2028	Corporate communications and Head of corporate communications
Consultation	February 2027 – February 2028	Research and Consultation teams for various evidence bases.
Corporate Governance/ Policy	February 2027 – February 2028	Support in undertaking Equalities Impact Assessment



What is required	Timescales	Who will deliver (Teams and Job Titles)
Environmental Assessments (Strategic Environmental Assessment/ Habitats Regulations Assessment)	March 2026 – November 2028	Strategic Environmental Assessment (SEA) to be mainly undertaken in-house Need to appoint a consultant to undertake Habitats Regulations Assessment (HRA)
Local Housing Need Assessment	February 2026 – October 2026	Policy & Strategic Housing (& External Consultants)
GIS, Tech, & AI	March 2026 – May 2029 (Throughout process)	GIS & Planning Policy, Planning Tech Support and Administration
Liaison with the Planning Inspectorate to assess status in advance of Gateway 3	July 2028 – April 2029 (In advance of Gateway 3)	Programme Officer Working with Planning Admin
Legal	Review of plan content in advance of Gateways 2 and 3	Property, Planning and Environment
Transport, Urban Design, and Heritage, FCERM, Green Spaces, Commercial Operations, Investment and Development, Estates	Input into evidence formation throughout the production of the Plan	Relevant directorates and teams
Community Infrastructure Levy and Local Plan Viability	Input into evidence formation throughout the production of the Plan	Relevant directorates and teams

4.5 Identification of any additional skills requirements

The following technical evidence base/studies will be required to support the Local Plan and will require additional expert skills beyond those available within the Planning Policy Team and the wider Borough Council: Viability Assessment, Transport Modelling, Strategic Flood Risk Assessment, Habitats Regulations Assessment and Strategic Environmental Assessment. These will be procured through third-party specialist assessment.



5. Evidence

5.1 Key Evidence

Key Evidence	Area Covered (e.g. just LPA or broader)	In-house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
Duty to Co-operate (Statement of collaboration)	Norfolk County/ other adjacent local authority areas – Cambridgeshire/ Lincolnshire/ Suffolk	Internal	Statutory consultees, County Council; MMO; National Highways, Adjacent local authorities	Norfolk and Suffolk SDS will set strategic policies, but necessary to work with other adjacent authorities (Cambridgeshire; Lincolnshire)
Strategic Environmental Assessment (SEA)	Borough area	Internal	Statutory consultees, plus County Council; MMO; National Highways; adjacent local authorities	Statutory requirement, underpinning entire Local Plan
Habitats Regulations Assessment (HRA)	Borough area	External	Statutory consultees (Natural England); Local Wildlife Trust; Norfolk and Suffolk Nature Recovery Partnership	Undertaken in parallel with SEA
Equalities Impact Assessment	Borough area	Internal	Corporate Policy	
Local Housing Needs Assessment	Defined housing market area	External	Strategic Housing team	Inform housing mix/ needs/ tenure policies



Key Evidence	Area Covered (e.g. just LPA or broader)	In-house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
Housing and Employment Land Availability Assessment (HELAA)	BCKLWN	Internal	Statutory consultees; County Council; National Highways; Developers; housebuilders; land agents/ promoters	Database/ long-list of potential development land allocations
Employment Land Review / Economic Study	Norfolk County/ other adjacent local authority areas – Cambridgeshire/ Suffolk	External consultant & in-house	Regen/ Economic Development teams; County Council(s)	Inform economic (employment/ jobs) policies
Housing Land Supply Evidence	BCKLWN	Internal	Statutory consultees, Developers; housebuilders; land agents/ promoters	Housing trajectory; informing site selection process/ site allocations policies
Strategic Flood Risk Assessment (SFRA) Level 1 & Level 2	BCKLWN	External consultant	Environment Protection team; Environment Agency; Natural England; LLFA; MMO; IDBs; Norfolk/ The Wash Coast Partnerships; Anglian Water	Necessary evidence base to underpin all site allocations
Green Infrastructure Study	BCKLWN	External Consultant	Conservation/ Environmental Protection/ Regen/ Economic Development teams; Natural England; Local Wildlife Trust; Norfolk/ The Wash Coast Partnerships;	Linked to Local Nature Recovery Strategy, setting out how this can be implemented through the Local Plan



