Cabinet

Monday 7 December 2015

2.00 pm, Colman and Cavell Rooms
South Norfolk House, Long Stratton, Norfolk, NR15 2XE

If you have any special requirements in order to attend this meeting, please let us know in advance

Large print version can be made available

Contact Claire White on 01508 533669 or democracy@s-norfolk.gov.uk
Members of the Cabinet

Mr J Fuller (Chairman)
Mr J Wilby (Vice Chairman)

Portfolio Holders

Mrs Y Bendle
Mr M Edney
Mr L Hornby
Mrs K Mason Billig

Group Meetings

Conservatives – 1.00 pm Cabinet Office Liberal
Democrats – 1.30 pm, Kett Room

This meeting may be filmed, recorded or photographed by the public; however anyone who wishes to do so must inform the chairman and ensure it is done in a non-disruptive and public manner. Please review the Council’s guidance on filming and recording meetings available in the meeting room.
Agenda

1. To report apologies for absence;

2. Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency;

3. To Receive Declarations of Interest from Members; (please see guidance – page 6)

4. To confirm the minutes of the Cabinet meeting held on 2 November 2015; (attached – page 7)

5. Corporate Plan 2016 - 2020 (report to follow)
6. South Norfolk Housing Strategy 2016-19; (report attached – page 18)

7. Greater Norwich Homelessness Strategy; (report attached – page 77)

8. Community Infrastructure Levy (CIL). Exemptions for residential Extensions and Instalment Policy; (report attached – page 127)

9. Council Tax Support Scheme 2016/17; (report attached- page 134)
   (NOTE: Appendix 2 is not attached but is available to view on-line at http://www.south-norfolk.gov.uk/democracy/default.aspx)

10. Statement of Licensing Policy; (report attached- page 150)

11. Statement of Gambling Policy; (report attached- page 180)

12. Norfolk County Council - Reimagining Norfolk Consultation; (report to follow)
14. Exclusion of the Public and Press

To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

15. Leisure Pricing, Refund and Cancellation Review and Proposals for Future Delivery

(report enclosed separately for members)

(NOT FOR PUBLICATION by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972)
DECLARATIONS OF INTEREST AT MEETINGS

Members are asked to declare any interests they have in the meeting. Members are required to identify the nature of the interest and the agenda item to which it relates.

- In the case of other interests, the member may speak and vote on the matter.
- If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed.
- If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting.
- Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.
- In any case, members have the right to remove themselves from the meeting or the voting if they consider, in the circumstances, it is appropriate to do so.

Should Members have any concerns relating to interests they have, they are encouraged to contact the Monitoring Officer (or Deputy) or another member of the Democratic Services Team in advance of the meeting.
CABINET

Minutes of a meeting of the Cabinet of South Norfolk District Council held at South Norfolk House, Long Stratton on Monday 2 November 2015 at 9.00 am

Members Present:

Cabinet: Councillors J Fuller (Chairman)
M Wilby, Y Bendle, M Edney and L Hornby

Apologies: Councillor K Mason Billig

Non-Appointed: Councillors V Bell, D Bills, S Blundell, P Broome, C Easton, C Foulger, D Fulcher, D Goldson, M Gray, J Hornby, N Legg, T Lewis, J Mooney, L Neal, J Overton, T Palmer, J Savage, R Savage, A Thomas, G Wheatley and J Wilby

Officers in Attendance: The Chief Executive (S Dinneen), the Director of Business Improvement (D Lorimer), the Director of Community Services (P Boyce), the Director of Growth and Localism (T Horspole), the Accountancy Manager (M Fernandez-Graham), the Communities and Democratic Services Manager (L Mickleborough), the ICT Operations Manager (M Sage), the IT Service Support Manager (A Quinton), the Planning Policy Manager (A Nicholls), the Project Manager (A Mewes) and the Planning Officer (T Barker)

2400 DECLARATIONS OF INTEREST

The following member declared an other interest in the matter listed below:

<table>
<thead>
<tr>
<th>Minute Number</th>
<th>Councillor</th>
<th>Nature of Interest</th>
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<tbody>
<tr>
<td>2403</td>
<td>Cllr M Gray</td>
<td>Member of the Broads Authority</td>
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</table>
2401 MINUTES

The minutes of the meetings held on Monday 14 September and 19 October 2015 were agreed as correct records and signed by the Chairman.

2402 MULBARTON NEIGHBOURHOOD PLAN; CONSIDERATION OF THE EXAMINER’S REPORT

The Subject of the Decision

Members considered the report of the Planning Policy Manager, which suggested that the Examiner’s recommended modifications to the Mulbarton Neighbourhood Development Plan (NDP) be accepted, allowing the Plan to proceed to referendum, to take place on 10 December 2015.

The Planning Officer presented the report to members, explaining that some of the modifications recommended by the Examiner, were issues that had been identified by South Norfolk Council back in February.

The Chairman welcomed Cllr J Joyce, a parish councillor in Mulbarton and the Chairman of the Mulbarton Neighbourhood Plan Committee, to the meeting. Cllr Joyce explained that the residents of Mulbarton accepted the need for development, but hoped that the scale of development could be restricted to maintain a “village feel” and did not support development to the south of the village. He was satisfied that the Examiner’s modifications did not alter the main character or aspirations of the Plan and was keen to proceed to the public referendum. Cllr Joyce expressed his gratitude to officers at South Norfolk Council for their support throughout the process.

Cllr N Legg, local member for Mulbarton, felt the Examiner’s report to be fair, and he recognised the need to make modifications to ensure that the Plan met the Basic Conditions. Cllr C Foulger, also local member, echoed these comments.

The Chairman congratulated Mulbaton Parish Council, and the Neighbourhood Plan Committee for its achievements, it being only the second parish in the District to develop a Neighbourhood Plan.
The Decision

RESOLVED To:

1. Accept the Examiner’s report into the Mulbarton Neighbourhood Plan, and the recommended modifications contained within it necessary to pass the Basic Conditions tests; and
2. Delegate to the Director of Growth and Localism the authority to make the modifications (including consequent supporting text changes) and to progress the (modified) Mulbarton Neighbourhood Plan to a public referendum, to take place on 10 December 2015.

The Reasons for the Decision

To ensure planned and co-ordinated development in Mulbarton, allowing residents to be involved in shaping communities, and for the document to proceed to referendum.

Other Options Considered

None

2403 GREATER NORWICH LOCAL PLAN, CENTRAL NORFOLK STRATEGIC HOUSING MARKET ASSESSMENT AND GREATER NORWICH WATER EFFICIENCY ADVICE NOTE UPDATE

The Subject of the Decision

Members considered the report of the Planning Policy Manager, which updated Cabinet on a number of strategic and planning policy issues, and sought Cabinet's agreement on various courses of action for future policy development.

The Planning Policy Manager outlined the key issues of his report, drawing attention to the areas requiring Cabinet approval.

Referring to the recommendation of the report concerning the Strategic Housing Market Assessment (SHMA), members noted that the SHMA also covered the Broads Authority area, and had been omitted in error from the recommendations of the report. Cllr M Gray drew attention to the proposals to work jointly with the other Greater Norwich Local Authorities, to review their current and emerging Local Plan documents through the preparation of a single Greater Norwich Local Plan, covering strategic policies and
site specific allocations, noting that South Norfolk Council would prepare a separate Development Management Policies Document. He expressed concern at this approach, stressing the need for a common methodology when assessing sites.

The Chairman felt that Cllr Gray had made some valid points, but he explained that the purpose of the report was to confirm a commitment to working jointly with the other authorities, and that such details would be discussed at a later stage.

Discussion followed with regard to the process for sites coming forward for development and site allocations. Officers explained that all options / proposals would be considered, after the required growth for the area had been calculated. With regard to governance arrangements, the Director of Growth and Localism explained that there had been some debate at a recent meeting of the Greater Norwich Growth Board (GNGB), concerning the creation of a similar body to that of the former Greater Norwich Development Partnership (GNDP). The Chief Executive reminded members that such detailed issues would form the part of future reports to Cabinet.

The Decision

RESOLVED: To:

1. Agree that South Norfolk Council should work jointly with the other Greater Norwich local authorities (Broadland and Norwich, working with Norfolk County Council) to review their current and emerging Local Plan documents through the preparation of a single Greater Norwich Local Plan covering strategic policies and site specific allocations, with South Norfolk Council preparing a separate Development Management Policies document;

2. Note the progress to date on the Norfolk Strategic Framework, and approve the contents of the draft Strategic Housing Market Assessment covering the Broads Authority, Breckland, Broadland, North Norfolk, Norwich and South Norfolk, and to delegate to the Director of Growth and Localism, in consultation with the Cabinet Member for External Affairs, authority to agree the final version of the SHMA (in co-operation with the other four local planning authorities) which can be then be used as evidence for planning purposes;


The Reasons for the Decision
To make the most of potential cost savings by working jointly, comply with the duty to cooperate and to adhere to national policy.

Other Options Considered
None

2404 PERFORMANCE, RISKS, AND REVENUE BUDGET PROVISION REPORT FOR QUARTER 2 2015/16

The Subject of the Decision

Members considered the report of the Project Manager, the Accountancy Manager and the Scrutiny and Information Rights Officer, which detailed the Council’s performance against strategic measures, risk position, and the revenue budget position at the end of the second quarter for 2015/16.

Cllr M Edney was pleased to report that quarter 2 performance had generally been positive, with 25 measures meeting or exceeding target (green status), two indicators within an acceptable tolerance of target (amber status), and one measure not reaching the stretched target (red status). He referred to recent successes such as the “Waste Minimisation” Award, the re-opening of the Wymondham swimming pool, and the high performance of CNC Building Control. With regard to BV012, the number of working days lost to sickness, Cllr Edney was disappointed that this figure was not on target, but he suggested that this was a difficult indicator to influence, due to serious long term illness of some staff. Members also noted that sickness levels were in fact lower than they were two years previous.

With reference to NI 181, the number of days taken to process Housing Benefit/Council Tax Benefit claims (currently allocated a red status), Cllr Y Bendle explained that there was always a dip in performance at quarter 2 for this indicator, and that she had every confidence that the year would end on target. There had been an increase in demand in Quarter 1 which had led to a backlog of claims, but the team had worked hard and the backlog had reduced significantly. Members noted that the current performance of 15 days was still considerably higher than the national average which stood at 22.

Referring to targets, the Chief Executive explained that these were examined as part of the Business Planning Process, and that members would have an opportunity to be involved in shaping future performance measures, ensuring that they were meaningful, with appropriate targets in place. She hoped that this work would identify where targets needed to allow for seasonal dips in performance, such as that described for NI 181 (the processing of Housing/Council Tax claims).
The Project Manager drew attention to areas that had shown exceptionally high performance, referring in particular to LI 323, the number of vulnerable people helped to maintain independence in their own homes, MI 1038, the % of major planning applications processed within agreed timescales and MI 1039 the % of business units liable for business rates occupied. Cabinet members made reference to other areas of good performance, including the number of empty homes that were back in use, the Member Grants budget, recycling rates and the number of affordable homes delivered. Members noted that although the Council was performing well in relation to the affordable homes target, the Government was changing the definition of affordable homes, and as a result the Council would need to change the way it calculated this indicator.

During discussion, Cllr M Gray queried the figures for MI 1037, the % of householder applications received within 6 weeks and 1038, the % of major planning applications processed within agreed timescales, and whether the figures reported were cumulative, or referred to the second quarter alone. The Project Officer agreed to examine the figures in more detail and to respond to Cllr Gray after the meeting.

Turning to risks, the Communities and Democratic Services Manager reported that at present, all risk factors were positive, indicating that risks were being proactively managed, with opportunities being realised as they were identified. Referring to strategic risks, she gave mention to the recent adoption of the Local Plan, the successful re-opening of part of the Wymondham Leisure Centre, the development at Poringland and the plans to use Wymondham Leisure Centre and the Ketteringham Depot to store data remotely. Cllr Fuller made reference to the risks associated to the future of the New Homes Bonus, and the plans for devolution. He hoped that the situation would be much clearer following announcements in the Autumn Statement in November.

Referring to the revenue position for quarter 2, the Accountancy Manager explained that there was a positive variance of £1.1 million to the end of the quarter, with positive variances across all directorates. The positive variances across pay and non-pay budgets, were greater than last year to date, and there was a positive forecast outturn to the end of the year of £1.7 million.

Members’ attention was drawn to Appendix 4 of the report (exempt papers) regarding the recommendations from the Finance Regulation, Accounts and Governance Committee, concerning Opting Tax on Commercial Properties and after brief discussion, members confirmed their agreement with these recommendations.

Cabinet was pleased to note the positive revenue position, however, members were mindful of the fact that it was only quarter 2, and that some relevant costs were yet to be taken in to account.

The Decision
RESOLVED: To:

1. Note the 2015/16 performance for the second quarter and the combined efforts across the Directorates to deliver the Vision of the Council;
2. Note the current position with regard to risks and to accept the actions to support risk mitigation;
3. Note the revenue position and the reason for the variances on the General Fund.
4. Agree the recommendations from the Finance, Resources, Audit and Governance Committee as outlined in Appendix 4 of the report.

The Reasons for the Decision

To ensure that process are in place to improve performance, that the management of risks is sound, and to ensure that reserves and revenue budgets are in place to meet the Council’s corporate objectives.

Other Options Considered

None.

2405 CAPITAL AND TREASURY MANAGEMENT REPORT QUARTER 2 2015/16

The Subject of the Decision

Members considered the report of the Accountancy Manager, which detailed the position on the Council’s capital programme for quarter 2 of the financial year, the treasury management activity during the quarter, and the performance against the prudential indicators required under the Treasury Management Code of Practice.

The Accountancy Manager outlined the key issues of his report, explaining that capital expenditure was £4.8 million for quarter 2, against a profiled budget of £6.4 million. Members noted that the positive variance against budget was partly due to the later than anticipated payments to the contractor for the property development in Poringland.

Turning to Treasury Management, the Accountancy Manager explained that there had been a temporary breach of the upper limit of £25 million for exposure to variable interest rates investment from 16 July to 21 July, 17 to 18 August and 16 to 20 September. Cllr M Edney expressed his support for the proposal to increase the upper limit for this prudential indicator to £30 million.

With regard to the joint insurance tender for services to the Council, North Norfolk and Great Yarmouth Councils, members noted that to ensure the best value for money, this had been awarded to five different insurers, splitting the business in to five different categories. In response to a query from Cllr T Lewis, he explained that business interruption referred to under the cover provided...
from Zurich Municipal Insurance, related to engineering type failures. Personal Accident and Business Travel to be provided by ACE European Group, related to employees of the Council. The Accountancy Manager confirmed that separate insurance arrangements had been made for Build Insight.

Summing up, Cllr Fuller referred to solid performance, but stressed the need to remain cautious with regard to positive variances, due to hidden and delayed costs.

The Decision

RESOLVED:

1. To:
   a) Agree to the request to re-programme £40,000 of the budget for capital grants for neighbourhood projects into 2016/17, as outlined in paragraph 2.3 of the report;
   b) Approve the request to re-programme the entire £302,624 budget for low cost housing into 2016/17, as outlined in paragraph 2.5 of the report;
   c) Approve the request to bring forward £50,000 from the 2016/17 programme for the Long Stratton Leisure Centre project as outlined in paragraph 2.11 of the report;
   d) Note the decision to award contracts for insurance services as outlined in paragraphs 8 and 9.

2. TO RECOMMEND THAT COUNCIL:
   a) Approves the 2015/16 prudential indicators for the quarter and note the breaches of one indicator.
   b) Increases the prudential indicator for the upper limit on exposure to variable rate investments to £30 million.
   c) Notes the treasury activity in quarter two and that it complies with the agreed strategy.

The Reasons for the Decision
To ensure that the capital programme is on target and is aligned to the Council's priorities. To ensure a balanced portfolio in terms of risk, rates and liquidity.

Other Options Considered

None.

2406 ICT STRATEGY (INCLUDING DRAFT CAPITAL PROFILE)

The Subject of the Decision

Members considered the report of the ICT Operations Manager, which sought Cabinet approval for a revised ICT Strategy.

The ICT Operations Manager outlined the salient points of his report to members, referring in particular to the key principles and strategic themes, which underpinned the revised Strategy. He drew attention to the main risks and considerations associated with the proposals.

The ICT Operations Manager responded to a number of minor queries and provided clarification with regard to a number of acronyms. In response to a query regarding members' IT, he explained that the Council was looking to move away from the Good Platform, to Office 365, for both staff and members. He confirmed that existing devices would be compatible with the Office 365 solution.

Cllr J Fuller expressed his concern that the Strategy made no links to the Council’s website, and after some debate, members agreed that appropriate links should be made to the Digital Engagement Strategy (to be considered at a future meeting of the Cabinet).

Turning to the exempt paper, Appendix B of the report which outlined the draft capital profile, it was

RESOLVED: that under Section 100A (4) of the Local Government Act 1972, the public and press be excluded from the meeting on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 Schedule 12A of the Act (as amended).

Member discussed the draft capital profile, and the ICT Operations Manager responded to queries on points of detail. With regard to one of the capital requirements, the Chief Executive assured members that officers were taking a hard line and were negotiating with the relevant parties in a co-ordinated and cohesive way, to ensure best value for the Council.
(It was then **AGREED** that the public and press could be readmitted to the meeting)

**The Decision**

**RESOLVED:** To:

1. Approve the revised ICT Strategy as outlined at Appendix A of the report, subject to appropriate cross referencing to the Digital Engagement Strategy, with final approval to be delegated to the Chief Executive in consultation with the Cabinet member for Finance and Resources;

2. Note the draft capital spend as detailed in Appendix B of the report.

**The Reasons for the Decision**

To ensure a more efficient and effective IT service

**Other Options Considered**

None

2407 **ENVIRONMENTAL POLICY**

Members noted that the Environment Policy was deferred to a future meeting of the Cabinet.

2408 **CABINET CORE AGENDA**

Members noted the latest version of the Cabinet Core Agenda.
(The meeting concluded at 10.39 am)

______________________________
Chairman

Cab Min 02/11/15CLW
South Norfolk Housing Strategy 2016-19

Report of the Housing and Public Health Partnerships officer
Cabinet Member: Councillor Yvonne Bendle

CONTACT
Liam Pickering
lpickering@s-norfolk.gov.uk
1. Introduction

1.1. This report presents to Cabinet the Housing Strategy (Appendix A) and its Action Plan (Appendix B) which will provide the basis for supporting housing activity in South Norfolk until 2019. The Strategy has been subject to a twelve week consultation period and feedback received. The response to consultation is also attached (Appendix C). The Strategy and Action Plan were considered by Members of the Housing, Wellbeing and Early Intervention Policy Committee on the 23rd November 2015 and their comments have been incorporated.

2. Context

2.1. The previous Housing and Public Health Policy Committee and the current Housing, Wellbeing and Early Intervention Policy Committee have overseen the evolution of a proposed Housing Strategy for South Norfolk. It builds on progress to date, and it sets out how the Council will continue to deliver improvements on an evolving innovative basis. When it is adopted the Strategy will provide the context for all housing activity in South Norfolk until 2019.

2.2. The document has been subject to a twelve week consultation period.

2.3. This report summarises the outcome of the consultation process and the resultant Housing Strategy and draft Action Plan.

2.4. The key stages in developing the Strategy to date have been:

- At a Workshop Policy Committee Members considered evidence and issues, and agreed on the key themes for the Strategy, including housing’s contribution to wider council activity.
- Policy Committee Members used a horizon scanning exercise to consider emerging issues for inclusion.
• Policy Committee supported the person-centred focus that is found throughout the Strategy, and agreed on stressing links with public health and early intervention.

• There was a consultation event with staff to identify how their activity contributes to achieving the Strategy’s outcomes and how any barriers might be overcome.

• Engagement with the Senior Leadership Team throughout the formulation of the Strategy has ensured conformity with the wider strategic direction of the Council.

• There was a consultation event with key stakeholders, obtaining their views on how the strategy might be delivered to the benefit of their customers.

2.5. The Strategy will contribute to the delivery of the proposed new corporate priorities:

• **Place, Communities and Environment:** Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages - this is central to the first Priority Outcome of the Strategy, which includes many ways in which life and the environment will be improved with a focus on building prosperous communities.

• **Health, Well-being and Early Help:** Proactively working with communities to provide help at the earliest opportunity and enhancing the health and wellbeing of our residents - this is also a Priority Outcome, and it includes improving the abilities of individuals to prosper and linking housing with good health and wellbeing.

• **Economic Growth, Productivity and Prosperity:** Providing the conditions to stimulate growth, productivity and prosperity sharing the benefits of growth with our communities - this underpins the approach of the Strategy as it recognises housing as a key factor in individuals and communities ability to be productive and prosper.
3. Current Position

3.1. The Housing Strategy incorporating Member, external stakeholder and other consultation views is attached at Appendix A. The Strategy is for the Council, our partners and our communities and adopts a four-outcome approach to housing:

- **Providing it:** a good supply of housing within South Norfolk which meets need, supports growth and can be afforded at all income levels.
- **Accessing it:** residents have access to a home that meets their requirements, and that they can pay for and maintain.
- **Living in it:** residents live in warm, decent and safe homes within a resilient community, and receive support to help them achieve independent living in their own home.
- **Prospering in it:** Residents receive easily accessible advice and support which improves the life chances of them and their families, which targets those needing early interventions and support to get the most out of life.

3.2. The document itself is succinct and sets out how housing activity contributes to the Council’s wider aims, whoever is delivering it. As a result of consultation, the aims and outcomes contained in the Strategy have been developed into an outcome-focused detailed Action Plan (Appendix B).
4. Feedback from Consultation

4.1 The consultation process set out to evaluate the suitability of the draft Housing Strategy with key partners, establish any potential barriers to implementation of the proposed Strategy and identify actions for delivery of the Strategy to be incorporated into an Action Plan for implementation.

4.2 As a reminder the consultation process ran from 3rd August 2015 to 23rd October 2015 with two consultation events taking place on 8th and 22nd September 2015 for stakeholders and partners. A survey for feedback was available online and in hard copy for postal return and was also sent to several key stakeholders and all parish councils. The consultation was advertised via social media, website, internal and external communications and via partner agencies and included posters and flyers within SNC buildings and partner services. Discussions also took place at events and forums including the South Norfolk Older Peoples Forum.

4.3 During the twelve week period the Council received the following:

- 58 full responses to surveys (51 online, 7 by post/email)
- 38 individuals and representatives from key partners at the two consultation events
- Responses via letter from Parish Councils
- Discussion and verbal feedback from the Older People’s Forum
4.4 Full details of the feedback gained and our response to it is set out in the Response to Consultation document in Appendix C. A summary of the comments and modifications to the Draft Strategy is shown below:

<table>
<thead>
<tr>
<th>Issues Raised</th>
<th>Changes made to the Housing Strategy</th>
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<tbody>
<tr>
<td>Providing it</td>
<td></td>
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<tr>
<td>Clarity was needed on the various groups mentioned within the Strategy in relation to housing need.</td>
<td>We have amended the Strategy to refer more clearly to the needs of various groups of people, including those with special needs and local people.</td>
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<tr>
<td>Accessing it</td>
<td></td>
</tr>
<tr>
<td>The ‘Accessing it’ section did not previously include issues around homelessness.</td>
<td>We have made homelessness an aspect of ‘Accessing it’ – previously it was only in ‘prospering in it’. The Action Plan also reflects this.</td>
</tr>
<tr>
<td>The ‘Accessing it’ section needed further detail around helping people access a home.</td>
<td>The Housing Strategy has been amended to highlight the importance of obtaining a home in which to live and prosper. The Strategy and the Action Plan have been amended to emphasise this in relation to access to all tenures.</td>
</tr>
<tr>
<td>Living it in</td>
<td></td>
</tr>
<tr>
<td>The importance of partnership working and early interventions was raised</td>
<td>The “Living in it” section of the Strategy has been amended to emphasise the importance of Early Help.</td>
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<tr>
<td>Prospering in it</td>
<td></td>
</tr>
<tr>
<td>The ‘prospering in it’ section did not make reference to employment and training in allowing people to prosper.</td>
<td>The “Prospering in it” section of the Strategy has been amended to include the issue of employment and training and Action Plan updated accordingly.</td>
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The Strategy as a whole
The list of partners was not fully inclusive. Parish Councils and Early Help partners added to the list of partners within the Strategy.

The details of the national picture within the Strategy required update following Policy developments since the draft was written. The section of the Strategy relating to the wider national picture has been updated to include more detail in light of recent policy developments.

Current trends were not specific enough in the draft document. Current trends affecting social housing are now set out more clearly in the Strategy and the intention to keep the Council’s Home Options Service under review is in the Action Plan.

A number of respondents wanted further detail on the delivery aims identified in the strategy and a number also suggested action points. Each section of the Strategy has been expanded in detail throughout the Action Plan. Suggested actions raised by respondents have been included within the Action Plan.

5. Risks and Implications arising

5.1. Financial – no direct implications in creating the Strategy - the Council’s expenditure, decided within the annual budget-setting process, will provide the opportunity to fund in innovative ways while taking account of available resources.

5.2. Environmental – aspects such as improving the energy efficiency of homes and the quality of new homes will contribute to improving the environment of South Norfolk.

5.3. Equalities – the Strategy seeks to help people who are disadvantaged, thereby improving their opportunities.

5.4. Crime Reduction – early help through work with support agencies should reduce the amount of crime.
5.5. Risks – non-delivery or lack of progress in prioritised areas. Officers will ensure the Action Plan is kept under review and that adequate resources are prioritised to deliver key projects as well as business as usual for each focus area. The Action Plan itself is a ‘live’ operational document which will evolve as the Strategy progresses.

6. Other Options

6.1. In its present form the Strategy reflects Members’ substantial contribution to its evolution, and officers are confident that the approach adopted has provided a full opportunity for their input and that of key partners and residents. Nevertheless Members could decide not to approve the document at this time, instead opting for further development and the re-timetabling of adoption.

7. Conclusion

7.1. The Housing Strategy reflects the fact that the home is a central factor in determining residents’ ability to achieve their potential. It will therefore contribute to delivering the Council’s corporate priorities.

8. Recommendation

8.1. That Cabinet:

- Notes the responses received as part of the consultation process.
- Endorses the resultant Action Plan.
South Norfolk Housing Strategy 2016-19
The term “housing” means different things to different people. Let me say what it means to South Norfolk Council.

It is part of a much bigger picture. The Council wants young people and families to have the best start in life; it wants a district that is full of opportunity, be it jobs and training, health and wellbeing, or a strong environment and vibrant local community. It wants vulnerable people to be supported to make the most of life: where ambition is endemic; a strong sense of fairness for all throughout; and we want everyone to live with dignity and peace of mind. Housing makes a major contribution to all of this.

How are we going to achieve these ambitious plans?

Firstly, we want build on our excellent track record of ensuring the supply of homes in the district meets the needs of residents, and offers a choice in the type of home they access – be it affordable rent, shared ownership, outright purchase, private sector rent, Starter Homes, the Help to Buy scheme and so on. Our delivery in the last four years has been the strongest across Norfolk and Suffolk. But we aim to go further and faster, recognising that housing and the development of our district go hand in hand; local businesses want their employees to be decently housed, and the local economy benefits enormously from inward investment and economic growth generated by new housing.

Secondly, having supplied excellent levels of housing and choice, we want residents to be able to access them – which is not always easy. It’s not simply about accessing a home – it’s helping people ensure they have planned for all the costs associated with managing that home, they are able to manage their home properly and they can make a positive contribution to their community.

Thirdly, having accessed a home, we want the home to be warm, decent and safe for our residents. It mustn’t hold people back in life – a cold home may cause children to be off school, an accident-prone home increases the chances of older people going into hospital or more costly forms of care, and a home where the bills cannot be paid causes untold worry for the occupants which impacts on their wellbeing. We help customers achieve independent living in their own home: we want to go further with our partners, and to develop our role on dementia and treating older people with dignity.

Fourthly, we want people to prosper in their home, getting the most opportunities out of life. This Strategy is not about South Norfolk Council “doing to” local people. It’s about empowering people to take control of their own lives with the right support – when it’s needed. This is what Early Help is about for us – making sure that all the right support is available at the right time. Helping customers to help manage problems before they become unmanageable to prevent tough times; reducing the likelihood of someone becoming homeless, for example.

The aspirations set out in this Strategy cannot be delivered by the Council alone – and nor should they be. We have a raft of committed partners working with us who can, and need to play a massive part in getting the best results for local people. Of course, we don’t come into contact with all residents each year. But when we do, we will ensure that by working together we can remove confusion for customers, understand their needs better, and deliver better services for them. We are asking people who contact us to understand their part of the bargain: to take advantage of the opportunities on offer, to “own” their plans for the future, whilst continuing to recognise that sometimes you will need help to do this and that is why we are here.
INTRODUCTION

A person’s home is a central factor in determining whether or not they are able to achieve their potential in terms of health, wellbeing, education, employment, and participation in the community and society. All residents should have access to a safe home of a good standard which they can afford and are able to sustain, maintain and prosper in.

This is encapsulated in our vision:

To ensure all residents have access to and are able to maintain a good quality home that meets their needs and aspirations. The housing secured, and the support provided where appropriate, will assist local people in maximising their life opportunities. Residents will be ‘opportunity ready’ for housing, jobs, healthy lifestyles, independent living and their community.

This Strategy clarifies what we want, and how we plan to get there. Improving opportunities for the individuals and families is at the heart of what we are striving to achieve, and partners are fundamental in securing this. We will do this in a manner which is efficient and cost-effective; utilising our resources in a different way to maximise longer term outcomes for the customer, whilst minimising demand and cost on public organisations in the future.

The Strategy covers the period 2016-2019. It sets out how the Council and its partners will achieve its vision through four Priority Outcomes. It is accompanied by an Action Plan which will be reviewed on an annual basis. The plan will be used to identify the key actions which will deliver those Priority Outcomes. The involvement and support of our partners will be crucial in delivering this plan.

The Strategy has been subject to a 12 week consultation period between August and October 2015. This consultation sought the views key stakeholders and the public. A consultation survey was produced to allow the public and key stakeholders to feed into the development of the strategy by:

- establishing whether people agreed with the Priority Outcomes and key themes within the Strategy;
- gathering comments on each of the Priority Outcomes and the Strategy as a whole; and
- enabling people to suggest actions and measurements of success for the Strategy.

The consultation survey was available on the South Norfolk Council website and was publicised through partner agencies, social media, posters and marketing materials and sent directly to partner agencies. A hard copy for postal return and an email copy of the survey were also produced to widen participation. The survey was completed by a total of 58 respondents consisting of members of the public and representatives from key stakeholders. Letters and email responses were also received.

Two stakeholder consultation events took place in September to allow representatives from key stakeholders to feed into the strategy. These events were attended by representatives from partner agencies and from Parish Councils. The feedback gained from these events and from the survey is detailed in the Response to Consultation document and has been used to develop the final version of the Strategy and formulate the Action Plan.
WHY DO WE NEED A HOUSING STRATEGY, AND WHO IS IT FOR?

Ourselves

South Norfolk Council (SNC) has set out its corporate priorities and the housing role can be enhanced to make a fuller contribution to delivering on these.

We have already started to realise the benefits from embedding all our work within different approaches: around Early Interventions, Health and Wellbeing, Economic Development, and building Community Capacity.

We have a major opportunity to drive forward the work of SNC and its partners to get better outcomes for customers, whilst addressing innovatively the financial pressures on the public sector.

Our Partners

We already know the excellent contribution that our partners can make to address challenges within South Norfolk.

The role for partners is around strategic and operational partnerships. By working in collaboration, better outcomes for customers can be achieved.

We can make the most of opportunities that are available to us by working together and seeking imaginative ways of identifying funding solutions.

Our Communities

We want to make our services simple to access and provide support that really works. Our district is diverse and we will offer flexible services which reflect this and meet local requirements.

This Strategy is intended to help communities to help themselves: by making sure our customers know what we do, what they can expect from us and what is expected of them.
South Norfolk Council’s Vision
To retain and improve the quality of life and prosperity of South Norfolk for now and future generations to make it one of the best places to live and work in the country.

To ensure all residents have access to and are able to maintain a good quality home that meets their needs and aspirations. The housing secured, and the support provided where appropriate, will assist local people in maximising their life opportunities. Residents will be ‘opportunity ready’ for housing, jobs, healthy lifestyles, independent living and their community.

THE WIDER IMPACT OF HOUSING

<table>
<thead>
<tr>
<th>Place, Communities and Environment</th>
<th>Health, Well-being and Early Help</th>
<th>Economic Growth, Productivity and Prosperity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages</td>
<td>Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents</td>
<td>Providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities</td>
</tr>
</tbody>
</table>

Ensuring the range and number of local homes match the need of local families and residents.

- **How we will deliver this**
  - Deliver affordable housing that meets local need through our Affordable Housing Grants Scheme, our planning policy and our work with developers.
  - Maximise housing options for South Norfolk residents by identifying empty homes in the District and bringing them back into use.
  - Support the development of ‘self-builds’ by working with our Housing Association Partner, Saffron, to enable local people with the right skills to develop a home that meets their specific needs.

Moving Forward Together: The Council’s continuous improvement programme

<table>
<thead>
<tr>
<th>Local Plan</th>
<th>Early Help</th>
<th>SNC Economic Development Strategy</th>
<th>Wider determinants of health</th>
<th>Deliverer &amp; influencer of services e.g. housing, council tax /benefits, customer services environment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult Social Services</td>
<td>Children’s Social Services</td>
<td>Development Partners</td>
<td>Housing Providers</td>
<td>Employers</td>
</tr>
<tr>
<td>partners to provide housing</td>
<td>residents to access the housing</td>
<td>residents to live well in their home</td>
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</table>

Our Vision for housing

Our Corporate Priority Areas

Our Focus Areas

How we will deliver this

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Our Corporate Priority Areas

- Place, Communities and Environment
- Health, Well-being and Early Help
- Economic Growth, Productivity and Prosperity

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THE BIGGER PICTURE: WHAT WE KNOW ABOUT SOUTH NORFOLK

Our Communities

South Norfolk is a predominantly rural district, with 78% of the area officially designated as ‘rural’. There are a small number of market towns, over 100 villages and some northern parts of the area fall into the suburban parts of Norwich – the closest city.

South Norfolk is projected to be the fastest-growing local authority area in the County, with the population increasing by around 13,100 between 2011 and 2021. South Norfolk does not have a high population density at 1.39 persons per hectare, compared to the average for England at 4.11.

48.8% of the South Norfolk population is male, 51.2% is female.

The population in South Norfolk is older than average. The number of residents aged 65+ is higher than the average for the East of England, and England at 30% of the population. However, it is similar to the population in other parts of Norfolk – with the exception of Norwich City. This proportion is projected to increase over the next 20 years, with the greatest increase being in those aged 75 to 84.

Health and Wellbeing

In 2012, 61% of the adult population were considered as having excess weight, with 22% considered obese; both slightly below the national average.

In 2011, 7.4% of the population had a long term illness that limited day-to-day activity ‘a lot’ and 10.5% ‘a little’.

In 2011-12, 33.6% of adults regularly participated in 30 minutes of moderate intensity sport; this is lower than the national average.

There are an estimated 2,480 children (11.9%) living in poverty in South Norfolk. (HMRC Child Poverty 2010 statistics, cited in Norfolk’s Child Poverty Assessment, Norfolk County Council, April 2015)

The number of pupils achieving at least five GCSEs, including English and Maths (A+ to C) in South Norfolk is currently 67.5% (national average 53%)

Between December 2011 and March 2014 there were 200 excess winter deaths in South Norfolk (Office for National Statistics 2015).

Hospital admission rates from falls are rising: by 2020 in South Norfolk 9,020 people are expected to have a fall and 734 are predicted to be admitted to hospital as a result.

By 2020 it is expected that 3,100 people living in South Norfolk will be diagnosed with dementia. Based on current estimates over 2,000 of these will live in the community.

Housing Stock

On 1st April 2015 there were 57,769 properties in South Norfolk. Very few of these are second homes.

The total number of properties owned and managed by Registered Providers on 1st April 2015 was 6,685.
The Council has taken a proactive approach to reducing the number of homes standing empty for a long period of time. Using the government benchmark, the number of homes empty for more than 6 months has been reduced from 618 in 2007 to 338 in 2014, down by 45%.

South Norfolk Council transferred its housing stock to Saffron Housing in 2004. As a result, the only housing stock held by the Council is some temporary accommodation for homeless households.

20% of private sector households in South Norfolk experience fuel poverty.

Average house prices are about 7 times average earnings, making it very difficult for local people to become owner occupiers.

There are currently only 10 housing with care properties designated for people with dementia in South Norfolk.

Since April 2011:
- 3,035 homes have been built in South Norfolk;
- 971 additional affordable homes have become available – 552 new-build to housing associations plus 419 others (such as Help to Buy);
- The 552 to housing association comprised almost 18.2% of the 3,035 total.

5% of homes in the private sector are in disrepair.

1.7% of properties in South Norfolk don’t have central heating.

Housing Need

The Council commissioned along with other Norfolk local authorities, research into housing need, with findings published in early 2016

Economic Development

- 0.47% of the population was long-term unemployed in 2013.
- South Norfolk has lower levels of unemployment when compared to the national and regional average with 678 claiming Job Seekers Allowance (0.90% of the working population).
- In 2012, 10.3% of children (dependants under 20) were living in low income families.
- Average earnings in April 2014 were £20,384.
THE BIGGER PICTURE: WHERE HOUSING FITS NATIONALLY

South Norfolk Council and its partners are inevitably affected by nationwide pressures and it is crucial that we interpret these and react locally to make the most of chances presented and counter potential risks which arise.

There is a wide range of political, social, economic and environmental factors which impact on this Strategy, and which influence the Priority Outcomes. Many of them were debated during the 2015 General Election campaign, and some are included in the legislative programme, especially Housing and Planning Bill.

It is expected that the aspects of the national picture which will impact most on South Norfolk during the next three years will be:

Housing Policy
The Government’s intentions are to increase the number of homes built each year, and to improve access to owner occupation. This has led to several initiatives:

*Delivering More Homes*
South Norfolk Council, through the Greater Norwich Growth Partnership, has already embraced the growth agenda, and planning policy will deliver new homes into the 2030s, providing a significant contribution to local economic growth and employment opportunities.

*Helping First-Time Buyers*
Starter homes (to be sold at a discount of at least 20% from the market value to under-40s) are to be included in all sites of ‘a reasonable size’ as a significant proportion of the housebuilder’s affordable housing obligation.

*Self-build and Custom Housebuilding*
All local authorities will have a duty to have a register of people wishing to build their own home and to grant planning permissions for sufficient serviced plots to meet demand.

*The Right to Buy for Housing Association Tenants*
A voluntary agreement between the Government and housing associations will deliver this initiative to encourage tenants to become owners. There is potential impact on South Norfolk, especially the more rural parts where there is a limited supply of homes for rent.

*The Sale of Vacant High Value Local Authority Housing*
This will fund the Right to Buy discounts. Although there is no council housing in South Norfolk, there might be a sub-regional impact if certain property types in Norwich (such as larger family houses) were to leave the social sector.

*Higher Rents for Social Tenants (‘Pay to Stay’)*
Housing association tenants with an annual household income over £30,000 will have to pay a higher rent, perhaps up to the market rent. This reflects the Government’s view that subsidised housing should be occupied only by households who require the subsidy.

Welfare Policy
The Government is committed to saving £12 billion, and has proposed specific changes such as ending housing benefit for people under 21. All partners will need to react quickly to changes so that they can deliver this Strategy’s Priority Outcomes.
Health Policy
The government is committed to protecting expenditure on health. It has made mental health and dementia particular priorities. Dementia will have a significant impact on South Norfolk due to its aging population.

Limiting the Costs of Care / Independent Living
The Government’s wish to limit total public expenditure on care by helping people to live independently matches the Council’s wishes. This might well create opportunities for the Council to improve further the accommodation and services available in South Norfolk.

Energy Efficiency
With the policy move away from subsidies for low-carbon electricity generation, the emphasis on improved insulation should present further opportunities to reduce energy consumption and provide affordable warmth.

Training and Employment Opportunities
Government support for the Local Enterprise Partnership is likely to continue, building up the local economy, creating employment opportunities and demand for housing. The housing sector can also seek to take advantage of particular initiatives such as the creation of three million apprenticeships over the next five years.
OUR PRIORITIES

To achieve our ambitious vision we need to focus our attention – and to do this we have come up with four priority outcomes which offer structure to our work in 2016-19. Our four priority outcomes are:

1. PROVIDING IT: A good supply of housing within South Norfolk which meets residents’ needs, supports growth and can be afforded at all income levels.

2. ACCESSING IT: Residents have access to a home that meets their requirements, and that they can pay for and maintain.

3. LIVING IN IT: Residents live in warm, decent and safe homes within a resilient community, and receive support to help them achieve independent living in their own home.

4. PROSPERING IN IT: Residents receive easily accessible advice and support which improves the life chances of them and their families, which targets those needing early interventions and support to get the most out of life.

Each has a relationship to the others, and to wider priorities in South Norfolk: for example building new homes not only helps to increase the supply of housing to meet need, it also contributes to economic growth by providing jobs, generating inward investment and creating local spending power in South Norfolk.

Each priority outcome has a number of key areas which set out how it will be achieved. For example, to ensure that customers can access a home which meets their needs, which they can pay for and maintain we will focus on ensuring that homes are suitable for households’ financial, social and medical circumstances. This will help ensure that the option they have taken is sustainable and right for that individual in the long term.
The illustration below encapsulates the approach that we have taken.
Providing It: A good supply of housing within South Norfolk which meets residents’ needs, supports growth and can be afforded at all income levels

Overall, the housing market is working well in South Norfolk. We are providing new homes, reducing the number of empty homes and enabling the expansion of the private rented sector without rents rising excessively.

We recognise that in order to support economic growth, our housing supply will need to grow and be flexible to the requirements of those residing within our district.

How will we know we are there?

There are sufficient new homes developed to meet the need for housing growth as identified by the Joint Core Strategy
- 2,698 new homes to be built by 2019 (Greater Norwich Joint Core Strategy)

There is sufficient choice of homes and tenures to meet the range of housing needs (including specialist needs such as dementia).
- 486 new affordable homes built by 2019

Homes are not left empty for long periods of time and are prevented from becoming a blight to their neighbourhoods
- There will be no increase in the October 2015 base line number of long term empty homes (310) over the period of the strategy

What we will do to achieve our outcomes

Being “Investment Ready”
- Facilitate investment in South Norfolk; enabling the growth to which we are committed through the Local Plan, delivering infrastructure, housing and employment.
- Ensure new housing developments have a positive impact on local people who are accessing employment, education and training.

Enabling Delivery
- Meet needs by promoting and delivering affordable housing, through a range of tenure types (which includes helping first time buyers).
- Assess demand for custom build, and seek ways to meet this.
- Facilitate the development of and improve the standard of new affordable housing within South Norfolk, via the affordable housing grants scheme.
- Examine the possibilities to increase the number of private sector rental properties within new developments.
- Investigate the housing requirements of people with special needs.
- Seek opportunities for developing accommodation for people with special needs, including appropriate models of supported housing (including housing with care).
- Avoid the longer term costs of property adaptations by supporting the building of homes which promote independent living.
- Create and implement the Gypsies and Travellers Local Plan, to provide homes for that group.

Maximising Existing Housing Stock
- Reduce the number of empty homes using innovative techniques, maximising the benefits for local communities.
Utilising Council Assets efficiently and effectively
- Utilise the council-owned Big Sky Developments, to develop mixed residential and commercial property; and to maintain and rent residential property for market lets.
ACCESSING IT: Residents have access to a home that meets their requirements that they can pay for and maintain

We help all residents who need assistance to find the right home. If they are in priority housing need in South Norfolk, we will endeavour to accommodate them quickly. We will ensure that their housing is appropriate to their short and longer term needs and which they can afford to live in comfortably.

