Cabinet

Monday 30 October 2017

9.00 am, Colman and Cavell Rooms
South Norfolk House, Cygnet Court, Long Stratton, Norwich, 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
<table>
<thead>
<tr>
<th>Members of the Cabinet</th>
<th>Portfolio</th>
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</thead>
<tbody>
<tr>
<td>John Fuller (Chairman)</td>
<td>The Economy and External Affairs</td>
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<tr>
<td>Mr M Edney (Vice Chairman)</td>
<td>Stronger Communities</td>
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<tr>
<td>Mrs Y Bendle</td>
<td>Housing, Wellbeing, Leisure and Early Intervention</td>
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<td>Mr B Stone</td>
<td>Finance and Resources</td>
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<td>Mr L Hornby</td>
<td>Regulation and Public Safety</td>
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<td>Mrs K Mason Billig</td>
<td>Environment and Recycling</td>
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**Group Meetings**

Conservatives – 8.00 am, Cabinet Office

Liberal Democrats – 8.15 am, 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 5)

4. To confirm the minutes of the meeting of Cabinet held on Monday 9 October 2017; (attached – page 6)

5. Performance, Risks, Revenue and Capital Budget Position Report for Quarter 2 2017/18; (report attached – page 14)

6. Treasury Management Quarter 2 2017/18; (report attached – page 68)

7. South Norfolk Council Response to the Babergh and Mid Suffolk Joint Local Plan – Regulation 18 Consultation (August 2017); (report attached – page 79)
8. Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk;  
(report attached – page 96)

(report attached – page 153)

10. Housing Support and Regulation Strategy and Associated Policies;  
(report attached – page 171)

11. Car Parking Proposals;  
(report attached – page 211)

12. Cabinet Core Agenda;  
(attached – page 217)
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.
AGENDA ITEM 4

CABINET

Minutes of a meeting of the Cabinet of South Norfolk District Council held at South Norfolk House, Long Stratton on Monday 9 October 2017 at 9.00 a.m.

Members Present:

Cabinet:  Councillors  J Fuller (Chairman)  Y Bendle, L Hornby, K Mason Billig and B Stone

Apologies:  Councillor  M Edney

Non-Appointed:  Councillors  V Bell, D Bills, N Legg and T Lewis

Officers in Attendance:  The Chief Executive (S Dinneen), the Director of Growth and Business Development (D Lorimer), the Director of Planning and Environment (T Horspole), the Director of Communities and Well-Being (J Sutterby - for part of the meeting), the Head of Environmental Services (B Wade), the Planning Policy Manager (A Nicholls), and the Procurement Consortium Manager (I Purdom)

2574  DECLARATIONS OF INTEREST

Cllr J Fuller declared an “other” interest in item 6 (minute 2578), the Norfolk Strategic Framework Consultation, by virtue of being the Chairman of the Norfolk Duty to Co-operate Member Forum.

2575  MINUTES

The minutes of the meeting held 17 July 2017, were confirmed as a correct record and signed by the Chairman.
2576 CHAIRMAN’S ANNOUNCEMENTS

The Chairman welcomed Jamie Sutterby, the newly appointed Director of Communities and Well-Being, to the Council.

2577 A NEW ECONOMIC STRATEGY FOR NORFOLK AND SUFFOLK

The Subject of the Decision

Members considered the report of the Director of Growth and Business Development, which presented Cabinet with the New Economic Strategy for Norfolk and Suffolk, developed in partnership with local authorities, universities, colleges, business sector leaders and the New Anglia Local Economic Partnership (LEP).

The Director of Growth and Business Development presented her report, explaining that the Council had been proactively involved in the drafting of the new Strategy. She stressed the importance of close alignment with the South Norfolk Economic Growth Strategy, as this would increase the chances of securing Government funding to support the Council’s growth ambitions.

Members welcomed the report and the long-term aspirations of the new Strategy. Cabinet agreed that a review of South Norfolk’s own Economic Growth Strategy should be undertaken to allow for greater alignment of targets.

During discussion, mention was given to the list of food and drink companies (under Advanced Agriculture Food and Drink), and it was suggested that this might require editing, following recent reports that Britvic was likely to leave its site in Norwich. Members expressed concern at the impact this would have on Norwich and the wider area, and it was suggested that a smaller site for Colman’s should be sought, to enable it to carry on operations in the area. The Chief Executive advised that Norwich City Council would be providing advice to the companies involved and their employees during this time. The Chairman added that the LEP would also play a role in ensuring the best outcome for the county.

In response to a query regarding the figures for housing growth, officers confirmed that these were evidence based figures obtained through the Strategic Housing Market Assessment.
The Chief Executive advised Cabinet that the new Strategy did differ from the LEP’s 2014 Strategic Economic Plan, in that the 2014 document had been a bidding platform for government funding. The new Strategy built on those foundations and members noted that the Chief Executive was a member on the steering group, set up to ensure a plan for delivery.

The Decision

**RESOLVED:**

1. To endorse the New Economic Strategy for Norfolk and Suffolk;
2. That the proposed adjustments to be made to the South Norfolk Economic Growth Strategy, be discussed at the Growth, Infrastructure and Environment Policy Committee prior to being referred back to Cabinet for agreement

The Reasons for the Decision

To support collaborative working, helping to drive growth and investment to the District
To ensure close alignment with the South Norfolk Economic Growth Strategy, to maximise opportunities to secure government funding.

Other Options Considered

None.

2578 NORFOLK STRATEGIC FRAMEWORK CONSULTATION

The Subject of the Decision

Members considered the report of the Planning Policy Manager, which invited Cabinet to note and comment on the contents of the draft Norfolk Strategic Framework (NSF).

Cllr J Fuller reminded members of the background to the report and explained that the document not only provided the evidence needed to demonstrate how the Duty to Co-operate was being discharged, but it also was helpful in that it set out how all Norfolk
authorities would work together to best manage key cross-boundary planning issues, such as infrastructure and housing. Members also noted the potential for future savings through further joint commissioning of evidence base work.

The Planning Policy Manager presented his report to members and drew attention to the points raised during consideration of the NSF at the Regulation and Planning Policy Committee, held 20 September. Members noted that the Committee had suggested that there was a need for more weight to be given to the rural economy and to specifically mention the A140 corridor. There had also been a suggestion for an additional agreement around standard timeframes for 5-year land supply permissions.

In response to a query regarding targets for housing growth, the Planning Policy Manager explained that a sound evidence base for these figures had been obtained through the Strategic Housing Market Assessment, which examined the need for growth up to 2036. Norfolk had been divided into three housing market areas, which had been defined with the help of consultants, through the examination of the strength of self-containment in relation to jobs and houses.

During discussion, some concern was expressed regarding the ability of Norwich City Council to deliver on future housing growth targets. Whilst Norwich might not be able to entirely accommodate its own housing needs, Cllr Fuller assured members that there were opportunities for (re)development in Norwich, and as a central hub for economic growth, the City would have to deliver identified minimum housing numbers.

The Decision

RESOLVED: To:

1. Agree and submit the comments made in paragraphs 3.10-3.14 of the report, seeking improvements to the sections on rural economy, housing delivery, telecoms, transport, and the inclusion of a new overarching diagram;

2. Delegate to the Director of Planning and Environment, in consultation with the Cabinet Member for External Affairs, to agree and submit the precise wording of the response, which will also include a schedule of identified spelling mistakes and similar minor errors.
The Reasons for the Decision

To ensure that the document covers all key strategic planning issues, whilst demonstrating that the Duty to Co-operate is being discharged.

Other Options Considered

None.

2578 SOUTH NORFOLK COUNCIL RESPONSE TO THE WAVENEY FIRST DRAFT LOCAL PLAN (JULY 17)

The Subject of the Decision

Members considered the report of the Planning Policy Manager, which sought Cabinet approval for the South Norfolk response to the Waveney First Draft Local Plan.

The Planning Policy Manager outlined his report, explaining that some South Norfolk settlements might benefit from the planned growth in both Beccles and Bungay. However, it was also recognised that there could be traffic impacts on the A143 and A146, creating congestion in key areas in the South Norfolk district. Members noted that overall, officers were broadly supportive of the Plan, felt it to be well written, and welcomed East Suffolk Council’s continued commitment to engage with South Norfolk.

Cllr K Mason Billig, whose ward bordered East Suffolk, agreed that the A146 was a problem during peak times, and that housing growth in this area would exasperate this issue. Congestion on ‘A’ roads was a problem, and this sometimes led to alternative routes being sought and the creation of “rat runs”. With regard to flooding, Cllr Mason Billig stressed the need for a cohesive strategy to flooding on both sides of the River Waveney, and the need to focus on the issues that were important to communities, referring in particular to health and wellbeing, and transport.
The Decision

RESOLVED: To agree the South Norfolk Council response to the Waveney First Draft Local Plan consultation, as outlined at Appendix 1 of the report;

The Reasons for the Decision

To ensure that the impacts of the Waveney Local Plan on the South Norfolk District, are fully considered.

Other Options Considered

None.

2579 FUTURE MANAGEMENT OF STREET LIGHTS

Members noted that the report regarding the future management of street lights would be considered at a future meeting of the Cabinet.

2580 GREATER NORWICH LOCAL PLAN

Members noted that the report regarding the Greater Norwich Local Plan would be considered at a future meeting of the Cabinet.

2581 INFRASTRUCTURE INVESTMENT PLAN

Members noted that the report regarding the Infrastructure Investment Plan would be considered at a future meeting of the Cabinet.
2582 RESPONSE TO MID-SUFFOLK AND BABERGH LOCAL PLAN

Members noted that the report regarding the Council’s response to Mid-Suffolk and Babergh Local Plan would be considered at a future meeting of the Cabinet.

2583 CABINET CORE AGENDA

Members noted the latest version of the Cabinet Core Agenda.

2584 EXCLUSION OF THE PUBLIC AND PRESS

It was

RESOLVED: 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)

2585 GREEN GARDEN WASTE PROCESSING AND DISPOSAL CONTRACT

The Subject of the Decision

Members considered the exempt report of the Head of Environmental Services and the Procurement Consortium Manager, which sought Cabinet approval for the award of contracts for green garden waste processing and disposal services.
The Head of Environmental Services presented the report to members.

During discussion, members commended officers on the success of the Council’s garden waste collection service. In response to a query, Cabinet was informed that although some contamination did occur in the brown bins, this had not proved to be a significant issue.

The Chairman sought clarification regarding the end date of the contract, expressing concern that the Council could be out of contact during peak collection times. The Head of Environmental Services assured members that the Council controlled the cessation of contract (as detailed in paragraph 5.2.3 of the report), and that any future changes would be carefully planned.

The Decision

RESOLVED: To approve the award of the green waste processing and disposal contract as outlined in paragraph 7.1 of the report.

The Reasons for the Decision

To seek value for money, social value and revenue generation

Other Options Considered

As outlined in the report

(The meeting concluded at 10.06 am)

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Chairman

Cab Min 09/10//17CLW
Performance, Risks, Revenue and Capital Budget Position Report for Quarter Two 2017/18

Report of the Accountancy Manager / Business Improvement Programme Manager / Senior Governance Officer

Cabinet Member: Barry Stone, Finance and Resources

CONTACT
Revenue/Budget: Matthew Fernandez-Graham 01508 533915
mgraham@s-norfolk.gov.uk

Performance: Andrew Mewes 01508 533656
amewes@s-norfolk.gov.uk

Risk: Emma Goddard 01508 533943
egoddard@s-norfolk.gov.uk
1. Introduction

1.1 This report details the Council’s performance against strategic measures, risk position and financial position for the second quarter of 2017/18, and seeks approval for other consequential matters.

2. Overview

2.1 Performance: In February 2017, Cabinet approved the annual Corporate Business Plan for the 2017/18 financial year which included a set of strategic measures aligned to our corporate priorities. These measures are monitored and reported on a quarterly basis to Cabinet. Appendix 1 provides the detailed performance report for quarter 2. The table below provides a summary.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
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<tbody>
<tr>
<td>Green</td>
<td>22 Measures met or exceeded the target.</td>
</tr>
<tr>
<td>Amber</td>
<td>3 Measures are within an acceptable tolerance of target.</td>
</tr>
<tr>
<td>Red</td>
<td>3 Measures did not reach the stretched target.</td>
</tr>
<tr>
<td>Baseline</td>
<td>5 Measures are ‘baselined’ in order to determine the target.</td>
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2.2 **Risk management:** Managers have undertaken a review of all Strategic, Directorate and Operational risks. In light of this, the current organisational capacity position is highlighted below; this demonstrates that at present all risk factors are positive, indicating the Council is proactively managing risks and capable of realising opportunities as they are identified. The table below presents a position that will assist the organisation achieve its ambitious targets for the future. The Strategic Risk Register is outlined in Appendix 2.

<table>
<thead>
<tr>
<th>Capacity Indicator</th>
<th>Present Position</th>
<th>Present Risk Acceptability</th>
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<tbody>
<tr>
<td>Financial</td>
<td>The Medium Term Financial Strategy agreed in February 2017 shows that the Council’s Budget is balanced for 2017/18, 2018/19 and 2019/20 after taking account of income and savings identified in those years. Work is ongoing to identify measures to balance the budget from 2020/21 onwards and will be brought to Cabinet in due course.</td>
<td>+</td>
</tr>
<tr>
<td>Service Delivery</td>
<td>Potential Options for collaborative working with Broadland District Council are being explored to future proof the provision of services. The Council continues to perform strongly against its suite of strategic performance indicators. The Q2 position is favourable with only three of the 33 measures not reaching their stretched targets and we have plans in place to address these.</td>
<td>+</td>
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<tr>
<td>Legal / Compliance</td>
<td>No significant legal / compliance issues have been raised over the past quarter and the status remains the same. The Council is reviewing all information governance to ensure that systems are in place in order to comply with new data protection laws (General Data Protection Regulation (GDPR)) in May 2018.</td>
<td>+</td>
</tr>
<tr>
<td>Reputation</td>
<td>The Council continues to retain a good reputation both nationally and regionally. The Council has recently been awarded Investor in People Platinum, one of the top 0.05% of organisations in the UK to achieve the award.</td>
<td>+</td>
</tr>
<tr>
<td>Human Resources Capacity</td>
<td>This remains strong and the Strategic Leadership Team continues to be in a position to drive the Council forward. It will continue to ensure that the Council has the right skills and resources in place to fulfil the needs of the organisation and make interim appointments where appropriate to ensure service continuity and delivery of key functions.</td>
<td>+</td>
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2.3 **Revenue Position Quarter Two**

The budget for 2017/18 was set by the Council in February 2017.

The total net budget to the end of September was (£62k). The actual total expenditure, net of income and excluding Housing Benefit payments, was (£1,181k). This therefore produced a positive variance against the revenue budget of £1,119k. The position at the end of September is set out in the graph below.
A more detailed analysis of the main areas of variance by service is attached as Appendix 3. These variances are the direct costs of each service and exclude recharging between services for overheads, depreciation charges and technical financial adjustments required for statutory reporting purposes at the end of the financial year.

2.3.1 Pay and staffing budgets

There are vacancies in several areas across the Council, which include Building Control, Housing and Planning. Interim staffing arrangements in these areas did not fully offset the savings from vacancies. The overall position on staffing budgets at the end of September is a positive variance of £665,000. This represents 7.45% of the staff related budgets which compares to 8.37% reported at Quarter 1, as some posts have been filled over the summer. At the equivalent point last year, the positive variance was £452,000.

2.3.2 Non Pay Budgets

Non-pay budgets were reduced for 2017/18 as part of the 10% challenge on budgets. Overall at the end of Quarter 2, there was lower than budgeted non-pay expenditure across the Council resulting in a positive variance of £878,000. This represents 6.71% of the non-pay budget.

Performance for Quarter 2 on payments is shown in the graph below which show the total value of invoices approved on the finance system but not yet paid (these are referred to as ‘Trade Creditors’). The Council pays most of its suppliers within 30 days. 96% of all undisputed supplier invoices have been paid within 30 days for Quarter 2.
2.3.3 Income Budgets

Income budgets were increased significantly for 2017/18 as part of the 10% challenge on budgets to reflect higher demand and increases to some fees and charges. Overall income was £424,000 lower than budgeted across the Council in Quarter 2. This represents 1.92% of the income budget, which is greater than the proportion for quarter 1 (0.39%). Not all fees were increased from 1st April, with some increases planned for later in the financial year and therefore income was less than budgeted. For example, in areas such as building control, garden waste, leisure and car parks, the full impact of recent fee and charges changes can only be fully assessed over a 12 month period. Officers are examining these areas to ensure that all required actions are taken to meet the income budgets set, but the current forecast is that income budgets will be met overall by year end.

Trade Debtors are all invoices raised by the Council and where we are awaiting payment. Performance on overdue invoices for Quarter 2 compared to Quarter 1 is shown in the graph below. These invoices include charges for CNC Building Control, Community Infrastructure Levy, Rent Assisted Deposits and charges for Sewerage Services. £933,810 has been raised in the current financial year in relation to Community Infrastructure Levy (CIL).
2.3.4 Capital Budget and Expenditure Quarter Two

The report details the overall position on the Capital Programme. Expenditure to the end of September was £2.29 million compared to a budget of £3.44 million.

The two graphs below show the variances on the 2017/18 capital programme. The main variances relate to Waste Vehicle Replacements, Aids and Adaptations/Disabled Facilities Grants, Wheeled Bin Replacements, and Toilet Refurbishments. Further details of the variances on individual capital projects are included by relevant theme later in this report and in Appendix 4.
Cumulative Expenditure on Major Capital Schemes Quarter 2 2017/18

- Budget Quarter Two
- Outturn Quarter Two

- Improved Leisure Provision
- Disabled Facilities Grants
- Vehicle Procurement and Replacement
- BSPM Rental Home Purchases
- Toilet Refurbishments

£0, £200,000, £400,000, £600,000, £800,000, £1,000,000, £1,200,000, £1,400,000, £1,600,000
Cumulative Expenditure on Other Capital Schemes Quarter 2 2017/18

- New IT Projects
- Wheeled Bin Purchase
- Green Deal Grants
- Play Area Refurbishments
- Decent Home Loans
- Car Park Improvements
- Diss Heritage Triangle

Budget Quarter Two
Outturn Quarter Two

Budget and outturn comparison for various capital schemes in Quarter 2 2017/18.
3 Combined Performance, Risk and Financial Commentary by Corporate Priority

3.1 Economic Development

The number of new business start-ups supported (LI 613) was 96 in quarter 2, which means that we have already exceeded our year-end target of 75. Increasing numbers of new businesses are being supported from our new business space within Crafton House at Poringland and it is therefore anticipated that this target will be increased for 2018/19.

The Norwich Research Park Enterprise Zone Grant Agreement with Bullen Development Ltd was signed on the 11th July 2017. This helps to mitigate the Strategic Risk associated with the Enterprise Zone (S1). Work to deliver progress on the rest of the Enterprise Zone site is ongoing.

As at the end of September, we have had a total of 114 new apprenticeships placements (EG 1605) available in our local businesses and have already exceeded our year-end target of 70. Relating specifically to our Council, we currently have 8 apprentices and in line with government policy, we are working towards having 12 in place in by the end of March 2018.

The amount of external funding identified and brought into the local economy (LI 758) is £416,550. This is below the Quarter 2 target of £500,000. However, 3 new pooled business rates projects are anticipated to be signed off for around £530,000 in Quarter 3. There has been an additional £116,550 funding in Q2. European Structural funding has been secured from the Breck’s Local Action Group (LAG) to deliver the Wymondham Digital Heritage Trial which forms part of the Visitor Economy initiative. SLT has agreed the terms of the funding contract with Norfolk County Council who are the accountable body for this project. Work will be commissioned from a single supplier which has been agreed by SLT and the Leader of the Council. Cabinet is asked to note this in line with Contract Standing Orders. Cabinet is also requested to approve the associated expenditure of £116,550 in order for this...
project to proceed. It is anticipated that the trial will go live in the summer of 2018. Once completed, we will claim the grant monies agreed in the contract via Norfolk County Council.

3.2 Business Rates

Performance on non-domestic rates (NDR) collected (BV010) in quarter 2 is up on the same period last year. The NDR team have focused their efforts on maximising income and resolving queries to achieve this. There is a positive variance of £324k on South Norfolk Council’s share of NNDR (business rates) income. This is due to a higher than expected share of NNDR income for SNC, together with greater Section 31 grant income from central government. However, there is a lower than budgeted levy, owing to higher than anticipated costs of successful appeals and the ongoing impact of actual appeal decisions, particularly with regard to larger business premises. 

£142k of income from businesses on the Norwich Research Park Enterprise Zone is included in this variance and this income will need to be transferred to the Enterprise Zone Reserve at year end to cover the costs of further development on the site, with associated borrowing.

As Cabinet will be aware, South Norfolk Council has been participating in a pooling arrangement to the benefit of all Norfolk Councils. All Norfolk Councils were invited to submit a joint bid to DCLG to establish a one-year pilot for 100% retention of business rates for 2018/19. The bid had to be submitted by 27th October and the agreement of all Councils was required for the bid to proceed. Owing to this timetable, the Leader of the Council, in consultation with the Chief Executive and Section 151 Officer, agreed to participate in this bid and Cabinet is requested to endorse this action.

3.3 Property Development and Management

Overall the indicator for percentage of rental income returned from our property investments has exceeded quarter 2 target (LI358), reflecting high levels of occupancy and the lettings at Crafton House. Furthermore, in relation to residential dwelling developed through Big Sky Developments (EG1601a), Quarter 2 has seen the progression of phase 2 at Rosebery Park Poringland with 14 units being delivered and sold, whilst marketing for ‘off-plan’ sales continues. Maple Park construction is progressing well, which has led to the reservation of 7 plots; 1 of which has been sold. There are two homes on the Poringland site which were originally planned to be sold on the open market. However, the Big Sky Board considers it is more commercially appropriate that these houses should be sold to BSPML for rental for at least the next two years. In order for this transaction to take place further funding
of £575k is required from South Norfolk Council and Cabinet is requested to approve this additional expenditure as part of the capital programme. This funding will be a mixture of loan and equity.

At its meeting on February 6th 2017, Cabinet agreed that Big Sky Developments could have a temporary “overdraft” facility of £500,000, which was to be repaid by 31st March 2017. Due to careful cash management, this overdraft facility was never used. However, due to it taking longer for people to secure mortgages and a general slowing of sales in line with the national position it would be prudent to allow Big Sky Developments access to an ongoing “overdraft” facility. It is proposed that this “overdraft” facility is made available to be drawn down as and if required and to be charged at the same rate of 6% as previously agreed by Cabinet on 6th February 2017.

In line with the capital programme, from July to September funding of £580,000 was transferred to Big Sky Property Management Ltd (BSPML) to purchase four of the six plots reserved by BSPML for letting on Rosebery Park. Seven affordable homes sales are also secured at this site. Marketing for ‘off-plan’ sales commenced at the end of April 2017 for Maple Park as the show home is now open, with ten plots being retained for rental by BSPML.

The 12 residential properties owned by BSPML are currently all let.

### 3.4 CNC Building Control

Fee earning income has increased during the second quarter to bring the half yearly position almost back in-line with the target (LI 1013). Traditionally income levels drop over the winter months but it is anticipated that this year the price increases which came into effect at the beginning of October will have a positive impact. There have been a number of vacancies within the team which due to the national shortage of Building Control Surveyors, are taking longer to fill than usual. The service is investigating a number of ways to maximise the existing technical expertise within the team as well as changing the way it recruits to these posts.
3.5 Leisure and Recreation

The Q2 overall growth of direct debit members was +0.61%, which in a Quarter that traditionally either flat lines or declines is encouraging with our strong 2nd half of the business year ahead. When compared Year to Year we have enjoyed an increase of our overall Direct Debit membership of +20% and crucially the monthly Direct Debit has risen by +£14,852, which equates to +£178,224 annualised. Traditionally, the summer period (Quarter 2) is the quietest Quarter in Leisure for Fitness and Swim School growth. The surplus made on Kids Camp was higher than last year, reflecting the changes in pricing agreed by Cabinet in February.

Design work for the refurbishment of Long Stratton Leisure Centre is continuing, with revisions being considered to allow for necessary underpinning work, to enable the project to be carried out in line with the overall budget for the scheme. A decision on planning permission is expected in Quarter 3.

Negotiations on the Council’s offer to invest in Harleston Leisure Centre have now ceased and this means that there will be no capital expenditure on this project.

The phased introduction of a new quality management system in line with the Industry accreditation scheme (Quest) is being progressed to enhance existing procedures within the leisure team. This builds on the achievement of gaining Quest accreditation across the service in June 2017.
3.6 Housing

In Q2, 75% of households contacting South Norfolk Council because of risk of losing their homes were prevented from becoming homeless (HE 1604) - 57 cases in Q2 with 14 unsuccessful cases, which is below the set target of 78. However, it is important to note that there has been a 26% reduction in cases in the first half of 17/18, compared to 16/17, due to prevention work of SNC. The cause of unsuccessful placements includes:
- Residents choosing social housing over private but being low priority, so not housed quickly.
- Difficulties with deposit or guarantor.
- Social issues preventing tenancy such as drugs, offending or alcohol.

One of the single biggest issues in preventing homeless cases is having a protocol in place with Housing Associations to understand when existing social tenants might be slipping into arrears. This will allow officers to better target tenants before they risk losing their tenancy, and would further reduce case numbers. The Homelessness Reduction act, coming into force in 18/19 will place greater obligation on partners to inform us of threats to tenancy. We will look to put protocols in place with our Housing Associations during this year.

3.7 Independent Living

In quarter 2, we supported 475 vulnerable people to maintain independence in their own homes (LI 323) which meets the target. A hospital discharge scheme has started to reduce the impact on homes not being ready when people are discharged and to help reduce hospital bed blocking. This will be evaluated at the end of 2017. As always, we anticipate an increase in demand on services and the numbers and incidences of vulnerable people assisted in the winter months. Expenditure on Disabled Facilities Grant/Aids and Adaptations of a combined total of £282,828 was granted up to the end of September to provide 69 grants, compared to 76 grants approved in the same period of 2016/17. Expenditure to the end of quarter 2 is relatively low compared to the budget to date. The team are confident that there is a sufficient level of activity to commit the full allocation of funding for DFGs in 2017/18 which has increased from £716k in 2016/17 to £781k for 2017/18.
3.8 Early Help

This quarter we have helped 537 families and residents to achieve positive outcomes through our Help Hub service (HE 1607), which exceeded the Q2 target of 500. We continue to see a large increase in requests for support into the help hub demonstrating the strength of the partnership. The Community Connectors Team has engaged with 4,726 people in this quarter. The connectors attended 8 flu clinic sessions in September, focused on older people. The team worked with other agencies to provide advice and support to 1,119 patients as they attended the clinic. The connectors have seen 106 people through social prescribing and the remaining people through engagement events such as South Norfolk on Show (and our Tour), Police street surgeries and mobile libraries.

3.9 Housing Benefit/Council Tax Support

In Quarter 2 the number of days taken to process new claims for Housing Benefit/Council Tax Benefit (HE 1606) was 8 days, which has outperformed the target of 9 days. Due to changes in work processes, we have been able to improve performance in this area of work despite the trend continuing of new claims for working age people being more complex to process.
3.10 Development Management

By the end of Quarter 2, we had delivered 283 affordable homes (LI 350), 128 of which had been completed through negotiation with developers. We are on course to achieve the year-end target of 300 by the end of Quarter 3.

It is anticipated that two planning applications will be lodged in December 2017 in connection to the delivery of the Long Stratton bypass, with public pre-application consultation having taken place in July and October 2017 (run by the developers, not the Council). The Government has announced it will grant £3.05 million to deliver improvements to Hempnall Crossroads.

The current (Sep-Nov) Government consultation on housing needs assessment proposes that those areas with joint 5-year land supply plans should be able to assess Objectively Assessment Need across the whole of the Plan area. This might help mitigate some of the 5-year land supply risk in Greater Norwich, but there are uncertainties at present and legal advice is being obtained on various aspects of the current housing land supply situation to clarify the position.

53% of householder applications were determined within six weeks (MI 1037) in quarter 2 and the average number of days to determine these applications was 42 days.

There is a negative variance of £57k on Development Management Budgets to the end of September, which reflects the fact that the anticipated fees for the two major Long Stratton planning applications have yet to be received. Clarity on the exact timing of the proposed national increase in planning fees is still being sought.
3.11 Waste

The net cost of waste collection per household (LI 262) for Q2 is £30.75 per household (based on 59,748 households) which is a reduction on last year and considerably under target. This reduction is due predominantly to increased income from recycling credits owing to higher volumes of garden waste collected. In addition for Q2, Missed bin numbers unfortunately increased above target. This was due to a combination of: a) a number of vehicle breakdowns including a 32-tonne truck catching fire which could only be replaced by a 26-tonne truck while being repaired which impacted capacity; b) Additional garden waste tonnage due to the weather which meant more tip visits needed leading to unfinished rounds; and c) Fewer agency staff being available to cover holidays & sickness. Going forward these issues are being addressed through:

- Return of the 32-tonne truck and imminent arrival of 3 new trucks.
- Now the garden waste disposal contract has been awarded there will be an exercise to optimise the garden waste rounds over the winter months.
- Alongside the proactive management of sickness, we are looking to train some staff to be able to take on the role of driver / loaders and working with the agencies to try & increase the number of workers available.

There was a knock-on effect on levels of overtime and agency working at the depot, though this has been offset by vacancies which have recently been filled.

An increase in gate and contamination fees from the Material Recycling Facility (MRF) has resulted in disposal costs of recyclable waste which compare adversely against budget. Recycling credits are also down resulting in a negative variance of £69k for disposal costs for the first six months of the year.

The amount of municipal waste recycled, reused and composted (NI 192a) is 46%, which meets the Quarter 2 target.

Three new refuse vehicles totalling £510k have been ordered against the Vehicle Procurement and Replacement budget for 2017/18.

The operational risk relating to changes to legislation affecting the waste services operated from Ketteringham Depot has been removed as this related to the quality and separation of recycling materials which came into force in January 2015 and it is considered that associated progress of this can be effectively monitored by the wider Directorate risk relating to the effective operation of 'best in class' refuse and recycling service.
3.12 **Resources**

The positive variance against the revenue budget of £1,120,000 in Q2 is a positive sign of the present strength of the Council’s financial position which needs to be maintained in the future. We recognise there is a strategic risk that the Council is unable to deliver priority services as revenue funding falls short of required income. However, the financial position to the end of September 2017 indicates a positive variance and that the 10% challenge is currently being met. Initial forecasts indicate that the revenue surplus at year end will be in the region of £2 million which would provide a potential additional source of funding for the Councils’ capital programme, which would reduce the need to borrow externally and the associated interest costs.

3.13 **Staff**

The number of working days lost due to short term sickness absence (BV 012a) was 1.53 per FTE. The result is under the target for Quarter 2 and less than the figure for the end of Quarter 2 2016-17 (2.07).

3.14 **IT/Digital**

In Q2, 62.42% of our top 10 service requests were made via online webforms (LI 759). The use of digital transactions continues and is set to improve further with the new website designs going live in Quarter 3.
4 Recommendations

4.1 It is proposed that Cabinet:

a) Notes the 2017/18 performance for the quarter and the combined efforts across the Directorates to deliver the vision of the Council (detail contained in Appendix 1).

b) Notes the current position with respect to risks and accepts the actions to support risk mitigation (detail contained in Appendix 2).

c) Notes the capital and revenue position and the reason for the variances on the General Fund (detail contained in Appendices 3 and 4).

d) Note the decision to commission works on the Wymondham Digital Heritage Trail and approve expenditure of £116,550 in order to deliver the project as referred to in paragraph 3.1.

e) Endorse the decision of the Leader of the Council to participate in the bid for a one year pilot of 100% business rates retention as outlined in paragraph 3.2.

f) Approve an ongoing “overdraft” facility to Big Sky Developments Limited of £500,000 as outlined in paragraph 3.3.

g) Approve additional funding to Big Sky Property Management Ltd of £575k to enable it to buy two homes at Rosebery Park as referred to in paragraph 3.3.
## APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

### Key:
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</tr>
</thead>
<tbody>
<tr>
<td>LI 1013: CNC Building Control fee earning income.</td>
<td>£765,000</td>
<td>£1,770,000</td>
<td>Debbie Lorimer</td>
<td>Fee earning income increased during the second quarter to bring the half yearly position almost back in line with the target. Traditionally income levels drop over the winter months but it is anticipated that this year the price increases which came into effect at the beginning of October will have a positive impact.</td>
</tr>
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<tr>
<td>LI 358: % rental income return from property investment.</td>
<td>5.7% 5.00%</td>
<td>Spencer Burrell</td>
<td>Rental income continues to remain above target.</td>
<td></td>
</tr>
<tr>
<td>EG 1601a: Number of residential dwellings developed through our Big Sky</td>
<td>44 Baseline (Totals shown are multi-year running totals from Q1 2016/17)</td>
<td>Spencer Burrell</td>
<td>Q2 - Rosebery Park Construction was completed with 23 left to be handed over by the contractor. A further 4 being sold (18 total) and 1 being reserved. The construction at Maple Park continues to progress well and to a high quality. The contractor has handed over 11 properties. 7 properties now reserved, 1 of which has been sold.</td>
<td></td>
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<tr>
<td>EG 1601b: Sq Metre area of commercial space developed through our Big Sky Developments company.</td>
<td>2,438 Baseline (Totals shown are multi-year running totals from Q1 2016/17)</td>
<td>Spencer Burrell</td>
<td>The running total still remains at 2,438sqm of space developed. Crafton House - Discussions have commenced with a tenant regarding the ground floor vacant space. Maple Park - Construction progress' with the frame near completed.</td>
</tr>
<tr>
<td>LI 356: Number of SME’s provided with advice and guidance in South Norfolk.</td>
<td>732 1,200 (This is a cumulative total for the whole year which will be the sum of each quarter’s result)</td>
<td>David Disney</td>
<td>Cumulative total for this year so far is 732 with 361 in Q2. The Q2 breakdown is as follows: 122- Licensing and food. 25- Local flavours (Food and Ec.Dev team) 15- Broadband engagement 20- Cyber security cluster briefing 21- L-Tag meetings 35- Corridor Briefing at Biz. Breakfasts 76- Growth Hub 47- Ec Dev Team Engagement</td>
</tr>
</tbody>
</table>

![Chart](chart.png)

![Chart](chart2.png)
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<tr>
<td>LI 613: Number of new business start-ups supported in South Norfolk.</td>
<td>96</td>
<td>David Disney</td>
<td>The cumulative total this year so far is 96 of which there have been 60 additional businesses in Q2 that have been supported in workshops or presentations at Crafton House.</td>
</tr>
<tr>
<td>LI 758: External funding identified and brought into the local economy.</td>
<td>£416,550</td>
<td>Nina Cunningham</td>
<td>There has been an additional £116,550 funding in Q2. The European Structural funding has been secured from the BRECKs LAG to deliver a visitor economy project called the Wymondham Digital Heritage Trial. 3 new pooled business rates projects are expected to secure in the region of £530,000. Due to a delay in signing off these bids, this funding cannot be included within this report.</td>
</tr>
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<tr>
<td>BV 010: % of non-domestic rates collected.</td>
<td>57.80% / 98.00%</td>
<td>Simon Bessey</td>
<td>NDR collection rates have been maintained throughout Q2. The NDR team have focused their efforts on maximising income and resolving queries.</td>
<td><img src="chart1.png" alt="chart" /></td>
</tr>
<tr>
<td>LI 210: % of food premises which have an FHRS (Food Hygiene Rating Scheme) rating of satisfactory or above.</td>
<td>97.79% / 95.00%</td>
<td>Grizelle Britton</td>
<td>We have had 4 businesses in the past quarter which have been poor and reduced the overall figure.</td>
<td><img src="chart2.png" alt="chart" /></td>
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<tbody>
<tr>
<td>EG 1605: Number of apprenticeship placements available in our local businesses for our young people.</td>
<td></td>
<td>114</td>
<td>David Disney</td>
<td>There has been a cumulative total of 114 so far, this year. In Q2, there were 67 “new” live opportunities.</td>
</tr>
<tr>
<td>MI 1039: % of units liable for business rates occupied.</td>
<td></td>
<td>92.06%</td>
<td>David Disney</td>
<td>Although the percentage of the total number of business units that are occupied has fallen slightly from the previous quarter it does not tell the full story. We are achieving growth as we do have 209 more occupied business units than at the same time last year, and an additional 238 units overall.</td>
</tr>
</tbody>
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**Chart for EG 1605:**
- Latest Data: 114 (Year End Target: 70)
- Operational Comments: There has been a cumulative total of 114 so far, this year. In Q2, there were 67 “new” live opportunities.

