



Cabinet

A meeting of the Cabinet will be held at the Council Chamber, The Forum, Moat Lane, Towcester, NN12 6AD on Tuesday 11 July 2023 at 6.00 pm

Agenda

Public Session	
1.	Apologies for Absence and Notification of Substitute Members
2.	Declarations of Interest Members are asked to declare any interest and the nature of that interest which they may have in any of the items under consideration at this meeting.
3.	Minutes (Pages 5 - 12) To confirm the minutes of the meeting of Cabinet held on 13 June 2023.
4.	Chair's Announcements To receive communications from the Chair.
5.	Urgent Business The Chairman to advise whether they have agreed to any items of urgent business being admitted to the agenda.
6.	Reports from Overview and Scrutiny Committees (Pages 13 - 50) Item 06a: Corporate Overview and Scrutiny Committee – Modernising Systems Item 06b: West Northamptonshire Housing Allocation Scheme – recommendations by the Children, Education and Housing Overview and Scrutiny Committee

7.	Provisional Outturn Report - Revenue (Pages 51 - 88)
8.	Provisional Outturn Report - Capital (Pages 89 - 116)
9.	SEND Strategy 2023-26 (Pages 117 - 144)
10.	Towns Fund Leisure Project Business Case (Pages 145 - 252)
11.	Procurement of a new Strategic Transport Model (Pages 253 - 260)
12.	Home to School Transport Policy (Pages 261 - 328)
13.	To agree the additional budget for the purchase of machinery to increase highways maintenance productivity (Pages 329 - 334)
14.	Library Service Strategy 2023-27 (Pages 335 - 354)
15.	West Northants Housing Allocations Policy (Pages 355 - 456)
16.	Anti-Poverty Strategy (Pages 457 - 528)
17.	Energy Procurement Risk Management Strategy 2024-28 (Pages 529 - 538)
18.	Housing Acquisitions Programmes (Pages 539 - 546) Please note the General Exception Rule has been applied.
19.	HMO Working Group Report (Pages 547 - 558)
20.	Disposal of Areas of WNC Land by Leasehold (Pages 559 - 578)

Exclusion of the Press and Public

21.	Exclusion of the Press and Public In respect of the following items the Chairman may move the resolution set out below, on the grounds that if the public were present it would be likely that exempt
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information (information regarded as private for the purposes of the Local Government Act 1972) would be disclosed to them: The Committee is requested to resolve: "That under Section 100A of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that if the public were present it would be likely that exempt information under Part 1 of Schedule 12A to the Act of the descriptions against each item would be disclosed to them"

Private Session

Catherine Whitehead
Proper Officer
3 July 2023

Cabinet Members:

Councillor Jonathan Nunn (Chair)

Councillor Adam Brown (Vice-Chair)

Councillor Fiona Baker

Councillor Rebecca Breese

Councillor Matt Golby

Councillor Mike Hallam

Councillor Phil Larratt

Councillor Daniel Lister

Councillor Malcolm Longley

Councillor David Smith

Information about this Agenda

Apologies for Absence

Apologies for absence and the appointment of substitute Members should be notified to democraticservices@westnorthants.gov.uk prior to the start of the meeting.

Declarations of Interest

Members are asked to declare interests at item 2 on the agenda or if arriving after the start of the meeting, at the start of the relevant agenda item

Local Government and Finance Act 1992 – Budget Setting, Contracts & Supplementary Estimates

Members are reminded that any member who is two months in arrears with Council Tax must declare that fact and may speak but not vote on any decision which involves budget setting, extending or agreeing contracts or incurring expenditure not provided for in the agreed budget for a given year and could affect calculations on the level of Council Tax.

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Or by writing to:

West Northamptonshire Council
One Angel Square
Angel Street
Northampton
NN1 1ED



Cabinet

Minutes of a meeting of the Cabinet held at Council Chamber, The Forum, Moat Lane, Towcester, NN12 6AD on Tuesday 13 June 2023 at 6.00 pm.

Present:

Councillor Jonathan Nunn (Chair)
Councillor Adam Brown (Vice-Chair)
Councillor Fiona Baker
Councillor Rebecca Breese
Councillor Matt Golby
Councillor Mike Hallam
Councillor Phil Larratt
Councillor Daniel Lister
Councillor Malcolm Longley
Councillor David Smith

Also Present:

Councillor Sally Beardsworth
Councillor Keith Holland-Delamere
Councillor Rosie Humphreys
Councillor Bob Purser
Councillor Wendy Randall

Officers:

Anna Earnshaw, Chief Executive
Rebecca Peck, Assistant Chief Executive
Martin Henry, Executive Director - Finance (Section 151 Officer)
Catherine Whitehead, Director of Legal and Democratic (Monitoring Officer)
Stuart Lackenby, Executive Director - People Services & Deputy Chief Executive
Sarah Reed, Executive Director - Corporate Services
Stuart Timmiss, Executive Director - Place, Economy and Environment
Paul Hanson, Head of Democratic and Elections
Kathryn Holton, Committee Officer

1. **Declarations of Interest**

There were none.

2. **Minutes**

The minutes of Cabinet on Tuesday 11 April 2023 were agreed as an accurate record.

3. **Chair's Announcements**

There were none.

4. **Report from Overview and Scrutiny Committee (if any)**

There were no reports from Overview and Scrutiny Committees.

5. **Corporate Plan - Quarterly Performance Report**

The Chair presented the report and summarised the salient points. The end of year provided an opportunity for a refresh, so some new indicators would be added and others, such as Covid related indicators, removed.

Cabinet members made the following comments:

Councillor Longley advised that there had been a £302k overspend. Despite pressures, the budget had effectively been balanced.

Councillor Brown noted that visitors to leisure centres exceeded targets. Library visits were well above target and museums exceeded targets by 1%. Housing delivery was below target, although this was being addressed by the new Chief Executive at NPH. Affordable homes continued to exceed the target.

Councillor Larratt reported that the Queen's Green Canopy had delivered a good result. Trees planted on WNC land were up 277 in Q4 and there were 150 more trees planted than lost over the whole year.

Councillor Baker highlighted that the figures for the Children's Trust were for the whole county, not just West Northants. Work was ongoing to provide figures for West Northants, which would be expected by Ofsted.

Councillor Golby advised that the CQC inspection format would commence in August and KPIs might change to align with that in future.

Councillor Breese reported that success rates against national targets in planning for both major and household applications would be reported. There was still some backlog but the picture was improving.

Councillors made the following comments:

- The report on museums was welcomed as museums were important in the cultural life of the community. What had happened to the leather collection?
- The number of houses needed to be increased and attempts by developers to argue down affordable housing numbers resisted. More houses were needed, not just flats.
- Secondary school absence rates and exclusions would be helpful. This needed to be monitored.
- Concern was expressed about the number of vacant posts in Cllr Larratt's area.

- Home to school transport was only free for those who qualified up to age 16 whereas education/training was compulsory to age 18. The cost of bus passes was much greater in rural areas.
- Referrals actioned within 2 working days was underperforming – were there enough staff to improve this?
- Children subject to a Child Protection Plan for the second time had not gone down.
- Concern was expressed at the high level of those not in education or training (NEET).
- A highways plan would be useful to enable members to respond to queries from residents.

The Executive Director Place stated that concern regarding vacant posts was accepted. A project management approach was being followed to identify issues in recruitment which would be followed through.

Councillor Brown made the following comments:

- The need to continue to deliver a housing mix was recognised – a third of those on the list were waiting for 1-bed accommodation and flats were an effective way of delivering that. The officers' briefing on planning/housing had been positive.
- The leather collection was due to be transferred later in the year and would have a specialist part-time curator.

The Executive Director People made the following comments:

- A task force of head teachers, police and community representatives led by the Assistant Director Education was addressing the issue of increased exclusions and suspensions.
- The 2 working days indicator for referrals was a priority. All red-rated referrals were seen within 1 day.
- The target for NEET was 5.5%, so the current rate of 2% was well below this.

Councillor Larratt advised that the recent home to school transport consultation was only up to age 16. WNC had a statutory responsibility to pay for those who qualified for free transport.

RESOLVED: that Cabinet noted the content of the appendix covering the final quarter of 2022-23.

6. **Household Support Fund 4**

At the Chair's invitation Councillor Golby presented the report and summarised the salient points. The public health team were thanked for a detailed and thorough report. £5.199m was to be distributed between April 2023 and March 2024. This would be targeted towards children in poverty, vulnerable households and voluntary sector grants.

Councillors made the following comments:

- What would happen when the funding came to an end? There needed to be alignment with the Anti-Poverty Strategy.
- Housing support was welcomed, but this was not a long-term solution.
- What about hungry children over the summer holidays – particularly those who did not receive benefits?
- It was tragic that foodbanks were normalised. Additional funding was needed.
- Thanks were expressed to the voluntary sector and staff that delivered services.

Councillor Golby recognised the challenges and the need to make services more sustainable when funding came to an end. Government was being lobbied. Communities needed to be supported in partnership with voluntary organisations. There had been 52,000 visits to warm spaces between January and March 2023, including a high number with mental health issues.

Councillor Brown noted that communication between local and national government was improving. The government had listened to feedback and funding was now in place until March 2024.

RESOLVED: that Cabinet:

- a) Approved the recommended plan for distribution of the allocated £5,199,257 HSF4, as set out in section 6 of the report.
- b) Agreed that any under-spend and/or unclaimed support vouchers in a particular category of spend may be re-allocated to other categories based on need and demand as agreed by the Director of Public Health and Cabinet Member.
- c) Noted the proposed consultation period and pilot to explore use of support vouchers to access Food Clubs/Larders.

7. **Proposal to extend the age-range at Croughton All Saints CE Primary School**

At the Chair's invitation Councillor Baker presented the report and summarised the salient points. The opportunity for funded 3 year olds to join the school would help to sustain its future. Any school wanting to lower its age range would be supported and it was good to preserve village schools.

RESOLVED: that Cabinet approved the proposal to lower the admissions age range at Croughton All Saints CE Primary School, from 4 years to 3 years, to enable the school to offer FEEE to three-years-olds from September 2023.

8. **Decision taken by the Leader of the Council under urgency: LAHF programme**

At the Chair's invitation Councillor Brown presented the report and summarised the salient points. It had not been possible to bring this report to the April meeting of Cabinet. The LAHF funding could have been passed to NPH to refurbish homes but this would have put undue pressure on the HRA and on NPH. WNC had asked the government if a hybrid approach could be taken with RP partners funding as many properties as possible with NPH and the HRA as a fall-back position. The

government funding would act as a subsidy going forward because the council would retain rights to the house after the first tenant moved out. This would help the council meet the wider need in the long term.

Councillors made the following comments:

- The report was welcomed to assist those in need – although it would not be enough.
- Did Futures and Grand Union have the capacity to deliver and an understanding of the communities in order to be able to deal with them sensitively?
- What would the criteria be for allocation? Many Afghan refugees had been in hotels for 2 years.
- Why were new houses on Welford Road not being brought into use?

Councillor Smith advised that there had been 380 Afghan refugees in hotels who were moving on to other areas.

Councillor Brown made the following comments:

- Grand Union had previously dealt with Syrian refugees.
- The Futures housing project on Welford Road had had issues with a sub-contractor. Until the Section 278 Agreement had been fulfilled the project could not be delivered. It was right to hold developers to account.

RESOLVED: that Cabinet noted the decisions taken by the Leader of the Council set out in the Appendix.

9. **Procurement and implementation of Adult Social Care Case Management System**

At the Chair's invitation Councillor Golby thanked the Assistant Director of Discharge to Assess Services, presented the report and summarised the salient points. The current system was due to end in March 2025 and a new system needed to be implemented. This would give the opportunity to access social care records electronically.

Councillors welcomed the report and asked whether the new system would be ready to go with teething problems sorted before the deadline.

The Executive Director People advised that the system would be up and running by January 2024 when data transfer would begin. Phase 2 would be implemented in September 2024.

RESOLVED: that Cabinet:

- a) Agreed to proceed with the replacement of the Adult Social Case Management, at an estimated contract cost, including supplier implementation (£300,000), hosting, and annual fee costs, of up to £2,500,000 as outlined in section 7.
- b) Noted that in addition to the above costs a further £1.018m of costs would be incurred to implement the new system.

- c) Subject to consideration at the transformation board, supported the use of Transformation Funds, at an estimated cost of £1,318,000 to fund the total implementation costs.
- d) Noted that the ongoing costs of £367,000 per year were anticipated to be met from existing budgets and savings associated with the new system but if, following procurement, there was a shortfall the difference would be built into the 2025-26 budget.
- e) Approved the use of the Crown Commercial Services RM (6259) Vertical Application Solutions (VAS) Framework Lot 2c to purchase the system to ensure compliance with the relevant procurement requirements.
- f) Delegated authority to the Executive Director of People Services in liaison with the Lead Cabinet Member for Adult Social Care and Public Health, to take any further decisions and actions required to award the contract and implement the Case Management System.

10. **Reablement Commissioning Intentions**

At the Chair's invitation Councillor Golby presented the report and summarised the salient points.

A Councillor welcomed the plan to support people for longer in their own homes.

RESOLVED: that Cabinet

- a) Approved the procurement and implementation of a framework for the purchasing of additional capacity of reablement home care services, to be introduced from 18 October 2023.
- b) Approved the duration of the framework to be 2 years with an optional break at the end of year 1 and an inclusive option to extend for a further period of up to 12 months; resulting in a framework for a maximum duration of 3 years.
- c) Approved the commencement of a competitive procurement process.
- d) Approved the delegation of authority to the Executive Director for People Services in consultation with the Cabinet Member for Adult Social Care and Public Health to take all operational decisions necessary to implement the above resolutions.

11. **Disposal of London Road, Daventry**

At the Chair's invitation Councillor Longley presented the report and summarised the salient points. This would enable the council to co-operate with other land owners to dispose of a small area of low-grade agricultural land.

A Councillor noted that the London Road approach to Daventry currently had a scrapyards and a disused hotel. Would warehouses be added to this area? Concern was expressed about the climate impact and the number of warehouses.

The Executive Director Place advised that at this stage the land was simply being packaged for sale and promotion. It would be subject to future planning applications and due process.

RESOLVED: that Cabinet authorised the Assistant Director Assets & Environment in consultation with the Finance Portfolio Holder to agree terms for the disposal of land off the A45 London Road, Daventry and complete any documentation required to implement this, in accordance with the constitution and the following:

- a) A hybrid promotion agreement with GC No. 19 Limited or another company associated with Godwin Developments should be entered into to promote and facilitate the disposal of the Site via the open market.
- b) Should the agreement not be achieved for any reason or elapse, disposal would be directly via the open market.
- c) The consideration should not be less than the pro-rata minimum purchase price or such a figure that reasonably represents market value.

12. **Exclusion of the Press and Public**

In respect of the following item the Chairman moved the resolution set out below, on the grounds that if the public were present it would be likely that exempt information (information regarded as private for the purposes of the Local Government Act 1972) would be disclosed to them: The Committee is requested to resolve: "That under Section 100A of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that if the public were present it would be likely that exempt information under Part 1 of Schedule 12A to the Act of the descriptions against each item would be disclosed to them"

13. **Update to the Northampton Railway Station Multi Story Car Park Proposal**

This item was discussed in private.

DECISION TAKEN

That Cabinet:

- a) Noted the work undertaken since the cabinet report of December 2021.
- b) Approved the terms as set out in the private Appendix A for entering into an Agreement for Headlease and subsequent Headlease, Agreement for Underlease and subsequent Underlease and an Agreement for Sub-Underlease and subsequent Sub-underlease of the new MSCP at Northampton Railway Station.
- c) Delegated authority to the Director of Communities and Opportunities in consultation with Chief Finance Officer, the Monitoring Officer and the Cabinet Member for Economic Development, Town Centre Regeneration and Growth and Economy to take the final decision, take all necessary steps and complete the necessary documentation related to the new MSCP at Northampton Railway Station subject to (d) below
- d) Agreed that the Council should only proceed with the proposed lease arrangements subject to the overall business case continuing to show a profit for the Council. This will be assessed prior to entering into the agreements by the Head of Major Project and Regeneration.

The meeting closed at 7.40 pm

Chair: _____

Date: _____



WEST NORTHAMPTONSHIRE COUNCIL CABINET

11th July 2023

**Cabinet Member For Corporate Services and HR:
Councillor Mike Hallam**

Report Title	Corporate Overview and Scrutiny Committee – Modernising Systems
Report Author	Tracy Tiff, Deputy Democratic Services Manager, tracy.tiff@westnorthants.gov.uk 01604 837408

Contributors/Checkers/Approvers		
Monitoring Officer	Catherine Whitehead	14/06/2023
Chief Finance Officer	Martin Henry	14/06/2023
Other Director/SME	Sarah Reed	13/06/2023 Updated 27th June
Communications Lead/Head of Communications	Becky Hutson	28/06/2023

List of Appendices

Appendix A - Report of the Modernising Systems Task and Finish Group

Appendix B – Review of Recommendations by Chief Executive and Executive Leadership Team

1. Purpose of Report

- 1.1 To present to Cabinet for consideration, the findings and recommendations of Corporate Overview and Scrutiny Committee on the findings of the Scrutiny Spotlight Review – Modernising Systems.

2. Executive Summary

- 2.1 Corporate Overview and Scrutiny Committee established the Modernising Systems Task and Finish Group (the Task and Finish Group) with the purpose of making informed and evidenced based recommendations to Cabinet regarding modernising systems.

2.2 The Task and Finish Group undertook a Spotlight Review and presented its final report to Corporate Overview and Scrutiny Committee, which was approved at its meeting on 15 May 2023.

2.3 The report of the Task and Finish Group is attached at **Appendix A**.

2.4 The report has been reviewed by Executive Leadership Team and their comments are attached at **Appendix B**.

3. Recommendations

3.1 It is recommended to Cabinet that it considers the recommendations of the Modernising Systems Task and Finish Group

3.2 Reason for Recommendations

The recommendation seeks to ensure that Cabinet considers the recommendations coming from the group.

4. Report Background

4.1 The purpose of this Scrutiny review was to provide scrutiny input into modernising systems. The key lines of enquiry were:

- To identify what good systems look like before any potential investments can be made.
- To consider both the capital and revenue expenditure for modernising systems
- To examine how transformation from services is joined up.
- To understand the financial consequence for not modernising systems.
- To recognise the benefits associated with the impact of modernising systems - for example, freeing up staff time and there no longer being the need to chase up data if automated.

4.2 Following approval of its work programme for 2021/2022, Corporate Overview and Scrutiny Committee commissioned the Task and Finish Group comprising all members of the Committee, to undertake a spotlight review – Modernising Systems. It was timely for the review to commence in September 2022.

4.3 This review links to the Council’s corporate priorities, particularly corporate priority - Robust resource management but also it is acknowledged that systems underpin all of the council’s key activities and priorities as an enabling function.

4.4 Following the evidence gathering, the Task and Finish Group established its key findings and conclusions, details of which are contained within Section 4 of its report.

5. Issues and Choices

5.1 Cabinet is asked to consider the recommendation of Corporate Overview and Scrutiny Committee and advise the Committee of its response to the recommendation.

5.2 The options available to Cabinet are to:

a) Respond immediately to the recommendation by either:

- i. Accepting the recommendation from Corporate Overview and Scrutiny Committee.
- ii. Accepting some of the recommendations from Corporate Overview and Scrutiny Committee
- iii. Rejecting the recommendation from Corporate Overview and Scrutiny Committee.

Or:

b) Receive the report of Corporate Overview and Scrutiny Committee and report the response to the recommendation at a future meeting of Cabinet.

6 Implications (including financial implications)

Resources and Financial

6.1 The recommendation of the Committee in relation to the Council increasing its spend on ICT and considering the appropriate percentage to be put into the budget annually; the cost of which would be found from the service areas; would have an impact on budgets; as could the recommendation regarding increasing the pace of transformational change in respect of digital and core systems.

Legal

6.2 Overview and Scrutiny Committees have statutory powers under section 9F of the Local Government Act 2000 which includes to review or scrutinise decisions Cabinet is planning to take, those it plans to implement, and those that have already been taken/implemented.

6.3 The Council's Overview and Scrutiny arrangements are set out in Part 7 of the Council's Constitution.

Risk

6.4 Corporate Overview and Scrutiny Committee had regard to any risks and mitigation factors associated with the recommendation as detailed at paragraph 3 of this report.

Consultation and Communications

6.5 The Cabinet Member for Corporate Services and HR, together with Senior Officers from Corporate Services provided evidence to the Task and Finish Group.

6.6 There is no further requirement for the Committee to consult prior to making recommendations to Cabinet.

Consideration by Overview and Scrutiny

6.7 Corporate Overview and Scrutiny Committee considered and approved the report of the Task and Finish Group at its meeting on 15 May 2023.