How will we know we are there?

Working together the Council and its partners will be ensuring homes meet the wider needs of residents to enable them to sustain their home.
- At least 90% of those who access homes through home options or housing advice are still suitably housed after a 6 month period.

Residents are able to access help when the need arises to find or sustain suitable accommodation.
- 2,250 households will have been assisted to find or sustain suitable accommodation.
  (517 households supported in 2014/15)

What we will do to achieve our outcomes

Enabling the appropriate access to housing
- Ensure that the Home Options Scheme continues to provide fair assessment for applicants
- Improve access to the private rented sector
- Promote low cost ownership
- Promote custom build opportunities
- Improve access to lodgings for single people
- Develop Early Help services that deliver meaningful and lasting outcomes.
- Work with partners so that the client is helped to get more outcomes than simply meeting their housing need when they come to us for help.
- Ensure that housing outcomes help residents to access employment, education and training for the long term.
- Ensure partners, stakeholders and residents understand “housing” and the wider impact that meeting housing need has on people's wellbeing.

Ensuring residents can manage their home and manage their finances
- Support residents to maximise their financial independence by providing guidance that minimises repeat requests for assistance.
- Enable residents to contribute to and be part of thriving and supportive communities.
LIVING IN IT: Residents live in warm, decent and safe homes within a resilient community, and receive support to help them achieve independent living in their own home

South Norfolk Council has a positive track record of supporting vulnerable households – sometimes this support is personal, and sometimes it is an improvement to the home. We work with our many partners to deliver and support customers who would otherwise require further, more intensive and costly interventions. We want customers to feel that the home has helped them to improve their opportunities in life, be it in health and wellbeing, employment and training, or being part of and contributing to a local community; and can remain living independently in their own home with dignity for as long as they feel able to.

How will we know we are there?

There is a reduction in the number of falls, excess winter deaths and hospital re-admissions in South Norfolk.
- An average of less than 58 excess winter deaths per year (Average over previous 5 years)

Vulnerable people are able to live independently for longer; resulting in cost savings for health and social care services, achieved by Independent Living and Early Help services' preventative interventions.
- 5,400 vulnerable people will be supported to live independently in their own home over the 3 years of the strategy (1,800 supported in 2014/15)

People with dementia, mental health issues and learning difficulties are able to access services in ways that achieve better outcomes for the individual and less cost to the public sector as a whole.
- A reduction of 30% in the number of people with learning difficulties placed in permanent residential care in line with partners ambitions (Re-imagining Norfolk Summit)

What will we do to achieve our outcomes

Achieving Independent Living
- Identify where independent living and early help interventions reduce the impact on health and social care services. In turn, this will create savings and reduce demand, ensuring external funding is utilised in the most efficient way.
- Provide housing adaptations and other interventions which enable people to continue living independently in their own homes.
- Enhance support to vulnerable residents to reduce avoidable hospital admissions and enable timely hospital discharge by ensuring homes are suitable to meet residents’ changing needs through joint working and innovative funding with partners.
- Help members of the community and staff to keep aware of, and able to support people with dementia and other mental health issues.
- Assist residents to maintain their homes and keep warm and well through access to small grants and loans.

Creating Affordable Warmth
- Make homes more energy-efficient and help residents to live in a warm home as cost-effectively as possible by providing information, advice and loans.
- Reduce the number of excess winter deaths through campaigns in high risk areas to help support older and vulnerable residents.

Enabling Decent and Safe Homes in Resilient Communities
- Improve the quality of housing and the local environment across all housing tenures by ensuring it meets legal standards and does not present unacceptable risks to health.
PROSPERING IN IT: Residents receive easily accessible advice and support which improves the life chances of them and their families, which targets those needing early interventions and support to get the most out of life

Through our approach to Early Help we have been supporting families and older people to resolve issues more quickly; preventing escalation, promoting wellbeing and creating sustainable futures for our residents. South Norfolk Council has been proactive in reducing homelessness in the district in the last three years, following the implementation of a prevention approach, and we want to build on this.

How will we know we are there?

Clients have their concern acted on at the first point of contact with SNC or its partners to ensure that they do not have to repeat their story to ‘umteen people’.
- 85% of requests for support result in appropriate support being in place within 5 days if initial contact

People who access our temporary accommodation benefit from a move-on plan which allows them to progress into sustainable accommodation.
- 90% of people moving on from temporary accommodation recorded as remaining suitably housed after a 6 month period.

All families and residents who access the Early Help Hub will have their case dealt with by a single point of contact in a way that is most relevant to their needs.
- 3,000 families receive support through Early Help across the 3 year period.
- 85% achieving positive outcomes from support

Residents are confident to apply for jobs and receive the right support to remain in employment.
- Number of JSA claimants in South Norfolk below 0.77% (October 2015 level) of working age population
- A 10% increase in the number of residents supported back into work each year.

A culture of partnership working and sharing of information leads to better outcomes for residents.
- 100% of Early Help partners signed into data sharing protocols

What we will do to achieve our outcomes

Maximising the opportunities of Early Help

- Utilise the Early Help Hub to improve the way we work with families and older people through coordinated and targeted support to achieve the right outcomes.
- Provide low cost early support which resolves problems before they escalate, avoiding higher costs and more significant impact on the household.
- Provide an appropriate range of temporary accommodation for homeless households, and support them to move into sustainable accommodation which they are able to maintain and prosper in.

Working collaboratively to secure wider outcomes

- Work with the voluntary and third sectors to ensure that the support they provide achieves sustainable outcomes for customers.
- Deliver outcomes that matter for residents by ensuring all partnership arrangements help us to deliver jointly-agreed outcomes.
- Work with partners to deliver plans detailed within the Greater Norwich Homelessness Strategy 2015-20.
- Fully utilise, promote and increase capacity for support from within the community and voluntary sector, to offer as much support to those who need it as is possible.

**Delivery of safeguarding arrangements**
- Develop our staff and partners to achieve a high standard of safeguarding practice.
- Improve the way we work with partners and the community to identify safeguarding issues as early as possible to prevent escalation.
- Reduce the number of victims of Domestic Abuse to ensure the safety of all in our communities; and reinforce a culture of non-tolerance of abuse within South Norfolk
HOW WILL WE MAKE IT HAPPEN?

Our new three year Housing Strategy is to be supported by a rolling Action Plan which will be revised quarterly to ensure that it is up to date and fit for purpose. The Action Plan sets out in detail how each priority will be achieved. These actions will be incorporated into future South Norfolk Council Business Plans and any individual initiatives will have a delivery plan which will set out a programme of activities and progress against each one.

The implementation of this Strategy will be overseen by the Council’s Housing, Wellbeing and Early Intervention Policy Committee, and the Action Plan will guide this work.

The delivery of objectives detailed in our Strategy and Action Plan is supported by other local housing-related strategies and action plans.

To ensure successful outcomes are achieved the Housing Strategy requires buy-in and commitment across all organisations and from our residents. This table offers suggestions of how everyone can contribute.

<table>
<thead>
<tr>
<th>Partner</th>
<th>Role</th>
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<tbody>
<tr>
<td>South Norfolk Council</td>
<td>Lead Housing Strategy partner</td>
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<td></td>
<td>Drive, support and co-ordination of activities</td>
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<td></td>
<td>Identifying funding opportunities</td>
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<td>Research and evidence of need</td>
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<td>Delivery of services</td>
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<td>Influencer of services</td>
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<td>Enforcer of standards in the private sector</td>
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<td>Facilitator of partnership meetings</td>
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<td>Home Options service – ensuring fair access</td>
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<td>Benefits Service – ensuring support for those in need</td>
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<td>Norfolk County Council</td>
<td>Health and Wellbeing lead including the Joint Strategic Needs Assessment</td>
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<td>Commissioner of housing support</td>
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<td>Early Help provider</td>
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<td>Occupational Therapy Service</td>
<td>Specification and integrated provision</td>
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<td>Specialist help provider</td>
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<td>Children’s Services</td>
<td>Specialist help provider</td>
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<td>Parish Councils</td>
<td>Information sources and partners</td>
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<td>South Norfolk CCG</td>
<td>Commissioner of services</td>
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<td>Registered Providers (RPs)</td>
<td>Affordable housing providers</td>
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<td>Community Safety</td>
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<td>Access to housing</td>
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<td>House builders</td>
<td>Providing new homes for market sale</td>
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<td>Helping first-time buyers via Help to Buy</td>
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<td>Homes and Communities Agency</td>
<td>Funding and regulating RPs</td>
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<td>Voluntary Sector/Community Groups</td>
<td>Facilitating Independent Living</td>
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<td>Delivery of services</td>
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<td></td>
<td>Advocacy</td>
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<tr>
<td>All Early Help partners</td>
<td>Providers of services and interventions</td>
</tr>
<tr>
<td>Residents</td>
<td>Feel empowered to take control of their future</td>
</tr>
</tbody>
</table>
REVIEW AND MONITORING

The Action Plan will be a ‘live’ operational document and as such, it will be kept under review and updated during the year. Any significant legislative or the local market changes will be taken into consideration as part of the Action Plan and reflected in further iterations of the Strategy thereafter.
South Norfolk Housing Strategy 2016-19

ACTION PLAN 2016/17
Vision:

To ensure all residents have access to and are able to maintain a good quality home that meets their needs and aspirations. The housing secured, and the support provided where appropriate, will assist local people in maximising their life opportunities. Residents will be ‘opportunity ready’ for housing, jobs, healthy lifestyles, independent living and their community.

INTRODUCTION

The Housing Strategy covers the period from April 2016 to March 2019. It sets put how the Council and its partners will achieve its vision through four Priority Outcomes:

- Providing it
- Accessing it
- Living in it
- Prospering in it

This Action Plan sets out in detail how the Council will work to deliver each of the Priority Outcomes. The points include direct actions by the Council, but also those that arise from our strategic role – working with partners to ensure that they deliver their agreed actions.

This is a one-year Action Plan, and as a working document, it will be updated quarterly. If you wish to discuss any aspect of this document, please contact Liam Pickering, Housing and Public Health Partnerships Officer (lpickering@s-norfolk.gov.uk 01508 533783).

Note: As this is a one-year plan, all actions are to be completed within the year unless a longer timescale is specified.
**PROVIDING IT**: A good supply of housing within South Norfolk which meets residents’ needs, supports growth and can be afforded at all income levels

<table>
<thead>
<tr>
<th><strong>What we will do</strong> (taken from the Housing Strategy)</th>
<th><strong>Action Point</strong></th>
<th><strong>Outcomes</strong></th>
<th><strong>Responsible</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Being “Investment Ready”</strong></td>
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</table>
| Facilitate investment in South Norfolk; enabling growth to which we are committed through the Local Plan, delivering infrastructure housing and employment. | • Implement the Greater Norwich Infrastructure Plan  
• Deliver the Greater Norwich Joint Core Strategy (the Local Plan for South Norfolk)  
• Ensure that housing developments deliver the District’s growth, while contributing to Greater Norwich and County level growth objectives | Residents of South Norfolk have suitable provision of services and infrastructure to meet local need | Greater Norwich Growth Board  
Planning Policy Team  
Development Management |
| Ensure new housing developments have a positive impact on local people who are accessing employment, education and training. | • Encourage housing developments achieve the Building for Life standard  
• Assess the quality of completed developments to improve standards | Homes and their environment meet the ambitions of the Council and fulfil the requirements of residents | Development Management  
Planning |
| **Enabling Delivery**                                 |                  |              |                 |
| Meet needs by promoting and delivering affordable housing, through a range of tenure types (which includes first time buyers). | • Seek the Local Plan target tenure mix on larger sites: 85% rent / 15% intermediate tenures  
• Support housebuilders applying for Help to Buy | Homes provided match need and affordability  
Access to home ownership | Partnerships Team + Development Management  
Partnerships Team |
| Promote Custom build | • Keep the register of interest set up in November 2014, implementing government Regulations.  
• Seek and pursue serviced plot opportunities | Plots available for people interested in custom build. More homes built. | Partnerships Team + Planning |
|----------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------|
| Facilitate the development of and improve the standards of new affordable housing within South Norfolk, via the affordable housing grants scheme. | • Use SNC funding to achieve energy efficiency standards higher than Building Regulations  
• Use funding to deliver homes suitable for people with mobility problems | Affordable warmth for social housing tenants  
Ability to live independently | Partnerships Team |
| Investigate the housing requirements of people with special needs. | • Work with partners to identify the needs of: older people, mental health problems, learning disabilities, physical/sensory disabilities, substance misuse, etc. (13 groups identified) | Robust evidence on which to base housing and planning policy | Partnerships Team |
| Seek opportunities for developing accommodation for people with special needs, including appropriate models of supported housing (including housing with care) | • Work with partners to achieve the delivery of housing with care in locations identified in the Local Plan: Cringleford, Hethersett, Wymondham and Long Stratton  
• Take advantage of emerging opportunities to deliver housing with care in other locations | Independent living for older people who require some support | Partnerships Team + Development Management |
| Create and implement the Gypsies and Travellers Local Plan, to provide homes for that group. | • Adoption of a Local Plan. | A clear policy for the provision of homes in suitable locations | Planning Policy Team |

**Maximising Existing Housing Stock**

| Reduce the number of empty homes using innovative techniques, maximising benefits for local communities. | • Monitor and work with the owners of long-term empty properties (empty for 6 months) in South Norfolk | Effective use of the housing stock. Less deterioration and potential unsightliness. | Housing Standards Team |
**Utilising Council assets effectively and efficiently**

<table>
<thead>
<tr>
<th>Benefit</th>
<th>Action</th>
<th>Outcome</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Utilise the council-owned Big Sky Developments, to develop mixed</td>
<td>Enable the development of private rented sector homes at Poringland</td>
<td>Use of Council resources to provide a financial return while contributing to the growth of Greater Norwich and tenure diversification</td>
<td>Property Team</td>
</tr>
<tr>
<td>residential and commercial property; and to maintain and rent</td>
<td>and Long Stratton</td>
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<tr>
<td>residential property for market lets.</td>
<td>Identify future opportunities for utilising Big Sky developments:</td>
<td></td>
<td>Property Team</td>
</tr>
<tr>
<td></td>
<td>e.g. land at Wymondham</td>
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</tbody>
</table>

**ACCESSING IT:** Residents have access to a home that meets their requirements that they can pay for and maintain.

<table>
<thead>
<tr>
<th>What we will do (taken from the Housing Strategy)</th>
<th>Action Point</th>
<th>Outcome</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enabling the appropriate access to housing</td>
<td></td>
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<tr>
<td>Ensure that the Home Options Scheme continues to</td>
<td>• Review with partner housing associations</td>
<td>Fair access to appropriate housing. Reduction in repeat applications for housing.</td>
<td>Housing Advice Team</td>
</tr>
<tr>
<td>provide fair assessment for applicants</td>
<td>• Implement any agreed changes</td>
<td></td>
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<tr>
<td>Improve access to the private rented sector</td>
<td>• Work with landlords and agents to increase the size and availability of</td>
<td>Quicker access to the PRS, reducing reliance on the housing register</td>
<td>Housing Advice Team</td>
</tr>
<tr>
<td>(PRS)</td>
<td>the private rented sector</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Promote low cost ownership</td>
<td>• Promote Starter Homes as required by the Housing Bill</td>
<td>Better access to home ownership</td>
<td>Partnerships Team</td>
</tr>
<tr>
<td>Promote custom build opportunities</td>
<td>• Fulfil obligations arising from the Housing Bill</td>
<td>Access to plots for South Norfolk residents</td>
<td>Partnerships Team</td>
</tr>
<tr>
<td>Improve access to lodgings for single people</td>
<td>• Work with partners to develop the supply and range of lodgings available</td>
<td>Residents are able to access suitable safe accommodation. Reduction in repeat homelessness among this group</td>
<td>Partnerships Team</td>
</tr>
<tr>
<td>Work with partners so that the client is helped</td>
<td>• Improved collaboration between Housing Options Officers and Early Help</td>
<td>Residents able to address issues more sustainably leading to improved safety and wellbeing and a reduction in repeat homelessness among this group</td>
<td>Housing Advice Team</td>
</tr>
<tr>
<td>to get more outcomes than simply meeting their</td>
<td></td>
<td></td>
<td>and Early Intervention Manager</td>
</tr>
<tr>
<td>housing need when they come to us for help.</td>
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</tbody>
</table>
| Ensure that housing outcomes help residents to access employment, education and training for the long term. | • Co-locating external services into SNC buildings to aid partnership working | • Work with support providers to ensure that those leaving supported accommodation have the appropriate life skills to help them achieve employment education and training.  
• Work with early help partners to deliver programmes that provide support for young people to access employment education and training. | Reduction in number of supported accommodation move-ons making repeat homeless applications or repeated referrals for support with the same issues. Reduced cost to services as a result. | Housing options team / housing and Public health partnerships team |

| Ensure partners, stakeholders and residents understand “housing” and the wider impact that meeting housing need has on people's wellbeing. | • Work with partners to encourage people to become tenancy ready.  
• Move-on protocols with supported accommodation and home options take into account someone’s ability to live independently when weighting banding | Within those receiving this support a reduction seen in those making repeat homeless applications or repeated referrals for support with the same issues. Reduction in repeat homeless applications | Housing Advice Team |

<p>| <strong>Ensuring residents can manage their home and manage their finances</strong> | Support residents to maximise their financial independence by providing guidance that minimises repeat requests for assistance. | • Specialist Welfare Rights and Debt Adviser to be available. | Improved financial independence for those receiving support. Positive financial impact on partners through reductions in debts and arrears | Independent Living Team |</p>
<table>
<thead>
<tr>
<th>Enable residents to contribute to and be part of thriving and supportive communities.</th>
<th>Work with floating support providers to ensure that vulnerable residents budgeting and financial issues are addressed at an early stage.</th>
<th>Community Capacity Team to engage with individuals and community groups to support them to support the community.</th>
<th>Community based services provide effective, locally relevant services. Improvements seen against identified need</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Provide ‘Go for It’ grants and other small grants to residents wanting to start community projects.</td>
<td>Gaps in support service delivery minimised</td>
<td>Community Capacity Team</td>
<td></td>
</tr>
<tr>
<td>• Work with community groups to establish project delivery needs within given locations</td>
<td></td>
<td>Community Capacity Team</td>
<td></td>
</tr>
</tbody>
</table>

**LIVING IN IT**: Residents live in warm, decent and safe homes within a resilient community, and receive support to help them achieve independent living in their own home

<table>
<thead>
<tr>
<th>What we will do (taken from the Housing Strategy)</th>
<th>Action Point</th>
<th>Outcomes</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Achieving independent living</strong></td>
<td>Work with CCG to establish locations with specific need and provide targeted interventions within that location.</td>
<td>Improvements in health and wellbeing of residents in those locations with reduction seen in hospital admissions and care costs</td>
<td>Independent Living Team</td>
</tr>
<tr>
<td>Identify where independent living and early help interventions reduce the impact on health and social care services. In turn, this will create savings and reduce demand, ensuring external funding is utilised in the most efficient way.</td>
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</tbody>
</table>
Provide housing adaptations and other interventions which enable people to continue living independently in their own homes.

- Work with CCG to implement small grants scheme for people with dementia to make homes more suitable
- Facilitate delivery of Disabled Facilities Grants
- Continue to deliver Integrated Housing Adaptations Team (IHAT) services
- Deliver an integrated home improvement agency service for vulnerable residents
- Between 50 and 100 homes made dementia friendly
- Residents living independently for longer, reduction and delay in hospital admission and moves to residential care
- Quality of housing stock maintained
- Independent Living Team
- Housing Standards Team
- Independent Living Team
- Independent Living Team

Enhance support to vulnerable residents to reduce avoidable hospital admissions and enable timely hospital discharge by ensuring homes are suitable to meet residents’ changing needs through joint working and innovative funding with partners.

- Deliver objectives of multi-agency affordable warmth group
- Deliver falls prevention programmes with leisure and health partners
- Work with Integrated Commissioning Teams to ensure that as people age and need more support and care there is sufficient provision available.
- Support flu clinics and use these as a means to engage with and inform at risk members of the public of support services and provision available.
- Reduction in excess winter deaths, avoidable hospital admissions and falls and the associated costs to services
- Recordable increasing in health and wellbeing and independent living of those receiving support
- Housing Standards Team
- Partnerships Team
- Independent Living Team

Help members of the community and staff to keep

- Ensure a basic level of SNC able to offer suitable advise to
- Housing and
| **Aware of, and able to support people with dementia and other mental health issues.** | **Awareness across the organisation of dementia. Higher level of training for those colleagues with frontline customer facing roles.** | **Residents**
- Members of the community have increased awareness of dementia and support available leading to better outcomes for residents with dementia and carers
- Between 50 and 100 homes made dementia friendly **Public Health Partnerships Officer** |
| --- | --- | --- |
| • Work with providers to deliver dementia friend champions training to members of the SN community **Independent Living Team**
• Provide Forget Me Not grants to improve homes to support people with dementia and their carers to maintain their independence | **Reduction in fuel poverty and improved health of those receiving grant.** **Housing Standards Team** |
| **Assist residents to maintain their homes and keep warm and well through access to small grants and loans.** | **Provide advice and assistance to vulnerable older people to service and maintain their boilers of using £5000 funding from SN CCG** **Housing Standards Team** |
| • Provide advice and assistance to vulnerable older people to service and maintain their boilers of using £5000 funding from SN CCG | **Reduction in fuel poverty and improved health of those receiving grant.** **Housing Standards Team** |

**Creating Affordable Warmth**

<table>
<thead>
<tr>
<th>Make homes more energy-efficient and help residents to live in a warm home as cost-effectively as possible by providing information, advice and loans.</th>
<th>Use result from stock condition survey to target areas where energy efficiency measures are most needed.</th>
<th>Reduction in fuel poverty and improved health of those receiving support <strong>Housing Standards Team</strong></th>
</tr>
</thead>
</table>

**Enabling decent and safe homes in resilient communities**

| Improve the quality of housing and the local environment across all tenures by ensuring it meets legal standards and does not present unacceptable risks to health. | • Work with housing association partners and residents to ensure that social housing properties meet required standard
• Through the private sector stock condition survey, focus attention areas with concentration of properties that do not meet required standards | Social Housing properties continue to meet the required standard. Measurable improvement in quality of private sector stock in those areas identified. Resulting in reduction in homelessness applications citing poor housing **Housing Standards Team** |
| --- | --- | --- |
| • Work with housing association partners and residents to ensure that social housing properties meet required standard
• Through the private sector stock condition survey, focus attention areas with concentration of properties that do not meet required standards | **Housing Standards Team** |
PROSPERING IN IT: Residents receive easily accessible advice and support which improves the life chances of them and their families, which targets those needing early interventions and support to get the most out of life

<table>
<thead>
<tr>
<th>What we will do (taken from the Housing Strategy)</th>
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<th>Outcomes</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Maximising the opportunities of Early Help</td>
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</tr>
<tr>
<td>Utilise the Early Help Hub to improve the way we work with families and older people through coordinated and targeted support to achieve the right outcomes.</td>
<td>• Implement information sharing agreements with Early Help partners to help deliver joined up actions in response to customers issues&lt;br&gt;• Using a set of indicators and an evidence base, target interventions into child poverty at areas with the most need&lt;br&gt;• Provide proactive and reactive Domestic Abuse support based within the Hub</td>
<td>Information sharing agreements in place with all partners by March 2016.&lt;br&gt;Localities identified by Jan 2016 and process for monitoring outcomes in place by March 16&lt;br&gt;Early Help domestic abuse worker undertakes interventions and preventative work with 85 cases per year&lt;br&gt;Less children in care</td>
<td>Early Intervention Manager&lt;br&gt;Early Intervention Manager&lt;br&gt;Early Intervention Manager</td>
</tr>
<tr>
<td>Provide low cost early support which resolves problems before they escalate, avoiding higher costs and more significant impact on the household.</td>
<td>• Embed and monitor a culture of continuous improvement within the Early Help hub and monitor. Improve practices based on shared learned across partners&lt;br&gt;• Use Community Connectors to bridge the gap between residents, community groups and services</td>
<td>Identified issues are improved leading to improved outcomes for residents and partners.&lt;br&gt;Services delivered will be more locally relevant with an increase seen in community engagement.</td>
<td>Early Intervention Manager&lt;br&gt;Early Intervention Manager</td>
</tr>
<tr>
<td>Provide an appropriate range of temporary accommodation for homeless households, and support them to move into sustainable accommodation which they are able to maintain and prosper in.</td>
<td>• Review temporary accommodation provision to ensure it meets the need&lt;br&gt;• Use evidence from review to remodel</td>
<td>A cost effective temporary accommodation provision that results in long term outcomes for residents</td>
<td>Housing Advice Team&lt;br&gt;Partnerships</td>
</tr>
<tr>
<td>Working collaboratively to secure wider outcomes</td>
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<td>-------------------------------------------------</td>
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</table>
| Work with the voluntary and third sectors to ensure that the support they provide achieves sustainable outcomes for customers. | • Adopt outcome based performance measures when commissioning new services or reviewing SLAs of existing services  
• Consider with partners using the Housing First model of resettlement |
| Commissioned services will provide outcome based support to an identified number of residents | All  
Housing Advice Team |
| Deliver outcomes that matter for residents by ensuring all partnership arrangements help us deliver jointly-agreed outcomes. | • Implement joint working protocols with all Early Help partners  
• Encourage an ethos toward shared outcomes and efficiency among partners |
| Commissioned services will provide outcome based support to an identified number of residents | Partnerships Team  
Early Intervention Manager |
| Work with partners to deliver plans detailed within the Greater Norwich Homelessness Strategy 2015-20. | • Complete actions listed within Homelessness Strategy action plan |
| Improvements within homelessness prevention and provision of services | Housing Advice Team |
| Fully utilise, promote and increase the capacity for support from within the community and voluntary sector, to offer as much support to those who need it as is possible. | • Community capacity team to engage with and support community based provision  
• Conduct research into gaps within support service delivery and evolving gaps as a result changes to service funding in order to minimise these gaps |
| Community based services provide effective, locally relevant services  
Gaps in support service delivery minimised | Community Capacity Team  
Partnerships Team |
| Delivery of safeguarding arrangements |  |
| Develop our staff and partners to achieve a high standard of safeguarding practice. | • Ensure all staff are suitably trained within safeguarding to a level relevant to their role |
| Safeguarding issues are identified and addressed resulting in improved safety of residents | All SNC managers |
| **Improve the way we work with partners and the community to identify safeguarding issues as early as possible to prevent escalation.** | **Have information sharing protocols in place with the relevant partners to facilitate the sharing on safeguarding information.** | Safeguarding issues are identified and addressed through partnership working and information sharing resulting in improved safety of residents. Partners utilising the Hub achieve progress on shared objectives through colocation. | **Early Intervention Manager**
**Early Intervention Manager**
**Early Intervention Manager** |
|---|---|---|---|
| **Continue to identify areas for improvement within safeguarding practice and implement the necessary improvements.** | **Take a collaborative approach to safeguarding through working in partnership with our Early Help partners** |  | **Early Intervention Manager**
**Early Intervention Manager**
**Early Intervention Manager** |
| **Utilise the Early Help hub as a space for co-location of services, leading to improved communication.** |  |  |  |
| **Reduce the number of victims of Domestic Abuse to ensure the safety of all our communities; and reinforce a culture of non-tolerance of abuse within South Norfolk.** | **Deliver an enhanced DA accommodation service in the Diss area with Orwell HA using DCLG grant funding** | 4 additional refuge spaces available including 3 community based providing safe accommodation for those at risk. Early Help domestic abuse worker undertakes interventions and preventative work with 85 cases per year. | **Orwell HA**
**Early Intervention Manager**
**Early Intervention Manager** |
|  | **Deliver a district wide Early Help domestic abuse support provision using DCLG grant funding.** |  |  |
|  | **Work with partners to deliver projects that reinforce healthy relationships from an early age.** |  |  |
South Norfolk Council
Housing Strategy 2016-19

Responses to Consultation
Introduction
The issue of housing is of significant importance to the South Norfolk Council area, to its residents and to partner agencies and service providers. The South Norfolk Council Strategy will underpin the delivery of housing and housing services until 2019 and as such it is vital that this document is fit for purpose and has the support of local people and partner organisations.

Aim of the consultation
• To evaluate the suitability of the draft Housing Strategy
• To establish any potential barriers to implementation of the document
• To identify actions for delivery of the Strategy via the Action Plan

The consultation process
• The consultation period ran for twelve weeks between 3rd August 2015 and 23rd October 2015.
• It was aimed at public and partner agencies and sought feedback on the priorities contained within the Strategy and on the document as a whole.
• 2 consultation events held 8th and 22nd September 2015
• A survey was available online and in hard copy for postal return
• Surveys sent to several key stakeholders and all parish councils
• Consultation advertised via social media, website, internal and external communications and via partner agencies
• Posters and flyers put up within SNC buildings and partner services
• Discussions at events and forums including South Norfolk Older Peoples Forum
• Responses to e-survey completed confidentially

Responses
• 58 full responses survey including 51 to online survey and 7 surveys returned by post or email
• 20 attendees at event on the 8th September representing their organisations
• 18 attendees at event on the 22nd September
• Collated responses via surveys or letters from groups including:
  o Stoke Holy Cross Parish Council
  o Tacolneston Parish Council
  o Tasburgh Parish
  o Easton Parish Council
  o Trowse with Newton Parish Council
  o Cringleford Parish Council
  o Diss Town Council
  o Marlingford Parish Council
  o South Norfolk Clinical Commissioning Group
Eastern Landlords Association

Several other Parish Councils whose names have not been recorded on the survey reports.

The consultation events received representation from several organisations including:

- South Norfolk Clinical Commissioning Group
- Genesis Housing Association
- Saffron Housing Trust
- Norfolk County Council
- Solo Housing
- N-able
- Broadland Housing Association
- Together
- Cotman Housing
- Orbit Housing
- Julian Support
- Age UK
- Eastern Landlords Association
- Several Parish Councils
Survey results
The online survey and postal return surveys asked respondents whether they agreed or disagreed with our priorities. Below are findings for each priority outcome. These were accompanied in the survey returns by a number of comments; these will be evaluated in more detail at a later stage in this report.

Did respondents agree with the priority outcomes?
The responses above show that the vast majority of people surveyed agreed with the general approach taken within the Strategy with regard to the 4 priority outcomes that the strategy seeks to address. The verbal feedback received from the workshops and conversations with forums and groups backs this data up; there was general agreement that these are the correct priorities for the strategy to address.

The survey contained a number of closed questions aimed at identifying what people felt in relation to different topics within the strategy:

- There was widespread agreement with the priorities
- Results suggested people felt there was a need for a range of tenure types within South Norfolk
- When asked “how can we make sure people can access a home that meets their needs?” Results suggested that all of the following were needed:
  - A range of types and sizes of home
  - A range of tenure of types
  - Support available for issues that might have an effect on their homes
  - Making sure homes were affordable

- A number of groups were identified as needing more help to live in their home:
  - People with serious health conditions or disabilities and older people were the most commonly identified
  - Single people and families were the least commonly identified groups

- A range of things were identified that would help people live well in their homes as their needs change with people supporting adaptations to homes, suitable new home, strong communities, support and advice services, grants to improve homes and making homes more energy efficient.
- People felt it was important to work with a range of organisations to allow people to prosper in their own home
- People felt that intervening early to resolve and prevent problems stops issues getting worse, saves money in the long term and stops the problem affecting other people or the community

Comments
As well as producing a range of statistical information the surveys also produced a wealth of comments. The amount of response to the survey, letters and stakeholder events has resulted in there being too many comments to allow an individual response to each comment. The comments have therefore been grouped according to theme with a view to offering a representative illustration of each of the points. These themes and our responses to representative comments on the issues raised are detailed in the tables below.
## Providing It

<table>
<thead>
<tr>
<th>Issue</th>
<th>Representative Comments</th>
<th>Response</th>
</tr>
</thead>
</table>
| Property types and design | • Identify how many houses and what type will be required  
• Smaller properties are needed  
• Differing sizes are important  
• … sheltered housing / …retirement communities  
• … flats, 2 and 3 bedroomed houses [are needed]  
• Build more affordable housing  
• Concentrate on greatest need … social rent  
• Allow self builders to build suitable housing in rural areas  
• Properties need to be well above current standards  
• All affordable housing should be adaptable | The Council is attempting to meet the need for smaller homes, especially for rent. The Action Plan makes it clear how we will do this.  
The matters concerning the balance of property sizes built for sale and the standards to which they are built will be considered when the Local Plan is reviewed, as will the implications of self-build. However, affordable housing is built to lifetime homes standard.  
Until the Local Plan is reviewed through a formal procedure, all development must comply with adopted policy: [http://www.south-norfolk.gov.uk/planning/1952.asp](http://www.south-norfolk.gov.uk/planning/1952.asp) |
| Meeting need | • Local people should be the priority [for homes for sale and rent]  
• Help people to get on the property ladder  
• Young people should have opportunities … so we don’t lose a valuable asset  
• There are few small adapted homes for [older] people to rent or buy  
• Hidden need … mental health and older people … dementia  
• Gypsies and Travellers – don’t forget them  
• … first time buyers homes – 1 or 2 bed semis  
• Housing needs studies are quickly out of date  
• The needs of Norwich need to be factored in  
• There should be key worker housing to attract staff  
• Parish councils should be involved [in ensuring housing goes to local residents]  
• “Override the nimby’s” | We have amended the Strategy to refer more clearly to the needs of various groups of people, including those with special needs and local people. The Action Plan sets out what the Council will do in seeking to meet these needs.  
The Council recognises the contribution that affordable housing can make to community sustainability. Refer to the Action Plan for details about how we intend to achieve this.  
We acknowledge the various needs raised by respondents. Growth provides the opportunity to provide a wide range of homes, including for people with special needs. ‘Local connection’ criteria are based on a policy decision by the Council after thorough consideration, and the eligibility and priority of applicants is decided through objective criteria. |
| Community | • The countryside is becoming the preserve of the | The Council seeks to balance the views of various |
rich
• Listen to communities … observe what they consider is needed
• …using local contractors
• Consult local people … accessible exhibitions, road shows and questionnaires

stakeholders in drafting policy. We recognise the importance of those who currently live in South Norfolk in influencing the future of the community. These wider social and economic aspects are integral to the Housing strategy, and are reflected in the Action Plan.

### Infrastructure
- Ensure there is infrastructure to support [new housing]
- … facilities nearby such as shops, parks etc.
- …e.g. schools and other services such as leisure
- Will CIL [Community Infrastructure Levy] suffice?
- Safe cycling and walking to local services. Cycle paths can also be used by mobility scooters

The Greater Norwich Growth Programme [http://www.greaternorwichgrowth.org.uk/delivery/growth-programme/] co-ordinates the provision of infrastructure. There is also dialogue with the Health Service, intended to ensure the availability of GP services.

### Location
- Smaller developments … in proportion to size of existing community

The Local Plan [http://www.south-norfolk.gov.uk/planning/1952.asp] sets out the sites selected for housing development. The Council acknowledges that in some instances, because there was not the required 5 year supply of housing land, applicants obtained planning permission for some sites which were not allocated in the Local Plan.

### Environment
- Use brownfield sites first
- Design should enhance, not ‘impact’
- Better thought given to the density per acre
- …green renewable energy
- …pedestrian and cycle access to facilities
- Effect of large scale developments
- What is your target for reducing empty homes?

Design is important (within the home and outside it), and housing development proposals are assessed against the Place-Making Guide [http://www.south-norfolk.gov.uk/planning/5287.asp].

The Council has a good record in bringing empty homes into use, and a target for 2016/17 activity is in the Action Plan.

### Accessing It

| Housing need | Quality research to establish the type of housing that is suitable to meet the needs of a balanced population | A Strategic Housing market Assessment has been completed for Central Norfolk. It considers housing need in all tenures. This is a key context document. We encourage Parish Councils’ involvement in any |
| **• Ensure socially balanced communities** | proposals for local needs housing as an exception to normal planning policy. |
| **• Liaise with Parish Councils – they understand local need. And support community groups** | |
| **• I don’t like the idea of houses with just one person in them** | |

**Helping access**

| • Current stock should be accessed on the basis of need | Although the Council is seeking to increase the number of smaller homes, there are not enough 1 and 2 bedroom properties available for rent. We have to prioritise through Home Options [http://www.snhomeoptions.org.uk/Data/ASPPages/1/30.aspx](http://www.snhomeoptions.org.uk/Data/ASPPages/1/30.aspx) |
| • People need a home that is right for them. Some people need help with this | Some affordable homes have priority for local residents, and we expect this arrangement to continue. |
| …a right to access homes where [people] were born/raised is not an absolute right. Folk need to be encouraged to be brave and move (not too far perhaps!) to places where employment, transportation and services are more easily accessed | We have a Housing Advice service which responds to requests for help [http://www.south-norfolk.gov.uk/housing/513.asp](http://www.south-norfolk.gov.uk/housing/513.asp) |
| • Reply to people when they contact SNC with housing issues. Yet you don’t, because you don’t really care | We respond to all contacts. We will continue to review how best to make the advice available for those who need it. |
| • Provide advice more readily | |
| • Perhaps a mobile unit to visit village halls to provide signposting | The Housing Strategy has been amended to highlight the importance of obtaining a home in which to live and prosper. The Strategy and the Action Plan have been amended to emphasise this, demonstrating the Council’s wish to help residents to access all tenures. |
| • Spend money, get building: if you haven’t got it, borrow it | We advise and work with individuals to identify the best solution for their circumstances. |
| • Link to Community Connectors | We are aware of the potential impact of the Right to Buy on the future availability of affordable housing. |
| • Could more families be encouraged to live together? | |
| • Encourage 2 or 3 people to make joint tenancy applications (noting potential tenancy management problems) | |
| • How to establish which individuals need help | |
| • Lobby against the Right to Buy in housing association property | |

**Homelessness**

| • Be clear how the Council is addressing homelessness (including statutory duty) Suitability and location of temporary accommodation | We have made homelessness an aspect of ‘Accessing it’ – previously it was only in ‘prospering in it’. The Action Plan also reflects this. |
| Specialist accommodation | - A joined up approach is needed with Public Health, CCG and health care  
- Separated parents should have somewhere for children to stay  
- The impact of HB rules limit under-35s’ access to accommodation  
- Proposal to exclude under-21s entirely  
- Need for tenancy awareness courses  
- Encourage people to offer to ‘rent a room’  
- Encourage young people to live with their parents | Public sector organisations recognise the benefits of joint working to achieve independent living. The Council intends to explore how particular requirement can be best met.  
We note these suggestions, and we will consider whether they might be appropriate in meeting the needs of individual customers. |
|---|---|---|
| Affordable housing | - Affordable housing is important  
- Social rents will help not only single parents or people who cannot work, but those who do work but cannot afford a mortgage  
- More shared ownership | Current trends affecting social housing are now set out more clearly, and the intention to keep Home Options under review is in the Action Plan. |
| Ownership | - Ensure planning policies allow for a range of homes by self builders  
- Make grants easily available, affordable plots… | We will be implementing the custom build obligations proposed in the Housing and Planning Bill. |
| Private rent | - [more] straightforward rent  
- Don’t allow buy to let  
- Potential landlords are reluctant to let due to complexity of RADS schemes  
- Rent deposits for those who are statutorily homeless  
- Private rent is a development opportunity for RPs | The Council recognises that people needing assistance will be housed in the private rented sector, and we will work to improve people’s ability to access it.  
Buy to let is likely to continue, and the Council will ensure that standards in the private rented sector are satisfactory. |
| Changing needs | - Councils have a duty to provide housing; how the clients pay for it is up to them and the Government  
- Those that need help should get it, but that does not mean forever  
- New homes should be future proofed  
- If we had a good mix of housing, people would feel more able to switch housing to meet their individual needs | The Strategy is based on the premise that people have a ‘housing pathway’, with different needs at different times. Many will be able to meet their needs without assistance, but other will require help.  
The suggestions made reflect the wide range of respondents’ interests, and all are noted. |
needs at different times during their lifetime, particularly if there was support/ incentive to do this

- The current DFG system sort of works – just needs better funding
- Provide “attractive” options that will persuade older people to vacate their large family homes before they are forced out by infirmity. They are too terrified of ‘going into a home’
- Look several years ahead
- Adopt the flexible design principles as used by Saffron Housing, e.g. removable panels to allow greater door widths
- Build different properties to suit stages (young, elderly or disabled)
- What happens when to the surviving partner when a Housing with Care resident dies?

It is intended that, by taking a person-centred approach, the Council can help residents to achieve their wishes.

The Strategy and the Action Plan have been amended to reflect the points raised.

### Living in it

<table>
<thead>
<tr>
<th>The home</th>
<th>Independence is a key aspect of this part of the Housing Strategy. The Council believes that the adaptations service in South Norfolk provides a good service, although we recognise that there is always scope for improvement. Any specific suggestions would be welcome.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Action Plan reflects the changing national context. Our approach is to take advantage of new initiatives, and that will continue.</td>
</tr>
<tr>
<td>You see evidence [of bad housing] especially with private landlords</td>
<td></td>
</tr>
<tr>
<td>We need to support the vulnerable who wish to remain in their homes</td>
<td></td>
</tr>
<tr>
<td>When making improvements, look at the needs of people first</td>
<td></td>
</tr>
<tr>
<td>Adaptations should be by specially commissioned traders</td>
<td></td>
</tr>
<tr>
<td>Adapt early – before the condition worsens</td>
<td></td>
</tr>
<tr>
<td>When you agree to adaptation work DO IT!!!</td>
<td></td>
</tr>
<tr>
<td>RPs reluctant to adapt properties if other properties are more suitable</td>
<td></td>
</tr>
<tr>
<td>Obsolescence is an issue which is not addressed</td>
<td></td>
</tr>
<tr>
<td>What is the council’s view of the Green Deal announcement?</td>
<td></td>
</tr>
</tbody>
</table>
- Green energy to reduce cost, with home visits by Advisors
- Deliver affordable warmth despite spending cuts
- Making some RP homes energy efficient might not be financially viable

<table>
<thead>
<tr>
<th>Households</th>
<th>It is acknowledged that some homes, especially those with solid walls are expensive to improve. However, we believe that making the most of the existing stock is important.</th>
</tr>
</thead>
</table>
| **Provide the affordable housing and let the tenants get on with life. The council has no expertise and no responsibility for social engineering**  
- Sadly people will have to fund their care as they get older – the taxpayer cannot afford it  
- More emphasis on young people as well as old  
- Note the move away from a tenancy for life  
- Be more specific about the impact of welfare reform  
- Pay to Stay is a threat  
- Risk of older people losing their home because of interest-only mortgages and reduced income after retirement | **The Council believes that it is in a good position to help people who contact via the housing service. We have taken action to provide early help through the Hub to those who need it by supplying working space for partner organisations at South Norfolk House. This helps joint working. We firmly believe that this approach saves money in the longer term, and helps individuals.**  
| People affected by the type of specific problems mentioned can be helped in appropriate ways. |

| Community | The Council has a Community Capacity Team – e-mail: communities@s-norfolk.gov.uk which seeks to help communities to benefit their residents.  
- There are various ways in which the Council can help local initiatives, and anyone interested is invited to contact the team. |
|---|---|
| **We are hampered by poor modern communications methods**  
- Investment needed in community initiatives  
- Community is important  
- You cannot make communities  
- Not every householder wishes to be part of a community  
- SNC fails to listen to communities  
- Pushing younger people to larger villages, towns and cities has resulted in decline of our rural communities  
- Encourage older people who are fit to look after those who are less able  
- Involve individuals  
- Openness and honesty [are required]  
- Funding is needed to encourage volunteers  
- Early intervention – savings for police | We note the various suggestions. |

<table>
<thead>
<tr>
<th>Providing help</th>
<th>As a strategic authority, South Norfolk Council believes it is</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effective communication – many people still do not</strong></td>
<td><strong>Effective communication – many people still do not</strong></td>
</tr>
</tbody>
</table>
have access to the internet
• Need fast internet available to all
• How to get people to ask for help as soon as they need it
• Target support at specific groups – mental health, learning difficulties
• Support or people with homes who find money managing a problem
• Floating support and family interventions very useful
• A single point of help is needed if the possibility of tenancy failure is identified
• Early help for any ‘family’ – not just those with children
• Some need financial support to live independently
• Collective buying of oil would help with affordable warmth
• Encourage befriending

| Organisation | Buy-in from partners is needed to promote independent living
|             | Not sure how the council can impact effectively under current economic constraints
|             | Can County Council budgets cover care costs? The impact of cuts
|             | More funding into existing services
|             | Further integration with health, care, stakeholders and 3rd sector providers
|             | Greater emphasis on cost savings of services
|             | Clear monitoring arrangements needed
|             | Set targets for falls reduction

The Strategy is explicit that joint working is essential. The limited finance available to provide support does cause problems, but the various organisations mentioned all have specialised knowledge and abilities.