**Chart for MI 1039:**
- Latest Data: 92.06% (Year End Target: 93%)
- Operational Comments: Although the percentage of the total number of business units that are occupied has fallen slightly from the previous quarter it does not tell the full story. We are achieving growth as we do have 209 more occupied business units than at the same time last year, and an additional 238 units overall.
APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

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<tr>
<td>(NEW) HE 1601: % increase in our Leisure Centre members following the refurbishment of our three Centres.</td>
<td>Quarter 2 Result / Indicator 3.60%</td>
<td>Steve Goddard</td>
<td>The following provides an overview for each leisure centre.</td>
</tr>
<tr>
<td></td>
<td>Year End Target 2017/18 10.00%</td>
<td></td>
<td><strong>Long Stratton Leisure Centre:</strong> Increased its membership in Q2 by +5 Direct Debit members. We have again revised the fitness class programme, increased Personal training options and as previously mentioned increased general footfall and invested in new equipment to retain and attract customer/members. The new 3G pitch business has slowed in the off season but we continue to increase hirers for Q3/4. The impending refurbishment will generate significant interest in the centre for the year ahead.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Diss Leisure Centre:</strong> Direct Debit Fitness membership increased slightly by +13 in Q2. Diss Leisure Centre’s main income driver is Swim School which has increased again by +16 Direct Debits. New re-invigorated gym competitors in the Town has provided customers with alternatives with significant marketing campaigns so we are continuing to focus on our range and options that is the Diss Centre’s unique selling point e.g. swim/gym/aqua classes/PT/sauna and steam for just £27 per month.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Wymondham Leisure Centre:</strong> Fitness Direct</td>
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### Chart

<table>
<thead>
<tr>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
<th>Q4</th>
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<tbody>
<tr>
<td>0%</td>
<td>2%</td>
<td>4%</td>
<td>6%</td>
</tr>
<tr>
<td>8%</td>
<td>10%</td>
<td>12%</td>
<td>14%</td>
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<tr>
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<td>Quarter 2 Result / Indicator</td>
<td>Year End Target 2017/18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Debit membership remained static from Q1 to Q2 and has increased its monthly Direct Debit membership YR on YR by +27%. The centres swim school continues to perform ahead of budget and grew by a further +15 Direct Debit members in Q2.</td>
<td></td>
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<tr>
<td><strong>Leisure overall:</strong> The Q2 overall growth of fitness direct debit members was +19 (≈ +0.61%), which in a Quarter that traditionally either flat lines or declines is encouraging with our strong 2nd half of the business year ahead and when compared Year to Year is an increase of our overall Direct Debit membership by +20% and crucially our monthly Direct Debit by £14,852 (≈ +£178,224 annualised). The Q2 overall growth of direct debit members was +0.61%, which in a Quarter that traditionally either flat lines or declines is encouraging with our strong 2nd half of the business year ahead. When compared Year to Year we have enjoyed an increase of our overall Direct Debit membership of +20% and crucially the monthly Direct Debit has risen by +£14,852, which equates to +£178,224 annualised. Traditionally, the summer period (Quarter 2) is the quietest Quarter in Leisure for Fitness and Swim School growth. The surplus made on Kids Camp was higher than last year, reflecting the changes in pricing agreed by Cabinet in February.</td>
<td></td>
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## APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

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<tr>
<td>HE 1603: % of households in temporary accommodation for 8 weeks or less from the date of the homelessness decision to housing solution.</td>
<td>100%</td>
<td>90%</td>
<td>Mike Pursehouse</td>
<td>The FIRST team have continued to provide support to tenants which is proving effective in helping move on and demonstrates the early help approach well.</td>
</tr>
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![Chart](chart.png)
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| HE 1604: % of households contacting South Norfolk because of risk of losing their homes that are prevented from becoming homeless. | Mike Pursehouse      | 75.44%      | There were 57 cases in the Q2 with 14 unsuccessful cases. However, it is important to note that there has been a 26% reduction in cases in the first half of 17/18, compared to 16/17, due to prevention work of SNC. The cause of unsuccessful placements includes:  
  • Residents choosing social housing over private but being low priority, so not housed quickly.  
  • Difficulties with deposit or guarantor.  
  • Social issues preventing tenancy such as drugs, offending or alcohol.  
  One of the single biggest issues in preventing homeless cases is having a protocol in place with Housing Associations to understand when existing social tenants might be slipping into arrears. This will allow officers to better target tenants before they risk losing their tenancy, and would further reduce case numbers. The Homelessness Reduction act, coming into force in 18/19 will place greater obligation on partners to inform us of threats to tenancy. We will look to put protocols in place with our Housing Associations during this year. |

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<tr>
<td>Quarter 2 Result / Indicator</td>
<td>Mike Pursehouse</td>
<td>75%</td>
<td>90%</td>
</tr>
<tr>
<td>Chart</td>
<td>79%</td>
<td>75%</td>
<td>90%</td>
</tr>
<tr>
<td>Quarter Result</td>
<td>Target</td>
<td>Intervention</td>
<td></td>
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<tr>
<td>HE 1605: % of those housed by SNC Housing which are still in there after a 6 month period.</td>
<td>100% 90%</td>
<td>Mike Pursehouse</td>
<td>We housed 152 people in Q2 through our Home Options service.</td>
<td><img src="chart1.png" alt="Chart" /></td>
</tr>
<tr>
<td>HE 1607a: £pounds paid in benefits to people in work</td>
<td>£910,033 Baseline</td>
<td>Mike Pursehouse</td>
<td>With the Q2 £910k figure added, the cumulative £pounds paid in benefits is now £1,946,520 for Q1 &amp; Q2.</td>
<td><img src="chart2.png" alt="Chart" /></td>
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<tr>
<td>HE 1607b: Number of people in work receiving benefits</td>
<td>1252</td>
<td>Baseline</td>
<td>Mike Pursehous e</td>
<td>In Q2 there was a reduction of 66 cases since Q1 to 1252. Three of these were due to the person becoming pension age and 63 of these were either due to increased hours/income through better employment, lost employment or moving out of the district.</td>
</tr>
<tr>
<td>BV 009: % of Council Tax collected.</td>
<td>55.50%</td>
<td>98.50%</td>
<td>Simon Bessey</td>
<td>The number of customers paying by Direct Debit continues to increase which provides certainty of collection - however the numbers migrating from 10 to 12 monthly instalments also continues to grow. However with a fully staffed team now providing pro-active intervention along with new software now in place with the collections agents we anticipate that this figure will improve throughout Q3 &amp; Q4.</td>
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<td>HE 1606: Number of days taken to process new claims for Housing Benefit/Council Tax Benefit.</td>
<td>8.0 days</td>
<td>Mike Pursehouse</td>
<td>Due to changed working processes we have been able to demonstrate an improvement in performance in this area of the work which averaged 12.5 days in Q1 and was ‘Red’. Our improvements are despite the trend continuing of new claims for working age people being more complex to process. New Claims cases have decreased 10% compared to last year and Changes in Circumstances have increased by 16%.</td>
<td><img src="image1.png" alt="Graph" /></td>
</tr>
<tr>
<td>HE 1607: Number of families and residents helped to achieve positive outcomes through our Help Hub service.</td>
<td>984</td>
<td>Mike Pursehouse</td>
<td>The help hub has supported 537 people in Q2 which is 984 cumulative so far for this year. The Q2 figure comprised 232 children and 305 adults.</td>
<td><img src="image2.png" alt="Graph" /></td>
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<td><strong>HE 1608:</strong> Number of residents who are assisted to access support within their community to meet low level need.</td>
<td>Latest Data</td>
<td>Mike Pursehouse</td>
<td>We have had unprecedented levels of activity in quarter 2 with 4,726 people seen. We saw 275 in Q1. We now have a full team of connectors covering the whole district. The connectors attended 8 flu clinic sessions in September, focused on older people, the team worked with other agencies to provide advice and support to 1,119 patients as they attended the clinic. The connectors have seen 106 people through social prescribing and the remaining people through engagement events such as South Norfolk on Show (and our Tour), Police street surgeries and mobile libraries.</td>
</tr>
<tr>
<td>Quarter 2 Result / Indicator</td>
<td>Year End Target 2017/18</td>
<td>5001</td>
<td>1,200 (This is a cumulative figure for the whole year)</td>
</tr>
<tr>
<td><strong>LI 323:</strong> Increase the number of vulnerable people supported to maintain independence in their own homes, with support from interventions.</td>
<td>Latest Data</td>
<td>Sam Cayford</td>
<td>Performance is on schedule and we supported 475 in Q2 with a running total of 927 since April this year. Changes to the handyperson service and the creation of a triage team may influence the performance in the next quarter.</td>
</tr>
<tr>
<td>927</td>
<td>2,000 (This is a cumulative figure for the whole year)</td>
<td></td>
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<tr>
<td>LI 263: Number of missed bins for all waste per 100,000 collections</td>
<td>39.52 🙁 30</td>
<td>Simon Hawken</td>
<td>Missed bin numbers unfortunately increased above target in Q2. This was due to a combination of: a) a number of vehicle breakdowns including a 32-tonne truck catching fire which could only be replaced by a 26-tonne truck while being repaired which impacted capacity; b) Additional garden waste tonnage due to the weather which meant more tip visits needed leading to unfinished rounds; and c) Fewer agency staff being available to cover holidays &amp; sickness. Going forward these issues are being addressed through: • Return of the 32-tonne truck and imminent arrival of 3 new trucks. • Now the garden waste disposal contract has been awarded there will be an exercise to optimise the garden waste rounds over the winter months. • Alongside the proactive management of sickness, we are looking to train some staff to be able to take on the role of driver / loaders and working with the agencies to try &amp; increase the number of workers available.</td>
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<tr>
<td>LI 262: Cost of waste collection per household</td>
<td>£30.75</td>
<td>£37</td>
<td>Simon Hawken</td>
<td>The cost of waste collection for Q2 is £30.75 which is a reduction in cost on last year and under the target of £37.</td>
</tr>
<tr>
<td>NI 192a: % Municipal waste recycled, reused and composted</td>
<td>46.00%</td>
<td>44.00%</td>
<td>Bob Wade</td>
<td>This is a good result as it is still better than the Q2 target of 44.5%</td>
</tr>
</tbody>
</table>

![Chart 1](image1.png)

![Chart 2](image2.png)
APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

<table>
<thead>
<tr>
<th>Measure Description</th>
<th>Latest Data</th>
<th>Operational Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>LI 302: % of household applications determined within 8 weeks or in extension of time</td>
<td>Quarter 2 Result / Indicator: 98.70% Year End Target 2017/18: 90.00%</td>
<td>Helen Mellors This relates to 228 applications, 204 (89%) of which were determined in the statutory time period and 21 of which were determined in an extension of time. The average number of days for determining householder applications is 42 days.</td>
</tr>
<tr>
<td>MI 1037: % of household applications determined within six weeks</td>
<td>Quarter 2 Result / Indicator: 53.00% Year End Target 2017/18: 60.0%</td>
<td>Helen Mellors This relates to 228 applications of which 120 were determined in less than 6 weeks. The average number of days for determining householder applications is 42 days. While the average number of days is slightly above the operational target of 40 days the number of applications determined is significantly higher than previous quarters. 63% of applications were determined in less than 6 weeks in September and the average number of days was 36.</td>
</tr>
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</table>
APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

<table>
<thead>
<tr>
<th>Measure Description</th>
<th>Latest Data</th>
<th>Year End Target 2017/18</th>
<th>Measure Owner</th>
<th>Operational Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>MI 1038: % of major applications determined within 13 weeks or in extension of time</td>
<td>100.00%</td>
<td>90.00%</td>
<td>Helen Mellors</td>
<td>This relates to 19 applications, 9 of which (47%) were determined in the statutory time period and 10 of which were determined in an extension of time.</td>
</tr>
<tr>
<td>PL 1602: % of Community Action Fund (CAF) spent.</td>
<td>100%</td>
<td>90%</td>
<td>Mike Pursehouse</td>
<td>As mentioned in the Q1 report (where the result was 0% zero, the CAF panel met in Q2 with 10 applications approved. The projects were based across the district with the whole CAF fund being spent on this first round. Therefore, there will be no autumn panel. The year-end target for this measure has therefore been achieved.</td>
</tr>
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</table>

![Chart](chart.png)
## APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

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<thead>
<tr>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td><strong>LI 350: Number of Affordable homes delivered in the third year of the three year affordable homes target</strong></td>
<td>283</td>
<td>Keith Mitchell</td>
<td>By the end of Q2, 128 homes had been completed through negotiation with developers. As several dozen more are well-advanced, the annual target of 300 will be achieved before the end of Q3.</td>
</tr>
<tr>
<td><strong>PL 1604: % percentage of people applying to register to vote online as opposed to on paper.</strong></td>
<td>85.06%</td>
<td>Julia Tovee-Galey</td>
<td>There has been a reduction in online applications compared to paper applications by 10%, due to combination of the time of year, people moving and not able to access online and new properties not available on the online system.</td>
</tr>
</tbody>
</table>

### Chart 1: Cumulative Result vs Cumulative Target
- **Cumulative Result**
- **Cumulative Target**
- **Intervention**

### Chart 2: Quarter Result
- **Quarter Result**

---

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# APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures

Key:
- Green circle = Met or exceeded target
- Yellow circle = Within acceptable tolerance of target
- Red circle = Stretch target not reached
- Triangular = The measure is being ‘baselined’ in order to determine the target

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<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>BV012a: Working days lost per FTE due to short term sickness absence.</td>
<td>1.53 (Green circle)</td>
<td>4.5 days (This is a cumulative total per FTE figure for the whole year)</td>
<td>Peter Catchpole</td>
</tr>
</tbody>
</table>

![Chart](image-url)

- Cumulative Result
- Target
- Intervention
**APPENDIX 1 - Quarter 2 performance report 2017-18: Strategic Measures**

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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>LI 759: % of our top 10 service requests made via online web-forms.</td>
<td>62.42%</td>
<td>50.00%</td>
<td>Simon Smith</td>
<td>The use of digital transactions continues and is set to improve further when the new website designs go live in the next few weeks. Improved signposting and marketing will help to drive even more traffic to this channel. Making our forms mobile friendly and reviewing the customer experience on these to improve the process will have a positive impact. With more services and customer accounts being added in the future we are progressing transformation to digital well.</td>
</tr>
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![Chart](chart.png)
### Strategic Risk Register

#### Directorate Code Risk/Opportunity Owner Commentary (including outcomes / benefits that may be gained) 2017/18 Business Plan Activity Required/outstanding actions to support risk mitigation

<table>
<thead>
<tr>
<th>Directorate</th>
<th>Code</th>
<th>Risk/Opportunity</th>
<th>Owner</th>
<th>Commentary (including outcomes / benefits that may be gained)</th>
<th>2017/18 Business Plan Activity</th>
<th>Required/outstanding actions to support risk mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Growth &amp; Business</strong></td>
<td>S1</td>
<td>Failure to encourage business growth at Norwich Research Park Enterprise Zone (EZ) means the Council cannot recoup its investment in the site. Parts of the NRP not covered by EZ status fail to attract new growth. Failure of landowners to deliver the required infrastructure on their respective area of the EZ. Opportunity to take forward a JV building on the NRP EZ with NA LEP is not taken forward.</td>
<td>Director of Growth &amp; Business Development</td>
<td>On 23 May 2016, Cabinet agreed to invest £12.54m to support infrastructure development at Norwich Research Park Enterprise Zone. The accompanying report highlighted the opportunity to:  - invest, unlock and enable new development  - generate significant economic and financial benefits  - accelerate business growth and attraction of inward investment  - generate business rates income Also highlighted were several key risk areas, most notably that the development of the site does not occur, which could ultimately result in the Council’s investment not</td>
<td>• E3 - Delivery of the Greater Norwich City Deal which is centred around the economic growth of the Park and greater levels of commercialisation of NRP research  • Delivery of economic growth within a key growth sector  • Securing new inward investment into the District  • Delivering the Cambridge Norwich Tech Corridor which the NRP EZ forms part of.</td>
<td>• Signing of funding agreement with the New Anglia LEP to determine the terms of allocation of business rates generated in the Enterprise Zone  • Signing of contracts with development partners to establish the terms (including delivery timelines and risk sharing) of the SNC investment and subsequent development and compliance with State Aid Regulations  • Assessment of most advantageous borrowing options for South Norfolk Council at point of borrowing  • Signing ToR for the ‘Operational Partnership Group’ with Enterprise Zone Partners to establish how delivery on the site will be monitored and the marketing</td>
</tr>
<tr>
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</tr>
<tr>
<td>Planning &amp; Environment</td>
<td>S2</td>
<td>Delivery of the Long Stratton Bypass is delayed</td>
<td>Planning Policy Manager / Director of Planning &amp; Environment</td>
<td>The Greater Norwich City Deal facilitates a commitment to pool CIL to help fund infrastructure across the Greater Norwich area, with the Long Stratton Bypass</td>
<td>E3 – Infrastructure Delivery Programme</td>
<td>Plans to attract new businesses.</td>
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<td></td>
<td></td>
<td></td>
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<td>being recouped.</td>
<td></td>
<td>• Delivery of a marketing strategy to maximise opportunities to secure new inward investment to generate the required level of income to repay the loan.</td>
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<td>In September 2016, the Memorandum of Understanding with DCLG was signed, demonstrating the Council’s commitment to supporting the Enterprise Zone. The Grant Agreement for £3m with Bullen Development was signed on the 11 July 2017.</td>
<td></td>
<td>• Financial modelling and policy which takes account of the acceptable proportion and best estimates of those EZ based organisations paying reduced business rates.</td>
</tr>
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<td>If the subsequent funding award is required (£4.3m), this will be conditioned with ensuring that the freehold of Zone 3 land is also owned by Bullens for the purposes of developing out the EZ.</td>
<td></td>
<td>• For new/expanding non-EZ located businesses at NRP, SNC to offer business rate incentives on a case by case basis in line with 'Pot B' arrangements.</td>
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<td>• Develop and agree terms of the JV package for Zone 4 building.</td>
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<td>• It is anticipated that the two planning applications will be lodged in December 2017, with public pre-application consultation having taken place in July and October.</td>
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<thead>
<tr>
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<td>identified as a key project to be delivered. A multi-year commitment to borrow £10m from the City Deals loan pot to help part-fund the bypass was agreed by the Greater Norwich Growth Board in 2016. Additional internal and external funding streams are also being investigated, and the developers/landowners will need to contribute a &quot;substantive&quot; amount of the funding required. The Long Stratton AAP was adopted in May 2016, which adds certainty to the project happening. A bid has been made by Norfolk CC to the Government for about £3m of funding to deliver the Hempnall Crossroads improvements. A decision is expected on this within the next month.</td>
<td>2017 (run by the developers, not the Council) • The potential use of a Compulsory Purchase Order to ensure delivery remains an option if progress is insufficiently rapid, and the early-stage preparatory work is picking up pace. Considerable internal resources would need to be deployed if a formal CPO process is required for the Long Stratton bypass and 1800 houses. A significant sum has been earmarked from the Council's reserves should additional costs be necessary to fund such work. • The Greater Norwich Growth Programme for 2016/17 (with a multi-year approach to the Long Stratton bypass borrowing) was approved by the Greater Norwich Growth Board in Q2 2015/16; this ensures greater certainty that the funding is available to help the delivery of the Long Stratton bypass.</td>
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<tr>
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| Planning & Environment | S3   | Shortage of 5-year land supply in the Norwich Policy Area results in uncoordinated development across South Norfolk, with pressure to approve housing applications on unallocated sites and housing planning appeals more likely to succeed when applications are refused on land supply grounds | Planning Policy Manager      | The Norwich Policy Area (NPA) housing land supply figure for the end of 2015/16 is 4.70 years, partly due to the Greater Norwich councils accepting that there has been persistent under-delivery of housing in the NPA over recent years. This means that the Council remains under pressure to approve residential development proposals on unallocated sites.  

The current (Sep-Nov) Government consultation on housing needs assessment proposes that those areas with joint plans should be able to assess Objectively Assessment Need across the whole of the Plan area. This might help mitigate some of the 5-year land supply risk in E2 – Adopted Local Plan Delivery and Implementation  

- There is a desire not to undermine the spatial approach of the Joint Core Strategy by allowing uncoordinated development on unallocated sites, but planning applications for housing in the NPA need to be considered with regard to the fact that there is not currently a 5-year supply of land (i.e. given greater weight)  

- All Greater Norwich Local Plan documents allocating sites have been adopted, but approving planning applications on unallocated sites in the NPA will help add to the housing land supply. Whilst each application must (and will) be considered on its own merits, refusals on such cases need to be |
<table>
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<tr>
<td></td>
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<td></td>
<td>Greater Norwich, but there are uncertainties</td>
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<td>particularly robust</td>
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<td>• Officers are continuing to work with housebuilders and landowners and undertaking research to identify the reasons why some sites are not progressing as quickly as desirable (a county-wide piece of work is investigating this), and explore whether any assistance (through working with the LEP and exploring the use of the Local Infrastructure Fund to help deliver infrastructure, for example) could help speed up delivery of such sites</td>
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<td></td>
<td>• The Greater Norwich Growth Board asked, at their meeting in March 2017, for officers to explore the potential for a new Local Delivery Vehicle (LDV) to assist in the more rapid delivery of infrastructure and housing in Greater Norwich, and this work has progressed</td>
<td></td>
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<td>• Officers will continue to</td>
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<td>ensure all decisions are robust and have defendable reasons for refusal</td>
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<td></td>
<td>• Officers are drafting an instruction to an experienced barrister to seek legal advice on various aspects of the current housing land supply situation</td>
</tr>
</tbody>
</table>

**How we will deliver:** Customer focussed, Can do and collaborative, Business-like, efficient and entrepreneurial - Moving Forward Together

**Chief Executive**  
**S4**  
The Council is unable to deliver priority services as revenue funding falls short of required income

**Accountancy Manager**
The Council's Medium Term Financial Strategy (MTFS) was updated in February and shows a balanced budget for 2017/18, 2018/19 and 2019/20. Further work is required to identify measures to balance the budget from 2020/21 onwards. The plan contains two major risks, around income.
Firstly, it includes reduced

**BAU Finance:**

- Budget Setting, Monitoring and Reporting and Business Cases
- BAU: Development of the Leisure Portfolios offering: Ensure residents

**Required/outstanding actions to support risk mitigation**
- Balanced budget beyond 2019/20
- Delivery of Long Stratton Leisure Centre Enhancements (2017/18)
- Completion of Phase 2 Poringland development (2017/18)
- Completion of Maple Park development (2017/18)
- Delivery of the Enterprise Zone
- Implementation of increases
<table>
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<td>revenue income from the New Homes Bonus (NHB) of £807K in the revenue budget of £807,000 in 2017/18 compared to the expectation. The reduction up to 2020/21 years is £1.6 million worse than anticipated in the previous MTFS. The actual level of NHB received is dependent on continued delivery of planned housing growth in the District.</td>
<td>have access to high quality leisure services across the district and increase our leisure offering by identifying additional business opportunities, including the resurrection of the New Diss Leisure Centre project &amp; or temporary dry side unit option</td>
<td>to fees and charges (2017/18)</td>
</tr>
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<td>Secondly, the plan assumes additional efficiencies and income from meeting the 10% challenge and commercialisation, mainly from property development and the leisure service and also from increases to fees and charges.</td>
<td>ACTIVITY: Property investment and development activities to maximise income generation to the Council</td>
<td>• Delivery of further property developments (2018/19)</td>
</tr>
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<td>Should the additional income not be achieved, then the funding gap will increase. However, the financial position to the end of May 2017 indicates a positive variance and that the 10% challenge is currently being met.</td>
<td>ACTIVITY: Supporting growth: Support growth and local communities by growing and offering services which meet business needs of others</td>
<td></td>
</tr>
<tr>
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<tr>
<td>Growth &amp; Business Development</td>
<td>S5</td>
<td>Council assets are not managed effectively and do not support service delivery</td>
<td>Director of Growth &amp; Business Development</td>
<td>The Council's key operational assets need to be maintained adequately to support effective service delivery. These assets can assist the Council in improving services offered and increasing income generation. The repairs and maintenance of these assets is managed by the services responsible. Technical advice is provided by the Facilities and Technical Services Manager.</td>
<td>J2 - Ketteringham Depot expansion and upgrade</td>
<td>• Depot enhancements to address H &amp; S issues are in progress. The one public estate funded feasibility study for a joint site with NCC has concluded that this is not financially viable. (2017/18) • Delivery of Long Stratton Leisure Centre enhancements (2017/18) • Rationalise floor space at SN House for rental income – Lease of Daniels Room completed in April 2017</td>
</tr>
<tr>
<td>Growth &amp; Business Development</td>
<td>S6</td>
<td>Property Development activities are not successful and income generation is not realised</td>
<td>Director of Growth &amp; Business Development</td>
<td>• Through the Council’s wholly owned property development company, Big Sky Developments Ltd, the Council is seeking to utilise its own land to develop a range of residential and property assets. Creation and</td>
<td>E5 - Maximise income generation and opportunities of surplus or underutilised land and property assets. Creation and</td>
<td>• Maximise opportunities by seeking to gain planning consent for development • Respond to market conditions, supply and demand • Big Sky Property Dev: Up to</td>
</tr>
<tr>
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<td>commercial property. The commercial units will be retained within the Council to enable revenue income to be generated from rents. While the majority of the residential homes will be sold to generate profit, it is envisaged that a number will be retained in the Council’s wholly owned property rental company, Big Sky Property Management Ltd. These homes will generate a rental income and the company’s profits will be returned to the Council’s revenue income.</td>
<td>effective management of a broad commercial property investment portfolio (capital investment) to support economic growth</td>
<td>20 residential units from development sites let for income generation within 12 months’ time. (11 now transferred 8 to be transferred to BSPM by end of Q3 2017/18, 3 further properties at Maple Park to be transferred once construction complete by end Q4 2017/18)</td>
</tr>
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<td>• An Expression of interest has been submitted to the Homes and Communities Agency on behalf of all Norfolk and Suffolk authorities in relation to starter home delivery.</td>
<td></td>
<td>• Rosebery Park phase 2 residential build completed</td>
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<td>• land assets in the “call for sites“ phase of the local plan submitted Q2 2016</td>
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<td>• Feasibility appraisal of 5 potential development sites completed.</td>
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<td>• Search for additional sites for development in progress (2017/18)</td>
</tr>
</tbody>
</table>
## Appendix 3: Analysis of Major Variances on Service Areas – April to September 2017

<table>
<thead>
<tr>
<th>Service Area</th>
<th>Direct Budget</th>
<th>Direct Net Expenditure/ (Income)</th>
<th>Variance</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Rates</td>
<td>(1,503,684)</td>
<td>(1,827,998)</td>
<td>324,314</td>
<td>There is a positive variance on South Norfolk Council’s share of NNDR (business rates) income. This is owing to a higher than expected share of NNDR income for SNC, but a lower than budgeted levy owing to higher than anticipated costs of successful appeals and further amendment of assumptions in the light of actual appeal decisions.</td>
</tr>
<tr>
<td>Revenues &amp; Benefits Team</td>
<td>220,267</td>
<td>166,067</td>
<td>54,200</td>
<td>There is a positive variance as there has been additional income received from the DWP relating to the roll-out of Universal Credit.</td>
</tr>
<tr>
<td>Community Connectors</td>
<td>(44,213)</td>
<td>(100,006)</td>
<td>55,793</td>
<td>All Community Connectors have now been recruited, however the time taken to recruit at the start of the year has led to a £13k positive variance on staffing budgets. The grants programme is scheduled to make awards in the second half of the year. The positive variance also includes £32k relating to grant funding for social prescribing.</td>
</tr>
<tr>
<td>Youth Advisory Board</td>
<td>44,945</td>
<td>12,642</td>
<td>32,303</td>
<td>The grants programme is scheduled to make more awards in the second half of the year which is expected to reduce the current positive variance of £32k.</td>
</tr>
</tbody>
</table>
There is presently a negative variance on salaries however staffing has now been realigned which will reduce this variance over time. Casual use of leisure is always lowest in the second quarter over the summer and it is expected that income in the second half of the year will be higher than in the first half of the year. There is a positive variance of £39k on Kids Camp mainly due to the new pricing strategy agreed by Cabinet in February.

<table>
<thead>
<tr>
<th></th>
<th>(£)</th>
<th>(£)</th>
<th>(£)</th>
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<tbody>
<tr>
<td>Wymondham Leisure Centre</td>
<td>(60,362)</td>
<td>(12,630)</td>
<td>(58,012)</td>
<td>There is presently a negative variance on salaries however staffing has now been realigned which will reduce this variance over time. Casual use of leisure is always lowest in the second quarter over the summer and it is expected that income in the second half of the year will be higher than in the first half of the year. There is a positive variance of £39k on Kids Camp mainly due to the new pricing strategy agreed by Cabinet in February.</td>
</tr>
<tr>
<td>Homelessness</td>
<td>(82,163)</td>
<td>(140,768)</td>
<td>58,605</td>
<td>The homelessness support and prevention grant income was secured after budget setting and this has resulted in a £58k positive variance.</td>
</tr>
<tr>
<td>Housing Options Team</td>
<td>210,858</td>
<td>175,458</td>
<td>35,400</td>
<td>Positive variance due to vacant posts (2.3 FTE)</td>
</tr>
<tr>
<td>Care and Repair</td>
<td>(83,050)</td>
<td>(29,507)</td>
<td>(53,543)</td>
<td>The negative variance due to income being less than budget due to a Care &amp; Repair officer (1 FTE) vacancy. Following the February Revenue budget setting North Norfolk Council have taken this service in-house.</td>
</tr>
<tr>
<td>Director of Community Services</td>
<td>81,761</td>
<td>36,811</td>
<td>44,950</td>
<td>There is positive variance due to the vacant director post which was partly covered for 3 months and not fully recruited until October.</td>
</tr>
<tr>
<td>Building Control</td>
<td>(30,405)</td>
<td>(174,084)</td>
<td>107,102</td>
<td>Fee earning income has increased during the second quarter to bring the half yearly position almost back inline with the target (LI 1013). Traditionally income levels drop over the winter months but it is anticipated that this year the price increases which came into effect at the beginning of October will have a positive impact. Several staff vacancies (5 FTE) have remained unfilled throughout the year leading to a £132k positive</td>
</tr>
</tbody>
</table>
variance on staff-related costs. Recruitment processes are currently underway to fill these positions.

<table>
<thead>
<tr>
<th>Department</th>
<th>Budget</th>
<th>Actual</th>
<th>Variance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technical Operations (IT)</td>
<td>711,513</td>
<td>661,776</td>
<td>49,737</td>
</tr>
<tr>
<td>Staff costs being under budget (£25k) due to vacancies being unfilled to date. In addition there is an underspend on Equipment (£16k) which is expected to be spent in the second half of the year.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Economic Development</td>
<td>143,587</td>
<td>198,116</td>
<td>(54,529)</td>
</tr>
<tr>
<td>Negative variance caused by an overspend against budget on Consultancy during the period. This has been to fund an Interim Head of Department (£23k), an additional consultant (£7.5k), and contributions to the Norwich and Cambridge Tech Corridor project (£27.5k) and MIPIM's (£11k).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Environmental Quality and Community Asset Teams</td>
<td>248,868</td>
<td>197,872</td>
<td>50,996</td>
</tr>
<tr>
<td>There are currently 2.5FTE vacancies in the community assets/environmental quality teams which account for the underspend. The teams are currently undergoing review and this will determine the level of resourcing needed in future.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recycling Strategy</td>
<td>75,663</td>
<td>45,718</td>
<td>29,945</td>
</tr>
<tr>
<td>This area has a positive variance year to date owing to a staffing vacancy (£13k), which has contributed to lower than budgeted advertising related expenditure of £17k. It is anticipated that marketing expenditure will increase once the staffing vacancy is filled.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development Management</td>
<td>(67,675)</td>
<td>(10,225)</td>
<td>(57,450)</td>
</tr>
<tr>
<td>Planning Fee income to the end of September 2017 is running £10k ahead of the comparable figure in September 2016. There is nevertheless a negative budget variance of £89k on planning income, which reflects the fact that the anticipated fees for the two major Long Stratton planning applications have yet to be received. The September figures are affected by</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
the fact that an uplift of £100k was added to the 2017/18 budget, which assumed that the Government's 20% fee increase would be in place by September 2017. Members will be aware this increase has been delayed and will not be in place until the New Year. The shortfall in income is partially offset by staffing vacancies (£24k).