Key Evidence	Area Covered (e.g. just LPA or broader)	In-house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
			Norfolk/ Suffolk NRP	
Renewable Energy Capacity and Potential Study	BCKLWN	External consultant	Climate Change team; Historic England; Norfolk / The Wash Coast Partnerships National Grid; energy companies;	Inform spatial policies – site allocations for renewable energy allocations/ suitable areas for renewable energy generation
Transport Assessment	Norfolk County and Adjacent local Authority areas.	External consultant (led by NCC)	NCC; National Highways; Network Rail / GBR; train operators; A47 Alliance	Inform site allocations; setting transport policies
Site (Selection) Assessment / Sustainability Appraisal (SA)	BCKLWN	Internal	Statutory consultees; County Council; National Highways; Developers; housebuilders; land agents/ promoters	Providing the “bridge” between HELAA and Local Plan site allocations (shortlisting/ site selection)
Infrastructure Delivery Plan	Norfolk County/ other adjacent local authority areas – Cambridgeshire/ Suffolk	Internal	Statutory consultees, plus County Council; MMO; National Highways; adjacent local authorities	Housing trajectory; informing site selection process/ site allocations policies
Sports and Open Space Audit	BCKLWN	External consultant	Including in-house resources; e.g. Parks team	N/A
Whole Plan Viability Report	BCKLWN	External consultant	Statutory consultees, Developers; housebuilders; land agents/ promoters	Underpins entire Local Plan



Key Evidence	Area Covered (e.g. just LPA or broader)	In-house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
Gypsy and Traveller and Travelling Show People Assessment update	Norfolk County/ other adjacent local authority areas – Cambridgeshire/ Suffolk	External consultant	Strategic Housing/ Environmental Protection teams; Statutory consultees; County Council; G&T Liaison Groups; landowners/ agents	Inform G&T policies and site allocations (where needed to meet defined need)
Economic Study, New Settlement Study, Housing Capacity Study, NSPF (Norfolk Strategic Planning Framework) update	Norfolk Wide studies	Combination of Internal and External	Norfolk Planning Authorities	N/A



6. Stakeholder Engagement

6.1 Engagement Approach. The engagement approach sets out how we will involve communities, stakeholders, Councillors and statutory bodies throughout plan preparation. We will aim to complete meaningful and proportionate engagement, making it clear which areas people can influence at each stage of plan making. There will be a clear distinction between policy choices and non-negotiables (law/policy).

6.2 Engagement will take place at each plan-making stage as set out below. In line with government recommendations, engagement will make the best possible use of digital tools but will not be digital only.

6.3 Scoping and early participation / Getting Ready. Engagement purpose: Views on the scope of the plan, approach to engagement and views on the key issues, challenges and opportunities to inform the vision. Length: Six weeks

6.4 Vision and strategy development. Engagement purpose: Views on content, evidence, spatial strategy and draft policies. Length: Six weeks

6.5 Draft plan preparation. Engagement purpose: Views on content, evidence, spatial strategy and draft policies. Length: Eight weeks

Who	Method	Details
Specific Consultation Bodies	Formally notified of consultation stages via email and regular scheduled meetings with key relevant bodies.	Engage early and at each formal consultation stage to obtain technical advice, identify strategic and cross-boundary issues, and confirm infrastructure, environmental and regulatory requirements. Responses and agreed actions will be recorded through consultation statements and statements of common ground where appropriate.
Communities and the Public	Database notified by email; online surveys Digital Maps Community events Social media engagement	Provide accessible digital and written opportunities to comment at each consultation stage, including online surveys and mapping, in-person events and targeted outreach. Publicise these opportunities through the Council's website, email updates, local media and social media, and publish feedback summaries explaining how views have informed the plan.
Other Stakeholders	Database notified by email	Include community organisations, businesses, infrastructure providers, landowners, developers, agents and groups with an expressed interest in the Local Plan. Invite comments at relevant stages and use targeted meetings or workshops where specialist or place-specific input is required.
Councillors	Local Plan Task Group	Provide regular updates through the Local Plan Task Group, with focused workshops at key stages on the vision, strategic objectives, spatial options and draft policies. Equip members with clear materials to support local conversations and provide routes for issues to be raised before formal decisions.