Monitoring is important. The Council also funds and commissions help, such as through Citizens Advice. Contracts include the monitoring of outcomes.

The Action Plan sets targets to measure the achievements of intervention.

Prospering in it

| Issues | [Generally] it is not the job of the Council to |
|        | We acknowledge the view of some people that it is not the |
interfere with how people live their lives … but [to aid] the vulnerable … listen, look and learn what they may require
- People have to take responsibility for their own wellbeing – unless they can’t, then the community should pull together
- People deserve safety and a chance in life whatever their background
- I have no understanding of what “achieve potential” has to do with housing policy – it seems much more in the area of education, training and meaningful employment
- A sense of self and home is important for a multitude of people but in particular those with mental health conditions
- Be aware of potential rent arrears when rent is paid through Universal Credit

| Community     | More social engineering NO
Develop communities through outreach services
Each village needs a representative to listen, support and respond in a timely manner | We believe that 'helping people to help themselves' is not 'social engineering'. Similarly, the Council encourages communities to facilitate mutual assistance. |

| Solutions     | Improve digital isolation
[Helping ‘prospering in it’] is what councils should have done in the last 40 years
Prevention is better than cure
Be clever at identifying what is really going wrong and fixing that
A mix of support services may be needed but not for everyone all the time
Access to good quality information, e.g. financial capability / debt management / employability / advice on benefits
Focus on the lowest earners and most vulnerable
…a voluntary fund so that wealthier inhabitants of South Norfolk could contribute extra, with Gift Aid? | We agree that early intervention is best, and the work of the Early Help Hub is included in the Action Plan. The joint working within the Hub should help to identify the real problem, and provide rapid access to whichever organisation is best-placed to engage with the customer and agree on the way forward.
This specialist help is provided on a one-to-one basis, which can help with financial advice, healthy lifestyle, work skills etc.
Referrals can come from any agency, and publicity is intended to encourage direct contact. |
| Organisation | One to one contact instead of letters  
Include healthy eating and healthy lifestyles  
Can the strategy be more proactive about getting people into jobs?  
[...]this part of the document is quite interventionist only] this section inspires confidence  
Early intervention and sharing of information should prevent more expensive problems that are harder to fix  
Greater inter-agency co-operation is needed  
[appropriate partner organisations] have specialist knowledge and specific skills  
No one organisation covers and knows about everything  
[work with other organisations is necessary] because SNC clearly do not have a clue themselves  
...wholly reliant on other organisations working toward a shared aim  
...multiple agencies [might be needed to solve] housing problems  
Improve policing and social care  
...healthy recreation for young people  
Regular communication  
Agencies [should] link up and co-ordinate services  
Possible business start-up via specialist agencies  
Measure outcomes by monitoring the number of 'crises' before and after actions |
| We have emphasised the links to employment in the Strategy and the Action Plan.  
We acknowledge that the approach is interventionist, but it is based on evidence that not all residents are able to solve their own problems. We would not seek to impose intervention unless there were issues which required referral to, for instance, Children’s Services.  
Partnership working does require good understanding, effective communication and agreed purpose. We believe that the Hub is the best way to achieve this.  
Specialist advice can be facilitated by the contacts available within the Hub.  
The Action Plan sets targets to measure the achievements of intervention. |
### General feedback

<table>
<thead>
<tr>
<th>Issue</th>
<th>Representative Comments</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communication</td>
<td>• Fails to communicate key issues: how many houses are required, what type, how will SNC deliver this. &lt;br&gt;• Need to communicate to ensure success &lt;br&gt;• People won't buy in because they haven’t been asked about their needs &lt;br&gt;• Would like to be kept informed of the success of the strategy</td>
<td>The Strategy discusses the key themes but key issues such as identifying the numbers and types of homes required and how this will be met will be established through ongoing assessment. &lt;br&gt;The Action Plan identifies how we will work with communities to identify need. &lt;br&gt;The Action Plan will be reviewed and updated on an annual basis and details of this will be on the South Norfolk Council website.</td>
</tr>
<tr>
<td>Partnership working</td>
<td>• List parish councils in table of partners, they are the eyes and ears partners in local needs schemes &lt;br&gt;• List all early help partners &lt;br&gt;• Will partners named in the strategy “own it”? &lt;br&gt;• Can working relationships with other authorities be improved</td>
<td>Parish Councils are key partners and have now been included in the list of partners. &lt;br&gt;Key early help partners have been listed within the document. &lt;br&gt;Communities and partners will be encouraged to take ownership of the strategy and SNC will work closely with partners to support this.</td>
</tr>
<tr>
<td>Quality of strategy and language used</td>
<td>• A poorly written document. Lacks meaningful content &lt;br&gt;• Fairly broad which is positive &lt;br&gt;• Good intentions but fails to make commitments &lt;br&gt;• Structure the strategy on the basis of need, supply and gaps. &lt;br&gt;• Document written to avoid measurable actions &lt;br&gt;• You need to be clearer about what you mean by the various groups mentioned &lt;br&gt;• Inconsistent use of terms &lt;br&gt;• Laudable but general aims</td>
<td>The document has been written for a variety of readers and seeks to be inclusive. Further content of delivery of the aims forms the basis of the Action Plan. &lt;br&gt;The delivery of this strategy will based on need and measures for identifying this are outlined in the Action Plan. &lt;br&gt;The term resident was chosen to describe the people of South Norfolk in the majority of cases. When discussing a person using a particular service we have used the terms customers or clients to identify that we are talking about the people receiving the service as opposed to the general public. &lt;br&gt;The Strategy does contain general aims; these are picked up in detail within the Action Plan.</td>
</tr>
</tbody>
</table>
| National context and external barriers | • I don’t see anything that looks at this within a national context  
• Challenges faces in funding and service infrastructure  
• Lack of funding and staff may prevent partners from delivering  
• What impact will financial constraints have? | In light of recent policy developments, page 9 of the strategy (where it fits nationally) has been updated. SNC acknowledges that there are challenges for partner agencies. SNC will work closely with partners and communities to develop capacity within to ensure the success in a challenging environment. |
| Local context | • One size fits all approach does not reflect housing concerns in our parish.  
• Parish plans have not been taken into account  
• An expectation that parishes will provide or pay for services that other agencies cannot afford to deliver.  
• Whilst the priorities are important you have not fully considered the impact on local people, service and infrastructure.  
• To be effective the strategy must consider the local need | The strategy seeks to be consistent across the District but different parishes will have different needs. The individual actions within the strategy will be implemented with a local context and with involvement from local communities. We are aware of Parish Plans and will work closely with Parish Councils on issues relating to their area.  
There is no suggestion in the Strategy of expecting parishes to cover funding shortfalls in housing services. SNC will work closely with communities to build capacity to provide support locally.  
The impacts on local people, services and infrastructure are evaluated for each development through the planning process. |
| Feedback and monitoring success | • Ask for feedback from parish councils, community groups and residents, revisit regularly  
• Nothing on which to hold SNC to account  
• You need to be have clearer measures of success  
• I don’t have confidence in the self-measurement of any strategy  
• Document is written to avoid measurable outcomes | SNC will continue to engage with Parish Councils, community groups and residents on all issues, including housing.  
The individual objectives for this Strategy are contained within the Action Plan. The effectiveness of the Strategy will be measured against these. |
| Suggested measurements of success | • More homes, better services and community engagement  
• Social mobility index  
• Crime figures  
• Better homes | These are noted and a number of measurements are now contained within the Strategy |
- Ask people for their feedback
- Allow scope for more qualitative evaluation
- Decrease in problems, measure savings

### Resourcing

- Where will the finances and man power be found to implement the strategy?

The Strategy seeks to improve current practices and improve partnership working. As such its success will not necessarily rely on new resources. The Action Plan identifies actions which will require additional resources.

### Consultation process

- the inherent anonymity of the process does raise questions about how robust your consultation will appear
- if there are particular local concerns which the strategy may need to reflect, your current process will not identify them

There are challenges raised through the anonymity of the survey and this does make it difficult to respond directly to individual comments on specific issues. Using an anonymous survey has, however, allowed people to put forward their views with confidence and it means we were able to consider each comment objectively. Where people had particular issues that they wished to raise, contact details for the Housing and Public Health Partnerships Team were contained within the Strategy; this allowed more detailed feedback to be provided. A number of organisations chose to feed back in this way.

### Changes made to Strategy

As a result of the consultation process and responses discussed above a number of changes have been made to the Housing Strategy. The changes made could not reflect all feedback as there was not necessarily consensus among respondents as to what was required in the various aspects of the strategy. There has been a conscious effort to keep the Strategy as a succinct, concise and easily understood framework for housing activity. There has however been a determination to include as many suggestions from respondents as appropriate within the Action Plan that accompanies the strategy and provides more detail on how the Strategy will be implemented. The table below details the changes that have been made to the Draft Strategy document as discussed in the responses section above.

<table>
<thead>
<tr>
<th>Issues raised</th>
<th>Changes made to the Housing Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Providing it</td>
<td></td>
</tr>
<tr>
<td>Clarity was needed on the various groups mentioned within the Strategy in relation to</td>
<td>We have amended the Strategy to refer more clearly to the needs of various groups of people, including those with special needs and local people.</td>
</tr>
<tr>
<td><strong>h*ousing need</strong></td>
<td></td>
</tr>
<tr>
<td>------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Accessing it</strong></td>
<td></td>
</tr>
<tr>
<td>The Accessing it section did not previously include issues around homelessness.</td>
<td>We have made homelessness an aspect of Accessing it – previously it was only in prospering in it. The Action Plan also reflects this.</td>
</tr>
<tr>
<td>The Accessing it section needed further detail around helping people access a home.</td>
<td>The Housing Strategy has been amended to highlight the importance of obtaining a home in which to live and prosper. The Strategy and the Action Plan have been amended to emphasise this in relation to access to all tenures.</td>
</tr>
<tr>
<td><strong>Living it in</strong></td>
<td></td>
</tr>
<tr>
<td>The importance of partnership working and early interventions was raised</td>
<td>More emphasis on importance of Early Help within the ‘living in it’ section.</td>
</tr>
<tr>
<td><strong>Prospering in it</strong></td>
<td></td>
</tr>
<tr>
<td>The prospering in it section did not make reference to employment and training in allowing people to prosper.</td>
<td>The Prospering in it section of the Strategy has been amended to include the issue of employment and training and the Action Plan has been updated accordingly.</td>
</tr>
<tr>
<td><strong>The strategy as a whole</strong></td>
<td></td>
</tr>
<tr>
<td>The list of partners was not fully inclusive</td>
<td>Parish Councils and Early Help partners added to list of partners within the Strategy.</td>
</tr>
<tr>
<td>The details in the strategy of the national picture needed updating following policy developments since the draft was written</td>
<td>The section of the Strategy relating to the wider national picture has been updated to include more detail in light of recent policy developments.</td>
</tr>
<tr>
<td>Current trends were not specific enough in the draft document</td>
<td>Current trends affecting social housing are now set out more clearly in the strategy, and the intention to keep Home Options under review is in the Action Plan.</td>
</tr>
<tr>
<td>A number of respondents wanted further detail on delivery aims identified in the strategy and a number also suggested action points</td>
<td>Each section of the Strategy has been expanded in detail through the Action Plan. A number of suggested actions raised by respondents have been included within the Action Plan.</td>
</tr>
</tbody>
</table>
Conclusion

The consultation has resulted in a substantial number of responses which highlight the importance of housing in the District and underline the need to get this Strategy right. There has been a wide range of both positive and critical feedback on the draft Housing Strategy. This feedback has been used to develop and amend the strategy, including a greater reference being made to national challenges and improving the Accessing It section to include a greater emphasis on what can be done to help people access a suitable home. A number of respondents made reference to how we will establish need at a district and local level and how we will measure and monitor the success of the Strategy. Accordingly the Action Plan has been designed to provide a detailed framework and recording mechanism for delivery of the Strategy. The majority of respondents were supportive of the key priorities of the strategy and the aims contained within. With the added clarity from the Action Plan it is felt that the strategy can be an effective tool for delivering on the housing needs of South Norfolk.
Greater Norwich Homelessness Strategy

Report of the Housing and Public Health Partnerships Officer
Cabinet Member: Councillor Yvonne Bendle, Wellbeing and Early Intervention

CONTACT
Liam Pickering
lpickering@s-norfolk.gov.uk
1. Introduction

1.1. This report presents to Cabinet the Greater Norwich Homelessness Strategy (Appendix A). The Strategy underpins local delivery of homelessness services, homeless prevention services and approaches to address and avoid homelessness across the South Norfolk Council, Broadland District Council and Norwich City Council areas until 2020. It recognises the wider determinants and effects of homelessness and its impacts on individuals and communities’ health, wellbeing and prosperity. It seeks to address these issues through a holistic approach to homelessness services.

2. Context

2.1. South Norfolk Council is in a strong position with regard to homelessness services and prevention activity:

- There is strong performance in delivering early preventative measures to avoid homeless cases.
- Homeless applications are completed well within the required timeframes.
- An early intervention approach exists that seeks to address the wider issues a person faces before homelessness becomes an issue.
- A culture of continuous analysis and improvement of services helps ensure best practice.

2.2. This is the third consecutive Homelessness Strategy for the Greater Norwich area and as such, it seeks to build on the strong foundation of delivery from the previous strategy and improve things further.

2.3. It identifies the current provision and processes in regard to homelessness services as well as the challenges each district needs to address. It is recognised that whilst each locality area has its own priorities and challenges it has many
common issues too. Therefore the Strategy has been used to develop locality-based Action Plans in terms of service improvement and delivery.

2.4. As well as the Council’s partners Broadland District Council and Norwich City Council, the relevant Clinical Commissioning Groups have also been involved in the development of the Strategy. The development of the Strategy has also been informed by consultation with key stakeholders across the districts concerned. This included a workshop for partners within South Norfolk in September 2014 and a formal consultation period between November 2014 and January 2015.

2.5. The Strategy and Action Plan were considered by Members of the Housing, Wellbeing and Early Intervention Policy Committee on the 23rd November 2015 and their comments have been incorporated.

2.6. The Strategy will contribute to the delivery of the proposed new corporate priorities:

- **Place, Communities and Environment:** Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages - a reduction in homelessness and the associated issues will have a positive impact on the quality of life for residents and communities of South Norfolk.

- **Health, Well-being and Early Help:** Proactively working with communities to provide help at the earliest opportunity and enhancing the health and wellbeing of our residents - by taking a community based approach to the prevention of homelessness and recognising the relationship between homelessness and health and wellbeing.

- **Economic Growth, Productivity and Prosperity:** Providing the conditions to stimulate growth, productivity and prosperity sharing the benefits of growth with our communities - by providing people with the opportunities for further support and access to employment, education and training and reducing the costs associated with homelessness.
3. Better outcomes

3.1. The Strategy represents an opportunity for South Norfolk Council to build on its strong foundation of preventing homelessness and support for people facing becoming homeless and to improve its approaches to addressing trends in homelessness levels.

3.2. Some of the key outcomes as a result of the last Strategy include:

- During a time when presentations to the Council for assistance have increased, we have kept preventions and homelessness applications at a stable level by investing time to work with customers at an early stage to prevent their circumstances worsening.
- Working closely with SOLO Housing, we have built on the success of the lodgings scheme we fund and SOLO have increased the number of landlords engaged in the process, enabling more people to benefit.
- We have introduced a bond scheme, to assist customers to access the private rented sector to meet their housing requirements.
- Since 2012 we have been building on our bespoke choice based lettings system, and have tailored it to meet local need more effectively.
- We have utilised income from the Single Homelessness Prevention Fund, to enable us to be more innovative and creative in finding solutions to avert crisis.
- We are part of a local authority and Children Services partnership with YMCA who deliver Nightstop Plus. This provides short term emergency accommodation for young people with volunteer hosts in a supportive family environment, while family mediation and/or other housing solutions are explored.
• We have access to supported lodgings that are specifically for young people, provided and managed by YMCA.
• We ensure that homeless households moving into temporary accommodation in the area are given a support plan to identify other needs which help that individual or family get on in life, such as in employment and training, and/or health and wellbeing.
• Our housing enabling is responsive and flexible, allowing us to meet local need. In recent times the increased demand for 1 bedroom properties has been met through effective negotiation and planning.
• We have introduced a local connection to the area by virtue of employment and provision of or need for care and support. This offers opportunities for growth in the district by encouraging skilled workers into the area to support business. Enabling people to move based on care need allows people to access the support they need without reliance on public services or those which come at a high cost to them and to services.
• We have restructured our services to ensure that specialist advice is available for all customers when they request it and at the earliest opportunity. We have increased accessibility of specialist housing advice services, which has ensured that we are able to provide appropriate and holistic advice, help more people and prevent more homelessness than ever before.
• We continue to work closely with our Revenues and Benefits team to provide a more unified service for customers help with their rent. All parties (including the customer) agree to work together to secure the temporary funding necessary for stability through Discretionary Housing Payments (DHP) while we provide the debt and housing advice required. This approach ensures that the customer progresses in terms of debt and/or alternative housing for the duration of the DHP award rather than reaching the end of the award and being no further on.
• We continue to deliver increasing numbers of affordable homes year on year. Whilst identifying changing demand and meeting it, by working with developers to ensure that the homes built are addressing needs in the district.
4. Challenges

4.1. So as to ensure the best sustainable outcome for people at risk of being homeless, we propose continue to improve the housing and homelessness services we offer whilst ensuring they are both cost effective and provide clients with the best outcome possible. There are a number of challenges relating to South Norfolk that the Strategy seek to address. These are identified in paragraph 5.5.3 of the Strategy and include:

- Ensuring we work effectively and in a timely manner with partners so the risk of homelessness is identified at an early stage.
- Addressing the use of B&B to accommodate homeless households and to improve the quality and reduce the cost of the temporary accommodation service.
- Maintaining a properly regulated private rented sector where landlords are encouraged and supported to provide good quality homes to local residents.
- Understanding the impact on health and wellbeing of homelessness to individuals and services.
- A shortage of appropriately sized homes across all tenure types.
- Ensuring effective use of temporary accommodation, providing transitional shelter between homelessness and sustainable accommodation.
- Ensuring customers can regain and maintain independence.

4.2. Further to these challenges the Strategy also identifies the wider factors that will impact on our ability to tackle homelessness.
5. How will the Strategy make a difference?

5.1. The Strategy is underpinned by the need to collaborate on issues. It has been written with the other districts within the Greater Norwich area as it is recognised that no single district within this area will be able to address the challenges without collaboration from the other districts. The method adopted will allow each individual to address the issues most relevant to their area whilst also addressing the wider cross-district challenges.

5.2. The Strategy also recognises the need to work in partnership with key stakeholders, communities and service providers to deliver against the challenges.

5.3. Central to the function of this Strategy is a continued focus on prevention and early intervention. It recognises the vital interconnectivity between this Strategy and each district’s related strategies. In the case of South Norfolk these being: the South Norfolk Housing Strategy, Norfolk joint Health and Wellbeing Strategy and South Norfolk Council’s own Health and Wellbeing Strategy.

5.4. The Strategy takes account of the factors that impact the likelihood of homelessness and the wider effects homelessness has on the health, wellbeing and prosperity of individuals and communities. The actions within the strategy seek to address these issues through a holistic approach.

6. Action Plan

6.1. A working Action Plan has been prepared with input from the Housing Well-being and Early Intervention Policy Committee to address the challenges laid out in the Strategy through a series of detailed tasks and actions which relate to each of the four priorities:
• **Targeting our resources at those who are most at risk of homelessness** - within a South Norfolk context this includes supporting our early help partners, supporting people into employment to prevent homelessness and working to address the links between mental health and wellbeing and homelessness.

• **Helping people find affordable, safe good quality housing** - by providing training to private sector landlords to improve the capacity of the private rented sector, delivering the affordable housing policy set out in the local plan and reviewing the home options scheme to ensure customers are able to secure housing that meets their needs.

• **Working together better with partners, so that we can work in a co-ordinated way to prevent homelessness** - within a South Norfolk context this includes: evaluating the effectiveness of move on contracts; updating our website to enable partners and customers to access information easily; and developing a protocol in partnership with social housing providers to reduce the likelihood of eviction. Within the wider Greater Norwich context this will involve: working to promote better access to health service for people who are homeless or at risk of homelessness; analysing the gaps in homelessness prevention education; districts working together on bids for funding that helps towards preventing homelessness; and strengthening the evidence base of the health needs of people who are homeless.

• **Helping people develop independent living skills, maintain or regain their independence to reduce the risk of someone becoming homeless in the future** - by assisting owners, tenant and landlords to make adaptations or find suitable alternative accommodation; reviewing Integrated Early Intervention Services to assess the impact on reducing demand on acute services; and working with South Norfolk CCG to develop and deliver an enhanced service to assist people affected by dementia to live independently in their home.

6.2. In addition officers will be working with colleagues in Norwich and Broadland to deliver those actions identified as needing a Greater Norwich Homelessness Partnership (GNHP) response.
7. Risks and Implications arising

7.1. Financial – no direct implications in creating the Strategy, but the Council’s expenditure, decided within the annual budget-setting process, will provide the opportunity to fund in innovative ways while taking account of resources available.

7.2. Environmental – none identified.

7.3. Equalities – the Strategy seeks to help people who are disadvantaged, thereby improving their opportunities.

7.4. Crime reduction – early interventions and addressing individuals support needs and wider societal needs through work with key stakeholders and service providers should reduce the amount of crime.

8. Recommendation

8.1. That Cabinet:

- Approves the Greater Norwich Homeless Strategy 2015-20 and
- Supports the development of the Homelessness Strategy Action Plan as a working document to deliver the Strategy.
## Greater Norwich Homelessness Strategy 2015-20

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<td>9.</td>
<td>Glossary of terms</td>
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</table>
1. Introduction

This document sets out a new collaborative approach to tackling homelessness in Greater Norwich over the next five years; bringing together local authority partners, housing agencies and health organisations in a new strategy.

The strategy sets out to protect everyone at risk of homelessness in the Broadland, Norwich and South Norfolk council areas.

An early help approach has been shown to prevent homelessness. Together we can expand on this approach, not only to prevent homelessness but also to achieve wider outcomes such as improved health and wellbeing, and better job opportunities. Taking support opportunities is important in helping young people and families to achieve more along their pathway in life. There is a huge opportunity for partners to deliver services in different, co-ordinated ways so that a ‘no wrong door’ approach delivers outcomes that meet customer needs.

This strategy builds on a range of early intervention measures addressing the wide reaching causes of homelessness as the planning and commissioning of effective healthcare services is viewed as a crucial element in providing effective support. It has involved partnership working with health and social care commissioners, Norfolk County Council and the Norfolk Community Health and Care NHS Trust, and NHS City Reach.

Each local authority has its own actions within the overall strategy to address specific needs and a number of joint actions because Greater Norwich is a hub for employment, healthcare and homelessness services, so a joined up approach involving a range of agencies is needed to collectively tackle homelessness issues across the whole area.
1.1 Purpose of this document

Context

The Homelessness Act 2002 requires Local Authorities to produce a homelessness strategy that applies to everyone at risk of homelessness, not just people who may fall within a priority need group for the purposes of Part 7 of the Housing Act 1996.

A new strategy is needed that is relevant to the needs of the three councils in the Greater Norwich area: Broadland, Norwich and South Norfolk.

Work started on the formation of a strategy in January 2014 through the project team, which will be responsible for the formation and delivery of the strategy. Its membership comprises the following organisations:

- Broadland District Council
- Norwich City Council
- South Norfolk Council
- Local Clinical Commissioning Groups
- City Reach NHS

1.2 Data sources in the formulation of the strategy

The project group considered the following during the preparation of the draft homelessness strategy:

- homelessness review, trends and issues, both quantitative and qualitative;
- national and local policy, current and proposed;
- analysis of the outcomes of the previous Homelessness Strategy Action Plan 2011-14
- In South Norfolk partner organisations and internal team members were invited to share their thoughts on recent achievements, challenges for the future and suggestions for future actions during a number of drop in sessions in early September
2. Context and purpose

What do we mean by homelessness?

Definition of homelessness for the purpose of this strategy:

Those households who are defined as statutorily homeless within the Housing Act 1996 and Homelessness Act 2002. These are likely to be families with dependent children, pregnant women and adults who are assessed as vulnerable. (This definition of homelessness is relatively narrow and does not constitute the majority of homelessness cases).

Those households who do not fall into the above categories (sometimes called ‘non-statutory’ homeless) and are likely to be single or couples (with no dependents) who are either sleeping rough, living in supported accommodation or are deemed as “hidden homeless” and are typically sleeping on friends or family member’s sofas as a temporary stop gap measure.

2.1 Coverage
This strategy covers the three district authority areas of greater Norwich including: Broadland, Norwich and South Norfolk. This is the third consecutive sub-regional homelessness strategy.

2.2 Statutory requirement
The Homelessness Act 2002 imposes a duty on local housing authorities to carry out a homelessness review in their area and formulate and publish a homelessness strategy based on its results at least every five years.

A homelessness strategy is defined in Homelessness Act 2002 s3(1) as one formulated in order to:

a) prevent homelessness in an authority’s area;
b) secure accommodation is and will be available in that area for people who are or may become homeless; and
c) provide support for such people or those who have been homeless and need support to prevent it recurring.
Greater Norwich Homelessness Strategy 2015-20

3. Where do we want to be?

Our vision:

“Greater Norwich is a place where agencies work together to support people who are, or may become homeless. Helping people to take control of their own circumstances earlier and stopping them from becoming homeless will be our main aim. This will provide people with a firm platform where their health and wellbeing, employment or training opportunities are either maintained or improved.”

We aim to do this by focusing on these priorities:

- targeting our resources at those people who are most at risk of homelessness.
- helping people find affordable, safe, good quality housing.
- working better together with partners, so that we can work in a co-ordinated way to prevent homelessness.
- helping people develop independent living skills, maintain or regain their independence to reduce the risk of someone becoming homeless in the future.

4. How will we get there?

The following priorities and supporting actions are drawn from the findings of the greater Norwich homelessness review and consultation exercise with stakeholders.
Greater Norwich Homelessness Strategy 2015-20

Priority one: Target our resources at those people who are most at risk of homelessness

<table>
<thead>
<tr>
<th>Broadland Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Seek earlier and more cost effective interventions through effective partnership working.</td>
</tr>
<tr>
<td>b. Use Systems Thinking to continue to analyse demand on the service and respond flexibly to changing needs.</td>
</tr>
<tr>
<td>c. Explore opportunities for joint commissioning of services across disciplines.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Norwich Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Improve data collection so we can capture ‘real’ time measures of homelessness.</td>
</tr>
<tr>
<td>b. Carry out a dip sampling exercise to measure effectiveness of prevention measures.</td>
</tr>
<tr>
<td>c. Increase the numbers of people at risk of homelessness to stay in their own homes through increased tenancy enforcement/relations with landlords in the private rented sector.</td>
</tr>
<tr>
<td>d. Work with our partners in Children Services to improve pathways for young people leaving care.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>South Norfolk Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Provide training and support for partners in the Early Help Hub ensuring that an appropriate level of multi-agency support is available to customers at an early stage to reduce the risk of financial difficulty leading to homelessness.</td>
</tr>
<tr>
<td>b. Increase the opportunities for customers who are unemployed to enter or regain employment at the earliest point to prevent homelessness by reviewing commissioned services outcomes and ensuring service level agreements are fit for purpose.</td>
</tr>
<tr>
<td>c. Introduce a housing pathway for mental health clinicians.</td>
</tr>
</tbody>
</table>
Greater Norwich Homelessness Strategy 2015-20

Priority two: Helping people find affordable, safe, good quality housing.

<table>
<thead>
<tr>
<th>Broadland Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Monitor the effectiveness of the Broadland District Council private sector leasing service and explore opportunities to further develop the service.</td>
</tr>
<tr>
<td>b. Increase access to supported provision for Broadland clients.</td>
</tr>
<tr>
<td>c. Explore opportunities to improve clients financial capacity skills and improve access to pre-tenancy training.</td>
</tr>
<tr>
<td>d. Introduce a proactive identification and inspection process for HMOs to ensure they meet safety standards, and take appropriate action where they fall short of required standards.</td>
</tr>
<tr>
<td>e. Continued support of the development of the housing element of the Leaving Care Service for Norfolk.</td>
</tr>
<tr>
<td>f. Maximise delivery of affordable homes.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Norwich Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Explore the need for a lodgings scheme for people with low support needs.</td>
</tr>
<tr>
<td>b. Increase the number of private landlords willing to let to households who are in receipt of housing benefit.</td>
</tr>
<tr>
<td>c. Consider the feasibility of a cashless bond scheme for deposits in the private rented sector.</td>
</tr>
<tr>
<td>d. Introduce the ‘gold standard’ for housing advice services.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>South Norfolk Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Provide training to private sector landlords to improve the capacity of the private rented sector to meet housing need.</td>
</tr>
<tr>
<td>b. Deliver the Affordable Housing policy set out in the local plan.</td>
</tr>
<tr>
<td>c. Review the Home Options scheme to ensure customers are able to secure housing that meets their needs.</td>
</tr>
</tbody>
</table>
Priority three: Working better together with partners, so that we can work in a co-ordinated way to prevent homelessness.

<table>
<thead>
<tr>
<th>Greater Norwich Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Work to promote better access to health services for people who are homeless, or at risk of homelessness.</td>
</tr>
<tr>
<td>b. Conduct a gap analysis of homelessness prevention education delivered through schools, colleges and youth organisations.</td>
</tr>
<tr>
<td>c. Where appropriate, we will work together on bids for funding that help towards the prevention of homelessness.</td>
</tr>
<tr>
<td>d. Develop a stronger evidence base of the health needs of people who are homeless.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Broadland Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Improve access to education, training and employment for clients in housing difficulty.</td>
</tr>
<tr>
<td>b. Work with our statutory and voluntary sector partners to protect vulnerable people including young people and victims of domestic abuse from crime, to be safe and secure in their homes.</td>
</tr>
<tr>
<td>c. Continue to place emphasis on early intervention in order to prevent homelessness whenever possible.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Norwich Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Create a simple web based platform where our partners from statutory and voluntary sectors can share information and good practice.</td>
</tr>
<tr>
<td>b. Make best use of Norwich City Council stock through increased supported provision through partnership and lease arrangements.</td>
</tr>
<tr>
<td>c. Identify the pathway to homelessness of ‘chaotic’ individuals and seek to map and address this through increased partnership working.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>South Norfolk Actions</th>
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</thead>
<tbody>
<tr>
<td>a. Evaluate the effectiveness of our “move on” contracts and act upon any recommendations arising.</td>
</tr>
</tbody>
</table>
| b. Review and update our website to enable partners and customers to easily access the information and to contact us where
Greater Norwich Homelessness Strategy 2015-20

necessary.
c. Develop a protocol in partnership with housing providers to reduce the likelihood of evictions from social housing.

Priority four: Helping people develop independent living skills, maintain or regain their independence to reduce the risk of someone becoming homeless in the future.

<table>
<thead>
<tr>
<th>Broadland Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. We will support the development, implementation and review of multi-agency strategies and protocols which seek to address homelessness in a joined up manner.¹</td>
</tr>
<tr>
<td>b. Where appropriate seek a county-wide or sub-regional approach to funding bids, allocations and scheme support.</td>
</tr>
<tr>
<td>c. Strengthen partnerships and communication to improve pathways into accommodation which best meets client needs and to ensure services are in place so that that person is adequately supported and engaged moving forward.</td>
</tr>
<tr>
<td>d. Monitor and analyse sustainability outcomes.</td>
</tr>
<tr>
<td>e. Support and promote initiatives which take a community approach to developing solutions to issues predominantly facing vulnerable people in Broadland.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Norwich Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Support LEAP to ensure long term viability of the project and a community interest company to offer opportunities to clients.</td>
</tr>
<tr>
<td>b. Seek partnership arrangement between Children services and Let NCC to address housing issues for intentionally homeless families and break the chain of causation.</td>
</tr>
</tbody>
</table>

¹ For example the North Norfolk Youth Homelessness Protocol and the Intentionally homeless families protocol.
<table>
<thead>
<tr>
<th>South Norfolk Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Where properties do not meet customer need assist the owners, tenants and landlords to make adaptations or find alternative, suitable accommodation.</td>
</tr>
<tr>
<td>b. Review Integrated Early Intervention services such as Care &amp; Repair and Handyperson to assess the impact they are having on reducing demand on acute services.</td>
</tr>
<tr>
<td>c. In partnership with the CCG develop and deliver an enhanced service to assist people affected by Dementia to live independently at home.</td>
</tr>
</tbody>
</table>
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5. Strategic framework for the strategy

- Broadland corporate plan
- Norwich corporate plan
- South Norfolk corporate plan

- Broadland housing strategy
- Norwich housing strategy
- South Norfolk housing strategy

- Greater Norwich homelessness strategy 2015-20

- Greater Norwich single homelessness strategy 2015-20

- Broadland action plans
- Norwich action plans
- South Norfolk action plans
5.1 Our role in health and wellbeing

All local authorities (county and district) have a general statutory duty to protect and improve health and wellbeing and to tackle inequalities and the ‘social determinants’ of health – that is, those aspects of people’s social and economic condition that impacts on their health. Extending far beyond social care from education to housing, economic development to leisure services, planning to trading standards, they all have a significant impact on people’s health.²

In particular District authorities have a significant function and role in helping improve people’s health and wellbeing through the homeless prevention work we do. Examples of these activities include:

- the function of our housing options teams in helping vulnerable people find (or keep) safe and secure good quality housing,
- direct provision of permanent and temporary housing including, employment and training services such as LEAP,
- direct and joint commissioning of services to help reach out to vulnerable people who are either young, rough sleeping or fleeing domestic abuse.
- helping troubled families through our family intervention projects,

² Page 3, “A Councillor’s guide to the health system” (Local Government Association, May, 2014)
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- helping people stay in their own homes through grants and adaptations to help them live more independently,
- improving the quality of private sector housing for people,
- developing protocols with statutory and voluntary providers such as the:
  - Homeless person’s hospital discharge protocol
  - Hostel eviction protocol (“Off the street”)
  - Joint Protocol to address the needs of homeless young people in Norfolk
- the continued refreshment of the JSNA so that it remains relevant and highlights the impact our work in improving people’s health and wellbeing.

The above activities are just some of the work that we do that has a direct or indirect impact on a person’s health and wellbeing and can show savings to the overall health budget. A recent study showed that “the annual cost of unscheduled care for homeless patients is 8 times that of the housed population.” Despite this expenditure the average age of death of a homeless patient is 47. In comparison to the housed population, the homeless are five times more likely to present at A&E, are admitted 3.2 times more frequently and stay 3 times as long.

5.2 Key national policy changes since the last strategy

A number of key national policy changes have been introduced since the last strategy. The following section attempts to draw some of the main policy changes that have had a direct or indirect effect on homelessness in greater Norwich.

5.2.1 Coalition government housing strategy

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3 Cabinet Office Social Exclusion Taskforce, DOH, Inclusion Health- Evidence Pack 2010
Greater Norwich Homelessness Strategy 2015-20

In November 2011, the Coalition government released their Housing strategy, *Laying the foundations: a housing strategy for England*. The document acknowledged the challenges posed by homelessness, in particular rising statutory homelessness and rough sleeping.

The Coalition government then formed a Ministerial Working Group and published *“Making every contact count: A joint approach to preventing homelessness.”* The aim of the paper was to make sure every contact local agencies make with vulnerable people and families makes a positive impact on their lives by:

- tackling troubled childhoods and adolescence
- improving health
- reducing involvement in crime
- improving skills; employment; and financial advice
- pioneering social funding for homelessness

The paper also set ten local challenges that “should lead to all local homelessness teams delivering a gold standard service. The ten local challenges are:

1. Adopt a corporate commitment to prevent homelessness which has buy in across all local authority services
2. Actively work in partnership with voluntary sector and other local partners to address support, education, employment and training needs
3. Offer a Housing Options prevention service, including written advice, to all clients
4. Adopt a *No Second Night Out* model or an effective local alternative
5. Have housing pathways agreed or in development with each key partner and client group that includes appropriate accommodation and support
6. Develop a suitable private rented sector offer for all client groups, including advice and support to both clients and landlords
7. Actively engage in preventing mortgage repossessions including through the Mortgage Rescue Scheme
8. Have a homelessness strategy which sets out a proactive approach to preventing homelessness and is reviewed annually so that it is responsive to emerging needs
9. Not place any young person aged 16 or 17 in Bed and Breakfast accommodation
10. Not place any families in Bed and Breakfast accommodation unless in an emergency and then for no longer than 6 weeks

5.2.2 Localism Act 2011
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The purpose of the Act was to shift power from the state to local communities by:

- lifting the burden of bureaucracy
- empowering communities to do things their way
- increase local control of public finances
- diversifying the supply of public services
- opening up government to public scrutiny
- strengthening accountability to local people.  

5.2.3 Welfare reform

Against a background of financial constraints the coalition government introduced a number of changes through the Welfare Reform Act 2012. Some of these changes were the biggest seen since the introduction of the Welfare state in the 1940s, and include:

- measures to simplify the system
- more stringent rules and eligibility criteria
- stricter sanctions
- making work pay
- more frequent benefit entitlement assessments
- benefit rate freezes
- caps to some benefits
- loss of benefit uprating linked to actual costs
- increase in a range of deductions made to benefits
- new payment methods
- localisation of the social fund

5.2.4 Reduction in the value of working-age benefits

Greater Norwich Homelessness Strategy 2015-20

A significant number of the changes brought about by the Welfare Reform Act 2012 were made to reduce the value of working-age benefits for people who are on low incomes. These measures include:

- restricting the annual uprating of working age benefits to 1%
- introduction of the shared accommodation room rate for under 35s (this previously applied to under 25s)
- lowering the rates for Local Housing allowance (LHA)
- the Benefits Cap (60-70 families were affected by this in Norwich as of September 2013 by an average of £59.52 per week)
- means testing Child Benefit
- limiting contribution-based Employment Support Allowance
- the Social Sector Size Criteria (SSSC)
- replacing Council Tax Benefit (CTB) with Council Tax Support (CTS)
- restrictions on Working Tax Credits
- raising the deduction rate for non-dependents

Some of the above reductions have placed people in greater Norwich at further risk of homelessness. Research published by the DWP\(^6\) in 2014 showed that people affected by these reductions were spending less on essential household items, or moving to cheaper accommodation in alternative areas. This research is supported by the increase in the number of people accessing Norwich Foodbank. In October 2013, Norwich Foodbank reported a 67.29% increase (from 1,489 to 2,491) in the number of food vouchers issued during the same period the previous year.

5.2.5 Post July 2015 Budget\(^7\)

Since the July 2015 Budget there have been further changes introduced that will lead to a reduction in the value of working age benefits for a larger number of households than ever before; this follows on from the above changes and will be introduced either through the Welfare and Work Bill or by Statutory Instrument. Some of these changes include:

- removal of housing benefit to childless 18-21 year olds who are not working\(^8\)

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\(^6\) The Benefit Cap: Public Perceptions and Pre-implementation Effects (DWP,2014)

\(^7\) Benefit changes and distributional analysis (Institute for Fiscal Studies, 2015).

\(^8\) Certain exemptions will apply.
Greater Norwich Homelessness Strategy 2015-20

- the Benefit Cap lowered to £20,000 per year or £384.62 per week for families, £13,400 per year or £257.69 per week for single persons
- freeze of certain social security benefits and tax credits for four tax years
- removal of tax credit/universal credit entitlement for third and subsequent children from April 2017
- large reduction in how much families can earn before tax credits/Universal Credits start to be withdrawn (Tax credits start to be withdrawn once family earnings go above £3,850 rather than £6,420
- abolition of work related activity group (WRAG) premium in Employment Support Allowance (ESA) for new claimants (nationally, this equates to around a fifth of all ESA claimants who receive the £29 a week premium)\(^9\)
- changing support for mortgage interest from benefit to loan
- English social rents: cut in cash terms by 1% per year for 4 years (likely to have a negative impact on the building of new affordable homes)

5.2.6 Likely effect of July 2015 Budget on homelessness

With the exception of the reduction in social rents all of the above measures are likely to see increasing pressure on household budgets and potentially placing them at risk of homelessness. The next section highlights some of the main points we believe may have a direct impact on levels of homelessness in greater Norwich.

5.2.7 Removal of housing benefit for 18-21 year olds

It is unclear who will be exempt from this change. It is likely that a number of young people who do not meet thresholds of care (because they are over 17) will become homeless as a result, with no ability to claim help with their housing costs if they are unable to return home. It is also likely that when a young person has a break in their housing benefit claim that they will find themselves unable to claim help with their housing costs in the future.

5.2.8 Benefit Cap

The aim of the cap is to help incentivise families into work instead of relying on benefits. As with the previous cap it will hit housing benefit first as a total of household benefit income. It is likely to impact upon a number of families, especially those who have three

\(^9\) Benefit changes and distributional analysis (Institute for Fiscal Studies, 2015).
or more children who live in the private and social rented sector. As a result it is likely that we will see more families become homeless if they fail to find work or are unable to move into cheaper accommodation. Some of this impact may be temporarily mitigated by Discretionary Housing Payments (DHP), but this is only a temporary stop gap measure to help people in financial distress.

5.2.9 Freeze to Local Housing Allowance (LHA) rates

The plan to freeze LHA rates over the next four years to 2019 will mean that more private sector housing will become unaffordable for people accessing private sector housing who are in receipt of benefits. It is very likely that those households struggling to meet rent shortfalls will face higher arrears and a greater risk of eviction. The ending of Assured Shorthold Tenancies is one of the leading causes of homelessness in the country as a whole and in greater Norwich. There may be some short term help in the form of DHP but again this will only help temporarily protect households already in the sector. The Institute for Fiscal Studies have stated that this is equivalent to a 5% cut. Oxford Economics (in 2013) have predicted that private rented sector rents will rise by 39% from 2013-20 (across England). This will mean that increasingly the private rented sector will become unaffordable for people in receipt of LHA and will also prevent households accessing this sector.

5.2.10 Abolition of ESA WRAG premium

The following figures (as of November 2014) from the DWP show the number of ESA claimants who are in the WRAG premium group within greater Norwich. These people who are in receipt of ESA WRAG premium will not be affected until there is a break in their claim. Any new claimants or applicants waiting to be assessed from April 2017 will no longer be able to receive this premium.