<table>
<thead>
<tr>
<th>Domestic, Garden and Bulky Waste Collections</th>
<th>(543,579)</th>
<th>(365,936)</th>
<th>(177,643)</th>
</tr>
</thead>
<tbody>
<tr>
<td>An increase in gate and contamination fees from the MRF have seen disposal costs of recyclable waste compare adversely against budget. Recycling credits for domestic waste are also down meaning a negative variance of £69k for disposal costs for the first six months of the year and this is only partly offset by increased recycling credits for garden waste. A substantial increase in garden waste tonnage due to the warmer weather which resulted in more visits to the disposal facility being required, which led to incomplete rounds and more missed bins. This also had a consequential impact on the amount of overtime and agency working at the depot, though this has been partly offset by vacancies which have recently been filled. Staff-related costs are overall comparing adversely against budget by £78k.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Commercial Waste Collection</th>
<th>(36,262)</th>
<th>(67,099)</th>
<th>30,026</th>
</tr>
</thead>
<tbody>
<tr>
<td>The income achieved at the end of Quarter 2 is around 25% higher than at the same point last year. There are also vacancies (3 FTE's) which have resulted in an overall positive variance.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix 4: Analysis of Major Variances on Capital Programme

<table>
<thead>
<tr>
<th>Capital Projects</th>
<th>Budget to 30/09/17</th>
<th>Expenditure to 30/09/17</th>
<th>Variance</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Vehicle Replacements</td>
<td>390,042</td>
<td>28,659</td>
<td>361,383</td>
<td>Expenditure to date comprises wholly of the purchase of the vehicle tracking system. Three refuse vehicles totalling £510k have been ordered with delivery expected before the end of the year. Options around the purchase of a street sweeper are currently being investigated.</td>
</tr>
<tr>
<td>Aids &amp; Adaptations &amp; DFGs</td>
<td>449,455</td>
<td>282,828</td>
<td>166,627</td>
<td>Expenditure to the end of September is relatively low compared to the budget to date. The housing team are confident that a sufficient level of expenditure will be incurred to qualify for the full allocation of funding for the financing of DFGs in 2017/18 (£781k).</td>
</tr>
<tr>
<td>Wheeled Bin Replacements</td>
<td>114,574</td>
<td>33,820</td>
<td>80,754</td>
<td>At the end of the quarter there is an outstanding commitment of £35k for bins that have been ordered, but not yet delivered. For the remainder of the year stock will be monitored and orders for bins will continue on the basis of need. It is anticipated that expenditure will be similar to that in 2016/17 (approx. £140k), which would result in a positive variance of £89k by the end of the year.</td>
</tr>
<tr>
<td>Toilet Refurbishments</td>
<td>319,788</td>
<td>1,047</td>
<td>318,741</td>
<td>Discussions are ongoing with Parish Councils, which will influence the direction of the individual toilet projects across the District.</td>
</tr>
</tbody>
</table>
Cabinet
30 October 2017
Agenda Item 6

Treasury Management Quarter 2 2017/18

Report of the Accountancy Manager
Cabinet Member: Barry Stone – Finance and Resources

CONTACT
Matthew Fernandez-Graham 01508 533915
mgraham@s-norfolk.gov.uk
1. Introduction

1.1 The report reviews the treasury management activity during the first six months of the financial year 2017/18 and reports on the prudential indicators as required by CIPFA’s Treasury Management Code of Practice.

1.2 Investments totalled £39.809 million as at 30 September 2017, including loans and equity in the Council’s wholly owned companies. From this total, £27.589 million represents external cash investments in a range of counterparties (Banks and Money Market Funds).

1.3 Interest received on external cash investments during the financial year is forecast to be around £120,000 which is £8,000 below the budget of £128,000. This reflects the lower rates available on cash investments following the Bank of England’s decision to reduce the base rate to 0.25% from 4 August 2016. The Council has also been reducing investment duration in order to ensure it maintains sufficient liquidity in its investment portfolio to fund the major capital investments in the capital programme.

2. Economic Background and Interest Rates

2.1 In a speech on September 19th, Bank of England Governor, Mark Carney, stated that any increases in interest rates in the coming months will be “gradual” and “limited”. He later went on to say that “Some withdrawal of monetary stimulus is likely to be appropriate over the coming months” to aid in returning inflation to its target rate of 2 percent. This came on the back of the Bank’s Monetary Policy Committee indicating that the UK’s first interest rate rise in a decade was edging closer, despite continued uncertainty around Brexit. This contradicted the views of most economists who had previously been expecting the Bank to wait until late 2018 / early 2019 before raising rates.

2.2 The Council’s Treasury Management advisors, Capita Asset Services, have updated their forecast for interest rates following the Governor’s speech and their latest forecast (along with a comparison to the Capital Economics’ independent forecast) is shown below. The forecast will be updated following the next quarterly meeting of the Bank of England’s monetary policy committee in November 2017.
3. The Council’s Overall Borrowing Requirement

3.1 The Council’s underlying need to borrow is called the Capital Financing Requirement (CFR). This figure is a gauge of the Council’s debt position. Based on the audited accounts, as at 31 March 2017, the Council had a CFR of zero. This is because no borrowing took place, due to the Council choosing to use its internal cash reserves as a more cost effective means of financing its capital programme.
3.2 The Council’s estimated CFR is shown below, and represents a key prudential indicator.

<table>
<thead>
<tr>
<th>CFR (£m)</th>
<th>31 March 2016 Actual</th>
<th>31 March 2017 Actual</th>
<th>31 March 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closing Balance</td>
<td>£0</td>
<td>£0</td>
<td>£13,144,000</td>
</tr>
</tbody>
</table>

3.3 The Council is currently estimated to have a Capital Financing Requirement of £13,144,000 for 2017/18, due to the size of the capital programme. This can partly be funded by reducing the Council’s cash investments. The Council’s Treasury Management Strategy, agreed by Full Council on 21 February 2017 states that, apart from the Enterprise Zone, the CFR for 2017/18 would be financed from internal borrowing in the first instance. It is anticipated that some external borrowing will be required in relation to the Enterprise Zone later in 2017/18. The size and timing of this external borrowing will depend on the speed at which work on the Enterprise Zone proceeds.

4. Investment Activity

4.1 The CLG’s Investment Guidance requires local authorities to prioritise security and liquidity over yield. The graph below shows the position on investments as at 30 September 2017 compared to the position for the previous 2 quarters. Following a sharp reduction on the interest rate paid by Barclays from 31st August 2017, the Council has been investing more of its cash in Money Market Funds which offer a better rate of return.
For new cash investments this year, the Council has invested for up to one year in order to ensure it has sufficient liquidity to finance the capital programme, taking the advice of its treasury management advisors at the time. Details of these investments (excluding those placed in money market and call accounts) are provided below:

<table>
<thead>
<tr>
<th></th>
<th>£000s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short term</td>
<td></td>
</tr>
<tr>
<td>Long term</td>
<td></td>
</tr>
<tr>
<td>Equity</td>
<td></td>
</tr>
<tr>
<td>Investments</td>
<td></td>
</tr>
<tr>
<td>Money market</td>
<td></td>
</tr>
<tr>
<td>Funds</td>
<td></td>
</tr>
<tr>
<td>Bank Accounts</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
</tr>
<tr>
<td>Balance on</td>
<td></td>
</tr>
<tr>
<td>01/04/17</td>
<td>£0</td>
</tr>
<tr>
<td>30/06/17</td>
<td>£0</td>
</tr>
<tr>
<td>30/09/17</td>
<td>£0</td>
</tr>
</tbody>
</table>
### Investment

<table>
<thead>
<tr>
<th>Month</th>
<th>Counterparty</th>
<th>Amount £m</th>
<th>Length of Investment</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>July</td>
<td>Goldman Sachs</td>
<td>2.0</td>
<td>95 days’ notice</td>
<td>0.46%</td>
</tr>
<tr>
<td>August</td>
<td>Goldman Sachs</td>
<td>3.5</td>
<td>185 days’ notice</td>
<td>0.60%</td>
</tr>
<tr>
<td>August</td>
<td>Goldman Sachs</td>
<td>2.0</td>
<td>1 year’s notice</td>
<td>0.885%</td>
</tr>
</tbody>
</table>

The Council has also made use of Enhanced Money Market Funds that have been able to provide slightly higher returns than call accounts.

#### 4.3 Security of capital remains the Council’s main investment objective. Ensuring liquidity is increasingly important in order to have sufficient funds to finance the capital programme and delay external borrowing (with the associated interest costs). The Council has placed some investments on a longer term basis with those institutions whose credit rating is at least the same or above the Council’s minimum risk rating criteria. The maximum length of an investment is 2 years, though there are few deals beyond 1 year currently available from suitable counterparties. The Council’s strategy itself is not risk free, as comparatively high-yielding investments have been maturing in 2017/18 and are having to be reinvested at lower interest rates due to prevailing market conditions. It is important that the Council keeps a balanced portfolio in terms of risk, rates and liquidity.

#### 4.4 The Council’s budgeted cash investment income for the year has been set at £128,000. The cash balances invested, representing the Council’s reserves and working balances were £27.589 million as at 30 September 2017 and interest earned is forecast to be around £120,000 which is £8,000 below budget, due to lower interest rates in the market and the need to maintain liquidity to fund the capital programme. This figure would be £62k less than the £182k received in 2016/17, due to the use of reserves for the capital programme and lower interest rates.

#### 4.5 As at 31 March 2017, there were outstanding loans made to Big Sky Developments Ltd of £5.38 million and loans of £545,000 to Big Sky Property Management Ltd (BSPM). In addition, there were equity investments of £4.725 million in the Council’s wholly owned companies. If the money used for loans and investments had been invested in a bank, then the return would have been around £90,000 at the interest rates prevailing for 2016/17. Between April and September 2017 there have been additional loans of £852,000 made to Big Sky Property Management and equity investments of £568,000 in Big Sky Ventures Limited in line with the agreed capital programme, as detailed in the Finance, Performance and Risks report elsewhere on this agenda.
5. Compliance with Prudential Indicators

5.1 The Council approved a set of Prudential Indicators for 2017/18, in February 2017, as part of the Council’s Treasury Management Strategy.

5.2 Under the Council’s Constitution, the Full Council approves the Treasury Management Strategy and therefore any deviation or breach must be reported to Full Council. In practice, all breaches are also reported to Cabinet prior to Full Council. The prudential indicators can be found in Appendix A. There were no breaches of the indicators between April and September.

5.3 CIPFA is currently consulting on updating the Treasury Management Code of Practice and it is anticipated that there will be revisions to the Code and to Prudential Indicators that will impact in 2018/19.

6. Investment Properties

6.1 The Council has a portfolio of Investment Properties worth around £7.2 million. The majority of these properties are rented out, so the return obtained on these properties is as important as if the Council had invested the same amount in the Treasury Strategy. However, under CIPFA’s code they are recognised as Capital Assets in the Balance Sheet.

6.2 The average rate of return for the total investment portfolio is forecast to be 5.7% gross for the year, calculated on the property value as at 1/4/17, which now includes Crafton House. This is a significantly better rate of return than if the same value had been invested with the Council’s counterparties.

7. Conclusion

7.1 Investment balances have increased from £34.3 million at 1 April 2017 to £39.8 million at 30 September 2017, but this includes £12.2 million in loans and equity in the Council’s companies. Cash balances are £27.6 million as at 30 September 2017. These balances are expected to reduce as the capital programme progresses in the second half of the year.
7.2 Interest earned on cash investments is forecast to be £120,000 for the year, which is £8,000 below the budget of £128,000, and would be £62,000 less than the £182,000 received in 2016/17.

8. Recommendation

8.1 Cabinet is recommended to request that Council:

a) Note the treasury activity between April and September and that it complies with the agreed strategy.

b) Approve the 2017/18 prudential indicators for the first six months of the year.
Appendix A: Prudential Indicators

Capital Financing Requirement
Estimates of the Council’s cumulative maximum borrowing requirement for 2017/18 to 2019/20 are shown in the table below:

<table>
<thead>
<tr>
<th></th>
<th>31/03/2017 Actual £000s</th>
<th>31/03/2018 Estimate £000s</th>
<th>31/03/2019 Estimate £000s</th>
<th>31/03/2020 Estimate £000s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capital Financing Requirement</td>
<td>0</td>
<td>13,144</td>
<td>30,558</td>
<td>13,920</td>
</tr>
<tr>
<td>Less: Existing Profile of Borrowing</td>
<td>0</td>
<td>(6,647)</td>
<td>(18,893)</td>
<td>(5,000)</td>
</tr>
<tr>
<td>Less: Other Long Term Liabilities</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cumulative Maximum Borrowing Requirement</td>
<td>0</td>
<td>6,497</td>
<td>11,665</td>
<td>8,920</td>
</tr>
</tbody>
</table>

In the Prudential Code (November 2009), it states \(^1\) ‘Where there is a significant difference between the net and gross borrowing position the risks and benefits associated with this strategy should be clearly stated in the annual strategy.’

Balances and Reserves
Details of the Council’s level of Balances and Reserves for 2016/17 and future years are as follows:

<table>
<thead>
<tr>
<th></th>
<th>31/03/2017 Actual £000s</th>
<th>31/03/2018 Estimate £000s</th>
<th>31/03/2019 Estimate £000s</th>
<th>31/03/2020 Estimate £000s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Balances and Usable Reserves</td>
<td>21,516</td>
<td>18,726</td>
<td>15,340</td>
<td>12,653</td>
</tr>
</tbody>
</table>

These have risen from the estimates in the Treasury Management Strategy due to the predicted revenue surplus for 2017/18.

\(^1\) Prudential Code, November 2009, page 4, paragraph E19
Prudential Indicator Compliance

(a) Authorised Limit and Operational Boundary for External Debt

- The Local Government Act 2003 requires the Council to set an Affordable Borrowing Limit, irrespective of their indebted status. This is a statutory limit which should not be breached.
- The Council’s Affordable Borrowing Limit is set at £13,000,000 for 2017/18 (an increase from £6,500,000 in 2016/17 to reflect the EZ and property investment).
- The Operational Boundary is based on the same estimates as the Authorised Limit but reflects the most likely, prudent but not worst case scenario without the additional headroom included within the Authorised Limit.
- The Operational Boundary for borrowing for 2017/18 is set at £6,647,000 (an increase from £4,500,000 in 2016/17 to reflect further borrowing planned for the EZ and property investment).

(b) Upper Limits for Fixed Interest Rate Exposure and Variable Interest Rate Exposure

- These indicators allow the Council to manage the extent to which it is exposed to changes in interest rates.
- The upper limit for variable rate exposure allows for the use of variable rate debt to offset exposure to changes in short-term rates on our portfolio of investments.

<table>
<thead>
<tr>
<th>Limits for 2017/18 £000s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upper Limit for Fixed Interest Rate Exposure on Debt</td>
</tr>
<tr>
<td>Upper Limit for Fixed Interest Rate Exposure on Investments</td>
</tr>
<tr>
<td>Net Upper Limit for Fixed Rate Exposure</td>
</tr>
<tr>
<td>Compliance with Limits:</td>
</tr>
<tr>
<td>Upper Limit for Variable Interest Rate Exposure on Debt</td>
</tr>
<tr>
<td>Upper Limit for Variable Interest Rate Exposure on Investments</td>
</tr>
</tbody>
</table>
(c) Maturity Structure of Fixed Rate Borrowing

- This indicator is to limit large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates.

<table>
<thead>
<tr>
<th>Maturity Structure of Fixed Rate Borrowing</th>
<th>Upper Limit %</th>
<th>Lower Limit %</th>
<th>Actual Fixed Rate Borrowing as at 30/09/17</th>
<th>% Fixed Rate Borrowing as at 30/09/17</th>
<th>Compliance with Set Limits?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 12 months</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
</tr>
<tr>
<td>12 months and within 24 months</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
</tr>
<tr>
<td>24 months and within 5 years</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
</tr>
<tr>
<td>5 years and above</td>
<td>100</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
</tr>
</tbody>
</table>

(d) Total principal sums invested for periods longer than 364 days

- This indicator allows the Council to manage the risk inherent in investments longer than 364 days.
- The limit for 2017/18 is set at £15 million.
South Norfolk Council Response to the Babergh and Mid Suffolk Joint Local Plan – Regulation 18 Consultation (August 2017)

Report of the Planning Policy Manager  
Cabinet Member: John Fuller, The Economy and External Affairs

CONTACT  
Adam Nicholls (01508) 533809  
anicholls@s-norfolk.gov.uk
1. Introduction

1.1 Regulation 18 consultation on the Babergh and Mid Suffolk Joint Local Plan is taking place from 21 August to 10 November 2017 (see http://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-consultation-document/). The purpose of this report is to present the South Norfolk Council response to the consultation for Cabinet agreement.

1.2 The new Babergh and Mid Suffolk Joint Local Plan will provide the growth strategy for the two districts, setting out what and where development will take place up to 2036. It will set out a vision for the area and will include policies and land allocations. When adopted it will replace the existing local planning policies for both Babergh and Mid Suffolk.

2. Background

2.1 This report presents the South Norfolk Council response to the Babergh and Mid Suffolk Joint Local Plan Regulation 18 consultation.

2.2 The purpose of the consultation is to identify the issues, put forward options and in some instances, indicate an initial preference of policy direction for the new Joint Local Plan for Babergh and Mid Suffolk. The new plan will take approximately two more years to complete and adoption is currently planned for Spring 2019.

2.3 As a neighbouring authority of Mid Suffolk, South Norfolk Council has a duty to work with Babergh and Mid Suffolk District Councils to identify and plan for key strategic issues through the Duty to Co-operate. Those councils which run along the Norfolk/Suffolk border meet every two months or so to discuss strategic planning issues, and so officers are discussing key issues (such as traffic in and around Diss) regularly.
3. Current Position/Findings

3.1 Officer comments have been sought from a number of different teams across the Council (Housing Enabling, Environmental Quality, Community Assets, Community Protection, Economic Development and Development Management) to ensure that a comprehensive response is made.

3.2 A weblink to the consultation documents was also sent to those Members who represent wards adjacent to the Mid Suffolk District Council boundary so that any comments received could be incorporated into the response.

4. Proposals

4.1 South Norfolk Council is broadly supportive of the new Babergh and Mid Suffolk Joint Local Plan and the Councils continued commitment to engage with South Norfolk Council on strategic planning issues through the Duty to Co-operate is welcomed.

4.2 The Plan is proposed to be set out in three parts – strategic, delivery and places and will cover four priority areas – housing, economy, environment and healthy communities and infrastructure. The South Norfolk Council response to the Plan is included as Appendix 1. The Council’s response does not make comment on all areas of the plan, only where it is felt that there is a direct impact on South Norfolk or where particular issues/comments have been noted. As this is only an Issues and Options consultation there are no detailed policies to comment on at this stage so in many instances only broad support or guidance can be offered.

4.3 Comments include:
- Broad support for a vision based upon the four key priority areas of housing, the economy, the environment and healthy communities and infrastructure;
- General support for the identified objectives. Comments are made regarding the importance of the A140 as a strategic transport connection to Norwich and onwards to the A47;
- Support for working together with Babergh and Mid Suffolk District Councils through the Duty to Co-operate and general agreement with the key strategic issues identified. Comment made regarding the potential cross boundary impact of strategic growth, particularly at Diss and Harleston and the need to recognise the emerging Diss and District Neighbourhood
Plan which covers parishes in both Mid Suffolk and South Norfolk. Traffic levels in Diss are identified as a matter of particular concern;

- Support the intention for both Babergh and Mid Suffolk to accommodate their Objectively Assessed Housing Need. Options for spatial distribution which focus on the Ipswich fringe or urban areas/market towns are favoured as the most sustainable alternatives with recognition that the delivery of the right infrastructure in the right places is key to support growth;
- Some caution expressed regarding the option which proposes a minimum 1,500 dwelling new settlement as this level of development would be unlikely to be sufficient to bring adequate supporting infrastructure and it would also not have the degree of self-containment (i.e. a balance of homes, jobs and services) that would be expected from such a settlement;
- Broad support for an approach that would allow an element of flexibility for small scale infill development in rural areas but some concern expressed regarding the approach for infill in hamlets and the designation of development boundaries for settlements above a 10-dwelling threshold if they are adjacent to or fronting onto an existing public highway. There is a social sustainability argument that can be made for additional homes in small settlements, but there is also a need to ensure that these proposals result in sustainable development overall and a link to the accessibility of nearby services and facilities is suggested to minimise the most isolated settlements seeing growth; and
- Support for the policy direction that supports economic growth and the continued vitality and viability of town centres/district centres.

5. Risks and implications arising

5.1 There will be no direct impact on crime and disorder in South Norfolk, nor any negative impact on disadvantaged groups, although Babergh and Mid Suffolk District Councils will need to prepare their own Equalities Impact Assessment to accompany the submission of the Local Plan.

5.2 The Babergh and Mid Suffolk Local Plan will have direct environmental implications on South Norfolk. This will arise through additional traffic on the A143, A140 and, especially, Diss and Harleston, and the related pressures this growth will have on the environment of the River Waveney and infrastructure. The two councils have prepared a Sustainability Appraisal to support the Issues and Options Local Plan, but it will be important for South Norfolk Council to continue working with Babergh and Mid Suffolk (along with the Diss & District Neighbourhood Plan team) to ensure that environmental implications of growth are considered, and mitigated. Clearly the reverse also applies in connection with the emerging Greater Norwich Local Plan.
6. Other options (if necessary)

6.1 Cabinet could choose to modify the consultation response and send an altered response to Babergh and Mid Suffolk District Councils, but officers are satisfied that the current response has covered all the main point of relevance to South Norfolk Council.

7. Recommendation

7.1 Cabinet is therefore recommended to:
   i) Agree the South Norfolk Council response to the Regulation 18 consultation on the Babergh and Mid Suffolk Joint Local Plan (Appendix 1)
   ii) Delegate authority to the Director of Planning and the Environment, in consultation with the Cabinet Member for External Affairs to agree any changes to the response and submit formally to Babergh and Mid Suffolk District Councils.

Appendix 1 – South Norfolk Council response to the Regulation 18 consultation on the Babergh and Mid Suffolk Joint Local Plan
South Norfolk Council response to the Babergh and Mid Suffolk Joint Local Plan Regulation 18 Consultation
Consultation Period 21 August - 10 November 2017

Vision and objectives:

1. **What do you think the vision should be?**
   South Norfolk Council believe that the vision should reflect the unique qualities of Mid Suffolk and Babergh, put into the context of the key priority areas for the respective councils. The vision should focus on the delivery of sustainable growth including necessary infrastructure investment, whilst recognising the broadly rural nature and character of the districts. South Norfolk would be broadly supportive of a vision based upon the four key priority areas of housing, the economy, the environment and healthy communities and infrastructure.

2. **Do you agree with the identified objectives? Please explain reasoning**
   South Norfolk Council are generally supportive of the identified objectives: housing, the economy, environment and healthy communities and infrastructure. Would like to see recognition of the importance of the A140 as a strategic transport connection to Norwich, with onward links to the A47.

   The third bullet point sentence under ‘Healthy Communities and Infrastructure’ does not read properly e.g. ‘to for’

3. **Are there any other objectives which should be added?**
   No additional objectives identified.

4. **What should be a priority across the district area? (please state which district)**
   South Norfolk Council considers that the top priority across both districts should be meeting objectively assessed housing need and providing employment opportunities and adequate infrastructure to support growth.

5. **What is most important for your town or village?**
   Although they are outside the district, Harleston and, in particular, Diss, are very important market towns in South Norfolk, whose hinterlands extend well into Mid Suffolk. Enabling these towns to thrive is therefore vital to both councils, and the impact of growth in these towns on Mid Suffolk, and vice versa, needs to be considered in detail. Traffic and congestion in Diss is already a significant local issue that needs further work to investigate and mitigate.

**Duty to Cooperate:**

5a *Do you agree or disagree with the identified key issues for compliance with the Duty-to Cooperate for the Babergh and Mid Suffolk Joint Local Plan? Please explain why*
General agreement with the identified issues. It will be important for Mid Suffolk to engage with South Norfolk Council regarding the potential cross boundary impacts of strategic growth, particularly at Diss and Harleston. The emerging Diss and District Neighbourhood Plan which covers parishes in both the South Norfolk and Mid Suffolk authority areas will be an important consideration.

6. **Are there any other key planning issues which need to be considered in accordance with the Duty-to-Cooperate? Please explain why.**
No other issues to be considered.

**Housing Requirement:**

7. **Do you agree with the proposed approach set out under Option HR1? If not, please explain why and what alternatives you propose**
South Norfolk Council support the approach set out under HR1 meaning that both Babergh and Mid Suffolk Councils are intending to provide for their own Objectively Assessed Housing Need.

8. **When allocating sites what scale of contingency should be applied? Please explain why**
South Norfolk Council would support Option HD1 and would suggest that the option of applying a contingency is the most robust option. In terms of a scale of contingency, our suggestion would be **10%**.

9. **Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery?**
A full viability assessment will be key to ensure that sites are capable of being delivered and early and on-going dialogue with landowners/developers from the earliest stage of site promotion should be encouraged. Viability will also indicate whether the site can make the necessary contribution to the delivery of affordable housing. Consideration of factors that can slow delivery such as complicated site ownership, site constraints and servicing requirements should be reflected when assessing and comparing sites.

The districts should ensure that a wide range of site sizes spread across a range of settlements are allocated to ensure competition in the market and opportunities for a range of builders, including small-medium operators.

Consideration could be given to encouraging planning applications to come forward on key housing sites at an early stage. Encourage developers to commit to a delivery plan/timetable for larger sites as ensuring the timely provision of infrastructure can speed up delivery.

Consideration could be given to a range of different housing delivery vehicles and products, such as local authority led development companies, starter homes, and self/custom build.
10. **What factors or priorities should be set as triggers for reserve sites to come forward?**
   Ongoing monitoring of housing delivery should identify emerging problems. If, after exploring the issues thoroughly, there are no easy or quick solutions to delivering certain key sites (i.e. they are falling behind their delivery trajectory by two years or more), this could be the trigger for some reserve sites to come forward.

**Review of the Settlement Hierarchy**

11. **Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative.**
   The Council supports Option SET2 to rank settlements in the hierarchy based upon a weighted scoring system recognising relationships to higher order settlements, key services and supporting services because settlements should not be considered in isolation. A settlement itself may have no services or facilities but it may be closely related and even form continuous development with a settlement that has a wide range of services and facilities. Improving the social sustainability of some small settlements through limited new housing should be a consideration.

12. **Do you agree with the proposed joint settlement hierarchy? If no, please provide further details as to how the hierarchy should be amended.**
   The Council has no specific comments on the settlement hierarchy. However, there may there be a benefit in distinguishing which settlements are in Babergh and which in Mid Suffolk in the table.

**Spatial Distribution:**

13. **Which option(s) for housing spatial distribution do you think is the best? Please explain your answer.**
   South Norfolk Council would support either option BHD 1 or 2, focusing growth on the Ipswich fringe area or in urban areas and market towns, as these look to be the most sustainable options in terms of growth. It is considered that caution should be employed about a new settlement focussed option as the minimum number of 1,500 homes would be unlikely to bring adequate supporting infrastructure. If it is intended that a new settlement could go beyond this scale of growth after 2036, this should be stated.

14. **Are there other realistic broad distribution options which should be considered? Please explain your answer.**
   No comment.

15. **If a new settlement was to be planned in the area, where should it be located? Please explain your answer**
Housing Types & Affordable Housing:

16. **Should the Joint Local Plan include a requirement for new dwellings to meet the Nationally Described Space Standards?**
This will need to be considered as part of the Local Plan viability assessment, but would be sensible, given the difficulties that can be caused by small homes with inadequate storage space.

17. **Do you have any views on the proposed approach towards self-build and custom build dwellings?**
In relation to self-build and custom build the consultation document states that ‘The purpose of the self-build register is to ‘match’ those looking to build a property with sites that would potentially be suitable for them to do so and to ensure that planning permission is granted to meet demand…’. South Norfolk Council consider that the use of the word ‘match’ is wrong, as although this is an option it is not a purpose of the legislation or government guidance. This could lead to unwanted complications if incorporated in to the Local Plan.

The consultation document also states that it is intended that the Joint Local Plan will provide clarity over what constitutes self-build and custom-build dwellings. Is this a good idea? Perhaps it depends on the wording but this might lead to problems by being over-restrictive or more generous than intended.

18. **What should the Council’s approach to Starter Homes be?**
The Council’s should wait for further government guidance to be released (the revised NPPF) before clarifying their approach to Starter Homes.

19. **Should the Councils be prioritising the provision of any particular types of homes?**
The provision of particular types of homes should be evidenced by the findings of the published Strategic Housing Market Assessment.

20. **Are there any other types of housing that should be planned for/required?**
The current Government consultation *Planning for the Right Homes in the Right Places* seeks views on this (see its Question 10); the Councils should consider what the revised NPPF says about this.

21. **How can the Councils promote/facilitate development of homes for private rent?**
No comment.

22. **In relation to affordable housing, do you consider the requirement should be set at a percentage other than the current 35%? If so, please provide reasons.**
South Norfolk Council has no evidence to suggest that the affordable housing percentage should be set at anything other than the current 35%.

23. To what extent should affordable housing be (or not be) prioritised over provision of other infrastructure where viability is an issue? The Local Plan should seek to provide the required level of affordable housing on all housing schemes. A viability assessment should be undertaken for sites allocated in the plan. The extent to which affordable housing should (or should not) be prioritised over provision of other infrastructure where viability is an issue would be a matter for negotiation at the planning application stage and will depend upon the circumstances of individual sites.

24. In relation to affordable housing, should there be any preference for housing to accommodate key workers? No comment.

25. If Option RE2 is supported, what maximum percentage of market housing should be acceptable? The starting position should be for these sites to deliver 100% affordable housing. The decision to allow an element of market housing should only be taken in exceptional circumstances and this would need to be justified based on a viability assessment. If allowed, the element of market housing should be subsidiary to the affordable housing in terms of floorspace and numbers.

Rural growth and development:

26. Which option for the policy approach to rural growth do you think is most appropriate? South Norfolk Council would support Option RG2 for allocations with flexibility for small scale infill as would agree that this approach provides greater certainty whilst maintaining flexibility on small scale sites. It can also help boost the social sustainability of some small settlements.

27. Are there any other approaches to distributing development in rural areas that we should consider? No comment.

28. Do you support the approach proposed for hamlets? If not please explain? The Council would be reasonably supportive of Option HG2 to support appropriate infill in hamlets – there can be social sustainability benefits of some limited housing growth in some small settlements – but it need to be considered how the cumulative impact of proposals will be measured. Should there be some measure of how close the hamlet is to a higher order settlement with services and facilities to ensure sustainability and avoid isolated development in the countryside?
Accommodation Needs of Gypsies and Travellers:

29. What should the Councils’ approach to provision of negotiated stopping places be?
   No comment, apart from the fact that, in the absence of transit sites, it may be sensible to provide them.

30. Please submit details of any sites, or extensions to existing sites, which you consider are suitable for allocation as Gypsy and Traveller sites or Travelling Show people sites
   No comment.

31. Should the Joint Local Plan include a policy which identifies areas where moorings would be acceptable in principle?
   In principle, this would seem to be a good idea as a continuation of the policy approach in the 2006 Babergh Local Plan. It is recognised that Mid Suffolk does not have locations where houseboats are moored and therefore no need is identified.

32. If so, are there any specific locations where additional moorings could be located?
   No comment.

Economic Needs:

33. Should we continue to identify existing employment areas and protect land and premises in these areas from redevelopment/conversion to other uses unless marketing evidence demonstrates there is no demand for employment use?
   Yes, the Plan should continue to protect existing employment land and premises, although this should particularly focus on key strategic employment sites.

34. If we continue to protect existing employment areas, which areas should be identified?
   No comment.

35. Are there any existing employment areas that could be reallocated to other uses?
   No comment.

36. Should we identify areas where non-B class uses, such as car showrooms, tyre and exhaust centres and building material stores, can be located?
   The suitability of these uses in certain areas could be identified in the Plan, maybe as part of certain employment allocations. For example, South Norfolk Council has made provision for other employment uses that are not identified as main town centre uses in the NPPF such as car showrooms and petrol filling stations to locate on the Longwater Employment area at Costessey.
37. **Should there be a policy that allows a wider range of uses than just B class on all employment sites or selected employment sites?**

There may be an opportunity to allow other employment type uses or related ancillary uses on some or all employment allocations, although this needs to be carefully defined and monitored and should be assessed on a site-by-site basis.

38. **Should we allocate more than enough land to meet the forecast needs to enable more choice in the market and give flexibility to changing circumstances?**

South Norfolk Council consider that it is important to allocate sufficient employment land to meet and probably slightly exceed forecast needs to ensure choice and flexibility in the market. However, this is a careful balancing act to ensure that the plan does not significantly over allocate employment land which has no likelihood of coming forward as this could increase pressure for this land to be released for residential development at a later date.

39. **Should we make specific employment provisions for small and medium sized enterprises? If so, how and where?**

A variety of employment sites should be allocated to meet the needs of small and medium sized enterprises as well as larger businesses. Policies in the plan should also allow for small and medium size enterprises to come forward on unallocated sites in certain circumstances to provide sustainable employment opportunities for rural communities.

40. **If we expand, or allocate additional employment land where should these be?**

No comment.

41. **What approach should we take to supporting new business formation across the Districts?**

A positive and flexible approach should be taken towards supporting business formation across the districts and this should be facilitated through the policies in the Plan. The plan should support sustainable economic growth and be flexible enough to meet the needs of both new business start-ups and existing businesses that are looking to expand.

**Town Centres and Retail:**

42. **Do you consider that any of the sites put forward as part of the Call for Sites should be allocated for retail or commercial leisure use? Please state why**

No comment.

43. **Are there any other sites that should be considered for retail or commercial leisure use?**

No comment.
44. If you consider allocations for retail development should come forward as mixed use, please provide details
No comment.

45. Do you agree with the proposed Town Centre boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages? If not, please explain why
No comment.

46. Do you agree with the approach to not define Primary Shopping Area boundaries within settlements other than the three main towns? If not, please explain why.
The approach is agreed with.

47. Do you agree with the approach to maintain and increase retail provision within the District Centres? If not, please explain why.
The approach is agreed with.

48. Do you agree with the proposed thresholds relating to the mix of uses within Primary Shopping Frontage? If not, please explain why.
It will be important that any proposed thresholds relating to the mix of uses within the Primary Shopping Frontage can be justified and evidenced and that the thresholds contain an element of flexibility. If they are defined too tightly it could lead to instances where obvious town centre uses such as an optician’s shop would be contrary to policy (because they tip the percentage over a threshold), instead potentially leaving an empty shop unit. A minimum threshold of 75-80% in Sudbury looks quite high but it is appreciated that this seems to be a recommendation of the Town Centres and Retail Study.

49. Do you agree with the proposal to require an impact assessment for all edge of centre and out of centre retail proposals that are 400sqm gross floorspace or more? If not, please explain why
It will be important that any threshold for an impact assessment for edge of centre and out of centre retail proposals can be justified and evidenced. The approach taken in the consultation document is supported as the 400 m² gross threshold seems to be recommended in the Retail and Town Centres study based upon the size and nature of existing shops.