Climate Impact

6.8 There are no significant climate impact issues arising from this report.

Community Impact

6.9 There are no significant community impact issues arising from this report.

7 Background Papers

Corporate Overview and Scrutiny Committee - agenda and minutes of the meeting of 15 May 2023

Report of the Modernising Systems Task and Finish Group (May 2023)



**West
Northamptonshire
Council**

West Northamptonshire Council

**Corporate Overview and Scrutiny
Committee**

**Modernising Systems Spotlight
Review**

Index

	Page Nos
Chair's Foreword	3
Executive Summary	5
Final Report including recommendations	10

APPENDICES

Appendix A	Core questions to the Cabinet Member for HR and Corporate Services
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Chair's Foreword

I am delighted to present this report which details the findings, conclusions and recommendations of the Task and Finish Group from its Spotlight Review into Modernising Systems.

The Overview and Scrutiny Task and Finish Group, comprising myself, as Chair of the Task and Finish Group, together with all Councillors of Corporate Overview and Scrutiny Committee was set up.

The purpose of this Scrutiny review was to provide scrutiny input into modernising systems. The key lines of enquiry were:

- To identify what good systems look like before any potential investments can be made.
- To consider both the capital and revenue expenditure for modernising systems
- To examine how transformation from services is joined up.
- To understand how the financial consequence for not modernising systems.
- To recognise the benefits associated with the impact of modernising systems - for example, freeing up staff time and there no longer being the need to chase up data if automated.

The Review was a focussed piece of work that linked to the Council's corporate priorities and examined a range of information over just three meetings. The Review took place between September 2022 and March 2023. It was a very interesting and informative Review; with clear evidence received that led to our conclusions and recommendations.

I thank the Cabinet Member for HR and Corporate Services and Officers for providing information to inform this Review.



Councillor Danielle Stone

Chair, Task and Finish Group – Modernising Systems

Acknowledgements to all those who took part in the Review: -

- Councillors Ian McCord, Andrew Grant, Sally Beardsworth, Paul Clark, Maggie Clubley, Rupert Frost, Keith Holland-Delamere, Mark Hughes, David James, Koullla Jolley, Colin Morgan, Ken Pritchard, Mohammed Aziz Rahman and Richard Solesbury-Timms who sat with me on this Review
- Councillor Mike Hallam, Cabinet Member for HR and Corporate Services, Sarah Reed, Executive Director – Corporate and Chris Wales, Chief Information Officer for providing data and materials to inform this Review

EXECUTIVE SUMMARY

1 Purpose

The purpose of the Spotlight Review was to provide scrutiny input into modernising systems.

The key lines of enquiry were:

- To identify what good systems look like before any potential investments can be made.
- To consider both the capital and revenue expenditure required for modernising systems.
- To examine how transformation from services is joined up.
- To understand the financial consequences of not modernising systems.
- To recognise the benefits realised by modernising systems - for example, freeing up staff time and there no longer being the need to chase up data if automated.

2 Context and Background

2.1 Following approval of its work programme, Corporate Overview and Scrutiny Committee commissioned the Task and Finish Group to undertake a spotlight review – Modernising Systems. A Review commenced in September 2022 and concluded early in March 2023.

2.2 A Task and Finish Group was established comprising the whole Committee with Councillor Stone as the Chair.

Corporate Priorities

2.3 This review links to the Council's corporate priorities, in particular - Robust resource management but also it is acknowledged that systems underpin all of the council's key activities and priorities as an enabling function.

CONCLUSIONS AND KEY FINDINGS

A significant amount of evidence was heard, details of which are contained in the report. After gathering evidence, the Task and Finish Group established that: -

After all of the evidence was collated the following conclusions were drawn:

Transformational Change

4.1 Although good progress has been made to date on bringing together the new Council and stabilising service delivery, the Task and Finish Group now feel that that the pace of transformational change should be augmented from a systems integration perspective. It is essential to review the Councils existing core

processes to maximise the potential of new systems and standardised core processes.

- 4.1 The Task and Finish Group acknowledges that there is a need to know and set out what good looks like before any potential investments can be made, along with the knowledge of what is both capital and revenue expenditure consequences. This includes consideration at a whole council level, taking into account the wider West Northants operating environment (e.g., work with health and the ICS) as well as what good looks like for all of our core services of People, Place and Corporate.
- 4.2 Consideration also needs to be given to how the council will enact the change as “one council” since the strategic drive for transformation is no longer fully governed centrally, and there is a need to know how transformation from services are joined up. It is acknowledged that transformation for modernising systems will be expensive and a phased approach will be needed.
- 4.3 There is a need for WNC to be an intelligent client when purchasing software from suppliers and their maximised implementation. There should be an industry standard software and internal business intelligence within the service area so that WNC becomes the intelligent customer. There is a need to recognise new development and there is a central architecture with the ability to add on as required.
- 4.4 The Task and Finish Group suggests there is a need to understand that processes should be mapped and this process map can be used to guide our engagement with any potential suppliers and optimise these processes.
- 4.5 The Task and Finish Group recognises that the Transformation Board oversees the key projects, and each directorate provides details of their top key projects to that board and each directorate has its own transformation programmes. It was felt that communication could, however, be improved so that there is more awareness of the progress with the key projects, in order for details to be made more accessible. There is a need for a standardised approach for staff using the systems, with Council wide design principles, in order to ensure a good user expertise. This would eliminate duplication. There should be for collaborative working across all directorates with an organisational overview of Transformation. A Member Steering Group could be set up with the key purpose of communicating transformation progress to Members and officers.
- 4.6 The Task and Finish Group is concerned that there is no central oversight Team but acknowledges that the Programme Management Office provides intelligence to the service areas. There is a need for all partners to come together, including the Children’s Trust when investigating new systems, to promote a holistic view

leading to a better shared intelligence approach to enable the Council to make smarter decisions and support wider partnership working.

- 4.7 The Task and Finish Group supports the work that is undertaken by the Business Intelligence Team but felt there is the need for a more insight and an intelligence-based approach across the council, with strong data management, to enable the Council to develop systems to support the needs of residents and ensure better outcomes.
- 4.8 An innovation manager has joined ICT and will be looking externally for ideas of best practice. The Task and Finish Group welcomes this role and the proposal to work more with anchor organisations.
- 4.9 The Task and Finish Group highlights the need for Local Authorities to be able to generate their own income streams, and therefore WNC should have a business plan in respect of upskilling the workforce and it suggests whether this expertise could be offered out to other organisations for a fee, moving forwards. This is the point that the Task and Finish Group would like the service area to aim to achieve.
- 4.10** Investment is a top priority, together with a developed standards framework. The Task and Finish Group agrees that it should be aimed that spend on ICT should be best in class. Better systems will save time and increase efficiency. Any income generated or saved should be reinvested in ICT.

West Northamptonshire Council (WNC) - ICT systems

- 4.12 It is acknowledged that information regarding revenue and capital expenditure needs to be provided, in particular around expenditure on modernising systems. There is a need for more investment into ICT and it should be a higher priority.
- 4.13 The Task and Finish Group recognises the need for decent infrastructure to be in place with the correct digital functionality.
- 4.14 It is acknowledged that many systems had not yet been aggregated and there is a roadmap of changes being developed and this is why the Council is operating so many systems, with the four former predecessor Councils having operated duplicate services.

Architecture of System and Information Security and Organisational Risks

- 4.15 The Task and Finish Group expresses its concerns regarding the delayed implementation of the new telephony system and the timeframe and pace of this project. For future projects, there is a need for a central architectural team to partner with the detailed knowledge within the service areas acknowledging it is a finite resource, and an intelligence client service will be built that can advise on suppliers for software. The Task and Finish Group is keen to grow internal

expertise, bringing in apprenticeships, train, graduate programmes for example which is part of efficiency and sustainability.

- 4.16 The need for further key technical skills are being realised, including systems architecture, user experience and technical business analysis. The Task and Finish Group acknowledges that work is underway to address the gap in these technical skills to create an appropriate structure to oversee the aggregation and modernisation of the Council's systems. It is realised that it can be a timely approach to onboard new recruits into West Northants council.
- 4.17 It is felt that there is a need for an in-house approach of growing internal expertise to be adopted, bringing in for example: apprenticeships, training, and graduate programmes, which is part of efficiency and sustainability. The Task and Finish Group agreed that there is a need for Local Authorities to be able to generate their own income streams, therefore West Northamptonshire Council should have a business plan in respect of upskilling the workforce and whether this expertise could be offered out to other organisations for a fee.
- 4.18 There is a need for a more insight and an intelligence-based approach to enable the Council to develop systems to support the needs of residents and ensure better outcomes. There is a need to reduce the equalities gap and really understand the user experience.

RECOMMENDATIONS

The above overall findings have formed the basis for the following recommendations:

The Modernising Systems Task and Finish Group recommends that:

- 5.1.1 The Council needs to increase its spend on ICT and give consideration to the appropriate percentage to be put into the budget annually; the cost of which would be found from the service areas.
- 5.1.2 The pace of transformational change in respect of digital and core systems is increased and existing processes are reviewed to maximise the potential of new systems. Cabinet is asked to review the timeline for development with a view to increasing the pace of change.
- 5.1.3 A Member Steering Group is set up with the key purpose of communicating transformation progress to both Members and Officers in order for details to be made more accessible.
- 5.1.4 A business plan in respect of skilling the workforce is devised, and consideration is given to whether this expertise could be offered out to other organisations for a fee, in the medium to longer term, as part of a monetising strategy.

5.1.5 The work to build resilience within the DTI service, particularly around the recent recommendations from the Audit Committee are prioritised and accelerated.

5.1.6 Cabinet is advised that more clarity is needed regarding the term architecture and timeframes.

Corporate Overview and Scrutiny Committee

5.1.7 Corporate Overview and Scrutiny Committee, as part of its monitoring regime, reviews the impact of this report in six months' from when Cabinet responds to the recommendations, and then as part of the Committee's agreed monitoring schedule.

West Northamptonshire Council
Corporate Overview and Scrutiny Committee
Report of the Modernising Systems Task and Finish Group

1 Purposes and Rationale

- 1.1 The purpose of this Scrutiny Spotlight Review (the Review) was to provide scrutiny input into modernising systems.

The key lines of enquiry

- To identify what good systems look like before any potential investments can be made.
- To consider both the capital and revenue expenditure required for modernising systems.
- To examine how transformation from services is joined up.
- To understand the financial consequences of not modernising systems.
- To recognise the benefits realised by modernising systems – for example, freeing up staff time and there no longer being the need to chase up data if automated.

2 Context and Background

- 2.1 Following approval of its work programme, Corporate Overview and Scrutiny Committee commissioned the Task and Finish Group to undertake the Review – Modernising Systems. A review commenced in September 2022 and concluded early in March 2023 over a series of three meetings.
- 2.2 A Task and Finish Group was established comprising the whole Committee with Councillor Stone as the Chair.

Corporate Priorities

- 2.3 This Review underpins all the Council’s corporate priorities, in particular, it directly links to *Robust Resource Management*.
- 2.4 The Task and Finish Group agreed that the following needed to be investigated and linked to the realisation of the Council’s corporate priorities:

Background data and evidence gathering – To apprise the Task and Finish Group of the elements of systems:

- System architecture

- Aggregation of systems from the four predecessor Councils: Daventry District Council, Northampton Borough Council, Northamptonshire County Council and South Northants Council
- *Future Ways of Working* model
- Cyber security monitoring systems
- Resilience of the DTI services
- Transformational change

3 Methodology and Evidence Collection

3.1 For this Review, evidence was collected from the Cabinet Member for HR and Corporate Services and senior Officers of the Council from the Corporate Services directorate, which provide and oversee the key systems that underpin the council, led by DTI (Digital, Technology and Innovation division).

3.1.1 Evidence

Senior Officers of the Council provided a wealth of information to inform the evidence base of this spotlight Review.

Salient points:

‘Complexity of the Landscape’ - The inherited systems that underpin West Northants Council reflect different operating models. District and Borough council systems included joint arrangements with councils outside of West Northants, different platforms for service fulfilment and different levels of integration that previously connected the council’s systems. In addition, West Northants Council is the lead provider of ICT and digital services to North Northamptonshire Council, Northamptonshire Children’s Trust and to Northampton Partnership Homes and Northampton Leisure Trust.

‘Systems Scope’ - There has been a full audit of all systems that are utilised by West Northants Council and service and directorate roadmaps are being developed. In addition to this, the Council continues to be part of shared services arrangements with other councils – specifically with North Northants Council, Cambridgeshire County Council and Milton Keynes council. This is governed by the Lead Authority Board. This arrangement includes payroll systems, Finance and HR systems (including ERP Gold) and other ancillary systems such as income management.

Disaggregation of services - As part of the setting up of both West and North Northamptonshire Councils there was an agreed disaggregation timetable for former county council services that were hosted by either of the two new unitaries

from Vesting Day. Each splitting service can have significant impact on underpinning systems, most notably a proposed disaggregation of DTI services themselves. Although this nominally allows each council to then shape their own services, it adds considerable cost, complexity, pressure and risk to the service.

West Northamptonshire Council's ICT systems - Across the Council there continue to be a wide range of systems and IT smaller system solutions in place. The priority roadmaps for systems transformation are under way and as contracts have come towards their end, priority integrations have taken place. Currently the Council is operating a total of approximately 800 systems, which includes various versions of systems inherited from the Council's predecessors.

Digital, Technological and Innovation (DTI) directorate Skills Analysis and the "Gartner" Model. After DTI services were aggregated into West Northants, work was done to review the skills and capability of the inherited functions. The 'Gartner' Model is an ICT industry measurement standard, reviewing the capability and the functions that a technology service will be able to perform in totality.

The Council's performance against this model was assessed by the Council's Head of Architecture, with each area of the Council's DTI service assessed in its capability and processes, and the quality of activities being undertaken and ranked against the model. This identified the need for further key technical skills, including systems architecture, user experience, cyber security and technical business analysis. Some of this is currently being addressed but more is required to support the changes required from aggregation of systems and driving greater productivity.

This also identified the importance of ensuring that the council has both a good overview of all systems and their opportunities for aggregation and reduction of duplication (**Architecture of Systems**).

It also identified that there was always the need to ensure that sufficient effort and resources were available to ensure good Information Security across the organisation and its support for partners and shared systems.

Capital and revenue expenditure - There is a difference between capital expenditure and revenue expenditure in the context of Digital, Technological and Innovation (DTI); for example, engaging in transformation activity could be capitalised when the Council is investing in new processes, new systems, and new skills. In the long term the revenue expenditure element will increase, and the capital expenditure element will decrease as the Council shifts more emphasis towards "software-as-a-service" (SaaS) systems and services and less toward physical purchased infrastructure. There is also consideration for cloud-based services procurement and the issue of revenue requirements to pay for ongoing licensing.

The Council’s Digital, Technological and Innovation Strategy - The aim is to establish West Northamptonshire Council as a leader among other Local Authorities in innovation; to harness imaginative ideas and new developments to deliver transformed public services; with a refined and redesigned offer to meet individual needs; and improve the speed and efficiency of delivery. This will involve collaborating and co-designing services, harnessing both internal expertise and partnering with communities, experts, volunteers, academics, and businesses to better use technology to improve outcomes.

“The West Way of Working” – This is a programme with elements of HR, DTI and Property. As part of the council’s approach to support all employees (Fieldworker, Fixed, Part Flexible and Flexible) and the resetting of our offices (Office Optimisation Strategy), the Council has prioritised a hardware refresh to enable staff to work flexibly from any of the Council’s office buildings and locations and from home. DTI has also focussed on resetting offices, including closing Lodge Road and migrating staff to the Abbey Centre and to other locality centres, focussing on the migration of staff, hardware and systems and the support to staff (commencing with Lodge Road). One of the Council’s key priorities from a DTI perspective is to merge the four existing networks from the legacy Councils into a single West Northamptonshire network. A capital bid is being prepared, alongside a shorter-term list of mitigations.

The Council has invested in architecture design and support to cover both people and processes, cyber security, supporting the move away from Citrix and investment in new laptops, a replacement IT help desk system, digital and televised meetings and support to the coroner’s office, fibre between office locations at the Guildhall and the office at One Angel Square, along with the disconnecting of the data centre which supported the former shared service between Cherwell District Council and the legacy South Northamptonshire Council.

Current priorities for forthcoming DTI deliverables - A new system is being scoped for Northamptonshire Children’s Trust, together with new systems for other services: registrars, revenues and benefits, legal and flexi routes.

Longer-term transformation roadmap for DTI - Future deliverables include rationalisation priorities, identifying efficiencies, for example automating back office processes and integrating existing systems, leading to a three year technology roadmap for each directorate and eventual target state planning, which envisions a 5-10 year horizon plan for an efficient, cost-optimised WNC technology estate.

The officer internal **Transformation Board** oversees the key projects, and each directorate provides details of their most significant projects and programmes to that Board. Each directorate also has its own transformation programmes and projects. There is a Digital, Technology and Innovation Strategy Board, that reports

into the overarching Transformation Board that guides the overarching transformation of DTI and enabling systems.

The Business Intelligence Team works across the Authority, produces quarterly performance reports and looks at the overarching business need together with local need. Local priorities can then be looked at from this overarching work. Strong foundations are part of the programme and helping ensure better outcomes are delivered across the Council.

Cyber Security monitoring systems - There is ongoing work around cyber security and progress was reviewed by a recent Internal Audit report. The new post of Head of Cyber Security has recently been recruited to and work continues reviewing internal and external control measures in response to the changing environment. There have been additional investments brought in to ensure the council is robust in its approach to managing current risks.

Resilience of the DTI Service - In bringing together the four legacy Councils, the inheritance of four sets of systems and ways of working had added additional complexity in light of the need to align and integrate core offices and systems. There is a lot of work being undertaken and progress was also recently reviewed by Internal Audit.

3.2 Core Questions

3.2.1 The Task and Finish Group devised a series of core questions that it put to the Cabinet Member for HR and Corporate Services (Copy at Appendix A) at its meeting on 2 March 2023.

3.2.2 Cabinet Member for HR and Corporate Services

The Cabinet Member for HR and Corporate Services attended the meeting of the Task and Finish Group on 2 March 2023 and provided responses to the core questions. Core questions as at Appendix A.

Key points of evidence:

- There is a need to update current IT systems.
- Currently, a hardware refresh is being undertaken, which will be carried out every four years. It was noted that generally when purchasing new hardware, there are newer options available to purchase as the speed of change is very high
- It is good practice for an organisation to obtain data about its customers.
- The spend on IT has reduced to £7.6 million, due to several factors such as duplication of systems. There were several historic income generation

targets, which were seen to be unrealistic, and these targets have been removed.

- Systems that can be integrated in line with the ongoing transformation of the Council to create smarter and more collaborative ways of working that users can access anywhere including: MS365 and the telephony system. The DTI service area is responsible for ensuring software systems are regularly updated and work is not duplicated.
- All desired IT Systems are not as yet in place as there are a number of legacy systems and associated issues to be worked through, such as storage and compatibility, hardware refresh and disaster recovery.
- Cloud First is an important Strategy for the Council moving forward; it is imperative to put this model in place and then invest. It is key that it is implemented correctly. The journey to Cloud First has not as yet been fully reviewed. Expertise is difficult to find but it is key that Cloud experts are employed, along with Cyber expertise. The Head of Cyber Security is now in post.
- The Council will be moving away from the Citrix system, but it will not be a hurried process. It is important that it is a thorough and proper process. The data for Children's Services is now on Cloud First.
- No one Local Authority is known for its best practice IT. Expertise is available in establishments such as the University of Northampton.
- It is not best practice for departments to have individual IT models. At West Northants Council it is established that IT services is the central command, which will be good practice going forward. It is the responsibility of IT services to manage the architecture of IT systems.
- Our DTI services comprise of many long serving, experienced staff but there is also the need for new and different skills within the service area. The Service area will undertake a transformational review. There is a need to ensure the service area has the right skill set.
- Additional resources and capacity are now in place for cyber security and cyber security is an important issue and all need to be conscious of this. A briefing on cyber security for all Councillors is scheduled. Similar briefings will be scheduled for all staff.
- It was acknowledged that the ensuring resilience of system and their integrity was a key priority as it is with every other council and business and that it was important to be fully aware of external threats and learning from other businesses and councils.
- The Authority has statutory data retention periods and must have a Data Retention Policy in place. When legacy data is migrated, it can be cleansed. Legacy data will only be stored if it is relevant, useful and legal.
- An effective overarching architecture road map for IT systems will be established this year and look at the next five years. Work has been done to

look at the pathways for each area of business and their integration. The fully resourced plan is not yet done and the modelling of costing per stage needs to be done but it is likely that this will vary, year to year.

- Officers in IT services are looking actively at systems to ascertain how they can prevent duplication, such as online and audio platforms that are being used, but the experience of the end user is also taken into consideration.
- A Working Group to oversee and provide input into the implementation of an effective architecture roadmap for IT systems would be useful.