<table>
<thead>
<tr>
<th>Local authority</th>
<th>Caseload</th>
<th>Unknown</th>
<th>To be assessed</th>
<th>WRAG</th>
<th>Support group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broadland</td>
<td>1,480</td>
<td>130</td>
<td>390</td>
<td>260</td>
<td>710</td>
</tr>
<tr>
<td>Norwich</td>
<td>3,570</td>
<td>140</td>
<td>1,070</td>
<td>740</td>
<td>1,620</td>
</tr>
<tr>
<td>South Norfolk</td>
<td>1,480</td>
<td>100</td>
<td>440</td>
<td>250</td>
<td>700</td>
</tr>
</tbody>
</table>

This cut is likely to have a negative impact on people who need extra income to help with their health condition (such as heating and transport costs) so they can live as independently as possible. The result will be that people in receipt of ESA will be expected to manage on the same level of benefit as their counterparts on JSA placing greater pressure on their household budgets and putting them more at risk of homelessness.
5.2.11 Legal aid changes

The Legal Aid, Sentencing and Punishment Act 2012 was introduced on 1st April 2013. The main aim of the Act was to reduce the legal aid bill by £350m a year in England and Wales. The Act removed funding for a number of areas of civil law including some debt, housing and benefit issues. Legal aid is still only available for debt and housing matters where someone’s home is at immediate risk; according to Norfolk Community Law Service “The East of England has lost approximately £3.3m worth of legal aid funding per year for social welfare advice.” Shelter (Norwich), have reported that before the cuts they were able to offer more holistic, preventative advice to clients, especially around ongoing housing and general benefit issues. Now clients can only be supported where their home is at immediate risk. There are also issues around people who fall outside the qualifying criteria for legal aid and may be earning too much but are unable to fund the costs of professional representation in Court. Nationally, it has been reported that there has been increasing evidence of individuals representing themselves leading to delays in court business overall.

5.2.12 Health and social care reform

The Health and Social Care Act 2012 introduced some of the biggest changes to the NHS since its introduction in 1948. The main focuses of the changes are around:

- structure
- accountabilities
- funding arrangements
- working arrangements

This led to:

- The Secretary of State no longer having a duty to provide health services through the NHS
- Strategic Health Authorities being abolished and replaced by a National Commissioning Board and a new body called Public Health England

Primary Care Trusts were abolished and replaced by:
Greater Norwich Homelessness Strategy 2015-20

- Clinical Commissioning Groups (CCGs) that are now responsible for commissioning most health services
- Local Authorities (Councils) taking a larger role in public health promotion requiring each local authority to undertake a Joint Strategic Needs Assessment (JSNA) before April 2013 and creating Health and Wellbeing Boards.

At a local level this led to the creation of:

- a Norfolk Health & Wellbeing Board (including the leaders of all of the district Councils of Norfolk & Waveney)
- transfer of public health and health improvement functions from the now defunct Primary Care Trust
- expansion of the (Upper tier authority) scope of the current health and social care scrutiny function; and
- the establishment of a local Healthwatch
- five CCGs in Norfolk: Norwich, West Norfolk, North Norfolk, South Norfolk and Health East (covering Gt Yarmouth and Waveney).
- within the greater Norwich area there are three CCGs namely: North Norfolk, Norwich and South Norfolk.

This major change saw 80% (£1.3bn) of the NHS Norfolk budget transfer to the five CCGs who will spend the majority\(^\text{10}\) of NHS funding for their local residents. The expectation of the Norfolk Health & Wellbeing Board is to require the CCGs to co-operate with the Board, and write commissioning plans which take account of the evidence of the JSNA and the priorities of the Norfolk Health & Wellbeing Strategy.\(^\text{11}\)

5.2.13 Health and Wellbeing

The three greater Norwich Councils recognise the significance of the links between health and homelessness particularly amongst single homeless people and the effect it has on families. We also recognise that we need to work together to achieve better outcomes for people who are affected by homelessness and ill-health. We know that if someone becomes homeless they are likely to “suffer significant health inequalities in comparison with people in more secure accommodation, in terms of both their health status and their ability to access health services…many health and social care professionals in the NHS, local authority services, the third sector, prisons and elsewhere have homeless people on their caseload.”\(^\text{12}\) We also recognise the direct relationship an

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\(^{10}\) With the exception of some services such as dentistry and

\(^{11}\) Cabinet, 23\(^{\text{rd}}\) January 2012, Item 12, NHS Reforms and Norfolk County Council Next steps towards establishing a Health and Wellbeing Board, and implications of legislation for scrutiny and Local HealthWatch.

\(^{12}\) Improving health care for homeless people, Section B The Homeless Health learning pathway, (The Queen’s Nursing Institute)
Greater Norwich Homelessness Strategy 2015-20

individual’s physical and mental wellbeing can have on their own housing situation if their health needs are not met. We know from research published by Crisis\textsuperscript{13} in July 2013 (for single homeless people):

- the average age of death for homeless people is 47
- up to 70% of homeless people have mental health issues
- around a third will have a history of problematic substance misuse
- homeless people are 40 times less likely to be registered with a GP compared to the general public
- homeless people are 13 times more likely to be a victim of violence.

5.2.14 Domestic Abuse

There have been considerable legislative changes between 2010 and 2014 which address the issue of domestic abuse and its negative impacts. This increases awareness of the issue.

It is a continual challenge to understand the true level of those affected by domestic abuse, and the impact that this has on homelessness.

The introduction of Multi-Agency Risk Assessment Conferencing and the DASH assessment form means that our approach to dealing with customers is more consistent and offers an opportunity for us to do effective action planning with the individual. This also helps the customer to measure their own risk levels, and minimise them. Locally we have seen a bigger commitment to MARAC and taking on the advice of Safelives to ensure that it is the most effective service we can have. We are looking much more closely at risks, which helps to build a robust action plan for the customer. There is a much broader attendance group, and as a result—the outcomes are much stronger and more sustainable. This ensures that homelessness is prevented and repeated victimisation is being reduced.

5.2.15 The introduction of the Social Sector Size Criteria (SSSC)

The introduction of the SSSC (opponents call it Bedroom Tax) was brought about primarily to reduce expenditure on Housing Benefit and to reduce under-occupation in the social sector. The scheme reduces Housing Benefit for social tenants (of working

\textsuperscript{13} Homelessness briefing, (CRISIS, July 2013)
Greater Norwich Homelessness Strategy 2015-20

age) with more bedrooms than their household requires. Those people affected have had their Housing Benefit reduced by 14 per cent for one spare bedroom and 25 per cent for two or more spare bedrooms. As of May 2014, 3,667 households were affected by SSSC in greater Norwich; the majority of those households have seen their benefit reduced by £10-15 per week.\textsuperscript{14} One of the main issues for people affected by this is that there are not enough ‘smaller’ homes available for them to downsize into leading to households being faced with cutting back on essential household items so they can make up the shortfall in their rental payments.

5.2.16 Incentivising Right to Buy

In October 2011, the Coalition government announced that they wanted to “raise Right to Buy discounts which will make the scheme attractive again and rejuvenate the housing stock.” Since this announcement in April 2012 the government increased the maximum cap on the discount to £70k. This maximum cap is being raised on an annual basis by CPI from April 2015. It is likely that these rises in discounts will mean that more Council houses are sold in Norwich. Over the five year period between 2008/09 and 2012/13 a further 230 homes were sold through Right to Buy. A further increase in the number of council homes sold could mean that the safety net of social housing is diminished further (especially for homeless people) if housing providers are not able to replace all of the homes (on a like for like basis) sold through right to buy.

5.2.17 Ending of mortgage rescue

The Mortgage Rescue Scheme was designed to support vulnerable owner-occupiers at risk of repossession to remain in their home. Since its inception in 2009 there have been 76\textsuperscript{15} successful mortgage rescues in greater Norwich (Broadland 45, Norwich 17 and South Norfolk 14). There were a number of unsuccessful applications due to non-engagement from the owner, costly repairs and properties’ value being above the scheme’s cap. As of April 2014, the government brought the scheme to an end which could mean more people become homeless in the future.

5.2.18 Interest-only mortgages

There is some concern that homeowners who took out interest only mortgages in the late 80s and 90s will struggle to find the necessary funds to repay the capital element of their mortgage when their mortgage term comes to an end. The Financial Conduct Authority estimates around 260,000 homeowners (10% of cases) whose mortgage matures before 2020 do not have a strategy in place to repay their mortgage at the end of its term.

\textsuperscript{14} May 2014, DWP Stat Xplorer (DWP).
\textsuperscript{15} We know that some of these cases have since been affected by the Social Sector Size Criteria (Bedroom Tax)
5.2.19 Discretionary housing payments (DHP)
DHP's have been used since 2001 to help low-income households who rent their homes meet their housing costs (in the short term). Since the advent of the Welfare Reform Act in 2012 they have been used to mitigate the effects of the reduction in welfare benefits. Cuts introduced mean that households have been left with gaps between their rent and housing benefit. The Government has increased the level of DHP funding to local housing authorities since June 2010 as a means of mitigating the effects of changes to housing support as part of the wider reform agenda. However, in 2015 the Government announced cuts to the DHP budget from £165m (in 2014/15) to £125m in 2015/16. Locally the DHP budgets for the three greater Norwich Councils for 2015/16 are as follows:

- Broadland: £76,039
- Norwich: £365,380
- South Norfolk: £107,001

In 2013/14 the majority of the DHP budget in greater Norwich was spent on mitigating the effects of the SSSC. In Broadland, Norwich and South Norfolk, 64%, 71% and 48% was spent respectively on this welfare reform alone out of the total spend of:

- Broadland: £60,770.
- Norwich: £347,753
- South Norfolk: £143,468

The risk in terms of homelessness in greater Norwich for the future is that if there are further cuts to this budget alongside the lack of available housing that people can downsize into could mean that more people are not able to meet the gap between their rent and shortfall in housing benefit.

5.3 What did the homelessness review tell us?

Young people
There has been an increase in young people becoming homeless and being seen in services that do not traditionally house young people. These young people are more likely to have experienced the care system and/or have faced parental eviction. A recent

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16 HB Circular S1/2015 (DWP, 2015)
Greater Norwich Homelessness Strategy 2015-20

study by the Institute for Fiscal Studies\(^\text{17}\) suggested that young people were the hardest hit by the recent recession in terms of job prospects when compared to other older age groups. During the period 2008 to 2013, young people aged 16-24 are the most disproportionately affected age group when it comes to all statutory homelessness acceptances in the sub-region:

<table>
<thead>
<tr>
<th>Area</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broadland</td>
<td>35%</td>
</tr>
<tr>
<td>Norwich</td>
<td>38%</td>
</tr>
<tr>
<td>South Norfolk</td>
<td>33%</td>
</tr>
</tbody>
</table>

YMCA Norfolk reported in November 2013 that 12 clients received benefit sanctions ranging from 4 to 13 weeks in severity. The majority of their clients were given sanctions for missing appointments or as in one case failure to attend an appointment because they were ill and not providing sick certificates. The majority of clients were forced to apply for hardship loans from the DWP and in some cases they received 40% of their normal benefit payments.

In early 2014, Norfolk County Council’s Children Services launched an improvement plan and is looking to introduce a number of improvements to the services it provides. The improvement plan highlighted that Norfolk has one of the highest rates of “looked after children”\(^\text{18}\) in the country. As of September 2015 the number of looked after children stood at 1,056. Nationally, there is strong evidence of links between homelessness and young people who have experienced the care system. Over the next three years the County Council are looking to reduce the number of “looked after children” by 300. It is imperative that the three Councils in greater Norwich work closely with Children Services to help the transition from care to independent living.

We also understand that there are a number of young people who are on the ‘edge of care’ who either may be hidden homeless (sofa) or living in supported accommodation within greater Norwich who do not meet the criteria for Children Services. We need to identify them to help make sure that their needs are met.

**Children services housing advisor partnership agreement**

In 2015 a post was created within Children services to provide a specialist officer who could offer a full range of housing options and advice to Norfolk County Council staff and clients. The post (which initially is for one year) is hoped to provide better outcomes for young people and improved partnership working between district councils and Norfolk County Council.

\(^{17}\) Living standards, Poverty and Inequality in the UK: 2014 (Institute for Fiscal Studies)

\(^{18}\) A Looked after Child is a child who is accommodated under s20 of the Children Act, subject to a care order under s31 of the Act or who is remanded to the care of the local authority.
5.3.1 Closure of Social Work Practice at Mancroft Advice Project (MAP)
It was announced in May 2015 that the Social Work Practice based at MAP in Norwich was due to close in September 2015 with the service being brought back in-house to Norfolk County Council Children Services. The practice based in Norwich is the busiest out of all the social work teams in Norfolk. The service specialises in helping young people aged 16 and 17 years in finding care, support and housing solutions. Since the inception of the service in September 2012 it has seen 159 young people, 138 of whom have been prevented becoming homeless. Norfolk County Council will still have a duty to provide this service but it is likely that both Norwich City and South Norfolk councils will see increased numbers of young people approaching their services.

5.3.2 Single homelessness and rough sleeping
There has been an increase of numbers of rough sleepers seen on the streets of Norwich; this reflects what is being seen nationally.

- Over the past two years (12/13 and 13/14) the most common housing status of a person seeking housing advice at Norwich City Council is No Fixed Abode (NFA). This category is likely to include people who are sofa surfing, sleeping rough or living at friends/relatives.

- Increase in numbers of people being seen by homelessness services who are affected by sanctions to their benefit entitlement.

- Increase in the number of people being excluded from services because their needs are too high and complex.

5.3.3 Access to social housing
In July 2014, a report conducted by the DWP, Evaluation of Removal of the Spare Room Subsidy: interim report, found that the SSSC (Social Sector Size Criteria or Bedroom tax) has had a significant impact on social housing waiting lists. The main impact has been around affordability because households claiming help with their housing costs will only be paid according to the number of bedrooms they need. This means that people are accepting larger properties and having to make up the short fall in their weekly rent meaning there is greater pressure on smaller bedroom homes. In particular that single people are finding it increasingly difficult to find one bedroom homes. A recent supported housing audit carried out in May 2014 in greater Norwich found that of those 140 people who were ready to move on, 46 were waiting for social housing.

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19 Quarterly report Jan-Mar 2015, (Social work practice, MAP)
20 MOPP (Move on plans protocol) Hostel audit, Norwich City Council, May 2014
5.3.4 Role of housing associations in preventing homelessness

Housing associations are providing an increasing number of homes to rent (and buy) in greater Norwich. As of 2011 there were 13,092 housing association tenancies in greater Norwich; a 28% increase from 2001\textsuperscript{21}. These providers offer a wide range of services that help sustain their tenants in their homes including:

- tenancy support
- financial inclusion services
- tackling worklessness
- family support services (mediation)

5.3.5 Private rented sector (PRS), local housing allowance and housing benefit

The number of possession claims made by landlords has not kept pace with the extensive growth in the private rented sector market in greater Norwich, however one in five of all homelessness contacts at City Hall are from people who are living in the private rented sector.

When the Census was carried out in 2011 there were 5,532 family households (including lone parents) living in the private rented sector with dependent children in greater Norwich, compared to 2,532 in the 2001 Census. Whilst there has been considerable growth in the private rented sector overall, this growth shows families that are unable to buy homes or gain access to the affordable housing sector. Using DWP data we know that as of May 2011, 43% (2,341) of the above households were obtaining help with their housing costs through local housing allowance. There is the potential that if landlords choose to stop letting to families in receipt of benefits that there is increased statutory homelessness in the future and extra pressure may be placed on social housing waiting lists.

From 2011, the Coalition government introduced as part of a number of reforms that reduced Local Housing Allowance (LHA) from the 50\textsuperscript{th} percentile in a Broad Market Rental Area to the 30\textsuperscript{th} percentile of BMRA rents in a local area. There is evidence in Norwich that there has been a 6% reduction (from May 12 to May 14) in the numbers of households in receipt of LHA.\textsuperscript{22} Numbers of people in receipt of LHA in Broadland and South Norfolk have remained stable. Representatives of private landlords (the Residential

\textsuperscript{21} Tenure by household composition, DC4101EW (ONS,2011).
\textsuperscript{22} DWP, Stat Xplorer.
Landlords Association (RLA) gave evidence to a DWP study that landlords in the PRS were becoming increasingly reluctant to let to HB recipients. The RLA reported that since there had been a reduction in LHA they had seen an increase in arrears.

In comparison, over the past five years (May 09 and May 14) the number of housing benefit claimants as a whole (including the social rented sector) in greater Norwich has increased by nearly 9%.

Over the same time period there has been a considerable increase (76%, from 1,291 to 2,199) in the number of people who are working and claiming LHA in greater Norwich. This suggests that rents may be increasing and/or people need LHA to top up the low wages they receive.

5.3.6 Mortgage repossessions
Since the national peak in mortgage repossessions in 2008 we have seen considerable falls in the level of mortgage possession claims in the UK. The first quarter of 2014 (January to March) represented the lowest figure in over a decade. The main reasons for this are:

- lower interest rates
- relatively lower levels of unemployment compared to previous recessionary periods
- introduction of the Mortgage Pre-action Protocol (MPAP) which led to more proactive approaches to dealing with mortgage arrears between lenders, consumers and courts
- introduction of the Mortgage Rescue Scheme

Despite the above factors, (using Ministry of Justice calculations) we can estimate that in 2008-12 (in greater Norwich) there were between 300 to 470 homes repossessed by county court bailiffs. As previously mentioned there are concerns that if there is a return to unsustainable lending by mortgage companies, rising interest rates, capital shortages on interest only mortgages coming to an end, and the removal of the mortgage rescue scheme, we could see an increase in the numbers of homeowners at risk of losing their home.

5.3.7 Statutory homelessness
In the sub-region there was a peak in the numbers of people accepted (337 out of 667 applications) as being homeless and in priority need in 2011/12.

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23 Monitoring the impact of changes to the Local Housing Allowance system of Housing Benefit (DWP, 2013)
24 Page 9, Mortgage and Landlord possession statistics quarterly January to March 2014 (Ministry of Justice, 2014)
Greater Norwich Homelessness Strategy 2015-20

Nationally since 2004 there has been a downward trend in the use of temporary accommodation; December 2011 marked the end to this downward trend. Locally, all three councils saw rises in their use of temporary accommodation (at the end of each quarter) during the following year. Since then both Norwich and South Norfolk have seen their levels drop whilst there has continued to be an upward trend in Broadland’s figures up until the end of 2013. The trend in Broadland can be attributed to a number of factors including:

- lack of availability of affordable social (including new build) and private accommodation;
- prohibitive travel costs because of the rural nature of the district;
- lack of available supported housing schemes in the district;
- high rate of domestic abuse presentations.

With the above factors combined this can mean for someone who cannot remain in their own home, moving them on is very difficult.

5.4 Non-statutory homelessness prevention 2008-13

<table>
<thead>
<tr>
<th>Broadland</th>
</tr>
</thead>
<tbody>
<tr>
<td>Over the five year period Broadland has recorded 1,522 cases of where homelessness was either prevented or relieved outside of the statutory homelessness framework.</td>
</tr>
<tr>
<td>Of these 1,522 cases, 908 (59.65%) were preventions and 614 (40.34%) were cases of relief. In 2012/13, the English average was 90% and 10% respectively.</td>
</tr>
<tr>
<td>Of the 908 prevention cases 517 (56.93%) households were assisted to remain in their own home. In 2012/13, the English average was 52%.</td>
</tr>
<tr>
<td>The most common tool used to help people remain in their own home was through advice and mortgage rescue interventions. This tool accounts for 114, (23%) of these 517 cases.</td>
</tr>
</tbody>
</table>

25 In 2014/15 five mortgage rescues took place.
Greater Norwich Homelessness Strategy 2015-20

Norwich

Over the five year period Norwich has recorded 3,071 cases where homelessness was either prevented or relieved outside of the statutory homelessness framework.

Of these 3,071 cases, 2,640 (85.96%) were preventions and 431 (14.03%) were cases of relief. In 2012/13, the English average was 90% and 10% respectively.

Of the 2,640 prevention cases 431 (16.32%) households were assisted to remain in their own home. In 2012/13, the English average was 52%.

The most common tool used to help people remain in their own home was through providing other assistance like landlord/tenant negotiation. This tool accounts for 53, (21.99%) of these 241 cases. The next most was the use of homeless prevention fund payments. This tool accounts for 48, (19.91%) of these cases.

South Norfolk

Over the five year period South Norfolk has recorded 1,722 cases of where homelessness was either prevented or relieved outside of the statutory homelessness framework.

Of these 1,722 cases, 1,553 (90.18%) were preventions and 169 (9.81%) were cases of relief. In 2012/13, the English average was 90% and 10% respectively.

Of the prevention 1,722 cases 428 (24.85%) households were assisted to remain in their own home. In 2012/13, the English average was 52%.
In 2009-13 the most common tool used to help people remain in their own home was through debt advice, this accounted for 220 (72.13%) of these 305 cases. The next most common tool used was crisis intervention, this accounted for 24, (7.86%) of these cases.

5.5 Key homelessness challenges

In 2003 the then government released a paper ‘More than a Roof – a new approach to tackling homelessness.’ It recognised that the causes of homelessness were wide reaching and may not be down to one single reason. Some of the key causes where recognised as:

Lack of affordable housing
State of the housing market
Personal issues with the individual or their family

With the lack of affordable housing being built in the last three decades there have been an increasing number of people living in the private rented sector to a higher level than ever before. This has meant that more households are not able to enjoy the same level of tenure security that other types of housing such as social and in some cases home ownership. It has also meant that due to this demand, rents in the private rented sector have also risen making it especially difficult for those households that need help with their housing costs.

There is strong evidence that people leaving institutions such as prison, hospitals, psychiatric hospitals, and young people leaving care are still vulnerable to social exclusion that can often lead to homelessness. All homelessness services in Greater Norwich have evidence of people from these backgrounds seeking our help.

5.5.1 Broadland

Some of the key homelessness challenges in Broadland are:

- funding cuts to partner agencies;

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26 Breakdown of 2008/09 figures for how households were assisted to remain in their home are incorrect.
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- the ending of the Government's Mortgage Rescue Scheme is likely to make it harder to prevent homelessness;
- the maturation of many interest only mortgages will have a disproportionate effect in Broadland due to the high rate of owner occupation and the typically older age demographic;
- addressing issues with particularly vulnerable homeless people;
- access to supported housing provision and effective move on options to remedy silting up of this provision;
- older people: asset rich and income poor; fuel poverty; isolation; support and care needs; under occupation and upkeep of properties; and vulnerability to crime;
- young people including care leavers (addressing chronic undersupply of acceptable and affordable accommodation for low income singles);
- helping young people address influencing factors for becoming and remaining Not in Employment, Education or Training (NEET); accessing education, services and support; rural transport;
- improving relationships with partners including Children's Services; and
- changes to legal provision for domestic abuse cases is of particular concern due to our high number of presentations.

5.5.2 Norwich

Some of the key homelessness challenges in Norwich are:

- increasing pressure on front line services such as supported accommodation at a time when funding and resources are being reduced;
- the impact of restriction to access welfare benefits and housing, causing real hardship to families and individuals. For example, we have seen an increase in the number of people who have no recourse to public funds who are fleeing domestic abuse;
- lack of provision for particularly chaotic and multiple need clients;
- increasing numbers of rough sleepers on our streets (mirroring national increases);
- increase in youth homelessness caused by family breakdown and economic hardship through unemployment and welfare sanctions;
- closure of Social Work Practice at MAP in Norwich will increase pressure on front line services;
- increase in the number of landlords willing to let to people who need help with their housing costs through housing benefit;
- further depletion of affordable housing stock through increased discounts through Right to Buy;
- increasing numbers of families claiming housing benefit with dependent children living in the private rented sector;
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- potential increase in youth homelessness when young people (aged 21 and under) are restricted from claiming certain welfare benefits such as LHA or housing benefit;
- economic pressure on working age households’ income who are affected by the SSSC (or opponents call it bedroom tax) who are unable to ‘downsize’ to smaller properties.

5.5.3 South Norfolk

Some of the key homelessness challenges in South Norfolk are:
- the risk of unemployment is a significant consideration to customers - the impact of losing income gained via employment can quickly result in homelessness;
- increasing use of the private rented sector to meet local housing need;
- understanding our homeless customers and their journey is limited, we do not have proper understanding of what it means to be homeless in Greater Norwich and the impact on the health and wellbeing of an individual and on other services;
- children and young people are particularly vulnerable to experiencing homelessness - finding the most appropriate way to meet these complex and specific needs is our key challenge in assisting this group;
- addressing the use of B&B to accommodate homeless households and to improve the quality and reduce the cost of the temporary accommodation service;
- ensuring customers in temporary accommodation have their support needs met;
- South Norfolk is a large and rural district - transport links, lack of telephone signal and broadband connection can make it difficult for people to contact the Council;
- to work with partners so the risk of homelessness is identified at an early stage and;
- to ensure that customers receive support appropriate for them, to regain their independence at the earliest opportunity;
- South Norfolk have an increasingly ageing population and our challenge is helping them to remain independent in their own home, in a sustainable way;
- there is a shortage of homes, of varying size, across all tenures, particularly in rural areas;
- maintaining a properly regulated private rented sector where landlords are encouraged and supported to provide good quality homes to local residents;
- homeless people and those at significant risk of homelessness are less likely to access health care.
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6. Development of the strategy

To create this strategy, a working group of lead officers from the three local authorities, a representative from the health sector, and a representative from local clinical commissioning groups was formed.

The project group considered the following during the preparation of the draft homelessness strategy:

- homelessness review, trends and issues, both quantitative and qualitative which was developed in 2013 and 14;
- national and local policy, current and proposed;
- feedback and suggestions from the Greater Norwich Homelessness Forum;
- feedback from a stakeholders consultation conference;
- analysis of the outcomes of the previous Homelessness Strategy Action Plan 2011-14;
- in South Norfolk partner organisations and internal team members were invited to share their thoughts on recent achievements, challenges for the future and suggestions for future actions during a number of drop in sessions in September 2014.

The Homelessness strategy and action plan were subject to formal consultation between November 2014 and January 2015 for 12 weeks, during which comments were invited from stakeholders and the general public. The working group considered these responses and amended the strategy and action plan where appropriate. A response to the consultation was completed and is available in the appendix of this strategy.

Inspiration for the framework of this strategy was drawn from Homeless Link’s document, “A place to Call Your Home; Take a step, help end homelessness”. This document takes a holistic look at homelessness, considering the wider impacts that being without a home can have on an individual and recognises that these wider impacts come at a high cost – both to the individual and to services which seek to minimise the effects of being homeless. Ultimately it is our aim to reduce the chances of this occurring in the first place – prevention is at the heart of the strategy; by using early help approaches we will prevent people from becoming homeless in the first place and where this is not possible we will strive the reduce the likelihood that individuals will suffer long term effects of being homeless.
Greater Norwich Homelessness Strategy 2015-20

7. Key achievements from the last strategy

Some of the shared greater Norwich achievements are:

- we refreshed our greater Norwich sub-regional protocol for homeless households with joint training completed;
- introduction of a hostel eviction protocol (‘Off the Street’).

7.1 Broadland

Some of the key achievements in Broadland since the last strategy are:

- we realised the highest level of social development in the past 10 years with over 100 units coming on stream in 2014;
- Forward Court, a purpose built supported housing scheme for 7 young people with low to medium support needs, was opened in summer 2014. This is the only provision of its kind in the Broadland area and has taken many years to secure;
- a Hostels Review project was undertaken. This identified existing supported accommodation projects in the County available to Broadland residents. A detailed Hostels Directory was created. This process has led to new and improved relationships with our voluntary sector partners and has significantly improved access to the limited local supported housing placements for our clients;
- representing the County’s local housing authorities inputting into the development of the new leaving care service;
- introduction of a Private Sector Liaison post leading to improvement of Private Sector Leased stock and increase in stock size. Better quality, suitable temporary accommodation options for single people and families has resulted;
- the development of the 'Choices' training scheme for young clients. The course includes formal English and Maths qualifications, employability and employment related certificates, life skills including budgeting and cookery and tenancy management skills;
- we have developed a robust and effective homelessness prevention approach to mortgage arrears by building strong and effective relationships with lenders; offering in-house, specialist debt advice and finding innovative and collaborative solutions to individual households circumstances;
- systems review of the housing service completed which sought to remove wasteful activity and improve client experiences. This is an ongoing process. Benefits to date include:
  - increased customer satisfaction with the service
  - every client approaching the service receives a comprehensive housing options service
  - responsive, demand-informed commissioning of services
Greater Norwich Homelessness Strategy 2015-20

- co-location of allied professionals within the housing service including welfare and debt advice, and domestic abuse specialist support, alongside the Operational Partnership Team, Norfolk Family Focus within the Broadland Early Help hub
- careful matching of clients to properties makes best use of limited stock and best meets household needs by taking into account factors such as access to education, employment and support
- review of the ‘priority’ and ‘no priority’ rent deposit schemes resulting in improved collection rates and therefore greater recycling of funds benefiting more clients. We have introduced a grant pot for clients who are able to afford privately rented accommodation but would not be able to afford to repay a loan for the rent in advance and damage deposit costs;
- ongoing sheltered housing review looking specifically at older clients with a support need and their route through the system
- ongoing systems review of temporary accommodation.

7.2 Norwich

Some of the key achievements in Norwich since the last strategy are:

- introduced a move-on protocol for young people leaving Children Services care;
- increasing the accessibility of our specialist housing advice services. This has ensured that we are able to provide more specialist advice, help more people and prevent more homelessness than ever before;
- expanding our LEAP initiative to address education, accommodation and employment for hostel occupants and ensure a through flow of hostel provision. The project has developed to include GOALS training, peer mentoring services and a community interest company;
- increasing the size of our NCC private sector leasing scheme to help more homeless applicants into accommodation;
- Introduction of a hostel eviction protocol (‘Off the street’);
- focussing our Discretionary Housing Payments (DHP) to ensure resources are focused on those in most need;
- restructured our housing options service to ensure that specialist advice is available for all clients at first point of contact;
- highlighting the high profile issue of street begging and false perception that this is linked to rough sleeping. As a result a successful ‘Alternative Giving’ campaign was run in December 2013 in partnership with the police and voluntary agencies;
- produced an updated information leaflet and map of services for rough sleepers;
- Co-ordinating a severe weather provision for rough sleepers at times of extreme weather;
Greater Norwich Homelessness Strategy 2015-20

- introduced a joint protocol between the council and Children’s Services around families threatened with homelessness;
- working in partnership with St Martins Housing Trust to provide housing for people who need long term supported accommodation because of their frailty and experience of homelessness;
- reviewed our contractual arrangements with agencies who lease Norwich City Council properties, to ensure that the services fit with our overall strategic needs and priorities.

7.3 South Norfolk

Some of the key achievements in South Norfolk since the last strategy are:

- during a time when presentations to the Council for assistance have increased, we have kept preventions and homelessness applications at a stable level by investing time to work with customers at an early stage to prevent their circumstances worsening;
- working closely with SOLO housing, we have built on the success of the lodgings scheme we fund and SOLO have increased the number of landlords engaged in the process, enabling more people to benefit;
- we have introduced a bond scheme, to assist customers who access the private rented sector to meet their housing requirements;
- since 2012 we have been building on our bespoke choice based lettings system, and have tailored it to meet local need more effectively.
- we have utilised income from the Single Homelessness Prevention Fund, to enable us to be more innovative and creative in finding solutions to avert crisis;
- we are part of a local authority and Children Services partnership with YMCA who deliver Nightstop Plus; this provides short term emergency accommodation for young people with volunteer hosts in a supportive family environment, while family mediation and/or other housing solutions are explored;
- we have access to supported lodgings that are specifically for young people, provided and managed by YMCA;
- we ensure that homeless households moving into temporary accommodation in the area are given a support plan to identify other needs which help that individual or family get on in life, such as in employment and training, and/or health and wellbeing;
- our house build programme is flexible, allowing us to meet local need. In recent times the increased need for 1 bedroom properties has been met through effective negotiation and planning.
- we have introduced a local connection to the area by virtue of employment and provision of or need for care and support. This offers opportunities for growth in the district by encouraging skilled workers into the area to support business. Enabling people
Greater Norwich Homelessness Strategy 2015-20

to move based on care need allows people to access the support they need without reliance on public services or those which come at a high cost to them and to services;
• we have restructured our services to ensure that specialist advice is available for all customers when they request it and at the earliest opportunity. We have increased accessibility of specialist housing advice services, which has ensured that we are able to provide appropriate and holistic advice, help more people and prevent more homelessness than ever before;
• we continue to work closely with our Revenues and Benefits team to provide a more unified service for customers help with their rent. All parties (including the customer) agree to work together to secure the temporary funding necessary for stability through Discretionary Housing Payments while we provide the debt and housing advice required. This approach ensures that the customer progresses in terms of debt and/or alternative housing for the duration of the DHP award rather than reaching the end of the award and being no further on;
• continuing to deliver increasing numbers of affordable homes year on year. Whilst identifying changing demand and meeting it, by working with developers to ensure that the homes built are addressing needs in the district.

8. How will we know?

Monitoring

We will review this homelessness strategy annually with our partners to make sure that we have a proactive approach to preventing homelessness so that it is responsive to emerging needs.

The actions in this strategy will also be reviewed annually to measure progress, and where required we will revise the challenges and actions to ensure the continued relevance of the document.
9. Glossary of terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Benefit cap</td>
<td>Limit on the total amount of certain benefits you can get if you are working age. The benefit cap affects those households getting housing benefit or Universal Credit. If the cap affects the household; housing benefit or Universal Credit is reduced.</td>
</tr>
<tr>
<td>Broad rental market area (BRMA)</td>
<td>The BRMA is an area defined by the Valuation Office Agency and is an area of residential accommodation within which a person could move and still have access to similar services of a similar standard. Each BRMA has its own set of LHA rates. Your postcode defines which BRMA in which you live.</td>
</tr>
<tr>
<td>Choice based lettings (CBL)</td>
<td>Choice based lettings gives a household the chance to apply for empty council and housing association properties that the council or housing association advertises (Currently Norwich and South Norfolk Council’s operate this system).</td>
</tr>
<tr>
<td>Clinical commissioning group</td>
<td>Clinical commissioning groups are responsible for implementing the commissioning roles as set out in the Health and Social Care Act 2012.</td>
</tr>
<tr>
<td>Consumer price index (CPI)</td>
<td>A measure of changes in the purchasing-power of a currency and the rate of inflation. The consumer price index expresses the current prices of a basket of goods and services in terms of the prices during the same period in a previous year, to show effect of inflation on purchasing power.</td>
</tr>
<tr>
<td>DASH (Domestic abuse, stalking and harassment and honour based violence risk identification, assessment and management model)</td>
<td>Common checklist for identifying and assessing risk for use by practitioners.</td>
</tr>
<tr>
<td>Discretionary housing payments (DHP)</td>
<td>Local housing authorities have the ability to authorise DHP to those who may require some financial assistance in order to meet their housing costs.</td>
</tr>
<tr>
<td>Family intervention project (FIP)</td>
<td>Way of working that has been found effective for improving a range of family functioning issues including anti-social behaviour, non-attendance in education and worklessness.</td>
</tr>
<tr>
<td>Health and Wellbeing Boards</td>
<td>Statutory bodies introduced in England under the Health and Social Care Act 2012. According to the Act, each upper-tier local authority in England is required to form a Health and Wellbeing Board as a</td>
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39
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Greater Norwich Homelessness Strategy 2015-20</td>
<td>committee of that authority.</td>
</tr>
<tr>
<td>House of multiple occupation (HMO)</td>
<td>A HMO is an entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet.</td>
</tr>
<tr>
<td>Joint strategic needs assessment (JSNA)</td>
<td>The means by which CCGs and local authorities describe the future health, care and wellbeing needs of the local populations and to identify the strategic direction of service delivery to meet those needs.</td>
</tr>
<tr>
<td>Let NCC</td>
<td>Norwich City Council’s private sector leasing scheme.</td>
</tr>
<tr>
<td>Local housing allowance (LHA)</td>
<td>Local housing allowance is housing benefit that helps pay the rent if you rent from a private landlord.</td>
</tr>
<tr>
<td>Looked after children</td>
<td>Looked After - a provision made under the Children’s Act 1989 in England and Wales, whereby a local authority / Health and Social Care Trust has obligations to provide for, or share, the care of a child or young person under 16 years of age where parent(s) or guardian(s) for whatever reason are prevented from providing them with a suitable accommodation or care. A child is ‘looked after’ if he or she is provided with accommodation.</td>
</tr>
<tr>
<td>Multi-agency risk assessment conference (MARAC)</td>
<td>A MARAC is a risk management meeting where professionals share information on high risk cases of domestic violence and abuse and put in place a risk management plan.</td>
</tr>
<tr>
<td>Norwich, Learning Education Accommodation Project (LEAP)</td>
<td>LEAP is an organisation comprised of a partnership with St Martins Housing Trust and Norwich City Council that helps empower people who face homelessness to live a fulfilling life of their choice by providing Independent accommodation and supporting them towards employment.</td>
</tr>
<tr>
<td>Not in Employment, Education or Training (NEET)</td>
<td>A young person who is no longer in the education system and who is not working or being trained for work.</td>
</tr>
<tr>
<td>No fixed abode (NFA)</td>
<td>A person having no permanent residence.</td>
</tr>
<tr>
<td>SafeLives</td>
<td>SafeLives, is a national charity dedicated to ending domestic abuse. Previously called Co-ordinated Action Against Domestic Abuse (Caada), we chose our new name because we’re here for one simple reason: to make sure all families are safe.</td>
</tr>
<tr>
<td>Sofa surfing</td>
<td>Staying temporarily with various friends and relatives while attempting to find permanent accommodation.</td>
</tr>
<tr>
<td>Supported lodgings</td>
<td>Supported Lodgings is an accommodation scheme for vulnerable young people aged 16-24 across Norfolk. Supported Lodgings provides young people who find themselves with nowhere to live and</td>
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</table>
### Greater Norwich Homelessness Strategy 2015-20

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>little to no support network, with a safe, supportive place to stay in the homes of local people.</td>
<td>People sleeping rough in Norwich can access emergency accommodation and support during periods of exceptionally cold weather through the SWEP. This is activated by a temperature of zero degrees Celsius or lower forecast for at least three consecutive nights.</td>
</tr>
</tbody>
</table>
Community Infrastructure Levy (CIL). Exemptions for residential extensions and Instalment Policy

Report of the Director of Growth & Localism
Cabinet Member: Lee Hornby / John Fuller

Business Improvement Manager
Stuart Pontin
01508 533796
spontin@s-norfolk.gov.uk

South Norfolk Council
Working with you, working for you
1. Introduction

1.1 This authority implemented the Community Infrastructure Levy on 1st May 2014.

1.2 CIL is operated jointly with Norwich City Council and Broadland District Council with a common Charging Schedule and Instalment Policy.

1.3 The Charging Schedule sets a CIL rate of either £50 or £75 per square metre for residential development including extensions to domestic properties. An amendment to the CIL Regulations in February 2014 introduced an exemption to the CIL levy for domestic extensions.

1.4 Discussions have taken place between the three Authorities regarding the application of CIL to domestic extensions and the phasing of payments. Broadland District Council’s Cabinet has resolved to no longer apply CIL to residential extensions in view of the high cost of implementing this part of the Regulation and has revised instalment policy for the collection of CIL in order to assist the cash flow for small developers. It is recommended that South Norfolk Council revise our operation of CIL to reflect that now being implemented by Broadland District Council.

2. Background

2.1 All new residential properties and extensions to existing properties of 100square metres or above, are required to pay a CIL levy.
2.2. A number of amendments to the CIL Regulations have been made since their inception including one in February 2014 which introduced an exemption to the CIL levy for domestic extensions, where the applicant owns a material interest in the house, occupies the main house as their main residence and the extension is an enlargement of the main house and is not going to occupied as a separate dwelling. CIL however continues to be liable where the development is by a builder who subsequently sells on the extended property.

2.3. The Authority also adopted an instalment policy for the payment of CIL whereby CIL charges of £60,000 or more applied. For lesser amounts CIL needs to be paid within 60 days of commencement of the development.

3. Current Position / Findings

3.1 In order to qualify for the residential extension exemption the applicant / developer needs to make an application, following receipt of the liability notice issued by the LPA, and to wait until the Council has notified the claimant of the decision on the claim before commencing development.

3.2 As at end September 2015, 44 household applications had been recorded as being liable for CIL (potentially generating an income of £414,119.37) and relief had been granted on 28 of these (equating to £259,773.12). The applicant has until commencement to claim relief and consequently the remainder could still claim relief. This was from a total of 1006 household applications determined between 1st May 2014 and 30th September 2015. All of these 1006 applications had to be assessed to determine whether or not they were of a size to trigger CIL liability.

3.3 To date only two householder applications have generated a CIL income totalling £8279.34. Of this £3000 has been paid and the remaining £5279.39 is currently being contested.

3.4 There is a considerable amount of paperwork associated with the collection of CIL for household extensions which involves several teams. In relation to domestic extensions, there are very few circumstances where relief from CIL would not be granted.
4. Proposals

4.1 If CIL were not to be applied to applications for extensions to domestic properties the staff savings would be twofold:

(i) The processing time for officers in not having to assess each and every householder application to determine whether it is CIL liable. Some are obviously easier than others. We have determined 1006 household applications since CIL was introduced and in a high proportion of cases have asked for the additional information form to be submitted which is then either downloaded or scanned, uploaded onto the website and subsequently assessed and

(ii) Not having to send out liability notices (44 of these); determining the application for relief on extensions (28 of these); and keeping the land charges records up to date.

4.2 The Council is able to recover the costs of administering the CIL Regulations up to a maximum of 5%. As at end September 2015 it is estimated that we had incurred total costs of £9,380 in processing CIL liabilities on domestic extensions. There are currently liabilities of £8279.34, equating to an admin cost of £413.95. As such, the costs recovered are not anywhere near offsetting the costs of pursuing this form of CIL and therefore to continue to apply this section of the legislation will result in a continuing drain on the Council’s resources.

4.3 When the Community Infrastructure Levy was introduced an instalment policy was adopted whereby if a CIL liability was £60,000 or more then payments could be made in instalments. Since operating CIL we have received a number of requests from small developers, whose total CIL liability was less than £60,000, who experience cash flow difficulties in meeting the CIL payment within 60 days of commencement of the development.
4.4 Current instalment policy up to £999,999 are:

<table>
<thead>
<tr>
<th>Amount of CIL Liable</th>
<th>Number of Instalments</th>
<th>Payment Periods and Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to £59,999</td>
<td>1</td>
<td>Total amount payable within 60 days of commencement of development.</td>
</tr>
<tr>
<td>Amounts between £60,000 to £999,999</td>
<td>2</td>
<td>60 days after commencement 25% 360 days after commencement 75%</td>
</tr>
</tbody>
</table>

4.5 Proposed instalment policy up to £999,999

<table>
<thead>
<tr>
<th>Amount of CIL Liable</th>
<th>Number of Instalments</th>
<th>Payment Periods and Amounts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to £24,999</td>
<td>1</td>
<td>Total amount payable within 60 days of commencement of development.</td>
</tr>
<tr>
<td>£25,000 to £99,999</td>
<td>2</td>
<td>60 days after commencement 25% 180 days after commencement 75%</td>
</tr>
<tr>
<td>£100,000 to £999,999</td>
<td>2</td>
<td>60 days after commencement 25% 360 days after commencement 75%</td>
</tr>
</tbody>
</table>

4.6 It is proposed that the instalment policy be amended to reduce the lower level whereby payment can be made by instalments from £60,000 to £25,000. This will ease the burden on smaller developers whilst not unduly increasing the administrative burden for the Authority nor significantly reducing the income in any one year to the Authority.
5. Risks and Implications arising

5.1 The risk associated with not applying the charge to residential extensions is considered to be low. The Government has made clear the desire to limit liabilities to householders by the 2014 Amendments to the Regulations. Broadland District Council has already resolved not to continue administering this element of the Regulations and we would be consistent with their operation of CIL within the Norwich area.