50. The Councils propose to protect A1 – A5 uses in the Core Villages and Hinterland Villages, and in local centres within towns. Do you consider this to be the correct approach?
The approach is supported.

**Biodiversity:**

51. Do you have views on the Option BIO 1 and/or BIO 2?
The Council agrees with the Councils’ preference for BIO2 to ensure biodiversity is supported and enhanced across all parts of the Districts.

**Climate Change:**

52. How should the local plan consider the impacts of renewable technologies? What types of effects should be assessed within the policy criteria?
No comment.

53. Do you support the Council’s initial preference to include water efficiency measures in new build? If no, please explain why?
No comment.

54. Are there any other additional environmental standards Babergh and Mid Suffolk should be requiring? If so, please provide details and reasons why
No comment.

**Landscape, Heritage & Design:**

55. Are there any other approaches that the Joint Local Plan could take to protect the landscape?
No comment.

56. Should additional protection be given to areas which form part of a landscape project area but which aren’t designated?
No comment.

57. How can the Joint Local Plan make the most of the heritage assets?
No comment.

58. What level of protection should be given to identified non-designated assets? Are there any specific situations in which the balance should favour or not favour protection of identified non-designated assets?
No comment.

59. Should a more flexible approach toward climate change objectives be adopted where this would assist in protecting a heritage asset?
No comment.

60. Is there any aspect of design that priority should be given to?
No comment

61. Is there any aspect of design that should be introduced to the Council’s policies?
No comment
62. Is there an area of design related to past development that you consider needs to be addressed in future development?
No comment

Infrastructure:

63. Which option so you consider most appropriate? Please explain why?
South Norfolk Council would support the preference for Option INF2 as having a strategic infrastructure policy is considered to be the best way to manage infrastructure provision and to allow contributions to be directed where they are most needed.

64. What do you consider the key infrastructure issues in your community?
Whilst it is recognised that it is outside the two districts, Diss provides important services (education, employment, railway station, health, retail, leisure etc) to northern parts of Mid Suffolk (such as Brome, Eye and Palgrave). Traffic congestion within Diss is a significant issue, particularly on Victoria Road/Park Lane, and South Norfolk Council and Norfolk County Council are undertaking work to better understand the nature of the difficulties, with a view to identifying potential solutions. The Diss and District Neighbourhood Plan will also be doing similar work.

It will be important for Mid Suffolk and Suffolk County Councils to continue to work closely with South Norfolk and Norfolk County Councils to seek to improve traffic issues within Diss, as well as on the main A140 and A143 roads. Similarly, the “Norwich in 90″ railway campaign is an important initiative that all the councils along the route are supportive of.

65. What infrastructure issues do you consider to be a priority for the future?
South Norfolk Council considers that the infrastructure categories highlighted in the consultation document (e.g. education, health, transport, water and drainage, energy, communications and leisure and green infrastructure) are all key future priorities to support growth. In terms of links to South Norfolk, key priorities would be cross boundary infrastructure provision, particularly in the vicinity of Diss and Harleston and any necessary improvements to the A140. Significant growth (at least 1800 homes) is allocated to Long Stratton, and the planning applications to provide these homes and the Long Stratton Bypass are expected to be submitted by November 2017. Given the cross-border links between settlements in the Waveney valley, and Diss in particular, adequate and appropriate social infrastructure such as healthcare provision and schooling are key concerns of South Norfolk Council.

66. What infrastructure do you think would be needed to support the growth scenarios?
See answer to question 65.
67. What comments do you have on the proposed strategic approach to infrastructure delivery?
No comment.

68. Should a separate policy be developed to manage provision of education and healthcare?
No comment.

Healthy Communities:

69. Should the strategy of the Plan be focussed on addressing deprivation?
As Babergh and Mid Suffolk do not generally seem to experience significant issues relating to deprivation it is not felt that the strategy of the plan necessarily needs to be specifically focussed on addressing deprivation. Both the vision and objectives and the policies in the plan should by their nature address the deprivation issues that have been identified without the need for a specific focus.

70. Are there any specific approaches that should be applied to address deprivation?
See answer to question 69.

71. Are there any other circumstances and/or provision under which open space, sports facilities or community facilities should be required and/or protected?
No comment.

72. Through the Plan should any other areas of Local Green Space be identified and protected?
No comment.

73. Are there any specific facilities that should be included in the definition of community facilities?
No comment, agree with list of facilities in the consultation document.

Functional Clusters:

74. Do you consider the approach to identifying functional clusters appropriate for Babergh and Mid Suffolk? If not, please explain what would be your preferred approach?
This approach is agreed with.

Settlement Boundaries:

75. Do you consider the proposed new settlement boundaries to be appropriate? (Please explain your answer)
See answer to Question 77.
76. Are there any other settlements that should be given new settlement boundaries? (please explain your answer)
No comment.

77. Is the threshold (10 well related dwellings) for identifying settlement boundaries appropriate?
South Norfolk Council has some limited concerns over the approach to designating boundaries for settlements above a threshold of 10 dwellings. Although the option does mention the need for the settlement to be adjacent to or fronting onto an existing public highway, there does not seem to be any other obvious link to sustainability. Adding homes can boost the social sustainability of small settlements, however. It is felt that there needs to be additional criteria used to assess the suitability of the settlement to have a development boundary such as accessibility to a range of services and facilities to avoid development in the countryside which is too isolated from services. Where there are good links to nearby settlements with services, perhaps identified through functional clusters (Q74), this could be highlighted.

Potential Land for Development

78. Do you consider the sites identified to be appropriate for allocation or inclusion within the settlement boundary? (please explain why and quote the settlement and site reference numbers ie SS0001)
No comment.

79. Are there any other sites/areas, which would be appropriate for allocation? (If yes, please provide further information and complete a site submission form).
No comment.
Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk

Report of the Planning Policy Manager
Cabinet Member: John Fuller, Economy and External Affairs

CONTACT
Adam Nicholls
anicholls@s-norfolk.gov.uk
1. Introduction

1.1 All nine Norfolk Local Authorities (the seven districts, the Broads Authority and the County Council) fully recognise the importance of health and healthy living, and the link to planning, but engagement between the various health bodies and partners has not always been as easy and full as would be ideal.

1.2 Partly as a result, the councils have worked closely with various Health bodies (such as Clinical Commissioning Groups) to prepare an Engagement Protocol to codify the steps that each of the partners will take in trying to recognise how the pressures for growth will most appropriately be managed by Health and Planning bodies. The Protocol is now being formally approved by each of the nine Local Authorities, and various Health bodies.

1.3 South Norfolk Council has a very strong commitment to improving healthcare and healthy living for its residents, with it being a cross-departmental matter – Planning, Leisure Services, Early Help, Licensing, Food & Safety and Housing to name but some are heavily involved in initiatives to reduce obesity, increase physical activity, improve mental health and help people to live longer, healthier and independent lives.

2. Background

2.1 A healthy environment and a healthy population should go hand-in-hand. Improving public health was one of the foundation stones for the art and science of town planning in England, following Victorian-era epidemics of cholera in London and other towns and cities.

2.2 For most of the twentieth century, however, town planning and health diverged somewhat, with planning often paying insufficient attention to public health matters, and vice versa. More recently, the importance of green infrastructure, walking, cycling to healthy living has, however, come back to the fore nationally as policy-makers have looked for ways of reducing the costs of ill-health to the public purse, as well as making new developments attractive and welcoming places to live. The Joint Core Strategy and other South Norfolk Local Plan documents require this, for example through delivering the Greater Norwich Green Infrastructure Strategy.
2.3 Everyone will be aware of the current and future budgetary pressures in the health and social care sectors, caused by (amongst other factors) an ageing population, and increased rates of obesity, diabetes and other conditions. Town planning clearly has a major role to play in trying to keep people as fit and active as possible through the design and layout of new developments, and facilitating walking, cycling and sporting and leisure activities. It also enables the creation and protection of high quality built and natural environments. The current GP recruitment and retention problems in Norfolk (and elsewhere) are a further difficult issue, albeit one the town planning system can do relatively little to remedy directly.

2.4 There have been a number of national re-organisations of health services in recent years, including the setting up (and then dissolving) of Primary Care Trusts (PCTs), the creation of Clinical Commissioning Groups (CCGs) and county councils taking on a major role in Public Health. There was strong engagement with PCTs during the development of the JCS, but one consequence of the reorganisation is that there has been some loss of corporate healthcare memory about Local Plans and committed development, with some healthcare individuals unaware of major development proposals, even though they have been publicly known of for years.

2.5 As a result of this, through discussions between planners and healthcare bodies, it was decided that a piece of work was needed to draw the threads of healthcare and planning together, so that there are “no surprises” to either side, both in terms of the planning for future housing growth, and the expected healthcare demands (for care beds, for example). This obviously requires both planners and health bodies to engage regularly with each other, consulting on (and responding to) significant new reports, documents, planning applications and Local Plans.

2.6 Work and discussion on the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk has been ongoing since 2015. Throughout this period support has come from several quarters, including each of the Norfolk CCGs.
3. Current position

3.1 The Protocol seeks to explain the relationship of land-use planning to public health and NHS services, giving an overview of the planning system to health professionals and an overview of health service commissioning structures to land-use planners. There are mutual commitments to discuss development-related pressures on healthcare services and opportunities for high-quality place-making to enable people to make healthier lifestyle choices. The Protocol also includes NHS England giving the opportunity for monitoring how population change from housing developments could have an impact on all aspects of acute and primary care services across Norfolk.

3.2 The Protocol seeks for health professionals and town planners to work together to secure land or funding for new healthcare facilities required as a result of new development. To assist with such negotiations, appended to the Protocol is population modelling data to give an indication of future healthcare requirements for Norfolk. Based on each CCG area, projections are given on future demand for acute hospital beds, intermediate care beds, and the numbers of General Practitioners required. The population increases are modelled on low, medium and high scenarios for house-building rates, reflecting the uncertainty as to how economic conditions might affect the house-building industry in coming years. The second appendix to the Protocol is a Health Planning Checklist that consists of six place-making themes. Use of the Checklist is not mandatory, it is simply made available to all practitioners as a convenient method to appraise development schemes in advance of, or at the point of, making a planning application.

3.3 In agreeing the Protocol, it is hoped that the local planning authorities will undertake their commitments as part of agreeing the Norfolk Strategic Framework (NSF). From a health services perspective, it is hoped that each Norfolk CCG will agree to the protocol via its Governing Body, and NHS England will give senior officer support to the Norfolk Protocol.

3.4 South Norfolk’s residents will benefit from the implementation of the Protocol through the better and more effective engagement between the LAs and healthcare bodies. This is likely to involve, for example, the “future-proofing” new dwellings to enable residents to live in their houses longer, promoting “active” travel (i.e. more walking and cycling) and reduced social isolation. This will also help reduce the burden on primary frontline healthcare services enabling better access to services for those who need them.
3.5 It is an important principle for both South Norfolk Council’s Early Help prevention agenda, and also health and social care partners through the Sustainability and Transformation Plan/Partnership, that all partners retain a strong focus upon place and community. This is to ensure that residents’ long and short term problems are identified and addressed adequately (often in a multi-agency fashion), and as a fundamental means to try to support and develop sustainable and self-supporting communities. It is expected that this Protocol will help to retain a focus on the important role that district councils and planning can and do contribute towards this agenda. Sustainability of services is therefore not just a “buildings and premises” issue; in a broader sense, it will have many other linkages with SNC (e.g. Early Help).

3.6 The main commitments in the Protocol are as follows:

- For planning authorities to meet at least twice a year with the CCG colleagues to discuss and agree ways in which town planning and healthcare challenges can be met;
- For planning authorities to add CCG colleagues to the list of organisations consulted on major planning applications of 50 dwellings or more, and for care homes, housing for the elderly, student accommodation and loss of open space;
- With colleagues from Public Health Norfolk, to model how house-building projections could affect population change and the consequent demand on healthcare services; and
- To use the Healthy Planning Checklist, as deemed appropriate, to assess the quality of forthcoming development schemes.

3.7 The Protocol was discussed at the July 2017 meeting of the Norfolk Duty to Co-operate Member Forum, and agreed. Each Norfolk LA, CCG and NHS England are asked to agree the Protocol through Agreement 18 in the Norfolk Strategic Framework (which Cabinet discussed and commented on at their meeting on 9th October 2017). The main purpose of this paper is therefore to seek Cabinet’s formal agreement to the Protocol.

3.8 The Protocol was also discussed at the Council’s Regulation and Planning Policy Committee meeting on 18th October 2017. Members were very supportive of the Protocol, and emphasised the important role it will play in helping to ensure that planning, health and social care services work together as closely together as possible to ensure better outcomes for all. Members noted that the Protocol will be reviewed and updated on a regular basis, which will give the opportunity to make appropriate improvements.
4. Risks and implications arising

4.1 There are various legal duties in terms of healthcare that various bodies need to have regard to (such as the need for the County Council to prepare a Joint Strategic Needs Assessment). Whilst agreeing the Protocol will not, of itself, meet those duties, implementing the Undertakings will undoubtedly help in the effective discharge of these duties.

4.2 The financial impact of preparing the Protocol has been absorbed jointly by the councils and the health bodies. Effective implementation of the Undertakings would lead to significant cost savings through better planning (both town planning and health planning) and health outcomes.

4.3 There are very limited downside risks associated with the Protocol.

4.4 As a non-statutory document not making any new policy, there are no direct environmental implications, but better consideration of healthy living would be expected to lead to improvements to natural and built environments.

4.5 As a non-statutory document not making any new policy, there are no direct equalities implications, although clearly consideration of healthcare needs (including older people and people with disabilities) is significant.

4.6 Implementation of the Protocol is not expected to have any impact on crime and disorder.

5. Other options

5.1 Cabinet could choose not to agree the Protocol, but this is not recommended. Through monitoring, any shortcomings and/or improvements to the Protocol should be identified and implemented.
6. Recommendation

6.1 That Cabinet resolves to:

i) Formally adopt *Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk.*

**Appendix 1: Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk**
PLANNING IN HEALTH

AN ENGAGEMENT PROTOCOL BETWEEN LOCAL PLANNING AUTHORITIES, PUBLIC HEALTH AND HEALTH SECTOR ORGANISATIONS IN NORFOLK

MARCH 2017
This engagement protocol for planning in health in Norfolk has come about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view.¹

Pressures on health services are not a new phenomenon and there is always the requirement to do more with the resources available. The Norfolk Health Overview and Scrutiny Committee has made recommendations for improvement, including producing this protocol as a means to bring closer collaboration between the district and borough councils, the clinical commissioning groups, and public health in Norfolk.

Allied to this protocol is an assessment of future health care needs based on projections for population increases and house-building rates in Norfolk to enable informed decision-making about future health services commissioning. A healthy planning checklist has also been produced. This provides a practical tool to assist health sector organisations to participate in discussions with developers and planning authorities on major new development schemes, recognising that health sector organisations can bring an added influence to designing new developments that offer people the chance to choose a healthier lifestyle.

This protocol announces a renewed commitment to influence how the places in which we live can shape our lives and contribute to better health and wellbeing for all.

This protocol has been jointly prepared by Mike Burrell\textsuperscript{1}, Adam Banham\textsuperscript{2}, Sandra Davies\textsuperscript{3}, Dr Boaventura Rodrigues\textsuperscript{3} and Martin Seymour\textsuperscript{3}.

\textsuperscript{1}Norwich City Council, \textsuperscript{2}Broadland Council, \textsuperscript{3}Norfolk County Council.

The authors wish to thank members of the Public Health in Planning Task and Finish Group, including:

- Stephen Faulkner, Principal Planner, Community and Environmental Services, Norfolk County Council
- Kate de Vries, Project Coordinator, Community & Environmental Services, Norfolk County Council
- Hannah Grimes, Graduate Economic Development and Strategy Intern, Community and Environmental Services
- David Edwards, Specialty Registrar in Public Health, Specialty Training Programme, Health Education East of England

And

The London Healthy Urban Development Unit (HUDU) for permission to use of their ‘Planning Contribution Model’.
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Appendix 1 Projected Healthcare Requirements for Norfolk and Waveney 2036  
Appendix 2 A Healthy planning checklist for Norfolk
1 INTRODUCTION

1.1 BACKGROUND

The importance of planning decisions on the health and wellbeing of the population has been recognised since the 19th century when reforms brought about by town planners and public health practitioners resulted in improved health and life expectancy. Many of the major disease and health issues affecting the population in Britain today are impacted upon by the environment in which people live, work and play (Marmot, 2010). Spatial planning can have a major positive impact on improving the environment in which people live or, if the health impacts of developments are not adequately considered, adversely impact on people’s physical and mental health (Ross and Chang, 2012).

The National Planning Policy Framework requires local planning authorities to ensure that health and wellbeing and the health infrastructure are considered in Local and Neighbourhood Plans and in planning decision making. Public health organisations, health service organisations, commissioners and providers, and local communities should work effectively with local planning authorities in order to promote healthy communities and support appropriate health infrastructure.

1.2 AIM

To formulate an engagement protocol containing a documented process outlining the input and linking of relevant NHS organisations and public health agencies with local planning authorities for planning for housing growth and the health infrastructure required to serve that growth.

1.3 OBJECTIVES

Objectives for the engagement protocol are:

- To establish a working relationship and set a protocol for engagement between Norfolk local authority planning departments and Norfolk County Council (NCC) Public Health.
- To outline a process for obtaining robust and consistent public health information to inform plan making and planning decisions to support appropriate health infrastructure, with technical input from the NCC Public Health Intelligence Team.
To ensure that the principles of health and wellbeing are adequately considered in plan making and when evaluating and determining planning applications.

To establish a collective input from relevant NHS healthcare planning and commissioning organisations in the public health response to planning.

To agree a defined threshold indicator for Planners to contact the NCC Public Health team for input into planning.

### 1.4 ORGANISATIONS INVOLVED

The NHS underwent a major transformation in 2013 with the implementation of the Health and Social Care Act, 2012. Planning and purchasing healthcare services for local populations which had previously been performed by the primary care trusts is now largely performed by clinical commissioning groups (CCGs), led by clinicians. CCGs now control the majority of the NHS budget, though some highly specialist services and primary care are commissioned by NHS England. The Act also provided the legislation to create Public Health England (PHE), an executive agency of the Department of Health. PHE's role is advisory, and its aim is to protect and improve the nation's health and to address health inequalities. The Act further established local public health departments, which had formally been part of the NHS primary care trusts, within upper tier and unitary local authorities.

**NHS CLINICAL COMMISSIONING GROUPS:**

In Norfolk there are five local CCGs each with its own commissioning budget and responsibility for commissioning the majority of health services for the population in Norfolk and Waveney, including hospital treatment and community health care. The CCGs in Norfolk (see map 1, page 3) are:

- Great Yarmouth & Waveney CCG
- North Norfolk CCG
- Norwich CCG
- South Norfolk CCG
- West Norfolk CCG
In conjunction with NHS England, CCGs are required to produce Local Estates Strategies looking 5 years ahead, working with a wide range of local stakeholders. The strategies are intended to allow the NHS to rationalise its estates, maximise the use of facilities, deliver value for money and enhance patients’ experiences.

**NHS ENGLAND**

NHS England authorises the clinical commissioning groups and commissions a wide range of specialist NHS services, including prison health services, medical services for the armed forces, and primary care medical and dental services. This means that all GP practice contracts are between NHS England and the local GP provider.

There are two main types of funding associated with ownership of general practice premises:

- The practice is a tenant with a landlord (leased)
- The practice owns the premises (owner/occupier)

**NHS PROPERTY SERVICES:**

Following the Health and Social Care Act 2012, NHS Property Services was established as a private limited company owned by the Secretary of State for Health. NHS Property Services manages NHS property estates across England, with
responsibility for 4,000 buildings, worth over £3 billion. The buildings are used to provide patient care such as GP surgeries and community hospitals. Norfolk is covered by NHS Property Services Midlands and East regional team.

LOCAL AUTHORITY PUBLIC HEALTH, NORFOLK COUNTY COUNCIL:

Following the Health and Social Care Act 2012, the NHS no longer has a public health function. The majority of the public health workforce was transferred to Public Health England (PHE) at a national, regional or sub-regional (in PHE Centres) level, and to local authorities at a local level, with a complementary set of roles and responsibilities. In Norfolk, the Director of Public Health (DPH) and public health workforce is part of Norfolk County Council. The DPH is responsible for commissioning some mandatory and discretionary health services, for example sexual health, smoking cessation, drug and alcohol treatment, NHS Health Checks and health improvement services.

PUBLIC HEALTH ENGLAND, EAST OF ENGLAND

The role of PHE is to offer leadership and scientific and technical advice at all organisational levels. This involves working with local authorities and the NHS to reduce rates of infection and provide evidence to establish effective strategies and inform commissioning. The regional centre for PHE includes the Anglia area, with Norfolk, Suffolk and Cambridgeshire.
Figure 1: NHS and Public Health Structures from the National to Local level in Norfolk
LOCAL PLANNING AUTHORITIES

In Norfolk there are a number of district, borough and city councils with local planning roles and responsibilities:

- Breckland District Council
- Broadland District Council
- Great Yarmouth Borough Council
- King’s Lynn and West Norfolk Borough Council
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council

The Broads Authority, which is a statutory body established in 1989 with a duty to manage the Norfolk and Suffolk Broads, is also classified as a local planning authority. It is the sole district planning authority in relation to land within the broads which has equivalent status to a National Park (Norfolk and Suffolk Broads Act, 1988). Norfolk County Council is responsible for determining planning applications related to mineral extraction, waste management facilities and developments by the County Council.

HEALTH AND WELLBEING BOARDS:

Health and Wellbeing Boards bring together local authorities, the NHS, communities and wider partners to share system leadership across the health and social care system; and have a duty to encourage integrated working between commissioners of services, and between the functions of local government (including planning). Each Health and Wellbeing Board is responsible for producing a Health and Well-being Strategy which is underpinned by a Joint Strategic Needs Assessment. This will be a key strategy for a local planning authority to take into account to improve health and well-being.
THE PLANNING PROCESS – KEY STAGES

There are three key stages in the town planning process (illustrated in figure 2 below): plan making; planning applications and implementation.

2.1 PLAN MAKING

The town planning process is plan-led and local planning authorities produce Local Plans to set the planning strategy for their area, to be achieved through strategic policies (such as in the adopted Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk - see policy 7 for Health), and through site allocations and detailed development management policies. These policies are used to assess planning applications. Local Plans include housing targets. The allocation of sites establishes the principle that specific types and scales of development are appropriate in specific locations. This includes allocating sites for housing and mixed-use development to meet housing targets. It also provides healthcare planners and commissioners with the potential to take a long term strategic approach to allocating sites to meet health infrastructure needs.

Local Plans may be produced as a single document or as a suite of documents. In general, a Local Plan will take three to five years to produce. Local Plans, and Neighbourhood Plans (usually prepared by local communities), must take account of guidance in the National Planning Policy Framework (NPPF). The NPPF sets out the wide ranging ways in which planning should promote healthy communities, requiring Local Plans to:

- Involve work with other authorities and providers to assess the quality and capacity of infrastructure for health and its ability to meet forecast demands;
- Set strategic priorities for their area for the provision of health facilities, taking account of local health strategies;
- Involve work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being;
- Support safe, secure and healthy communities, with local services and employment accessible by active and sustainable travel modes;
- Promote good design of development and the provision of landscaping, open spaces and green links to enable people to lead healthy and active lifestyles;
- Take account of the effects of noise and pollution on health;
• Promote a diverse mix of uses, affordable housing, a mix of types of housing (including sheltered accommodation), minimum size standards and adaptable and energy efficient homes;

• Address climate change, including issues such as drainage and flood risk, water efficiency, resilience, biodiversity and trees;

• Encourage multiple benefits from the use of land, recognising that some open land can perform many functions (such as for food production).

Local Plans are subject to Sustainability Appraisal (SA) to assess the likely economic, social and environmental effects of policies. Specific questions are generally included about the built and natural environment encouraging healthy lifestyles and providing necessary health service infrastructure. This is an opportunity to ensure Councils are considering the relative merits of different sites and policies properly against public health related issues. The considerations that go into the Sustainability Appraisal are essential to what follows in the Local Plan and so early engagement in the Sustainability Appraisal process by NCC Public Health can make the biggest difference to the resultant Local Plan. Increasingly, assessment of the viability of development is important and local planning authorities must ensure that costs resulting from policy requirements would not make development unviable.

Therefore all Local Plans should contain policies to ensure health issues are considered in new development. Many more recent Local Plans set a requirement for Health Impact Assessments to be undertaken by developers of larger scale housing developments. In addition, local planning authorities have a ‘duty to cooperate’ on plan making. This requires them to work with prescribed bodies including CCGs and NHS England, as well as other local authorities, to cooperate on strategic cross boundary matters such as health infrastructure.

2.2 PLANNING APPLICATIONS

Except for limited types of permitted development such as the conversion of offices to housing, planning permission is required for housing development. An application will generally be granted permission if it is in accordance with the Local Plan, unless there are material considerations that indicate otherwise. Since there is a substantial cost to making a planning application, most promoters usually only apply if they are reasonably confident of getting consent. If an application is refused there is an appeal process via the Secretary of State, which can be costly for the promoter or developer.
• Pre application discussions: Early consultation and liaison on development proposals, although not always a formal requirement, is beneficial in enabling policy requirements to be clearly set out and in resolving potential problems or conflicts before a formal application is submitted. Following any discussions, developers submit either outline or full planning applications.

• Outline applications: An application for outline planning permission allows a decision to be made on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more detailed ‘reserved matters’. On large sites, it is common to secure an outline permission for the whole site and then to apply for full permissions for specific phases of development over time.

• Full applications: An application for full planning permission results in a decision on the detail of how a site or part of a site can be developed. This is where the local authority’s planning policies are applied in detail to planning applications made by promoters and/or house builders. The planning officer dealing with an application will often negotiate, and suggest ways to improve the scheme; but the main part of the job is to make a recommendation to approve or refuse planning consent. An officer may have delegated responsibility to issue consent, but on large schemes that decision is usually taken by a council’s Planning Committee. If planning permission is granted (which usually lasts for 3 years), subject to compliance with planning conditions, development can take place.

2.3 IMPLEMENTATION

The final stage is implementation of a planning permission. The timing of the implementation of schemes granted planning permission, and in some cases whether they are implemented at all, cannot be guaranteed. From the developer’s perspective the planning system is only an element of the construction process. Issues may arise that delay implementation. These can be varied, and often relate to site costs, access to finance and the availability of construction staff or materials. Also, if a house-builder already has other schemes on site in the same market area, and is making healthy profits, there may be business reasons not to build out of all their development sites at once.
Figure 2: The key planning stages for building development

**Local Plans**
- **Planning**
- **Local Plans** include strategic policies, detailed development management policies and site allocations
- These may be produced as a single document or as separate documents which together form the Local Plan
- Local Plans usually take 3-5 years to produce
- **Developers** - Landowners and developers put sites forward for allocation and may have option agreements
- Health commissioning organisations can contribute to Sustainability Appraisal

**Planning Applications**
- **Pre application discussions, outline and full planning permissions**
- The time taken to secure planning permission usually depends on the scale and complexity of development. It can take months, but can extend over several years.

**Implementation**
- **Getting started on site**
- Depending on issues faced by developers such as finance availability and other development taking place nearby, this may take a few months, but can extend over several years. Phasing of larger developments, sometimes over a number of years, is normal.
3 PROCESS FOR HEALTH COMMISSIONERS’ ENGAGEMENT IN PLANNING

3.1 PLAN MAKING

The extensive consultation that takes place on plan making provides the most significant opportunity for healthcare planners and commissioners to use their expertise to ensure that Local and Neighbourhood Plans reflect national and local health priorities adequately. NCC public health will act as the central point of contact and co-ordinating input. NCC Public Health will, where possible, provide a collective response/input into Local Plans taking into account the views of other Healthcare planners and commissioners (e.g. CCGs and NHS England). However, the respective LPA will need to consult all statutory health consultees during the preparation of their Local Plans.

To meet National Planning Policy Framework (NPPF) requirements, it is important for relevant health planning and commissioning bodies to ensure that strategic Local Plan policies reflect their own strategic priorities and the available evidence base. Evidence on likely long term overall growth needs and the consequent strategic health needs will be key. Public Health and local planning authorities in Norfolk have made available provisional figures, based on demographic modelling, for likely annual and long term population growth in each CCG area. This evidence assists both Local Plan making authorities and the relevant healthcare commissioning bodies to assess future health facilities and workforce needs and to plan accordingly.

This evidence is intentionally “high level” to assist strategic planning. It is provided at the CCG level and is not intended to be site specific as it is the role of the relevant healthcare commissioning bodies to determine how best to address the health care needs resulting directly from specific new developments. However, updated data will be available which will, along with an improved understanding of the implementation of new housing schemes, provides a valuable evidence base to assist healthcare planners and commissioners in planning for health needs in the medium and long term. Appendix 1 contains figures by CCG area using scenario based population projections for the estimated annual and long term needs identified to 2036 for acute care (hospitals), intermediate care and general practitioners/primary service requirements. These use forecasts of hospital admissions and length of stay and take into account the increasing focus on meeting health care needs away from hospitals. The ability of the relevant healthcare planning and commissioning bodies to understand the specific locations in which housing development is to be allocated will assist in identifying health investment priorities.
It may also be possible for health care planners and commissioners to propose specific sites to be allocated for health infrastructure development to meet medium to long term needs. The engagement of NCC Public Health in Local Plans is vital for helping Local Planning Authorities justify policies that give the best chance of negotiating development that promotes the population’s health and wellbeing. The requirement for Health Impact Assessments to be done by developers to assess how their proposals will create healthy communities and provide adequate health facilities can only be set through a Local Plan policy. Norfolk County Council Public Health have the opportunity to advise on appropriate policies in Local Plans. Engagement on plan making will be ongoing. Local Development Schemes for each district provide timetables for plan making, enabling NCC Public Health, together with the relevant commissioning health bodies, to ensure that the right evidence is made available for consideration by plan makers at the right time.

3.2 PLANNING APPLICATIONS

While Norfolk County Council (NCC) Public Health are informed of planning applications for significant housing developments as county councils are statutory consultees, other health planning and commissioning bodies are not listed nationally as statutory consultees on such applications. One of the aims of this document therefore is to raise awareness of the importance of local planning authorities in Norfolk gaining input not only from NCC Public Health, but also from other relevant health service planning and commissioning bodies on significant housing developments. NCC Public Health’s role as co-ordinator between local planning authorities and the other health service planning and commissioning bodies will assist both in ensuring that development is planned to enable healthy lifestyles and allow service delivery to be planned effectively.

It is particularly important that NCC Public Health is consulted alongside the relevant healthcare planning and commissioning bodies, on proposals for development aimed at groups in society with distinct health needs such as the elderly and students. The respective district councils’ planning services should therefore consult NCC Public Health on planning applications submitted for housing developments of 50 dwellings or more and for those including care homes, housing for the elderly, student accommodation and any proposals which would lead to significant loss of public open space. This should include informing NCC Public Health of any relevant pre-application discussions. Discussions and comments provided on all planning applications will make use of the criteria set out in the Health and Wellbeing Checklist (Appendix 2). Planning officers should make developers aware of this checklist and the benefits of taking account of it in working up housing proposals,
though unless Local Plan policies are in place to require Health Impact Assessments (HIAs) to be submitted, their completion cannot be a requirement.

PRE-APPLICATION DISCUSSIONS

Since pre-application discussions are held for most of the larger scale proposals, NCC Public Health will attend meetings and provide comments on pre-application proposals in Norfolk for all housing developments of 50 dwellings or more, for those including care homes, housing for the elderly, student accommodation and for proposals which would lead to significant loss of public open space when resources allow. NCC Public Health may adjust this threshold of 50 dwellings in the future in consultation with the local authority planners. Where HIAs are required, which currently only applies in Norfolk in Greater Norwich (only for developments of over 500 dwellings), pre-application discussions should include the HIA’s scope and nature.

Engagement in pre-application discussions will, in many cases, be the most important stage of involvement in the planning application process as it enables NCC Public Health to influence the design principles of development at its earliest stage. This engagement will also assist in strengthening Development Management officers in negotiating with developers. It will also enhance NCC Public Health and the relevant healthcare planning and commissioning bodies’ intelligence and understanding of health infrastructure needs arising from proposed development.

OUTLINE PLANNING APPLICATIONS

Consultations on outline applications provide an excellent opportunity for NCC Public Health to comment on emerging development proposals, influencing the eventual development form and identifying whether additional health facilities may be required to serve the community. Adding to the information gained through the Local Plan site allocation process, outline applications enable NCC Public Health to gain further knowledge of the scale and likely timescale for delivery of housing. They also provide an additional opportunity for NCC Public Health to influence the form of a development before detailed proposals are submitted. Only a proportion of major housing applications, usually the larger scale and more complex proposals, will include an outline phase.

FULL PLANNING APPLICATIONS

Consultation on a full planning application is the final opportunity for NCC Public Health to influence development proposals. NCC Public Health will provide a written response to a consultation from a planning officer within 21 days of the consultation,
subject to negotiated extension time. This period includes an opportunity for communication between NCC Public Health, Public Health England, NHS England Area Team including NHS Estates if required, and the respective CCGs, on the initial results of modelled output. The criteria set out in the Health and Wellbeing checklist (see Appendix 2) will be used as the basis of detailed comments.

The written response from NCC Public Health will be reported in the planning officer’s report. NCC Public Health will provide a copy of the response to the respective CCG. Where NCC Public Health have provided a written response to a planning application case officer they should receive in writing notification of the planning decision including any relevant conditions attached to the planning decision. It is expected that the relevant local authority will maintain communications between the planning officer, NCC Public Health and the respective CCG or any other relevant health service commissioning body, as its ‘duty to cooperate’ as created in the Localism Act 2011 and subsequent amendment(s).

3.3 IMPLEMENTATION

Since the timing of the implementation of schemes granted planning permission cannot be guaranteed, it is very important that both NCC Public Health and Healthcare Commissioners have access to the best available information on delivery that the local planning authority can provide. In most cases, the main source of information will be the Annual Monitoring Report (AMR) produced by each local planning authority, usually at the end of the calendar year. The AMR includes details of housing completions in the last year on a site by site basis. It also includes housing delivery forecasts for each year for the next five years on a site by site basis, and a single figure for each site for the period beyond five years. Planning authorities may also provide more regular delivery updates or more detailed forecasts. The potential for providing more detail to aid NCC Public Health and the relevant healthcare commissioners should be investigated with each local planning authority. NCC Public Health attendance, subject to availability of officer resource, at bi-annual meetings held between district planning policy officers and Norfolk County Council officers will ensure that NCC Public Health and Healthcare Commissioners are informed of the best available information on implementation for each district. Separate meetings should be organised by planning policy officers from each district council with the relevant healthcare commissioners to inform them of progress on both local plan development and on site delivery.
1. Plan making
Extensive consultation over a significant period provides the opportunity for NCC Public Health to ensure that Local Plans reflect national and local health strategies and priorities and address infrastructure needs;
NCC Public Health to take account of Local Development Schemes and ensure evidence is available for consideration by plan makers.