4

Conclusions and Key Findings

After all of the evidence was collated, the following conclusions were drawn:

Transformational Change

- 4.1 Although good progress has been made to date on bringing together the new Council and stabilising service delivery, the Task and Finish Group now feel that that the pace of transformational change should be augmented from a systems integration perspective. It is essential to review the Councils existing core processes to maximise the potential of new systems and standardised core processes.
- 4.11 The Task and Finish Group acknowledges that there is a need to know and set out what good looks like before any potential investments can be made, along with the knowledge of what is both capital and revenue expenditure consequences. This includes consideration at a whole council level, taking into account the wider West Northants operating environment (e.g., work with health and the ICS) as well as what good looks like for all of our core services of People, Place and Corporate.
- 4.12 Consideration also needs to be given to how the council will enact the change as “one council” since the strategic drive for transformation is no longer fully governed centrally, and there is a need to know how transformation from services are joined up. It is acknowledged that transformation for modernising systems will be expensive and a phased approach will be needed.
- 4.13 There is a need for WNC to be an intelligent client when purchasing software from suppliers and their maximised implementation. There should be an industry standard software and internal business intelligence within the service area so that WNC becomes the intelligent customer. There is a need to recognise new development and there is a central architecture with the ability to add on as required.

- 4.14 The Task and Finish Group suggests there is a need to understand that processes should be mapped and this process map can be used to guide our engagement with any potential suppliers and optimise these processes.
- 4.15 The Task and Finish Group recognises that the Transformation Board oversees the key projects, and each directorate provides details of their top key projects to that board and each directorate has its own transformation programmes. It was felt that communication could, however, be improved so that there is more awareness of the progress with the key projects, in order for details to be made more accessible. There is a need for a standardised approach for staff using the systems, with Council wide design principles, in order to ensure a good user expertise. This would eliminate duplication. There should be for collaborative working across all directorates with an organisational overview of Transformation. A Member Steering Group could be set up with the key purpose of communicating transformation progress to Members and officers.
- 4.16 The Task and Finish Group is concerned that there is no central oversight Team but acknowledges that the Programme Management Office provides intelligence to the service areas. There is a need for all partners to come together, including the Children's Trust when investigating new systems, to promote a holistic view leading to a better shared intelligence approach to enable the Council to make smarter decisions and support wider partnership working.
- 4.17 The Task and Finish Group supports the work that is undertaken by the Business Intelligence Team but felt there is the need for a more insight and an intelligence-based approach across the council, with strong data management, to enable the Council to develop systems to support the needs of residents and ensure better outcomes.
- 4.18 An innovation manager has joined ICT and will be looking externally for ideas of best practice. The Task and Finish Group welcomes this role and the proposal to work more with anchor organisations.
- 4.19 The Task and Finish Group highlights the need for Local Authorities to be able to generate their own income streams, and therefore WNC should have a business plan in respect of upskilling the workforce and it suggests whether this expertise could be offered out to other organisations for a fee, moving forwards. This is the point that the Task and Finish Group would like the service area to aim to achieve.
- 4.20** Investment is a top priority, together with a developed standards framework. The Task and Finish Group agrees that it should be aimed that spend on ICT should be best in class. Better systems will save time and increase efficiency. Any income generated or saved should be reinvested in ICT.

West Northamptonshire Council (WNC) - ICT systems

- 4.12 It is acknowledged that information regarding revenue and capital expenditure needs to be provided, in particular around expenditure on modernising systems. There is a need for more investment into ICT and it should be a higher priority.
- 4.13 The Task and Finish Group recognises the need for decent infrastructure to be in place with the correct digital functionality.
- 4.14 It is acknowledged that many systems had not yet been aggregated and there is a roadmap of changes being developed and this is why the Council is operating so many systems, with the four former predecessor Councils having operated duplicate services.

Architecture of System and Information Security and Organisational Risks

- 4.15 The Task and Finish Group expresses its concerns regarding the delayed implementation of the new telephony system and the timeframe and pace of this project. For future projects, there is a need for a central architectural team to partner with the detailed knowledge within the service areas acknowledging it is a finite resource, and an intelligence client service will be built that can advise on suppliers for software. The Task and Finish Group is keen to grow internal expertise, bringing in apprenticeships, train, graduate programmes for example which is part of efficiency and sustainability.
- 4.16 The need for further key technical skills are being realised, including systems architecture, user experience and technical business analysis. The Task and Finish Group acknowledges that work is underway to address the gap in these technical skills to create an appropriate structure to oversee the aggregation and modernisation of the Council's systems. It is realised that it can be a timely approach to onboard new recruits into West Northants council.
- 4.17 It is felt that there is a need for an in-house approach of growing internal expertise to be adopted, bringing in for example: apprenticeships, training, and graduate programmes, which is part of efficiency and sustainability. The Task and Finish Group agreed that there is a need for Local Authorities to be able to generate their own income streams, therefore West Northamptonshire Council should have a business plan in respect of upskilling the workforce and whether this expertise could be offered out to other organisations for a fee.
- 4.18 There is a need for a more insight and an intelligence-based approach to enable the Council to develop systems to support the needs of residents and ensure better outcomes. There is a need to reduce the equalities gap and really understand the user experience

5

5.1 The Modernising Systems Task and Finish Group recommends that:

5.1.1 The Council needs to increase its spend on ICT and give consideration to the appropriate percentage to be put into the budget annually; the cost of which would be found from the service areas.

5.1.2 The pace of transformational change in respect of digital and core systems is increased and existing processes are reviewed to maximise the potential of new systems. Cabinet is asked to review the timeline for development with a view to increasing the pace of change.

5.1.3 A Member Steering Group is set up with the key purpose of communicating transformation progress to both Members and Officers in order for details to be made more accessible.

5.1.4 A business plan in respect of skilling the workforce is devised, and consideration is given to whether this expertise could be offered out to other organisations for a fee, in the medium to longer term, as part of a monetising strategy.

5.1.5 The work to build resilience within the DTI service, particularly around the recent recommendations from the Audit Committee are prioritised and accelerated.

5.1.6 Cabinet is advised that more clarity is needed regarding the term architecture and timeframes.

Corporate Overview and Scrutiny Committee

5.1.7 Corporate Overview and Scrutiny Committee, as part of its monitoring regime, reviews the impact of this report in six months' from when Cabinet responds to the recommendations, and then as part of the Committee's agreed monitoring schedule.

APPENDICES

Appendix A

Corporate Overview and Scrutiny Committee

Modernising Systems Task and Finish Group

Core Questions to the Portfolio Holder for HR and Corporate Services

The purpose of this Scrutiny Spotlight Review is to provide scrutiny input into modernising the Council's systems.

Core Questions

A series of key questions have been put together to inform the evidence base of the Task and Finish Group:

1. When do you anticipate that we will get an effective IT system in place that is satisfactory and user-friendly for officers and residents and what are the cost implications? What are the council's priorities for the next year ahead?
2. How can systems be integrated in line with the ongoing transformation of the council to create smarter and more collaborative ways of working that users can access anywhere? Who is responsible for ensuring software systems are regularly updated and work is not duplicated?
3. In terms of IT systems, how up to date are we with our systems with hardware capability, storage, speed, security, and compatibility? Do you believe the systems in place are good enough to become a high performing council?
4. Do we anticipate migrating to a cloud model or SAAS (Software as a Service) based provider to secure data and moving from capital to a revenue expenditure model? What would the timescale be for this and are officers trained in this area?
5. What are other authorities doing with best practice IT and how are they managing the revenue for this? Will we be able to have a single user service with joined up

services? For example, if a resident were to change their address this information is updated on multiple systems rather than informing each service area?

6. Why has the budget for IT been reduced this year? Would you have any recommendations about where the council needs to direct future investment and improve productivity? Should we be considering the pay scale and grading for IT staff in order to retain expertise and specialist knowledge? What are the priorities?
7. How resilient and secure do you think the IT systems are? What does our IT architecture look like and what are we doing from a security perspective to protect from any potential cyber-attack? Do we have the intelligence and skills in-house in our IT department and what training measures will be in place to ensure we can thrive?
8. With the former legacy Councils how are data sources being used and how is legacy data being securely stored and used analytically to show trends? When are we going to have a data driven organisation using tools with data warehousing with sufficient metrics for analytics?

Corporate Overview and Scrutiny Committee – Modernising Systems

Following the report by the Corporate Overview and Scrutiny Committee, the Executive Leadership Team have reviewed the recommendations and make the following observations against each of the individual recommendations.

Recommendation	Comments
<p>The Council needs to increase spend on ICT and consider the appropriate percentage to be put into the budget annually; the cost of which would be found from the service areas.</p>	<p>In relation to the Council increasing the spend on ICT and considering the appropriate percentage to be put into the budget annually; the cost of which would be found from the service areas; would have an impact on budgets.</p> <p>During the past two years, the Council has been working to right-size the budget for DTI and this has included reviewing the overall spend and realising efficiencies from improved contract spend and reducing the number of systems when services come together and use one system.</p> <p>There has also been a lot of spend assigned through the capital plan to improve the DTI offer.</p> <p>This includes investment in corporate solutions</p> <ul style="list-style-type: none"> - New hardware for all staff over the next four years - A new telephony contract for the whole organisation - Office 365 licences for all <p>There has also been considerable investment assigned to the purchase of new systems in directorates. As services aggregated from Districts and Boroughs or disaggregated from the North, ICT considerations have been developing and the moves to single systems.</p> <p>Considerable investment has already been assigned to major systems</p> <ul style="list-style-type: none"> - New Children’s Services care system - Adoption services - Adult Social Care - Education - Revenues and Benefits
<p>The pace of transformational change in respect of digital and core systems is increased and existing processes are reviewed to maximise the</p>	<p>There has been a considerable programme of digital change in place – work to improve the website, online forms, e payments and work has also been ongoing to review the disaggregation of digital services between West and North Northants Council.</p>

<p>potential of new systems. Cabinet is asked to review the timeline for development with a view to increasing the pace of change.</p>	<p>Digital support has also continued to be provided to Northampton Partnership Homes and the Children’s Trust.</p> <p>Good governance is in place that oversees digital and ICT systems change and transformation through the DTI Board, chaired by the Chief Executive.</p> <p>A core system roadmap is being developed for each directorate and for the council, with key core systems being prioritised for renewal and integration.</p> <p>For shared services there is a roadmap in place too.</p> <p>Moving forwards, there will be more business cases coming to Cabinet for system changes.</p> <p>With currently a number of core systems being used by a range of partners, the council has had to ensure that the right governance arrangements have been followed. For example, considerable work has been done in 22/23 reviewing the shared arrangements between West and North councils and the best way forward for both councils.</p> <p>As part of our office rationalisation and locality modelling, we will be developing appropriate capital bids to ensure that the buildings enable smart working.</p>
<p>A Member Steering Group is set up with the key purpose of communicating transformation progress to both Members and Officers in order for details to be made more accessible.</p>	<p>Member steering groups are very useful and give great support to the development of time limited pieces of work.</p> <p>It is suggested that a quarterly transformation and change briefing session is provided each quarter for all members</p>
<p>A business plan in respect of skilling the workforce is devised, and consideration is given to whether this expertise could be offered out to other organisations for a fee, in the medium to longer term, as part of a monetising strategy.</p>	<p>Skilling the workforce is a key priority and forms part of the Council’s People Strategy.</p> <p>The Council already provides expertise to other councils in terms of Shared Services and has Service Level Agreements in place for the Children’s Trust and NPH.</p> <p>The Council has actively supported other councils in terms of going through transforming into a unitary status.</p> <p>The idea of a costed model is a useful consideration in the medium to long term.</p>
<p>The work to build resilience within the DTI service, particularly around the recent recommendations from the Audit Committee are prioritised and accelerated.</p>	<p>Within DTI the Audit Recommendations are actively being implemented.</p> <p>Work is being done to develop a Data Strategy for the Council which will also support this area.</p>

	<p>Work will be done, in line with the rationalisation of buildings to develop a DTI plan that supports the accommodation needs of the council.</p>
<p>Cabinet is advised that more clarity is needed regarding the term architecture and timeframes.</p>	<p>In terms of a road map and alignment of systems and their integration to enable smarter ways of working, the architecture support is a key element.</p> <p>If quarterly updates to all members was agreeable, this could include an overview and understanding of the architecture function.</p>

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WEST NORTHAMPTONSHIRE COUNCIL CABINET

11 JULY 2023

CABINET MEMBER FOR HOUSING, CULTURE AND LEISURE: COUNCILLOR ADAM BROWN

Report Title	West Northamptonshire Housing Allocation Scheme – recommendations by the Children, Education and Housing Overview and Scrutiny Committee
Report Author	James Edmunds, Democratic Services Assistant Manager james.edmunds@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	26/06/2023
Chief Finance Officer (S.151)	Martin Henry	26/06/2023
Communications Lead/Head of Communications	Becky Hutson	26/06/2023

List of Appendices

None

1. Purpose of Report

- 1.1. The report presents recommendations made by the Children, Education and Housing Overview and Scrutiny Committee resulting from scrutiny of the development of a new Housing Allocation Scheme for West Northamptonshire.

2. Executive Summary

- 1.2. The Children, Education and Housing Overview and Scrutiny Committee at its meeting on 19 June 2023 carried out pre-decision scrutiny of proposals for key elements of a new Housing Allocation Scheme for West Northamptonshire. The Committee received information from, and had

discussion with the Cabinet Member for Housing, Culture and Leisure, the Housing Services Manager and the Head of Housing Strategy and Partnerships on the requirements that the Scheme would need to meet and the approaches for achieving this that were being considered.

1.3. The Committee subsequently identified various recommendations for the Cabinet to consider before it agrees the draft Housing Allocation Scheme that West Northamptonshire Council (WNC) will issue for public consultation. These recommendations are intended to strengthen the Scheme and relate to the following areas:

- Non-qualifying criteria
- Bands for assessing housing need
- Information for applicants
- Implementation of the new Scheme

3. Recommendations

3.1 It is recommended that the Cabinet:

- a) Agrees that the proposed non-qualifying criteria for the new West Northamptonshire Housing Allocation Scheme should not bar persons who have housing related debt but who are making reasonable efforts to pay it back.
- b) Agrees that the proposed non-qualifying criteria for the new West Northamptonshire Housing Allocation Scheme should deal robustly with persons who have damaged social rented housing let to them in the past.
- c) Agrees that an applicant who has at least one dependent child and is living in accommodation where the facilities are shared with others outside their own household should be placed in Band B not Band C of the proposed bands for assessing housing need within the new West Northamptonshire Housing Allocation Scheme.
- d) Agrees that the proposed bands for assessing housing need within the new West Northamptonshire Housing Allocation Scheme should include provision for an applicant who has a dependent child under 16 years old who is subject to a Child Protection Plan.
- e) Agrees that clear information regarding the affordability of properties should be made available to applicants at an early stage in the bidding process within the new West Northamptonshire Housing Allocation Scheme, ideally including an affordability calculator tool.
- f) Agrees that the go-live date for the new West Northamptonshire Housing Allocation Scheme should be scheduled for after 1 April 2024 to mitigate risks that could result from coinciding with the date when Council Tax bills are issued.

4. Reason for Recommendations

4.1 The recommendations are intended to enhance the effectiveness of the draft Housing Allocation Scheme that WNC issues for public consultation in 2023 and, ultimately, of the final Scheme that is adopted. The specific thinking behind each recommendation is set out in section 5 of the report below. The presentation of the recommendations reflects the Overview and Scrutiny function's role for the development and review of policy.

5. Report Background

- 5.1 Social rented housing provides homes for people whose needs cannot be met by the commercial housing market. All local authorities with housing responsibilities are required to operate a scheme for the allocation of social rented housing in their area. Local authorities can decide the criteria that they use to determine who is eligible for the scheme (provided that these criteria are not discriminatory). Local authorities can decide how much choice applicants have in the home they are allocated. Statutory requirements specify that people in certain circumstances must be given priority for the allocation of social rented housing: for example, a person who is homeless; who is living in insanitary, overcrowded or unsatisfactory housing conditions; or who needs to move on medical or welfare grounds. Beyond this, local authorities can decide how they will prioritise applicants. Local authorities are required to provide information to anyone interested in being allocated social rented housing and to provide assistance to make an application to anyone who may need it.
- 5.2 WNC is currently operating different housing allocation schemes inherited from the former Northampton Borough and Daventry and South Northamptonshire district councils. WNC is required to regularise this situation and adopt a common housing allocation scheme for the authority by 1 April 2024. Work to develop this new scheme is in progress. The Cabinet is due to agree a draft Housing Allocation Scheme on 11 July 2023 for public consultation during the summer, with a view to the Cabinet then agreeing the final Scheme on 14 November 2023.
- 5.3 The Children, Education and Housing Overview and Scrutiny Committee is responsible for scrutinising housing issues from May 2023. The Committee sought to carry out pre-decision scrutiny of the developing draft Housing Allocation Scheme, which it was able to do at its meeting on 19 June 2023. The meeting was attended by the Cabinet Member for Housing, Culture and Leisure, the Housing Services Manager and the Head of Housing Strategy and Partnerships. The Committee was provided with information giving an overview of the following matters:
- Statutory requirements and areas of choice for local authorities relating to housing allocation schemes
 - Local context for the development of a new West Northamptonshire Housing Allocation Scheme
 - Proposed approach on applicant choice – use of choice-based lettings with the option to allow direct allocation / nomination in particular circumstances
 - Proposed non-qualifying criteria
 - Proposed approach on assessing housing need – use of four bands (A-D) with identified criteria for placing applicants in the higher bands
 - Proposed approaches to advertising homes, for bidding by applicants and for applicants to exercise the right to request a review of decisions about an application
- 5.4 The Committee considered and provided constructive challenge on various aspects of the proposed Scheme. The Committee identified recommendations on the areas set out in this section of the report.

Proposed non-qualifying criteria

- 5.5 The Committee was advised of the criteria included in the draft Housing Allocation Scheme that would mean a person did not qualify to apply for social rented housing. The Committee questioned that one of the proposed non-qualifying criteria was persons who have housing-related debt. Committee members encouraged that the Scheme should not bar people with such debt who were making reasonable efforts to pay it back. Committee members highlighted that debt or apparent unreasonable behaviour could be connected with other difficulties that an individual was dealing with in their life. If WNC applied the non-qualifying criteria in a rigid way that did not take account of individual circumstances it could exclude people from the Scheme who most needed help. The Committee was advised that WNC would take a person-centred approach to applying the non-qualifying criteria. A person would not qualify to apply for social rented housing if they had housing-related debt and there was no evidence that they were trying to deal with it. This reflected that part of the purpose of the non-qualifying criteria was to deal with cases where a person was deliberately worsening their situation to try to increase their priority. The Scheme should support people with legitimate need.
- 5.6 A Committee member went on to urge that the proposed non-qualifying criteria should deal robustly with a tenant who irresponsibly damaged their existing home and then expected the local authority simply to provide them with another. This behaviour demonstrated a lack of respect and WNC should address it, for example, by seeking to recover the costs of repairing damage. The Committee was advised that such cases could be covered by the non-qualifying criteria relating to persons found guilty of unacceptable or unreasonable behaviour or persons who have breached tenancy conditions. The Committee agreed to recommend that the new Housing Allocation Scheme should reflect both of the issues relating to non-qualifying criteria that it had highlighted.

Proposed bands for assessing housing need

- 5.7 The Committee was given an overview of the proposed banding model that would be used to assess housing need and the criteria for placing applicants in bands A – D. The Committee questioned that an applicant with a dependent child who was living in accommodation where the facilities were shared with others would only be placed in Band C rather than being given a higher priority. The Committee sought clarification of the definition of ‘facilities’ in this context and the Cabinet Member gave the view that it might reasonably be taken to mean a bathroom or kitchen. A Committee member also raised the need to be clear about how this criteria would apply in the case of a multi-generational family sharing facilities in the same home. The Committee ultimately concluded that a dependent child sharing facilities with others outside their own household was the key factor that should be considered. The Committee further agreed that applicants in this situation should be given a higher priority than was currently proposed in the interests of children’s safety and wellbeing.
- 5.8 A Committee member emphasised that the new Housing Allocation Scheme needed to be sufficiently flexible to deal with complex family scenarios that could arise in practice. As an example, they were currently assisting a family which included two siblings of different sexes who were both subject to a Child Protection Plan. The way in which housing need was assessed should

be able to make allowances for unusual circumstances and the additional needs that could result, such as two young people not being able to share a bedroom. This could support better outcomes for young people and reduce the risk of individuals having to come into care. The Committee was advised that the additional priority given to applicants with a welfare need due to detrimental effects caused by their present accommodation would cover some cases involving unusual circumstances. WNC also needed to balance the demand for social rented housing with the available stock. However, the Committee agreed that it would be helpful for the new Housing Allocation Scheme to include a specific priority for applicants with a dependent child who was subject to a Child Protection Plan.