6. Other Options

6.1 To continue to assess each householder planning application for extensions to determine whether it is a CIL liable development, issue a liability notice, determine applications for relief from CIL, record CIL liability as a Land Charge and subsequently record exemption relief.

6.2 This option places a burden on applicants as they have to complete an additional form at the time of submitting their planning application, apply for relief from CIL and await a response before commencing their development and maybe submit a commencement notice.

6.3 To continue to apply the instalment policy as previously adopted or to amend the policy in some other way to that indicated in section 4 of this report.

7. Recommendation

7.1 That this Authority no longer applies CIL to residential extensions in view of the high cost of implementing this part of the Regulation.
7.2 That the instalment policy is amended to that set out in section 4 of this report.
Council Tax Support Scheme 2016/17

Report of the Corporate Customer Services Manager
Cabinet Member: Yvonne Bendle

CONTACT
Amanda Adams 01503 533773
aadams@s-norfolk.gov.uk
1. Introduction

1.1. The purpose of this report is to obtain Cabinet approval to go forward to the Council with a Council Tax Support Scheme for 2016/17. The report outlines the legal requirements and features of the scheme and proposes amendments to the previous scheme approved in December 2014. The amendments proposed are after reflection on:

1.1.1. the impact of recent Welfare Reform changes
1.1.2. further proposed national changes from April 2016
1.1.3. responding to recent feedback from consultation of our proposals

2. Background

2.1. As part of the Welfare Reform Act 2011, Council Tax Benefit was withdrawn by the Government on 31 March 2013. From 1 April 2013 the Government required each local Council to set up a local Council Tax Support scheme.

2.2. The Local Government Finance Act 2012 inserted into Section 13A (2) of the Local Government Finance Act 1992, the requirement that – “Each billing authority in England must make a scheme specifying the reductions which are to apply to amounts of council tax payable, in respect of dwellings situated in its area, by persons whom the authority considers to be in financial need, or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.”

2.3. Schedule 4, Part 1 (5) of the Local Government Finance Act 2012 states that for each financial year, a billing authority must consider whether to revise or replace its scheme with another and that this must take place by the preceding 31 January.

2.4. Statutory requirements are in place to protect people of pension age at the same levels of support as would have applied had the Council Tax Benefit scheme continued.
2.5. Under the legislation local authorities are required to consult each year on their proposed Council Tax Support Scheme, even if they retain the current scheme they have in place, or agree a scheme under which no-one is worse off.

2.6. In 2012 a working group of elected members worked with officers to develop our approach to the design of our local Council Tax Support scheme. The challenge was to design a scheme within a limited budget (after 10% funding cut imposed by Government) while protecting pensioners at previous levels of support. This meant that in South Norfolk, working age customers would be adversely affected within the new scheme, because of the high percentage of pensioner claims within our caseload (currently at 53%).

2.7. The working group established a number of guiding principles to set our scheme. These were that our local scheme is:

- as fair as possible within the budget constraints
- aligned with rules for other state benefits wherever practical in order for it to be more easily understood (e.g. Universal Credits)
- protects as far as possible those working and those with young families
- operationally efficient to manage

2.8. Since 2012, prior to Cabinet approval, we have consulted residents each year taking notice of the areas where people were unsure of proposals and amending our scheme. In addition, we have made changes to reflect local needs as demonstrated by requests for discretionary hardship funding.

2.9. Funding for 2016/17 will be available to Parish and Town Councils on a similar basis to that in 2015/16. However, this is likely to reduce in line with any reductions in the Revenue Support Grant.
3. Current Position / Findings

3.1. We have monitored carefully the effects of welfare reform over the past two years and considered additional Welfare Reforms yet to be implemented from April 2016. Our response is reflected in our proposals for going forward in 2016/17 with a revised local Council Tax Support Scheme.

3.2. Throughout the Welfare Reform agenda a number of benefit changes have been implemented which have affected our residents. Our response has been to adopt a framework approach with our partners so that we can work in a 'joined up' way. Working together with an emphasis on early prevention measures we have helped to pre-empt some of the adverse effects of Welfare Reform. We continue to work in this way and have developed this significantly by working closely with Diss Job Centre Plus where we have a member of staff based.

3.3. For 2016/17 the financial situation remains the same in that the Council needs to look to set a scheme which is affordable within the Council’s overall financial position to help those in financial need without putting a financial burden on Council Tax payers or resulting in service cutbacks. However, we continue to have the issue of protecting those of pension age which means there is pressure on the funding available for support of working age.

3.4. The draft Council Tax Support scheme for 2016/17 has been out to public consultation for seven weeks from 28/09/15 to 15/11/15, and as required we have consulted Norfolk County Council and the Police who are in agreement with the broad principles of the scheme.

3.5. The public consultation focussed on areas where it was felt that the local scheme should be amended to go further to reflect the agreed principles of our scheme to incentivise work and ‘make work pay’. This in addition to listening to the views of our residents has helped us to develop the following set of proposals.
4. Proposals

4.1. The proposal is that Cabinet considers the amendments set out below, which if approved, will form part of the proposed scheme which we ask Cabinet to recommend to Council for approval. In summary, the draft 2016/17 scheme on which we have consulted retains all the features of the 2015/16 local scheme agreed by Council in December 2014 plus further amendments to give greater support to those in work.

4.2. The first proposal is to amend the scheme to increase by 20% the amount of earnings to be disregarded in the calculation. This means residents get to keep more of the money they earn as income before we take it into account.

4.3. In the public consultation, 79% (of those who expressed a view) agreed to the proposal to amend the amount of earnings we disregarded.

4.4. The second proposal is to align the rules for back dating claims for Council Tax Support with forthcoming new rules for Housing Benefit and Universal Credit. This would mean that the maximum period that backdated support could be claimed would be 28 days from April 2016.

4.5. In the public consultation, 79% (of those who expressed a view) agreed with aligning the backdating rules.

4.6. The third proposal is to align the rules for Council Tax Support with those for Housing Benefit and Universal Credit to remove the family premium from the assessment of new, working age claims from May 2016. This would mean that some families, who make claims from May 2016 will have less support than existing customers.

4.7. In the public consultation, 57% (of those who expressed a view) agreed with aligning the rules with Housing Benefit and Universal Credit to change the calculation of support in this way.
We also consulted on the issue of adjusting the level of support for those who would have been adversely affected by the proposed changes to tax credits. However, since the Government’s Comprehensive Spending Review announcement on 25 November 2015, this is no longer appropriate.
5. **Consultation**

5.1. In accordance with the legislation we have consulted the major precepting bodies on our draft scheme for 2016/17 and carried out a public consultation exercise inviting local residents to take part by completing an online survey.

5.2. The major precepting bodies are in agreement with the broad principles and have expressed support for the scheme on the basis that it remains affordable.

5.3. We have received 431 responses to our online survey. As we move forward into 2016/17 we have proposed a different way of treating those who are in work (but on low pay) in order to consolidate our approach of incentivising work. The consultation has shown overwhelming support for this proposal with 79% agreement.

6. **Risks and Implications arising**

6.1. **Financial**

6.2. The increased earnings disregards proposed for 2016/17 would increase the overall cost of awards by approx. £139k. However, the increased costs will partly be offset by the likely savings made of £39k through the proposal to reduce backdating and the removal of the family premium from April 2016. This means that the scheme is likely to cost in total £100k more than had we not made these adjustments (£8.4k share to South Norfolk Council).

6.3. The proposed scheme for 2016/17 will be affordable as the cost of the scheme is falling overall year by year as numbers of claimants reduce. Taking account of 6.2 above, it is envisaged that the 2016/17 scheme will cost £161k less than the 2015/16 scheme was forecast to cost when agreed by Council in December 2014. The share of this saving to South Norfolk Council is £13.5k.
6.4. Although it is not quantifiable at this stage, we do expect demand for this support to continue to fall in line with the consistent trend we have seen since the implementation of the local scheme which means we will deliver a scheme at an even lower cost.

6.5. The funding of variations to the cost of the scheme is shared between the County Council, Police Authority, South Norfolk Council and parishes. It is critical that our scheme is affordable to these authorities and that any volatility in costs can be absorbed by them.

6.6. There is a financial risk as demand for support can rise and any increase in the cost of the scheme would fall partly on SNC. We will review the scheme annually to ensure it continues to meet priorities, is affordable and because the law requires us to do so.

6.7. We have a discretionary fund available for help for those individuals and families for whom the scheme has unintended consequences. The policy on use outlines how it will be used as short term help for those in financial crisis rather than long term support. Adverse effects on residents will be monitored carefully and home visits will continue to give holistic and individual assistance for those requiring advice and support.

6.8. Legal - there is a legal requirement to make a scheme under the Local Government Finance Act (Section 8 and Schedule 4)

6.9. Equalities – In moving from the 2015/16 scheme to the proposed 2016/17 scheme some groups of those currently claiming are better off and none are adversely affected. An Equality Impact Assessment has been carried out Appendix 1 (members are requested to have regard to this assessment when considering this report).

7. Recommendation

7.1. Cabinet to agree and recommend to Council the proposals outlined in Section 4. These are minor amendments to the scheme previously developed which supports this council’s objectives through enhancing the health and wellbeing of our residents. This scheme supports families, incentivises work and is efficient to manage. The scheme achieves this by; ensuring those in receipt of support would be no worse off at the transition to the new scheme, the calculation of support
for new customers from April 2016 align with Housing Benefit changes and greater support is provided to those in work but on low pay.

7.2. Cabinet to agree that the detailed scheme at Appendix 2 (legal document containing rules for the administration of the Council Tax Support scheme) be approved and put forward to full Council as the scheme to be adopted for 2016/17.
Equality Analysis: Council Tax Support Scheme

1. Introduction
1.1. Council Tax Support is a local scheme to support those on low incomes to help with Council Tax liability.
1.2. When developing policy, procedures, practices or services we will need to consider any potential impact on protected groups in relation to the three aims of the duty which are to:
   1.2.1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
   1.2.2. Advance equality of opportunity between people who share a protected characteristic and those who do not
   1.2.3. Foster good relations between people who share a protected characteristic and those who do not

2. Background
2.1. Over the last three years there have been a number of changes in welfare reform which have impacted on those who have protected characteristics as defined in the Equality Act 2010.
2.2. These changes disproportionately affect those who are vulnerable and in the lowest income brackets, many of which rely on benefits.
2.3. In order to protect pensioners on low incomes, the scheme at South Norfolk Council is required to replicate as far as possible the provisions under which pensioner eligibility for council tax benefit was assessed.

3. Statistics
3.1. This section details those in protected groups in our current caseload (where information is available)
3.2. Current Caseload: Primary claimant by age

- Age 18 - 59: 47%
- 60+: 53%

3.3. Of the total caseload 2% (169) are single persons aged between 17 and 25.

3.4. Current Caseload: Primary claimant by sex

- Men: 41%
- Women: 59%
3.5. Current Caseload: Disability Related Premiums & Carers

3.6. Ethnic Origin (only disclosed in 36% of cases)

<table>
<thead>
<tr>
<th>Ethnic Origin</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian/Asian British/Bangladesi</td>
<td>0.07%</td>
</tr>
<tr>
<td>Asian/Asian British/Indian</td>
<td>0.10%</td>
</tr>
<tr>
<td>Asian British/Other</td>
<td>0.07%</td>
</tr>
<tr>
<td>Black British/Other</td>
<td>0.13%</td>
</tr>
<tr>
<td>Black/British African</td>
<td>0.20%</td>
</tr>
<tr>
<td>Black British/Caribbean</td>
<td>0.07%</td>
</tr>
<tr>
<td>White British</td>
<td>91.67%</td>
</tr>
<tr>
<td>Chinese</td>
<td>0.07%</td>
</tr>
<tr>
<td>Mixed Other</td>
<td>0.23%</td>
</tr>
<tr>
<td>Not disclosed by customer</td>
<td>1.69%</td>
</tr>
<tr>
<td>Refused</td>
<td>3.35%</td>
</tr>
<tr>
<td>Mixed White and Black African</td>
<td>0.03%</td>
</tr>
<tr>
<td>Mixed White and Black Caribbean</td>
<td>0.07%</td>
</tr>
<tr>
<td>Missed White and Asian</td>
<td>0.03%</td>
</tr>
<tr>
<td>White Irish</td>
<td>0.33%</td>
</tr>
<tr>
<td>White Other</td>
<td>1.89%</td>
</tr>
</tbody>
</table>
3.7. Current caseload totals

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Caseload</td>
<td>8459</td>
</tr>
<tr>
<td>Age 18 - 59</td>
<td>3976</td>
</tr>
<tr>
<td>60+</td>
<td>4483</td>
</tr>
<tr>
<td>Men</td>
<td>3468</td>
</tr>
<tr>
<td>Women</td>
<td>4991</td>
</tr>
<tr>
<td>Disability Related Premium</td>
<td>507</td>
</tr>
<tr>
<td>Carers Premium</td>
<td>254</td>
</tr>
<tr>
<td>Lone Parents</td>
<td>1184</td>
</tr>
</tbody>
</table>

3.8. The largest group in our caseload is single females over 60 years old (28%). Our smallest group is the single under 25’s (2%)

4. Impact Analysis

4.1. For existing customers in receipt of Council Tax Support there will either be no change from the 2015/16 scheme or, if they are in work, they will be better off in the 2016/17 scheme.

4.2. Under the proposals, new customers who are in work and have children will be affected from April 2016. It is difficult to predict volumes of new claims for this group, however, it is estimated that between 350 and 400 families could be adversely affected by the proposed rules to change the way Council Tax Support is calculated (aligning it with prescribed Housing Benefit rules). The increased amount of Council Tax these customers will be expected to pay towards their council tax will average £95 for the year. Many will see no increase in what they pay towards their Council Tax and the most someone in this group could pay could be increased to £181.

5. Mitigation

5.1. The protected groups most vulnerable to reductions in benefit are those who may have more difficulty in gaining employment such as lone parents with young children, older people and disabled people. Older people are protected from any reductions under the new scheme by the legislation and therefore any reduction in support is borne by the remainder of those in receipt of Council Tax Support.

5.2. Under our scheme, lone parents with children under 5 years are protected as it is considered that they may have more difficulty in obtaining employment due to child care issues.

5.3. One of the principles of our scheme is to encourage people into work therefore there are financial incentives to promote this. However, disabled people find it much harder to secure employment than non-disabled people so employment incentivisation could impact on this group who find it more difficult to access the labour market.

5.4. Our scheme takes into consideration that disabled people who are not working may find it more difficult to access the job market, therefore, the
scheme uses an assessment within the calculation of support which treats disabled people as if they were working.

6. **Conclusion**

6.1. Any scheme that leads to a reduction in support for those on means-tested benefits will have a negative impact, leading to difficult decisions to be made as to where such cuts should fall.

6.2. As part of our considerations we have been mindful of those who are protected under the Equality Act 2010 when reaching our proposal for our Council Tax Scheme

6.3. We believe that our Council Tax Support Scheme where we disregard certain incomes, offer Lone Parents with children under 5 full protection, treat those who are disabled as if they were working and have a Discretionary Fund for any who suffer hardship we are offering the best fit scheme for the resources that we have available to us.
Equality Screening Tool
Relevance, Proportionality, Risk

This tool should be used to carry out a screening check of any policy, procedure, practice or service for its potential impacts or significance to equality and relations between different protected groups. The check will allow you to establish whether a full equalities analysis is appropriate and necessary. Further information can be found on our equalities pages.

Each statement should be scored as either none, low, medium or high. If any of the statements score medium or high you should refer to the Equality Review Principles guidance which details further actions needed.

<table>
<thead>
<tr>
<th>Name</th>
<th>Amanda Adams</th>
<th>Team</th>
<th>Revenues &amp; Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title of the policy, practice or service</td>
<td>Council Tax Support Scheme - 2016/17</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1) Relevance

<table>
<thead>
<tr>
<th>What is the likelihood of any disproportionate negative impact occurring for staff or residents relating to a protected characteristic?</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is the potential for any negative impact on relations between groups or communities related to any given protected characteristic?</td>
<td>Low</td>
</tr>
</tbody>
</table>

Any additional comments on relevance: New claimants from May 2016 who are in work and have children may be affected in that they will not receive as much support as similar families already claiming. It is difficult to predict numbers involved but it is estimated that between 350 and 400 families may be affected.

2) Proportionality

<table>
<thead>
<tr>
<th>Will it have any direct implications for the life chances of staff or residents?</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>What are the budgetary/resource implications?</td>
<td>Low</td>
</tr>
<tr>
<td>What proportion of staff or residents will be impacted?</td>
<td>Low</td>
</tr>
<tr>
<td>What is the significance or value placed upon it by relevant stakeholders?</td>
<td>Medium</td>
</tr>
</tbody>
</table>

Any additional comments on proportionality: There will be no change for existing claimants and for many new claimants from May 2016 there will be no increase in what they will be asked to pay in comparison to the current scheme. It is difficult to predict the impact for those who may be affected but the average cost is likely to be £95 more to pay for their Council Tax charge and no more than £181 per year.

3) Risk

<table>
<thead>
<tr>
<th>What is the potential for negative impact on the inclusion or involvement or any particular group?</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is the likelihood of media interest?</td>
<td>Medium</td>
</tr>
<tr>
<td>What is the likelihood of formal challenge?</td>
<td>Medium</td>
</tr>
</tbody>
</table>

Any additional comments on risk: There will be no changes for existing claimants receiving Council Tax Support. For new claimants approx. 350 to 400 families could be affected as their support will be reduced, although this number is yet unknown.

What is the overarching significance of the policy, practice or service to equality? Low

Does it require further equality analysis? (If relevance, proportionality or risk were ranked medium or high then further analysis will be needed. Yes

Please state the reason either why further analysis is not needed or what further analysis will be required:

For existing customers in receipt of Council Tax Support in 2016/17, there will be no changes from the 2015/16 scheme and if they are working, they will be better off. It is therefore envisaged there will be no adverse impact on this group.
Under the scheme, lone parents with children under five years are protected as are older people and disabled people.

As disabled people find it harder to obtain employment, the Council Tax Support Scheme assesses them as if they are working which is more favourable.

Older people are protected from reductions under new legislation and any reduction is borne by Council Tax Support.

The Council Tax Support scheme disregards certain incomes and includes a discretionary fund for any who suffer hardship.

Once the number of new customers who are in work and have children are known, we may need to undertake a more detailed equalities impact assessment for new customers who have protected characteristics as defined by the Equality Act 2010.
Statement of Licensing Policy

Report of the Licensing & Enforcement Officer
Cabinet Member: Lee Hornby

CONTACT
Amanda Cox – 01508 533621
acox@s-norfolk.gov.uk
1. Introduction

1.1. The Licensing Act 2003 (the Act) came into effect in 2005 and imposes a duty on South Norfolk Council as the licensing authority for licensable activities taking place within the district.

2. Background

2.1. The legislation provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken:

- The prevention of crime and disorder;
- Public safety;
- The prevention of public nuisance; and
- The protection of children from harm.

2.2. For the purposes of the Act, the following are licensable activities:

- The sale by retail of alcohol;
- The supply of alcohol by or on behalf of a club, or to the order of, a member of the club;
- The provision of regulated entertainment; and
- The provision of late night refreshment.
2.3. The Act provides for four different types of authorisation or permissions:
- Premises licence – to use premises for licensable activities
- Club premises certificate – to allow a qualifying club to engage in qualifying club activities
- Temporary event notice – to carry out licensable activities at a temporary event
- Personal licence – to sell or authorise the sale of alcohol from premises in respect of which there is a premises licence

2.4. The Act requires a licensing authority to determine and publish a statement of its licensing policy at least once every five years. The policy must be published before it carries out any licensing functions under the Act. A copy of the proposed policy is attached at Appendix A.

2.5. Before determining the policy, the licensing authority must consult the persons listed in section 5(3) of the Act. These are:
- The chief officer of police for the area;
- The fire and rescue authority for the area;
- Each local authority's Director of Public Health in England;
- Persons/bodies representative of local premises licence holders;
- Persons/bodies representative of local club premises certificate holders;
- Persons/bodies representative of local personal licence holders; and
- Persons/bodies representative of businesses and residents in its area.
2.6. The views of all these persons or bodies should be given appropriate weight when the policy is determined.

3. Current Position / Findings

3.1. The revised Statement of Policy must take effect on the 7 January 2016.

3.2. It was decided to widen the consultation from that provided by the Act to include those we felt may be affected or otherwise have an interest in the policy. A list of those consulted is attached at Appendix B. The consultation took place between the 1 September 2015 and 12 October 2015. The draft policy was also available on South Norfolk Council’s website and reception area and at each library within the district for the full consultation period.

3.3. To ensure a consistent approach across the county to the interpretation of the Licensing Act and subsequent issued guidance, a Norfolk working group was set up to prepare the revised Statement of Policy.

3.4. Three representations were received and considered during the consultation period as follows:

<table>
<thead>
<tr>
<th>Party</th>
<th>Summary of Representations</th>
<th>Proposed Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norfolk Association of Village Halls</td>
<td>Proposal for premises user to notify premises licence holder/premises owner/management when applying for a temporary event notice.</td>
<td>Not applicable. This would be a legislative change to the Licensing Act 2003. Presently there is a requirement to notify Norfolk Constabulary and the community protection team.</td>
</tr>
</tbody>
</table>
Wymondham Town Council  No comment  Not applicable
Costessey Town Council  No objections  Not applicable

3.5. Therefore no amendments are required as a result of the representations received. A copy of the representations is attached at Appendix C.

3.6. During the consultation process, the Home Office issued Paragraph 2A of Schedule 2 to the Act (as inserted by the Deregulation Act 2015). This provides powers to licensing authorities to exempt premises, in certain circumstances from the requirement to have a licence to provide late night refreshment. Any decision to implement these exemptions would be subject to further amendment to the policy and its own full consultation process. The draft policy has been updated to this effect at Section 8 of the policy.

4. Proposals

4.1. To adopt the Statement of Licensing Policy to enable a consistent approach to the licensing authorities duties under the Licensing Act 2003.

5. Risks and Implications arising

5.1. The Act requires a published statement of licensing policy to enable the authority to carry out licensing functions under the Act. A decision not to publish this policy may result in activities being carried out which could impact on the licensing objectives, as detailed in paragraph 2.1 above.
6. Recommendation

6.1. To recommend that Council adopts the Statement of Policy, as set out in Appendix A and authorises the Director of Growth and Localism to carry out all regulatory processes to enable the policy to come into effect on the 7 January 2016.
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<td>2</td>
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<td>12</td>
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<td>8</td>
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<tr>
<td>19</td>
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<td>11</td>
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<td>20</td>
<td>Administration, exercise &amp; delegation of functions</td>
<td>12</td>
</tr>
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Definitions

Note: In this policy, the following definitions are included to provide an explanation of certain terms included in the Licensing Act 2003 and therefore in the policy. In some cases they are an abbreviation of what is stated in the Licensing Act 2003 or an interpretation of those terms. For a full definition of the terms used, please refer to the Licensing Act 2003.

‘the Act’ refers to the Licensing Act 2003
‘the Council’ refers to South Norfolk Council
‘the guidance’ refers to the revised guidance issued by the Home Office under s.182 of the Act.
‘licensed premises’ includes club premises and events unless the context otherwise requires.
‘the Licensing Authority’ refers to South Norfolk Council
‘operating schedule’ details how the applicant proposes to operate the premises when carrying out the relevant licensable activities

1. Introduction

South Norfolk Council is the licensing authority under the Act and is responsible for determining applications for premises licenses, club premises certificates, personal licenses and issuing temporary event notices in respect of the sale and/or supply of alcohol, the provision of regulated entertainment, the provision of relevant entertainment and late night refreshment throughout its area. The licensing authority also carries out an enforcement role for such licences/permits in the South Norfolk district.

South Norfolk Council is situated in the County of Norfolk, which contains seven District Councils in total. A map of the area is attached as Appendix D.

South Norfolk is a rural district covering approximately 90,765 hectares and with a population of over 129,000 (2014 ONS). The area is an attractive rural area of market towns and villages with approximately 57,880 dwellings and 6,000 businesses within the District. The main urban areas are the towns of Wymondham, Diss, Harleston, Loddon, Costessey and Hingham as well as the parish of Cringleford on the Norwich fringe and large villages including Hethersett, Long Stratton, Poringland and Mulbarton.

South Norfolk Council believes in excellent customer services that compliment people’s lives. This means responding to the area’s needs now and also planning for the future.

Our priorities are an example of this:

- enhancing our quality of life and the environment we live in;
- promoting a thriving local economy;
- supporting communities to realise their potential;
- driving services through being business like, efficient and customer aware.

2. Purpose and Scope of the Licensing Policy

This policy sets out the manner in which applications for licences required by the Act will be considered by the licensing authority.

This policy will not seek to introduce ‘zones’ where specific activities are concentrated.

The Act requires that the licensing authority carries out its various licensing functions so as to promote the following four licensing objectives:

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm.

The activities which require a licence under the provisions of the Act and which this policy statement covers include:

- the sale by retail of alcohol;
- the supply of alcohol by or on behalf of a club to, or to the order of, a member of the club;
- provision of late night refreshment between 11pm and 5am;
- provision of ‘regulated entertainment’ – (where the entertainment takes place in the presence of an audience and is provided for the purpose of entertaining that audience or where the activity takes place in private, be subject of a charge made with a view to profit) - consisting of:
  - a performance of a play;
  - an exhibition of a film;
  - an indoor sporting event;
• boxing or wrestling entertainment;
• a performance of live music;
• any playing of recorded music;
• a performance of dance;
• entertainment of a similar description to a performance of live music, any playing of recorded music or a performance of dance.


The Act requires that the licensing authority publish a ‘Statement of Licensing Policy’ that sets out the policies, which will generally be applied to promote the licensing objectives when making decisions on applications made under the Act.

This policy has been prepared in accordance with the provisions of the Act and having regard to the Home Office Guidance issued under Section 182 of the Act.

In accordance with the legislation the licensing authority will prepare and publish a policy every five years. During the five-year period the policy will be kept under review and this licensing authority may make such revisions as are considered appropriate at any time.

When determining applications for licences the licensing authority will have regard to this policy, to the guidance and to primary and secondary legislation.

Before publishing this policy statement and on any policy review the licensing authority will consult with the following –
• the chief officer of police for the area;
• the fire and rescue authority for the area;
• each local authority’s director of public health;
• persons/bodies representative of local premises licence holders;
• persons/bodies representative of local club premises certificate holders;

• persons/bodies representative of local personal licence holders; and
• persons/bodies representative of businesses and residents in its area.

A licensing authority is not precluded from consulting with other persons or bodies in addition to those it is required to consult with.

The views of the parties consulted have been given proper weighting.

3. Main principles of the policy

This Policy will not:
• undermine the rights of any person to apply under the Act for a variety of permissions and have each application considered on its individual merits;
• override the right of any person to make representations on any application or seek a review of a licence or certificate where they are permitted to do so under the Act.

Licensing is about the control of licensed premises and licensable activities therein (including outside events), qualifying clubs and temporary events within the terms of the Act, and conditions are likely to be attached to licences, certificates and permissions that will cover matters which are within the control of individual licensees.

The licensing authority will consider each application on its own merits and will not impose predetermined licensing opening hours.

Conditions on a premises licence or club premises certificate are important in setting the parameters within which premises can lawfully operate. Conditions must be tailored to the individual type, location and characteristics of the premises and events concerned. Standardised conditions should be avoided and indeed may be unlawful where they cannot be shown to be appropriate for the promotion of the licensing objectives in an individual case.

Supporting guidance issued by the Home Office provides template conditions which may be attached to a licence. Details can be found at www.gov.uk/government/uploads/system/uploads/attachment_data/file/181056/Pools_of_conditions_-_supporting_guidance.pdf. When considering conditions as a result of relevant representations the licensing authority
will focus primarily on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activity in the area concerned but will also have regard to the impact of persons attending licensed premises on the local community and environment. The licensing authority recognises that only conditions strictly appropriate to promote the licensing objectives should be attached to licences.

The licensing authority wishes to encourage the provision of a wide range of entertainment activities within the South Norfolk district and to promote live music, dance and theatre, etc. for the wider cultural benefit of the community. To avoid unnecessary and disproportionate measures that could deter live music, dancing and theatre by imposing indirect costs of a substantial nature, when considering conditions following relevant representations, for such events, the licensing authority recognises only appropriate, proportionate and reasonable conditions should be imposed.

The licensing authority will consider representations made to ensure that they are relevant and not repetitious, vexatious or frivolous.

Any petitions made in respect of an application must meet the following minimum requirements:

- It must be clear to which premises/application the petition relates;
- The petition must relate to one or more of the licensing objectives;
- Each page must include information as to the purpose of the petition (so it is clear signatories were aware what they were signing);
- Full names and addresses must be supplied, in a legible manner;
- It should be made clear to all signatories that a copy of the petition, containing their details will be passed to the applicant and contained within the committee papers, which, in the event of a hearing become public documents;
- The first named respondent is taken to be the instigator of the petition, and will be used as the point of contact in terms of any queries about the petition;
- The first named respondent will be expected to represent the signatories at a hearing and to communicate any information to other signatories as appropriate – the licensing authority will not contact each signatory as if they were making individual representations;

In the absence of any relevant representations or where representations have been made and subsequently withdrawn in respect of an application, the licensing authority is obliged to grant the licence and replicate the proposals contained in the operating schedule to promote the licensing objectives in the form of clear and enforceable conditions.

The council reserves the right to make such checks as to the validity of the petition signatories as it feels appropriate.

The licensing authority acknowledges that the licensing function cannot be used for the general control of nuisance and anti-social behaviour by individuals once they are away from the licensed premises and, therefore, beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned.

This policy statement will not seek to regulate matters which are provided for in any other legislation e.g. planning, health and safety,
employment rights, fire safety, environmental protection, except in so far as such matters should be regulated to achieve the four licensing objectives.

In this respect the licensing authority recognises that, apart from the licensing function, there are a number of other mechanisms available for addressing issues of unruly behaviour that can occur away from licensed premises, including:

- planning control;
- positive measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other departments of the local authority;
- the provision of CCTV surveillance in town centres, provision of public conveniences open late at night, street cleaning, litter patrols and taxi ranks;
- designation of parts of the district as places where alcohol may not be consumed publicly;
- regular liaison with Norfolk Constabulary on law enforcement issues regarding disorder and anti-social behaviour, including the issue of fixed penalty notices and prosecution of those selling alcohol to people who are intoxicated;
- Norfolk Constabulary powers of confiscation of alcohol from adults and children in designated areas and the closing down of licensed premises or temporary events on the grounds of disorder or likelihood of disorder or excessive noise from the premises;
- the power of Norfolk Constabulary, other responsible authorities or a local resident or business to seek a review of the licence or certificate;
- Raising a contribution to policing the late night economy through the Late Night Levy;
- Early Morning Alcohol Restriction Orders;
- Investigation of statutory nuisance complaints under the Environmental Protection Act 1990

4. Duplication

There are many stakeholders in the leisure industry, covering a wide range of disciplines. Many are involved, directly or indirectly, in the promotion of the licensing objectives, particularly those relating to the prevention of crime and disorder and public nuisance.

The licensing authority will arrange for protocols with Norfolk Constabulary to enable reporting to the authority responsible for transport matters on the need for the swift and safe dispersal of people from the town centres within the district to avoid concentrations of people, which can produce disorder and disturbance.

The licensing authority recognises the need to avoid so far as possible, duplication with other regulatory regimes. Whilst having regard to the planning regime, the licensing authority recognises that there should be a clear separation of the planning and licensing regimes.

The licensing authority will endeavour to minimise the burden of legislation on small businesses.

However, some regulations do not cover the unique circumstances of some entertainment and where relevant representations are received the licensing authority will consider attaching conditions to premises licences and club premises certificates, where these are necessary for the promotion of the licensing objectives and are not already provided for in any other legislation.

This policy recognises that The Equality Act 2010, places a legal obligation on public authorities to have due regard to the need to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different racial groups.

5. Cumulative Impact

“Cumulative impact” means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. The cumulative impact of licensed premises on the promotion of the licensing objectives is a matter for the licensing authority to consider in developing its licensing policy statement.

The licensing authority acknowledges that a concentration of licensed premises in a particular area can result in an increased number of people walking through or congregating in streets with the potential to increase crime, anti-social behaviour, noise pollution and other disturbance to residents. In
such cases the amenity of local residents can be placed under severe pressure but this may not be attributable to any individual premises.

The licensing authority will only adopt a special policy on cumulative impact if there is evidence that a significant number of licensed premises concentrated in one area are resulting in unacceptable levels of crime and disorder or public nuisance. The licensing authority, having regard to the evidence currently available, and being aware of other measures that are available to address such issues, considers that there is no particular part of the district causing a cumulative impact on any of the licensing objectives. However, the cumulative impact of licensed premises in a particular area may, at any time, on representation from residents, business or responsible authorities, trigger the consideration of whether any additional licences or substantial variations to existing licences, increasing such aspects as capacity or operating hours, would lead to an unacceptable saturation in an area. In such cases, the licensing authority will follow the procedure set out in the Home Office guidance to determine whether a special policy covering cumulative impact should be incorporated in this statement of licensing policy.

6. Early Morning Restriction Orders

The ability to implement an Early Morning Restriction Order or ‘EMRO’ is a power conferred on licensing authorities by the Police Reform and Social Responsibility Act 2011 (“the 2011 Act”), which enables licensing authorities to restrict the sale of alcohol in the whole or a part of their area between midnight and 6am on all or some days. Licensing authorities are able to make an EMRO in relation to problem areas if they have evidence that the order is appropriate for the promotion of the licensing objectives. It should be noted that the restriction would only relate to alcohol and would have no effect on regulated entertainment.

The licensing authority has no plan to implement any EMROs at the time of writing this policy. Any decision to implement an EMRO would be made by the Licensing, Appeals & Complaints Committee.

7. Late Night Levy

The power to implement a late night levy is also within the 2011 Act. This enables licensing authorities to charge a levy to persons who are licensed to sell alcohol late at night in the authority's area, as a means of raising a contribution towards the costs of policing the late-night economy. Any levy would have to apply to the entire Local Authority area.

The licensing authority has no plan to implement a Late Night Levy at the time of writing this policy. Any decision to implement a Late Night Levy would require consultation with the Police and Crime Commissioner and Chief Officer of Police, as well as a much broader consultation. Such a decision would be made by the Full Council.

8. Late Night Refreshment

The power to exempt premises, in certain circumstances, from the requirement to have a licence to provide late night refreshment has been provided at Paragraph 2A of Schedule 2 of the 2003 Act (as inserted by the Deregulation Act 2015). This enables licensing authorities to choose to apply an exemption specifically where the supply of late night refreshment takes place if it is:

a) on or from premises which are wholly situated in a designated area;
b) on or from premises which are of a designated description; or
c) during a designated period (beginning no earlier than 11pm, and ending no later than 5am)

Any decision to implement late night refreshment exemptions would be subject to a separate full consultation process.

9. The Prevention of Crime and Disorder

In addition to the requirements for the licensing authority to promote the licensing objectives, it also has a duty under Section 17 of the Crime and Disorder Act 1998 and the Violent Crime Reduction Act 2006 to do all it reasonably can to prevent crime and disorder in the South Norfolk district.
Licensed premises, especially those offering late night/early morning entertainment, alcohol and refreshment for large numbers of people, can be a source of crime and disorder.

The licensing authority will expect operating schedules to satisfactorily address these issues, from the design of the premises through to the daily operation of the business.

Applicants are recommended to seek advice from the Council’s Licensing Officers and Norfolk Constabulary as well as taking account, as appropriate, of local planning and transport policies, equalities schemes, tourism, cultural and crime prevention strategies when preparing their plans and operating schedules.

If an applicant does not address the prevention of crime and disorder objective it is likely that representations will be made. Where relevant representations are made the licensing authority will consider attaching conditions to licences to deter and prevent crime and disorder both inside and immediately outside the premises.

**Sale and use of new psychoactive substances (NPS) at alcohol licensed premises**

New psychoactive substances (NPS) mimic the effects of illegal drugs (like cocaine, cannabis and ecstasy) while being designed to evade controls. The sale of new psychoactive substances (NPS) – so called “legal highs” – is not regulated under the 2003 Act. The licensing authority will consider whether conditions are appropriate to prevent the sale of such products alongside the sale of alcohol at licensed premises, including at off-licences, or, for example, for on-trade premises to impose a door policy. Some NPS products may contain controlled drugs, and therefore be illegal, in which case the licensing authority will involve the Police and consider applying for a review of the premises licence on crime and disorder grounds. But some NPS are not illegal. There is evidence that such NPS products can cause harms, particularly if taken in combination with alcohol. Further information about NPS is on the Government’s “FRANK” website: http://www.talktofrank.com/.

The licensing authority will consider whether there is evidence that it would be appropriate to impose a condition of this kind specifically in order to promote one or more of the statutory licensing objectives, including public safety and protecting children from harm. Conditions must of course be tailored to the individual type, location and characteristics of the premises and events concerned and should be proportionate, justifiable and be capable of being met.

**10. Public Safety**

The Act covers a wide range of premises that require licensing, including cinemas, concert halls, theatres, nightclubs, public houses, village halls, cafes/restaurants and fast food outlets/takeaways.

Each of these types of premises presents a mixture of risks, with many common to most premises and others unique to specific operations. It is essential that premises are constructed or adapted, maintained and operated so as to acknowledge and safeguard occupants against these risks.

The licensing authority will expect operating schedules to satisfactorily address these issues, as appropriate, and applicants are advised to seek advice from the Council’s Health and Safety Officers and the County Fire Officer before preparing their plans and schedules.

If an applicant does not address the public safety objective it is likely that representations will be made. Where relevant representations are made the licensing authority will consider attaching conditions to licences to promote public safety.

Public safety includes the prevention of accidents and injuries and other immediate harms that can result from alcohol consumption such as unconsciousness or alcohol poisoning. Conditions relating to public safety may also promote the crime and disorder objective or nuisance objective. There will be occasions when a public safety condition could incidentally benefit a person’s health more generally, but it should not be the purpose of the condition.

Where security operatives/door supervisors are employed at licensed premises to carry out any security function they must be licensed by the Security Industry Authority (SIA). Competent and professional door supervisors are key to
public safety at licensed premises. If a licensee directly employs security operatives they will need to hold a non-frontline licence issued by the SIA. The relevant mandatory conditions will be imposed in all such cases.

11. The Prevention of Public Nuisance

Licensed premises, especially those operating late at night and in the early hours of the morning, can cause a range of nuisances impacting on people living, working or sleeping within the vicinity of the premises.

The problems caused relate, amongst other things, to litter, noise nuisance, light pollution and noxious smells. The licensing authority will expect operating schedules to satisfactorily address these issues, as appropriate. Applicants are advised to seek advice from the Council’s Community Protection Team before preparing their plans and schedules.

If an applicant does not address the prevention of public nuisance objective it is likely that representations will be made. Where relevant representations are made the licensing authority will consider attaching conditions to licences to promote the prevention of public nuisance.

12. The Protection of Children from Harm

The licensing authority considers the Norfolk Safeguarding Children’s Board to be the primary competent authority for matters relating to the protection of children from harm.

The wide range of premises that require licensing means that children can be expected to visit many of these, often on their own, for food and/or entertainment.

Many children go to see and/or take part in an entertainment arranged especially for them, for example children’s film shows and dance or drama school productions. Additional arrangements may be required to safeguard them while at the premises.

The licensing authority has a statutory obligation to ensure robust mechanisms are in place for safeguarding arrangements under Section 11 of the Children Act 2004. Therefore the licensing authority will judge the merits of each separate application before deciding whether to impose conditions limiting the access of children to individual premises. The following are examples of premises that will raise concern:

- where the supply of alcohol for consumption on the premises is the exclusive or primary purpose of the services provided at the premises;
- where there have been convictions for serving alcohol to minors or with a recorded history for underage drinking;
- where there is a known association with drug taking or dealing;
- where there is a strong element of gambling on the premises;
- where entertainment of an adult or sexual nature is provided.

The licensing authority may consider any of the following options when dealing with a licence application where limiting the access of children is considered necessary to prevent harm to children:

- limitations on the hours when children may be present;
- limitations on parts of the premises to which the children might be given access;
- limitations on ages below 18;
- limitations or exclusion when certain activities are taking place;
- requirements for an accompanying adult;
- full exclusion of people under 18 from the premises when any licensable activities are taking place.

No conditions will be imposed requiring that children be admitted to any premises and, where no limitation is imposed, this will be left to the discretion of the individual licensee.

The Act details a number of offences designed to protect children in licensed premises and the licensing authority will work closely with Norfolk Constabulary and the Trading Standards section of Norfolk County Council to ensure the appropriate enforcement of the law, especially relating to the sale and supply of alcohol to children.

Applicants may wish to consider including a statement within their operating schedule detailing how they will prevent underage
drinking at their premises. This may be incorporated within the applicant’s age verification policy.

The Act provides a legal responsibility to make sure that children, young people and vulnerable adults are protected from harm at licensed premises. The guidance requires that children must be protected from “physical, psychological and moral harm”, premises allowing persons under the age of 18 are expected to have systems in place to safeguard children and young people. For further details of the safeguarding of children in licensed premises please see the Child Sexual Exploitation Leaflet on the following webpage: https://www.safeguardingsheffieldchildren.org.uk/welcome/sheffield-safeguarding-children-board/children-licensed-premises/child-sexual-exploitation-and-hospitality-trade.html

Access to Cinemas

In the case of premises which are used for film exhibitions, mandatory conditions will apply restricting access to those who meet the required age limit in line with any certificate granted by the British Board of Film Classification or, in specific cases, a certificate given to the film by the licensing authority itself or any specified film classification body.

It may also be necessary to impose a condition to restrict the admission of children to theatres which are incorporating adult entertainment in their productions.

Adult Entertainment

Where regulated entertainment provided on premises is of an adult or sexual nature the licensing authority may, where relevant representations are received, give appropriate and additional consideration as to whether to grant a premises licence when the premises are in the vicinity of:

- residential housing
- schools
- play areas
- children’s nurseries or preschool facilities
- places of religious worship or education
- historic buildings
- tourist attractions
- predominantly family shopping areas
- community facilities or public buildings e.g. youth clubs, libraries & sports centres.

In so far as it relates to the licensing objectives, and taking into account location, the licensing authority may determine the nature of any external signage for premises providing adult entertainment. The licensing authority will also expect that the entertainment occurring on the premises should only be visible to those who have chosen to enter, regardless of the location.

The licensing authority is especially concerned that premises providing adult entertainment promote the protection of children from harm objective and will expect operating schedules to address this by adopting strict entrance policies, security measures and staff training and management policies to ensure that this and the other licensing objectives are promoted.

13. Planning

Planning and licensing regimes are separated to avoid duplication and inefficiency.

Licensing applications will not enable a “rerun” of the planning application and licensing decisions will not override decisions taken by the Planning Committee or permissions granted on appeal. There is no legal basis for the licensing authority to refuse a licence application on the basis of a planning permission or the lack of the same.

There are circumstances when as a condition of planning permission a terminal hour has been set for the use of premises for commercial purposes. Where these hours are different to the licensing hours, the applicant must observe the earlier closing time. Premises operating in breach of their planning permission would be liable to prosecution under planning law.

14. Temporary Event Notices

Certain temporary events are not required to be licensed but must be notified to the licensing authority as a temporary event notice. However, depending on the nature and location of such events, these can have serious crime and disorder and public nuisance implications. Organisers of these events are encouraged to submit their notification as soon as reasonably practicable to enable Norfolk Constabulary, community protection and the licensing authority to work with them to identify any risks.