2. Planning applications
NCC Public Health to be consulted on all planning applications for housing developments of 50 dwellings or more, and for care homes, housing for the elderly, student accommodation and loss of open space.
NCC Public Health comments to focus on ensuring development will enable healthy lifestyles and allow service delivery to be planned effectively.

| Pre-Application discussions | NCC Public Health will attend meetings as appropriate and provide comments on all pre-application proposals consulted on, when resources allow. |
|                           | Where HIAs are required discussions should include its scope and nature. |

| Outline Planning applications | NCC Public Health will provide comments on all pre-application proposals they are consulted on; usually only large complex proposals are included in outline phase. |
|                             | Enables NCC Public Health to enhance its intelligence on the scale and timeframe for housing developments and to influence the form of development. |

| Full planning applications | Final opportunity for NCC Public Health to influence development proposals. |
|                          | NCC Public Health will provide a written response within 21 days of receipt of the request, in consultation with relevant commissioning health bodies, subject to negotiated extension time. Response will be reported in the planning officer’s report. |

3. Implementation
NCC Public Health provided with best available information on implementation from the LPAs at biennial meetings. Similar meetings will be held between LPAs and Health Care Commissioners annually.

4. Accountability
NCC Public Health will report to the Health and Wellbeing Board annually, on a ‘need to know basis’.
ACCOUNTABILITY

NCC Public Health, through the Director of Public Health, will provide an annual report to the Health and Well-being Board on its contribution to Local Plans and on responses provided to local planning authorities on planning applications. This report will be provided on ‘a need to know basis’.

CONCLUSION

It is widely acknowledged that the environment in which we are born, grow, live, work and play (Marmot, 2010) is a major determinant of our health and well-being. Housing quality, air pollution, road infrastructure, access to green space and walkability of our neighbourhoods, along with many other social and environmental factors, contribute directly to our health and well-being and can impact on our ability to live healthy lifestyles. The ability to access appropriate health services when we need them is also a key requirement for our health and well-being.

This is recognised by the National Planning Policy Framework which sets out wide ranging ways in which local planning authorities together with their public health and health service colleagues can contribute to maintaining the health promoting environment.

This paper outlines a documented process that will help to ensure that local planning authorities can work effectively with their public health and health service colleagues to ensure the recommendations within the National Planning Policy Framework are carried forward and that the principles of promoting health and well-being through the local planning system are implemented across Norfolk.

The collaboration between NCC Public Health and local planning authorities in following this documented process provides an opportunity to share expertise between the sectors and to support the healthy growth across the communities of Norfolk. It will also enable NCC Public Health to facilitate engagement of Healthcare Commissioners and through the use of the healthcare requirements modelling tool will assist in the long term strategic planning of health service infrastructure.
REFERENCES


Appendix 1  Projected Healthcare Requirements for Norfolk and Waveney 2036
Introduction

This appendix provides modelling estimates, based on different housing growth scenarios, for the total and additional health care needs required in Norfolk and Waveney for 2036 to take into account projected growth. The figures are high level and contribute to understanding the potential strategic needs for CCG areas, and are not intended to set requirements for specific developments.

This is the first stage in quantifying various “health” needs locally and that further discussion and analysis will be needed as part of the Local Plan process in terms of identifying the potential for new allocations and/or policies to address these health needs.

Inputs for the healthcare requirements projections for 2036

The first assumption is that admission rates, day case rates, etc. will continue to change as they have done in the past, allowing us to build this “Do Nothing” scenario for the system. The model however, allows us to modify inputs and assumptions so that local knowledge or anticipated changes are included where necessary.

The inputs and assumptions used to calculate the healthcare requirements shown in this document are as follows:

- **Average number of houses built per year by district:** The healthcare requirements have been estimated for the projected population for a “Low”, “Medium” and “High” build rate scenarios. The “High” build rate scenario corresponds to the OAN (Objectively Assessed Need for housing) figure established through the Strategic Housing Market Assessments (SHMAs) for districts, except in the case of Waveney. For Waveney, the figures have been extrapolated forward to 2036 from the current local plan housing targets to 2025 as there is not yet an OAN figure beyond 2025.

The average number of houses built for each scenario is as follows:

<table>
<thead>
<tr>
<th>District</th>
<th>Low</th>
<th>Medium</th>
<th>High/OAN</th>
<th>ONS 2012 avg.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breckland</td>
<td>283</td>
<td>424</td>
<td>565</td>
<td>550</td>
</tr>
<tr>
<td>Broadland</td>
<td>279</td>
<td>418</td>
<td>558</td>
<td>405</td>
</tr>
<tr>
<td>Great Yarmouth</td>
<td>210</td>
<td>315</td>
<td>420</td>
<td>382</td>
</tr>
<tr>
<td>King’s Lynn &amp; West Norfolk</td>
<td>650</td>
<td>680</td>
<td>710</td>
<td>557</td>
</tr>
<tr>
<td>North Norfolk</td>
<td>189</td>
<td>284</td>
<td>379</td>
<td>425</td>
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<tr>
<td>Norwich</td>
<td>382</td>
<td>573</td>
<td>763</td>
<td>566</td>
</tr>
<tr>
<td>South Norfolk</td>
<td>449</td>
<td>674</td>
<td>898</td>
<td>681</td>
</tr>
<tr>
<td>Waveney</td>
<td>145</td>
<td>218</td>
<td>290</td>
<td>332</td>
</tr>
</tbody>
</table>

*The houses for ONS 2012 are shown for illustration purposes only. The scenario for ONS 2012 uses the CCG population projections from ONS mid 2012 rather than the number of houses built.*
Population projections by CCG for each scenario: These were calculated at district level for each scenario for 10 year age bands based on the 2012 Subnational Population Projections by the ONS. The population was then allocated to the corresponding CCGs assuming the current district distribution within the CCGs for all the years in the projections. Please see page 16 for details.

Forecasted hospital admission rates and average length of stay: The number of admissions for each CCG/Scenario, were calculated using projected admission rates and projected lengths of stay based on 9 years of historical data from 2005/06 to 2013/14. Any projection beyond nine years (2022 onwards) will be unreliable and should be treated with caution.

The admission rates and length of stay, were calculated for each 10 year age band for Ordinary elective, Elective day cases and Non-elective admission rates/length of stay separately. All specialties were considered, apart from Well Babies.

The projected admission rates were calculated using a linear projection and the number of day cases were limited to 90% of all elective admissions. The length of stay was calculated using an exponential decay function to make sure that length of stay does not become negative. These calculations can be changed if better data and/or models are available.

Occupancy rate: Assumed an occupancy rate of 85%.

Bed-days availability: Assumed 365 available bed days for acute health care and 447 for intermediate care.

Current Bed Availability

<table>
<thead>
<tr>
<th>Provider</th>
<th>Overnight Beds Available</th>
<th>Occupied (% Occupied)</th>
<th>General &amp; Acute</th>
<th>Learning Disabilities</th>
<th>Maternity</th>
<th>Mental Illness</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Queen Elizabeth Hospital, King’s Lynn, NHS Foundation Trust</td>
<td>438</td>
<td>386 (88%)</td>
<td>413</td>
<td>369 (89%)</td>
<td>0</td>
<td>0 (-)</td>
</tr>
<tr>
<td>James Paget University Hospitals, NHS Foundation Trust</td>
<td>465</td>
<td>397 (85%)</td>
<td>423</td>
<td>383 (90%)</td>
<td>0</td>
<td>0 (-)</td>
</tr>
<tr>
<td>Norfolk and Norwich University Hospitals, NHS Foundation Trust</td>
<td>1041</td>
<td>967 (93%)</td>
<td>994</td>
<td>935 (94%)</td>
<td>0</td>
<td>0 (-)</td>
</tr>
<tr>
<td>Norfolk and Suffolk, NHS Foundation Trust</td>
<td>459</td>
<td>414 (90%)</td>
<td>0</td>
<td>0 (-)</td>
<td>20</td>
<td>14 (72%)</td>
</tr>
<tr>
<td>Norfolk Community Health and Care, NHS Trust</td>
<td>254</td>
<td>239 (94%)</td>
<td>244</td>
<td>231 (95%)</td>
<td>10</td>
<td>8 (81%)</td>
</tr>
</tbody>
</table>

The total number of beds available for the providers in Norfolk and Waveney, i.e. QEH, JPH and NNUH, is 2369 (1944 overnight and 425 day beds). Please note that Norfolk and Waveney residents could go to providers in other areas.


<table>
<thead>
<tr>
<th>Provider</th>
<th>Total</th>
<th>General &amp; Acute</th>
<th>Learning Disabilities</th>
<th>Maternity</th>
<th>Mental Illness</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Queen Elizabeth Hospital, King’s Lynn, NHS Foundation Trust</td>
<td>111</td>
<td>111 (100%)</td>
<td>0</td>
<td>3 (100%)</td>
<td>0</td>
</tr>
<tr>
<td>James Paget University Hospitals, NHS Foundation Trust</td>
<td>108</td>
<td>108 (100%)</td>
<td>0</td>
<td>0 (100%)</td>
<td>0</td>
</tr>
<tr>
<td>Norfolk and Norwich University Hospitals, NHS Foundation Trust</td>
<td>241</td>
<td>241 (100%)</td>
<td>0</td>
<td>0 (100%)</td>
<td>0</td>
</tr>
<tr>
<td>Norfolk and Suffolk, NHS Foundation Trust</td>
<td>0</td>
<td>0 (-)</td>
<td>0</td>
<td>0 (-)</td>
<td>0</td>
</tr>
<tr>
<td>Norfolk Community Health and Care, NHS Trust</td>
<td>0</td>
<td>0 (-)</td>
<td>0</td>
<td>0 (-)</td>
<td>0</td>
</tr>
</tbody>
</table>

The total number of beds available for the providers in Norfolk and Waveney, i.e. QEH, JPH and NNUH, is 2369 (1944 overnight and 425 day beds). Please note that Norfolk and Waveney residents could go to providers in other areas.

**Current GPs, Nurses and Direct Patient Care**

<table>
<thead>
<tr>
<th>CCG</th>
<th>Registered GP Patients</th>
<th>All Practitioners FTE</th>
<th>Practitioners (excluding retainers &amp; registrars) FTE</th>
<th>Number of patients per FTE GP</th>
</tr>
</thead>
<tbody>
<tr>
<td>NHS Great Yarmouth and Waveney CCG</td>
<td>234,099</td>
<td>142</td>
<td>137</td>
<td>1,710</td>
</tr>
<tr>
<td>NHS North Norfolk CCG</td>
<td>165,956</td>
<td>117</td>
<td>108</td>
<td>1,542</td>
</tr>
<tr>
<td>NHS Norwich CCG</td>
<td>213,049</td>
<td>134</td>
<td>129</td>
<td>1,647</td>
</tr>
<tr>
<td>NHS South Norfolk CCG</td>
<td>229,261</td>
<td>155</td>
<td>152</td>
<td>1,503</td>
</tr>
<tr>
<td>NHS West Norfolk CCG</td>
<td>168,834</td>
<td>124</td>
<td>117</td>
<td>1,445</td>
</tr>
</tbody>
</table>

**Table 3 Full Time Equivalent (FTE) GPs by CCG as at 30 September 2015, [http://www.hscic.gov.uk/catalogue/PUB16934](http://www.hscic.gov.uk/catalogue/PUB16934)**

<table>
<thead>
<tr>
<th>CCG</th>
<th>Registered GP Patients</th>
<th>All Nurses FTE</th>
<th>Advanced Nurse FTE</th>
<th>Extended Nurse FTE</th>
<th>Practice Nurses FTE</th>
<th>Number of Patients per FTE nurse</th>
<th>Direct Patient Care FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>NHS Great Yarmouth and Waveney CCG</td>
<td>234,099</td>
<td>79</td>
<td>25</td>
<td>8</td>
<td>46</td>
<td>2,973</td>
<td>34</td>
</tr>
<tr>
<td>NHS North Norfolk CCG</td>
<td>165,956</td>
<td>74</td>
<td>33</td>
<td>16</td>
<td>24</td>
<td>2,254</td>
<td>120</td>
</tr>
<tr>
<td>NHS Norwich CCG</td>
<td>213,049</td>
<td>60</td>
<td>14</td>
<td>15</td>
<td>30</td>
<td>3,568</td>
<td>29</td>
</tr>
<tr>
<td>NHS South Norfolk CCG</td>
<td>229,261</td>
<td>72</td>
<td>21</td>
<td>17</td>
<td>34</td>
<td>3,198</td>
<td>92</td>
</tr>
<tr>
<td>NHS West Norfolk CCG</td>
<td>168,834</td>
<td>61</td>
<td>13</td>
<td>18</td>
<td>31</td>
<td>2,745</td>
<td>83</td>
</tr>
</tbody>
</table>

**Table 4 Full Time Equivalent (FTE) Nurses and Direct Patient Care by CCG as at 30 September 2015, [http://www.hscic.gov.uk/catalogue/PUB16934](http://www.hscic.gov.uk/catalogue/PUB16934)**
**Healthcare requirements projections for 2036**
The projected Healthcare requirements for 2036 assuming that admission rates for age bands continue to change the way they have in the past are as follows: (Please see page 17 for further details on calculations/definitions).

### Norfolk and Waveney

<table>
<thead>
<tr>
<th>Requirements for 2036</th>
<th>Health Care requirements by the total CCG population</th>
<th>Health Care requirements due to new builds (Corresponding scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Projected population</td>
<td>900,363, 1,048,117, 1,106,049, 1,163,880, 1,125,170</td>
<td>312, 427, 541, 484</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>3,811, 4,123, 4,238, 4,353, 4,295</td>
<td>71, 97, 122, 107</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>698, 770, 795, 821, 806</td>
<td>240, 330, 419, 376</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>3,113, 3,353, 3,443, 3,532, 3,489</td>
<td>98, 133, 167, 145</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>1,114, 1,213, 1,247, 1,282, 1,259</td>
<td>49, 66, 84, 72</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>557, 606, 624, 641, 629</td>
<td>49, 66, 84, 72</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>557, 606, 624, 641, 629</td>
<td>49, 66, 84, 72</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>500, 582, 614, 647, 625</td>
<td>82, 114, 146, 125</td>
</tr>
</tbody>
</table>

The number of houses for ONS 2012 is shown for illustration purposes only and has been calculated using linear interpolation between the Medium and High scenarios for 2036.
# Healthcare requirements for Central Norfolk CCGs (NHS North Norfolk CCG, NHS Norwich CCG and NHS South Norfolk CCG)

<table>
<thead>
<tr>
<th>Central Norfolk CCGs</th>
<th>Health Care requirements by total CCG population</th>
<th>Health Care requirements due to new builds (Corresponding scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>requirements for 2036</strong></td>
<td><strong>No Build</strong></td>
<td><strong>Low</strong></td>
</tr>
<tr>
<td>Houses built per year</td>
<td>0</td>
<td>1,525</td>
</tr>
<tr>
<td>Projected population</td>
<td>547,940</td>
<td>637,896</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>2,359</td>
<td>2,531</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>368</td>
<td>404</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>1,991</td>
<td>2,126</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>618</td>
<td>668</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>309</td>
<td>334</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>309</td>
<td>334</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>304</td>
<td>354</td>
</tr>
</tbody>
</table>

# Healthcare requirements for NHS Great Yarmouth and Waveney CCG

<table>
<thead>
<tr>
<th>NHS Great Yarmouth and Waveney CCG</th>
<th>Health Care requirements by total CCG population</th>
<th>Health Care requirements due to new builds (scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>requirements for 2036</strong></td>
<td><strong>No Build</strong></td>
<td><strong>Low</strong></td>
</tr>
<tr>
<td>Houses built per year</td>
<td>0</td>
<td>355</td>
</tr>
<tr>
<td>Projected population</td>
<td>193,773</td>
<td>213,398</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>752</td>
<td>795</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>175</td>
<td>185</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>578</td>
<td>610</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>238</td>
<td>251</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>119</td>
<td>126</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>119</td>
<td>126</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>108</td>
<td>119</td>
</tr>
</tbody>
</table>
### Healthcare requirements for NHS North Norfolk CCG

<table>
<thead>
<tr>
<th>NHS North Norfolk CCG</th>
<th>Health Care requirements by total CCG population</th>
<th>Health Care requirements due to new builds (scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>requirements for 2036</strong></td>
<td>No Build</td>
<td>Low</td>
</tr>
<tr>
<td>Houses built per year</td>
<td>0</td>
<td>300</td>
</tr>
<tr>
<td>Projected population</td>
<td>153,728</td>
<td>172,650</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>865</td>
<td>916</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>121</td>
<td>130</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>744</td>
<td>786</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>191</td>
<td>203</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>95</td>
<td>101</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>95</td>
<td>101</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>85</td>
<td>96</td>
</tr>
</tbody>
</table>

### Healthcare requirements for NHS Norwich CCG

<table>
<thead>
<tr>
<th>NHS Norwich CCG</th>
<th>Health Care requirements by total CCG population</th>
<th>Health Care requirements due to new builds (scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>requirements for 2036</strong></td>
<td>No Build</td>
<td>Low</td>
</tr>
<tr>
<td>Houses built per year</td>
<td>0</td>
<td>550</td>
</tr>
<tr>
<td>Projected population</td>
<td>180,987</td>
<td>209,698</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>800</td>
<td>852</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>106</td>
<td>116</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>695</td>
<td>736</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>124</td>
<td>135</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>62</td>
<td>68</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>62</td>
<td>68</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>101</td>
<td>116</td>
</tr>
</tbody>
</table>
### Healthcare requirements for NHS South Norfolk CCG

<table>
<thead>
<tr>
<th>NHS South Norfolk CCG</th>
<th>Health Care requirements by total CCG population</th>
<th>Health Care requirements due to new builds (scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>requirements for 2036</strong></td>
<td><strong>No Build</strong></td>
<td><strong>Low</strong></td>
</tr>
<tr>
<td>Houses built per year</td>
<td>0</td>
<td>675</td>
</tr>
<tr>
<td>Projected population</td>
<td>213,225</td>
<td>255,548</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>693</td>
<td>762</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>141</td>
<td>158</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>552</td>
<td>604</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>302</td>
<td>330</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>151</td>
<td>165</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>151</td>
<td>165</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>118</td>
<td>142</td>
</tr>
</tbody>
</table>

### Healthcare requirements for NHS West Norfolk CCG

<table>
<thead>
<tr>
<th>NHS West Norfolk CCG</th>
<th>Health Care requirements by total CCG population</th>
<th>Health Care requirements due to new builds (scenario - No Build)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>requirements for 2036</strong></td>
<td><strong>No Build</strong></td>
<td><strong>Low</strong></td>
</tr>
<tr>
<td>Houses built per year</td>
<td>0</td>
<td>707</td>
</tr>
<tr>
<td>Projected population</td>
<td>158,650</td>
<td>196,823</td>
</tr>
<tr>
<td>Total Acute beds required</td>
<td>700</td>
<td>797</td>
</tr>
<tr>
<td>Day Cases beds required</td>
<td>156</td>
<td>180</td>
</tr>
<tr>
<td>Overnight beds required</td>
<td>544</td>
<td>616</td>
</tr>
<tr>
<td>Total Intermediate Care required</td>
<td>259</td>
<td>294</td>
</tr>
<tr>
<td>Intermediate beds required</td>
<td>129</td>
<td>147</td>
</tr>
<tr>
<td>Intermediate day spaces required</td>
<td>129</td>
<td>147</td>
</tr>
<tr>
<td>Number of GPs required</td>
<td>88</td>
<td>109</td>
</tr>
</tbody>
</table>
2013-37 Projections for Population, Acute beds, Overnight beds, Day Case beds, Admissions and Average Length of Stay

Norfolk & Waveney

N&W Populations Projections 2013 - 37

N&W Admissions 2012 - 37

N&W Average Length of Stay 2012 - 37

N&W Acute beds required 2013-37

N&W Day Case beds required 2013-37

N&W Overnight beds required 2013-37
Calculations

Resident Population Projections by CCG

Using POPGROUP, the resident population projections for each district were calculated using the number of houses built per year for each scenario. (POPGROUP projections not available for CCGs). The number of houses per district per scenario is as follows:

<table>
<thead>
<tr>
<th>District</th>
<th>Low</th>
<th>Medium</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breckland</td>
<td>283</td>
<td>424</td>
<td>565</td>
</tr>
<tr>
<td>Broadland</td>
<td>279</td>
<td>418</td>
<td>558</td>
</tr>
<tr>
<td>Great Yarmouth</td>
<td>210</td>
<td>315</td>
<td>420</td>
</tr>
<tr>
<td>King’s Lynn &amp; West Norfolk</td>
<td>650</td>
<td>680</td>
<td>710</td>
</tr>
<tr>
<td>North Norfolk</td>
<td>189</td>
<td>284</td>
<td>379</td>
</tr>
<tr>
<td>Norwich</td>
<td>382</td>
<td>573</td>
<td>763</td>
</tr>
<tr>
<td>South Norfolk</td>
<td>449</td>
<td>674</td>
<td>898</td>
</tr>
<tr>
<td>Waveney</td>
<td>145</td>
<td>218</td>
<td>290</td>
</tr>
</tbody>
</table>

The “High” scenario figures are based on the OAN (Objectively Assessed Need for housing). Waveney figure is based on the current local plan housing targets to 2025 extrapolated forward to 2036 as there is not yet an OAN figure beyond 2025.

POPGROUP uses births, deaths, migration rates from the mid-2012 ONS projections and the household/dwellings ratio per district in 2011 to calculate the population projections (using the same methodology as in the mid-2012 ONS projections). The CCG’s population was then allocated using the proportion of the ONS mid-2013 district population estimates in the corresponding CCG. The proportions are:

<table>
<thead>
<tr>
<th>CCG</th>
<th>District</th>
<th>Prop. of population in CCG</th>
</tr>
</thead>
<tbody>
<tr>
<td>NHS Great Yarmouth and Waveney CCG</td>
<td>Great Yarmouth</td>
<td>100.00%</td>
</tr>
<tr>
<td>NHS Great Yarmouth and Waveney CCG</td>
<td>Waveney</td>
<td>100.00%</td>
</tr>
<tr>
<td>NHS North Norfolk CCG</td>
<td>Broadland</td>
<td>52.92%</td>
</tr>
<tr>
<td>NHS North Norfolk CCG</td>
<td>North Norfolk</td>
<td>100.00%</td>
</tr>
<tr>
<td>NHS Norwich CCG</td>
<td>Broadland</td>
<td>47.08%</td>
</tr>
<tr>
<td>NHS Norwich CCG</td>
<td>Norwich</td>
<td>100.00%</td>
</tr>
<tr>
<td>NHS South Norfolk CCG</td>
<td>Breckland</td>
<td>82.86%</td>
</tr>
<tr>
<td>NHS South Norfolk CCG</td>
<td>South Norfolk</td>
<td>100.00%</td>
</tr>
<tr>
<td>NHS West Norfolk CCG</td>
<td>Breckland</td>
<td>17.14%</td>
</tr>
<tr>
<td>NHS West Norfolk CCG</td>
<td>King’s Lynn &amp; West Norfolk</td>
<td>100.00%</td>
</tr>
</tbody>
</table>
Acute Healthcare requirements
The number of beds required were calculated based on the formulas/assumptions used by the HUDU model and are built on the assumption that admission rates and length of stay continue to change in the way that they have done in the past as follows:

\[ \text{Number of beds required} = \frac{\text{bed days required}}{\text{Occupancy rate} \times \text{Available bed days}} \]

Where:
- Beds required = no. of admissions by CCG \times \text{forecasted average length of stay}
- No. of admissions by CCG = CCG Population Projection for scenario \times \text{admission rate}
- Admission rate = \frac{\text{Forecasted no. of admissions}}{\text{ONS 2012 Population Projection}}
- Occupancy rate = 85%
- Available bed days = 365

Intermediate Healthcare requirements
25% of reduction in length of stay is assumed to be re-directed as Intermediate Care Beds and another 25% as Intermediate Day Spaces. Both are calculated the same way for each year and include Elective and Non-Elective admissions as follows:

\[ \text{Beds/Day Spaces required} = \frac{\text{(25 % Bed Days reduction)}}{\text{Occupancy} \times \text{Available Bed Days}} \]

Where:
- Bed days reduction = (CCG Admissions x Length of Stay 2012) - (CCG Admissions x Length of Stay current year)
- CCG admissions = \frac{(\text{forecasted admissions} \times \text{ONS Population Projection for 2012})}{\text{Population for the corresponding scenario}}
- Occupancy rate = 85%
- Available Bed Days = 447

General Practitioners requirements
As per the HUDU model, the primary healthcare assumption is set at requiring a population size of 1,800 people in order to justify one General Practitioner. This is based on guidance from the Royal College of GPs.

\[ \text{Number or GPs required} = \frac{\text{CCG Resident Population projection for the scenario}}{1,800} \]

---

HUDU model is the NHS Development Unit’s online standard planning contribution model for London.
Appendix 2  A Healthy planning checklist for Norfolk
The links between planning and health are long established. The Health Map\textsuperscript{iv} shows how lifestyle factors are nested within the wider social, economic, and environmental determinants of health which are, in turn influenced by the built and natural environments in which we live. We know that developments that are carefully planned for and managed may contribute positively to the health and well-being of a community. National Planning Policy Guidance requires local planning authorities to ensure that health and well-being, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

The Healthy Planning Checklist for Norfolk has been developed to facilitate joint working to improve health. It is based upon the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Toolkit\textsuperscript{v} and the Royal Town Planning Institute (RTPI) Principles for Healthy Communities\textsuperscript{vi}. The Checklist is intended to provide a practical tool to assist developers and their agents when preparing development proposals and local planning authorities in policy making and in the application process. It also provides a framework for Norfolk County Council Public Health when considering health and wellbeing impacts of development plans and planning applications.

The checklist is structured around six healthy planning themes:

- Partnership and inclusion
- Healthy environment
- Vibrant neighbourhoods
- Active lifestyles
- Healthy housing and
- Economic activity

\textsuperscript{iv} Barton H and Grant M (2006) \textbf{A health map for the local human habitat} The Journal of the Royal Society for the Promotion of Health November 2006 126: 252-253,

\textsuperscript{v} London Healthy Urban Development Unit (2013) Rapid Health Impact Assessment Tool \url{www.healthyurbandevelopment.nhs.uk}

\textsuperscript{vi} RTPI Principles for Healthy Communities in RTPI (2009) Good practice note 5: Delivering healthy communities.
USING THE CHECKLIST.

The checklist is designed to highlight issues and facilitate discussion and can be used flexibly, reflecting the size and significance of the development. It is best used prospectively, before a plan or proposal is submitted, but can also be used concurrently and retrospectively. Used prospectively it can help assess plans and proposals and inform the design and layout of a development and influence those factors that can impact on the health and wellbeing of residents and the wider communities of Norfolk.

Consideration should be given to each of the six healthy planning themes. It is acknowledged that there will be crossover with other assessments, including environmental impact and transport assessment, and an integrated approach is encouraged.
<table>
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<th>HEALTHY PLANNING CHECKLIST</th>
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<td>Criteria to consider</td>
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<td><strong>Construction</strong></td>
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| Travel and transport | The plan or proposal has a travel plan that includes adequate and appropriate cycle parking and storage and traffic management and calming measures.  

The layout is highly permeable and includes safe, well-lit and networked pedestrian and cycle routes and crossings.  

The plan or proposal minimises travel to ensure people can access facilities they need by walking, cycling and public transport.  

The plan or proposal keeps commercial vehicles away from areas where their presence would result in danger or unacceptable disruption to the highway or cause irreparable damage. | A travel plan can promote sustainable transport and address the environmental and health impacts of a development.

Cycle parking and storage in residential dwellings can encourage cycle participation. Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase active travel.  

Developments should prioritise the access needs of cyclists and pedestrians.  

Developments should be accessible by public transport. |
<table>
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<tr>
<th>THEME 5</th>
<th>HEALTHY HOUSING</th>
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| **Accessible housing** | The plan or proposal meets all the requirements contained in National Housing standards for daylighting, sound insulation, and private space.  
The plan or proposal provides accessible homes for older or disabled people. | National Planning Policy Framework paragraph 69, 70, 73, 74.  
http://planningguidance.communities.gov.uk/ | Good daylighting can improve the quality of life and reduce the need for energy to light the home.  
Improved sound insulation can reduce noise disturbance and complaints from neighbours. The provision of an inclusive outdoor space which is at least partially private can improve the quality of life.  
Accessible and easily adaptable homes can meet the changing needs of current and future occupants. |
| **Healthy living** | The plan or proposal provides dwellings with adequate internal space, including sufficient storage space and separate kitchen and living spaces.  
Practical use for garden space is provided and where garden space is impractical effectively managed communal garden space will be provided.  
The plan or proposal encourages the use of stairs by ensuring that they are well located, attractive and welcoming. | Sufficient space is needed to allow for the preparation and consumption of food away from the living room to avoid the ‘TV dinner’ effect.  
Rather than having lifts at the front and staircases at the back of buildings hidden from view, it is preferable to have them located at the front to encourage people including those that are able to use them. |
| Housing mix and affordability | Neighbourhoods are designed with a mix of housing types and tenures and provide accommodation which is adaptable to cater for changing needs, including the ageing population. | The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable or temporary accommodation. | Both affordable and private housing should be designed to a high standard (‘tenure blind’). |
| Affordable housing is integrated in the whole site and will avoid segregation. | | | |

**THEME 6**

<table>
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<th>ECONOMIC ACTIVITY</th>
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<td>Local employment and healthy workspaces</td>
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The health impact checklist was adapted from the London Healthy Urban Development Unit, Planning for Health Rapid Health Impact Assessment Tool. The checklist was further informed by the following:

The City of Stoke-on-Trent local development framework supplementary planning document: healthy urban planning (2012);
Better health outcomes through spatial planning: a report for Cheshire West and Chester Council. Ballantyne and Blackshaw (2014);

We would also like to acknowledge the contribution of the following colleagues:

Chandraa Bhattacharya (Public Health England)  Hannah Grimes (Norfolk County Council)
Ian Burns (NHS Property Services)  Robert Lindfield (Public Health England)
David Edwards (Norfolk County Council)  Carl Petrokofsky (Public Health England)
Chimeme Egbutah (Luton Borough Council)  Andre Pinto (Public Health England)
Stephen Faulkner (Norfolk County Council)  Matt Tracey (Norfolk County Council)
Iain Green (Cambridgeshire County Council and South Cambridge District Council)  Emmeline Watson (Cambridgeshire County Council)
Planning for the right homes in the right places consultation – South Norfolk Council response

Report of the Planning Policy Manager
Cabinet Member: John Fuller, The Economy and External Affairs

CONTACT
Adam Nicholls 01508 533809
anicholls@s-norfolk.gov.uk
1. Introduction


1.2 The document takes forward a number of measures outlined in the Housing White Paper to improve the supply and delivery of housing. Perhaps the most eye-catching is the introduction of a standard approach to the assessment of housing need across England, which (if implemented) would lead to a significant simplification of the assessment process.

2. Background


2.2 Following the General Election in 2017, and the loss of an overall Conservative majority, the 24-month Queen’s Speech contained very little by way of proposed new primary planning and housing legislation. Changes to the planning system are therefore considered much more likely to come via updates to the National Planning Policy Framework and secondary legislation.

2.3 The HWP covered extensive territory, including simplifying the production of Local Plans, diversifying the supply of housebuilders (to enable SME developers to find more sites), and enabling building faster (through enhanced powers of compulsory purchase). Some of the measures included are early-stage in scope, whilst others are more advanced (and so could come forward more rapidly).

2.4 One of the more significant elements of the HWP was the proposal to introduce a standard methodology for assessing an area’s future housing requirements, the thinking being that this process is often highly technical and adversarial, costing thousands of pounds, taking months to produce and then argued over at length at Local Plan examinations.
The HWP also stated that there will be an announcement about the future of the developer contributions system (Community Infrastructure Levy/Section 106 agreements) in the Autumn Budget (which has subsequently been confirmed as being on 22nd November 2017).

3. **Planning for the right homes in the right places**

3.1 The consultation document covers six main areas, which are covered briefly below:

**Proposed approach to calculating the local housing need**

3.2 The current approach to assessing current and future housing needs is, undoubtedly, complicated, multifarious and open to differing interpretations – there is no one prescribed methodology set out in the National Planning Policy Framework (NPPF) or Planning Practice Guidance (PPG). Unsurprisingly, different councils (or their consultants) can take different approaches, and there will almost always be parties seeking to argue that the proposed housing needs number the council comes up with is too high or too low.

3.3 Wrapped up in this approach are questions like the “Liverpool” v “Sedgefield” approach (over what time period any backlog should be made up), whether a council has been a “persistent under-deliverer” of housing (in which case a 20% buffer needs to be added to the five-year land supply figure, rather than 5%) and whether the buffer should be applied to the unadjusted need figure, or the figure with backlog included.

3.4 The proposed approach is relatively simple to understand and calculate (see paragraphs 8-51 of the consultation document). In essence, it comprises the projected annual average household growth over the next 10-year period (as assessed and published regularly by DCLG), with an **adjustment factor** then applied. The adjustment factor is a calculation based on the ratio of average annual earnings to average house prices in the council area. The baseline is 4: above this, the assumption is that house prices are too high relative to local earnings, and additional housing delivery is needed to help reduce the ratio.
In simple terms, if average earnings in a council area were £25,000, and average house prices were £100,000 (i.e. a ratio of 4), no further upward adjustment to housing needs from the demographic projections alone would be necessary. If the house prices were £200,000 (a ratio of 8), an additional 25% would need to be added, and so on.

Whilst these numbers will change regularly (as new information is published about house prices, household projections etc) the Government has published a spreadsheet of what the current local housing need would be for every council in the country under this approach (see the weblink in paragraph 1.1). The South Norfolk ratio is 8.31; Broadland’s is 9.22 and Norwich’s is 6.26, which leads to a combined housing needs figure of **2052 dwellings per year** for the whole of Greater Norwich. This figure is not significant different to the figures produced by the 2017 Central Norfolk Strategic Housing Market Assessment.

Paragraph 50 invites views on whether the National Planning Policy Framework (NPPF) will should be amended to allow authorities with joint Local Plans to calculate housing land supply over the area as a whole, rather than as sub-areas.

Table 1 (on page 20 of the document) states the proposed transitional arrangements which will apply. For those councils, like in Greater Norwich, where the Local Plan has been adopted within the previous five years, the new approach is expected to be used in any new or updated Local Plan, rather than coming into effect on 31st March 2018.