Provision of information for applicants

- 5.9 The Committee noted that the proposed new Housing Allocation Scheme would involve properties being advertised on a weekly cycle, on the WNC website and through a housing bulletin. Adverts would include details of a property, the tenure and rental charge and any restrictions on who could bid for it. Committee members questioned whether additional support would be available for people who might otherwise be at a disadvantage, for example, if they did not speak English well, had no access to the Internet, or were not confident dealing with forms and processes. The Committee was advised that housing officers could put in bids on behalf of applicants who needed this help, whilst the option of direct allocation / nomination could also be used when appropriate to an applicant's circumstances. Internet access was available to members of the public in libraries.
- 5.10 A Committee member referred to an example of a constituent who had successfully bid for a social rented property but had subsequently been told that they could not afford the rent after providing details of their income. It would be helpful if this financial screening could be carried out earlier so that this scenario did not occur and applicants were clear about the properties available to them in practice. The Committee was advised that the advert for an individual property should provide members of the public with all of the details necessary to make an informed choice about whether to bid for it. However, a bid should not proceed if financial assessment showed that the property would be unaffordable. The Committee encouraged that the new Housing Allocation Scheme should provide as clear as possible information about the affordability of properties to applicants. The Committee was advised that it would be difficult to give guidelines on the maximum rent that an individual could afford due to the range of factors that would have to be taken into account. However, the Cabinet Member would like to introduce an affordability calculator tool similar to those on some commercial websites.

Implementation of the new Scheme

- 5.11 The Committee was advised that WNC was required to adopt the new Housing Allocation Scheme by 1 April 2024; it did not necessarily have to launch the new Scheme on this date. A Committee member highlighted that Council Tax bills would be issued on 1 April. Launching the new Scheme on the same date could create additional risk, particularly if there were teething problems with IT systems or other processes supporting it. The Committee concluded that it could help to mitigate these risks and to manage the impact on service users if the go-live date was scheduled for slightly after 1 April.

6. Issues and Choices

- 6.1 The Cabinet is asked to consider the recommendations by the Children, Education and Housing Overview and Scrutiny Committee and to give its response to them.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 Specific recommendations set out in this report may have resources and financial implications. The Cabinet should consider these implications when producing its response to the Children, Education and Housing Overview and Scrutiny Committee as set out in paragraph 6.1 above.

7.2 Legal

- 7.2.1 Overview and Scrutiny operates within set statutory provisions, principally those deriving from the Local Government Act 2000. The role of Overview and Scrutiny is to make recommendations to the Cabinet. The Cabinet will need to reach decisions based on the usual public decision-making criteria including that members consider relevant considerations and no irrelevant considerations. The views of a relevant Overview and Scrutiny committee supported by evidence can be decided upon but Cabinet's responsibility remains to ensure that it has sufficient information to make a decision including the financial and legal implications of the specific proposals presented.

- 7.2.2 The WNC Constitution Overview and Scrutiny Procedure Rules include the following provisions relating to reports by Overview and Scrutiny committees:

6.1 *Once recommendations have been formed, an Overview and Scrutiny Committee may submit a formal report for consideration by the Cabinet (if the proposals relate to an executive function and are consistent with the existing budgetary and Policy Framework), or to the Council as appropriate (if the recommendation would require a departure from or a change to the agreed budget and Policy Framework).*

6.2 *The Council or the Cabinet shall consider the report of an Overview and Scrutiny Committee at the next available meeting. The Council or the Cabinet shall respond to that Overview and Scrutiny Committee within two months (or following the next available meeting in the case of the Council) of it being submitted.*

7.3 Risk

- 7.3.1 The recommendations set out in this report are intended to address opportunities to strengthen the proposed new Housing Allocation Scheme that were identified by the Children, Education and Housing Overview and Scrutiny Committee. In this respect the recommendations can help to mitigate the risk of the new Scheme not being as effective as possible. Recommendations relating to the assessment of housing need may have an impact on how WNC manages overall

demand on the available stock of social rented housing. The Cabinet is able to give further consideration to risks that may be connected with implementing any of the recommendations made when producing its response to the Committee.

7.4 Consultation and Communications

7.4.1 The recommendations set out in this report were informed by discussion with the relevant WNC portfolio holder and service managers, as well as by Children, Education and Housing Overview and Scrutiny Committee members' engagement with service users when carrying out their role as ward councillors.

7.5 Consideration by Overview and Scrutiny

7.5.1 The recommendations set out in in this report result from consideration of the topic area by the Children, Education and Housing Overview and Scrutiny Committee.

7.6 Climate Impact

7.6.1 None directly relating to this report.

7.7 Community Impact

7.7.1 The recommendations set out in this report are intended to have a positive impact on people applying for social rented housing in West Northamptonshire in future.

8. Background Papers

8.1 Children, Education and Housing Overview and Scrutiny Committee agenda papers – 19 June 2023

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11 July 2023

CABINET MEMBER WITH RESPONSIBILITY FOR FINANCE: COUNCILLOR MALCOLM LONGLEY

Report Title	Revenue Monitoring Provisional Outturn 2022-23
Report Author	Martin Henry, Executive Director (Finance) Martin.Henry@westnorthants.gov.uk

Contributors/Checkers/Approvers

West MO	Catherine Whitehead	21/06/2023
West S151	Martin Henry	21/06/2023
West Communications team	Becky Hutson	21/06/2023
Portfolio Owner Approval	Cllr Malcolm Longley	21/06/2023

List of Appendices

Appendix A – 2022-23 Provisional Outturn Detailed Variance Analysis by Directorate

Appendix B – Budget Savings Tracker

Appendix C – Carry Forward Requests

1. Purpose of Report

- 1.1. The report provides an assessment of the Council's provisional outturn position against its approved 2022-23 budget.

2. Executive Summary

- 1.2. West Northamptonshire Council provides a range of services to residents and businesses across the area including care to vulnerable adults and children, education, the collection and disposal of waste, household waste recycling, leisure and community wellbeing, highways, planning,

economic development, collection of council tax and business rates, housing benefit, council tax support, housing and support for the homeless.

- 1.3. Throughout 2022-23 the Council, alongside many other local authorities and organisations across the nation, has seen a significant impact on its finances as a result of external factors beyond its control. With levels of inflation reaching a 40 year high of 14.2% along with increasing demand led pressure across both Adults and Children’s social care and the lasting impact of the pandemic on service demand levels across the Council.
- 1.4. The main drivers of these cost pressures are highlighted below:
 - Inflationary and cost of living pressures impacting on the cost of providing services.
 - Ongoing financial impact of COVID allied with the withdrawal of significant COVID funds previously received.
 - Demand led and inflationary pressures within the Children’s Trust.
 - Significant pressures within Home to School Transport.
 - Demand led pressures within Adult Social Care.
 - Cost of living pay award significantly greater than the amount included at the time of setting the budget.
- 1.5. As a result of these externally driven financial challenges, throughout the year Directorate Management Teams have continually focussed on reducing the cost of service delivery in their areas to support the council to forecast spend closer in line with the budget, while ensuring that services are still delivered and that there isn’t a corresponding reduction in service provision.
- 1.6. Through stringent financial controls and management action the Council has tackled the financial challenges in a pro-active manner and delivered a forecast outturn position in line with the originally agreed budget within the context of a very challenging local and macro-economic context. At one point in the year the Council faced a £26.9m overspend against the budget but has worked hard to reduce the overspend throughout the year which is now provisionally at a £302,000 overspend on a £342.3m budget. A percentage variance of less than 0.1% on the original budget.
- 1.7. Table one summarises the 2022-23 provisional outturn position.

Table One: Forecast Outturn 2022-23 by Directorate

Directorate	Net Budget £'000	Forecast Net Spend at 31/03/23 £'000	Provisional Outturn Forecast Variance £'000	Q3 Outturn Forecast Variance £'000	Movement Since Q3 £'000	Forecast Variance against budget %
Corporate Services	23,282	22,960	(322)	(569)	247	-1.4%
Chief Executive Office	3,229	2,864	(365)	(633)	268	-11.3%
Education Services	5,014	5,000	(14)	(68)	54	-0.3%
Children's Trust	73,544	85,521	11,977	7,552	4,425	16.3%
Communities and Opportunities	12,201	12,623	422	268	154	3.5%
Adults, Communities & Wellbeing	110,504	121,173	10,669	8,972	1,697	9.7%
Place and Economy	83,195	85,172	1,977	4,814	(2,837)	2.4%
Finance Directorate	9,808	9,000	(808)	(796)	(12)	-8.2%
Cost of services	320,777	344,313	23,536	19,540	3,996	7.3%
Technical / Centrally Controlled Budgets*	21,541	11,549	(9,992)	(8,838)	(1,154)	-46.4%
Total budgeted expenditure	342,318	355,861	13,543	10,702	2,842	4.0%
Less funding	(342,318)	(355,559)	(13,241)	(6,800)	(6,441)	3.9%
Net Position 2022-23	0	302	302	3,902	(3,599)	

- Budget figures are subject to change as the closure of account process is finalised.

1.8. The provisional forecast outturn position for 2022-23 is an overspend of £0.3m after use of £10.1m of budget contingencies, which were set aside in the budget for risks that have subsequently crystallised in the current financial year. This represents a favourable movement of £3.6 m from the Quarter 3 position reported to Cabinet in February 2023. The detailed forecast variations against budget are set out in section 6.

1.9. The main reasons for the underlying pressures which Directorates have experienced throughout the financial year are;

- Increasing levels of inflation, with RPI reaching a high of 14.2% in October 2022 and reducing to 11.4% in April 2023 and with CPI reaching 11.1% in October 2022 reducing to 8.7% in April 2023.

- Increase in homelessness and the use of expensive nightly purchase temporary accommodation.
- Increase in Adult social care demand at the end of 2021-22 due to demands from hospital discharges.
- More Adults care packages and packages at higher costs reflecting both increase in complexity following COVID and market conditions. Demand is outstripping supply which is directly pushing costs up.
- The Children's Trust are seeing increasing demand for limited, and expensive placements for children with complex needs. This is driving up costs.
- The staff pay award has now been agreed and is greater than anticipated when the budget was set.
- Significant pressures relating to Home to School Transport spend.

Housing Revenue Account

- 1.10. The Housing Revenue Account is a ring-fenced account used to manage the Council's housing stock. The costs of managing and maintaining the properties, collecting rents and meeting the interest cost of monies borrowed to pay for investment in the housing stock are all charged to the housing revenue account.
- 1.11. Northampton Partnership Homes (NPH) are an arms-length management organisation and manage the Council's housing stock on its behalf, and is currently responsible for the delivery of the following services:
- Allocations and lettings
 - Repairs and maintenance
 - Housing management, including dealing with anti-social behaviour
 - Tenancy support
 - Tenant involvement
- 1.12. The financial reporting of service delivery for these areas is also supplied by NPH and are incorporated in the Council's HRA financial position for the current year.

Table Two: HRA Provisional Outturn 2022-23 by Activity

Other Funds (HRA)		Forecast Net Expenditure at 31/3/2023	Provisional Outturn Forecast Variance at 31/3/2023	Q3 Outturn Forecast Variance at 31/3/2023	Movement Since Q3	Forecast Variance Against Budget
Retained WNC Budgets	Net Budget £000	£000	£000	£000	£000	%
Dwelling Rents	(53,050)	(52,502)	548	663	(114)	-1.0%
Non-Dwelling Rents	(951)	(1,042)	(91)	(53)	(37)	9.5%
Other Charges for Services	(2,435)	(2,701)	(266)	(158)	(107)	10.9%
Contributions towards Expenditure	(16)	(10)	6	2	3	-35.6%
General Management	922	985	63	(2)	65	6.8%
Special Services	50	26	(24)	(6)	(18)	-47.7%
Rent, Rates, Taxes & Other	302	430	128	1	127	42.3%
Provision for Bad Debts	400	438	38	0	38	9.4%
General Fund Recharges	2,650	2,717	67	0	67	2.5%
Interest Capital Financing Charges	8,802	7,568	(1,234)	(1,138)	(95)	-14.0%
Depreciation (MRA)	13,500	13,500	0	0	0	0.0%
Revenue Contributions to Capital	1,238	1,224	(13)	0	(14)	-1.1%
Contributions to/from Reserves	0	0	0	366	(366)	0.0%
Total Retained Budgets	(28,588)	(29,366)	(778)	(326)	(452)	2.7%
Budgets Managed by NPH	£,000	£,000	£,000	£,000	£,000	%
Repairs & Maintenance	14,892	15,346	454	285	169	3.0%
General Management	8,469	8,602	133	(145)	278	1.6%
Special Services	5,227	5,418	191	186	5	3.7%
Total Managed Budgets	28,588	29,366	778	326	452	2.7%
Net Position	0	0	0	0	0	0

1.13. The provisional outturn variance for the HRA is a balanced position.

HRA Budgets Retained by the Council

1.14. The key movements reported since the Quarter 3 position relate to an increase in rental income and service charges over and above anticipated levels, and a reduced planned contribution to general reserves in order to offset the additional costs reported in the HRA managed budgets.

Managed Budgets

- 1.15. NPH have reported continuing pressure on the repairs and maintenance budget. This is partly due to increasing costs of raw materials and building supplies together with skill shortages in the labour market. In addition to this, the cost of legal advice and additional pension costs have put further strain on the budget since quarter 3.

Dedicated Schools Grant

- 1.16. The Dedicated Schools Grant (DSG) is a ring-fenced specific grant allocated to the Local Authority (LA) by the Government to support a range of education related services.
- 1.17. The Department for Education (DfE) currently operate a four-block funding model for funding schools and pre-16 education including early years as set out in the following table:

Dedicated Schools Grant			
Schools Block	Early Years Block	High Needs Block	Central Schools Services Block (CSSB)

- 1.18. The individual school's budgets (ISB) for academies and funding for high needs 'places' in academies (set prior to the start of academic year) are paid to academies directly from the Education Skills and Funding Agency (ESFA) reflecting the shift in responsibility for the funding of academies. This funding is taken off the DSG before the grant is paid to LAs and is termed 'recoupment'.
- 1.19. Academies are independent of the local authority and are accountable directly to the DfE. The DfE agency responsible for all school related funding is the Education and Skills Funding Agency (ESFA). Maintained schools continue to receive funding directly from the Council through the DSG.
- 1.20. The Dedicated Schools Grant (DSG) provisional outturn for 2022-23 is as follows:

Table Three – DSG

DSG Block	Gross Budget £'000	Recoupment £'000	Net Budget £'000	Provisional Outturn at 31/03/23 £'000	Provisional Outturn Forecast Variance at 31/03/23 £'000	Q3 Outturn Forecast Variance as at 31/12/22 £'000	Movement Since Q3 £'000	Variance against Net Budget %
Schools	320,549	(253,191)	67,358	67,444	86	0	86	0.1%
Early Years Provision	26,447	0	26,447	25,613	(834)	(458)	(376)	-3.2%
High Needs	61,124	(16,007)	45,117	47,084	1,967	1,554	413	4.4%
Central Schools Services Block	4,273	0	4,273	3,988	(285)	72	(357)	6.7%
Net Position 2022-23	412,393	(269,198)	143,195	144,129	934	1,168	(234)	

1.21. The DSG provisional outturn expenditure variance is an overspend of £0.93m which is a favourable movement of £0.23m from the position reported to Cabinet in February 2023.

High Needs Block

1.22. The pressure in the high needs block is made up of £1.97m overspend due to increased demand for out of county placements provision for pupils with SEND due to a growth in education, health and care plans, and an overall shortage of placements in county. The 2022-26 capital programme includes investment to increase resourced places in mainstream schools and special school expansions.

Early Years Block

1.23. The early years block is £0.83m underspent which includes a £0.86m underspend on central expenditure due to staffing vacancies. The service have developed a plan to recruit to centrally funded posts in the 2023-34 financial year to offer the sector advice, support and guidance around quality first teaching, safeguarding, SEND specialist support, transitions, funding and any other areas of need.

1.24. Three and four year old funding is underspent by £0.58m due to fewer hours claimed according to the January census figures compared to the budgeted hours. In contrast two year old funding is overspent by £0.29m due to more hours claimed.

1.25. The inclusion fund which supports early years providers in meeting the needs of individual children with SEN is £0.37m overspent with increased demand (volume and complexity) above budgeted levels.

Central Schools Service Block (CSSB)

- 1.26. The CSSB is underspent by £0.28m, largely due to a £0.15m underspend on historical teachers' redundancy and pension costs, with the remainder due to underspends on central local authority statutory teams due to staff vacancies.

Schools Block

- 1.27. The general un-ringfenced part of the schools block is overspent by £0.09m consisting of a £0.12m overspend on the pupil growth fund, which is mitigated in part by a small underspend on rates.
- 1.28. With respect to de-delegations (approved by schools' forum and ringfenced to maintained schools) the funds were underspent by a total of £0.39m across redundancy (£0.17m), school improvement activity (£0.19m) and union facilities (£0.02m). These will all be carried forward separately from the general DSG balances and Schools Forum will be consulted on the application of these funds to their specific usage in the next financial year.

3. Recommendations

- 1.29. It is recommended that the Cabinet:
- a) Note the provisional outturn position for 2022-23
 - b) Note the deliverability of West Northamptonshire Council savings requirement for 2022-23 summarised in section 9 and detailed in Appendix B
 - c) Approve the service carry forward requests in Appendix C
 - d) Delegate authority to the Executive Director – Finance in consultation with the portfolio holder for finance to utilise any budget virements to effectively manage the overall budget
 - e) Approve the agreed debt write-off requests that are greater than £25,000 as detailed in section 7

4. Reason for Recommendations

- 1.30. To update members on the financial position of the Council and ensure that the Council complies with its financial regulations.

5. Report Background

- 1.31. The Council's budget for 2022-23 is £342.3m and was approved on 24 February 2022 by Full Council, the budget includes £19.3m of efficiency and income proposals. This report sets out the Council's provisional outturn position against the approved budget.

6. Financial Overview by Directorate

- 6.1 This section of the report provides an update on the forecast variations against the 2022-23 budget. A more detailed breakdown of the 2022-23 forecast is included in Appendix A.

Corporate Services

Net Budget £23.38m

Forecast Outturn £22.96m

Forecast underspend £0.32m

Variance percentage -1.38%

- 6.2 The Corporate Services Directorate delivers services including human resources, customer services, Digital Technology and Innovation (DTI), legal, democratic and transformation services.

Summary Position 2022-23

- 6.3 The Directorate is reporting a forecast outturn position of £0.32m underspend, which is an adverse movement of £0.25m from the reported Quarter 3 position.
- 6.4 The reported position includes an overspend of £2.5m of which £1.8m is due to increases in the costs of IT contracts, and changes in service delivery. There are also legacy council income targets which cannot be met, and several services with staffing pressures. These are partially offset through one-off income and staffing underspends in other areas of Corporate Services of £1.9m.
- 6.5 Additionally, Corporate Services Management Team have identified £1.1m of mitigations which fully offsets the Corporate Services budget pressures and contributes to the wider authority budget pressures.

Movement from Quarter 3

- 6.6 The £0.2m movement from the reported Q3 position is due mainly to additional DTI contracts pressures of £0.4m, a reduction in mitigations of £0.4m due to not using one-off resources.
- 6.7 This is partially offset by additional underspends of £0.6m, of which £0.4m is due to additional income, and £0.2m due to holding staffing vacancies.
- 6.8 A carry forward request has been submitted for £0.1m in relation to additional DTI contract costs, which is included in the outturn position.

Chief Executive Services

Net Budget £3.23m

Forecast outturn £2.86m

Forecast underspend £0.37m

Variance percentage -11.30%

- 6.9 Chief Executive Office includes the Chief Executive, Assistant Chief Executive, Communications and Business Intelligence Services.

Summary Position 2022-23

- 6.10 The Directorate is reporting a forecast outturn position of £0.3m underspend, an adverse movement of £0.3m from the Quarter 3 reported position.
- 6.11 This position includes an overspend of £0.2m which in the main relates to a shortfall in service aggregation savings which was a result of assumed senior staff savings from bringing the Councils together not fully matching with the budgets that came across from the four legacy authorities.
- 6.12 This pressure is offset by £0.3m one-off income and staffing underspends due to a delay in the restructure of Business Intelligence.
- 6.13 The Management Team in Chief Executive Services have identified further mitigations of £0.2m from one off income, which contribute to reducing the pressures reported in other directorates.

Movement from Quarter 3

- 6.14 The £0.3m adverse movement from Quarter 3 is largely due to the reversal of use of one-off funding, and carry forwards, which has been partially offset by additional income and staff savings. A carry forward request for £23k has been requested and is included in the outturn position.

Education Services

Net Budget £5.0m

Forecast outturn £5.0m

Forecast underspend £0.0m

Variance percentage -0.28%

- 6.15 Education Services is made up of Council services which deliver statutory education functions against approximately 200 duties as set out in various Education and Children Acts, and regulations including, but not limited to, school quality assurance and intervention, pupil place planning and admissions, early years and special educational needs.