A standard temporary event notice must be received a minimum of ten clear working days
prior to the event. A late temporary event notice must be submitted with a minimum of five clear working days and a maximum of nine clear working days prior to the event.

Should the notice be submitted in writing by post or hand delivery to the licensing authority, copies of the temporary event notice must also be served on Norfolk Constabulary and community protection. Where a notice is submitted electronically the applicant is not required to submit the notice on the responsible authorities as the licensing authority will submit this on their behalf. Where possible applicants are encouraged to submit their notices electronically.

15. Licensing Hours

The licensing authority recognises that flexible licensing hours for the sale of alcohol could avoid large numbers of people leaving premises at the same time which in turn could reduce the friction at late night fast food outlets, taxi ranks, minicab offices and other sources of transport that can lead to disorder and disturbance. Fixed trading hours within designated areas will not be set as this could lead to significant movements of people across boundaries at particular times seeking premises opening later, with the concentration of disturbance and noise. This would treat residents in one area less favourably than those in another, as well as causing the peaks of disorder and disturbance the Act is trying to avoid.

The licensing authority will deal with the issue of licensing hours having due regard to the individual merits of each application. However, consideration will be given to imposing stricter conditions in respect of noise controls where premises are situated in mainly residential areas, where relevant representations have been received.

The licensing authority will generally consider licensing shops, stores, and supermarkets to sell alcohol for consumption off the premises at any times they are open for (trade). However, this may be reconsidered where objections to those hours are raised by responsible authorities or interested parties on the basis of the licensing objectives.

16. Conditions

Conditions (other than statutory mandatory conditions) may only be attached to a licence or club premises certificate if relevant representations are received (except for conditions drawn from the applicant’s operating schedule since these are voluntary propositions).

Conditions attached to licences or certificates will be tailored to the individual style and characteristics of the particular premises and events concerned. The licensing authority will not impose blanket standard conditions.

However, where considered appropriate for the promotion of the licensing objectives, the licensing authority will consider attaching conditions to licences taking into account the principles as set out in section 1.16 of the guidance.

17. Licence Reviews

At any stage following the grant of a premises licence or club premises certificate, a responsible authority, to also include the licensing authority or interested party, may request that the licence be reviewed because of matters arising at the premises in connection with any of the four licensing objectives. In addition, Norfolk Constabulary may make an application for a summary review on the basis that premises are associated with serious crime and/or disorder.
Responsible authorities will aim to give licensees early warning of any concerns identified at the premises. The licensing authority can only initiate the review process when acting in its capacity as a responsible authority. The Authority’s role will be to administer the process and determine its outcome at a hearing where an evidential basis for the allegations made will need to be submitted.

It is expected that responsible authorities shall intervene where the basis of the intervention falls within the remit of that authority. For example, Norfolk Constabulary should take appropriate steps where the basis of the review is crime and disorder or the sexual exploitation of children or vulnerable adults.

A number of reviews may arise in connection with crime that is not directly linked to licensable activities. For example, reviews may arise because of drug problems at the premises; money laundering by criminal gangs, the sale of contraband or stolen goods, the sale of firearms or the sexual exploitation of children or vulnerable adults. It is not a matter for the licensing authority to judge the level of criminality, it is a matter for the courts.

In cases where the crime prevention objective is being undermined it is expected that revocation of the licence, even in the first instance, will be seriously considered.

18. Enforcement

Once licensed, it is essential that premises are maintained and operated so as to ensure the continued promotion of the licensing objectives and compliance with the specific requirements of the Act. The licensing authority will make arrangements to monitor premises and take appropriate enforcement action to ensure this.

The licensing authority works closely with Norfolk Constabulary and other enforcing authorities to ensure compliance with the Act. This provides for the targeting of agreed problems and high-risk premises but with a lighter touch being applied to those premises which are shown to be well managed and maintained.

All enforcement actions taken by the licensing authority will comply with the South Norfolk Council’s Corporate Enforcement Policy, the Better Regulation Delivery Office Regulator’s Code and Primary Authority Partnership Scheme. To this end the key principles of consistency, transparency and proportionality will be maintained.

A closure power is provided for in the Anti-social Behaviour, Crime and Policing Act 2014. This closure power can be used to protect victims and communities by quickly closing premises that are associated with nuisance or disorder. Further guidance on this power can be found on the gov.uk website, under the Anti-social Behaviour, Crime and Policing Act: anti-social behaviour guidance.

Please see www.south-norfolk.gov.uk/democracy/media/enforcement.pdf for a copy of our enforcement policy or contact the licensing authority.

19. Licence Fees

The licensing authority will suspend a premises licence or club premises certificate if the annual fee is not paid by the due date. However, if the payment was not made before or at the time of the due date because of an administrative error, or because the holder disputed liability for the fee before or at the time of the due date. There is a grace period of 21 days. This period is intended to allow the licensing authority and the licence or certificate holder an opportunity to resolve the dispute or error. If the dispute or error is not resolved during this 21 day period, the licence or certificate will be suspended.

Should a licence or certificate be suspended, the licensing authority will notify the holder in writing specifying the date on which the suspension will take effect; this date will be at least five clear working days after the day the authority gives the notice.

A suspension will cease to have effect on the day on which the licensing authority receives payment of the annual fee from the licence or certificate holder.

All responsible authorities will be informed of the suspension and removal of suspension.
20. Administration, Exercise and Delegation of Functions

The licensing authority will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.

Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, the Committee has delegated certain decisions and functions and has established a number of Sub-Committees to deal with them.

Furthermore, with many of the decisions and functions being purely administrative in nature, the grant of non-contentious applications, including for example, those licences and certificates where no representations have been made, are delegated to authorised officers within the licensing authority.

The table in Appendix A sets out the agreed main delegation of decisions and functions to Licensing Committee, Sub-Committees and officers. This form of delegations is without prejudice to officers referring an application to a Sub-Committee, or a Sub-Committee referring an application to Full Committee, if considered appropriate in the circumstances of any particular case.

21. Advice

Information and advice on all aspects of licensing can be obtained by:

- visiting the website at www.south-norfolk.gov.uk,
- telephoning the licensing team on (01508) 533621
- email to licensingteam@s-norfolk.gov.uk.
- appointment in person at South Norfolk House, Cygnet House, Long Stratton, Norwich, NR15 2XE during normal opening hours.

The Licensing Act 2003 and Guidance issued by under section 182 of the Act can be viewed on the Gov.uk website.
<table>
<thead>
<tr>
<th>Matter To Be Dealt With</th>
<th>Full Committee</th>
<th>Sub-Committee</th>
<th>Officers</th>
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<tbody>
<tr>
<td>Application for personal licence</td>
<td>If a Police objection made</td>
<td>If no objection made</td>
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<tr>
<td>Application for personal licence, with unspent convictions</td>
<td>All cases</td>
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<tr>
<td>Application for premises licence/club premises certificate</td>
<td>If a relevant representation made</td>
<td>If no relevant representation made</td>
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<tr>
<td>Application for provisional statement</td>
<td>If a relevant representation made</td>
<td>If no relevant representation made</td>
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<tr>
<td>Application to vary premises licence/club premises certificate</td>
<td>If a relevant representation made</td>
<td>If no relevant representation made</td>
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<tr>
<td>Application for a minor Variation (including decision whether to consult other responsible authorities)</td>
<td>All cases</td>
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<tr>
<td>Application to vary designated premises supervisor</td>
<td>If a Police objection</td>
<td>All other cases</td>
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<tr>
<td>Request to be removed as designated premises supervisor</td>
<td>All cases</td>
<td></td>
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<tr>
<td>Application for mandatory alcohol condition to be disapplied in respect of community premises</td>
<td>If a Police representation</td>
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<tr>
<td>Application for transfer of premises licence</td>
<td>If a Police representation</td>
<td>All other cases</td>
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<tr>
<td>Application for Interim Authority Notice</td>
<td>If a Police representation</td>
<td>All other cases</td>
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<tr>
<td>Application to review premises licence/club premises certificate</td>
<td>All cases</td>
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<tr>
<td>Decision on whether a complaint is irrelevant, frivolous, vexatious, etc.</td>
<td>All cases</td>
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<tr>
<td>Decision to object when local authority is a consultee and not the lead authority</td>
<td>All cases</td>
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<tr>
<td>Determination of a police representation to a temporary event notice</td>
<td>All cases</td>
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<tr>
<td>Consideration of Licensing Policy before Full Council</td>
<td>All cases</td>
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The Portman Group operates, on behalf of the alcohol industry, a Code of Practice on the naming, packaging and promotion of alcoholic drinks. The Code seeks to ensure that drinks are packaged and promoted in a socially responsible manner and only to those who are 18 years old or over. Complaints about products under the Code are considered by an Independent Complaints Panel and the Panel’s decisions are published.

If a product’s packaging or point-of-sale advertising is found to be in breach of the Code, the Portman Group may issue a Retailer Alert Bulletin to notify retailers of the decision and ask them not to replenish stocks of any such product or to display such point-of-sale material, until the decision has been complied with. The Code is an important weapon in protecting children from harm because it addresses the naming, marketing and promotion of alcohol products sold in licensed premises in a manner, which may appeal to or attract minors. The licensing authority commends the Code.
Appendix C - Responsible Authorities Contact Details

The Licensing Team
South Norfolk Council
Cygnet House, Long Stratton
Norwich, NR15 2XE
Tel: 01508 533621 Fax: 01508 533695
Email: licensingteam@s-norfolk.gov.uk

The Chief Officer of Police
Norfolk Constabulary
Bethel Street Police Station
Bethel Street
Norwich, NR2 1NN
Tel: 01603 276020 Fax: 01603 276025
Email: licensingteam@norfolk.pnn.police.uk

Norfolk Fire and Rescue Service
Norwich Road
Thetford
Norfolk
IP21 2HT

Health and Safety
South Norfolk Council
Environmental Health & Safety Dept.
Cygnet House
Long Stratton
Norwich, NR15 2XE

Environmental Protection
South Norfolk Council
Community Protection Team
Cygnet House
Long Stratton
Norwich, NR15 2XE

Planning Authority
South Norfolk Council
Planning Dept.
Cygnet House
Long Stratton
Norwich, NR15 2XE

Child Protection
Norfolk Safeguarding Children Board
Room 60, Lower Ground Floor
County Hall
Martineau Lane
Norwich, NR1 2DH

Trading Standards
Norfolk Trading Standards
Norfolk County Council
County Hall
Martineau Lane
Norwich, NR1 2UD

Public Health
Public Health Director
Norfolk County Council
County Hall
Martineau Lane
Norwich, NR1 2DH
Appendix B - List of those consulted

The Chief Officer of Police
Norfolk Fire & Rescue
Public Health
Child Protection
Trading Standards
Health & Safety
Environmental Protection
Planning

Premises Licence Holders & Club Certificate Holders

Arts Council England
Association of Convenience Stores
Association of Licensing Multiple Retailers
British Beer & Pub Association
British Board of Film Classification
British Hospitality Association
British Institute of Inn Keeping
British Retail Consortium
Broads Authority
Business Forums – Diss, Harleston, Loddon & Wymondham

Campaign for Real Ale
Circus Arts Forum Ltd
Citizens Advice Bureau – Diss, Harleston, Norwich, Wymondham
Creative Arts East
Equity
Federation of Licensed Victuallers Associations
Institute of Licensing
MP Richard Bacon
Musicians Union
Norfolk Association of Local Councils
Norfolk Association of Village Halls
Norfolk Chamber of Commerce
The Portman Group
UK Cinema Association Ltd
Wine & Spirit Trade Association
Working Mens Club & Institute Union Ltd

District Members
Parish Clerks
NPLaw
Appendix C - Representations

- Norfolk Association of Village Halls
- Wymondham Town Council
- Costessey Town Council
Amanda Cox

From: Lawrence Wilkinson [mailto:sjimw Wilkinson navh@gmail.com]
Sent: 01 September 2015 14:21
To: Licensing Team
Subject: Review of Licensing Policy 2003 Act

There is nothing in your policy to require the propose premises user to inform the premises licence holder,
or the premises owner/ management at the same time as the police and community safety when applying
for temporary event notice. It could be possible to book a hall for an event and not mention that there is
going to be a pay bar when the booking is made. The management may have already agreed to, or had 12
TE Ns.

Mr. L. Wilkinson Secretary, Norfolk Association of Village Halls, 21 Archdale Street, King’s Lynn PE30
1QY
Good Morning Amanda

Thank you for the email below.

This has now been discussed by the Councils Planning Lighting & Highways Committee and they have no comments to make.

Many thanks

Trevor Gurney
Town Clerk
Wymondham Town Council

On 01/09/2015 08:53, Amanda Cox wrote:

Good Morning

The Licensing Act 2003 and Gambling Act 2005 requires each licensing authority throughout England and Wales to review their Statement of Policies every three and five years respectively. South Norfolk’s current policies are due to expire and therefore we are required to carry out reviews of the policies which includes consultation. In addition the Gambling Act 2005 has introduced Local Area Profiles which is included in the Statement of Gambling Policy at appendix C.

The Acts provide who must be consulted during the review process, however we have decided to widen the consultation and include Parish Councils.

The consultation period begins on the 1 September 2015 closing on the 12 October 2015. Copies of the revised policies can be found on our website at:

http://www.south-norfolk.gov.uk/environment/1801.asp

http://www.south-norfolk.gov.uk/democracy/778.asp

At the end of the consultation period, any comments received will be considered and if necessary the policies will be amended. The policies will be taken to Full Council on the 14 December 2015.

Should you have any queries please do not hesitate to contact me.

Kind regards
Wymondham Town Council
14 Middleton Street
Wymondham
Norfolk
NR18 0AD
Tele 01953 603302

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Dear Amanda

Costessey TC has considered both the Gambling & Licensing documents.

Our comments are as follows:

**Licensing Policy:** No objections or alterations needed, but Councillors asked for clarification of the use of SIA trained security staff – eg if our caretakers ask a hirer to turn the music down or if we want a guest list to show the licensee at a party do the caretakers need to be SIA checked / trained?

Please could we also have a list of SNC officers who deal with enforcement issues and a phone no. for noise complaints etc?

**Gambling Act 2005 Statement Policy:** No objections to the statement, but the Norwich South MP, Clive Lewis representing New Costessey Ward, is missing from the list of those consulted on the final page (p35). Surely if Richard Bacon has been consulted then Clive Lewis should be too?

Many thanks

Hilary Elias
Clerk to Costessey Town Council, The Costessey Centre, Longwater Lane, Costessey, Norwich. NR8 5AH. Tel: 01603 742958

The contents of this e-mail are confidential. If you are not the intended recipient, please notify the sender and delete the e-mail.

Amanda Cox

From: Amanda Cox <mailto:ACox@s-norfolk.gov.uk>
Sent: 01 September 2015 08:53
To: Parish Clerks <ParishClerks@s-norfolk.gov.uk>
Subject: Statement of Licensing Policy, Statement of Gambling Policy & Local Area Profile

Good Morning

The Licensing Act 2003 and Gambling Act 2005 requires each licensing authority throughout England and Wales to review their Statement of Policies every three and five years respectively. South Norfolk’s current policies are due to expire and therefore we are required to carry out reviews of the policies which includes consultation. In addition the Gambling Act 2005 has introduced Local Area Profiles which is included in the Statement of Gambling Policy at appendix C.
The Acts provide who must be consulted during the review process, however we have decided to widen the consultation and include Parish Councils.

The consultation period begins on the 1 September 2015 closing on the 12 October 2015. Copies of the revised policies can be found on our website at:

http://www.south-norfolk.gov.uk/environment/1801.asp

http://www.south-norfolk.gov.uk/democracy/778.asp

At the end of the consultation period, any comments received will be considered and if necessary the policies will be amended. The policies will be taken to Full Council on the 14 December 2015.

Should you have any queries please do not hesitate to contact me.

Kind regards

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Licensing and Enforcement Officer
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Statement of Gambling Policy

Report of the Licensing & Enforcement Officer
Cabinet Member: Lee Hornby

CONTACT
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1. Introduction

1.1. The Gambling Act 2005 (the Act) came into effect in 2007 and imposes a duty on South Norfolk Council as the licensing authority for licensable activities taking place within the district.

2. Background

2.1. The legislation provides a clear focus on the promotion of three statutory objectives which must be addressed when licensing functions are undertaken:

- preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;
- ensuring that gambling is conducted in a fair and open way;
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

2.2. Licensing authorities have responsibility for licensing gambling premises within their area, as well as undertaking functions in relation to lower stake gaming machines in club premises. The Act also provides a system of temporary and occasional use notices. This enables licensing authorities to authorise premises where there is no gambling premises licence in place, to be used for certain types of gambling for limited periods.
2.3. The Act requires a licensing authority to determine and publish a statement of its licensing policy at least once every three years. The policy must be published before it carries out any licensing functions under the Act. A copy of the proposed policy is attached at Appendix A.

2.4. To ensure a consistent approach across the county to the interpretation of the Gambling Act and subsequent issued guidance a Norfolk wide working group was set up to prepare the revised Statement of Policy. The draft policy was then reviewed by NPLaw prior to consultation.

2.5. Before determining the policy, the licensing authority must consult the persons listed in section 349(3) of the Act. These are:
   - the chief officer of police for the area;
   - one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority’s area;
   - one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority’s functions under the Act.

2.6. It was decided to widen the consultation from that provided by the Act to include those we felt may be affected or otherwise have an interest in the policy. A list of those consulted is attached at Appendix B. The consultation took place between the 1 September 2015 and 12 October 2015. The draft policy was also available on South Norfolk Council’s website and reception area and at each library within the district for the full consultation period.
2.7. The views of all these persons or bodies should be considered when the policy is determined.

3. Current Position / Findings

3.1. Four representations were received and considered during the consultation period as follows:

<table>
<thead>
<tr>
<th>Party</th>
<th>Summary of Representations</th>
<th>Proposed Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wymondham Town Council</td>
<td>No comment</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Costessey Town Council</td>
<td>No objections</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Coral Racing Ltd</td>
<td>Supportive of the document</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Gosschalks on behalf of the Association of British Bookmakers</td>
<td>1. Typographical error</td>
<td>1. Amended</td>
</tr>
<tr>
<td></td>
<td>2. The policy should be clear that additional conditions will only be imposed by the licensing authorities where there is evidence of a need to do so.</td>
<td>2. We feel the policy is clear with regard to any conditions being appropriate and proportionate. However in light of the representation the policy has been amended under the section relating to conditions to commence “Further to the mandatory and default conditions, additional conditions may be attached based on a case by case basis.”</td>
</tr>
</tbody>
</table>

South Norfolk Council
3. Expansion of decision making paragraph regarding the likelihood of planning or building regulation approval not being considered by a licensing committee when determining a Gambling Act 2005 application.

3. The policy provides a section regarding duplication with other regulatory regimes. No further amendments to the policy necessary.

4. Location paragraph appears to implement a cumulative impact type policy.

4. To address this point the policy has been amended to read “This licensing authority is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision-making. As per the guidance, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. It should be noted that any application being made will be decided on its merits.”

5. Provision of a clear statement that issues of nuisance are not relevant criteria for consideration.

5. We disagree that issues of nuisance are not relevant criteria. To add clarity the policy has been amended to read “This licensing authority is aware of the distinction between disorder and
nuisance and will generally consider disorder as an activity that is more serious and disruptive than mere nuisance. We will consider factors (for example whether police assistance was required and how threatening the behaviour was to those who could see it) so as to make that distinction.”

| 6. Local Area Profile – The advertising of gambling premises is not an issue for consideration by the licensing authority. |
| 6. Having taken into account Section 6.50 of the Gambling Act Guidance to Licensing Authorities 5th Edition we believe no further amendment is necessary. It is for licensees to ensure they have sufficient controls in place to mitigate risks by taking appropriate steps to ensure that advertising relating to their premises, or relating to events at their premises, is not displayed at a time when children are likely to be near the premises. |

3.2. A copy of the representations are attached at Appendix C.

3.3. Amendments to the draft policy following the received representations have been reviewed by NPLaw.
3.4. During the consultation process, the Gambling Commission issued updated guidance (Guidance to Licensing Authorities 5th Edition). Drivers for the proposed amendments to the guidance are to:

- reflect recent changes to the social responsibility provisions within the Commission’s Licence conditions and codes of practice
- promote local partnership working between licensing authorities and local gambling operators to facilitate a coordinated approach to local issues
- provide greater clarity about the wide range of powers afforded to licensing authorities to manage local gambling regulation through measures such as their statements of licensing policy.

3.5. Once the Statement of Policy has been adopted, it must be published for 28 days before it takes effect at South Norfolk Council offices, on our website and in each local library. In addition a notice must be placed in the local press on one occasion during the four week period.

3.6. The revised Statement of Policy must take effect on the 31 January 2016.

4. Proposals

4.1. To adopt the Statement of Gambling Policy including the Local Area Profile to enable a consistent approach to the licensing authorities duties under the Act.
5. Risks and Implications arising

5.1. The Act requires a published statement of gambling policy to enable the authority to carry out licensing functions under the Act. A decision not to publish this policy may result in activities being carried out in South Norfolk which could impact on the licensing objectives, as detailed in paragraph 2.1 above.

6. Recommendation

6.1. To recommend that Council adopts the Statement of Policy, as set out in Appendix A, and authorises the Director of Growth and Localism to carry out all regulatory processes to enable the policy to come into effect on the 31 January 2016.
Gambling Act 2005
Statement of Policy
31 January 2016
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Definitions

Note: In this policy, the following definitions are included to provide an explanation of certain terms included in the Gambling Act 2005 and therefore in the policy. In some cases they are an abbreviation of what is stated in the Gambling Act 2005 or an interpretation of those terms. For a full definition of the terms used, please refer to the Gambling Act 2005.

‘the Act’ refers to the Gambling Act 2005
‘the Council’ refers to South Norfolk Council
‘the guidance’ refers to the Gambling Commission’s Guidance to Licensing Authorities 5th Edition
‘the licensing authority’ refers to South Norfolk Council

1. The Objectives

In exercising most of their functions under the Act, licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

It should be noted that the Gambling Commission has stated: “The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling”.

This licensing authority is aware that, as per Section 153 of the Act, in making decisions about premises licences and temporary use notices it shall aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives and
- in accordance with the authority’s statement of licensing policy
- in accordance with the authority’s local area profile – provided at Appendix C

2. Introduction

South Norfolk Council is situated in the County of Norfolk, which contains seven District Councils in total. A map of the area is attached as Appendix A.

South Norfolk is a rural district covering approximately 90,765 hectares and with a population of over 129,000 (2014 ONS). The area is an attractive rural area of market towns and villages with approximately 57,880 dwellings and 6,000 businesses within the District. The main urban areas are the towns of Wymondham, Diss, Harleston, Loddon, Costessey and Hingham as well as the parish of Cringleford on the Norwich fringe and large villages including Hethersett, Long Stratton, Poringland and Mulbarton.
South Norfolk Council believes in excellent customer services that compliment people’s lives. This means responding to the area’s needs now and also planning for the future. Our priorities are an example of this:

- enhancing our quality of life and the environment we live in;
- promoting a thriving local economy;
- supporting communities to realise their potential;
- driving services through being business like, efficient and customer aware.

Licensing authorities are required by the Act to publish a statement of the principles which they propose to apply when exercising their functions. This statement must be published at least every three years. The statement must also be reviewed from “time to time” and any amended parts re-consulted upon. The statement must be then re-published. South Norfolk Council consulted widely upon this statement before finalising and publishing it. A list of those persons consulted is provided as Appendix D.

The Act requires that the following parties are consulted by licensing authorities:

- The Chief Officer of Police;
- One or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority’s area;
- One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority’s functions under the Act.

Our consultation took place between 1 September 2015 and 12 October 2015 and we followed the Cabinet Office Guidance on Consultation (published 5 November 2013), which is available at:


Should you have any comments as regards this policy statement please send them via e-mail or letter to the following contact:

Name: Amanda Cox
Address: South Norfolk Council, Cygnet House, Long Stratton, Norwich, NR15 2XE
E-mail: licensingteam@s-norfolk.gov.uk

The draft policy was presented for approval at a meeting of the Full Council on the 14 December 2015.

The approved policy was published by 31 December 2015, and will be available at the South Norfolk Council offices, on our website and in libraries within the district, and comes into effect on 31 January 2016.

It should be noted that this policy statement will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence where provision has been made for them to do so, as each will be considered on its own merits and according to the relevant statutory requirements including the Act.

3. Declaration

In producing the final statement, this licensing authority declares that it has had regard to the licensing objectives of the Act, the guidance and any responses from those consulted on the statement.

4. Responsible Authorities

The licensing authority is required by regulations to state the principles it will apply in exercising its powers under section 157(h) of the Act to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:

- the need for the body to be responsible for an area covering the whole of the licensing authority’s area; and
- the need for the body to be answerable to democratically elected persons, rather than
any particular vested interest group. In accordance with the suggestion in the guidance, this authority designates the Local Safeguarding Children Board for this purpose.

The contact details of all the Responsible Authorities under the Act are available via the website at www.south-norfolk.gov.uk

5. Interested Parties

Interested parties can make representations about licence applications, or apply for a review of an existing licence. These parties are defined in section 158 of the Act as follows:

“For the purposes of this Part a person is an interested party in relation to a premises licence or in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the application is made, the person-

a) lives sufficiently close to the premises to be likely to be affected by the authorised activities,

b) has business interests that might be affected by the authorised activities,

c) represents persons who satisfy paragraph (a) or (b)”

The licensing authority is required by regulations to state the principles it will apply in exercising its powers under the Act to determine whether a person is an interested party in relation to a premises licence, or an application for or in respect of a premises licence. The principles are:

Each case will be decided upon its merits. This authority will not apply a rigid rule to its decision making. It will consider the examples of considerations provided in the guidance at 8.9 to 8.17.

Interested parties can be persons who are democratically elected such as councillors and MP’s. No specific evidence of being asked to represent an interested person will be required as long as the councillor/MP represents the ward likely to be affected. Likewise, parish councils likely to be affected will be considered to be interested parties. Other than these however, this authority will generally require written evidence that a person/body (e.g. an advocate / relative) ‘represents’ someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation is sufficient.

If individuals wish to approach councillors to ask them to represent their views then care should be taken that the councillors are not part of the Licensing Committee dealing with the licence application. If there are any doubts then please contact the licensing team.

6. Exchange of Information

Licensing authorities are required to include in their statements the principles to be applied by the authority in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information with the Gambling Commission, and the functions under section 350 of the Act with the respect to the exchange of information with other persons listed in Schedule 6 to the Act.

The principle that this licensing authority applies is that it will act in accordance with the provisions of the Act in its exchange of information which includes the provision that the Data Protection Act 1998 will not be contravened. The licensing authority will also have regard to any Guidance issued by the Gambling Commission to licensing authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Act.

Should any protocols be established as regards information exchange with other bodies then they will be made available.

7. Enforcement

Licensing authorities are required by regulation
under the Act to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.

This licensing authority’s principles are that: It will be guided by the guidance and will endeavour to be:

- Proportionate: regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
- Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- Consistent: rules and standards must be implemented fairly;
- Transparent: regulators should be open, and keep regulations simple and user friendly; and
- Targeted: regulation should be focused on the problem, and minimise side effects.

As per the guidance this licensing authority will endeavour to avoid duplication with other regulatory regimes so far as possible.

This licensing authority has adopted and implemented a risk-based inspection programme, based on:

- The licensing objectives
- Relevant codes of practice
- The guidance, in particular at Part 36
- The principles set out in this statement of licensing policy

This may include test purchasing activities to measure the compliance of licensed operators with aspects of the Act. When undertaking test purchasing activities, this licensing authority will undertake to liaise with the Gambling Commission and the operator to determine what other, if any, test purchasing schemes may already be in place. Irrespective of the actions of an operator on their overall estate, test purchasing may be deemed to be an appropriate course of action.

The main enforcement and compliance role for this licensing authority in terms of the Act is to ensure compliance with the premises licences and other permissions, which it authorises. The Gambling Commission is the enforcement body for the operating and personal licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines are not dealt with by the licensing authority but should be notified to the Gambling Commission.

This licensing authority also keeps itself informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of local authorities.

Bearing in mind the principle of transparency, this licensing authority’s enforcement/compliance protocols/written agreements are available upon request to the licensing team.

In respect of the institution of criminal proceedings the Council will consider the contents of the Code for Crown Prosecutors.

8. Licensing Authority Functions

Licensing Authorities are required under the Act to:

- be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences
- issue Provisional Statements
- regulate members’ clubs and miners’ welfare institutes who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
- issue Club Machine Permits to Commercial Clubs
- grant permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres
- receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
- issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed
• register Small Society Lotteries below prescribed thresholds
• issue Prize Gaming Permits
• receive and endorse Temporary Use Notices
• receive Occasional Use Notices
• provide information to the Gambling Commission regarding details of licences issued (see section above on ‘information exchange’)
• maintain registers of the permits and licences that are issued under these functions

It should be noted that licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via operating licences.

Part B
Premises Licences: Consideration Of Applications

1. General Principles

Premises licences are subject to the requirements set out in the Act and regulations, as well as specific mandatory and default conditions, which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others. Please see page 11 for further details regarding conditions.

Decision making

This Licensing authority is aware that in making decisions about premises licences it shall aim to permit the use of premises for gambling in so far as it thinks it is:
(a) in accordance with any relevant code of practice issued by the Gambling Commission;
(b) in accordance with any relevant guidance issued by the Gambling Commission;
(c) reasonably consistent with the licensing objectives, subject to (a) and (b) above; and
(d) in accordance with the authority’s statement of licensing policy, subject to (a), (b) and (c) above.

It is appreciated that as per the guidance “moral or ethical objections to gambling are not a valid reason to reject applications for premises licences” (except as regards any ‘no casino resolution’ - see section on Casinos below) and also that unmet demand is not a criterion for a licensing authority.

This licensing authority also notes Gambling Commission guidance on Appropriate Licensing Environment (previously known as primary gambling activity).

It is not permissible for an operator to offer gaming machines on a premises which is licensed for non-remote betting but not to offer sufficient facilities for non-remote betting. A non-remote betting operating licence authorises its holder to ‘provide facilities for betting’ (s.65(2)(c) of the Act). Likewise, a betting premises licence authorises premises to be used for ‘the provision of facilities for betting…’ (s.150(1)(e) of the Act). The ability to make up to four gaming machines, within categories B2 – D, available is an additional authorisation conferred upon the holder of a betting premises licence (s.172(8) of the Act); it is not a free standing right to make gaming machines available for use. It follows that unless a betting premises operator offers sufficient facilities for betting it should not be making gaming machines available on the premises in question.

This authority notes the Commission’s view that it is also important, in relation to the licensing objective of protecting vulnerable persons from being harmed or exploited by gambling, that customers should be offered a balanced mix of betting and gaming machines in licensed betting premises.

Accordingly, an operating licence condition provides that gaming machines may be made available for use in licensed betting premises only at times when there are also sufficient facilities for betting available. In this respect, such facilities must include information that enables customers to access details of events on which bets can be made, make such bets,
learn of the outcome and collect any winnings.

**Definition of “premises”**

In the Act, “premises” is defined as including “any place”. Section 152 therefore prevents more than one premises licence applying to any place. But a single building could be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, the licensing authority shall pay particular attention if there are issues about sub-divisions of a single building or plot and shall ensure that mandatory conditions relating to access between premises are observed.

The Gambling Commission states in the guidance that: “In most cases the expectation is that a single building / plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises.”

This licensing authority takes particular note of the guidance which states that: licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular they should be aware of the following:

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating.
- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not “drift” into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.
- Customers should be able to participate in the activity names on the premises licence.

The Guidance also gives a list of factors, which the licensing authority should be aware of, which may include:

- Do the premises have a separate registration for business rates
- Is the premises’ neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

This authority will consider these and other relevant factors in making its decision, depending on all the circumstances of the case.

**The Gambling Commission’s Guidance as to relevant access provisions for each premises type are reproduced below:**

**Casinos**

- The principal access entrance to the premises must be from a street
- No entrance to a casino must be from premises that are used wholly or mainly by
children and/or young persons
• No customer must be able to enter a casino directly from any other premises which holds a gambling premises licence

Adult Gaming Centre
• No customer must be able to access the premises directly from any other licensed gambling premises

Betting Shops
• Access must be from a street or from another premises with a betting premises licence
• No direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind and you could not have a betting shop at the back of a café – the whole area would have to be licensed.

Tracks
• No customer should be able to access the premises directly from:
  - a casino or an adult gaming centre

Bingo Premises
• No customer must be able to access the premise directly from:
  - a casino
  - an adult gaming centre
  - a betting premises, other than a track

Family Entertainment Centre
• No customer must be able to access the premises directly from:
  - a casino
  - an adult gaming centre
  - a betting premises, other than a track

The guidance contains further information on this issue, which this authority will also take into account in its decision-making.

Premises “ready for gambling”

The guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

If the construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them, then an application for a provisional statement should be made instead.

In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, this authority will determine applications on their merits, applying a two stage consideration process:-

• First, whether the premises ought to be permitted to be used for gambling
• Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

Applicants should note that this authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

More detailed examples of the circumstances in which such a licence may be granted can be found in the guidance.
Location

This licensing authority is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision-making. As per the guidance, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. It should be noted that any application being made will be decided on its merits.

Planning

The guidance states: In determining applications the licensing authority has a duty to take into consideration all relevant matters and not to take into consideration any irrelevant matters, i.e. those not related to gambling and the licensing objectives. One example of an irrelevant matter would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal. Licensing authorities should bear in mind that a premises licence, once it comes into effect, authorises premises to be used for gambling. Accordingly, a licence to use the premises for gambling should only be issued in relation to the premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

This authority will not take into account irrelevant matters as per the above guidance. In addition this authority notes the following excerpt from the guidance:

When dealing with a premises licence application for finished buildings, the licensing authority should not take into account whether those buildings have or comply with the necessary planning or building consents. Nor should fire or health and safety risks be taken into account. Those matters should be dealt with under relevant planning control and building regulation powers, and not form part of the consideration for the premises licence. Section 210 of the 2005 Act prevents licensing authorities taking into account the likelihood of the proposal by the applicant obtaining planning or building consent when considering a premises licence application. Equally the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

Duplication with other regulatory regimes

This licensing authority seeks to avoid any duplication with other statutory / regulatory systems where possible, including planning. This authority will not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it. It will though, listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise.

When dealing with a premises licence application for finished buildings, this authority will not take into account whether those buildings have to comply with the necessary planning or buildings consents. Fire or health and safety risks will not be taken into account, as these matters are dealt with under relevant planning control, buildings and other regulations and must not form part of the consideration for the premises licence.

Local Risk Assessments

The Gambling Commission has introduced provisions in its social responsibility code within the Licence Conditions and Codes of Practice (LCCP), which require gambling operators to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate those risks. The introduction of new provisions in the social responsibility code within the LCCP encourages local authorities, the Commission
and the industry to work in partnership to address local issues and concerns. These changes take effect from 6 April 2016.

Licensees must review (and update as necessary) their local risk assessments:

- to take account of significant changes in local circumstances, including those identified in a licensing authority’s statement of licensing policy;
- when there are significant changes at a licensee’s premises that may affect their mitigation of local risks;
- when applying for a variation of a premises licence; and in any case, undertake a local risk assessment when applying for a new premises licence.

Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

It is expected that licensees will refer to the Licensing Authority’s Local Area Profile when complying their risk assessments, a copy can be found at Appendix C.

**Licensing objectives**

Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, this licensing authority has considered the guidance and some comments are made below.

**Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime** - This licensing authority is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known levels of organised crime this authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors. This licensing authority is aware of the distinction between disorder and nuisance and will generally consider disorder as activity that is more serious and disruptive that mere nuisance. We will consider factors (for example whether police assistance was required and how threatening the behaviour was to those who could see it) so as to make that distinction.

**Ensuring that gambling is conducted in a fair and open way** - This licensing authority has noted that the Gambling Commission states that it does not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. It is likely to be a mater addressed via operating or personal licences. However, suspicions that gambling is not being conducted in a fair and open way should be brought to the attention of the Commission. (There is however more of a role with regard to tracks – see ‘tracks’ section below).

**Protecting children and other vulnerable persons from being harmed or exploited by gambling** - This licensing authority has noted the guidance states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The licensing authority will therefore consider whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances / machines, segregation of areas, etc.

This licensing authority is also aware of the Gambling Commission Codes of Practice as regards this licensing objective, in relation to specific premises.

As regards the term “vulnerable persons” it is noted that the Gambling Commission does not seek to offer a definition but states that “it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who are gambling beyond
their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.” This licensing authority will consider this licensing objective on a case-by-case basis.

**Conditions**

Further to the mandatory and default conditions, additional conditions may be attached based on a case by case basis.

Any conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building suitable as a gambling facility;
- directly related to the premises and the type of licence applied for;
- fairly and reasonably related to the scale and type of premises; and
- reasonable in all other respects.

Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures this Licensing Authority will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas etc. There are specific comments made in this regard under some of the licence types below. This licensing authority will also expect the licence applicant to offer his/her own suggestions as to way in which the licensing objectives can be met effectively.

This licensing authority will also consider specific measures, which may be required for buildings, which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives.

This authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults are admitted to the area where these machines are located;
- access to the area where the machines are located is supervised;
- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
- at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

These considerations will apply to premises including buildings where multiple premises licences are applicable.

This licensing authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. This licensing authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

It is noted that there are conditions which the licensing authority cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Act specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated; and
- conditions in relation to stakes, fees, winning or prizes.

**Door Supervisors**

The Gambling Commission advises in its
guidance that if a licensing authority is concerned that a premises may attract disorder or be subject to attempts at unauthorised access (for example by children and young persons) then it may require that the entrances to the premises are controlled by a door supervisor, and is entitled to impose a condition on the premises licence to this effect.

Where it is decided that supervision of entrances / machines is appropriate for particular cases, a consideration of whether these need to be SIA licensed or not will be necessary. It will not be automatically assumed that they need to be licensed, as the statutory requirements for different types of premises vary (as per the guidance).

2. Adult Gaming Centres

This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

This licensing authority may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets / help-line numbers for organisations such as GamCare.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

This licensing authority will refer to the Commission’s website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. This licensing authority will also make itself aware of any mandatory or default conditions on these premises licences, when they have been published.

4. Casinos

This licensing authority has not passed a ‘no casino’ resolution under Section 166 of the Act, but is aware that it has the power to do so. Should this licensing authority decide in the future to pass such a resolution, it will
5. Bingo premises

This licensing authority notes that the guidance states:

Licensing Authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences, for that or those excluded areas.

An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bing premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises.

6. Betting premises

The Act contains a single class of licence for betting premises although within this, there are different types of premises which require licensing.

The Act also permits betting intermediaries to operate from premises. The Act defines a betting intermediary as a person who provides a service designed to facilitate the making or acceptance of bets between others. Although betting intermediaries usually offer their services via remote communication, such as the internet, a betting intermediary can apply for a betting premises licence to offer intermediary services upon the premises, such as a premises based trading room.

Licensing authorities are responsible for issuing and monitoring premises licences for all betting premises. Please see Part 7 of the guidance for further information on the issuing of premises licences.

Self Service Betting Terminals (SSBTs)

S.235(2)(c) provides that a machine is not a gaming machine if by reason only of the fact it is designed or adapted for use to bet on future real events. Some betting premises may make available machines that accept bets on live events, such as horse racing, as a substitute for placing a bet over the counter. These SSBTs are not gaming machines and therefore neither count towards the maximum permitted number of gaming machines, nor have to comply with any stake or prize limits. SSBTs merely automate the process that can be conducted in person and the Act exempts them from regulation as a gaming machine.

However, where a machine is made available to take bets on virtual races (that is, results and / or images generated by computer to resemble races or other events) that machine is a gaming machine and counts towards the maximum
permitted number of gaming machines, and must meet the relevant category limitations for the premises.

The authority notes that it is the Commission’s view that the use of SSBTs is a form of remote communication and that a remote licence will be required if SSBTs are used to facilitate the making or accepting of bets by others.

S.181 contains an express power for licensing authorities to restrict the number of SSBTs, their nature and the circumstances in which they are made available by attaching a licence condition to a betting premises licence or to a casino premises licence (where betting is permitted in the casino).

7. Tracks

This Licensing Authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the guidance, this licensing authority will especially consider the impact upon the third licensing objective (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

This authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

This licensing authority may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets / help-line numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

Gaming machines - Where the applicant holds a pool betting operating licence and is going to use the entitlement to four gaming machines, machines (other than category D machines) should be located in areas from which children are excluded.

Betting machines - This Licensing Authority will, as per the guidance, take into account the size of the premises and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator proposes to offer.

Applications and plans

The Act (s151) requires applicants to submit plans of the premises with their application, in order to ensure that the licensing authority has the necessary information to make an informed judgement about whether the premises are fit for gambling. The plan will also be used for the licensing authority to plan future premises inspection activity.

Plans for tracks do not need to be in a particular scale, but should be drawn to scale and should be sufficiently detailed to include the information required by regulations.

This authority appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties...
associated with pinpointing exact locations for some types of track. This licensing authority will need to satisfy themselves that the plan provides sufficient information to enable them to assess an application.

8. Travelling Fairs

Travelling fairs may provide an unlimited number of Category D gaming machines provided that facilities for gambling amount to no more than an ancillary amusement at the fair. They do not require a permit to provide these gaming machines but must comply with legal requirements about how the machine operates. Current stakes and prizes can be found at Appendix B of the guidance. Higher stake category B and C fruit machines, like those typically played in arcades and pubs, are not permitted. Fairground operators must source their machines from a Commission licensed supplier and employees working with gaming machines must be at least 18 years old.

This licensing authority is responsible for deciding whether, where category D machines and / or equal chance prize gaming without a permit are to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.

9. Provisional Statements

Developers may wish to apply to this authority for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.

S204 of the Act provides for a person to make an application to the licensing authority for a provisional statement in respect of premises that he or she:
- expects to be constructed;
- expects to be altered; or
- expects to acquire a right to occupy.

The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.

In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission (except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.

The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. The licensing authority will be constrained in the matters it can consider when determining the premises licence application, and in terms
of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:

- they concern matters which could not have been addressed at the provisional statement stage, or
- they reflect a change in the applicant’s circumstances.

In addition, the authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional statement stage;
- which in the authority’s opinion reflect a change in the operator’s circumstances; or
- where the premises has not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this licensing authority notes that it can discuss any concerns it has with the applicant before making a decision.

10. Reviews

Requests for a review of a premises licence can be made by interested parties or responsible authorities; however, it is for the licensing authority to decide whether the review is to be carried-out. This will be on the basis of whether the request for the review is relevant to the matters listed below:

- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission;
- reasonably consistent with the licensing objectives; and
- in accordance with the authority’s statement of licensing policy.

The request for the review will also be subject to the consideration by the authority as to whether the request is frivolous, vexatious, or whether it will certainly not cause this authority to wish to alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

The licensing authority can also initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any reason which it thinks is appropriate.

Once a valid application for a review has been received by the licensing authority, representations can be made by responsible authorities and interested parties during a 28 day period. This period begins 7 days after the application was received by the licensing authority, who will publish notice of the application within 7 days of receipt.

The licensing authority must carry out the review as soon as possible after the 28 day period for making representations has passed.

The purpose of the review will be to determine whether the licensing authority should take any action in relation to the licence. If action is justified, the options open to the licensing authority are:-

(a) add, remove or amend a licence condition imposed by the licensing authority;
(b) exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
(c) suspend the premises licence for a period not exceeding three months; and
(d) revoke the premises licence.