6.6 Who will be engaged.

Specific consultation bodies

- Active Travel England
 - Electronic communications operators
 - Canal & River Trust
 - Civil Aviation Authority
 - Sport England
 - National Highways
 - Environment Agency
 - Forestry Commission
 - Norfolk County Council (including Highways, Lead Local Flood Authority, Education, Public Health, Local Policing Body)
 - Historic England
 - Homes England
 - Norfolk and Suffolk Nature Recovery Strategy Partnership
 - Norfolk Coast Partnership
 - NHS Integrated care boards
 - Utilities providers – electricity, gas, water, sewerage
 - Transport East
 - Marine Management Organisation
 - Natural England
 - Neighbouring local authorities (County and District/ Borough Councils)
 - Neighbouring combined authorities
 - Town/ Parish Councils
 - Network Rail Infrastructure Limited
 - Office of Rail and Road
-
- **Councillors**
 - **Communities and the public**
-
- Residents and community groups
 - Parish and town councils
 - Hard to reach groups
 - Agents, developers and landowners
 - Third parties that have expressed an interest in the Local Plan

Regulation 2 of the Town and Country Planning Regulations 2026 has been reviewed and cross-referenced to ensure all relevant consultation bodies are included in engagement as part of the Plan-making process. [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2026](#).

Further information on our approach to engagement is outlined in our Consultation and Engagement Strategy for the Local Plan.



7. Budget Overview

7.1 Cost Estimates:

The majority of the costs associated with the production of a new Local Plan will be related to staff time and the procurement of specialist evidence. Other costs to be taken into consideration relate primarily to the consultation process (e.g. specialist software, printing, hiring of premises for consultation events) and for the formal examination process (e.g. employing a programme officer, planning inspector fees, legal support).

Evidence Base Local Plan Costs					
Theme	2026/27	2027/28	2028/29	Unallocated	Total
Engagement, design & placemaking	£203.0k	£5.0k	£2.0k	£0.0k	£210.0k
Environment & infrastructure evidence	£330.0k	£145.0k	£5.0k	£0.0k	£480.0k
Housing & economic evidence	£100.0k	£0.0k	£0.0k	£0.0k	£100.0k
Plan delivery, viability & examination	£30.0k	£85.0k	£250.0k	£0.0k	£365.0k
Total core provision	£663.0k	£235.0k	£257.0k	£0.0k	£1,155.0k
<i>Costs are grouped into broad themes to provide transparency while protecting procurement sensitive study level estimates.</i>					

Estimated Local Plan Costs					
Item	Costs per financial year, £000s				
	2026/27	2027/28	2028/29	Unallocated	Total
Planned expenditure	£663.0	£235.0	£257.0		£1,155.0
Unallocated provision				–	–
Total core provision	£663.0	£235.0	£257.0	–	£1,155.0
<i>Costs are not inclusive of Business as usual activities including staff salaries, existing service level agreements, costs accrued through meeting regulatory duties such as neighbourhood planning etc. This will be met through existing Planning Policy Budget.</i>					

7.2 Budget Reviews:

Budget reviews will be overseen by the Policy Team in collaboration with the Finance Team, with the Project Manager responsible for initiating and documenting any proposed changes. Reviews will be triggered by significant shifts in project scope, such as the need for additional evidence studies or unforeseen resource requirements. All adjustments will be formally approved through meetings and recorded.

To mitigate key risks, strategies will include securing contingency funding, grant funding where available, adjusting delivery timelines where necessary and possible, and maintaining clear communication channels with stakeholders so that potential impacts are identified early and managed effectively. This process ensures that budget changes are controlled, efficient, and minimise disruption to the Local Plan's preparation.



8. Risks and Mitigation

8.1 Summary of Key Risks Identified:

Risk Scoring Assumptions

Likelihood (L) – 1) Very Unlikely, 2) Unlikely, 3) Possible, 4) Likely, 5) Almost Certain

Impact (I) – 1) Negligible, 2) Minor, 3) Moderate, 4) Major, 5) Critical

Risk Rating – RAG Status for consideration, Red (15-25), Amber (5-12), Green (1-4)