Summary Position 2022-23

- 6.16 Education Services are reporting a balanced position despite a worsening in the forecast outturn of £0.05m from Quarter 3.
- 6.17 The directorate has overspends of £0.7m made up of £0.4m traded income shortfall in Educational Psychology based on the latest capacity available to fulfil service level agreements, £0.1m legal cost overspend relating to SEND tribunals and compensation payments, and £0.2m of uncontrollable historical pension strain costs.
- 6.18 This is mitigated in part by underspends totalling £0.5m mainly due to staffing vacancies underspends (£0.3m).

- 6.19 In addition, the Education Service has delivered efficiency proposals which will contribute a further £0.2m of budget mitigations.

Northamptonshire Children's Trust

Net Budget £73.5m

Forecast outturn £85.5m

Forecast overspend £11.9m

Variance percentage 16.3%

- 6.20 The contract for Northamptonshire Children's Trust provides children's social care services across both West and North Northamptonshire Councils.

Summary Position 2022-23

- 6.21 Northamptonshire Children's Trust (NCT) are reporting a provisional outturn overspend totalling £21.4m against the initial approved contract sum of £137.45m. Based on the agreed contract split between West and North Northamptonshire Councils, WNCs share of the total is an overspend of £11.9m against the contract sum of £76.75m (56%). This is an adverse movement of £4.4m from the position reported in Q3.
- 6.22 The main reason for the overspend relates to placements for children in care which amounts to a total of £16.7m (£9.4m WNC share) – a total adverse movement of £7.1m from the quarter 3 position. There are increasing numbers of children coming into care in Northants due to the impact of covid and the national economic picture. The current levels of volatility, flux of emergency placements and increasing complexity of need, in addition to inflationary pressures, represent a significant financial challenge for the year ahead. This is representative of the national picture where there is a shortage of appropriate places in children's homes and with foster carers, meaning that high prices are often being paid by local authorities who are responsible for placing children in appropriate settings. The key drivers of the overspend are residential and supported accommodation placements, with the top five placements costing in excess of £10,000 per week per child.
- 6.23 There is a pressure of £1.9m in respect of a national pay award for NCT staff – the WNC share of this is £1.1m.
- 6.24 There is a pressure of £0.8m relating to The Local Government and Social Care Ombudsman decision on the historic treatment and compliance with Special Guardianship Allowance policy. The additional costs relate to the implementation of the Ombudsman decision and the backdating of payments to all Special Guardianship payments. The decision was made on the 24th of August, and the new policy and payments must be made within three months of the decision. WNC's share of this is £0.45m.
- 6.25 There are also pressures on transport costs of £0.8m (£0.45m is the WNC share), which is a result of an increase in fuel costs. The overall position has worsened by £0.1m from the previously reported position. The impact of covid led to increased transport demand for supporting children in care. Whilst work is underway in implementing transition arrangements to reduce historic

agreements, there is a risk that the inflation on transport costs could rise above current levels and the recent increase in covid infections may reduce the opportunities to lessen demand.

- 6.26 Internal foster care provision is more cost effective than paying for external placements, therefore to ensure the Trust can continue to recruit and retain internal foster carers it has been decided to provide a greater inflationary uplift to their foster carer payments (an increase from 1.5% to 4%, back dated to October 2022). This will cost an additional £0.1m of which WNC's share is £0.058m.
- 6.27 The Trust continued to use a managed social care team until the end of the financial year, which provided additional capacity to the safeguarding service, ensuring that social care caseloads continued at a manageable level. This results in an additional pressure of £0.7m, WNC's share is £0.4m.
- 6.28 The Trust continue to develop proposals to mitigate the forecast full year impact in 2023-24 of demand pressures that have materialised since agreeing the 2023-24 budgeted contract sum. This will be followed up as part of the governance arrangements between the Council and the Trust, which includes regular monitoring reports.

Movement from Quarter 3

- 6.29 Demand led placement forecasts materialising above previous forecast modelling due to higher than anticipated activity and average price increased in the final quarter makes up c£4m of the adverse movement from Q3.
- 6.30 The remaining £0.4m adverse movement is due to increased costs in other demand led budgets e.g. legal and transport.

Communities and Opportunities

Net Budget £12.20m

Forecast outturn £12.62m

Forecast overspend £0.42m

Variance percentage 3.45%

- 6.31 The Communities and Opportunities Directorate includes Housing, Leisure, Libraries, Economic Development, Regeneration and Community Safety & Engagement.

Summary Position 2022-23

- 6.32 The Directorate is forecasting an overspend of £0.42m, which is an adverse movement of £0.154m from the reported Quarter 3 position.
- 6.33 Within the overall provisional position, we continue to have a pressure in the cost of temporary accommodation. The nightly purchase costs of housing are increasing rapidly due to economic inflationary pressures totalling £1.44m, consisting of additional bed and breakfast costs and additional temporary private housing costs. This has been partially relieved by sources of external funding of £0.66m.

- 6.34 On outturn Housing Benefit subsidy loss of £0.76m was due to the higher demand for temporary accommodation for the homeless and the increasing use of expensive nightly purchase accommodation. This pressure is being directed to the Housing service where Homelessness and temporary accommodation use is managed as this is where the decision that impact the amount of subsidy loss are taken.
- 6.35 The Communities and Opportunities service aggregation saving carried forward from 2021-22 was not achievable. When the current budget was set it was assumed that restructuring throughout the directorate would deliver the savings proposal, however as transformation work is still on-going, this has resulted in a shortfall of £0.5m.
- 6.36 A contribution to the provision for bad debt for general fund housing temporary accommodation reflecting an increase in demand over the year has resulted in a £0.24m requirement to maintain an adequate provision.
- 6.37 Temporary accommodation works overspent by £0.2m as a result of incurring higher refurbishment costs around temporary accommodation properties reflected in an increased management fee to Northampton Partnership Homes.
- 6.38 The final key issue relates to a under achievement of £0.22m in management fee income for leisure services as reported in year due to current economic issues.
- 6.39 The Communities and Opportunities Management Team have delivered efficiency proposals that have contributed over £1.0m to mitigate costs pressures within the directorate.

Movement from Quarter 3

- 6.40 The movement is driven by an increase in pressure on both temporary and supported accommodation offset by further underspends including additional funding being secured to partly fund resources within economic development and further staff related savings across the Directorate.

Adult Social Care

Net Budget £110.50m

Forecast outturn £121.17m

Forecast overspend £10.67m

Variance percentage 9.65%

- 6.41 The Adult Social Care Directorate consists of services that provide support to older people or those living with disabilities or with mental or physical illness under the Care Act, to promote their independence and improve their well-being. This support enables them to manage their needs and live life to the fullest regardless of the challenges they may face as a result of their circumstances.
- 6.42 The Directorate also has responsibility for Public Health. This service was successfully disaggregated on the 1st October 2022 from the previous arrangement where Public Health was hosted in North Northants.

Summary Position 2022-23

- 6.43 The provisional outturn for the Adult Social Care Directorate is an overall £10.7m pressure against budget for 2022-23 which is an adverse movement of £1.7m from the reported Quarter 3 position. The reported pressure of £10.7m is driven largely by significant demand and cost pressures since budget setting.
- 6.44 There are undeliverable budgeted savings of £8.8m. The Strength Based Working planned savings of £4.1m has not been delivered in year as intended as even though tracked savings for 2021-22 evidenced delivery of £5m independent care budgets have not seen an associated reduction due to the increased demand the service has encountered and the overall expenditure has remained unchanged in the current year. This has been corrected in the 2023-24 Final Budget.
- 6.45 £2.9m of Admission avoidance savings, including undelivered savings brought forward from 2021-22 of £2.3m, have not been delivered in 2022-23. This is due to insufficient evidence that the targeted reduction in acute admissions has reduced Adult Social care demand in this financial year. Current new demand through the acutes is outstripping the demand management interventions put in place.
- 6.46 In addition, £0.7m of savings has not been delivered against the utilisation of in-house residential savings. The complexity of Older People requiring Residential care has increased and that has made it more difficult to place in our own residential homes as planned.
- 6.47 £1.1m shortfall of the income target from utilisation of Specialist Care Centres by NNC, this has been lower than originally expected in both Spinneyfields and Thackley Green. This has resulted in the closure of Spinneyfields, located in North Northants in January 2023.
- 6.48 There are now 500 more clients requiring care than in April 2021, a considerable increase on the 3,500 clients at that time and a clear sign of the level of demand experienced. This has resulted in a significant upturn in the level and cost of independent care packages across client cohorts of £6.7m following the publication of the 2022-23 budget. £3.3m of this is driven by cost and volume increases within Learning Disability and Mental Health cohorts. This is as a result of both the long-term impact of the pandemic and the alignment of clients to West Northants based on their ordinary residence. £3.4m of the pressures in Older Peoples services driven by higher complexity of individuals and the volumes of individuals being discharged from hospital.
- 6.49 At the height of the pandemic, there was an urgency to clear hospitals of medically fit clients and the cost of the first four weeks of these Discharge to Assess (D2A) placements was covered by Health but this has since ceased. The cessation of the national funding from the beginning of this financial year has created a budget pressure of £1.7m. The service assumed that clients discharged from hospital could be covered within existing care budgets. In addition to this there is a residual pressure of £1.0m on the Older People's Residential budgets from the D2A placements, driven by a combination of the significantly high cost per week and higher than average length of time clients has remained in these placements.
- 6.50 There are external contract pressures of £0.4m from the Adult prevention contracts, from property voids mainly as a result of the inability to fill some beds due to compatibility issues and from increased legal costs due to an increase in the number and complexity of cases. In addition, the PFI contract budget is forecast to overspend by £0.3m due to a higher than budgeted

indexation level. The Deprivation of Liberty Safeguards (DOLS) service is also reporting a pressure of £0.2m from statutory doctors' section 12 assessments.

- 6.51 There is a £0.9m pressure on client transport budgets where costs have continued to increase across the year above forecasts, Transformation resource has been assigned to look at the underlying reason for the pressure and the ability of the service to mitigate rising costs in future years.
- 6.52 The provisional outturn for in House Provider Services is an overall underspend of £0.9m, mainly driven by staff vacancies.
- 6.53 Staff vacancies in the earlier part of the year within Commissioning and Performance Service, has resulted in an underspend of £0.4m particularly in the Financial Assessment Team.
- 6.54 £1.3m of further vacancies has arisen across the Directorate due to the difficulty in recruitment across the social care sector, this has mitigated the cost pressures forecast in the last quarter. The Reablement Service went through a restructure in 2022-23, and a number of vacancies are still yet to be filled.
- 6.55 £0.4m shortfall of the income target for client contributions towards social care packages, despite an increase in demand for care. Analysis has evidenced a fall in the number of 'self funders' where individuals pay their full cost of care based on their ability to pay.
- 6.56 £6.1m of mitigations were delivered in 2022-23 that were initially identified when significant pressures emerged in the early part of the year.
- 6.57 One-off funds of £1.321m are being used to mitigate the legacy brought forward budget pressures for Spinneyfields Specialist care centre in 2022-23. On the 1st April 2021 the PFI contract for the four Specialist care centres novated to WNC alongside the operational responsibility, where two of the centres were geographically located in North Northants. Due to the location, Adults services in West found it difficult to place individuals outside of WNC in Spinneyfields, and NNC utilisation was also low. Following public consultation, the centre was closed in January 2023, although budgetary pressures remained for the financial year.

Movement from Quarter 3

- 6.58 Adult Social Care is reporting an overall increase in the revenue pressure of £1.7m from Quarter 3 to provisional outturn.
- 6.59 Overall deliverable savings have reduced by £1.8m that has been driven by the difficulty of placing clients into our in house residential homes of £0.7m due to their increasing complexity of needs against the accommodation available. A further £1.1m of savings have not been delivered due to lower utilisation by NNC of Spinneyfields and Thackley Green specialist care centres. Following consultation WNC took the decision to close Spinneyfields in January 2023 due to low occupancy and the inability to place WNC clients outside of the local authority boundary.
- 6.60 In year pressures have increased by £0.5m since Quarter 3 reports. £0.4m of this has been driven by a reduction in the level of client contributions expected due to a fall in the number of self funders. In addition, the service has cleared a backlog of financial assessments that has generated

less income than expected. Other pressures identified since Quarter 3 include an increase in the operational costs of the Specialist care centres of £0.8m including agency costs and utilities and further client transport costs of £0.2m. However, further staff vacancies in other areas of provider services of £0.6m and a fall in the independent care budget pressure of £0.4m have mitigated the overall cost pressures.

- 6.61 Underspends across Adult Social care have increased by £1.1m as a result of further staff vacancies across care management due to the difficulty of recruitment and further income from the ICB (Integrated Care Board) for reablement services.
- 6.62 Due to the significant budget pressures the service was facing earlier in the year a number of stretch savings were planned for. However, since Quarter 3 reporting £1.8m of these have not been achieved, but will be delivered across 2023-24.

Place and Economy

Net Budget £83.19m

Forecast outturn £85.17m

Forecast overspend £1.98m

Variance percentage 2.38%

- 6.63 The Place Directorate delivers services including Waste Management, Highways and Transportation, (including Home to School Transport), Asset Management (including car parking), Environment Services, Regulatory Services & Planning. The Directorate has been significantly impacted by the long-term effect of covid and the rising cost of inflation on contracts and service provision. Demand has altered because of changes in people's behaviours, and the national labour shortage in the transport market has resulted in decreased competition and a subsequent increase in operator prices.

Summary Position 2022-23

- 6.64 Overall, the Place and Economy Directorate is reporting a net overspend of £2.0m, which is a favourable movement of £2.8m from the position reported in Quarter 3.
- 6.65 Carry forwards of £0.1m are requested for planning and legal appeals which has been included in the forecast outturn position.
- 6.66 The underlying pressures in this directorate total £10m, of which Home to School transport is £5.3m due to a combination of both the long-term impact of covid on the transport market and increased fuel prices.
- 6.67 Inflationary pressures totalling £2.8m have arisen during the year due to the unforeseen increases in this area. £1.9m on energy costs across properties within Place & Economy, street lighting and traffic signals. Contract price increases due to inflation causing a pressure of £1m within the Waste Highways & Transport service.
- 6.68 The service aggregation saving carried forward from 2021-22 of £1m has not been achieved, due to delays in Service aggregation and restructuring. Transformation work is still on-going, within the Directorate and these plans are reflected within in 23-24 Budget Proposals.

- 6.69 There is an adverse variance on savings delivery proposals primarily due to project delays and pressures on income streams that have not returned to pre-covid levels. This is offset by various underspends across the directorate. The net overspend in this area is £0.3m.
- 6.70 The underlying pressures are largely being offset by underspends and mitigations totalling £8m.
- 6.71 Underspends include additional income of £1.6m across estates management (£0.6m), waste (£0.5m), highways (£0.4m) and car parks (£0.1m).
- 6.72 There are underspends on staffing as a result of the vacancy freeze and Highways & Transport disaggregation (£1.1m).
- 6.73 Due to the relatively mild winter, there was less winter maintenance activity than anticipated delivering a saving of £0.2m, our costs were £0.2m less than predicted following the final reconciliation of costs on the Inter-Authority Agreements, in addition there is a £0.1m saving due to reductions in concessionary fares as passengers numbers have not returned to pre-covid levels.
- 6.74 The waste service has seen a reduction in volumes of residual waste, which led to an underspend of £1.5m. Due to the high volume of activity within the waste service, these variances are extremely sensitive, for example a 1% change in volume of residual waste will result in a movement in expenditure of over £0.1m.
- 6.75 There are underspends within Assets and Environment totalling £1.2m relating to property management running costs, a reduction in reactive maintenance due to continued working from home arrangements, and resolution of a historic dispute with a contractor. There has been a further £0.3m reduction in net costs on the Northampton Schools PFI scheme.
- 6.76 There is a £0.1m underspend in the Planning service due to an over accrual in 2021-22.
- 6.77 The Place and Economy Management Team identified further efficiency proposals that contributed £1.4m to reduce the overall pressures within the directorate.

Movement from Quarter 3

- 6.78 Overall, the Place and Economy Directorate is reporting a favourable movement of £2.8m from the position reported in Quarter 3.
- 6.79 The waste service has seen a reduction in costs of £1.1m primarily due to less tonnages, which is the impact of the cost-of-living crisis combined with a move towards pre-covid behaviours.
- 6.80 There has been an increase in estates management rental income (£0.5m), plus additional highways income (£0.3m) off-set by a reduction in car park income (£0.1m) from forecast due to re-classification of a one-off budget.
- 6.81 There has been a further decrease in staff costs across the directorate of £0.2m due to delays with recruitment.

- 6.82 Expenditure on home to school transport has reduced by £0.2m based on journeys completed, and there is a £0.2 favourable movement following the final reconciliation of cost on the Inter Authority Agreements within highways and transport.
- 6.83 There are various net underspends across the directorate totalling £0.2m after considering the re-classification of one-off budgets not utilised during the year and carry forward requests.

Finance

Net Budget £9.81m
Forecast outturn £9.00m
Forecast underspend £0.81m
Variance percentage -8.24%

- 6.84 The Finance Directorate services include strategic finance, accountancy, revenue and benefits, procurement, and internal audit services.

Summary Position 2022-23

- 6.85 The Directorate is reporting a £0.8m underspend, with a minor favourable movement from the position reported to Cabinet in Quarter 3.
- 6.86 The Directorate underspend is made up primarily of savings on vacant posts, additional unbudgeted income and savings attributed to bringing the Internal Audit team back in house.

Technical/Centrally Held Items

Net Budget £21.54m
Forecast Outturn £11.55m
Forecast underspend £9.99m
Variance percentage -46.4%

- 6.87 Technical and centrally controlled budgets include the treasury budgets, pension deficit contribution payments for West Northants and the contingency budgets. This area will also reflect any council wide corporate cross cutting issues or opportunities.

Summary Position 2022-23

- 6.88 The Technical and Centrally Controlled Directorate are reporting an overall underspend of £9.9m against budget for 2022-23.
- 6.89 This position includes a budget pressure relating to the pay award agreed for staff which was greater than that assumed at the time of setting the budget. The Council's budgets were prepared and published in February 2022 and since then the national economic outlook materially changed with rapidly increasing inflation rates. The pressure of £3.4m is the amount over and above what was included in the February 2022 budget, which for 2022-23 was linked to the national pay offer which has recently been agreed with the Trade Unions.

- 6.90 A council wide contingency budget is managed within the centrally controlled budget which at the start of the year stood at £15.4m. This consists of disaggregation budget of £0.4m brought forward from 2021-22, pay inflation £4.9m and a general contingency of £10.1m. The Council's provisional outturn position assumes the full utilisation of £10.1m contingency budget within the position.
- 6.91 There is an underspend of £2.9m within treasury management. This underspend is due to several factors including an improved position on investment income due to higher interest rate yields, and more surplus cash being available for investment, underspends on borrowing costs due to changes in the loan portfolio and not exercising any new borrowing needs in the year, offset by pressures on finance and insurance charges.
- 6.92 There is a currently an estimated increase required to top up the aged debt provision which is resulting in an additional pressure of £0.1m. Further work is being undertaken as part of the year end accounting process to confirm the final position on the provision.

Movement from Quarter 3

- 6.93 There has been a favourable movement of £1.2m from the position reported to Cabinet in the Quarter 3 report. This is largely driven by an additional £0.8m investment returns from having more surplus cash for investment, and improved yields, as well as a reduction in insurance and external audit costs.

Funding

- 6.94 The Council's net service budget is funded from the following areas: Council Tax income, Business Rates income, Government grants, one off COVID funding and reserves. A breakdown of the funding budget is detailed below in Table Five.

Table Four

Funding	Net Budget £'000
Council Tax income	224,146
Business Rates income (including S31 Grant)	64,696
Adult Social Care Grants	22,414
Transfer from Reserves	21,464
New Homes Bonus	5,152
Services Grant 22-23	3,457
Other Government Grants	989
Total Funding	(342,318)

- 6.95 Within the funding budget it has been identified that business rates receivable (including S31 grant) will be greater than the set budget by £12.8m and this is incorporated into the provisional outturn position.
- 6.96 S31 grant is given to the council to compensate it for the loss of forgone business rates, due to reliefs given by the government. Due to the amount of growth in business rates being greater

than anticipated there is no need to hold back the S31 grant for business rates and therefore it can be released in full at this point.

- 6.97 There is an additional benefit of £0.4m due to business rates levy surplus that was confirmed in the Local Government Final Settlement.
- 6.98 The funding budget also holds the budget for the movement of reserves included within the 2022-23 Medium Term Financial Plan. As part of the closure of accounts process these movements are being assessed as to whether the reserves still need to be fully utilised in year, and therefore may be subject to change from provisional to final outturn.