In determining what action, if any, should be taken following a review, the licensing authority must have regard to the principles set out in section 153 of the Act, as well as any relevant representations.

In particular, the licensing authority may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.
Once the review has been completed, the licensing authority must, as soon as possible, notify its decision to:

- the licence holder
- the applicant for review (if any)
- the Commission
- any person who made representations
- the chief officer of police or chief constable; and
- Her Majesty’s Commissioners for Revenue and Customs

Guidance also states: “...An application for a permit may be granted only if the licensing authority is satisfied that the premises will be used as an unlicensed Family Entertainment Centre (FEC), and if the Chief Officer of Police has been consulted on the application.... licensing authorities might wish to consider asking applications to demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act; and
- that staff are trained to have a full understanding of the maximum stakes and prizes.

It should be noted that a licensing authority cannot attach conditions to this type of permit.

This licensing authority has adopted the following Statement of Principles, in respect of unlicensed FECs:

The licensing authority will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits; however, they may include appropriate measures/training for staff as regards suspected truant school children on the premises, measures/training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises.

The licensing authority will also expect the applicants to demonstrate a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs, that the applicant has no relevant convictions and that staff are trained to have a full understanding of the maximum stakes and prizes.
The Licensing Authority will require the following to be submitted in addition to the application form and fee:

1. Proof of the applicant’s identity and age;
2. Proof of the applicant’s right to occupy the premises for which the permit is sought;
3. (Where the applicant is an individual) a ‘basic’ disclosure and barring service disclosure dated no earlier than one calendar month on the day the application is received by the licensing authority. Holders of operating licences issued by the Gambling Commission are exempt from this requirement.
4. An insurance certificate (or certified copy) confirming the availability of public liability insurance covering the proposed activity.
5. A plan scale 1:100 of the premises showing:
   a. The boundary of the premises including any internal and external walls, entrances, exits, doorways and windows, and indicating the points of access available to the public.
   b. The location of any fixed or temporary structures.
   c. The location of any counters, booths, offices or other locations from which staff may monitor the activities of persons on the premises.
   d. The location of any public toilets within the boundary of the premises.
   e. The location of CCTV cameras.
   f. The location of any ATM or other cash/change machines.
   g. The proposed location of the Category ‘D’ machines.
   h. Details of non-category ‘D’ machines (e.g. skill with prizes machines).

2. (Alcohol) Licensed premises gaming machine permits - (Schedule 13 paragraph 4(1))

Automatic entitlement: 2 machines

There is provision in the Act for premises licensed to sell alcohol for consumption on the premises to automatically have 2 gaming machines, of categories C and/or D. The person who holds the premises licence (issued under the Licensing Act 2003), merely need to notify the licensing authority and pay the prescribed fee.

The licensing authority can remove the automatic entitlement in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Act (i.e. that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with);
- the premises are mainly used for gaming; or
- an offence under the Act has been committed on the premises.

Permit: 3 or more machines

If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Act, and “such matters as they think relevant.”

This licensing authority considers that “such matters” will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures which will satisfy the authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also be of help. As regards the protection of vulnerable persons, applicants may wish to consider the provision of information leaflets / help-line numbers for organisations such as GamCare.
It is recognised that some alcohol-licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.

It should be noted that the licensing authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

3. Prize Gaming Permits

The Act states that a licensing authority may “prepare a statement of principles that they propose to apply in exercising their functions under this Schedule” which “may, in particular, specify matters that the licensing authority proposes to consider in determining the suitability of the applicant for a permit”.

This licensing authority has prepared a Statement of Principles which is that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:

- that they understand the limits to stakes and prizes that are set out in Regulations;
- that the gaming offered is within the law;
- clear policies that outline the steps to be taken to protect children from harm.

The licensing authority shall also require (where the applicant is an individual) a ‘basic’ disclosure and barring service disclosure dated no earlier than one calendar month on the day the application is received by the licensing authority. Holders of operating licences issued by the Gambling Commission are exempt this requirement.

In making its decision on an application for this permit the licensing authority does not need to (but may) have regard to the licensing objectives but must have regard to any Gambling Commission guidance. (Gambling Act 2005, Schedule 14 paragraph 8(3))

It should be noted that there are conditions in the Act by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:

- the limits on participation fees, as set out in regulations, must be complied with;
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- participation in the gaming must not entitle the player to take part in any other gambling.

4. Club Gaming and Club Machine Permits

Members clubs and miners’ welfare institutes (but not commercial clubs) may apply for a club gaming permit. The club gaming permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in forthcoming regulations.

Members clubs and miners’ welfare institutes – and also commercial clubs – may apply for a club machine permit. A club machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D). NB: Commercial clubs may not site category B3A gaming machines offering lottery games in their club.

This licensing authority notes that the guidance states (S25.446):
The LA has to satisfy itself that the club meets the requirements of the Act to obtain a club gaming permit. In doing so it will take account a number of matters as outlined in sections 25.44 –25.49 of the Gambling Commission’s Guidance. These include the constitution of the club, the frequency of gaming, and ensuring that there are more than 25 members.

The club must be conducted ‘wholly or mainly’ for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made regulations and these cover bridge and whist clubs.

The Commission Guidance also notes that licensing authorities may only refuse an application on the grounds that:
(a) (i) for a club gaming permit: the applicant is not a members’ club or miners’ welfare institute
(ii) for a club machine permit: the applicant is not a members’ club, miners’ welfare institute or commercial club
(b) the premises are used by children or young persons
(c) an offence or a breach of a condition of the permit has been committed by the applicant while providing gaming facilities
(d) a permit held by an applicant has been cancelled during the last ten years
(e) an objection has been made by the Commission or local chief officer of police.

There is also a ‘fast-track’ procedure available under the Act for premises which hold a club premises certificate under the Licensing Act 2003 (Schedule 12, paragraph 10). Commercial clubs cannot hold club premises certificates under the Licensing Act 2003 and so cannot use the fast-track procedure. As the Gambling Commission’s Guidance to Licensing Authorities states: “Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the grounds upon which an authority can refuse a permit are reduced.” and “The grounds on which an application under the process may be refused are that:
(a) the club is established primarily for gaming, other than gaming prescribed under Schedule 12;
(b) in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
(c) a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled.”

There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

5. Temporary Use Notices

Temporary use notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a temporary use notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.

The licensing authority can only grant a temporary use notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.

The Secretary of State has the power to determine what form of gambling can be authorised by temporary use notices, and at the time of writing this Statement the relevant regulations (SI no 3157: The Act (Temporary Use Notices) Regulations 2007) state that temporary use notices can only be used to permit the provision of facilities or equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments.

There are a number of statutory limits as regards temporary use notices. The meaning of “premises” in Part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance to Licensing Authorities. As with “premises”, the definition of “a set of premises” will be a question of fact in the particular circumstances of each notice that is given. In the Act “premises” is defined as including “any place”.
In considering whether a place falls within the definition of “a set of premises”, the licensing authority needs to look at, amongst other things, the ownership/occupation and control of the premises.

This licensing authority expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises, as recommended in the Gambling Commission’s Guidance to Licensing Authorities.

6. Occasional Use Notices

Section 39 of the Act provides that where there is betting on a track on eight days or less in a calendar year, betting may be permitted by an occasional use notice without the need for a full premises licence.

The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. This licensing authority will though consider the definition of a ‘track’ and whether the applicant is permitted to avail him/herself of the notice.

7. Small Society Lotteries

The licensing authority will register and administer smaller non-commercial lotteries and applicants for lottery licences must apply to the licensing authority in the area where their principal office is located.

The licensing authority may refuse an application for registration if in their opinion:
• The applicant is not a non-commercial society;
• A person who will or may be connected with the promotion of the lottery has been convicted of a relevant offence; or
• Information provided in or with the application for registration is false or misleading.

Where the licensing authority intends to refuse registration of a society, it will give the society an opportunity to make representations and will inform the society of the reasons why it is minded to refuse registration and supply evidence on which it has reached that preliminary conclusion. In any event, the licensing authority will make available on its website its procedures on how it handles representations.

The licensing authority may revoke the registered status of a society if it thinks that they would have had to, or would be entitled to; refuse an application for registration if it were being made at that time. However, no revocations will take place unless the society has been given the opportunity to make representations. The licensing authority will inform the society of the reasons why it is minded to revoke the registration and will provide an outline of the evidence on which it has reached that preliminary conclusion.

Part D
Committee, Officer Delegation and Contacts

1. Committee decisions and scheme of delegation

The licensing authority is involved in a wide range of licensing decisions and functions and has established the Licensing and Gambling Act Committee to administer them.

Licensing Sub-Committees made up of three Councillors from the main Licensing and Gambling Act Committee will sit to hear applications where representations have been received from interested parties and responsible authorities. Ward Councillors will not sit on a Sub-Committee involving an application within their ward.

Where a Councillor who is a member of the Licensing and Gambling Act Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision making process affecting the licence in question.
The Council’s Licensing Officers will deal with all other licensing applications where either no representation have been received, or where representations have been received and it is agreed by the parties that a hearing is not necessary.

Decisions as to whether representations are irrelevant, frivolous or vexatious will be made by Council Officers, who will make the decisions on whether representations or applications for licence reviews should be referred to the Licensing and Gambling Act Committee or Sub-Committee. Where representations are rejected, the person making that representation will be given written reasons as to why that is the case. There is no right of appeal against a determination that representations are not admissible.

The table shown at Appendix B sets out the agreed delegation of decisions and functions to Licensing and Gambling Act Committee, Sub-Committee and Officers.

This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

2. Contacts

Further information about the Act, this Statement of Licensing Policy or the application process can be obtained from:-

The Licensing Team
South Norfolk Council
Cygnet House
Long Stratton
Norwich
NR15 2XE

Telephone: 01508 533621
email: licensingteam@s-norfolk.gov.uk
Website: www.south-norfolk.gov.uk

Information is also available from:-

Gambling Commission
4th floor
Victoria Square House
Birmingham
B2 4BP

Tel: 0121 233 1096
Website: www.gamblingcommission.gov.uk
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<td>Fee Setting - when appropriate</td>
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</tr>
<tr>
<td>Application for premises licences</td>
<td></td>
<td>Where representations have been received and not withdrawn</td>
<td>Where no representations received/ representations have been withdrawn</td>
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<tr>
<td>Application for a variation to a licence</td>
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<td>Where representations have been received and not withdrawn</td>
<td>Where no representations received/ representations have been withdrawn</td>
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<tr>
<td>Application for a transfer of a licence</td>
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<td>Where representations have been received from the Commission</td>
<td>Where no representations received from the</td>
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<td>Application for a provisional statement</td>
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<tr>
<td>Review of a premises licence</td>
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<tr>
<td>Application for club gaming / club machine permits</td>
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<td>Where representations have been received and not withdrawn</td>
<td>Where no representations received/ representations have been withdrawn</td>
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<tr>
<td>Cancellation of club gaming/ club machine permits</td>
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<td>Applications for other permits</td>
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<td>Cancellation of licensed premises gaming machine permits</td>
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<tr>
<td>Consideration of temporary use notice</td>
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<td>Decision to give a counter notice to a temporary use notice</td>
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South Norfolk is a rural district covering approximately 90,765 hectares and with a population of over 129,000 (2014 ONS). The area is an attractive rural area of market towns and villages with approximately 57,880 dwellings and 6,000 businesses within the District. The main urban areas are the towns of Wymondham, Diss, Harleston, Loddon, Costessey and Hingham as well as the parish of Cringleford on the Norwich fringe and large villages including Hethersett, Long Stratton, Poringland and Mulbarton. A map is attached as Appendix A.

Gambling activities within South Norfolk, as at August 2015, consist of 9 betting shops, 1 adult gaming centre and a total of 78 premises with a premises licence authorising the sale of alcohol where gaming machines have been provided by way of notification or permit. There are 13 clubs that hold club machine/gaming permits and there are 195 small society lotteries.

Currently it is not felt that there are any significant concerns relating to gambling premises within the South Norfolk district.

The Council appreciates the potential risks from gambling activities in relation to young and vulnerable persons therefore operators and applicants should take the following factors into consideration when submitting applications and compiling premises based risk assessments.

- Temporary accommodation for homeless persons are located in Long Stratton, Costessey and Chedgrave.

- Providers of care for those suffering with mental health issues are located in Diss, Wicklewood and Wymondham.

- Clearly there are a number of schools within the district, the Council would expect licence holders and applicants to take their location into consideration and ensure measures are in place to address advertising of gambling premises that may affect young persons.
Appendix D – List of those consulted

The Chief Officer of Police
Norfolk Fire & Rescue
Child Protection
Trading Standards
Health & Safety
HM Revenue & Customs
Gambling Commission
Environmental Protection
Planning

British Beer & Pub Association
Business Forums – Diss, Harleston, Loddon & Wymondham
Citizens Advice Bureau – Diss, Harleston, Wymondham & Norwich
MP Richard Bacon
Norfolk Association of Local Councils
Norfolk Association of Village Halls
Norfolk Chamber of Commerce
Association of British Bookmakers
BACTA
Gamblers Anonymous
Racecourse Association Ltd
Responsible Gambling Trust
Gamcare
The Bingo Association
Tunmore Leisure Ltd
Essex Leisure
Independent Leisure
Mac Automatics Ltd
DP Leisure
Licensees – Premises benefiting from licences/permits and small society lottery promoters
Members/Parish Councils
NPLaw
Appendix B - List of those consulted

The Chief Officer of Police
Norfolk Fire & Rescue
Child Protection
Trading Standards
Health & Safety
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Environmental Protection
Planning

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Licensees – Premises benefiting from licences/permits and
small society lottery promoters
Members/Parish Councils
NPLaw

South Norfolk Council
Working with you, working for you
Appendix C - Representations

- Wymondham Town Council
- Costessey Town Council
- Coral Racing Ltd
- Gosschalls on behalf of the Association of British Bookmakers
Dear Amanda

Costessey TC has considered both the Gambling & Licensing documents.

Our comments are as follows:

**Licensing Policy:** No objections or alterations needed, but Councillors asked for clarification of the use of SIA trained security staff – eg if our caretakers ask a hirer to turn the music down or if we want a guest list to show the licensee at a party do the caretakers need to be SIA checked / trained?

Please could we also have a list of SNC officers who deal with enforcement issues and a phone no. for noise complaints etc?

**Gambling Act 2005 Statement Policy:** No objections to the statement, but the Norwich South MP, Clive Lewis representing New Costessey Ward, is missing from the list of those consulted on the final page (p35). Surely if Richard Bacon has been consulted then Clive Lewis should be too?

Many thanks

Hilary Elias

Clerk to Costessey Town Council, The Costessey Centre, Longwater Lane, Costessey, Norwich. NR8 5AH. Tel: 01603 742958

The contents of this e-mail are confidential. If you are not the intended recipient, please notify the sender and delete the e-mail.

From: Amanda Cox [mailto:ACox@S-NORFOLK.GOV.UK]
Sent: 01 September 2015 08:53
To: Parish Clerks <ParishClerks@s-norfolk.gov.uk>
Subject: Statement of Licensing Policy, Statement of Gambling Policy & Local Area Profile

Good Morning

The Licensing Act 2003 and Gambling Act 2005 requires each licensing authority throughout England and Wales to review their Statement of Policies every three and five years respectively. South Norfolk’s current policies are due to expire and therefore we are required to carry out reviews of the policies which includes consultation. In addition the Gambling Act 2005 has introduced Local Area Profiles which is included in the Statement of Gambling Policy at appendix C.
The Acts provide who must be consulted during the review process, however we have decided to widen the consultation and include Parish Councils.

The consultation period begins on the 1 September 2015 closing on the 12 October 2015. Copies of the revised policies can be found on our website at:

http://www.south-norfolk.gov.uk/environment/1801.asp

http://www.south-norfolk.gov.uk/democracy/778.asp

At the end of the consultation period, any comments received will be considered and if necessary the policies will be amended. The policies will be taken to Full Council on the 14 December 2015.

Should you have any queries please do not hesitate to contact me.

Kind regards

Amanda Cox
Licensing and Enforcement Officer
t 01508 533621 e acox@s-norfolk.gov.uk www.south-norfolk.gov.uk

South Norfolk

Investors in People | Gold | Facebook | Twitter
Good Morning Amanda

Thank you for the email below.

This has now been discussed by the Councils Planning Lighting & Highways Committee and they have no comments to make.

Many thanks

Trevor Gurney
Town Clerk
Wymondham Town Council

On 01/09/2015 08:53, Amanda Cox wrote:

Good Morning

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Should you have any queries please do not hesitate to contact me.

Kind regards
Wymondham Town Council
14 Middleton Street
Wymondham
Norfolk
NR18 0AD
Tele 01953 603302

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The Licensing Team
South Norfolk Council,
South Norfolk House,
Swan Lane,
Long Stratton,
Norfolk,
NR15 2XE

12th October 2015

Dear Sir,

Consultation on South Norfolk Council’s Statement of Principles – Gambling Act 2005

Coral Racing Limited is most grateful to be given the opportunity to respond to this consultation exercise. Coral was one of the first national bookmakers to be licensed under the Betting and Gaming Act of 1960, and so has been operating the length and breadth of the UK for over 50 years. Its premises comprise locations in the inner city, on the high street, in suburbs and in rural areas, and in areas of both high and low deprivation. It now operates 1850 betting offices across Great Britain, which comprise about 20% of all licensed betting offices. It is, therefore, a highly experienced operator.

Coral Racing Limited are supportive of the document. It again notes that the Board when considering applications are still required to ‘aim to permit gambling’ where this is ‘reasonably consistent with the licensing objectives’, additionally noting that it should not take into account of any moral objections to gambling.

Coral Racing Limited recognise the requirement to supply risk assessments with future applications and variations (requirement is from 6th April 2016) following the consultation completion and are pleased to see the requirements detailed within your statement.

Your statement lists that licensed operators should take into account the location of schools when advertising their premises. This is something which we naturally will comply with however for the purpose of clarity, we would like to highlight that we do not judge that licensed betting shops within the proximity of a school or an educational establishment, causes harm to the licensing objectives. Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral’s general experience, in common with other bookmakers, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges and no evidence whatsoever that they cause problems.

Coral’s experience is that, through all it does, it achieves an exemplary degree of compliance, and attracts negligible evidence of regulatory harm. Through the additional local risk assessment to be introduced with future premises licence applications from April 2016, Coral believe that these should be a) to assess specific risks to the licensing objectives in the local area, and b) to assess whether control measures going beyond standard control measures are needed.
If we can provide any further information, we would be pleased to do so.

Yours faithfully,

\[Signature\]

John Liddle
Director of Development – Coral Retail
Dear Sir/Madam,

Re: Gambling Act 2005 Policy Statement Consultation

We act for the Association of British Bookmakers (ABB) and have received instructions to respond on behalf of our client to the current consultation on the Council’s review of its gambling policy statement.

The ABB represents over 80% of the high street betting market. Its members include large national operators such as William Hill, Ladbrokes, Coral and Paddy Power, as well as almost 100 smaller independent bookmakers.

This response will explain the ABB approach to partnership working with local authorities, it will detail its views on the implementation of the new LCCP requirements, from April 2016, relating to operators’ local area risk assessments and their impact on the licensing regime and will then make specific comment with regard to any statement(s) of concern/that are welcomed in your draft policy.

The ABB is concerned to ensure that any changes are not implemented in such a way as to fundamentally change the premises licence regime through undermining the “aim to permit” principle contained within s153 Gambling Act 2005.

The current regime already adequately offers key protections for communities and already provides a clear process (including putting the public on notice) for representations/objections to premises licence applications. The recent planning law changes effective since April 2015 have also already increased the ability of local authorities to consider applications for new premises, as all new betting shops must now apply for planning permission.

It is important that any consideration of the draft policy and its implementation at a local level is put into context. There has recently been press coverage suggesting that there has been a proliferation of betting offices and a rise in problem gambling rates. This is factually incorrect.
Over recent years betting shop numbers have been relatively stable at around 9,000 nationally, but more recently a trend of overall downwards decline can be seen. The latest Gambling Commission industry statistics show that numbers as at 31 Mar 2015 were 8,958 - a decline of 179 from the previous year, when there were 9,137 recorded as at 31 March 2014.

As far as problem gambling is concerned, successive prevalence surveys and health surveys reveal that problem gambling rates in the UK are stable (0.6%) and possibly falling.

**Working in partnership with local authorities**

The ABB is fully committed to ensuring constructive working relationships exist between betting operators and licensing authorities, and that where problems may arise that they can be dealt with in partnership. The exchange of clear information between councils and betting operators is a key part of this and we welcome the opportunity to respond to this consultation.

There are a number of examples of the ABB working closely and successfully in partnership with local authorities.

**LGA – ABB Betting Partnership Framework**

In January 2015 the ABB signed a partnership agreement with the Local Government Association (LGA). This was developed over a period of months by a specially formed Betting Commission consisting of councillors and betting shop firms and established a framework designed to encourage more joint working between councils and the industry.

Launching the document Cllr Tony Page, LGA Licensing spokesman, said it demonstrated the “...desire on both sides to increase joint-working in order to try and use existing powers to tackle local concerns, whatever they might be.”

The framework built on earlier examples of joint working between councils and the industry, for example the Ealing Southall Betwatch scheme and Medway Responsible Gambling Partnership.

In Ealing, the Southall Betwatch was set up to address concerns about crime and disorder linked to betting shops in the borough. As a result, crime within gambling premises reduced by 50 per cent alongside falls in public order and criminal damage offences.

In December last year, the Medway Responsible Gambling Partnership was launched by Medway Council and the ABB. The first of its kind in Britain, the voluntary agreement allows anyone who is concerned they are developing a problem with their gambling to exclude themselves from all betting shops in the area.

The initiative also saw the industry working together with representatives of Kent Police and with the Medway Community Safety Partnership to develop a Reporting of Crime Protocol that is helpful in informing both the industry, police and other interested parties about levels of crime and the best way to deal with any crime in a way that is proportionate and effective.
Lessons learnt from the initial self-exclusion trial in Medway have been incorporated into a second trial in Glasgow city centre, launched in July this year with the support of Glasgow City Council, which it is hoped will form the basis of a national scheme to be rolled out in time for the LCCP deadline for such a scheme by April 2016.

Jane Chitty, Medway Council’s Portfolio Holder for Planning, Economic Growth & Regulation, said: “The Council has implemented measures that work at a local level but I am pleased to note that the joint work we are doing here in Medway is going to help the development of a national scheme.”

Describing the project, Glasgow’s City Treasurer and Chairman of a cross-party Sounding Board on gambling, Cllr Paul Rooney said: “This project breaks new ground in terms of the industry sharing information, both between operators and, crucially, with their regulator.”

**Primary Authority Partnerships in place between the ABB and local authorities**

All major operators, and the ABB on behalf of independent members, have also established Primary Authority Partnerships with local authorities.

These Partnerships help provide a consistent approach to regulation by local authorities, within the areas covered by the Partnership; such as age-verification or health and safety. We believe this level of consistency is beneficial both for local authorities and for operators.

For instance, Primary Authority Partnerships between Milton Keynes Council and Reading Council and their respective partners, Ladbrokes and Paddy Power, led to the first Primary Authority inspection plans for gambling coming into effect in January 2015.

By creating largely uniform plans, and requiring enforcing officers to inform the relevant Primary Authority before conducting a proactive test-purchase, and provide feedback afterwards, the plans have been able to bring consistency to proactive test-purchasing whilst allowing the Primary Authorities to help the businesses prevent underage gambling on their premises.

**Local area risk assessments**

With effect from 6th April 2016, under new Gambling Commission LCCP provisions, operators are required to complete local area risk assessments identifying any risks posed to the licensing objectives and how these would be mitigated.

Licensees must take into account relevant matters identified in the licensing authority’s statement of licensing policy and local area profile in their risk assessment, and these must be reviewed where there are significant local changes or changes to the premises, or when applying for a variation to or a new premises licence.

The ABB is concerned that overly onerous requirements on operators to review their local risk assessments with unnecessary frequency could be damaging. As set out in the LCCP a review should only be required in response to significant local or premises change. In the ABB’s view this
should be where evidence can be provided to demonstrate that the change could impact the premises’ ability to uphold the three licensing objectives.

Although ABB members will be implementing risk assessment at a local premises level, we do not believe that it is for the licensing authority to prescribe the form of that risk assessment. We believe that to do so would be against better regulation principles. Instead operators should be allowed to gear their risk assessments to their own operational processes informed by Statements of Principles and the local area profile.

The ABB supports the requirement as set out in the LCCP, as this will help sustain a transparent and open dialogue between operators and councils. The ABB is also committed to working pro-actively with local authorities to help drive the development of best practice in this area.

**Local Area Profiles – Need for an evidence based approach**

It is important that any risks identified in the local area profile are supported by substantive evidence. Where risks are unsubstantiated there is a danger that the regulatory burden will be disproportionate. This may be the case where local authorities include perceived rather than evidenced risks in their local area profiles.

This would distort the “aim to permit” principle set out in the Gambling Act 2005 by moving the burden of proof onto operators. Under the Act, it is incumbent on licensing authorities to provide evidence as to any risks to the licensing objectives, and not on the operator to provide evidence as to how they may mitigate any potential risk.

A reversal of this would represent a significant increase in the resource required for operators to be compliant whilst failing to offer a clear route by which improvements in protections against gambling related harm can be made.

We would also request that where a local area profile is produced by the licensing authority that this be made clearly available within the body of the licensing policy statement, where it will be easily accessible by the operator and also available for consultation whenever the policy statement is reviewed.

**Concerns around increases in the regulatory burden on operators**

Any increase in the regulatory burden would severely impact on our members at a time when overall shop numbers are in decline, and operators are continuing to respond to and absorb significant recent regulatory change. This includes the increase to 25% of MGD, changes to staking over £50 on gaming machines, and planning use class changes which require all new betting shops in England to apply for planning permission.

Moving away from an evidence based approach would lead to substantial variation between licensing authorities and increase regulatory compliance costs for our members. This is of particular concern for smaller operators, who do not have the same resources to be able to put
into monitoring differences across all licensing authorities and whose businesses are less able to absorb increases in costs, putting them at risk of closure.

Such variation would in our opinion also weaken the overall standard of regulation at a local level by preventing the easy development of standard or best practice across different local authorities.

**Employming additional licence conditions**

The ABB believes that additional conditions should only be imposed in exceptional circumstances where there are clear reasons for doing so - in light of the fact that there are already mandatory and default conditions attached to any premises licence. The ABB is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statements as to the need for evidence.

This would further increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities.

**Specific Policy Comments**

There is a typographical error within the draft statement of policy on page 7 where there is a reference to “text purchasing”. We believe that this should read “test purchasing”.

The final sentence in the general principles of Part B indicates that “licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.” The policy should be clear at this point and later in the policy where there is a specific section on conditions that additional conditions will only be imposed by the licensing authority where there is evidence of a need to do so. Conditions cannot be imposed where there are mere concerns, perceived needs or where it is simply thought to be appropriate. There must be evidence in the particular circumstances of the case considered by the licensing committee that an additional condition is necessary to ensure that the operation is reasonably consistent with the licensing objectives.

In the following section, under the heading “decision making” the statement of principles indicates that moral or ethical objections and unmet demand are not criteria for a licensing authority. This paragraph should be expanded to recognise that issues of nuisance and the likelihood of the grant of planning permission or building regulation approval cannot be considered by a licensing committee when determining a Gambling Act 2005 application.

On page 12, under the heading “location”, the final two sentences of this paragraph cause the ABB significant concern. Any policy that a specific area is an area where gambling premises should not be located may be unlawful. This paragraph appears to implement a cumulative impact type policy as exists within the licensing regime under Licensing Act 2003. Such a policy is contrary to the overriding principles of “aim to permit” contained with s153 Gambling Act 2005. Similarly, the reversal of the burden of proof in the final sentence that requires the applicant to demonstrate why an application should be granted is contrary to that principle. These two sentences should be
removed and replaced with the reiteration of the principle earlier in the policy that each case will be determined on its own merits.

On page 14, the statement of policy explains the licensing objective of preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. The draft statement of principles indicates that the licensing authority is aware of the distinction between disorder and nuisance. The statement of principles would be assisted by a clear statement that issues of nuisance are not relevant criteria for consideration under Gambling Act 2005 and that the Gambling Commission has defined disorder as activity that is more serious and disruptive than mere nuisance.

As stated above, conditions should only be imposed where there is evidence. The section of the policy that deals with conditions should make it clear that Gambling Act 2005 premises licences are already subject to robust mandatory and default conditions and the starting point for consideration of any application is that it will be granted without additional conditions. It is only in circumstances where there is evidence of a particular need relating to the licensing objectives that the authority should consider additional conditions.

Appendix C deals with the local area profile. The final bullet point refers to schools and indicates that the council would expect licence holders and applicants to take their location into consideration and ensure measures are in place to address advertising of gambling premises that effect young persons. Betting premises are usually situated in densely populated residential areas or areas of high footfall. Either way, betting premises are usually situated in areas where there are children. Operators have developed policies and procedures over the last 50 years of regulation to ensure that those who may not enter the premises (betting offices are adult only environments) do not do so and cannot bet.

The regulation of advertising of gambling premises is heavily regulated and is already covered by the licensing conditions and Codes of Practice. Ordinary Code Provision 5.1.6 requires socially responsible advertising, compliance with CAP and BCAP Codes of Practice and the gambling industry code for socially responsible advertising. The advertising of gambling premises is not therefore an issue for consideration by the licensing authority.

Conclusion

The industry fully supports the development of proportionate and evidenced based regulation, and is committed to minimising the harmful effects of gambling. The ABB is continuing to work closely with the Gambling Commission and the government to further evaluate and build on the measures put in place under the ABB Code for Responsible Gambling, which is mandatory for all our members.

ABB and its members are committed to working closely with both the Gambling Commission and local authorities to continually drive up standards in regulatory compliance in support of the three licensing objectives: to keep crime out of gambling, ensure that gambling is conducted in a fair and open way, and to protect the vulnerable.
Indeed, as set out, we already do this successfully in partnership with local authorities now. This includes through the ABB Code for Responsible Gambling, which is mandatory for all our members, and the Safe Bet Alliance (SBA), which sets voluntary standards across the industry to make shops safer for customers and staff. We would encourage local authorities to engage with us as we continue to develop both these codes of practice which are in direct support of the licensing objectives.

Yours faithfully,

GOSSCHALKS
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<th>Lead Officer</th>
<th>Cabinet Member</th>
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Corporate Plan 2016-2020

Report of the Strategy and Corporate Development Officer
Cabinet Member: Cllr John Fuller

CONTACT
Hannah Ralph
hralph@s-norfolk.gov.uk
1. Introduction

1.1. The Corporate Plan has been submitted to Cabinet for their review and approval.

1.2. The Corporate Plan is an externally facing document and has been designed as an interactive, web based document, encouraging users to view the plan online, rather than print it off, acting as a gateway to additional information and content.

2. Current Position / Findings

2.1. The Corporate Plan was presented to Scrutiny on the 18th November, where a number of suggestions were made. These have been incorporated into the iteration being presented to Cabinet.

2.2. The main aims of the Corporate Plan are to:

2.2.1. Set our overall vision and priorities for the District and the organisation

2.2.2. Present an overview of the key strengths of the District and the context in which we operate

2.2.3. Demonstrate how all our activities link together to achieve our overall ambition

2.2.4. To showcase the innovative work that the Council is undertaking

2.2.5. To demonstrate our focus on delivering better results for South Norfolk- the people and the place

2.3. Each page has been designed with a ‘tab header’ this will allow viewers to easily navigate between the different sections that are of interest to them, rather than having to read the entire document.
2.4. The document will also include a number of ‘hyperlinks’ (a link from a word or image in the document which will take users to relevant web pages) either to our own website or our partners website pages. This has been designed in order to keep the Corporate Plan compact and high level. These hyperlinks will be added over the coming weeks.

2.5. Each priority page will also have a link to a video where the portfolio holder for that particular area will outline the overarching vision and priorities. By including videos in the document, this should serve to increase the Corporate Plan’s web visibility and thus increase the traffic to the website to view it. We are currently working with members to record these videos.

2.6. The Corporate Plan is divided into a number of key sections:

   2.6.1. Introduction from the Leader and Chief Executive
   2.6.2. An overview of our vision and priorities
   2.6.3. An overview of South Norfolk the People and the Place including key information on our road/rail/air/sea connectivity, Greater Norwich, South Norfolk Businesses and our Market towns and villages.
   2.6.4. A high level summary of South Norfolk Council as an organisation and ‘a year in the life snapshot’ of the types of community services we deliver.
   2.6.5. For each priority area there is a link to our successes from the past five years, a high level data profile summary showcasing the strengths of the District and any core challenges, and an overview of the high level priorities under these areas and a few example activities.
   2.6.6. A high level summary of our financial plan. The current iteration contains indicative figures, and may need to be developed before the final version is published after the local government settlement in December.
   2.6.7. A summary of the functions of our committees.
   2.6.8. An overview of our Councillors and a link to their relevant contact webpage
2.7 Dependent of the feedback from Cabinet it is anticipated that it will be recommended to Council on the 14th December and published in early January.

3. Risks and Implications arising

3.1. Financial

3.1.1. The Corporate Plan has been developed in the context of the information that is currently available regarding the local government finance environment we will be operating in over the next five years. Although a solid financial plan has been developed with a prudent approach to potential efficiencies to be made, it should be noted that some activities may need to be revised as a result of any major changes to our budget following the local government settlement announcement in December, and subsequent changes.

3.2. Corporate Priorities

3.2.1. Subject to Cabinet and Council approval the organisation’s corporate priorities will be amended to reflect those in the Corporate Plan.

4. Recommendation

4.1. Cabinet is asked to review the design and content of the Corporate Plan before it is recommended to Council.
By 2017 we will have invested £2.4 million to support our Market Towns.

We have supported Norwich Research Park and a new Food and Health Research Centre to secure £101 million of investment.

We are investing £5 million in our three leisure centres to enhance the health and well-being of our residents.

Since 2014 we have secured £3 million of growing business fund grants to support our businesses to grow.

By 2026 we will have delivered over 16,500 new homes to match local need.

We collect 3,500,000 bins a year ensuring our district stays clean and tidy.

NB: This has been designed as an interactive web document rather than a printed report.
Welcome to South Norfolk

Our business-like and collaborative approach has made our services more efficient enabling us to freeze council tax eight out of the past nine years. Not only this, we have also continued to support investment in our area-

- Since 2014 in collaboration with the Local Enterprise Partnership we have secured over £3 million worth of growing business fund grants to support our local businesses which has attracted a further £19 million of private sector investment.
- Since 2014 we have invested £0.5 million in our local community groups and organisations to support those initiatives that make the difference to the lives of local people.

We are committed to continuing to provide high-quality, customer focussed services by working efficiently and in partnership. Living within our means by working in a business-like way, constantly challenging ourselves, and developing new and innovative approaches. This ensures we can continue to provide those services that lie at the heart of communities and that matter locally to you.

Our Corporate Plan sets out our priorities until 2020 and our key activities over the coming months and years. Some of the highlights include:

- With our partners investing £2.4 million in faster broadband across the District, ensuring that even the most isolated homes and businesses have access sooner.
- Helping over 5,000 families and residents to achieve positive outcomes through our early help ‘Help Hub’ service.
- Utilising innovative funding mechanisms to deliver vital infrastructure for our area and wider region, including bringing to fruition the Long Stratton by-pass.
- Supporting over 9,000 vulnerable people to live independently in their own homes for longer.
- Investing £5 million in our three leisure centres in Wymondham, Diss and Long Stratton to provide state of the art equipment, facilities and experience to help our residents stay fit and healthy.

South Norfolk Council- working with you, working for you.

Leader of the Council

Chief Executive
Our Vision

We are committed to making South Norfolk one of the best places to live and work in the country. Below is our vision for South Norfolk as a place and our ambition for South Norfolk Council as an organisation.

Our Vision

To retain and improve the quality of life and prosperity of South Norfolk, for now and future generations, to make it one of the best places to live and work in the country.

Our Ambition

To be recognised as a respected and ambitious local authority, innovating to help communities thrive by actively shaping services to meet today’s and tomorrow’s need.
Our Priorities

We have three priority areas where we focus our resources and efforts. These areas are underpinned by our customer focussed, collaborative and commercial approach to service delivery.

**Economic Growth, Productivity and Prosperity:**
Providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities.

**Health, Well-being and Early Help:**
Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents.

**Place, Communities and Environment:**
Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages.

**How we will deliver this:**
Moving Forward Together (MFT) is the Council’s continuous improvement programme.
South Norfolk: The people and the place

Greater Norwich

A key engine of growth for the United Kingdom, South Norfolk forms part of Greater Norwich. The area also covers Norwich City Council and Broadland District Council. Greater Norwich is one of the fastest growing parts of the country and is establishing itself as a leader in science, technology and manufacturing, with over 50% of workers in Greater Norwich being employed in knowledge intensive industries.

The Greater Norwich partnership is committed to enable these knowledge based industries to develop and grow. The Greater Norwich City Deal secured in 2013, has brought millions of pounds of extra investment to the area and focuses on turning world class knowledge, research and ideas into world class jobs.

South Norfolk- Our Market Towns, urban fringe and rural growth

The District is diverse, home to both urban and rural locations with an even split of residents living between them. There are 88 towns and villages including four vibrant Market Towns and larger settlements in South Norfolk.

The Market Towns; Loddon, Harleston, Diss and Wymondham provide vital amenities for local residents and visitors and are employment centres for many of our residents. Other large and small settlements play a vital role in supporting the local economy and providing key facilities for our residents including Hingham, Long Stratton, Costessey and Cringleford. We are committed to working with our Town Teams and communities to promote our market towns and villages.

South Norfolk- Our Community

- South Norfolk is home to nearly 130,000 people
- By 2037 the population is predicted to increase by 20% offering opportunities for growth
South Norfolk has excellent connections via road, rail, air and sea. Only a short drive away from Norwich International Airport, the District is also within easy reach of the major east coast ports of Felixstowe, Great Yarmouth, Harwich and Lowestoft. The major train line through the District also means that London is only one and a half hours train journey away. Mainline roads including the recently dualled A11 and A14 to Cambridge, and the A140 to Ipswich mean that the District is well connected to the rest of the Eastern region and beyond- just one hours drive to Cambridge.
South Norfolk: The people and the place

South Norfolk- Our thriving local economy

Greater Norwich is home to 55,782 businesses. We anticipate significant growth over the next five years. We boast a strong and diverse business base which is home to leading innovation centres and enterprises. Our key local business sectors are: Advanced Manufacturing; Engineering; Agri-tech; Energy; ICT; Digital Creative and Life Sciences.

Our five largest employers employ 25% of the South Norfolk workforce. To complement our large employers is a strong base of smaller businesses with 90% employing less than 10 employees.

South Norfolk Business Profile

Hethel Engineering Centre and The A11 Technology Corridor

Hethel Engineering Centre (HEC), close to the Group Lotus factory in the A11 corridor, is the regional hub for innovation and technology and is expanding to meet the demand for incubation space, fostering links between business and prominent research institutions and developing expertise in areas including composites, food and automotive technology.

The completion in 2014 of the £120 million infrastructure investment to dual the A11 has served to greatly enhance the economic growth potential of this Norfolk/Cambridgeshire corridor. Our initiative with partners to develop the A11 technology corridor capitalises on the areas bio-tech, info-tech, agri-tech, clean-tech sector strengths along with its strong logistics sector and the world-class academic and research capabilities of the University of Cambridge and the Norwich Research Park.

South Norfolk Business Profile

Norwich Research Park

Norwich Research Park is a world class centre for life sciences. It is home to three of the UK’s eight Biotechnology and Biological Sciences Research Council Institutes and a cluster of six world class institutions.

It has a global reputation for research in Agri-Food, Health and Environmental Sciences. Norwich Research Park is also a major employer – 11,000 jobs across research and commercial activities, 2,700 scientists and 14,000 students.
South Norfolk Council: Who we are and what we do

Who we are:

46 Councillors

463 full time equivalent employees

One organisation, 83 services:
A year in the life of South Norfolk Council

9000 Revenues and Benefits Customers

74,000 calls to our Customer Service Centre

3,500,000 bin collections

500,000 visits to our three leisure centres

140 Disabled Facilities Grants

150 projects awarded Community Grants Funding

500 people housed through the housing register

2,400 planning applications processed

900 Food premises visited
Economic Growth, Productivity and Prosperity

South Norfolk Profile Summary

- Home to over 5000 Businesses
- 510 new business start ups a year
- 57,000 people work in South Norfolk
- 74% of residents are home owners
- Average earnings are £26,226 - higher than the Norfolk average
- 90% of businesses employ up to 10 employees
- More students choose further education compared to the rest of Norfolk
- 80% of residents are economically active
- 22% business rates growth over the past 4 years.

Our Challenges

- An additional 13,000 jobs to be created in Greater Norwich by 2020
- Limited Superfast Broadband access and mobile coverage
- Unemployment is highest amongst 16-19 year olds
- Ensuring local skills match local business need

Click here to see what we have achieved over the past five years
Click here to hear from Cllr John Fuller the Leader of the Council
Our priorities and key activities

Working as part of Greater Norwich to support investment in critical infrastructure, utilising innovative funding mechanisms, increasing the number of local jobs and the area’s overall productivity.

- Ensure residents across the district can stay connected by supporting access to Superfast Broadband services and improving Broadband fibre optic coverage, through a £2.4 million investment.
- Provide local businesses the opportunity to grow and showcase their expertise by working with partners to develop a commercial zone for our regions food, drink and agricultural sector; the Greater Norwich Food Enterprise Zone.
- Unlock growth potential and bring forward infrastructure to support existing and future communities by working as part of the Greater Norwich Growth Board.
- Deliver a high-quality local road network for our residents, through investing over £10 million to support the development of the Long Stratton bypass.

Supporting new and existing businesses to grow; facilitating innovation, and providing targeted support to key sectors.

- Increase the number of businesses and jobs by working in partnership to develop a specialist technology growth corridor that optimises the economic opportunity from the dualling of the A11 infrastructure investment.
- Provide the right environment for new and existing businesses to grow through funding, sector-specific networking, business support and enhancing the national and international profile of our region.
- Attract new inward investment to create high value jobs, through capitalising on our world-leading research and development base.
- Commit resources to support key innovation initiatives, enterprise zones and the new Catapult Centre for Food and Health on the Norwich Research Park.
- Optimise the economic opportunity of Hethel Engineering Centre to deliver a Technology Park on this site.

Working with key partners to develop local skills to match what our businesses need, and supporting apprenticeships.

- Increase the number of apprenticeships by providing a number of posts as an authority and work with local businesses supporting them to provide training opportunities and apprenticeships across the locality.
- Support our local people to develop the skills that our businesses need by acting as a key link between local businesses, schools, colleges and universities.

Sustaining the character and supporting the vitality of our local market towns, stimulating business growth, both in town centres and across the rural parts of our District.

- Enhance the vitality of our market towns and promote them as visitor destinations, by supporting and encouraging events to enhance economic and social development through our £2.4 million investment.
- Increase the number of visitors to our market towns by developing the use of new technology to support businesses and enhance our high street offer.
What success will look like over the next five years:

- The Greater Norwich Food Enterprise Zone supported to deliver eight new businesses and approximately 100 new jobs.
- The delivery of the Long Stratton By-pass.
- Over 150 hectares of employment land developed by 2026.
- 3,400 new jobs created in the district.
- Increase the number of new businesses attracted to operate and grow in South Norfolk by 1%.
- The creation of 75 new business start-ups.
- 20 hectares of land developed at Norwich Research Park supporting new jobs and growth.
- 20 hectares of land developed at Hethel Engineering Centre to deliver the new Technology Park.
- Over 350 apprenticeship placements available in our local businesses for our young people.
- Increase the number of day visits to South Norfolk by 5.3% and increase tourism spend by 4.3%.
- Outperform the national average by 5% for the footfall in our market towns.
Health, Well-being and Early Help

Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents.