**Statement of Common Ground**

Councils already must have regard to the legal Duty to Co-operate (on cross-boundary strategic planning matters) when preparing Local Plans. However, in some cases, the Government feels that this is not working effectively, with not all councils engaging thoroughly. Paragraphs 56-87 set out how a Statement of Common Ground must be prepared by councils and key partners, and kept up to date during the process of preparing a Local Plan. The presumption is that the Statement of Common Ground should apply across the Housing Market Area, unless an alternative geography is sensible and agreed.

**Planning for a mix of housing needs**

Specific types of housing will be required to be identified in future Local Plans (see paragraphs 88-92), and market signals may be interrogated to see if these specific types (such as student accommodation and older people’s accommodation) are being over-supplied or under-supplied (in additional to overall housing numbers). This is not particularly different from the current regime,
although it might raise the question again to some as to whether the Council’s Self-Build Register is likely to be an accurate record of likely need/demand for this type of housing.

**Neighbourhood Planning**

3.11 Paragraphs 94-100 cover an awkward topic of housing numbers for emerging Neighbourhood Plans and/or parish areas. Paragraph 97 says that views will be welcomed on whether LPAs should (in their Local Plans) set out housing numbers in designated neighbourhood planning areas *and parished areas*.

3.12 Where there is not a current figure available in a Local Plan, the proposal is that the overall housing number would be calculated through a pro-rata apportionment of the total housing need by share of current population (so a parish with 5% of the district’s current population would be “allocated” 5% of the district’s total future housing need).

**Proposed approach to viability assessment**

3.13 Paragraphs 101-119 set out some proposed measures to improve the transparency and reduce the complexity of viability assessments. Relatively little change is proposed to the Local Plan viability regime, but the PPG is proposed to be updated to simplify viability assessments in the Development Management context; comments are sought on what these might be. A further proposal is for councils to be required to publish funding secured through Section 106 agreements (affordable housing and infrastructure).

**Planning fees**

3.14 The long-promised increase of 20% to planning application fees is promised to happen “at the earliest opportunity” (paragraph 122), subject to parliamentary scrutiny, and this is expected to be in place by the end of 2017. The HWP suggested that a further increase of 20% might be allowed “for those authorities who are delivering the homes their communities need”, and views on appropriate criteria are sought in the current consultation.
4 Potential implications for South Norfolk and suggested responses (see Appendix 1)

Proposed approach to calculating the local housing need

4.1 The suggested approach is recommended to be supported in general; the kind of simplification suggested has been sought for some years. There are some uncertainties about it, however. Comments are recommended to be made seeking clarification about what assumptions should be made about housing numbers for years 11+ (i.e. for the last part of the Local Plan period) and the guidance should make clear that (as now) a buffer will be required to be added on top, as well as other areas.

4.2 The Council is recommended to be strongly supportive of the principle of allowing authorities which have an existing joint Local Plan to assess housing land supply across the area as a whole. This could, if implemented, allow the Greater Norwich authorities to move to using the whole of the three districts as a land supply area, rather than the NPA and two separate rural areas, which is thought likely to be advantageous in relation to the housing land supply position.

4.3 A representation supporting the earlier use of the standard methodology is recommended to be made. The current Local Plan is not out of date, and the proposed transition arrangements might not allow the Council (and its Greater Norwich partners) to move to the new housing needs numbers, even if they would disclose a lower level of need in relation to the five-year land supply (the new approach would eliminate the current backlog, which is a significant part of the reason there is no five-year land supply in the NPA).

Statement of Common Ground

4.4 There are no strong objections to the proposed requirement to prepare a Statement of Common Ground as the GNLP progresses. The work done on the Norfolk Strategic Framework (considered at the 9th October 2017 Cabinet) is thought highly likely to meet the main requirements of the SCG, although the Council would still need to work with various Suffolk councils to ensure that cross-boundary issues have been adequately addressed.
Planning for a mix of housing needs

4.5 Apart from a few simple suggestions (see Appendix 1 for the draft answer), there are no major concerns about this section, and changes are unlikely to cause the Council any significant problems.

Neighbourhood Planning

4.6 As stated in paragraphs 3.12-3.13, and covered in more detail in Appendix 1, there are some significant concerns about this section. Whilst neighbourhood planning is here to stay, and is fully supported by the Council, there are various practical concerns about the proposed measures. In particular, they are felt to run the risk of over-simplifying what is in reality a complicated matter – where future growth should go, and how much of it there should be. Local Plans have to balance the various options and weigh up the evidence base in distributing and allocating housing numbers across the district.

4.7 However, if the Government is intent on carrying this approach forward, fixing numbers in relation to parishes would risk an overall under-supply of housing across the area, unless parish numbers were boosted by about 20% each, to allow for flexibility for constraints in some parish areas (i.e. some parishes may not be able to accommodate their apportioned need due to constraints). It might also threaten the ability of Local Plans to allocate housing numbers according to a different distribution strategy to the one previously/currently practised (e.g. if a more dispersed strategy was proposed in the GNLP compared to the more concentrated approach in the JCS).

4.8 A further point worth making is that all growth comes with infrastructure requirements. A simple sub-division of housing needs numbers on a parish basis is not particularly helpful in the assessment of the infrastructure requirements to support housing growth, and whether, when and how such infrastructure needs could be met.

Viability assessments

4.9 The proposed approach to simplify viability assessments, and open them up to greater transparency, is warmly welcomed. The main point that is proposed to be made is to clarify (through legislative changes, if necessary) that Councils should be able to recharge applicants the costs of independently assessing any viability appraisals submitted with planning applications, which can cost many thousands of pounds (at present, some developers claim such recharges are unlawful).
Planning fees

4.10 The introduction of the standard 20% uplift to planning fees is now well overdue: it should have taken place in July 2017, and pressure should be maintained on the Government to introduce as soon as is practicable. However, it is worth noting that this is not as generous an increase as it first appears: there have been no increases to national planning fees for more than five years. If fees had increased by the Retail Prices Index (RPI) rate of inflation over this period, it would (cumulatively) total about 12.5%.

4.11 Various potential criteria for determining those authorities who should qualify for a further 20% uplift in fees are included in Appendix 1, but it is considered very important to also emphasise to the Government that there should be a commitment to a more regular (probably annual) increase in planning application fees. The next increase (after the 20% uplift later this year) should therefore happen much more frequently than that, to give councils greater long-term certainty of future fee rates.

Next steps

4.12 Paragraph 6 of the consultation document says that the Government aims to reflect quickly on the responses received to the consultation (as well as responses to the earlier HWP consultation), and publish a draft revised NPPF “early in 2018” for a short period of consultation. Following consideration of responses, a revised updated NPPF is planned to be published in spring 2018.

4.13 The Regulation and Planning Policy Committee considered the draft response to the current consultation at their meeting on 18th October 2017, and a number of modifications were made to this paper and the full response (Appendix 1) as a result. They agreed with the thrust of the proposed response, and, in particular, acknowledged the benefits, but also the drawbacks, of the proposed standard housing needs methodology. The Committee, whilst supportive of Neighbourhood Planning, also shared officers’ concerns about the potential implications of districts potentially having to provide housing numbers for all parished areas.

5 Risks and implications arising

5.1 There will be no direct financial impact on South Norfolk in responding to the current consultation, but some of the changes proposed could have significant financial implications for the Council (most notably, planning fee increases).
5.2 There will not be any direct impact on disadvantaged groups in preparing this response, but as outlined in the report, some of the changes could lead to some major implications for disadvantaged groups, such as increased access to affordable housing.

5.3 There are no direct environmental implications, but the implementation of the consultation paper’s measures will clearly have major environmental impacts. Future legislation and policy changes will reflect these, through amendments to the NPPF.

5.4 It is not considered that there will be any impacts on crime and disorder.

6 Other options

6.1 Cabinet could decide to make amendments to the draft consultation response before it is finalised and sent to the Government.

7 Recommendation

7.1 Cabinet is recommended to
   i) Agree the proposed South Norfolk Council response (set out in Appendix 1); and
   ii) Delegate authority to the Director of Planning and Environment, in consultation with the Cabinet Member for Economy and External Affairs, to agree the precise text of the final response and submit these by the closing date of the consultation.

Appendix 1 – Draft response to Planning for the right homes in the right places
Appendix 1 – Draft Full Response

South Norfolk Council’s response to the Government’s consultation on planning for the right homes in the right places

The consultation document includes 19 questions. South Norfolk Council’s responses to each question are set out in turn below.

Question 1(a)
Do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?

The principle of a simplified approach is sensible, for the reasons set out in the consultation document. However, there are a number of areas where further guidance and/or consideration needs to be given. In no particular order, they are:

i) Local Plans need to look forward at least 15 years from the date of adoption, but the consultation document makes no mention of how housing need should be considered for years 11+. Should it be assumed that the adjustment factor will result in house price:income ratio falling to 4 or below by Year 10 (unlikely in areas with a high ratio)? That the ratio will remain exactly the same (which would surely defeat the object of the approach to boost housing delivery)? If somewhere in between, what would reasonable assumptions be as to how this would be expected to change? Unless covered in the methodology, there is the danger that a focus for disagreement and considerable extra work will simply move to the assessment of housing need numbers for years 11+ in the context of Local Plan preparation and examination;

ii) The consultation document makes no mention of the need to add in a buffer to ensure choice and competition. Whilst the need for a buffer is currently included in the NPPF, and this is presumed to stay in the revised NPPF, there is the danger that unless this is stated clearly in the approach, some non-professionals may conflate the housing need number (i.e. Objectively Assessed Need, OAN) for the Local Plan housing number (i.e. OAN plus any economic growth assumption plus buffer);

iii) The proposed approach to joint working (paragraphs 30-32) is supported. However, there may be areas where a housing market area (HMA) covers such a number of individual local authority areas that it is impractical to prepare a single Local Plan covering the whole area. For example, the Central Norfolk HMA (snapped to LA boundaries) covers five districts; the Greater Norwich authorities (Broadland, Norwich and South Norfolk) are preparing a combined Greater Norwich Local Plan, whilst Breckland and North Norfolk districts are preparing separate Local Plans.

Question 1(b)
How can information on local housing need be made more transparent?

This information should be published by the Government annually on a national basis, at the same date each year, in a similar format to the ‘housing needs consultation data table’ which was published alongside the Government’s current consultation. This certainty would allow all involved in the consideration of housing needs numbers to understand when the updated numbers will be published each year, and plan accordingly.

Question 2
Do you agree with the proposal that an assessment of local housing need should be able to be relied upon for a period of two years from the date a plan is submitted?

No. South Norfolk Council considers that it is very important that this point is “fixed” at an earlier stage in the plan-making process. Otherwise there is the danger that, if updated needs information
is published shortly prior to the submission date, many councils will fear a challenge to the housing needs numbers if they press on regardless (to try to get the Local Plan in place as soon as possible) with the “old” numbers. At the very least, councils should be able to “freeze” the basic OAN number once they have published the Regulation 19 pre-submission document for public representations, but ideally it should be earlier than this in the process, to allow a smoother preparation of the Regulation 19 document.

Councillors should be able to rely upon an assessment of housing need for a period of three years from the date a ‘pre-submission’ plan is published. This will ensure that there is greater certainty for all involved in the plan-making process as to the number of homes that are required, in case of unexpected delays in the plan-making process later.

**Question 3**

Do you agree that we should amend national planning policy so that a sound plan should identify local housing needs using a clear and justified method?

Yes. South Norfolk Council agrees with this proposal, which would make scrutiny of the Local Plan process more straightforward for stakeholders.

**Question 4**

Do you agree with our approach in circumstances when plan makers deviate from the proposed method, including the level of scrutiny we expect from the Planning Inspectors?

Yes, in general. South Norfolk Council agrees with this proposal, in particular the assumption that that a higher level of growth than OAN should be assumed to be sound by an Inspector. However, it should be made clear that the “policy-off” OAN (arrived at using the standard methodology) should be the figure that it used for calculating the five-year land supply need against, with any “policy-on” assumptions (plus a buffer) added in to reach the Local Plan housing figure.

Where an alternative method is proposed, however, there may be some logic to the Planning Inspectorate providing a level of challenge before the Local Plan is subject to the pre-submission representations period and submission itself. This is to minimise the potential for an inappropriately-justified methodology reaching the examination stage, with all the costs and delays that could be caused if significant further work is needed to deliver a “sound” Local Plan (suspension of the examination, compilation of new evidence, further consultation etc).

**Question 5(a)**

Do you agree that the Secretary of State should have discretion to defer the period for using the baseline for some local planning authorities? If so, how best could this be achieved, what minimum requirements should be in place before the Secretary of State may exercise this discretion, and for how long should such deferral be permitted?

South Norfolk Council disagrees with the proposal that after 31 March 2018 the new method for calculating the local housing need will apply as the baseline for assessing the five year housing land supply; given the significance of recent consultations (on the Housing White Paper, this current consultation, future CIL announcement in November 2017, the proposed draft revised NPPF to be published in spring 2018 etc) there is a significant amount of uncertainty for plan-makers at present, and a later date is appropriate (at least 30 September 2018). The Council agrees that the SoS should have discretion to defer the period for using this baseline, and this discretion should be applied if a local authority can provide demonstrable evidence that it is making timely progress with a Local Plan review (e.g. evidence of recent consultations etc).

**Question 5 (b)**

Do you consider that authorities that have an adopted joint local plan, or which are covered by an adopted spatial development strategy, should be able to assess their five-year land...
supply and / or be measured for the purposes of the Housing Delivery Test, across the area as a whole?

Yes. South Norfolk Council (as partner in a joint Local Plan originally adopted in 2011, and currently preparing a new joint Local Plan, the Greater Norwich Local Plan) agrees strongly with this suggested approach. This should come into effect at the earliest possible time following the close of this consultation period.

Question 5 (c):
Do you consider that authorities that are not able to use the new method for calculating local housing need should be able to use an existing or an emerging local plan figure for housing need for the purposes of calculating five-year land supply and to be measured for the purposes of the housing delivery test?

Yes. As an example, the Broads Authority (part of which falls within South Norfolk district) should be able to use its emerging Local Plan figure.

Question 6:
Do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?

Whilst a transitional approach is sensible, it also needs to enable a balance to be struck between using figures in existing adopted Local Plans (which may, like in Greater Norwich, date from 2013 or 2014 and therefore be based on need evidence from earlier than that) and applying, up-to-date evidence of need (from the new standard methodology). This could have the effect of “penalising” those authorities where up-to-date evidence shows that “current” OAN (not necessarily Local Plan housing numbers) is below “old” OAN.

Question 7 (a):
Do you agree with the proposed administrative arrangements for preparing the statement of common ground?

Yes. However, whilst HMAs are the logical geography over which an SCG should be first considered, there may well be other strategic planning matters that go beyond these areas (major roads and rail links, for example), so it will be important to ensure that meaningful engagement happens with consultees in adjoining HMAs.

Paragraph 73 refers to the need for statutory consultees to engage effectively in the plan-making process. This is critically important, and it is vital that there are additional powers to require some of these, particularly privatised utilities companies and Network Rail, to engage more effectively than has sometimes been the case hitherto.

Question 7 (b):
How do you consider a statement of common ground should be implemented in areas where there is a mayor with strategic plan-making powers?

Not directly relevant to South Norfolk Council.

Question 7 (c):
Do you consider there to be a role for directly elected mayors without strategic plan-making powers in the production of the statement of common ground?

Not directly relevant to South Norfolk Council.
Question 8:
Do you agree that the proposed content and timescales for publication of the statement of common ground are appropriate and will support more effective co-operation on strategic cross-boundary planning matters?

South Norfolk Council is a partner in the emerging Norfolk Strategic Framework (NSF), a document produced jointly by all nine Norfolk LAs (with assistance from other bodies) to demonstrate effective engagement on strategic planning issues. The Council would not want to have to re-invent the wheel and do unnecessary work on SCGs, so would ask that there is some way of recognising the existence of documents such as the NSF where they are already in place.

Question 9 a):
Do you agree with the proposal to mend the tests of soundness to include that:
i) plans should be prepared based on a strategy informed by agreements over the wider area; and
ii) plans should be based on effective joint working on cross-boundary strategic priorities, which are evidenced in the statement of common ground?

The Council generally agrees with this, but it is unclear how the strategy will be agreed, and what consultation could be undertaken to inform this (particularly in circumstances where plan-making timescales are misaligned). There is also some concern that delays agreeing the Statement of Common Ground could delay the plan-making process. The Norfolk Strategic Framework is a good example of how this process could work effectively (see also the answer to Question 8 above).

Question 9 b):
Do you agree to the proposed transitional arrangements for amending the tests of soundness to ensure effective co-operation?

Yes, this is supported – this ought to give sufficient time for LAs to engage effectively with each other to agree and produce the SCGs.

Question 10 a):
Do you have any suggestions on how to streamline the process for identifying the housing need for individual groups and what evidence could be used to help plan to meet the needs of particular groups?

The guidance for preparing Strategic Housing Market Assessments (SHMAs), as well as the NPPF, should be amended to make clear the identification of housing needs for different groups. Close working with County Council/Unitaries to get a better understanding of the needs for care and retirement accommodation will be especially important.

Planning Policy for Traveller Sites could also usefully be amended/amalgamated into the NPPF, to make clearer how work-related nomadism and other factors should be assessed in the determination of whether a Gypsy/Traveller “counts” as such for planning purposes; some claiming Gypsy & Traveller ethnicity, but who do not travel for work-related reasons, still seek broadly equivalent accommodation (i.e. a pitch for a caravan and associated elements).

Whilst being imperfect, the best measure of custom-build and self-build demand is likely to be the numbers on a council’s Self-Build Register, although there is no reason that many self-build and custom-build houses could not be built on normal housing allocation sites (particularly smaller ones).
Question 10 b):
Do you agree that the current definition of older people within the National Planning Policy Framework is still fit-for-purpose?
Yes.

Question 11 a):
Should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?

This is a difficult issue, and the Council’s view is that it should probably not. Many Local Plans covering non-urban areas do not necessarily make allocations on a parish boundary basis, but on a settlement basis. It is often the case that a large rural parish may only have one or, perhaps, two settlements with any level of services; allocations would more normally be made in a Local Plan on a settlement basis (consistent with a settlement hierarchy) than a parish basis. An emerging Local Plan will likely need to make allocations in most/all suitable parishes (consistent with the emerging settlement hierarchy and Sustainability Appraisal), because it may not be safe to assume a Neighbourhood Plan would necessarily come forward or continue to completion in that parish.

For this reason, requiring an emerging Local Plan to set out housing figures for neighbourhood areas and parishes would be fraught with difficulty, and would run a significant risk of causing major complications in the production of the Local Plan. At best, it could cause delays (possibly significant) as there is discussion (and potential disagreement) about appropriate levels for particular parishes; at worst, a Local Plan could run into major SA difficulties if there was serious doubt about whether the choice of sites and housing numbers was “the most appropriate” (or even “an appropriate” strategy).

Applying the proposed standard formula to discern the starting point for housing needs in neighbourhood planning areas appears attractive and straightforward at first glance. However, there are a number of difficulties with the approach set out in paragraph 99:

i) It could not take account of any existing, committed growth in a parish (i.e. housing allocated and/or permitted, but yet to be built);
ii) It could not take account of any constraints to growth (say, Green Belt, flood risk etc) in the parish;
iii) It could not take into account any historic restrictions to growth applied through current/previous Local Plans – for example, a focus on certain other settlements or parts of the district for good planning reasons, or simply a lack of interested landowners putting sites forward. It might also not (depending on timing) reflect a change in approach in an emerging Local Plan in relation to distribution options. For example, a previous (current) Local Plan might have had a strong focus on particular brownfield sites, and/or settlements (perhaps linked with large employment growth areas). An emerging Local Plan might wish to take a more dispersed approach to growth, to provide more small sites in a wider range of locations as an aid to SME builders and to boost delivery, but the application of a simple population-based formula could not allow for this. Similarly, a proposal for “new town” in a rural area (or areas) might not work on this basis either.

The danger of this approach is therefore that a housing need figure is produced mechanically for a parish, but that the emerging Local Plan has to reach its own judgement of an appropriate figure (taking into account constraints etc across the whole area), which might well be higher – causing distress and frustration for the parish when their housing number is consulted on, and perhaps later adopted, by the Local Plan’s housing number.
Do you agree with the proposal for a formula-based approach to apportion housing need to
neighbourhood plan bodies in circumstances where the local plan cannot be relied on as a
basis for calculating housing need?

For this reasons given in answer to Question 11a), this is not supported. However, if, despite the
Council’s concerns about this approach, the Government is intent on taking it forward, it is
suggested that any housing need number for an emerging Neighbourhood Plan area or parish
should use the proposed “current proportional population” approach set out in paragraph 99 – but
add a minimum of 20% to the total. This would then be the “starting point” for the parish’s housing
need, and would have the twin benefits of boosting delivery of housing in neighbourhood plan
areas, whilst adding robustness and buffers to the overall numbers in a district where there may
be constraints in some areas preventing the normal minima from being met.

Where there are significant areas of a district which are highly constrained, the proposed approach
is even more problematic; it would not be possible for neighbourhood plans in these areas to meet
their housing need, based on the ‘apportionment’ approach. This could therefore lead to a shortfall
in the provision of homes across the district. The only sensible approach in this case would be for
housing numbers to be left entirely to the Local Plan to distribute, with Neighbourhood Plans
indicating instead preferred locations of housing growth rather than exact numbers of sites.

Do you agree that local plans should identify the infrastructure and affordable housing
needed, how these will be funded and the contributions developers will be expected to
make?

Yes. This approach is essentially the same as existing. However, in order to make it work as
effectively as possible, detailed longer-term engagement from utilities providers will need to take
place; too often, near-complete certainty of costs (say from a water and sewerage company) can
often only be provided 5-8 years ahead, due to the nature of the legislative and regulatory regime.
This can make it difficult for LAs to understand what some of the infrastructure costs might be,
especially on larger sites or those planned to come forward later in the Plan period, raising viability
concerns when some of these sites come forward later through planning applications.

In reviewing guidance on testing plans and policies for viability, what amendments could
be made to improve current practice?

See the answers to questions 14-16 below

Do you agree that where policy requirements have been tested for their viability, the issue
should not usually need to be tested again at the planning application stage?

Yes, in principle, although clearly the longer the time-gap between the Local Plan being adopted
and sites coming forwards, the greater the chance of various costs and values changing in a way
that might legitimately impact viability (construction industry costs, for example). Viability
information should be required at the application stage only if the applicant claims that they cannot
deliver key policy requirements (such as an appropriate level of affordable housing).
This may require a much greater understanding of site specific costs. Otherwise, there is a risk of
economic inefficiencies. An inflexible area wide approach could lead to lower (lowest
denominator) overall policy requirements and super profits/land receipts on the most viable
sites. Guidance should expect land values to fall where there are ‘exceptional’ costs.
Viability assessments could be simpler and quicker by introducing a standardised method for sampling local values and costs would help. The existing PPG, Harman and RICS guidance leaves a lot open to judgement and debate.

Where the LPA needs to assess the contents of a viability report, perhaps through an independent expert (such as the District Valuation Service), legislation/guidance should make clear (after being altered, if necessary) that LPAs can legitimately recharge the costs to the applicant – in too many cases, developers have tried to argue that LPAs cannot lawfully recharge this cost to them.

**Question 15:**
How can Government ensure that infrastructure providers, including housing associations, are engaged throughout the process including in circumstances where a viability assessment may be required?

The Government can help to ensure that infrastructure providers are engaged through the process by requiring regular Infrastructure Delivery Plan reviews and consultation with those bodies. It may be appropriate to align infrastructure planning timescales for all stakeholders. This could mean consistent business plan/infrastructure plan review dates and time horizons. We are currently in a position where infrastructure plans are for 20 years, whilst utilities business plans only cover the next 5 years and do not account for planning development unless it has permission.

There is a relatively simple answer to this: all key infrastructure providers, including housing associations, should become subject to the Duty to Co-operate. This has long been sought by many LPAs, and the Government should take action, through legislation if necessary, to make this happen. The NPPF and PPG should be updated also to reflect the importance of this engagement to LPAs.

**Question 16:**
What factors should we take into account in updating guidance to encourage viability assessments to be simpler, quicker and more transparent, for example through a standardised report or summary format?

- Essential to improving viability is bringing forward a non-attributable national build cost database. The RICS BCIS index is currently optional and often unpopulated by the volume builders that are most able to drive costs down through bulk buying power.
- Much clearer guidance is required on land release values. There is a current PPG tension between two methods but the Council recommends the former:
  - Uplift against existing use values
  - What was paid for land nearby.

**Question 17 (a):**
Do you agree that local planning authorities should set out in plans how they will monitor and report on planning agreements to help ensure that communities can easily understand what infrastructure and affordable housing has been secured and delivered through developer contributions?

Yes, these could be set out in Authority Monitoring Reports, which must already be produced and published on councils’ websites on an annual basis.

**Question 17 (b):**
What factors should we take into account in preparing guidance on a standard approach to monitoring and reporting planning obligations?
Each report should cover a single financial year only and contain information on all receipts and spending, plus the developments that they relate to. They will need to be clear as to which stage of the process the developments referred to are at; for many sites, this information will need to be recorded over a number of years (outline consent; reserved matters consent; when triggers requiring particular S106 payments have been met (at a certain threshold of housing completions, for example).

To avoid the process becoming an expensive and involved paper-chase for LPAs to produce, it would be sensible for a minimum threshold of development to be included, to be monitored in detail: perhaps 50 dwellings. All other, smaller, developments, could be grouped together for simplicity’s sake.

Question 17 (c):
How can local planning authorities and applicants work together to better publicise infrastructure and affordable housing secured through new development once development has commenced, or at other stages of the process?

Press releases, local newspapers, digital bulletins and newsletters, Council and housebuilders websites, signage at development sites, developer roadshow briefings and information packs to all residents are all potential options. In particular, signage at development sites could indicate the total numbers of completions (market and affordable) both in the current (financial) year and overall at the development and would be strongly encouraged (accepting that there can be differences of opinion as to when exactly a “completion” can be said to have occurred).

Question 18 a):
Do you agree that a further 20 per cent fee increase should be applied to those local planning authorities who are delivering the homes their communities need? What should be the criteria to measure this?

The first point to make here is that the 20% increase planned to come in by the end of the year is badly overdue. It has been five years since the last national increase, and the continued delays in implementation during 2017 has been very frustrating for all planning authorities. Had there been annual increases at the level of RPI inflation over that period, fees would have risen by about 12.5% - still well below a level closer to fuller fee recovery, but at least something. The planned 20% increase, and the potential additional 20% on top of this, therefore needs to be seen in this context (i.e. not being quite as significant an increase as perhaps is being portrayed).

The further 20% fee increase is welcomed, this should also take account of constraints. Whilst LPAs are a very important part of the process – allocating sites, granting consents, discharging conditions etc – housebuilders actually build most of the homes in the country. Many councils build what they can themselves, and so do housing associations, but at present the private sector is the dominant delivery partner.

In Greater Norwich, for example, there has been a very significant increase in consents and commitments in the past 3 or 4 years, helped by the adoption of various Local Plan documents, but this has not – at least yet – been met by a similar increase in house completions. If councils are doing their bit by granting the consents needed, then an additional 20% fee increase could potentially help them by assisting in the speeding-up of discharging of consents, and, more importantly, to enable them to assist in the forward-funding of some on-site infrastructure to de-risk sites.

Question 18 b):
Do you think there are more appropriate circumstances when a local planning authority should be able to charge the further 20 per cent? If so, do you have views on how these circumstances could work in practice?
Those authorities which:

i) have an up-to-date Local Plan and are working on a replacement Local Plan; and

ii) have consistently maintained a bank of commitments (allocations and/or consents) which is more than equal to their housing needs, as distinct from a 5-year land supply (which is not entirely within their control); and

iii) are performing in the top 50% of LPAs in their Development Management performance statistics for major and minor developments (on a rolling two-year basis).

**Question 18 c):**
Should any additional fee increase be applied nationally once all local planning authorities meet the required criteria, or only to individual authorities who meet them?

It should be applied to individual authorities. However, special consideration should be given to some authorities whose income overall is not sufficient to enable them to invest enough in their planning service (perhaps because of low viability, low council tax and low business rates income), for whom an additional 20% income could be the only way of enabling them to invest more to improve their service.

**Question 18 d):**
Are there any additional issues we should consider in developing a framework for this additional fee increase?

There should be longer-term certainty about the likelihood of additional fee increases being allowed, not just the additional 20%, but whether future annual increases will be planned for (perhaps at RPI or CPI rates of inflation). Councils have found recent short-notice changes (cuts) to the New Homes Bonus regime very difficult to deal with; this is inimical to good, sensible long-term financial planning.

**Question 19:**
Having regard to the measures we have already identified in the housing White Paper, are there any other actions that could increase build out rates?

Further enhancements/simplifications to the compulsory purchase regime, to enable councils to purchase “stalled” sites at sensible values and either build out themselves, or parcel out to SME developers, should take place.
Cabinet 30 October 2017
Agenda Item 10

Housing Support and Regulation
Strategy and associated Policies

Report of the Policy, Partnerships and Delivery Manager
Cabinet Member: Yvonne Bendle

CONTACT
Tony Cooke 533754
tcooke@s-norfolk.gov.uk
1. Introduction

1.1 The Housing Support and Regulation Strategy (HSRS) and associated policies are supplementary documents to the South Norfolk Housing Strategy. Linked to the priorities of the Council, they provide an overview of South Norfolk Council's approach to improving residents' lives through its role as a Housing Authority.

1.2 The HSRS is primarily a technical document that explains the Council's approach to supporting residents to remain in their homes through advice and support services, and the Council's approach to maintaining the quality of homes including enforcement activity within the housing sector and its work to minimise the number of empty homes.

1.3 The document outlines the overall approach and includes a series of appendices which provide more detailed policy information on the assistance outlined in the main document, providing clarity for landlords, managing agents, homeowners and tenants. The Regulatory Reform Act 2002 (see paragraph 2.1) requires the Council to publish the details of the support and assistance it provides, and by including this in the HSRS the Council is also ensuring a consistent and clear approach across the range of housing related functions it is responsible for. It will help ensure the housing sector in South Norfolk meets the needs of our most vulnerable customers and the Council to discharge its statutory duties and functions.

1.4 The Housing, Wellbeing and Early Intervention Policy Committee has considered the document and recommended that it be taken to Cabinet for approval.

2. Background

2.1 The Regulatory Reform (Housing Assistance England and Wales) Order 2002, made under the Regulatory Reform Act 2001 came into force on 18 July 2002. As a consequence, the Council's powers to provide renovation grants and home repair assistance were revoked on 18 July 2003 and replaced with a system under which councils are enabled to provide a wide variety of assistance to home owners and residents.
2.2 Housing Authorities have a general power to give financial assistance for home repair, improvement and adaptation. This power is not restricted, aside from the fact that authorities must have regard to guidance which sets out overarching principles such as the need to be fair and to:

2.2.1 Give priority to the most vulnerable households;
2.2.2 Ensure that applicants for loans are properly advised; and
2.2.3 Take realistic account of people’s ability to contribute.

2.3 Councils are required to publish a policy detailing how it will exercise its powers and discharge its duties. The Housing Support and Regulation Strategy details that information.

3. Proposals – the Housing Support and Regulation Strategy

3.1 Parts one to six of the report explain the context of the document in terms of legislation, national policy, evidence base, ambitions for our residents and communities and our approach to our housing and wellbeing related services.

3.2 Part seven provides more detail of the services South Norfolk delivers and how those services and those provided by our partners link together to provide a comprehensive service for our residents.

3.3 Part eight provides detail of the financial assistance and support South Norfolk has made provision for, with details of the schemes, the purpose of the funding and eligibility criteria.

3.3.1 Disabled Facility Grants
3.3.2 Gaining Independence Grants
3.3.3 Forget-Me-Not Grants
3.3.4 Supporting Independence Service (Handyperson)

3.4 Part nine provides details of the main legislation South Norfolk is responsible for and how the Council will discharge its enforcement duties. In recent times the Government has introduced a raft of new legislation intended to help regulate the rented
sector as well as new powers to impose penalty charges to recover the cost of the regulation duties. The HSRS enables the Council to exercise those new powers.

3.5 Parts ten to thirteen explain the performance, governance and monitoring arrangements.

4. Risks and implications arising

4.1 The Council is required to publish details of the support it provides to residents and how it will discharge its enforcement responsibilities. Failure to publish the details could lead to risk to reputation in the event of a complaint to the ombudsman or challenges to enforcement action.

4.2 The Financial support offered is costed within the budget or will there be an impact?

4.3 The measures and services in this strategy do not adversely impact any of the protected characteristics as specified in the Equality Act 2010.

4.4 Measures and services in this strategy will have a positive impact on the environment.

4.5 Measures and services in this strategy will have a positive impact on crime and disorder.

5. Recommendation

5.1 The Cabinet approve the Housing Support and Regulation Strategy, subject amendments as agreed by Cabinet to be included as an addendum to the South Norfolk Housing Strategy 2016-2019.
1. Purpose of the strategy

1.1. This document acts as an appendage to the South Norfolk Housing Strategy 2016-19, underpinning all activity taken by the Council and partners within the district in relation to its function as a Strategic Housing Authority.

1.2. The purpose of the document is to provide an overview of the Council’s approach to supporting, maintaining, improving and adapting the built housing stock, including details of the support and assistance available for vulnerable residents and home owners, who is eligible to receive it and how the Council will exercise its enforcement and regulation powers when necessary to do so.

1.3. The assistance and support provision outlined in this strategy aims to provide appropriate practical and cost-effective advice and support to all home owners and residents, providing higher levels of support and assistance to people most at risk of losing their independence (see figure 1). It considers the health and wellbeing of residents and brings together all forms of grant, support and action available to the Council, both mandatory and discretionary.

1.4. The enforcement provisions are intended to prevent, detect and control risks to the health, safety and wellbeing of our residents and to ensure the viability of legitimate businesses are not put at risk by poor or unlawful practices within the housing sector.

2. Introduction

2.1. The vision of the South Norfolk Housing strategy is:

“To ensure all residents have access to and can 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”

2.2. Through this addendum, we will help deliver this vision by ensuring the quality and suitability of housing and residential accommodation in South Norfolk meets resident’s needs, allows them retain or regain their independence, sustain their health and wellbeing and provides a base from which to prosper.

2.3. There are direct links between poor housing and poor health particularly in older people, residents with disabilities or chronic illness and households with young children.