7. Aged Debt

- 7.1 During 2022-23 a collectability assessment and review of the Council’s aged debt portfolio has been undertaken and following a robust review process, a number of invoices have been assessed as non collectable.
- 7.2 Customer invoices totalling £1,575k have been assessed as uncollectable. Of this value invoices totalling £750k were approved by the S151 officer for write off in 2022-23.

Table Five – Aged Debt Write Offs

	Total Write Off £k	%
Adult Social Care	470	63%
Children’s Services	136	18%
Corporate Services	77	10%
Place and Economy	34	5%
Housing	11	1%
Other	21	3%
Total	750	

- 7.3 The remaining amount of £825k relates to customer balances exceeding a total value of £25k require Cabinet approval for write-off, and subject to Cabinet approval will be written off in 2023-24. The details are set out below;
- £451k included in relation to Adults Social Care clients where all avenues of collection have been explored and exhausted.
 - Of the £451k, £231k accumulated debt in relation to deceased Adult Social Care clients, collection process exhausted and recommended for write off following collectability assessment by the debt team.
 - £220k accumulated debt in relation to Adult Social Care clients where the debt team has been advised of extenuating circumstances, legal advice has been sought and debt has been reviewed as uneconomical to pursue.

- £383k in relation to unachievable income expectations from a legacy council regeneration scheme.
- £36k accumulated debt in related to property estates management invoices due to company liquidation.

The amount of debt outstanding must regularly be reviewed and an assessment made as to whether the amounts outstanding are still collectable. The debt highlighted above and those already written off by the S151 officer are deemed not to be collectable. These will be charged to the bad debt provision and therefore do not have a direct impact on the revenue account.

8. Flexible Use of Capital Receipts

8.1 During 2022-23 the Council's Flexible Use of Capital Receipts strategy allowed the funding of specified transformation costs through the use of capital receipts as detailed below in table six.

Table Six

Transformation Project Description	2022-23 Forecast Expenditure £k	2022-23 Provisional Expenditure £k	2022-23 Forecast Savings associated with the transformation £k	Cumulative Savings £k
Transformation costs - The transformation team has been set up to deliver on going transformation and savings. The estimated cost of the team is £2.9m in 2022-23. The team will support all transformation projects. - Redundancy costs of £5m are anticipated	7,900	2,566	8,990	10,178

8.2 Within the 2022-23 provisional outturn position the Council has incurred transformation programme resource related expenditure of £2.6m against a budget of £2.9m. These costs will be funded through the use of capital receipts which will ensure that the council maintains maximum flexibility in the employment of its finances.

8.3 2022-23 redundancy costs of £1.1m have been funded from the council's transformation capitalisation direction from government rather than the future use of capital receipts.

9. Summary of savings delivery 2022-23

9.1 The Council has a savings requirement within its 2022-23 budget of £19.3m. Finance and Service Directors have undertaken a review of savings deliverability, with the summary forecast position

reported in table seven.

Table Seven

Directorate	2022-23 Savings Proposals £'000					
		RAG Analysis				
	Budgeted saving	Blue	Green	Amber	Red	Expected saving
Adults, Communities & Wellbeing	(11,711)	(5,241)	0	0	(6,470)	(11,711)
Chief Executives Office	(248)	(248)	0	0	0	(248)
Communities & Opportunities	(660)	(390)	0	0	(270)	(660)
Children's Services	(762)	(762)	0	0	0	(762)
Corporate Services	(908)	(797)	0	0	(111)	(908)
Place and Economy	(3,215)	(2,607)	0	0	(608)	(3,215)
Finance	(837)	(837)	0	0	0	(837)
Centrally controlled Budget	(966)	(966)	0	0	0	(966)
Total	(19,306)	(11,847)	0	0	(7,459)	(19,306)

Blue = Delivered and Confirmed

Green = Deliverable, on target

Amber = Deliverable, with risks

Red = Unlikely to be delivered

- 9.2 There are 15 red proposals totalling a reported pressure of £7.5m and these proposals are set out in detail in Appendix B. The largest red rated (undeliverable) savings proposal is the Adult Social Care proposal of £4.1m for strengths based working efficiencies detailed in section 6.44. The budget for 2023-24 has been amended to write out reliance on this saving going forward.

10. Implications (including financial implications) Resources and Financial

- 10.1 The resource and financial implications for West Northamptonshire Council are set out in the body of, and appendices to, this report.

Legal

- 10.2 There are no legal implications arising from the proposals. The report has been cleared by Legal Services.

Risk

- 10.3 This report sets out the provisional financial results for this financial year. As part of the local government reorganisation a number of Council services are hosted by either West Northamptonshire Council or

North Northants Council, with these services being delivered across organisations. As such there is an inter-authority charging process to ensure each organization is compensated for the delivery of these services, agreement on final charges is to be confirmed and charges are only included on a provisional basis and may be subject to change dependant on final agreement.

- 10.4 It is also important to note that this position is provisional and still dependant on the completion of both the 2021-22 and 2022-23 external audit process and therefore may be subject to further adjustment until the completion and approval of the 2021-22 Statement of Accounts.

Consultation

- 10.5 The Council carries out public consultation and communications on its annual Budget proposals. These activities took place in the months prior to the budgets being approved by Full Council in February 2022 for the 2022-23 budget.
- 10.6 Any management interventions that require a policy change will be subject to a consultation before any decision is taken where required.
- 10.7 Where consultation is necessary, full details will be presented to Cabinet separately. Cabinet can only make a decision after taking careful account of the results of such consultation in order to reach an informed decision.

Consideration by Overview and Scrutiny

- 10.8 All 2022-23 budget proposals were consulted on prior to the budget being approved by Full Council in February 2022. Budget monitoring and provisional outturn reports are also considered by the Corporate Overview and Scrutiny committee.

Climate Impact

- 10.9 All management interventions and mitigations identified within this report will be reviewed on an individual basis for any environmental impact.

Community Impact

- 10.10 This report will have a positive impact on the community by providing scrutiny on how public funds are being used to fund services for local residents in 2022-23.

Communications

- 10.11 The Council carries out public consultation and communications on its annual Budget proposals. These activities took place in the months prior to the budgets being approved by Full Council in February 2023 (for the 2022-23).

11. Background Papers

11.1 The following documents disclose important facts on which the report is based and have been relied upon in preparing the report:

- Final Budget Report and Medium Term Financial Plan, meeting of Council, 24 February 2022
[Agenda item - Final Budget 2022-23 and Medium Term Financial Plan - West Northamptonshire Council \(modern.gov.co.uk\)](#)
- Revenue monitoring Quarter 1 Report, Cabinet meeting 23rd September 2022
[Agenda for Cabinet on Friday 23rd September 2022, 6.00 pm - West Northamptonshire Council \(modern.gov.co.uk\)](#)
- Revenue monitoring Quarter 2 Report, Cabinet meeting 20th December 2022
[Agenda for Cabinet on Tuesday 20th December 2022, 6.00 pm - West Northamptonshire Council \(modern.gov.co.uk\)](#)
- Revenue monitoring Quarter 3 Report, Cabinet meeting 13th February 2023
[Agenda for Cabinet on Monday 13th February 2023, 6.00 pm - West Northamptonshire Council \(modern.gov.co.uk\)](#)

<u>Directorate</u>	<u>Appendix A - 2022-23 Provisional Outturn position by Directorate</u>	Quarter 3 2022-23 £000	Provisional Outturn 2022- 23 £000	Movement from Q3 £000
Corporate Services	Savings Delivery Pressure: 2223-B6-020 - Pressure on staff savings due to the delay in the implementation of a project driving improvements in the telephony system	111	111	0
		111	111	0
	In-Year Budget Variations – Overspends:			
	Budget pressures on Data, Technology & Innovation staffing budgets	291	70	(221)
	Additional in year IT contract costs as a result of price and volume increases	998	1,426	428
	Increase in mobile phone and data usage due to remote working	212	212	0
	Additional cost for procurement of telephony cloud service, Abacus license fee, VM Ware and CRM system.	139	142	3
	Human Resources - historical income pressures	96	146	50
	Payroll - non shared services	114	(3)	(117)
	Staffing / Agency pressures in Legal and Democratic services	194	259	65
	Income budget pressure in Legal and Democratic services mitigated by additional other income received within legal services	24	86	62
	Reduction in income forecast in Land Charges due to the slow down in the Housing Market	20	20	0
	Legacy income budgets not achievable - in Elections Services & DTI	53	145	92
	Coroner Storage costs	20	20	0
	Information Governance - salaries pressure	15	15	0
		2,176	2,538	362
	In-Year Budget Variations – Underspends:			
	Overachievement of income in the Coroners and Registrations services	(71)	(274)	(203)
	Additional Legal Services income	(158)	(164)	(6)
	Professional fees budget saving	(257)	(307)	(50)
	Land Charges income	(11)	0	11
	Saving on Annual Electoral Registration Canvass	(30)	(2)	28
	Miscellaneous small underspends across the directorate	(124)	(155)	(31)
	Transfer from consolidation contingency re staffing structure	(96)	(91)	5
	Staffing Underspends	(197)	(460)	(263)
	Additional income from Northampton Partnership Homes and Pension Fund	0	(244)	(244)
	One Off Income - Elections grant claim	(41)	(41)	0
OPUS Dividend	(31)	(31)	0	
Additional recharge to NNC for disaggregation costs within DTI	0	(55)	(55)	
Underspend across Shared Services	(275)	(148)	127	
	(1,291)	(1,972)	(681)	
Management Actions:				
Mitigating action plans	(1,565)	(1,048)	517	
Capitalising of salary costs - Customer Services	0	(59)	(59)	
	(1,565)	(1,107)	458	
Carry Forward Requests	0	108	108	
Net Position – Corporate Services	(569)	(322)	247	
Chief Executive Services	Savings Delivery Pressure: No variances to report	0	0	0
		0	0	0
	In-Year Budget Variations – Overspends:			
	Net budget pressures on service aggregation savings	144	165	21
	Other minor overspends	0	39	39
		144	204	60
	In Year Budget Variations – Underspends:			
	Business Intelligence Service one off funding to be held in reserves and not released in 2022-23.	(197)	0	197
	Income not previously included in outturn position	0	(48)	(48)
	Additional income from Public Health	0	(82)	(82)
Additional staff savings in Communications and BIPI Services	(85)	(111)	(26)	
Forecast staff savings through delaying recruitment	(38)	(39)	(1)	

<u>Directorate</u>	<u>Appendix A - 2022-23 Provisional Outturn position by Directorate</u>	Quarter 3 2022-23 £000	Provisional Outturn 2022- 23 £000	Movement from Q3 £000
	Other minor variance	(41)	(65)	(24)
		(361)	(345)	16
	Management Actions: Mitigating action plans	(416)	(247)	169
		(416)	(247)	169
	Carry Forward Requests	0	23	23
	Net Position – Chief Executive Services	(633)	(365)	268
Education Services	Savings Delivery Pressure: No variances to report	0	0	0
		0	0	0
	In-Year Budget Variations – Overspends: Shortfall in Educational Psychology traded income	260	419	159
	Increase in legal costs and compensation payments due to SEND tribunals	151	130	(21)
	Staffing Overspend due to Interim DCS costs	54	54	0
	Historical pension strain costs	46	78	32
		511	681	170
	In Year Budget Variations – Underspends: Staffing underspends due to vacancies	(366)	(336)	30
	WNC share of underspends on services hosted in NNC	0	(139)	(139)
	Penalty income above budget in Educational Entitlement team	(23)	(39)	(16)
	Underspend on non-pay expenditure	(2)	(21)	(19)
		(391)	(535)	(144)
	Management Actions: Mitigating action plans	(188)	(160)	28
		(188)	(160)	28
	Net Position – Education Services	(68)	(14)	54
Children's Trust	Savings Delivery Pressure: No variances to report	0	0	0
		0	0	0
	In-Year Budget Variations – Overspends: Northamptonshire Children's Trust demand and inflationary pressures	7,552	11,977	4,425
		7,552	11,977	4,425
	In Year Budget Variations – Underspends: No variances to report	0	0	0
		0	0	0
	Management Actions: No variances to report	0	0	0
		0	0	0
	Net Position – Children's Trust	7,552	11,977	4,425
Communities and Opportunities	Savings Delivery Pressure: 2223-B6-012 Reduction in need for high cost temporary accommodation	270	270	0
		270	270	0
	In year variations - overspend: Pressure on 2021-22 service aggregation savings	412	531	119
	Temporary Accommodation costs exceeded budget	220	780	560
	Overspend on management fees of Home Choice Lettings	105	197	92
	Reduction in management fee income from leisure centre	242	217	(25)
	Increase in contribution to the provision for bad debt for general fund housing temporary accommodation	0	241	241
	Daventry and Moulton Leisure centre operations exceeded the budget	43	43	0

Directorate	Appendix A - 2022-23 Provisional Outturn position by Directorate	Quarter 3 2022-23 £000	Provisional Outturn 2022- 23 £000	Movement from Q3 £000
	Staff related pressures relating to Communities offset within budget savings	13	0	(13)
	Housing Benefit Subsidy Pressure	423	763	340
	Disabled Facilities Grants delivered on budget	21	0	(21)
	Museum commercial income underachieved	49	48	(1)
	Shortfall of Income from Leisure Play Schemes that is not being generated due to a change in the running programme	29	29	0
		1,557	2,849	1,292
	In year variations - underspend:			
	Economic Development budget saving due to leveraging in external funding support. Additional Funding sourced to fund posts	(157)	(392)	(235)
	Various revenue budget savings within Leisure from venue hire and other budgets that relate to play schemes due to the change in programmes, other small budget savings and additional funding sourced to fund posts.	(22)	(58)	(36)
	Underspends in Community across various revenue budgets where expenditure not required, such as legacy schemes that are no longer awarded.	(25)	(96)	(71)
	Museums have identified various budget savings by deferring activities to the next financial year in museum exhibitions and museum general costs, alongside additional income achieved. Savings have been found across other areas including Marketing and Facilities	(104)	(235)	(131)
	Regeneration has identified various revenue budget savings from business rates, professional fees and other revenue costs	0	(177)	(177)
	Housing underspends from various areas including recruitment slippage leading to staffing underspends and the use of other sources of funding	(62)	(378)	(316)
	Libraries generation of additional income from the rent of space for Ukraine Hub, and other revenue savings	(37)	(210)	(173)
	Salary underspends from a vacant post not filled in Leisure and Community Grants along with salary underspends from Libraries	(137)	(137)	0
		(544)	(1,683)	(1,139)
	Management Actions:			
	Mitigating action plans	(1,015)	(1,015)	0
		(1,015)	(1,015)	0
	Net Position – Communities and Opportunities	268	422	154
Adult Social Care	Savings Delivery Pressure:			
	Improvement in utilisation of in house residential provision - only part delivery of savings target in 22-23 due to the increasing complexity of clients and the homes being un suitable to meet their needs.	0	660	660
	Admission avoidance savings, including undelivered savings brought forward from 2021-22, is also undelivered in 2022-23. This is due to the new demand through the acutes outstripping the demand management interventions put in place.	2,915	2,915	0
	The Strength Based Working planned savings were not delivered as intended even though tracked savings for 2021-22 evidenced delivery. In 2022-23 independent care budgets did not see an associated reduction due to the increased demand the service encountered where the overall expenditure remained unchanged.	4,067	4,067	0
	Income target of utilisation of SCC's from NNC	0	1,149	1,149
		6,982	8,791	1,809
	In-Year Budget Variations – Overspends:			
	Independent care demand pressure above original structural deficit identified as part of 22-23 budget process	7,052	6,646	(406)
	Loss of Discharge to Assess funding from 1st April 2022 that funded the first 4 weeks of care following hospital admission	1,691	1,691	0
	Cost of Discharge to Assess placements including those placed in March 2020 during Covid	1,000	1,000	0
	External Contracts pressures - Adult prevention contract disaggregation, Voids and Legal	414	439	25
	PFI Unitary charge budget pressure due to increased indexation	308	321	13
	Social Care Transport pressures due to cost pressures	700	866	166

<u>Directorate</u>	<u>Appendix A - 2022-23 Provisional Outturn position by Directorate</u>	Quarter 3 2022-23 £000	Provisional Outturn 2022- 23 £000	Movement from Q3 £000
	Liberty Protection Safeguards Doctors section 12 Assessments	164	166	2
	Vacancies within Safeguarding & Wellbeing services, including provider services, quality and prevention	(286)	(866)	(580)
	ASC Management	0	29	29
	Specialist Care Centres operational pressures Thackley Green & Spinneyfields	0	849	849
	Shortfall on Client Contribution Income Target	0	407	407
		11,043	11,548	505
	In Year Budget Variations – Underspends:			
	Underspends across Commissioning & Performance Teams due to vacancies	(411)	(443)	(32)
	Forecast underspends across care teams due to vacancies	(751)	(1,370)	(619)
	Social Care Reform Implementation Grant	0	(35)	(35)
	Additional ICB Funding	0	(420)	(420)
		(1,162)	(2,268)	(1,106)
	Management Actions:			
	Mitigating action plans	(7,891)	(6,081)	1,810
	Capitalisation directive for LGR	0	(1,321)	(1,321)
		(7,891)	(7,402)	489
	Net Position – Adults	8,972	10,669	1,697
Place and Economy	Savings Delivery Pressure:			
	The Northampton estate is currently being reviewed however with the current level of vacant properties it is unlikely that this additional income will be achieved.	100	100	0
	The tenanted property development saving was reliant on a third party which is now unlikely.	15	15	0
	Intensifying accommodation use - Delays in project	210	210	0
	Delays in upgrade to Street Lighting resulting in non-achievement of energy savings.	0	34	34
	Efficiencies from combining post room services from the previous authorities - delayed implementation.	0	80	80
	Additional catering income not achieved due to extended working from home arrangements.	0	5	5
	Highways Regulations fees and charges implemented were lower than proposed charges.	0	34	34
	Building control - proposal to increase income due to capacity and resource constraints. Service is restructuring during 23/24.	0	120	120
	Regulatory Services savings proposal to consolidate contracts not achieved due to resourcing and capacity constraints. Service is restructuring during 23/24.	0	10	10
		325	608	283
	In year variations - overspend:			
	Pressures on Home to School transport due to the long term impact of covid on the market (supply and price) and increased fuel costs	5,539	5,323	(216)
	Increased utilities costs for properties and non PFI street lighting.	1,185	1,071	(113)
	Increased utilities costs for PFI street lighting, traffic signals and closed landfill site.	670	790	120
	The rate of inflation applied on several contracts within Waste is higher than the budgeted assumption, causing an overspend.	703	608	(95)
	Unachievable service aggregation saving	984	984	0
	The rate of inflation applied on several contracts within Highways & Transport is higher than the budgeted assumption, causing an overspend.	337	342	5
	Additional play areas have been added to the grounds maintenance contract resulting in increased costs.	218	218	0
	Loss of income from Northampton market.	108	96	(12)
		9,744	9,432	(311)
	In year variations - underspend:			
	Net reduction in property & facilities management costs.	(558)	(635)	(77)
	Net additional income on Northampton Schools PFI.	(356)	(298)	58
	The staggered reduction of guaranteed payments to bus operators relating to Concessionary Fares will result in an underspend.	(173)	(150)	23

<u>Directorate</u>	<u>Appendix A - 2022-23 Provisional Outturn position by Directorate</u>	Quarter 3 2022-23 £000	Provisional Outturn 2022- 23 £000	Movement from Q3 £000
	Underspend on Reactive Maintenance due to continued working from home.	(131)	(123)	8
	Reduced demand led expenditure in the waste service including lower recycling costs as a result of fewer tonnages and improved gate fee costs, plus less garden waste tonnages due to dry summer.	(344)	(982)	(639)
	Net additional income across the waste service including recycle income at household waste recycling centres, uptake of green waste collections and profit share income.	(478)	(531)	(53)
	Reduction in non demand led expenditure in the waste service including delays with waste strategy work plus reduced tankering and street cleansing costs.	0	(509)	(509)
	Increase in estate management income including one-off back dated rent	(56)	(594)	(539)
	Improvement in car park income in Northampton.	(222)	(74)	148
	Net additional highways income.	(144)	(405)	(261)
	Underspends on Highways.	0	(247)	(247)
	Underspend on appeals within Development Services.	0	(106)	(106)
	Movement on final reconciliation of Highways & Transport IAA.	0	(170)	(170)
	Development Infrastructure & Funding - Duplication of IAA costs in 21/22 resulting in benefit in 22/23.	0	(105)	(105)
	Resolution of historic dispute with contractor.	(96)	(96)	0
	Net various small underspends across the directorate.	(414)	(666)	(252)
	Net underspend on staffing by delaying recruitment activity, despite agency staff covering critical roles.	(875)	(1,114)	(239)
		(3,846)	(6,805)	(2,959)
	Management Actions:			
	Changes in service provision to reduce duplication or stop non-essential spend	(240)	(240)	0
	Various underspends across the directorate	(430)	(395)	35
	Achievement of additional income	(260)	(250)	10
	Increased insurance rebate	(300)	(300)	0
	Staff savings through delaying recruitment to non-statutory posts	(179)	(179)	0
		(1,409)	(1,364)	45
	Carry Forward Requests	0	106	106
	Net Position – Place	4,814	1,977	(2,837)
Finance Directorate	Savings Delivery Pressure:			
	No variances to report	0	0	0
		0	0	0
	In year variations - overspend:			
	Subscriptions costs higher than originally budgeted	20	20	0
	Additional Income Management System costs	53	88	35
	Housing Benefit Subsidy Audit Costs	70	0	(70)
	Housing Benefit Overpayment Income	44	(101)	(145)
	Reduced income	0	49	49
	Debt recovery costs funded from Covid Funding	0	186	186
	Other minor variances	9	3	(6)
		196	245	49
	In year variations - underspend:			
	Forecast underspend on staffing due to vacancies	(427)	(342)	85
	Procurement underspends as a result of extra external income and staffing costs being lower than anticipated	(232)	(218)	14
	Savings anticipated on bringing Internal Audit service back in house, and staffing vacancies	(200)	(195)	5
	Credit from Recharges to Pension Fund	0	(87)	(87)
	Net position - Shared Services	50	160	110
	Other minor variances	(73)	(75)	(2)
		(882)	(757)	125
	Management mitigation:			
	Mitigating action plans	(110)	(110)	0