South Norfolk Profile Summary

- Residents in South Norfolk are more healthy than the national average.
- Fuel poverty is below the national average.
- Below average deprivation levels compared to other parts of England.

Our Challenges

- 2% of our residents will be diagnosed with Dementia by 2021.
- By 2021 the number of people aged 80+ will increase by 17%; 7% of the total population.
- 1/4 adults are obese.
- 1/5 children are overweight.
Our priorities and key activities

Encouraging our residents to live healthy and active lives.
- Support our local residents to stay fit and healthy by providing state of the art leisure equipment, facilities and experience for our new and existing members through a £5 million investment in our leisure centres.
- Reduce the prevalence of childhood obesity in our district by working with our partners.
- Support exercise at an early age through delivering our Swim School and Holiday Kids Camp activities.

Supporting our older and vulnerable people in our communities who need our help the most.
- Providing residents and working families a life raft when times are tough to springboard to better things, by working effectively with our Job Centre+ partners to deliver an effective local council tax support and housing benefits scheme that leads to opportunity, not dependency.
- Provide a choice based lettings system that helps local people to find local homes that meet their housing needs.
- Ensure our housing services provide early help to tackle and prevent homelessness.

Working as part of communities to proactively provide early help.
- Provide holistic support to residents and their families at the earliest opportunity through our joined-up ‘Help Hub’ and multi-agency partners.
- Match local people to the support we and our partners provide through developing our Community Connector roles.

Helping our older and vulnerable residents to stay independent and in their own homes for longer.
- Reduce the demand on the health service and the number of those moving into residential care, support older and vulnerable residents to stay independent in their own homes for longer, through providing adaptations, grants, advice and support by our independent living services.
- Support people who are living with Dementia and their carers to live independently in their own home by providing housing adaptations that improve their health and wellbeing, alongside access to dementia-friendly communities and advice.

What success will look like over the next five years:
- 40% increase in our leisure centre members following the refurbishment of our three centres.
- 16% increase the number of adults regularly participating in exercise to lead healthier and active lives.
- 10% increase in the number of children attending swim school.
- 15% increase in the number of children attending Kids Camp.
- 10% increase in the number of residents supported back into work every year.
- Helping over 5,000 families and residents to achieve positive outcomes through our Early Help Hub service.
- Supporting over 9,000 vulnerable people to live independently in their own homes.
Welcome People & Place About Us

Our Vision
Our Priorities
Priority 1
Priority 2
Priority 3
How we will deliver this
Finance
Our Members

Click here to see what we have achieved over the past five years
Click here to hear from Cllr Martin Wilby the Deputy Leader of the Council

Place, Communities and Environment

Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages.

South Norfolk Profile Summary

2,400 planning permissions processed each year

The average house price is £209,000

The average house price is £209,000

25,000 tonnes of refuse collected each year

Low levels of crimes compared to the national average

71% of residents Voted in the May parliamentary elections- higher than the national average

12,000 tonnes of refuse recycled

Over 16,500 new homes to be developed by 2026

1,500 affordable homes to be delivered by 2026
Our priorities and key activities

**Keeping streets and public spaces safe, clean and tidy.**

- Create a clean and bright environment across the district by providing a focussed quality and efficient street cleaning services to remove fly-tipping and support street cleanliness.
- Promote a safe community with reduced crime and anti-social behaviour levels by working closely with our partners and using restorative justice approaches.
- Support access to high quality open spaces for local people and visitors for example, by facilitating with the development of Costessey Country Park.

**Encouraging communities and businesses to recycle more - reducing the amount of waste that we send to landfill.**

- Increase the quantity of waste recycled and reduce the amount of waste sent to landfill by delivering efficient and high quality recycling, refuse and garden waste collection service.
- Support businesses to recycle more by providing a value for money and effective commercial waste service.
- Enable the reuse of unwanted items by hosting regular local community reuse and recycle events.

**Enhancing our high quality environment by supporting development that respects and enhances the distinctive character of South Norfolk.**

- Balance the need for growth to sustain our economy while protecting the special character of our market towns and villages through delivering our Local Plan.
- Support high quality development from one-house builds through to multi-plot commercial sites by providing a seamless Planning and Building control service from pre-planning to application, to completion and Building Control approval.

**Working effectively with the voluntary sector and community groups to make sure our residents have access to a wide range of services and support to meet their needs.**

- Support local initiatives by delivering our Community Action Fund and Member Ward Grants, supporting our elected Members in their role as community leaders.
- Recognise, reward and promote those individuals and organisations that support our communities through delivering our Community Awards and Pub of the Year Awards.
- Ensure our wide range of services are accessible to all residents by promoting them through our annual South Norfolk on Show events.
- Support local and voluntary organisations from across the District by giving staff from across the Council the opportunity to get involved in our staff volunteering initiative.

[Click here for case study](#)
**Ensuring the range and number of local homes match the need of local families and residents.**

- Deliver affordable housing that meets local need through our Affordable Housing Grants Scheme, our planning policy and our work with developers.
- Maximise housing options for South Norfolk residents by identifying empty homes in the District and bringing them back into use.
- Support the development of 'self-builds' by working with our Housing Association Partner, Saffron, to enable local people with the right skills to develop a home that meets their specific needs.

**Supporting a transparent and democratic Council, that enables communities to have their say on local decisions and services**

- Deliver open, fair and democratic elections including the EU Referendum, Neighbourhood Development Plan Referendum, County Council, District and Parish Elections.
- Support Elected Members to decide Council priorities and strategies supporting them as strong community leaders.

**What success will look like over the next five years:**

- 16,500 new homes developed by 2026.
- 1,500 new affordable homes developed.
- Over 60 self-build homes developed.
- 14.5% increase of the household materials recycled, composted or reused.
- Serving three out of five local small to medium enterprises through our commercial waste service.

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**Diss Express**

Government figures show South Norfolk Council is leading the way on affordable homes
Welcome People

& Place About Us

Our Vision

Our Priorities

Priority 1 Priority 2 Priority 3 How we will deliver this

Finance

Our Members

Increasing our ability to be self-financing through commercialisation, where appropriate, to support those services that matter to residents the most.

- Continue to support frontline services through maximising commercial opportunities and generating resources by developing our Build Insight Building Control company beyond the boundaries of South Norfolk.
- Drive business and housing growth across the district by developing sites through our Big Sky Development company and property portfolio.

Delivering increased value for money by increasing productivity.

- Redirect resources to the services that matter the most to our residents by driving out efficiencies, working in a business-like way and supporting continuous improvement on a day to day basis.
- Improve customer satisfaction and service efficiency through harnessing the potential of technology.

Delivering the services that customers need, when they need them.

- Putting customers in control, enabling them to access services at a time that is convenient to them by providing a user-friendly, intuitive website, which enables our customers to self-serve.
- Meet our customers’ needs by providing an efficient and effective Customer Contact Centre.
- Ensure our services are accessible and promoted to all our residents and businesses by utilising the potential of social media to interact with our community.

Leading and building collaborative working with our private, public and voluntary sector partners to deliver better and more efficient services for our residents.

- Deliver better outcomes for local communities through devolution by working with partners on a scale that ensures regionally we deliver more joined-up local strategies and services.
- Promote and protect the interests of our local residents and businesses by shaping and influencing national policy, both independently and through our work with national partners including the Local Government Association and District Councils’ Network.

What success will look like over the next five years:

- £29.1 million commercial revenue generated.
- 102 residential dwellings and 3,170m² commercial land developed through our Big Sky Developments company.
- Over 70% of customers using our website to find and use the services they need.
- Between £3.2 million and £6 million of efficiency savings delivered.
Our Financial Plan

We are proud that we have been able to freeze council tax eight out of the past nine years, with no impact to service delivery. Like all local authorities, South Norfolk is operating in a changing financial environment. Rather than reduce services that matter most to our residents, we are committed to developing and generating new income streams and using innovative and devolved funding mechanisms to continue to support our services.

Our Income

The local government financial landscape is evolving. By 2020, Local Authorities will no longer receive the Revenue Support Grant. It is also likely that the amount of New Homes Bonus that we receive will change with recent announcements in the Comprehensive Spending Review outlining that New Homes Bonus will be paid over four years rather than six. Through the localisation of business rates we expect to see business rates increase as a proportion of our income over the period of the plan. This will reflect the growth in the economy within the area, as this element of the Council’s income is directly linked to the prosperity and growth of the District.

Central to our long-term financial plan to become more financially self-sustaining is seeking to generate new income streams by using our capital to support the economy to grow. Our work to commercialise our services is aimed at delivering £4.9 million in additional income over the next five years through commercial revenue, property rental and increased sales. This will help ensure that we can support those services that residents value the most.

Not only this, we will continue to work in our business-like manner to drive out between £3.2 million and £6 million of additional efficiency savings we need to make by 2020/21. The diagram on the next page shows where our medium term financial strategy anticipates our income will come from over this period.
Our income changes over the next five years

A guide to where our funding comes from:

**Council Tax**
Residents in South Norfolk pay less council tax than the national average. Council Tax is a fee paid by households to Local Authorities based on the size of the property and the people that live there.

**Other Fees and Grants**
This includes income from areas such as taxi licences, land charges, building control charges, internal audit consortium income and car park charges.

**Business Rates**
Business Rates (also known as National Non-Domestic Rates) are a tax on business properties. We anticipate that by 2020 we will have the localisation of business rates which means we will have more local control regarding rates and what the money is spent on.

**Revenue Support Grant**
The revenue support grant is a central government grant given to local authorities which can be used to finance revenue expenditure on any service.

**Benefits and Subsidy**
We receive a subsidy from central government that covers the cost of making housing benefit payments. We also receive funding from central government to pay benefits to those local residents in most need.

**Planning Fees**
These fees are set by Government for every planning application that is submitted. We also offer an optional pre-application service.

**Build Insight**
Our Local Authority owned Approved Inspector Company delivering Building Control services outside the district.

**Leisure Centre Income**
This is the revenue we receive from our leisure centres to invest back in services and facilities that improve the health and well-being of our residents.

**Garden and Commercial Waste**
We provide an optional affordable Commercial and Garden Waste Service for our local businesses and residents.

**Big Sky Developments and Commercial Property**
Big Sky Developments Company builds and rents commercial and residential property across the district supporting business growth and housing growth.

**New Homes Bonus**
The New Homes Bonus is a grant paid by central government to local councils for increasing the number of homes and their use.

**Build Insight**
Our Local Authority owned Approved Inspector Company delivering Building Control services outside the district.

**Budget Gap**
This is the amount of efficiency savings we need to make.

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**Note:**
- New Homes Bonus- It is likely that following the national consultation regarding New Homes Bonus that the amount we receive will change.
- Benefits and Subsidy- This amount may change depending on the roll out of the Universal Credit Scheme.
- Business Rates - The overall income from business rates may vary dependent on the roll out of the localisation of business rates.
Our Expenditure

The below outlines our predicted spend over the next five years relative to our three priority areas:

Total budget spend 2016/2017 £53 million including £26.5 million of benefit payments.

A detailed break down of how much our services cost to run can be found in our business plan.
Our Committees

**Council**

Council is formed by all elected Members in the District. There are certain decisions which are “reserved” to Council to make. These include agreeing the Constitution of the Council, setting the policy framework and establishing the budget each year (including the Council Tax level).

**Cabinet**

Cabinet makes the majority of decisions within the Council. It proposes those reports Council has to approve, and is responsible for implementing the plans and strategies that Council approves.

**Scrutiny Committee**

Scrutiny Committee can review, or scrutinise, decisions made by the Cabinet and make recommendations based on their review. They can also hold certain outside bodies to account, and review areas of activity they are interested in or concerned about.

**Licensing and Standard Committees**

The Licensing and Gambling Acts Committee meets to determine applications for licenses under the licensing act 2003 or the gambling act 2005, and help the Council develop the statement of licensing policy. The Licensing Appeals and Complaints Committee meets to review all other licensing and gambling issues, including breaches of licence conditions, reviewing and advising on fees and charges, and hear appeals on licensing and housing decisions.

**Policy Committees**

Policy Committees review areas of policy development in more depth, endorsing policies and strategies for Cabinet to approve and review areas of Council performance which are of concern to Cabinet, identifying any gaps in the policy or strategy framework for the service and making recommendations to Cabinet on that basis.

**Development Management Committee**

The Committee mainly considers whether planning applications should be allowed, particularly where there are concerns or objections to planning applications, or there is a substantial or high profile development in the District. The Committee has to take into account local and national rules on planning when making its decisions. These reflect where development can occur, what developments may look like, and what considerations have to be taken into account when making decisions.
Each Councillor represents the residents living within a ward in our District. Our Councillors are committed to making South Norfolk one of the best places to live and work in the Country delivering the services that our residents value the most.

You can click on the pictures of our members which will take you through to their contact page.
Our Management Team

Sandra Dinneen  
Chief Executive

Tim Horspole  
Director of Growth and Localism

Debbie Lorimer  
Director of Business Development

Paula Boyce  
Director of Community Services

· Business Improvement  
· Elections  
· IT  
· CNC Building Control  
· Engagement and Marketing

· Economic Development  
· Customer Services  
· Food Safety  
· Conservation and Design  
· Development Management  
· Enforcement  
· Planning Policy  
· Revenues and Benefits

· Human Resources and Organisational Development  
· Leisure  
· Finance  
· Accountancy  
· Property  
· Audit

· Waste and Recycling  
· Environmental Protection  
· Housing and Public Health  
· Democratic Services  
· Communities

Find out more about our services...
South Norfolk Council Response to Norfolk County Council’s
Re-imagining Norfolk Consultation

Report of the Director of Business Development
Cabinet Member: John Fuller

CONTACT
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dlorimer@s-norfolk.gov.uk
1. Introduction

1.1. Norfolk County Council has identified that it needs to save a further £111m to balance its budget for the next three years. It is consulting on Council Tax and 19 specific areas to save money in 2016/17 as well as the County Council’s approach to making savings in 2017/18 and 2018/19 through their Re-imagining Norfolk Strategy. Responses are requested by 14 January 2016. The full consultation document is available on the County Council’s website at www.norfolk.gov.uk/reimagining

1.2. This report summarises the main proposals in the consultation and recommends how South Norfolk Council should respond.

2. Background

2.1. Norfolk County Council has stated that “We want a well-educated Norfolk where young people are prepared for real jobs that pay well and work with our partners, in both the public and private sectors, to shape a county that welcomes business and supports a quality of life that makes Norfolk a great place to live as well as work” In order to achieve this the County Council’s priorities are:

2.1.1.1. Real jobs - We want real, sustainable jobs available throughout Norfolk. Pay is relatively low in Norfolk, and behind beautiful images of coastlines, windmills and beaches there are too many households relying on seasonal work and low incomes. We will promote employment that offers security, opportunities and a good level of pay.

2.1.1.2. Good infrastructure - Norfolk is open for business but not everyone has got the message. We need to continue our campaign for a fair share of infrastructure investment in road, rail and superfast broadband.
2.1.1.3. **Excellence in education** - Not enough of our schools give students a good education. Too many young people leave school without a set of good qualifications, and without the skills that employers are looking for. We will champion our children and young people’s right to an excellent education, training and preparation for employment because we believe they have the talents and ability to compete with the best.

2.1.1.4. **Supporting vulnerable people** - As our funding diminishes; we need to get even better at targeting those who most need our help and support.

2.2. All of the four priorities above would assist in delivering South Norfolk Council’s own draft priorities (listed below- subject to Cabinet approval on the 7th December), in particular providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities, and supporting those residents who need our help the most.

**South Norfolk Council’s priorities:**

- **Economic Growth, Productivity and Prosperity:**
  Providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities.

- **Health, Well-being and Early Help**
  Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents

- **Place, Communities and Environment**
  Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages.

3. **The County Council’s financial approach and strategy**
3.1. The County Council’s strategy is to change the way they work and to look for better ways of doing things. They are focusing on cutting their own costs, changing processes, getting “better deals” and generating income. Examples of this approach include:

- Changing how support to families is provided so that the County Council help them early on
- Using new technology, for example mobile devices for highway inspectors
- Encouraging more people to use the County Council website as their first point of contact
- Reducing the running costs of the County Council’s buildings
- Using fewer agency staff
- Looking for better deals from our suppliers for the things that we buy, without affecting our services, and negotiating better contracts
- Looking at ways of selling products and services to external customers and generating more income
- Reducing staff costs across all departments and saving money on paper transactions and processes by doing more online.

3.2. This strategy is similar in part to South Norfolk Council’s own strategy, which focuses on generating income to reduce our dependence on central funding, greater efficiency and cost savings through leaner work practices, investment in technology to assist customers in improved access to services and building on the existing collaborations to jointly deliver services where appropriate.

While South Norfolk Council understands the need to make savings and the difficult decisions the County Council face. Nonetheless, as an authority we would want to ensure that the adverse impact on the services that residents receive is minimise, and that any savings made by the council result in overall savings to the public purse, rather than moving need around the system. South Norfolk Council would like to build on the achievements of our extensive collaboration to date, not only to stimulate growth and support those most vulnerable within our District, but also working in the most efficient way possible.
4. South Norfolk Council’s Response

4.1. The Council’s formal response to the consultation is contained in the letter in Appendix A which includes responses to the specific areas raised.

5. Risks and Implications arising

5.1. Financial – There are potential financial risks to South Norfolk Council where the County Council proposals could increase demand for our services at a time when South Norfolk Council is too looking to reduce its spending. However, this will be balanced with the opportunity to work more closely together to deliver savings through improved service delivery which will have a positive impact on our residents and businesses.

5.2. Equalities – The County Council has put in place a comprehensive assessment process to help make an informed decision. The County Council produce a final impact assessment to assess the activities proposed:

- A high-level assessment of all the proposals, to identity whether they will particularly impact on people with protected characteristics in Norfolk, such as disabled or older people, or people in rural areas, and if so, what the implications are; and
- A more detailed assessment of the impact of each individual proposal, which looks at a wide range of evidence and takes into account the views of residents and service users, as well as community, voluntary organisations and stakeholders.

This will be considered by County Councillors at the relevant service committees in January and Full Council on 22 February 2015 before they make a final decision.
6. Conclusion

6.1. South Norfolk Council recognises that the County Council needs to make savings and some tough decisions over the coming few years. We want to continue to work collaboratively with the County Council to ensure we deliver the services our local residents and businesses need, in the most efficient way possible, driving growth, productivity and prosperity both for the District and Norfolk as a whole.

7. Recommendation

7.1. Cabinet to review and approve the formal response to the County Council Budget Consultation contained in Appendix A.
Dear Cllr. Nobbs

Re-imagining Norfolk- Budget Consultation 2016-19

Thank you for providing the opportunity for South Norfolk Council to comment on your budget proposals for 2016-19. As a local authority we appreciate the difficult decisions the County Council faces, with a need to continue to deliver quality services while balancing demand in an evolving local government financial environment. We would welcome further opportunities to discuss these proposals with your members and officers to explore how we can work together for the benefit of our residents.

There are many examples of how we have successfully collaborated to provide support to those residents that need our help the most, drive growth and productivity, and working in the most efficient way. From Early Help, the Greater Norwich City Deal and Greater Norwich Growth Board, to Nplaw and our joint telephony system. We are keen to continue to build on this solid base of collaboration, and are excited by the potential that increased benefits collaboration and devolution could bring for our residents and businesses.

The County Council’s four priorities regarding real jobs, good infrastructure, excellence in education and supporting vulnerable people will assist in delivering South Norfolk Council’s own priorities (listed below), in particular providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities, and supporting those residents who need our help the most.

South Norfolk Council’s Priorities:

- **Economic Growth, Productivity and Prosperity:** Providing the conditions to stimulate growth, productivity and prosperity, sharing the benefits of growth with our communities.
- **Health, Well-being and Early Help**
Proactively working with communities to provide help at the earliest opportunity and enhancing the health and well-being of our residents

- **Place, Communities and Environment**
  Improving the quality of life of our communities and enhancing the built and natural environment in our towns and villages.

Enclosed with this letter are our responses to the specific proposals within your consultation document.

We want to continue to work collaboratively with the County Council to ensure we deliver the services our local residents and businesses need, in the most efficient way possible, driving growth, productivity and prosperity both for the District and Norfolk as a whole. It is important that any savings made by the County Council are not at a detriment to the services or outcomes of our residents, or simply more the level of need around the local government system, with no overall saving to the public purse.

Listed below are those areas where we feel we could continue to collaborate and work more effectively together:

- Keeping residents in independent and in their own home for longer – utilising District Council services such as our handyman service and leisure centres to support and improve the lives of our residents with the benefit of reducing costs by keeping residents out of hospital and care homes. We are concerned by the County Council’s proposal to reduce funding given to District Councils for home improvement agencies, which is likely to escalate the level of need of our vulnerable and older residents more quickly, impacting on their quality of life and increasing long-term costs.

- Early Help- Our Early Help initiative has gone from strength to strength over the past year and is really making a difference to the lives of our residents in the District, providing support sooner and in a more joined-up way. We look forward to continuing to build on this initiative as we grow its reach across the District.

- Delivering Growth- We are committed to making our District and region more prosperous and productive. We look forward to continuing to deliver growth through the Greater Norwich Growth Board, realising the benefits of the Greater Norwich City Deal and working together to build the case for more devolved powers.

- The rationalisation of Property through the One Public Estate – we would like to work with Norfolk County Council and other public bodies to rationalise the public estate on a locality basis, freeing up and disposing of
public buildings where possible. This will realise on-going revenue savings and return capital funds for future investment.

- Volunteers – there are several areas within the consultation where the use of volunteers is proposed. As an organisation, we too are looking to build out community capacity with our volunteers. We would like to work with the County Council developing the volunteering role within the district, working with our towns and parish councils.

We would welcome your thoughts on working together on the suggestions above and any other areas you would like us to consider. We look forward to continuing to work together and to hearing the outcome of your budget consultation.

Yours sincerely

Cllr. John Fuller
Leader of South Norfolk Council
South Norfolk Council’s response to the Specific proposals within Norfolk County Council’s Budget Consultation

<table>
<thead>
<tr>
<th>Area</th>
<th>Norfolk County Council’s Proposals</th>
<th>3 year Total Savings £m</th>
<th>South Norfolk Council Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approach to making savings</td>
<td>Re-imagining Norfolk is our approach to meeting our priorities while cutting costs. Do you think that this is the right approach?</td>
<td>100.2</td>
<td>We would support the County Council in focusing on “running services more efficiently and getting things right first time” to run better services with less money. We would like to endorse the sentiment around working more closely as a District &amp; County Council to avoid duplication and overlap of services. We can already see the benefits of this style of collaboration within the shared early help hub and our work through the Greater Norwich Growth Board. We also believe the Council’s decision not to “retreat” to deliver only those statutory services it is responsible for is a sensible one. Many of the non-statutory services which both Councils deliver bring benefits which prevent residents seeking more costly intervention in the longer term, enhancing their long-term outcomes.</td>
</tr>
<tr>
<td>Council Tax increase</td>
<td>Should Norfolk County Council raise its share of the council tax by up to 1.99% in 2016-17 in order to protect essential services and reduce the level of cuts?</td>
<td>15.1 (Net of potential Council Tax freeze)</td>
<td>South Norfolk Council would urge the County Council to explore other proposals around improving the ways of working and better value for money, alongside income generation before looking to increase Council Tax, as any increases would have an adverse impact on residents.</td>
</tr>
</tbody>
</table>
Adult Social Care - Reduce the Council’s funding for Supporting People services

- Remove funding for supported living and visiting support for people with learning disabilities and mental health needs. We think people should be able to get the housing support they need through their personal budgets.
- Change the focus of services for older people so they provide less general advice and more specialist support to prevent people needing social care or health related services
- Reduce adult social care funded housing support for young people aged 16-24
- Reduce our support for people who are homeless or people at risk of losing their accommodation
- Reduce funding that we give district councils for home improvement agencies and instead focus on supporting existing handyperson services to become self-sustaining.

South Norfolk Council are concerned that the proposed efficiencies could simply escalate need and push residents to access other public services. We would be concerned with the following:

- There may be increased homelessness through less support - this is likely to worsen outcomes for our residents and impact on the demand of our housing service.
- The reduction in funding for district councils for home improvement agencies will lead to more older people entering residential care and more admissions to hospitals through trips and falls. The Home Improvement Agency offer a holistic early help response supporting residents through the DFG process as well as other interventions designed to keep residents living independently in their own home, supporting those people who would otherwise not have capacity to apply. Whilst, most importantly, this will have significant impact of the quality of life of our residents, it will also have a significant impact in terms of long-term budget savings. For example, every £1 spent adapting 100,000
homes where a serious fall is likely to otherwise occur could save the NHS £69.37 over 10 years. In addition to this, the hospital cost of a hip fracture is more than £16,000 in the first two years– many times more expensive than the cost of fitting major or minor housing adaptation. We are keen to work with the County Council to ensure that funding for DFGs is transported effectively back to Districts who deliver this service.

South Norfolk Council would like to work with the County Council to see how those vulnerable and older people in our District can be supported through our shared early help approach, to ensure we can support them as soon as possible and achieve targeted long term solutions.

| Adult Social Care - Stop all transport funded by adult social services by 2019 | We would signpost people to information and advice about transport options so that they can arrange their own transport. Where a person is not able to do this for themselves we would help them with making the arrangements.  
We would encourage people to use their Motability vehicle or mobility allowance for their transport. | 4.78 | We would be concerned if the withdrawal of funding for transport meant those who need to attend day care can no longer afford to. This could have longer term implications for their wellbeing and result in more costly interventions. |
- We would support people to use public transport or community transport where we assess that they are able to do this. We would provide travel training if appropriate.
- We would support and encourage people to use the service that is closest to them if this will meet their needs, for example, their local day centre.

### Adult Social Care – spend less on traditional day care by helping people join in with community activities

The council’s day care services are now run by a social enterprise called Independence Matters. In addition we work with a number of voluntary and private organisations who provide day care.

We would like to work with these organisations to help more people who have a disability or mental health needs into employment.

From 2017 onwards no estimates provided

We are supportive of encouraging those with a disability of mental health need to enter employment and have the opportunity to utilise a range of services within their community—however we are concerned that this is not suitable for all and therefore other arrangements need to be available for these people which are accessible.

### Adult Social Care – Become the county council with the lowest number of Reduce the number of people in residential care by:
- Making sure only people whose needs cannot be met by any other community based solution go forward for permanent residential care
- Making more use of the Shared Lives scheme

2.4 to 4.8

We would advocate supporting residents remain independent in their own home for longer, and we are currently collaborating with the County to achieve as part of the early help agenda. It is important that the funding for Disabled Facilities Grants is not reduced and is transported back to District Councils who deliver this service.
<table>
<thead>
<tr>
<th>Residential Care</th>
<th>Residential care involves people getting care and accommodation from families in the local community.</th>
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<tbody>
<tr>
<td></td>
<td>• Helping more people with learning disabilities to live in supported housing</td>
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<tr>
<td></td>
<td>• Making more use of equipment and assistive technology that can help people live independently</td>
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<tr>
<td></td>
<td>• Providing more housing with care</td>
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<td></td>
<td>• Providing people paying for their own care with good information about alternative options to</td>
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<td></td>
<td>residential care so more people making their own care choices opt for services that support</td>
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<td></td>
<td>independence.</td>
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<tr>
<td>Beyond the outcomes for residents, which are paramount, we also need to work together to ensure that the savings generated from this approach get reinvested back into the public sector system. As an example, typically, £5000 invested in delaying an individual going into the residential care by 5 years, will result in a net saving of £110,000 over that period.</td>
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<tr>
<th>Adult Social Care</th>
<th>Helping people live independently with less direct help from social care by:</th>
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</thead>
<tbody>
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<td></td>
<td>• Setting up community clinics. This would mean that people would get their needs met by having appointments at clinics in communities instead of a home visit. These might be in convenient places like doctor’s surgeries or village halls.</td>
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<td></td>
<td>• We would like to come up with a proposal to give people who can attend clinics immediate</td>
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<tr>
<td>28.1 We would be supportive of services being provided on a more localised basis through setting up early help delivery hubs and regard this as an extension of the early help work both councils have been collaborating on, however we would want to ensure that residents still have access to the same range of services.</td>
<td></td>
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and don't need council services

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<thead>
<tr>
<th>Children’s services – Provision of parenting support</th>
<th>We have contracts with four organisations to provide parenting support programmes. They offer advice, one-to-one support and group programmes for parents and carers. We are proposing to not renew these contracts when they end in March 2017. We would continue to provide parents and carers with parenting support. Targeted family support activities would be provided by our early help teams. Other organisations that run services on our behalf, such as children’s centres, health visitors and 0.4</th>
</tr>
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<tr>
<td></td>
<td>As an early adopter of the principles of early help the Council is supportive of providing parental support through the collaborative early help hub and community connector, however, we would want to ensure that the level of help available is not diminished by ending the contracts with the four providers.</td>
</tr>
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</table>
| **Children’s Services – Reduce funding for youth work** | **2.13** We are concerned about reducing the funding for youth work and ensuring the young people receive help and advice sooner rather than later.  
Our concern would be the long term impact if younger people are not encouraged into employment or education. We are keen to work with the County Council to outline how we can ensure our local young people are supported to make the best start in life, particularly through our shared early help initiative. |
| --- | --- |
| Gradually stop the funding we give to our youth advisory boards to pay for local activities for young people, whilst they find alternative sources of funding over the next three years  
Stop the funding we give to our youth advisory boards to pay for positive activities for young people that are at risk of becoming not in education, employment or training (NEET) or at risk of coming into care  
Stop funding the young people and debt project in Norwich  
Reduce our funding for Momentum Norfolk by 45%  
Reduce our funding for promoting activities to young people. | |
| **Children’s Services – Providing support to families who are struggling to cope with the challenges** | **1.16** We believe that early intervention is key to delivering both the best long term outcomes for the individuals and their families. However we must ensure that measures are in place to support families to ‘step down’ towards universal services, and issues not left to escalate further.  
We are also interested to understand how the changes to the services will support the county |
| We are proposing to not renew the contracts we have for the Family Intervention Projects when they end. They work with families who have multiple challenges in their lives, such as unemployment, homelessness, poor school attendance, substance misuse, domestic abuse and mental and physical health problems.  
Instead our Troubled Families and early help | |
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<tr>
<th>Children’s Services – Keep all children’s centres open and focus their work on supporting the families that need them the most</th>
<th>We are proposing to keep all children's centres open and focus their work on supporting the families that need them most.</th>
<th>3.04 We welcome the proposal that all children’s centres be kept open. We want to continue working to ensure that children’s centres link up to our early help hub services to ensure local families receive the support they need.</th>
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<tr>
<td>Fire &amp; Rescue</td>
<td>In the past our service focused on responding to fires and road accidents. Our current role, as expressed in our strategic vision, is much broader than that. We now work in communities to prevent fires, reduce the impact of fires and emergencies and respond to a wide range of emergencies. Do you agree or disagree with our proposed strategic vision?</td>
<td>South Norfolk Council is committed to working with our partners including the Fire &amp; Rescue Service.</td>
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<tr>
<td>Fire &amp; Rescue - Reduce the amount we spend on fire and rescue operational support – the services that help firefighters in carrying out their emergency response duties</td>
<td>We propose to change the composition and ways of working of our management and technical teams whilst also making staff reductions in other support services. This would include reducing layers of senior and middle management and reducing our operational training budget.</td>
<td></td>
</tr>
<tr>
<td>Fire &amp; Rescue - Move full-time firefighters from King’s Lynn and Gorleston to Thetford, Dereham and other market</td>
<td>Risks in Norfolk have changed and we are proposing to move our resources to where they are more useful after studying the evidence available. We also propose to introduce 12 hours shifts for all full-time firefighters so that each full-time station has the same start and finish times. This will make it easier for us to manage emergency response cover across the county</td>
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</table>

1.2 South Norfolk Council wants to ensure that front facing services remain effective and the right level of service is provided,  

<p>| Non | We are supportive of the proposal to make more effective use of resources, as long as it is not a detriment to the service level. |</p>
<table>
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<tr>
<th>towns and introduce a 12 hours shift pattern for all full-time firefighters</th>
<th>Fire &amp; Rescue - Redesign Fire and Rescue on-call (retained) emergency response resources, including closing two fire stations</th>
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<tbody>
<tr>
<td>Over the next three years we are proposing to save up to £525,255 by reducing the number of on-call (retained) firefighters we employ by 86. We would make this saving by:</td>
<td>0.7</td>
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<tr>
<td>• Reducing the number of firefighters at the following on-call (retained) stations down to a minimum level: Great Yarmouth, Hethersett, King’s Lynn North, Thetford and Dereham</td>
<td>The Council would be concerned that the proposals outlined would have a negative impact on its residents in particular those who are served by the retained fire stations at Diss and Wymondham.</td>
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<tr>
<td>• Removing the second fire engine and its crew from the following on-call (retained) stations and replacing it with a 4x4 vehicle: Cromer, Diss, Fakenham, Sandringham, Wymondham.</td>
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<tr>
<td>These two proposals combined would save £197,348 and the reduction of 30 on-call (retained) firefighter posts.</td>
<td></td>
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<tr>
<td>• Removing on call (retained) fire engines and</td>
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<tr>
<td>Fire &amp; Rescue - Redesign Fire and Rescue full-time (wholetime) emergency response resources</td>
<td>• Reducing the number of full-time firefighters we employ by 12 with the option of moving six of these to Thetford. King’s Lynn North and Gorleston currently have full-time crews 24 hours a day, seven days a week. This proposal would reduce that to 12 hours a day, seven days a week. Both stations also have on-call (retained) firefighters who would continue to provide 24 hours a day cover. King’s Lynn South station is not affected by this proposal. Moving six firefighters to Thetford would increase fire cover there to 12 hours a day, seven days a week. This proposal would save £315,245 if we reduce the number of full-time firefighters we employ by 12, or £160,250 if we moved six 0.6</td>
</tr>
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</table>
to Thetford and reduced full-time firefighters by six.

- Changes to our Urban Search and Rescue team. The choices are to either make more use of our USAR team where they are already based at Dereham to provide emergency response cover 12 hours a day, seven days a week or to move them to North Earlham fire station in Norwich and merge them with the fire crew already there. This proposal would improve fire cover if USAR remain located at Dereham or save £325,350 if they move to North Earlham where full-time firefighter numbers would reduce by 12. This would require a one off £150,000 investment to make this move.

| Fire & Rescue - Norfolk Fire and Rescue Service role in responding to flooding emergencies | After the floods of 2007 we received grant funding from Government to help us respond to flooding - this was in addition to a grant allocated by the County Council. This allowed us to set up a specialist water rescue and flooding service. In return for this grant, we were expected to attend incidents outside Norfolk, providing specialist expertise across the country. However, this | As there is an increase in the number of incidents of flooding the Council would support retaining this service, however it would like to work collaboratively with the fire service and other public agencies to ensure the service is as effective and efficient as possible. |
National funding is coming to an end in 2017. If, however, we want to keep providing a flood response for Norfolk after 2017, we would have to save money from elsewhere in order to fund it.

<table>
<thead>
<tr>
<th>Libraries, museums, arts, records &amp; registration services - Reduce grants provided by the Norfolk Arts Service</th>
<th>Since 2010, we have reduced the grant funding we award to arts organisations from £348,900 to £85,000. However, we need to make further significant savings over the next three years and we are proposing to reduce the amount of grant funding we award to arts organisations by a further £10,000 in 2016-17</th>
<th>0.03</th>
<th>Supporting the arts brings great benefits for residents as well as attracting visitors to the County, bringing economic benefits. We would be particularly disappointed to see arts and sports funding be removed from those initiatives which support more vulnerable residents.</th>
</tr>
</thead>
</table>
| Libraries, museums, arts, records & registration services - Install technology to enable libraries to open with self-service | We are proposing to:  
- Spend £920,000 on installing technology to enable libraries to be used without any staff being present  
- Reduce the staffed opening times for the Norfolk and Norwich Millennium Library; and  
- Reduce the amount we spend on library stock. | 1.8 | We recognise that technology can promote a more efficient alternative, however we would welcome how this could be used in a multi-faceted way in the existing library service. |
<table>
<thead>
<tr>
<th>Libraries, museums, arts, records &amp; registration services - Reduce the public mobile library fleet from nine to eight vehicles, reduce the</th>
<th>Our mobile libraries will continue to stop at all the places they currently do, however we are proposing to:</th>
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<tbody>
<tr>
<td></td>
<td>• Reduce the number of mobile libraries from nine to eight</td>
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<td></td>
<td>• Decrease how often the mobile libraries visit some communities</td>
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<tr>
<td></td>
<td>• Stop the two Saturday routes which visit Bowthorpe, Queens Hills, Spixworth and Horsford</td>
</tr>
<tr>
<td></td>
<td>• Stop running the mobile library which visits 0.2</td>
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</table>
| | The Council is pleased that the mobile library service will continue to stop at all the current venues. It would be interesting to explore the possibility of electronic devices being used to loan digital books as a cost effective alternative.
<table>
<thead>
<tr>
<th>Libraries, museums, arts, records &amp; registration services - Reduce the opening hours, staffing and work of the Norfolk Record Office.</th>
<th>frequency of some visits, stop the Saturday routes and change how we deliver books to residents of care homes.</th>
</tr>
</thead>
<tbody>
<tr>
<td>We are committed to making sure that Norfolk’s history is accessible to the public. However we need to make significant savings and so we have to think again about what we can do. As a result we are proposing to:</td>
<td>care homes; and</td>
</tr>
</tbody>
</table>
| • Reduce the opening hours of the Norfolk Record Office to approximately 24 hours per week  
• Only accept new items for the archives on two days a week by appointment  
• Stage exhibitions when they are funded externally  
• Stop purchasing documents to add to our collection  
• Reduce the amount of conservation work we | • Allow care homes to pay for the service for their residents or use volunteers to provide books for individuals living in care homes. |
| 0.1 | We would ask the County Council to consider whether the archives could utilise technology to enable users to access and upload files remotely. |
| Libraries, museums, arts, records & registration services - Close four part-time registration offices at Downham Market, Fakenham, Watton and Swaffham and look for ways to provide services in other public buildings at no cost. | By law we have to provide a face-to-face registration service for births, deaths and marriages. We currently do this through 11 offices across the county, some of which provide venues for weddings.

We have looked long and hard at how we can make savings to our current budget for this service and are proposing to close four part-time registration offices from April 2016 that are least used and offer the least value for money. These are Downham Market, Fakenham, Swaffham and Watton.

However, we would try to find other places in those towns where we could share accommodation at no cost, and still offer a registration service for local people.

An alternative for people would be to use any of our seven remaining offices, but clearly they | 0.08 | We are supportive of utilising other places within towns to share accommodation for this service and working more efficiently at a community level, however we would want to ensure that this is not to a detriment of those needing to use the registration service. |
would need to travel for this. The closest offices to those we propose to close are Dereham and King's Lynn.

| Libraries, museums, arts, records & registration services – Ideas for saving money in 2017-19. | One idea we've had for saving money between 2017-19 is to change how the Norfolk Museums Services operates, by creating three main museums (at Norwich Castle, Gressenhall and Time and Tide) and reclassifying the other seven museums as community sites. These community sites would have regular opening hours, but offer a more basic service. | Not available | Our Norfolk museums play an important part in our local cultural activities. We would like to see the community capacity built across the County to support these ventures. |
| Roads, transport, waste, environment and planning - Change our Historic Environment Service so that we only do what we have to by law. | The Historic Environment Service (HES) provides information and expert advice to all of Norfolk’s local planning authorities (District Councils as well as the County Council).

In addition to this service HES also currently provides other services which include:
- Providing reports on historic buildings
- Delivering a programme of outreach and community engagement, organising and delivering heritage events and supporting communities | 0.2 | The Council currently contributes towards this service, and would like to work with the County Council to understand the implications regarding this funding and alternative service provision. |
| Roads, transport, waste, environment and planning | We are proposing to: | 0.04 | We are aware that the service which has been provided to both town and parish councils has been very beneficial. We would want to ensure that any future costs incurred to parish and town councils were proportional and affordable. |
| Roads, transport, waste, environment and planning | We are proposing to switch the use of £3m from our capital budget to highways maintenance activities so that we can save that money from our revenue budget. | 3.0 | Whilst we are supportive of ensuring the maintenance of the counties roads we are concerned of the longer term impact of this proposal of less investment in the highways network and how this may affect the economic growth of the area. The provision of infrastructure is a function that we already deliver in collaboration, through the Greater Norwich Growth Board with the pooling of CIL, and we are keen to ensure that significant investment from the County Council is able to continue, rather than cutting one source of funding to substitute it with another. |

- Identifying and recording archaeological finds.

- Roads, transport, waste, environment and planning
  - Spend less money measuring and analysing the traffic in Norfolk.

- Focus the work of the team on projects where we receive funding for analysing traffic (this would mean we would no longer be able to support parish councils or businesses with traffic counts or speed measurements for free).

- Stop providing traffic marshalls in Norwich city centre.

- Use our capital budget to pay for some highways maintenance.
crossings. This would reduce the number of minor improvements and major structural schemes, such as re-surfacing roads.
- We would do fewer improvements, such as new footpaths and road crossings that often come from local community requests
- Overall, we would be investing less in the highways network.

<table>
<thead>
<tr>
<th>Roads, transport, waste, environment and planning</th>
<th>Doing less grass cutting, weed spraying and work on verges, hedges and trees (in 2015-16 we spent £2.68m on this)</th>
<th>1.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Spend less on maintaining roads, maintaining bridges and gritting.</td>
<td>Doing less work on road drainage (in 2015-16 we spent £1.39m on this)</td>
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<td>- Replacing road markings less often (in 2015-16 we spent £0.52m on this)</td>
<td>Reducing non-essential bridge maintenance (in 2015-16 we spent £0.80m on this)</td>
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<tr>
<td>- Reducing the winter service, including gritting fewer minor roads and no longer filling grit bins provided by town and parish councils (in 2015-16 we spent £3.42m on this).</td>
<td>We would welcome the opportunity to discuss where both Councils can work together on maintaining the verges to maximise efficiencies. We are concerned that by not providing salt for grit bins this may lead to more trips and falls, especially among the elderly which could result in further pressure on adult services. We are also concerned that reducing the gritting of roads will cause more road accidents and could prevent people getting to work, which would have a negative impact on the economy.</td>
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<tr>
<td>Roads, transport, waste, environment and planning</td>
<td>Redesign the way we work on activities</td>
<td>2.8</td>
</tr>
<tr>
<td>- We would like to work with the County Council on</td>
<td></td>
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</tbody>
</table>
| Roads, transport, waste, environment and planning – Other savings planned for 2017-19 | Work differently to support economic development projects by increasing the use of existing expertise to help identify alternative sources of funding rather than directly funding them ourselves  
Increase external funding for environment services and expanding the existing volunteer base  
Move to a locality way of working, combining some teams and functions to reduce duplication and reduce staff numbers  
Review how much we spend on transport, | Not available | We would like to continue to collaborate with the County Council around economic development projects and to build on the work that is taking place through the pooling of business rates. There is an opportunity for the resources at Districts level, County and the New Anglia LEP to work more efficiently and effectively together and to remove duplication.  
As the County is aware, as a district we fully support locality working and would like to work with the county to develop a model that is right for the locality. |
A separate piece of work is being carried out to look at how we can improve Waste management and Recycling in Norfolk. A separate consultation will be carried out in 2016 to establish our overall Waste Management Strategy.