2.4. The Council has a statutory responsibility to deal with housing that is in poor condition or needs adaptations to meet the needs of those with disabilities and vulnerabilities. The Council’s partners are under a duty to work with the Council to prevent the threat of homelessness.
3. Aim

3.1. This strategy aims to align all activity that seeks to improve the quality and suitability of housing for residents. This includes a range of services both statutory and discretionary including:

3.1.1. Disabled Facilities Grants
3.1.2. Other grant provision and financial assistance
3.1.3. Support and advice
3.1.4. Enforcement activity
3.1.5. Licensing
3.1.6. Tackling empty homes

4. Legislation and National Policy

4.1. The activity within this document is underpinned by legislation relating to the Council’s statutory housing duties.

4.2. The Disabled Facilities Grant (DFG) was introduced as part of the 1989 Local Government and Housing Act. Under this legislation local housing authorities have a statutory duty to provide grant aid to disabled people for a range of adaptations to their homes. Details of the DFG are contained in Appendix 1a.

4.3. The Council receives funding for DFG’s from Central Government through the Better Care Fund. The Integration and Better Care Fund Policy Framework 2017-19 requires the ring fenced DFG element of the BCF to be passed to Housing Authorities in full, unless otherwise agreed. Joint plans are developed with Norfolk County Council and the Clinical Commissioning Groups to focus on the four national priorities of the BCF which are;

4.3.1. Delayed transfers of care/hospital discharge
4.3.2. Non-elective admissions (general and acute)
4.3.3. Admissions to residential and care homes
4.3.4. Effectiveness of re-ablement

4.4. The Regulatory Reform (Housing Assistance England and Wales) Order 2002, which was made under the Regulatory Reform Act 2001 came into force on 18 July 2002. Council’s powers to provide renovation grants and home repair assistance were revoked on 18 July 2003 and replaced with a system under which councils are enabled to provide a wide variety of assistance to home owners.

4.5. Housing Authorities have a general power to give financial assistance for home repair, improvement and adaptation. This power is not restricted, aside from the fact that authorities must have regard to guidance which sets out overarching principles such as the need to be fair and to:

4.5.1. Give priority to the most vulnerable households;
4.5.2. Ensure that applicants for loans are properly advised; and
4.5.3. Take realistic account of people’s ability to contribute, including to equity release loans.

4.6. Councils are required to give assistance under these powers in accordance with a published policy. To ensure that the assistance given is targeted effectively, councils have the power to carry out tests of financial resources and to charge for
any labour or materials they provide, should they wish to do so. They have the power to set the conditions under which any financial assistance should be repaid and the period over which those conditions should apply. Where they chose to give a loan or to attach conditions to a grant or loan, councils have the power to waive any requirement to repay it or to reduce the amount they require to be repaid.

4.7. Using these powers the Council has introduced a Gaining Independence Grant (GIG) detailed in Appendix 1b. This is a streamlined disabled adaptation grant for where the works are of a smaller nature and the applicant is in receipt of specified benefits. It is intended as an alternative to a DFG, not a replacement, and the aim is that adaptation needs are completed within 50 working days of being identified. The Council funds these grants from the funding it receives through the Better Care fund for DFG’s.

5. Local context and evidence base

5.1. The South Norfolk Housing strategy 2016-19 underpins all activity taken by the Council and partners within the district in relation to Housing. This guidance acts as an appendage to the 2016-19 and supports the strategy outcomes of

- Providing it,
- Accessing it,
- Living in it, and
- Prospering in it.

5.2. Norfolk Better Care Fund arrangements – Each district council is jointly developing a locality plan to identify where additional value can be added by district involvement in the national BCF priorities. In South Norfolk, this includes Dementia ‘Forget-me-not’ grants, Handyperson services, Social Prescribing and our work with the Norfolk and Norwich Hospital to support hospital discharge.

5.3. The Norfolk Older People Strategy and the Norfolk Health and Wellbeing Strategy highlight the importance of housing and housing services in supporting older and or vulnerable people to maintain their independence.

5.4. South Norfolk has a high percentage of residents over 65 (23.6%) compared to the national average (18%) and this is expected to rise to 26% by the year 2020. This will result in an increase in age related conditions and disabilities. This increases demand on a range of services and on the housing stock of the district, it requires housing services and provision to adapt to manage this demand.

6. Service Delivery and Development

6.1. The Council will encourage property owners, landlords and residents to properly maintain their homes and where appropriate to do so, enable homes to be made suitable for those that need to regain or maintain their independence.

6.2. Services designed to stop a further decline in independence or that promote independent living skills must be balanced against the immediate needs of residents and resolving existing housing problems, particularly those experienced by the most vulnerable.

6.3. Providing help to improve people’s living conditions will be achieved through a combination of:
6.3.1. Advice for individuals or sourcing help from other bodies
6.3.2. Provision of a range of advice, guidance and support services
6.3.3. Provision of means-tested financial assistance
6.3.4. The use of regulation or enforcement powers
6.3.5. Responding to opportunities to attract additional funding and resources to the area

6.4. As part of the Council’s ‘Help Hub’ Approach we seek to link people into the help they need at the earliest opportunity through working with other agencies to achieve multi-disciplinary care and support. This includes working with Early Help Partner as well wider public, voluntary and private sectors to maximise the benefits to customers.

6.5. South Norfolk Council will continue to work in collaboration with partners to achieve the service objectives. The Council will work with Health and Social Care partner services to establish common assessment and referral pathways to ensure an effective multi-disciplinary approach.

7. Practical Assistance and Advice

7.1. There are a number of key service themes and areas within South Norfolk Council which form the basis of our work to ensure satisfactory quality within the housing sector.

7.2. Help Hub - Each of the service areas outlined are part of the South Norfolk Help hub which is made up of a range voluntary and public sector agencies. Based in the Council’s offices these partners work together to provide the most appropriate help to those in need at the earliest opportunity.

7.3. Independent Living - The South Norfolk Care & Repair home improvement agency is aimed at older or vulnerable people to enable them to remain in their own homes. The service delivers bespoke advice and support, linking clients to independent advice and financial help to deal with repairs, improvement and adaptation needs. This lessens the risk of property deterioration and the risk of vulnerable persons being the victim of fraudulent surveys and rogue traders.

7.4. Integrated Housing Adaptations - Adult Social Care staff from Norfolk County Council are co-located within the Council’s Independent Living Team. Working alongside SNC officers they will determine the most appropriate adaptations to be made to customers’ homes.

7.5. Information, Advice and guidance - South Norfolk Council in addition to collaborating with partners to ensure there is a general level of advice to residents, will provide targeted advice and support those who are experiencing financial hardship. The Welfare and Debt Advisor will support customers to access welfare benefits and support they are eligible for and to deal with debt issues. The Council’s Financial Independence, Resilience, Skills and Training (FIRST) approach will help vulnerable customers gain the skills they need to manage their independence, including managing their household budgets.

7.6. Energy Advice – Working with residents, home owners, community groups and businesses to identify ways to make better use of energy and provides advice and guidance on resources available. Improving domestic energy use helps residents
remain in warm, increases disposable income, improves educational outcomes and reduces health costs.

7.7. **Handy Person** – providing a trusted service to support residents to make small scale adaptations and undertakes low level home maintenance works to ensure residents are able to maintain their independence or to keep their homes to a suitable standard. The service is open to all residents of South Norfolk and includes a subsidised service for the most vulnerable customers. Details of the service are given on Appendix 2.

7.8. **Housing Advice** - Where a person’s home cannot be made suitable for their needs or there is an identified housing need the Housing Options Team can provide advice and support on the options available. This team also deals with customers who are experiencing or are at risk of homelessness and maintains the Housing register.

7.9. **Housing Standards** - are responsible for helping ensure the housing stock meets the required standard and is suitable for the needs of occupants. Included in this area is the regulation of lettings agencies and landlords, licencing and tackling empty homes.

8. **Financial Assistance**

8.1. The above services provide a range of functions and support in relation to housing and supporting residents to remain independent. This includes the delivery of both practical and financial assistance.

8.2. The Council will provide financial assistance where appropriate through a system of grants and incentives. The aims of this are:

8.2.1. To remove people from hazards that present an immediate risk to their health
8.2.2. To adapt homes to make them suitable for people with disabilities
8.2.3. To enable people to maintain their independence
8.2.4. To improve the quality of the housing stock

8.3. The financial assistance available to South Norfolk residents consists of:

8.3.1. Disabled Facilities Grants (DFG) – To provide specialist adaptations to enable a person with a disability to live safely in their own home. Appendix 1a.
8.3.2. Gaining Independence Grant – a smaller, grant to support residents with adaptations to allow them to live independently. Appendix 1b
8.3.3. Forget me not grants to make homes dementia friendly. Appendix 1c.
8.3.4. Handy Person Service. Appendix 2

8.4. In addition to the above, the council will continue to work in collaboration with partners to bid for external funding opportunities that will benefit our residents and businesses as and when they become available.

8.4.1. The Council has used the provisions of the Energy Company Obligation (ECO) Flexible Eligibility scheme to increase the number of residents who can benefit from energy efficiency improvements to their home through the ECO scheme. The criteria used to assess eligibility for the flexible scheme is shown in Appendix 1d.
Figure 1. Structure of levels of assistance/support appropriate to need

More detailed information on the loans, grants and assistance can be found in Appendix 1
9. Regulation and Enforcement

9.1. The Council has a statutory role in ensuring the quality and suitability of dwellings in South Norfolk. We work closely with Social and Private landlords to ensure that properties within their sectors meet the required standard. The Council will where necessary undertake a range of interventions and regulation to ensure a satisfactory standard of homes and industry practice within the district.

9.2. The key focus of the Council’s activity in regards to regulation and enforcement of property condition is on the Private Rented Sector, the area where stock condition surveys suggest there is the highest prevalence of substandard accommodation. The owners of such housing have a clear responsibility to ensure the condition of their properties do not pose an unacceptable risk to the health and safety of the occupants.

9.3. The Enforcement Policy including powers and options available to the Council in exercising its responsibilities with regard to housing related legislation are appended in Appendix 3.

9.4. Housing, Health and Safety - The Housing Act 2004 introduced a Housing Health and Safety Rating Scheme (HHSRS). This imposes a duty on the Council in respect of Category 1 hazards and specific powers in respect of Category 2 hazards.

9.5. Empty Homes - Advice and assistance will be provided to help bring long-term properties back into use in a cost-effective manner. Properties that are having an adverse effect on the surrounding neighbourhood and those that can make the most effective contribution to meeting housing need will be prioritised. The Council will use statutory powers if necessary (Appendix 3).

9.6. As well as exercising enforcement and regulatory powers, the Council will seek to work in partnership with landlords and tenants to improve standards within the rented sector.

9.7. In line with its actions in the Housing Strategy the Council will provide advice support and training to landlords to help ensure the quality of accommodation in South Norfolk. Further to this as part of the DCLG Homeless Prevention Trailblazer programme the Council will trial a bespoke support and lettings offering for private sector landlords and tenants.

10. Monitoring Key Outcomes

10.1. The Council undertakes to address the key objectives identified in the Housing Strategy 2016-19. It has identified the measures that can be used to monitor its progress on each of these objectives.

10.2. These measures sit within the following key local indicators, namely:

10.2.1. The number of vulnerable people remaining in their own homes following intervention.
10.2.2. The number of properties adapted to meet the needs of disabled occupants.
10.2.3. The number of homes where energy efficiency has been improved.
10.3. These measures contribute to a range of positive outcomes for residents, partners and the wider community. For example, energy improvements result in a reduction of Carbon Dioxide emissions, improvement in air quality, an increase in disposable income, improved health and better educational outcomes.

10.4. The key outcomes relating to this document are set out in the South Norfolk Council Business plan as well as the South Norfolk Housing Strategy and South Norfolk Health and Wellbeing Strategy action plans.

11. Resources

11.1. The Council will allocate capital and revenue funding to support this strategy and regularly review its budgets in light of:

11.1.1. The response to the Council's policy
11.1.2. Changing demand for different kinds of assistance
11.1.3. The need to change the priorities of initiatives and policies.

11.2. The Council will charge fees where appropriate for its services. A fee of 15% based on the cost of the works arranged on behalf of the client, is currently charged for the users of the Care & Repair Service. The Council will consider introducing charges to offset the cost of other services such as obtaining loan help, home maintenance advice services and home surveys etc. as the services become available.

12. Governance

12.1. To ensure the services achieve the required outcomes and partners effectively contribute to the delivery of shared outcomes, activity in this strategy will be underpinned by a set of shared governance arrangements.

12.2. South Norfolk Locality Better Care Fund activity and outcome performance will be reported to the South Norfolk Early Help Hub Strategic Board.

13. Customer Feedback

The Council encourages feedback from users of our services and has an online feedback form on our website that can be accessed at

https://www.south-norfolk.gov.uk/compliments-suggestions-and-complaints
# DISABLED FACILITY GRANT

**Purpose of assistance**
- To provide adaptations, equipment and services to enable a person with a disability to live safely in their own home.

**Maximum Grant**
- £30,000
- The grant will be the difference between the applicants assessed contribution and the eligible costs up to a maximum grant of £30,000.

**Eligible Persons**
- Any disabled person, as described by the Housing Grants, Construction and Regeneration Act 1996 s. 100.
- Applicants can be property owners or tenants; some landlords may apply on behalf of tenants.

**Eligible Properties**
- A permanent and legal residence including dwellings, mobile homes or caravans and houseboats.

**Eligible Costs**
- Minimum cost of works £50
- Works that are essential for access, personal care, bedroom, kitchen, safety and services, as described in the Housing Grants, Construction and Regeneration Act 1996 s. 23
- Works must be necessary and appropriate to meet the needs of the disabled person; and
- Work must be reasonable and practicable to carry out having regard to the age and condition of the dwelling or building.
- Fees for costs and professional services in connection with the scheme
- Cost of a five-year stair lift warranty
- The eligible costs will be determined by competitive tendering in accordance with the councils standing orders or use of a contractor selected through a procurement process.

**Relevant Works**
- The Council will only consider funding an extension to a dwelling if the assessed need cannot be met by the provision of equipment and/or alterations to the property.
- The Council will only consider funding the provision of equipment and/or alterations to a dwelling if the assessed need cannot be met by re-organising the existing living space available in the property.
- The grant will only be available for the cost of works necessary for the adaptation and not to the wider fabric of the property.
- Grant will only be available towards the cost of works to meet the assessed needs of the disabled person.

**Common parts or group repair**
- The reasonable sum or proportion relating to the applicant’s liability

**Applicant Contribution**
- Applicants will be assessed for their ability to contribute to the scheme, the test of resources will be that as applied to the Mandatory Disabled Facilities Grant rules as set out under the Housing Renewal Grant Regulations 1998 (as amended).
- Where the applicant has been determined as having a contribution to make to the works, that contribution will be deposited with the Council before the works commence.

**Conditions**
- The client needs assessment will be focus on the immediate and foreseeable needs of the person to live as independently in their home as their condition will allow.
Norfolk County Council will, based on assessments of the client in their home undertaken by suitably qualified assessors, be responsible for determining clients’ needs.

The Council shall only entertain applications accompanied by the relevant certificates of owner or tenant occupation.

The Council shall only entertain applications accompanied by proof of ownership and/or owner’s permission.

In the case of owner occupiers where the grant exceeds £5000 and the works materially increase the value of the property, a local land charge will be placed on the property limited to a maximum of £10,000 which will become due if the property is sold or otherwise disposed of with 10 years of completion of the works.
## APPENDIX 1b

### GAINING INDEPENDENCE GRANT

<table>
<thead>
<tr>
<th>Purpose of assistance</th>
<th>To provide adaptations to enable a person with a disability to live safely in their own home.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Grant</td>
<td>£8000</td>
</tr>
</tbody>
</table>
| Eligible Persons                            | Any disabled person, as described by the Housing Grants, Construction and Regeneration Act 1996 s. 100, applicants can be property owners or tenants, some landlords may apply on behalf of tenants. The person must be in receipt one or more of the following benefits:  
  - Income Support  
  - Pension Credit Guarantee  
  - Job Seekers Allowance (Income related)  
  - Employment Support Allowance (Income related)  
  - Housing Benefit  
  - Council Tax Support  
  - Universal credit |
| Eligible Properties                         | A permanent and legal residence including dwellings, mobile homes or caravans and houseboats. |
| Eligible Costs                              | Minimum cost of works £50.00  
  - Works that are essential for access, personal care, bedroom, kitchen, safety and services, as described in the Housing Grants, Construction and Regeneration Act 1996 s. 23  
  - Works must be necessary and appropriate to meet the needs of the disabled person; and  
  - Works must be reasonable and practicable to carry out having regard to the age and condition of the dwelling or building.  
  - Cost of a five-year stair lift warranty  
  - Fees for costs and professional services in connection with the scheme  
  - The eligible costs will be determined by use of a contractor selected through a procurement process. |
| Relevant Works                              | The Council will only consider funding an extension to a dwelling if the assessed need cannot be met by the provision of equipment and/or alterations to the property.  
  - The Council will only consider funding the provision of equipment and/or alterations to a dwelling if the assessed need cannot be met by re-organising the existing living space available in the property.  
  - The grant will only be available for the cost of works necessary for the adaptation and not to the wider fabric of the property.  
  - Grant will only be available towards the cost of works to meet the assessed needs of the eligible person. |
### Common parts or group repair
The reasonable sum or proportion relating to the applicant’s liability

### Applicant Contribution
- The applicant will be responsible for the payment any non-eligible works undertaken at their request at the time the eligible works are undertaken.

### Conditions
- The client needs assessment will be focus on the immediate and foreseeable needs of the person to live as independently in their home as their condition will allow.
- Norfolk County Council will, based on assessments of the client in their home undertaken by suitably qualified assessors, be responsible for determining clients’ needs.
- The Council shall only entertain applications accompanied by the relevant certificates of owner or tenant occupation. The Council shall only entertain applications accompanied by proof of ownership and/or owner’s permission.
FORGET ME NOT GRANT - funded by Norfolk County Council

| Purpose of assistance | • To assist people living with Dementia and those caring for them in the maintenance of a safe, decent and warm home.  
• To prevent admission to, and aid discharge from hospital or residential care. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Grant</td>
<td>£1000</td>
</tr>
<tr>
<td>Minimum cost of works</td>
<td>£50</td>
</tr>
</tbody>
</table>
| Eligible Persons      | • Diagnosis of Dementia or likely diagnosis of dementia  
• In receipt a recognised means tested benefit – cost of works up to maximum of £1000  
• Not in receipt of a means-tested benefit – cost of works up to maximum of £500. |
| Referral route        | • GP  
• Primary care Workers  
• Community Care  
• Admiral Nursing Service  
• Self or family referral  
• Other |
| Eligible Properties   | A permanent and legal residence in South Norfolk CCG boundary |
| Eligible Works        | Works will include small-scale works following an assessment of the property such as:  
• Additional lightning in the home  
• Decorating in such a way to provide contrast to the walls and skirting boards  
• Adding signage to rooms and cupboard doors  
• Removing and installing glass fronted cupboard doors  
• Fitting memory cues, photos frames to the wall, clocks and notice boards  
• Essential repairs to remedy category one hazards  
• Essential minor improvements and adaptations  
• Home Safety and Security  
• Energy Efficiency measures where alternative home energy assistance is unavailable  
• Works to prevent unreasonable delay to the release of a patient from primary care  
• Works to prevent a relevant person being admitted to primary care |
| Delivery mechanism    | The Dementia Friendly Home is coordinated through the Care & Repair Home Improvement Agency  
A 12.5% administration fee will be charged on each grant provided by the South Norfolk Care and Repair service. This is to cover the costs of administering grant |
<p>| Conditions            | Must have lived in the relevant property for 12 months at the time of the initial enquiry and intend to remain in occupation for 5 years |</p>
<table>
<thead>
<tr>
<th>The grant will not be used to effect repairs/works that are the responsibility of a private or social landlord</th>
</tr>
</thead>
<tbody>
<tr>
<td>The grant will not be used to effect repairs/works/adaptations that can be funded through other means such as Disabled Facilities Grants.</td>
</tr>
</tbody>
</table>
**ENERGY COMPANY OBLIGATION – FLEXIBLE ELIGIBILITY**

<table>
<thead>
<tr>
<th>Purpose of assistance</th>
<th>To improve the health and wellbeing of residents by assisting households in fuel poverty and/or at risk from cold to access Energy Company Obligation (ECO) flexible funding to improve the energy efficiency of their homes.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eligible Households</td>
<td>An Owner Occupier or tenant in the private rented sector and In receipt of a qualifying low income and Living in a high cost home or A member of the household deemed vulnerable to cold.</td>
</tr>
<tr>
<td>Qualifying low income benefits</td>
<td>Housing benefit Council tax reduction/support (but not where single occupancy discount is the only reduction) Child tax credit - no income cap Working tax credit – no income cap Universal credit – no income cap</td>
</tr>
<tr>
<td>High Cost Home</td>
<td>F or G rating on Energy Performance Certificate for the property (if available) or a score of 80 above property energy use assessment</td>
</tr>
<tr>
<td>Person deemed vulnerable to cold</td>
<td>Over 65 (living at the property) (birth certificate, passport, driving licence) Pregnant woman (Mat B1 letter) Child under 5 (birth certificate) Health condition exacerbated by cold proved by: letter from GP letter from hospital eligible for free flu jab for health reasons referral from a medical professional</td>
</tr>
<tr>
<td>Referral route</td>
<td>Self-referrals Partners ECO Providers</td>
</tr>
<tr>
<td>Eligible Properties</td>
<td>A permanent and legal residence in South Norfolk</td>
</tr>
<tr>
<td>Eligible Works</td>
<td>Works will be determined by the ECO provider considering the funding available and the energy saving that can be achieved;</td>
</tr>
<tr>
<td>Delivery mechanism</td>
<td>Flexible funding eligibility will be determined by the Council who will refer eligible households to the appropriate ECO provider for survey and assessment. A referral will not guarantee the installation of measures. The ECO provider will undertake a property survey and identify what measures can be undertaken with the funding available.</td>
</tr>
<tr>
<td>Conditions</td>
<td>The landlord’s permission will be required before any measures will be installed in a privately rented property</td>
</tr>
</tbody>
</table>
## HANDY PERSON SERVICE

| Purpose of assistance | • Improve the health and wellbeing of residents and their ability to continue to live independently in their own home.  
| | • Improve the quality of life for vulnerable South Norfolk residents.  
| | • Prevent and reduce the need of other services, saving costs to the public purse.  
| Service provision | • The services of a suitably qualified handyperson/contractor for a set number of hours as per below  
| Cost of works | • The cost of the service to residents will be £20 per hour  
| | • Residents in receipt of an income related benefit and who is physically unable to carry out the works themselves will, in any twelve-month period, be entitled to two hours’ service free.  
| | • Residents not in receipt of an income related benefit, but who is assessed to not be able to carry out the works themselves, will be entitled to two hours discounted work at £10 per hour in a twelve-month period.  
| | • Unless otherwise provided from other sources, the resident will be responsible for the cost of all materials  
| Persons eligible for discounted rate | • People will be eligible for the discounted service if they are  
| | o In receipt of a specified means tested benefit and physically unable to carry out the works themselves (assessment of circumstances and long term health conditions)  
| | • The person must be in receipt of the following benefits which will be checked on the councils benefit system at the time of request for works  
| | o Pension Credit Guarantee  
| | o Housing Benefit  
| | o Universal credit  
| | • Ability to undertake the works will be assessed by interview at the time of the request for works  
| Referral route | • Self  
| | • Family members  
| | • Early Help Partners  
| | • GP  
| | • Hospital discharge team  
| Eligible Properties | A permanent and legal residence in South Norfolk  
| Eligible Works | • Handrails  
| | • Key safes  
| | • Smoke alarms  
| | • Accessibility and Safety works  
| | • Basic home improvements (works which help independence)  
| Delivery mechanism | The service will be provided by Council selected contractors  
| Conditions | The service will not undertake works that are the responsibility of a landlord.  

SOUTH NORFOLK HOUSING ENFORCEMENT POLICY

1. Introduction

1.1. This policy has been written to meet the requirements of the Legislative and Regulatory Reform Act 2006 and the Regulators’ Code, which came into statutory effect on the 6th April 2014.

1.2. The Council has a duty to follow the principles of good regulation specified in the Act and to have regard to the code when setting policies or principles that determine how it carries out its regulatory activities.

1.3. The Regulators’ Code is available online at https://www.gov.uk/government/publications/regulators-code.

1.4. The functions of South Norfolk Council covered by this policy include:

   1.4.1. Action to remove hazards in housing
   1.4.2. Regulating the management of houses in multiple occupation
   1.4.3. Licensing of privately rented accommodation
   1.4.4. Action to bring empty homes back into use
   1.4.5. Regulating the functions of landlords and managing agents
   1.4.6. Working with other regulating bodies having a responsibility for residential accommodation (e.g. the Health and Safety Executive, the Fire and Rescue Service, Trading Standards etc.)
   1.4.7. Any other regulatory function arising from the condition or management of residential premises (e.g. the Building Act 1984, the Environmental Protection Act 1990 and the Protection from Eviction Act 1977)

1.5. The overall aim of these functions is to:

   1.5.1. Prevent, detect and control risks to the health, safety and wellbeing of the occupants of privately owned houses and their neighbours.
   1.5.2. Reduce the adverse impact of empty and poorly maintained dwellings on neighbourhoods

2. The principles of good regulation

2.1. The Legislative and Regulatory Reform Act 2006 requires regulatory activities to be carried out in a way which is transparent, accountable, proportionate and consistent. It also states that regulatory activities should be targeted only at cases in which action is needed.

   Transparency

   2.1.1. We will publish and regularly update advice and guidance about our requirements and how to meet them on our website.

   2.1.2. We will also ensure that we engage with landlords, managing agents and tenants to allow them to offer views and contribute to the development of our policies and service standards. This may be through working groups, forums,
surveys, consultations or the council’s complaints, compliments and comments process.

**Accountability**

2.1.3. We will always explain why we are taking enforcement action, or carrying out an investigation.

2.1.4. Any complaints or comments about our actions or the conduct of our officers will be taken seriously and investigated. The council has an established compliments, comments and complaints process which can be easily accessed either online or by telephone.

2.1.5. In addition, there is usually a statutory right of appeal to formal enforcement action and we will always ensure that those rights are fully explained.

**Proportionality**

2.1.6. We will ensure that any action we require or take is proportionate to the seriousness of the breach and the risk to health, safety and welfare or the effect on the local neighbourhood.

2.1.7. The most serious formal action will be for serious breaches of the law where there is a significant risk to health and safety and welfare or where there has been a flagrant disregard for the requirements of the law.

2.1.8. We will seek to create an environment in which those we regulate feel able to seek advice without fear of triggering enforcement action. However, in some circumstances we will be under a duty to take action if we become aware of a breach of a failure to comply with the law or the existence of a hazard.

2.1.9. We will provide the opportunity for response to any proposed enforcement action unless that action is required to prevent or respond to a serious breach, where immediate action is required or where doing so would defeat the purpose of the proposed action. In practice this means:

2.1.10. We will give reasonable notice of inspections

2.1.11. We will consult interested parties before serving notices or orders

**Consistency**

2.1.12. We will ensure a consistent approach to our enforcement decisions.

2.1.13. We will discuss and compare enforcement decisions both within the department, and externally through liaison with other local authorities and enforcement bodies.

2.1.14. All staff undertaking enforcement duties will be suitably trained, qualified and authorised to ensure that they are fully competent to undertake their enforcement duties.

2.1.15. We will have regard to statutory guidance, tribunal decisions, case law and current research.
Targeting

2.1.16. We will target our enforcement action primarily towards those situations that give rise to the most serious risks, where the risks are least well controlled and against deliberate or organized breaches of the law.

2.1.17. Other factors also determine priorities for enforcement activity, including government targets and priorities, new legislation, national campaigns and public concerns.

2.1.18. Targeting will be based on available evidence including:

2.1.18.1. Regular stock condition surveys and modelling. For example, inspections may be targeted at premises based on their age, size or other characteristics that may make the existence of a hazard more likely.

2.1.18.2. Previous performance. For example, where a landlord or managing agent lets premises which do not comply with the law then the inspection of these and other premises owned or managed by them may be prioritised in the future.

2.1.18.3. Membership of voluntary good-practice schemes. For example, we are less likely to target premises that are managed by members of a professional lettings and management body.

2.1.18.4. Complaints from tenants or members of the public.

3. Investigation - the Council’s duties

3.1. The Housing Act 2004 places a duty on the Council to keep housing conditions in the district under review. This is normally achieved through regular stock condition surveys, stock modelling (based on a wide range of nationally-collected data) and targeted inspections.

3.2. The Council also has a duty to inspect residential premises where appropriate to determine whether a hazard to health exists. In practice this means

3.2.1. Individual premises where the occupant or someone acting on their behalf has notified us that there is a potential hazard

3.2.2. Types of premises shown to be at a high risk of being hazardous (e.g. houses in multiple occupation, accommodation above restaurants)

3.2.3. Individual premises owned or managed by people who have a record of letting other hazardous premises

4. Complaints about rented accommodation

4.1. We believe that most complaints about housing conditions can and should be resolved between tenants and landlords without our direct intervention. However, we recognise that not all tenants are aware of their rights or understand the best way to approach their landlord.

4.2. Our normal procedure for dealing with such complaints is to request tenants to make the first approach to their landlord. We help with this by providing advice and a
‘toolkit’ including letter templates. We will also contact landlords, at the tenant’s request, to let them know that there has been a complaint and to offer advice.

4.3. We will normally contact complainants after an appropriate period to see if they have managed to resolve their problem and may choose to inspect at that point if it should appear to be necessary.

4.4. Where there appears to be an imminent risk of harm or where a tenant can show that requesting their landlord to remedy a problem has had no effect then the Council may arrange an inspection immediately.

4.5. Anonymous complaints can be difficult to deal with fairly and practically and so will be investigated at our discretion.

4.6. The Deregulation Act 2015 affects a landlord’s right to evict tenants where a complaint has been made to them in writing about the premises and where the council has served a notice. Because of this, if a tenant making a complaint to us can show that they have given their landlord 14 days written notice of the problem, and that there has been no adequate response, then we will normally arrange an inspection immediately.

5. Arranging an inspection

5.1. We are usually required to give at least 24 hours’ notice of entry to the owner and occupier of the premises. However, when investigating compliance with licensing requirements or the management of houses in multiple occupation we may visit the premises without notice.

5.2. Access may be at any reasonable time, which in most cases means normal working hours between Monday and Friday. Normally we expect to give more than 24 hours’ notice and any appointment will be by agreement with the occupants and the owner of the premises. We will re-arrange inspections if given a good reason and sufficient notice.

5.3. Our officers will always carry their Council identification and a copy of their authorisation which they will show on request.

5.4. An officer who is authorised to enter may:

5.4.1. Take other persons with them
5.4.2. Bring equipment or materials
5.4.3. Take measurements, photographs or make recordings
5.4.4. Leave recording equipment on the premises for later collection
5.4.5. Take samples of any articles or substances found on the premises

5.5. We do not have the power to force entry to premises, even after service of a notice. However, if any person refuses entry without a good reason then they may be prosecuted for obstruction. We may also seek a court warrant which could allow us to enter by force if necessary.

6. Covert Surveillance

6.1. We will not generally use covert (hidden) techniques to investigate breaches of the Housing Act 2004 and related legislation.
Housing Support and Regulation Strategy

6.2. If such techniques are considered necessary, then they will be carried out in accordance with the Code of Practice on Covert Surveillance and Property Interference and the requirements of the Regulation of Investigatory Powers Act.

7. Action following investigation

7.1. Housing hazards will be identified and assessed using the Housing Health and Safety Rating System published by central government. Hazards are banded from A to J with A being the most serious. Bands A, B and C are known as Category 1 hazards with the rest being Category 2.

7.2. The aim of enforcement action is to remove the hazard or reduce it to a reasonable level. In most cases, we will consider a reasonable level to be band G or lower.

7.3. We will refer to relevant published guidance, codes of practice and case law when deciding upon the most appropriate course of action.

7.4. We will normally allow 14 days to discuss the proposed content of a notice or order with the intended recipient. This will allow that person to make alternative suggestions and to agree suitable time scales for any works to be carried out.

7.5. We may be required to inform interested persons (e.g. joint owners, mortgagees or tenants) about the action being proposed.

7.6. You can expect a notice to state what is wrong and what needs to be done to put things right.

7.7. Where immediate action is needed, an explanation of why such action is required will be given at the time and confirmed in writing in most cases within 5 working days and in all cases within 10 working days. This explanation may be contained within the notice or by separate letter.

7.8. Details of the rights of appeal against formal action will be included in any correspondence.

7.9. Where a Category 1 Hazard to health has been identified, the Housing Act 2004 requires us to take formal action.

7.10. The action taken will depend upon the severity of the hazard or offence, the most appropriate remedy and the urgency of the need for action to be taken. It must be one of the following:

7.10.1. Serving an improvement notice
7.10.2. Making a prohibition order
7.10.3. Serving a hazard awareness notice
7.10.4. Taking emergency remedial action
7.10.5. Making an emergency prohibition order
7.10.6. Making a demolition order
7.10.7. Declaring the area in which the premises are situated to be a clearance area

7.11. We may also take action for Category 2 hazards, although we will generally only do so for those that fall within bands D, E and F of the housing Health and Safety Rating system.
7.12. We will usually do this formally rather than through an informal letter. This is to ensure that there is no delay to works being carried out, to prevent any ambiguity about what the council requires and to provide the recipient with a formal right of appeal. The formal actions that we may take are:

- Serving an improvement notice
- Making a prohibition order
- Serving a hazard awareness notice
- Making a demolition order
- Declaring the area in which the premises are situated to be a clearance area

7.13. If we carry out an inspection in response to a complaint to which the Deregulation Act 2015 applies (see above) we may need to serve a notice without allowing the usual 14 days for consultation. This is to ensure that any rights that the tenant may have to protection from eviction are put in place without delay.

8. Failure to comply

8.1. A person who is believed to have committed an offence may be formally interviewed. This will be to establish the facts of the case, the person responsible for any offence and whether there are any circumstances that would influence a decision to prosecute or to impose a civil penalty.

8.2. Any formal interview will normally take place at the council offices and will be conducted under the rules of the Police and Criminal Evidence Act 1984. It will be recorded and the person being interviewed will have the right to be accompanied by a legal representative.

8.3. Where a formal interview takes place elsewhere then it will be written down in the officer’s notebook and the person being interviewed will be asked to sign it.

8.4. We may also write to you requesting information about the offence.

8.5. Where a formal interview takes place, or a written request for information relating to an investigation is issued, the following caution will be given:

‘You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in court. Anything you do say may be given in evidence’

9. Civil Penalties under the Housing and Planning Act 2016

9.1. A Civil Penalty is a financial penalty, up to a maximum of £30,000, imposed by the Council on an individual or organisation as an alternative to prosecution for the following offences under the Housing Act 2004:

9.1.1. Failure to comply with an improvement notice (section 30)
9.1.2. Offences in relation to licensing of houses in multiple occupation (section 72)
9.1.3. Offences in relation to licensing of houses under Part 3 of the Act (section 95)
9.1.4. Offences of contravention of an overcrowding notice (section 139)
9.1.5. Failure to comply with management regulations in respect of houses in multiple occupation (section 234)
9.2. We will consider the use of Civil Penalties in all cases where we are satisfied beyond reasonable doubt that an offence has been committed and whether the imposition of a Civil Penalty is in the public interest.