<u>Directorate</u>	<u>Appendix A - 2022-23 Provisional Outturn position by Directorate</u>	Quarter 3 2022-23 £000	Provisional Outturn 2022- 23 £000	Movement from Q3 £000
	Assumed use of non-ringfenced Covid grant	0	(186)	(186)
		(110)	(296)	(186)
	Net Position – Finance Directorate	(796)	(808)	(12)
	Cost of services	19,540	23,536	3,996
Technical /Centrally Held Budgets	Savings Delivery Pressure:			
	No reported pressures	0	0	0
		0	0	0
	In year variations - overspend:			
	Confirmed pressure on employers pay award	3,428	3,428	0
	Unachievable income budget	289	289	0
	Aged Debt increase in provision required	0	150	150
	Members allowances increase causing pressure (based on inflation applied of 6.4%)	149	145	(4)
		3,866	4,012	146
	In year variations - underspend:			
	Other minor underspends	(86)	(80)	6
	Business Rates income	0	(293)	(293)
	In year benefit identified following review of Minimum Revenue Provision (MRP) requirement	(350)	(350)	0
	External audit fees currently forecast to be under budget	(34)	(183)	(149)
	Treasury management and Insurance	(2,045)	(2,909)	(864)
		(2,515)	(3,815)	(1,300)
	Management Actions:			
	Mitigating action plans	(50)	(50)	0
		(50)	(50)	0
	Net Position – Technical/ Centrally held budgets	1,301	147	(1,154)
Funding	In year variations - underspend:			
	Business rates (Including S31 Grants)	(6,800)	(12,821)	(6,021)
	Business rates levy grant confirmed in final settlement	0	(420)	(420)
	Total Funding	(6,800)	(13,241)	(6,441)
Total WNC:		14,041	10,441	(3,599)
	<i>Use of Contingency</i>	(10,139)	(10,139)	0
	Overall Net Outturn Forecast 2022-23	3,902	302	(3,599)

West Northamptonshire Council - Budget Proposals 2022-23 to 2024-25 - efficiencies and technical changes as at period 12

Directorate	Proposal Title	Proposal Description and service impact	Category	2022/23 £k	Blue	Green	Amber	Red
Adults, Communities & Wellbeing	Strengths based working	The continuation of transformation of adult social care pathways and processes to ensure focus on client outcomes, independence, better decision making and best practice approaches to reduce delays and spend.	Efficiencies	(4,067)	0	0	0	(4,067)
Adults, Communities & Wellbeing	External funding review for Adults in house provider services	Full review of the funding opportunities for in house provider services within Adult services.	Income Generation	(2,300)	(1,151)	0	0	(1,149)
Adults, Communities & Wellbeing	Increase Vacancy Factor	Increase vacancy factor to 4%	Efficiencies	(730)	(730)	0	0	0
Chief Executives Office	Increase Vacancy Factor	Increase vacancy factor to 4%	Efficiencies	(79)	(79)	0	0	0
Children's Services	Increase Vacancy Factor	Increase vacancy factor to 4%	Efficiencies	(98)	(98)	0	0	0
Corporate Services	Increase Vacancy Factor	Increase vacancy factor to 4%	Efficiencies	(493)	(493)	0	0	0
Finance	Increase Vacancy Factor	Increase vacancy factor to 4%	Efficiencies	(168)	(168)	0	0	0
Place and Economy	Increase Vacancy Factor	Increase vacancy factor to 4%	Efficiencies	(598)	(598)	0	0	0
Adults, Communities & Wellbeing	External funding review for Adults Communities and Wellbeing	Maximise external funding opportunities across the Directorate.	Efficiencies	(1,500)	(1,500)	0	0	0
Adults, Communities & Wellbeing	Progression and Improvement of independent outcomes within Learning Disability services	Progression and Improving independent outcomes within Learning Disability services. This can result in lower cost packages as individuals become more independent.	Efficiencies	(1,000)	(1,000)	0	0	0
Place and Economy	Green waste income harmonisation	Harmonising green waste charges over the whole of WNC and bringing the management & administration of the service in house.	Income Generation	(992)	(992)	0	0	0
Centrally controlled Budget	General contingency	Delete remaining base budget contingency	Efficiencies	(966)	(966)	0	0	0
Adults, Communities & Wellbeing	Improvement in utilisation of in house residential provision	Increase utilisation of in house provider services with less reliance on the independent market for care provision	Efficiencies	(906)	(246)	0	0	(660)

Directorate	Proposal Title	Proposal Description and service impact	Category	2022/23 £k	Blue	Green	Amber	Red
Children's Services	Specialist, hearing impairment and visual impairment services	Whilst services will remain at the current level, the proposed future funding of these services is through a top slice of delegated schools and academies budgets funded from notional SEN budget from the schools block.	Efficiencies	(629)	(629)	0	0	0
Adults, Communities & Wellbeing	Review of Direct Payment accounts across all client groups	Review of Direct Payment accounts and assess whether these are meeting eligible needs and the planned outcomes for customers.	Efficiencies	(600)	(600)	0	0	0
Adults, Communities & Wellbeing	Admission avoidance service	There is a system wide drive to reduce the number of clients being admitted into hospital and the likelihood of long term social care needs.	Efficiencies	(594)	0	0	0	(594)
Communities & Opportunities	Reduction in need for high cost temporary accommodation	Reduction in need for high cost temporary accommodation through proactive and preventative case working	Efficiencies	(270)	0	0	0	(270)
Place and Economy	Intensifying accommodation use	Intensifying accommodation use	Efficiencies	(250)	(40)	0	0	(210)
Finance	Revenues and Benefits Restructure	Savings from implementing an in-house team	Efficiencies	(200)	(200)	0	0	0
Chief Executives Office	Release of disaggregation contingency	Release of disaggregation contingency in relation to Business Intelligence - additional staffing requirement included in One Off Pressures	Efficiencies	(169)	(169)	0	0	0
Place and Economy	Enterprise Zone Admin Budget Changes	Adjustments to budgets, funded from increased Business Rates income via the EZ Reserve.	Efficiencies	(167)	(167)	0	0	0
Finance	Closure of Accounts resources	Reversal of one-off budget from 21-22. Resources to ensure legacy Northamptonshire Council's prior year accounts were closed	Efficiencies	(160)	(160)	0	0	0
Finance	Review charges to other funds	Impact of increasing charges to other funds to properly reflect a fair share of corporate costs.	Income Generation	(150)	(150)	0	0	0
Place and Economy	Income from property	Generate additional income from WNC properties	Income Generation	(144)	(144)	0	0	0
Corporate Services	Customer Services - Staffing	Reduction in the numbers of customer service staff through the deletion of vacant posts and replacement with apprenticeships as necessary. This is possible due to the more effective utilisation of resources across our four hubs and by improving online and self-service alternatives.	Efficiencies	(150)	(39)	0	0	(111)

Directorate	Proposal Title	Proposal Description and service impact	Category	2022/23 £k	Blue	Green	Amber	Red
Corporate Services	Removal of two senior management posts as restructure within Digital, Technology and Innovation	Deletion of two management posts	Efficiencies	(125)	(125)	0	0	0
Communities & Opportunities	Housing	HRA recharge for leadership and management	Efficiencies	(120)	(120)	0	0	0
Place and Economy	Building control - Increased demand and increased income	Increased income from additional building control work which offsets costs of providing service.	Income Generation	(120)	0	0	0	(120)
Place and Economy	Saving from kitchen pods	Saving from kitchen pods due to expiration of the service	Efficiencies	(106)	(106)	0	0	0
Communities & Opportunities	Housing	The Homelessness Service is expected to be able to deliver this saving by reviewing the accommodation and support for residents threatened with or who are homeless	Efficiencies	(100)	(100)	0	0	0
Place and Economy	Rectifying Northampton Estate	A review of the Northampton estate could lead to increased rental income	Income Generation	(100)	0	0	0	(100)
Place and Economy	Outgoing post	Efficiencies from new hybrid mail contract	Efficiencies	(100)	(100)	0	0	0
Place and Economy	Incoming post	Efficiencies from combining post room services from the previous authorities	Efficiencies	(100)	(20)	0	0	(80)
Place and Economy	Embedded lease	Embedded lease for waste transfer station now finished, cost budget can be removed	Efficiencies	(88)	(88)	0	0	0
Place and Economy	Chester House Estate	It has been agreed the Council will exit the CHE shared service.	Efficiencies	(88)	(88)	0	0	0
Finance	Procurement disaggregation budget not required	Contingency set aside to fund disaggregation impact not required.	Efficiencies	(84)	(84)	0	0	0
Corporate Services	Registrars - Income generation / Fees & Charges review	Registrars - Income generation / Fees & Charges review	Income Generation	(80)	(80)	0	0	0
Communities & Opportunities	Housing	Optimisation of Disabled Facilities grant	Efficiencies	(78)	(78)	0	0	0
Finance	Finance disaggregation budget not required	Contingency set aside to fund disaggregation impact not required.	Efficiencies	(75)	(75)	0	0	0

Directorate	Proposal Title	Proposal Description and service impact	Category	2022/23 £k	Blue	Green	Amber	Red
Place and Economy	Events to Northampton Town Council	Northampton Town Council will deliver these services in future. There will be a staged transfer of costs.	Efficiencies	(67)	(67)	0	0	0
Place and Economy	Parking Payments	Council's parking payment systems being changed to remove the need for physical tickets and provide easier payment options for the larger car parks. This should increase use income and reduce some costs.	Efficiencies	(55)	(55)	0	0	0
Place and Economy	Regulatory Services - Commercialised service with arms length company	Income from discretionary services within environmental health, trading standards and licensing	Income Generation	(50)	(50)	0	0	0
Place and Economy	Closed landfills	Saving resulting from adopting a reactive and risk management based approach for closed landfills.	Efficiencies	(50)	(50)	0	0	0
Communities & Opportunities	Libraries	Maximising Libraries traded income	Income Generation	(42)	(42)	0	0	0
Place and Economy	Aggregation of Development Management service	Aggregation of Development Management planning services across the new WNC area	Efficiencies	(40)	(40)	0	0	0
Place and Economy	Planning and Climate Policy	Deletion of a conservation officer post, to offer an ongoing revenue saving	Efficiencies	(40)	(40)	0	0	0
Children's Services	Fees and charges	Increase in proposed Fees and Charges	Income Generation	(35)	(35)	0	0	0
Corporate Services	Paperless meetings, webcasting	Reduction in meeting management costs	Efficiencies	(35)	(35)	0	0	0
Place and Economy	Street lighting	Revenue savings resulting from Street Lighting capital investment	Efficiencies	(34)	0	0	0	(34)
Place and Economy	Increase to Highways Regulations fees and charges	It is proposed to increase Highways Regulations fees and charges by 5% to generate additional income for the Council	Income Generation	(34)	0	0	0	(34)
Communities & Opportunities	Leisure Services	Move to consolidated Leisure centre contract management approach	Efficiencies	(30)	(30)	0	0	0
Corporate Services	Legal and Democratic Service Efficiency Savings	Review of service to identify reductions in cost without impacting on service delivery	Efficiencies	(25)	(25)	0	0	0

Directorate	Proposal Title	Proposal Description and service impact	Category	2022/23 £k	Blue	Green	Amber	Red
Communities & Opportunities	Libraries	Establishing Corporate approach to Library Wi Fi	Efficiencies	(20)	(20)	0	0	0
Place and Economy	Tenanted property development	Tenanted property development	Efficiencies	(15)	0	0	0	(15)
Adults, Communities & Wellbeing	Saving from Fire and Rescue	Payment previously made to the Fire & Rescue Service for fleet management	Efficiencies	(14)	(14)	0	0	0
Place and Economy	Staff catering consistency	Institution of the same core approach to catering for staff refreshments across the Council's corporate buildings, adjusted for scale of building.	Efficiencies	(12)	(12)	0	0	0
Place and Economy	Regulatory Services consolidation of contracts	Reduction in costs from consolidating of existing service contracts	Efficiencies	(10)	0	0	0	(10)
Place and Economy	Catering Enhancements	Improved catering offer at the Council's offices should improve income.	Income Generation	(5)	0	0	0	(5)
Place and Economy	More effective fixed penalty notices	Increased income from more effective use of fixed penalty notices in environmental crime.	Income Generation	(5)	(5)	0	0	0
Place and Economy	Air Quality Officer to Increase grants	Employment of a specialist air quality to focus on development of action plans and development of grant funded work	Efficiencies	55	55	0	0	0
		Net Position		(19,306)	(11,847)	0	0	(7,459)

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Carry Forwards

Directorate	Description	Value approved (£)
Place and Economy Directorate	Decisions against developers/applicants made at Planning Committee across the old legacy areas has resulted in a number of appeals being raised against the new WNC authority. Appeals have been lodged with the authority in 22-23, with legal representation sought by WNC in the same financial year. The majority of the costs relating to inquiries will occur in 23-24, with a proportion of costs (approximately 25%) accounted for as year-end accruals.	-106,076.00
Corporate Services	The total annual software cost for the Jadu (customer service management) system in 22-23 was £144k. There is a shortfall in 23-24 funding for the software contract therefore carry forward is requested to offset this shortfall , the original budget of £36k was allocated to a different service area resulting in this not being incorporated in the overall contract baselining exercise .	-108,000.00
Chief Executive Services	This project was initiated and budgeted for in 22-23 and is critical to an upgrade to Business Objects, reporting tool for Children's Trust and Adult Social Care. This was also approved for expenditure by SRP. The third party supplier of the upgraded system has had to delay the project start date to May 2023 which is now in a new financial year. Therefore we need to carry forward the allocated budget to 23-24 of £23k.	-23,000.00
Total Carry Forward Requests approved and included in the provisional outturn		-237,076.00

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WEST NORTHAMPTONSHIRE COUNCIL CABINET

11 July 2023

**CABINET MEMBER WITH RESPONSIBILITY FOR FINANCE: CLLR MALCOLM
LONGLEY**

Report Title	General Fund and Housing Revenue Account Capital Provisional Outturn 2022-23 and Revised Capital Programmes
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Report Author	Sharon Gregory, Senior Finance Business Partner, Sharon.gregory@westnorthants.gov.uk
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Contributors/Checkers/Approvers

Monitoring Officer	Catherine Whitehead	21 June 2023
Chief Finance Officer	Martin Henry	21 June 2023
Head of Communications	Becky Hutson	21 June 2023

List of Appendices

- Appendix A – Proposed carry forwards for the GF capital programme**
- Appendix B – Proposed carry forwards for the HRA capital programme**
- Appendix C – Revised GF capital programme 2023-27**
- Appendix D – Revised HRA capital programme 2023-27**

1. Purpose of Report

- 1.1. This report sets out the 2022-23 provisional capital outturn position for West Northamptonshire Council General Fund (GF) and Housing Revenue Account (HRA), and the subsequent carry forward requests due to the rephasing of scheme expenditure. This report also provides the subsequent impact on the medium-term position and the revised Capital Programme for 2023-27 following the setting of the capital budget by Full Council on 22 February 2023.

2. Recommendations

- 2.1 It is recommended that the Cabinet:

- a) Note the 2022-23 provisional capital outturn position for the General Fund and HRA;
- b) Approve the proposed capital carry forwards for the General Fund capital programme which are required as a result of rephasing in the 2022-23 programme. These are detailed in appendix A;
- c) Approve the proposed capital carry forwards for the HRA capital programme which are required as a result of rephasing in the 2022-23 programme. These are detailed in appendix B;
- d) Note the revised General Fund capital programme for 2023-27 (appendix C) including the new schemes which have been added to the programme since the 2023-24 budget was approved in February 2023.
- e) Note the revised HRA capital programme for 2023-27 (appendix D) including the new schemes which have been added to the programme since the 2023-24 budget was approved in February 2023.

3. Reason for Recommendations

- This in accordance with the policy of the Council and Constitution;
- To ensure that the Authority complies with its financial regulations.

4. Provisional General Fund Capital Outturn 2022-23

- 4.1 This section sets out the 2022-23 provisional outturn for WNC's General Fund capital programme. The position is provisional as the annual statutory audit of accounts is still ongoing and balances are being finalised which could result in a change to the outturn position. As part of the provisional outturn process, the Council has identified the following:

- Capital expenditure incurred in year and its source of financing;
- Which capital schemes have completed;
- Which schemes have been subject to rephasing and are therefore still active, requiring a carry forward of unspent budget into 2023-24 and future years;

- 4.2 During the year the original budget for the capital programme has been revised to allow for revisions to project delivery plans, new schemes and cost variations to existing schemes. This has been done in accordance with the approved Capital Strategy and the Constitution.

- 4.3 There have been a number of movements on the 2022-23 budget between the Q3 report to February Cabinet and provisional outturn. These are shown in Table 1

Table 1 – Changes to the General Fund capital programme since Q3 February Cabinet.

Scheme	Directorate	2022-23 £k	Funding Source
<u>New Schemes</u>			
Revenues and Benefits Single Software System (approved at Cabinet 6.12.22)	Finance	494	Borrowing
Country Park ANPR Equipment. Endorsed by CAB and approved by s151 Officer 14.2.23	Place	100	Borrowing
Purchase of leasehold properties in Brackley – approved by Full Council 22.2.23	Place	2,132	Borrowing
Total New Schemes		2,726	
<u>Variations</u>			
A43 Northampton to Kettering Ph 1b. Rephasing approved by s151 Officer	Place	130	S106
Northampton Market Square – addition to existing budget Approved by Cabinet 17.1.23 (plus see virement below)	Place	3,500	CIL
Homes 2 Inspire – Children’s Home 22-23 budget approved at Full Council Feb 23. Request to bring forward some expenditure approved by s151 Officer	Children’s Trust	3	Grant
Total Variations		3,633	
<u>Virements</u>			
Northampton Town Centre Public Realm Virement to Market Square project – Approved by Cabinet 17.1.23	Place	-500	Borrowing
Market Square – virement approved by Cabinet 17.1.23	Place	500	Borrowing
Capital Improvements – Regeneration areas. Budget moved to fund a specific Regeneration Project – approved by s151	Place	-50	Borrowing
24 Guildhall Road Block – budget vired from general capital improvements budget	Place	50	Borrowing
Floor and Wall Finishes virement to specific project (The Abbey Centre) approved by s151 Officer	Place	-82	Borrowing
Boiler Replacements virement to specific project (the Abbey Centre) approved by s151 Officer		-225	Borrowing
Virement to The Abbey Centre – approved by s151 Officer		307	Borrowing
Total Virements		0	
Total		6,359	

4.4 Table 2 sets out the summary provisional outturn position for 2022-23 by Directorate, setting out the budget variations since the last reported position to Cabinet in February 2023.

Table 2 – Provisional Capital Outturn 2022-23 £k

Directorate £k	Previousl y reported Q3 Budget £k	Amend- ments as per Table 1 £k	22/23 Budget £k	22/23 Actuals £k	Propose d Carry Forward s £k	Capital Budget no longer required £k	Passport -ed Capital Funds * £k	Over/un derspen ds £k
Adults, Housing & Communities	11,828	0	11,828	10,759	-3,509	-21	0	2,461
Assets and Environment Capital	17,699	2,232	19,931	3,250	-15,934	-535	0	-212
Children's	20,825	3	20,828	7,667	-13,759	-725	1,278	45
Corporate	4,680	0	4,680	740	-3,968	-16	0	44
Economic Growth & Regeneration	27,558	3,500	31,058	7,014	-23,399	-645	0	0
Finance	732	494	1,226	368	-1,160	0	302	0
Highways and Waste Capital	54,443	130	54,573	29,249	-25,350	-5	0	31
Total	137,765	6,359	144,124	59,047	-87,079	-1,947	1,580	2,369

*Funding which is passported to other public sector bodies. This was not included in the Q3 monitoring report.