Risk	Likelihood – high, medium, low	Risk level – high, medium and low	Risk Rating	Mitigation
Strategic and Political Risks				
Failure to secure early political agreement on spatial strategy	3	5	15 (Red)	Early member engagement, workshops to build understanding and secure political consensus before formal stage, maintain clear evidence trail – Local Plan Task Group
Changes in political leadership or priorities during plan preparation	3	5	15 (Red)	Maintain cross-party member engagement, ensure decisions are evidence-led and embedded through the formal governance process.
Pressure to introduce late policy changes outside agreed scope	3	4	12 (Medium)	Use formal change control, assess implications on timetable, evidence and legal compliance before accepting changes
Planning Reforms / Changes to national planning policy	4	5	20 (High)	Maintain horizon scanning and monitor government announcements, build flex into project programme and review policy implications promptly
Programme, Timeline and Governance Risks				
Slippage against the 30-month timeline	4	5	20 (High)	Maintain detailed project plan, milestone monitoring, regular reporting and early escalation of any delays. Identify and communicate critical path activities and workstreams.
Local Government Reorganisation (LGR)	3	5	15 (High)	Monitor government proposals, assess implications for governance and plan-making arrangements, maintain contingency planning.



Risk	Likelihood – high, medium, low	Risk level – high, medium and low	Risk Rating	Mitigation
Devolution and wider Rewiring the State proposals create uncertainty over future governance, responsibilities and decision making arrangements	3	4	12 (Medium)	Monitor emerging arrangements, engage with relevant authorities and ensure flex within the programme. Engage with relevant neighbouring and strategic authorities to maintain continuity of plan preparation.
Insufficient consultation engagement	3	4	12 (Medium)	Develop a comprehensive consultation and engagement strategy, use varied engagement methods and target hard-to-reach groups
Evidence Base Gaps	3	5	15 (High)	Maintain evidence requirements tracker, commission studies early and undertake regular reviews of completion.
Unclear decision-making routes	3	4	12 (Medium)	Establish Governance Structure, roles and responsibilities as outlined through this PID including escalation and approval routes to also cover ITAO (In the absence of)
Gateway submissions rejected or paused by PINS	2	5	10 (Medium)	Engage with PINS early, undertake compliance checks, peer review documentation and ensure legal and procedural requirements are prioritised.
Delays to procurement or completion of evidence base	4	4	16 (Medium)	Develop procurement timetable early, identify critical evidence requirements whilst maintaining strong communication channels and contingency options.
Evidence or viability fails to align and/or undermines deliverability	3	5	15 (Medium)	Ensure evidence and viability assessments reflect the objectives and undertake regular reviews of the evidence results.
Housing / Growth Risks				
Housing requirements politically and/or publicly contested	4	5	20 (High)	Maintain clear evidence base, communicate housing needs requirement transparently and engage members and communities early.
Cross-boundary issues / failure to align housing and transport issues	3	5	15 (High)	Maintain regular engagement with neighbouring authorities in line with the Statement of Common Ground. Record agreements and unresolved issues.



Risk	Likelihood – high, medium, low	Risk level – high, medium and low	Risk Rating	Mitigation
Potential delay of delivery of strategic sites allocated in the current plan, that are being sought to be re-allocated in the emerging Local Plan.	5	5	25 (High)	The Borough Council will continue to actively pursue development of such sites working with relevant stakeholders
Legal Risks				
Ambiguous / inconsistent policy wording or NPPF alignment	3	5	15 (High)	Undertake policy reviews, legal soundness checks and internal / external review before publication
Legal challenge / Judicial review following adoption	3	5	15 (High)	Ensure legal compliance throughout preparation, maintain a robust evidence base and undertake legal review at key stages ensuring statutory process is followed correctly.
Engagement Risks				
Consultation fatigue or low engagement	3	3	9 (Medium)	Use targeted engagement, avoid any unnecessary consultations and clearly explain the purpose, providing accessible material.
Misinformation or opposition undermines confidence	4	4	16 (High)	Develop a clear communication strategy, publish evidence behind decisions, respond quickly to misinformation and maintain transparency.
Resources and Capacity Risk				
Staffing Capacity & Turnover	4	4	16 (High)	Maintain resource planning, document key processes, cross-train across the team and identify support requirements early in the timeline.
Insufficient funding / resources to deliver the local plan programme	3	5	15 (High)	Maintain budget monitoring, identify resource pressures early and secure approvals for additional funding where required.



9. Approval of this PID

Author Name:	Title	Date Approved (attach email confirmation)
Alex Fradley	Planning Policy Manager	26/10/2026
Approver Name:	Title	Date Approved
Cllr James Moriarty	Portfolio Holder	26/10/2026
Kate Blakemore	Chief Executive	24/10/2026
Stuart Ashworth	Assistant Director	23/10/2026

10. Version Control/ Change Log

Date of change (Specifying version)	Author	Reason	Updated Version Title