9.3. Whilst this will usually include all cases of failure to comply with a notice, or more serious breaches of the management regulations, it could include relatively minor breaches, for example failing to keep a garden belonging to a house in multiple occupation in a tidy condition where this is having a detrimental impact on the amenity of the area.

9.4. The level of the penalty will be determined in each case having regard to current government guidance and case law.

9.5. Our policy for imposing Financial Penalties is shown in Appendix 6 and will be published on our website; it may be revised at any time under the council’s scheme of delegations.

10. Prosecution

10.1. Prosecution may be considered where there has been a failure

10.1.1. to license a property where required
10.1.2. to comply with a licence condition
10.1.3. to comply with regulations applying to houses in multiple occupation
10.1.4. to comply with a notice or order served to remedy a hazard
10.1.5. to provide information when required
10.1.6. to comply with other relevant legislation

10.2. We will normally impose a civil penalty as an alternative to prosecution where that is an option available to us.

10.3. We will decide whether a prosecution is appropriate by consideration of the following factors: -

10.3.1. The seriousness of the offence
10.3.2. The severity and scale of potential or actual harm
10.3.3. The previous history of the premises or persons concerned
10.3.4. Whether the offence was a flagrant breach of the law
10.3.5. The explanation/defence offered by the company or individual
10.3.6. Whether false information has been supplied wilfully or there has been the intent to deceive
10.3.7. Whether inspectors were intentionally obstructed in the lawful course of their duties
10.3.8. Whether other action would be more appropriate or effective
10.3.9. Whether the landlord’s behaviour is such that it would be appropriate to apply for a banning order (which requires a conviction in court)

10.4. Investigating officers will inform the Policy and Partnerships Delivery Manager at the start of any investigations that may result in prosecution. All such cases will be regularly reviewed.

10.5. Anyone faced with being prosecuted will have the opportunity to put any matters to us that they consider may contribute to the prosecution decision being reversed.
10.6. The Courts will decide any penalty but, in the case of a successful prosecution, we will make a claim for the reasonable costs of bringing the case.

11. Simple Cautions

11.1. A simple caution may be issued as an alternative to prosecution where there is no option to issue a civil penalty. The purpose of this is to deal quickly and simply with less serious offences, to divert less serious offences away from the courts, and to reduce the chances of repeat offences.

11.2. We will follow the Ministry of Justice guidance on Simple Cautions for Adult Offenders and the Conditional Cautioning Code of Practice and associated annexes issued by the Crown Prosecution Service. The following conditions will be fulfilled before a caution is administered:

   11.2.1. The offender must be aged 18 or older
   11.2.2. There must be sufficient evidence of the offender’s guilt to give a realistic prospect of conviction
   11.2.3. The offender must admit the offence; and
   11.2.4. The offender must understand the significance of the caution and agree to being cautioned.

11.3. If a person declines the offer of a simple caution, then we may prosecute instead.

12. Works in default

12.1. Where someone has failed to comply with a notice requiring works, we may carry out those works using our own contractors. We will then be able to recover the costs of doing so, including reasonable administration costs.

12.2. Works in default can usually only be carried out after a further notice has been served by us explaining our intentions (the exception is where emergency remedial action is required although that will be followed by a notice to allow the recipient to appeal)

12.3. If you have been given notice that we intend to do works in default, you may be prosecuted for obstruction if you then do the works yourself

12.4. Details of the rights of appeal against formal action will be included in any correspondence.


13.1. These regulations allow us to impose penalty charges up to £5,000 for failure to comply with a remedial notice relating to the provision of smoke and carbon monoxide detectors in rented accommodation.

13.2. When deciding the amount of the penalty charge, we will have regard to the statement of principles shown in the Appendix 5.


14.1. Part three of these Regulations will come into force on the 1st October 2017 requiring landlords of private rented homes to ensure the homes they rent have an
Energy Performance Certificate of E or above before granting or renewing a tenancy.

14.2. These regulations allow the Council to impose a penalty for failure to comply with the regulations.

15. Property Redress Schemes


15.2. We are under a duty to enforce that requirement and may impose a penalty of up to £5,000 on any letting agency that doesn’t comply.

15.3. Current Government guidance states that a £5,000 penalty should be considered the norm and that a lower penalty should only be charged if the enforcement authority is satisfied that there are extenuating circumstances. For consistency with other Penalty Charges contained in this strategy we would impose the following fines for failure to comply.

15.4. The fine will be set at £1000 for the first offence but this will be reduced to £750 only if paid within a 14 day period.

15.5. Future fines for non-compliance served on the same landlord/agent shall be set according to the table below:

<table>
<thead>
<tr>
<th>Offence</th>
<th>Standard Penalty Charge</th>
<th>Prompt payment of reduced fine</th>
</tr>
</thead>
<tbody>
<tr>
<td>First</td>
<td>£1,000</td>
<td>£750</td>
</tr>
<tr>
<td>Second</td>
<td>£2,000</td>
<td>N/A</td>
</tr>
<tr>
<td>Third and all subsequent</td>
<td>£5,000</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Note: Discount will only be given for prompt payment for the first offence, not any subsequent offences


16.1. In some cases, the Proceeds of Crime Act 2002 allows us to seek a court order to recover the benefits of criminal behaviour which includes failure to comply with the Housing Act and similar legislation enforced by the private sector housing team.

16.2. In practice this means that a landlord may be liable to pay back all the rent collected for the premises during the time that the breach was occurring. This is in addition to any fine or other penalty that may be imposed.
17. Rent Repayment Orders

17.1. The Housing and Planning Act 2016 allows a council or a tenant to apply to the First-Tier tribunal for a rent repayment order where the landlord has been convicted, or has received a civil penalty, in relation to the following housing related offences:

17.1.1. The use of violence for securing entry to premises
17.1.2. Illegal eviction or harassment of occupiers
17.1.3. Failure to comply with an improvement notice
17.1.4. Failure to comply with a prohibition order
17.1.5. Control or management of an unlicensed house or house in multiple occupation
17.1.6. Breach of a banning order

17.2. Where a tenant makes an application, the First-Tier tribunal can order the landlord to repay up to 12 month’s rent less any Universal Credit or Housing Benefit. The Council can apply for the Universal Credit or Housing Benefit element of the rent.

17.3. We will normally expect to apply for a rent repayment order where there has been a payment of Universal Credit or Housing Benefit to tenants of the premises. Where we believe that a tenant may be entitled to make a claim, we will assist them in doing so.

18. Banning Orders

18.1. From October 2017, Part 2 of the Housing and Planning Act 2016 will allow councils to seek a Banning Order against a landlord who has been convicted of a Banning Order offence. A Banning Order will prevent a person from property letting and management, and from holding a licence for at least 12 months.

18.2. Banning Order offences have yet to be defined but are likely to relate to more serious offences.

18.3. Where we consider that a landlord’s behaviour is such that a Banning Order would be appropriate we may prosecute where an offence has been committed in preference to imposing a civil penalty.

19. Database of rogue landlords and property agents

19.1. Where a person has been

19.1.1. convicted of a banning order offence or;
19.1.2. received two financial penalties in relation to a Banning Order offence in a 12-month period

19.2. We will consider adding them to the rogue landlords and property agents’ database which is expected to become operative from October 2017.

19.3. The purpose of the database is to enable Councils to identify landlords who have been convicted elsewhere in the country to inform decisions about the imposition of financial penalties, prosecutions or whether the person is a fit and proper person for the purposes of holding a licence.
20. Charging for Enforcement

20.1. Section 49 of the Housing Act 2004 gives the council the right to make such reasonable charge as we consider appropriate as a means of recovering certain administrative and other expenses incurred by us in:

- 20.1.1. Serving an improvement notice
- 20.1.2. Making a prohibition order
- 20.1.3. Serving a hazard awareness notice
- 20.1.4. Taking emergency remedial action
- 20.1.5. Making an emergency prohibition order
- 20.1.6. Making a demolition order
- 20.1.7. Declaring the area in which the premises are situated to be a clearance area

20.2. Administrative expenses that may be charged for include:

- 20.2.1. Determining the appropriate course of action (including inspecting the premises)
- 20.2.2. Identifying actions to be specified in a notice
- 20.2.3. Serving the notice
- 20.2.4. Reviewing suspended improvement notices and prohibition orders

20.3. The charge will be calculated on the actual time spent on the case multiplied by the hourly rate for the officer carrying out the work.

20.4. Enforcement costs may be reduced or waived depending on the circumstances of the case, at the discretion of the Director Communities and Well-Being.

20.5. Where a serious Category 1 hazard is identified requiring the immediate service of an Improvement Notice, Prohibition Order or the taking of emergency action we will seek to recover our full costs.

20.6. In other cases, where the existence of a hazard would warrant the service of a relevant notice or order, the person on whom it would be served will be sent a report within 14 days clearly indicating the hazard and the proposed remedy.

20.7. That person will then be given 14 days to indicate in writing what actions will be taken to remedy the hazard (a ‘proposal’).

20.8. If a proposal is received it will be assessed using the following criteria:

- 20.8.1. Proposed time scale
- 20.8.2. Likelihood that the actions will effectively remedy the hazard
- 20.8.3. The effect that the proposal would have on any resident

20.9. If the proposal is not acceptable then a full charge will be made.

20.10. If the proposal is accepted an Improvement Notice or Prohibition Order which accommodates the proposals will be served and no charge will be made.

20.11. If, however, the notice or order is subsequently not complied with then a full charge will be made.

20.12. If no proposal is received within 14 days, the relevant notice or order will be served and a full charge made.
20.13. The sum charged will be a local land charge on the premises and, if not paid within one month, will be recovered in accordance with the powers available under the Law of Property Act 1925 which include the power to appoint a receiver.

20.14. We have a wide range of powers to recover payment of civil penalties, the cost of works in default and enforcement charges. These include:

20.14.1. Action in the County Court
20.14.2. Use of a debt recovery agency
20.14.3. Enforced sale of the premises in question
20.14.4. Appointing a receiver

21. Working with other enforcement bodies

21.1. During an investigation, an officer may become aware of breaches of legislation that is enforced by other bodies such as the Police, Fire Service, Trading Standards, Home Office, Health and Safety Executive or other departments within the Council such as Planning Enforcement or Environmental Health. In such cases, we will inform the appropriate body of the breach so that they may carry out their own investigations if they feel that to be appropriate.

21.2. We will liaise with other enforcement bodies and departments within the council to ensure effective coordination, to avoid inconsistencies, and to ensure that any proceedings instituted are for the most appropriate offence.

21.3. Any information shared will be in accordance with the requirements of the Data Protection Act 1998 and the Norfolk Community Safety Partnership protocol for the exchange of information for the reduction of crime and disorder.

22. Civil Claims

22.1. Our enforcement action is separate and distinct from civil claims made by individuals against their landlord. Enforcement is not undertaken in all circumstances where civil claims may be pursued, nor is it undertaken to assist such claims.

22.2. Upon request and, where appropriate, on payment of a fee, we will provide individuals who are pursuing a civil claim a factual report detailing our investigation and involvement in the case.

22.3. In some cases, (e.g. in the case of illegal eviction) we may assist in the process of making a civil claim or will refer the person wishing to make such a claim to a third-party (e.g. Shelter).
Appendix 5

Penalty Charges under the Smoke and Carbon Monoxide Alarm (England) Regulations 2015

1. Summary of Duties Under the Regulations

1.1. The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 requires landlords of private sector residential premises to:

1.1.1. Provide a smoke alarm on each storey of the premises on which there is a room used wholly or partly as living accommodation;

1.1.2. Provide a carbon monoxide alarm in any room of the premises which is used wholly or partly as living accommodation and contains a solid fuel burning combustion appliance; and

1.2. The landlord must ensure that alarms are in proper working order at the start of any new tenancy.

1.3. South Norfolk Council has a duty under the regulations to serve a remedial notice on a landlord where it has reasonable grounds to believe that one or more of the landlord’s requirements has been breached.

1.4. If a landlord fails to comply with a remedial notice, the council has a further duty under the regulations to arrange for the works to be carried out by an authorised person. Those works must be carried out within 28 days of the council becoming aware of the failure to comply with the notice.

1.5. Where a landlord fails to comply with a remedial notice the council has the power to impose a penalty charge of up to £5,000.

1.6. In order to do this, the council must serve a penalty charge notice on the landlord within six weeks of it becoming aware of the failure to comply.

1.7. The council has the power to reduce the penalty charge if it is paid within 14 days of the date of the penalty charge notice.

1.8. Landlords may request a review of a penalty charge notice and may appeal to the First-tier Tribunal.

1.9. The council may take proceedings to recover the penalty charge in the same way as if it were payable under a court order.

2. Statement of Principles in determining the amount of Penalty Charge

2.1. The council has a duty to publish a statement of principles to which it must have regard when determining the amount of a penalty charge. The following is the council’s statement of principles.

2.2. The Council considers that a lesser penalty will be merited on the occasion of a first offence and that prompt payment of the penalty on that first occasion should attract a reduced penalty in recognition of early admission of liability and savings in administration costs.
2.3. The level of penalty should, however as a minimum, cover the cost of all works in default, officer time, recovery costs, an administration fee and a fine.

2.4. Future offences should attract a higher penalty in view of continuing disregard for legal requirements and tenant safety.

2.5. The Penalty Charge shall be set at £1000 for the first offence but this will be reduced to £750 only if paid within a 14 day period.

2.6. Should the landlord not comply with future Remedial Notices, served on the same or other properties, then the fine shall be set according to the table below:

<table>
<thead>
<tr>
<th>Offence</th>
<th>Standard Penalty Charge</th>
<th>Prompt payment of reduced fine</th>
</tr>
</thead>
<tbody>
<tr>
<td>First</td>
<td>£1,000</td>
<td>£750</td>
</tr>
<tr>
<td>Second</td>
<td>£2,000</td>
<td>N/A</td>
</tr>
<tr>
<td>Third and all subsequent</td>
<td>£5,000</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Note: Discount will only be given for prompt payment for the first offence, not any subsequent offences

3. Appeals in relation to a Penalty Charge Notice

3.1. The landlord can request in writing, in a period that must not be less than 28 days beginning with the day on which the penalty notice was served, that the Council review the penalty charge notice.

3.2. The Council will consider any representation and decide whether to confirm, vary or withdraw the penalty charge notice.

3.3. A landlord who is served with a notice confirming or varying a penalty charge notice may appeal to the First-tier Tribunal against the Council’s decision.

4. Arrangements for Remedial Works being Undertaken

4.1. Where the Council is satisfied that a landlord is in breach for failing to comply with a Remedial Action Notice, they must, if the necessary consent of the occupier is given, arrange for an ‘authorised person’ to undertake the remedial action specified in the notice within 28 days of being satisfied of the landlord being in breach of the notice.

4.2. The Council will give at least 48 hours’ notice of the action to the occupier of the premises concerned. The costs of fitting alarms will be included within the Council’s penalty charges specified above.
Financial Penalty Policy

Introduction

1. The Housing and Planning Act 2016 allows local housing authorities to impose financial penalties of up to £30,000 as an alternative to prosecution for a range of offences contained within the Housing Act 2004:

   1.1. Failure to comply with an improvement notice
   1.2. Offences relating to the licensing of houses
   1.3. Failure to comply with an overcrowding notice
   1.4. Failure to comply with management regulations in respect of HMOs

2. The council will use these new powers in accordance with the following principles:

   2.1. The failure to comply with the requirements listed above are criminal offences and, as such, a financial penalty will be considered in every case where an offence has been identified

   2.2. A prosecution may be an appropriate option where an offence is particularly serious or where the offender has committed similar offences in the past

   2.3. A financial penalty will only be imposed where the council is satisfied beyond reasonable doubt that an offence has been committed

   2.4. In addition, the council will consider whether the imposition of a financial penalty is in the public interest

   2.5. The amount of the financial penalty will reflect the seriousness of the offence and will be determined in a consistent and transparent way

3. Regulations made under the Housing and Planning Act 2016 and the Housing Act 2004 enable the council to use any financial penalty recovered to meet the costs and expenses incurred in, or associated with, carrying out any of its enforcement functions in relation to the private rented sector.

4. Schedule 13A to the Housing Act 2004 deals with the procedure for imposing financial penalties, appeals and enforcement.

Determining the Penalty

5. Statutory guidance states that the following factors should be considered when determining the appropriate level of penalty:

   5.1. Severity of the offence
   5.2. Culpability and track record of the offender
   5.3. Harm caused to the tenant
   5.4. Punishment of the offender
   5.5. Deterring the offender from repeating the offence
   5.6. Deterring others from committing similar offences
   5.7. Removing any financial benefit the offender may have obtained as a result of committing the offence
6. The council will use a consistent approach based on the Magistrates’ Court Sentencing Guidelines issued by the Sentencing Council. The factors taken into account are shown in more detail in Appendix 7.

7. A penalty band will be indicated based on a judgement of culpability and harm as shown in the following matrix:

<table>
<thead>
<tr>
<th>Harm</th>
<th>Culpability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Very high</td>
</tr>
<tr>
<td>High</td>
<td>Band 6</td>
</tr>
<tr>
<td>Medium</td>
<td>Band 5</td>
</tr>
<tr>
<td>Low</td>
<td>Band 2</td>
</tr>
</tbody>
</table>

8. With the exception of Band 1, each band has an assumed starting point which indicates the penalty before any possible adjustments have been considered.

<table>
<thead>
<tr>
<th>Band</th>
<th>Financial penalty range/£</th>
<th>Assumed starting point/£</th>
<th>Adjustment increment/£</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>100</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>1b</td>
<td>150</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>1c</td>
<td>200</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>2</td>
<td>200-800</td>
<td>400</td>
<td>200</td>
</tr>
<tr>
<td>3</td>
<td>1,000-4,000</td>
<td>2,000</td>
<td>1,000</td>
</tr>
<tr>
<td>4</td>
<td>6,000 – 12,000</td>
<td>8,000</td>
<td>2,000</td>
</tr>
<tr>
<td>5</td>
<td>14,000 – 20,000</td>
<td>16,000</td>
<td>2,000</td>
</tr>
<tr>
<td>6</td>
<td>22,500 – 30,000</td>
<td>25,000</td>
<td>2,500</td>
</tr>
</tbody>
</table>

9. The Penalty Bands are weighted as follows:

9.1. Band 1 relates to offences where there is a low risk of harm. Financial penalties at this level are designed to encourage compliance with lower level requirements for example failing to maintain yards and gardens or failure to display an information notice in a house in multiple occupation. They will also act as an initial deterrent where management standards are beginning to slip to prevent more significant contraventions.

9.2. Bands 2 and 3 relate to more serious, but still relatively minor offences. This is reflected in lower indicative penalties. Penalties at this level will be considered as a deterrent to prevent more serious offending.

9.3. Band 4 and 5 fines relate to the type of offences that are normally dealt with by the council where there is a higher risk of harm and greater culpability. These offences carry significantly higher financial penalties.

9.4. Band 6 is reserved for cases where the contravention exposed people to a high risk of harm due to an intentional breach or flagrant disregard of the law.

10. In each band, the penalty may be adjusted by the incremental value to reflect the level of co-operation experienced following identification of the offence:
Housing Support and Regulation Strategy

<table>
<thead>
<tr>
<th>Full co-operation following identification of offence</th>
<th>Reduce from starting point by one increment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimal further input required by the council to achieve compliance</td>
<td>No adjustment</td>
</tr>
<tr>
<td>Significant involvement by the council required to achieve compliance</td>
<td>Plus one increment</td>
</tr>
<tr>
<td>A significant lack of co-operation and/or obstruction leading to significant further enforcement activity (e.g. works in default)</td>
<td>Plus two increments</td>
</tr>
</tbody>
</table>

11. Finally, the council will apply the “Totality Principle” in cases where more than one penalty has been imposed, with a view to ensuring that the total penalty or penalties properly reflect all of the offending behaviour and are just and proportionate in all the circumstances.

**Ability to Pay**

12. Statutory guidance states that local housing authorities should use their existing powers to, as far as reasonably possible, make an assessment of a landlord’s assets and any income (not just rental income) they receive when determining an appropriate financial penalty.

13. The existing powers available to the council include:
   - Section 235 Housing Act 2004 (power to require documents to be produced)
   - Housing Benefit and Council Tax information (permitted by Section 237 of the Housing Act 2004)
   - Service of a requisition for information under section 16 of the Local Government (miscellaneous provisions) Act 1976 (power to obtain particulars of persons interested in land)

14. When a person receives a notice of intent to impose a financial penalty they have the right to make written representations about the proposal. The council will specifically ask for those representations to include any evidence of the person’s ability to pay the proposed penalty.

15. If no representations are received then the presumption will be that the person is able to pay the full amount of the proposed penalty. This presumption will be tested against information held by the council, or publicly available information such as company records or land registry entries.

16. Evidence put forward in representations will be assessed for accuracy against council-held and public information.

17. Where appropriate, further information may be required through service of notices using the powers listed above.

18. Any evidence about ability to pay will be considered before a final decision is made about the level of the penalty.

**Representations and Appeals**

171019
19. A person who is given a notice of the council’s intention to impose a financial penalty may make written representations to the council within 28 days beginning with the day after that on which the notice was given. These should be addressed to the Housing Standards Team at the council or emailed to hstandards@s-norfolk.gov.uk.

20. Written representations will be considered by the Director of Communities and Well-Being.

21. A person who is given a final notice requiring a penalty to be paid may appeal to the First-tier Tribunal against

21.1. The decision to impose the penalty, or
21.2. The amount of the penalty

22. Details about how to make an appeal will be included with any final notice.

Recovery

23. A penalty must be paid within 28 days beginning with the day after that on which the notice was given

24. In the absence of an appeal and where a penalty is not paid within 28 days, the council will seek to recover it through a county court order.
## Determination of Culpability and Harm

### CULPABILITY

<table>
<thead>
<tr>
<th>Band</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
</table>
| Very high | The offender has intentionally breached or flagrantly disregarded the law | The offender has a track record of failure to comply  
There is evidence that the offender has deliberately delayed compliance for example to prevent a complainant from benefitting from improvements  
An opportunity to comply was deliberately avoided, for example, by moving a new tenant in to the property before a known hazard or breach has been remedied  
Deliberate avoidance of significant cost through non-compliance |
| High      | Actual foresight of, or wilful blindness to, risk of offending but risk nevertheless taken | The offender had knowledge of the breach, for example through a complaint, but has not responded  
A clear requirement by the council has been ignored. This would include an improvement notice that has not been complied with, or the failure to respond to a letter requesting action to address a management failure  
The offender is a member of a professional body which makes clear requirements that have not been followed, leading to the breach  
Offender had not started the works by the notice expiry date and had not made a reasonable case for an extension of time |
| Medium    | Offence committed through act or omission which a person exercising reasonable care would not commit | A failure to carry out regular inspections, for example, of the common parts of a house in multiple occupation  
Failure to have adequate systems in place to avoid the offence, for example, an emergency contact or regular maintenance contract for gas appliances or fire alarm systems |
The offender did not provide sufficient contact information to the tenant to enable the problem to be addressed

Offender has failed to comply with notice start by date but, nevertheless, completed the works satisfactorily within time

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>Offence committed with little fault, for example because: Significant efforts were made to address the risk although they were inadequate on this occasion There was no warning/circumstance indicating a breach Failings were minor and occurred as an isolated incident</td>
<td>Failure to comply with licence conditions aimed at lessening the impact of the use of the property on the amenity of the local area (e.g. keeping yards and gardens in reasonable condition) where there is no ongoing history of similar breaches Failure to display an information notice where required to do so</td>
</tr>
</tbody>
</table>

### HARM

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td>Serious adverse effect(s) on individual(s) and/or having a widespread impact High risk of an adverse effect on individual(s)</td>
<td>Failure to comply with an improvement notice served under section 11 of the Housing Act 2004 (category 1 hazard) Failure to maintain fire precautions</td>
</tr>
<tr>
<td>Medium</td>
<td>Adverse effect on individuals(s) Medium risk of an adverse effect on individual(s) or low risk of serious adverse effect Legitimate industry substantially undermined by offender’s activities</td>
<td>Failure to comply with an improvement notice served under section 12 of the Housing Act 2004 (category 2 hazard) Failure to maintain facilities or to clean common parts in houses in multiple occupation Unfair competition with landlords who do not commit offences e.g. by overcrowding</td>
</tr>
<tr>
<td>Low</td>
<td>Low risk of an adverse effect on individual(s)</td>
<td>Failure to display an information notice in a house in multiple occupation where the tenants possess that information through other means Minor inconvenience either to tenants or local residents through a failure to comply with licence conditions</td>
</tr>
</tbody>
</table>
Car Parking Proposals

Report of the Senior Economic Growth Coordinator
Cabinet Member: Cllr. Lee Hornby, Regulation and Public Safety

CONTACT
David Disney 01508-533731
ddisney@s-norfolk.gov.uk
1.0 Introduction

1.1 This report follows on from a full review of car parking provision in South Norfolk, which assessed the service against the key principles established in 2008, and recommended a series of proposals to Cabinet on 24 October 2016 which were agreed. This review confirmed that the principles remain relevant today, but took into consideration the special arrangements already in place in Harleston. Cabinet agreed an extension to the current lease be made to allow for negotiations to take place with the Town Council on the future of the two Car Parks in Harleston. This follow up report, outlines the result of those negotiations.

2.0 Background

2.1 South Norfolk Council agreed a number of principles in relation to the provision of car parking across the whole district in 2008, which were updated and re-affirmed at the Cabinet meeting on 24 October 2016. These principles can be summarised as:

a) The public should expect to receive an improved standard of service in terms of maintenance, security etc.

b) The approach to the question of charging for car parks should be on a consistent basis across the district, recognising the need to encourage the use of our market towns.

c) Charges and free parking periods should be set to encourage short stay use in the town centres, and separate long stay use in other areas.

d) As a general rule the cost of maintaining car parks should fall on the beneficiaries rather than the general council tax payer.

e) Any surplus generated should be retained in a car park reserve and used to increase maintenance or decrease costs for following years.

f) The charging regime should not be inconsistent with the Council’s overriding principles.
3.0 Harleston arrangements

3.1 Car parking in Harleston is currently available at no cost to the end user as a result of a special arrangement between South Norfolk Council and Redenhall with Harleston Town Council which began in 2008 with a lease agreement which was revised and renewed in 2012. The current lease arrangement was a mutually agreed lease at a combined rental of £17,156.00 and was due to expire on September 2016. However the lease payment does not cover the full cost of running the two car parks in Harleston, leaving a significant amount to be covered by the general taxpayer. In addition surveys showed that the car parks are not experiencing sufficient “churn” during the day, resulting in a lack of availability of spaces. Increasing the “churn” should lead to increased footfall in the town centre. National statistics bear out this theory and South Norfolk Council’s own studies and surveys have proven that its car parks are almost always full, and the corresponding high streets are almost always empty. Introducing a charging regime would encourage “churn” to take place.

Due to the limited time before the agreed 2016 proposals, set out in the October 2016 cabinet report, were introduced and the desire to incorporate wider opportunities for the town, it was felt prudent to agree a 12-month extension whilst these other opportunities were explored and progressed. Following discussions with the Town Council a further additional one month extension to the lease was agreed and therefore the current arrangement expires on 31 October 2017.

3.2 A range of options has been proposed to Redenhall with Harleston Town Council to ensure that the key principles are maintained and a proper balanced provision is provided for the town. These options initially included an arrangement involving several Town and District Councils assets, which would have been put in place to mitigate any additional costs to the Town Council. In relation specifically to the two Car Parks, the proposal was that all car parks are treated the same across the district, so car park charging would be introduced in Harleston but would retain the first hour free. As an alternative however, South Norfolk Council offered the Town Council the opportunity to increase the one free parking hour for town centre visitors to two free hours by making an annual payment.

3.3 South Norfolk Council accordingly offered to work with, and provide information to, the Town Council’s own steering group, set up in order to reach a mutually acceptable resolution. Redenhall with Harleston Town Council rejected the proposal of a package across the range of assets, preferring to concentrate on the car parks negotiation in isolation.
3.4 During the period of negotiations South Norfolk Council was approached by Redenhall with Harleston Town Council with a proposal for a new lease at a peppercorn value to continue completely free parking. Although not its preferred option as it would not address the issue of lack of “churn” in the car parks, South Norfolk Council was willing to consider a new lease but only on the basis that the lease payment was increased to defray the irreducible costs of operating the two car parks.

The cost of running all of South Norfolk Council’s car parks across the district is in the region of £400,000 and, of this, the irreducible overheads are spread across all of our car parks in proportion to the number of spaces which total 987. In Harleston there are 196 spaces, therefore Harleston car parks share approximately a fifth of the costs. Were the irreducible costs not spread evenly then the other car parks in the district would have to pick up a greater share which would not be fair and equitable to those other places.

3.5 The cost of the new proposed lease offered by South Norfolk Council for both car parks is £50,000 per annum (with periodic escalation) which would be inclusive of an annual sum of £13,000 towards the resurfacing of the car parks to obviate the need for the Town Council to account for its own maintenance sinking fund. The £13,000 would be placed in a special reserve for that purpose. South Norfolk Council’s best estimate is that resurfacing and other refurbishment costs approximate to £260,000 every twenty years or so. The remaining £37,000 represents the proportion of the irreducible overhead costs attributable to the number of car park spaces in Harleston. The proposal is caveated on the basis that no additional or supplementary car park charges are raised from any users of the car parks during the period of the lease. As a concession, South Norfolk Council will not request Redenhall with Harleston Town Council make good any dilapidations which it is obliged to remedy under the current leasing arrangements at the end of the existing term. This would in effect be a saving to the Town Council at the end of the current lease.

3.6 Further briefings have taken place during the period between the two parties to establish the irreducible costs and the terms of any future arrangement. In addition a number of public meetings have been held by the Town Council at which South Norfolk Council Members and Officers have been present. At the Redenhall and Harleston Town Council meeting on 16 August 2017 it was agreed to hold an independently conducted Town Poll on 7 September 2017 to obtain the view of residents on the three options available for the two car parks.

3.7 The Town poll questions and number of votes cast with a 15% turnout are provided below:
### Table

<table>
<thead>
<tr>
<th>Option</th>
<th>Question</th>
<th>Answer</th>
<th>Number of votes cast</th>
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<tbody>
<tr>
<td>1</td>
<td>Would you like 1 hour free parking?</td>
<td>Y/N</td>
<td>134</td>
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<tr>
<td>2</td>
<td>Would you like 2 hours free parking?</td>
<td>Y/N</td>
<td>141</td>
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<tr>
<td>3</td>
<td>Would you like the Council to take out a new long term lease?</td>
<td>Y/N</td>
<td>345</td>
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### 3.8

At a meeting of Redenhall with Harleston Town Council on 18 October 2017 it was resolved that the Council would ask South Norfolk Council to grant a new ten-year lease on the following terms:

A combined Index linked annual rental for car parks at Broad Street and Bullock Fair Close of £37,000.00

- Rates liability for both sites to be assumed by the Town Council
- Maintenance of the sites to be carried out by the Town Council
- The Town Council will establish a reserve account in their financial accounts to provide a sinking fund for repairs into which they will make an annual contribution of £13,000.
- The Town Council will, with the agreement of South Norfolk Council, defray some of the cost of the annual rental by entering into an arrangement with the East of England Co-Op for a £30,000 annual payment to the Town Council.

### 4.0 Proposals

4.1 It is therefore proposed that South Norfolk Council draw up heads of terms to enable a new ten-year lease to be granted on the terms outlined in 3.8 above on the basis that the proposals provide South Norfolk Council with the income to cover the irreducible costs of operating parking services in Harleston. As the proposed lease attracts a rental of less than £50,000 pa and is for a duration of less than 20 years, this could be approved by the Strategic Leadership team in accordance with the Rules of Financial Governance. However, in the spirit of openness and transparency, and given the duration of the negotiations, it has been brought to Cabinet for their approval.
5.0 Risks and implications arising

5.1 There is a risk that the new lease arrangements will not solve the space blocking issue which could lead to reduced footfall in the town centre. However, the Town Council and Business Forum are happy to accept this situation.

5.2 The proposal for a new lease arrangement will not present any increase in risk to the environment or an increase in crime and disorder.

6.0 Other options

6.1 The Town Council did offer a peppercorn rental, to be payable in exchange for a long-term lease on the car parks, but South Norfolk Council rejected this proposal as it did not cover the irreducible costs of operating car parking services for the two car parks in the town, which would have left the other car parks in the district having to cover these additional costs.

6.2 South Norfolk Council did offer a package deal to the Town Council, which would have involved collaboration across a number of town assets and had a positive financial outcome for the Town Council, but this was rejected by the Town Council who wished to treat the other assets separately.

6.3 South Norfolk Council's preferred option to encourage churn in the car parks was to introduce pay and display machines, with the first hour free of charge, in line with the rest of the district and the parking principles re-affirmed by Cabinet on 24 October 2016.

6.4 South Norfolk Council offered a similar arrangement to 6.3 above but with two free hours parking, enabling the Town Council or a local business sponsor to subsidise the cost of the second free hour.

6.5 South Norfolk Council also offered to renew the lease at a cost of £50,000 per annum in rental, plus rates; this sum to include a sink fund of £13,000 pa, ring fenced to accrue for re-surfacing and major repairs and maintenance.

7.0 Recommendation

7.1 It is therefore recommended that Cabinet agree to the granting of a new lease to Redenhall with Harleston Town Council on the terms set out in paragraph 3.8 in this report.
## CABINET CORE AGENDA 2017/18

<table>
<thead>
<tr>
<th>Date</th>
<th>Decisions: Key, Policy, Operational</th>
<th>Key Decision/Item</th>
<th>Lead Officer</th>
<th>Cabinet Member</th>
<th>Exempt Y/N</th>
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<tr>
<td>30 Oct</td>
<td>O</td>
<td>Performance Risks and Finance Budget Position Q2</td>
<td>E Goddard, A Mewes, M Fernandez – Graham</td>
<td>B Stone</td>
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<td>P</td>
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<td>O</td>
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<td>O</td>
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<td>O</td>
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<td></td>
<td>O</td>
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<td>M Fernandez-Graham</td>
<td>B Stone</td>
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<td>4 Dec</td>
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<td>K Mason Billig</td>
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<td>O</td>
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**Council 19 February 2018**

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Key decisions are those which result in income, expenditure or savings with a gross full year effect of £100,000 or 10% of the Council's net portfolio budget whichever is the greater which has not been included in the relevant portfolio budget, or are significant (e.g. in environmental, physical, social or economic) in terms of its effect on the communities living or working in an area comprising two or more electoral divisions in the area of the local authority.