4.5 The Provisional outturn expenditure for 2022-23 is £59.0m compared to a budget of £137.8m as reported in the Q3 report.

Rephasing

4.6 It is being proposed that £87.1m of budget is to be rephased into 2023-24.

4.7 Rephasing of capital schemes are required for several reasons, including challenging external market factors, ongoing refining of the capital programme since the move to unitary status, the impact of COVID 19 and the wider current economic issues. Carry forwards of greater than £1m are detailed below:

Table 3 – Proposed carry forwards in excess of £1m

WNC GF Capital Programme	Carry forward £k	Funding Source
Northampton Market Square	10,508	Grant / CIL / Borrowing
Northampton North West Relief Road	7,534	Borrowing / CIL
Northampton Growth Management Scheme Phase 1	4,206	Grant
Provision of Secondary SEND places	3,266	Grant / Borrowing
Street Lighting Upgrade (ex- NCC assets)	2,806	Borrowing
Abington Street Redevelopments	2,728	Grant / Borrowing
Northamptonshire Superfast Broadband	2,569	Borrowing
24 Guildhall Road Block	2,317	Borrowing / Grant / External contributions
Purchase of Leasehold Properties in Brackley	2,132	Borrowing
Market Walk	2,000	Grant
Disabled Facilities Grant Northampton	1,649	Grant
LTP Integrated Transport Block 2022-23	1,588	Grant
Northampton Leisure Trust	1,517	Borrowing
Northampton Town Centre Public Realm	1,429	Grant
4-14 High March Refurbishment	1,232	Borrowing
The Abbey Centre	1,170	Borrowing
Westbridge Depot - Accommodation for NPH	1,162	Borrowing
New residential 4 bed home	1,142	Borrowing / External contributions
Tiffield SEND School	1,098	Borrowing
Active travel scheme tranche 2	1,062	Grant
	55,865	

- 4.8 A full list of rephased projects which require carry forwards into 2023-24 is shown in Appendix A which includes the reason for any rephasing.
- 4.9 The £87m rephasing outlined in Appendix A represents a significant move since the last monitoring report that went to Cabinet (February 2023) which forecast anticipated scheme rephasing of £27.6m, the majority of which was in relation to the high value projects listed above.
- 4.10 The Capital Team will continue to work with Project Managers to improve the forecasting for 2023-24 onwards. This includes redesign of the authority’s financial management system (ERP) for capital, in liaison with partner authorities (Milton Keynes, North Northants and Cambridgeshire). The aim is to design a robust self-service monitoring system for capital managers and to improve the largely manual process for the Capital Team in preparing monitoring information. This will include further engagement with managers to actively forecast their outturn and cashflow throughout the year.

4.11 The Capital Team will also be looking to undertake a formal in-year rephasing exercise as part of the budget setting process for 2024-25.

New / Removed Schemes

4.12 Since unitary, extensive reviews have been undertaken to get an understanding on the vast amount of capital projects inherited from the legacy authorities but to also establish which budgets are still required. Through this exercise, £1.9m of budget has now been removed from our capital programme. The most significant of these include:

- New ways of working - £725k. A Children's Trust budget approved for refresh of IT equipment. This has now been removed as it will be picked up within the main IT capital refresh budgets we have already in the programme.
- Northamptonshire Holistic Flood Resilience - £400k. It has been identified that this grant funded project is a mixture of revenue and capital spend. Therefore £400k has been removed to fund revenue expenditure on the project.
- Watermeadows - £295k. This project was split into three phases. It has been agreed that phase three of the project will no longer go ahead so this budget has now been removed.

Budget Variations

4.13 Overall, most schemes are still on track to be delivered within their budget envelope, however there has been an overspend of £2.37m across the capital programme.

4.14 This is predominantly due to an overspend of £2.26m against the original budget on the Community Equipment project reflecting the large demand within Social Care. It should be noted that, whilst the overspend is large compared to the original budget, the majority of this is offset by additional funding from Health and North Northamptonshire Council in year, bringing the actual unfunded overspend to £546k.

In- year Completions

4.15 In totality £30.822m of Schemes have been completed, the most significant are set out below;

- £3.512m spent on Disabled Facilities Grant, improving homes to allow citizens to remain in their homes and reduce future and ongoing care requirements. This work tends to be large scale, such as the creation of a downstairs bathroom or wet room.
- £6.93m on the provision of Community Equipment to prevent falls and allow people to live safely in their own home.
- £1.736m on schools minor works projects.
- £4.509m on potholes
- £6.693m for general highway works
- £1.055m on general property works across the WNC asset portfolio

4.16 In addition to this the £15.5m Vulcan Works Creative Hub sited opened during the year. Whilst the construction work has been completed for some time, the £670k fit out was included in the 2022-23 programme and the facility has recently become operational.

4.17 The £725k Northampton Bike Park also opened during 2022-23 and is proving to be very popular.

4.18 Significant partial scheme completions are set out below;

- £16.5m spent on the North West Relief Road. This is a single-carriageway road linking the A428 Harlestone Road with the A5199 Welford Road. This scheme is now around 50% complete.
- £1.9m spent on Superfast Broadband as part of an ongoing, county-wide scheme.
- £1.7m on redevelopment in Abington Street, Northampton. This is centred around the acquisition and redevelopment of the old British Home Stores and Marks and Spencer's building.
- £5.84m spent on planned improvements in schools across the West Northants area to increase capacity and improve facilities. Initial work has also started on the new SEND school at Tiffield.

Table 4 – Funding of the 22-23 GF capital expenditure (provisional outturn) £k

	Capital receipts	Prudential Borrowing	Internal Borrowing	S106 / CIL	Grant	Reserve	External	Total
Adults, Housing & Communities	8	2,199	79	44	3,318	-	5,111	10,759
Assets and Environment Capital	376	2,045	165	326	228	110	-	3,250
Children's	-	650	-	1,849	5,168	-	-	7,667
Corporate	-	607	-	-	-	133	-	740
Economic Growth & Regeneration	32	72	-	261	6,196	453	-	7,014
Finance	-	67	-	301	-	-	-	368
Highways and Waste Capital	38	14,765	40	2,744	11,662	-	-	29,249
Total	454	20,405	284	5,525	26,572	696	5,111	59,047

5. Revised 2023-24 Capital Programme (General Fund)

5.1 In February 2023, Full Council gave delegated authority to the Executive Director - Finance in consultation with the portfolio holder for Finance to amend the capital programme for 2023-24 going forward so that it accurately reflects issues such as rephrasing on 2022-23 projects that will need to be added to the programme, any amendments made to existing capital programmes, adjustments to accommodate any future use of capital receipts policy and for any other reason where the capital programme needs to be adjusted.

5.2 Since the budget approved at Full Council in February, there have been several changes to the capital programme. These changes are outlined below and reflect changes up until the end of April 2023:

Table 5 - Changes to the General Fund capital programme since Full Council Budget report

Scheme	Directorate	2023-24 £k	2024-25 £k	2025-26 £k	2026-27 £k	Total £k	Funding Source
<u>New Schemes</u>							
2 nd year of previously approved new scheme budget which was erroneously omitted in Full Council report - Revenues and Benefits Single Software System	Finance	144				144	Borrowing
New scheme - East Hunsbury Primary School - S106 improvement project endorsed by CAB 14/02/23 and approved by S151	Children's	124				124	S106
New scheme - Walgrave Primary School - SEND Capital Funding endorsed by CAB 14/02/23 and approved by S151	Children's	5				5	Grant
New scheme – Air Quality endorsed by CAB 20/04/23 and approved by S151	Assets and Environment Capital	30				30	Grant
Total New Schemes		303	0	0	0	303	
<u>Changes to existing schemes</u>							
Addition to existing budget - Northampton School for Boys Capacity Capital Funding endorsed by CAB 14/02/23 and approved by S151	Children's	100				100	Grant
Addition to existing budget - Kingsthorpe College Capacity Capital Funding endorsed by CAB 14/02/23 and approved by S151	Children's	200				200	Grant

Budget variation - Northampton to Kettering Phase 1b approved by S151	Highways & Waste	-130				-130	S106
Budget variation - Homes 2 Inspire - Children's Homes. £3k brought forward from 2023-24 into 2022-23. Approved by S151	Children's	-3				-3	Grant
Reduced budget based on actual funding received - Disabled Facilities Grant	Adults, Housing & Communities	-31				-31	Grant
Budget variation bring budget in line with approved Cabinet report - Street Lighting Upgrade (ex- NCC assets)	Highways & Waste	-3,118	2,271	754		-93	Borrowing
Addition to existing budget - Northampton Capacity - Duston School bulge endorsed by CAB 20/04/23 and approved by S151	Children's	200				200	Grant
Total changes to existing schemes		-2,782	2,271	754	0	243	
Rephasing							
22/23 carry forward budgets outlined in appendix A	Various	87,079				87,079	Various
Total Rephasing		87,079	0	0	0	87,079	
Total		84,600	2,271	754	0	87,625	

5.3 The full updated capital programme is shown in Appendix C. Summary information is shown in the tables below.

Table 6 - Revisions to the General Fund Capital Programme

West Northants GF Capital Budget	2023-24	2024-25	2025-26	2026-27	Total
	£k	£k	£k	£k	£k

Approved Budget 2023-24 February Full Council	101,259	60,069	19,669	10,224	191,221
New scheme approvals	303	0	0	0	303
Changes to existing scheme budgets	-2,782	2,271	754	0	243
Rephasing	87,079	0	0	0	87,079
Total	185,859	62,340	20,423	10,224	278,846
Movement	84,600	2,271	754	0	87,625

Table 7 - Revised WNC capital programme by Directorate

Revised WN Capital Programme as May 2023	Approved Capital Programme February Full Council Report	New scheme approvals	Changes to existing scheme budgets	Rephasing From 2022- 23	Total 2023-24 to 2026-27
	£k	£k	£k	£k	£k
Adults, Housing & Communities	30,167	0	-31	3,508	33,644
Assets and Environment Capital	42,378	30	0	15,934	58,342
Children's	32,717	305	321	13,760	47,103
Corporate	9,640	0	0	3,967	13,607
Economic Growth & Regeneration	21,229	0	0	23,399	44,628
Finance	1,010	0	144	1,160	2,314
Highways and Waste Capital	54,080	0	-223	25,351	79,208
Total	191,221	335	211	87,079	278,846

The funding table below has been updated to reflect the latest position.

Table 8 - Funding for the revised WNC capital programme

WN Revised Capital Financing	2023/24 £k	2024/25 £k	2025/26 £k	2026/27 £k	Total £k
Capital receipts	2,401	85	0	0	2,486
Prudential Borrowing	67,762	24,101	14,098	4,674	110,635
Internal Borrowing	595	216	0	0	811
S106**	12,462	3,750	0	0	16,212
Community Infrastructure Levy (CIL)**	18,657	1,000	393	0	20,050
Grant Funding	77,388	22,888	2,632	2,250	105,158
Funded from Reserve	347	0	0	0	347
Revenue Funding	539	0	0	0	539
External Funding	5,708	10,300	3,300	3,300	22,608
Total Funding	185,859	62,340	20,423	10,224	278,846

** Some of the s.106 and CIL funding will be received several years after the completion of the project in some cases. Those schemes will be forward funded with Discretionary funding, which will be repaid when the relevant CIL and s.106 are received. The funding table shows the eventual funding source for these, rather than the forward funding.

HRA Capital Programme Outturn 2022-23

Table 9 Provisional HRA Capital Outturn 2022-23

Programme	Previously Reported Budget at Q3 2022/23 £k	Movement to Capital Programme since Q3 2022/23 £k	Revised Budget 2022/23 £k	Actual Expenditure 2022/23 £k	Proposed Carry Forward £k	Over (Underspend) 2022/23 £k
External Improvements	19,731		19,731	15,016	(4,715)	-
Internal Works	2,466	800	3,266	4,142	876	-
Structural Works and Compliance	858	200	1,058	1,325	268	-
Disabled Adaptations	1,500		1,500	1,490	(10)	-
Environmental Improvements	2,890	(1,000)	1,890	997	(893)	-
IT Development	409		409	389	(20)	-
New Build Projects	13,886		13,886	11,254	(2,631)	-
Total Managed by NPH	41,739	-	41,739	34,614	(7,125)	-
Acquisitions, NSAP & RSAP 1,2	4,409		4,409	1,679	(2,730)	.
Total	46,148	-	46,148	36,292	(9,856)	-

Proposed Carry--forwards

5.4 The key projects which were delayed and therefore required the budget to be rephased in year to future years are the following.

- Major works External Improvements programme delays in starting the Kingsthorpe Neighbourhood works including Wave 1 Decarbonisation works - £4,715k
- Environmental Works programme - delayed re-procurement of contracts and subsequent splitting off of Fencing and Paving has meant work slipped in to 23/24 - £893k (after virement)
- New Build - Belgrave House development - £500k
- New Build – Avenue Campus – (£116k)
- New Build – New Southbridge Road development – £153k
- New Build – Berkely House - £810k
- Councils retained Acquisitions programme for Spot Purchases and Buy backs refocused into 2023-24 - £2,730k

Cost variations

5.5 Structural Works and Compliance and Internal Works major improvements have overspent due to higher demand caused by winter and emerging national issues. NPH have actioned a virement from their Environmental Improvements budget of £1m to cover some of these additional costs. The remaining overspends are proposed to be covered by bringing forward budget allocated for future years which will mean that future budget allocations need be subject to review to ensure they are sufficient. This will be carried out as part of the in year monitoring for 2023-24.

Table 10 Funding of the HRA Capital Expenditure (Provisional Outturn)

Funding Source	Major Repairs Reserve	Capital Receipts (excl 1-4-1)	Capital Receipts RTB 1-4-1	Capital Grants	Revenue Contributions	Borrowing	Total
	£k	£k	£k	£k	£k	£k	£k
Total	13,500	2,587	1,129	8,164	1,238	9,674	36,292

Table 11 – Revised HRA Capital Budget 2022/23 and Medium Term

Description	Actual 2022-23 £k	Estimate 2023-24 £k	Estimate 2024-25 £k	Estimate 2025-26 £k	Estimate 2026-27 £k	Total £k
External Improvements	15,016	15,210	7,496	6,850	10,008	54,580
Internal Works	4,142	1,840	1,840	1,840	1,840	11,500
Structural Works and Compliance	1,325	470	471	471	471	3,207
Disabled Adaptations	1,490	1,287	1,287	1,287	1,287	6,640
Environmental Improvements	997	3,038	3,038	3,038	3,038	13,150
IT Development	389	500	430	395	340	2,054
New Build/Major Projects	11,254	31,263	32,118	67,817	38,989	181,441
Total NPH Managed WNC Retained	34,614	53,609	46,680	81,697	55,975	272,573
Acquisitions, NSAP, RSAP 1,2	1,678	5,230	2,500	2,500	503	12,412
		-	-	-	-	
Total Capital Expenditure	36,292	59,839	49,180	84,197	56,476	285,985

Table 12- Funding of HRA Capital Budget 2022/23 and Medium Term

Description	Actual 2022-23 £k	Estimate 2023-24 £k	Estimate 2024-25 £k	Estimate 2025-26 £k	Estimate 2026-27 £k	Total £k
Major Repairs Reserve/Depreciation	13,500	13,699	13,585	13,494	13,726	68,004
Capital Receipts - Unrestricted	2,587	3,288	3,333	3,378	3,424	16,010
Capital Receipts - RTB 1-4-1 Receipts	1,129	8,069	4,191	8,861	7,999	30,249
Grant Funding	8,164	11,326	-	-		19,490
Revenue Contributions Earmarked Reserve	1,238	1,492	1,898	2,752	4,064	11,444
Borrowing / CFR	9,674	20,965	26,173	55,713	27,262	139,787
Total Funding	36,292	59,899	49,180	84,197	56,476	285,985

6. Implications (including financial implications)

6.1 Resources and Financial

- This report informs Cabinet of the provisional capital outturn position 2022-23 for both the General Fund and HRA. The latest capital programme outlined in this report is fully funded, either through borrowing, internal resources or external funding arrangements. Ongoing expenditure relating to these projects will be robustly challenged and monitored by Finance and the Capital and Assets Board.

6.2 Legal

- There are no legal implications arising from the proposals.

6.3 Risk

- There are a number of processes in place to robustly review, and challenge new scheme proposals and variations to existing schemes. Where required, completed projects will be subject to a 'lessons learned' exercise.

6.4 Consultation and Communications

6.5 The Council carries out public consultation and communications on its annual Budget proposals. These activities took place in the months prior to the budgets being approved by Full Council in February 2022 for the 2022/23 budget.

6.6 Any management interventions that require a policy change will be subject to a consultation before any decision is taken where required.

6.7 Where consultation is necessary, full details will be presented to Cabinet separately. Cabinet can only make a decision after taking careful account of the results of such consultation in order to reach an informed decision.

Consideration by Overview and Scrutiny

6.8 All 2022-23 budget proposals were consulted on prior to the budget being approved by Full Council in February 2022. Budget monitoring and provisional outturn reports are also considered by the Corporate Overview and Scrutiny committee.

6.9 Climate Impact

6.10 All management interventions and mitigations identified within this report will be reviewed on an individual basis for any environmental impact.

6.11 Community Impact

6.12 This report will have a positive impact on the community by providing scrutiny on how public funds are being used to fund services for local residents in 2022-23.

7. Background Papers

7.1 Final Capital Budget to West Northants Full Council – February 2023

WNC GF Capital Programme	Carry forward	Comments
Disabled Facilities Grant South Northants	513,876.68	Budget set based on grant received each year. Work undertaken based on demand. Profiling of budget to be reviewed during 23/24
Disabled Facilities Grant Northampton	1,649,719.02	Budget set based on grant received each year. Work undertaken based on demand. Profiling of budget to be reviewed during 23/25
Grants to aid voluntary services	239,150.00	Grants held and drawn down when requested
Improvements to Sports Centre Facilities	200,000.00	Work now due to take place in 23/24
Home Repair Assistance Grants	265,218.00	Grant held and drawn down when requested
Discretionary Grants - Emergency Assistance	50,000.00	Grant held and drawn down when requested
Grants - Community & District Initiatives	215,448.78	Grants/S106 held and drawn down when requested
Leisure Facilities Contract	5,769.00	Small carry forward for final payments associated with project
Improvements to Athletics Facilities at Stefan Hill Sports Park	20,109.83	Small carry forward for final payments associated with project
Adult Social Care Cygnum Replacement	34,122.80	Small carry forward for final payments associated with project
Northamptonshire Libraries Self Service Terminals	40,000.00	SRP delayed spend, project due to complete 23/24
Community Library Prog - Roade	96,069.00	Delays in putting together proposal, full spend expected 23/24
Community Library Prog - Brackley Library	5,000.00	Small carry forward for final payments associated with project
Doddridge Centre	967.20	Small carry forward for final payments associated with project
Library Management System Replacement	173,951.90	Delays caused by capacity in IT to support the project
Towcester South Primary School	627,142.78	Project progressing, profiling of budget to be reviewed during 23/24
Northampton School for Girls Extension	2,750,000.00	s77 consent to make £2.75m capital receipt available to NSG for increase in sports facilities. To be reviewed in 23/24
Magdalen College School Expansion	71,135.52	Small carry forward for final payments associated with project
Moulton School and Science College Expansion	67,015.86	Small carry forward for final payments associated with project
Schools Minor Works 22-23	689,526.01	Budget fully committed, expenditure expected 23/24
Guildenbury School	32,313.00	Small carry forward for final payments associated with project
Campion School Improvements	14,604.94	Small carry forward for final payments associated with project
Northampton Secondary School Capacity	166,732.00	Basic Needs Grant held and allocated against project, to be reviewed during 23/24
Northampton Capacity - Duston School bulge	290,912.30	Basic Needs Grant held and allocated against project, to be reviewed during 23/24
Malcolm Arnold S106 Works	26,151.00	Small carry forward for final payments associated with project
Northampton Secondary Schools Capacity – Northampton School for Girls Bulge Capacity	320,715.00	Basic Needs Grant held and allocated against project, to be reviewed during 23/24
Northampton Secondary School Capacity - Kingsthorpe College Bulge	58,880.00	Basic Needs Grant held and allocated against project, to be reviewed during 23/24
Provision of Primary SEND places	647,101.90	Profiling of budget to be reviewed during 23/24
Provision of Secondary SEND places	3,266,468.28	Profiling of budget to be reviewed during 23/24
Provision of All Through SEND places	795,861.44	Profiling of budget to be reviewed during 23/24
Wootton Park Free School Temporary Bulge Capacity	101,369.30	Basic Needs Grant held and allocated against project, to be reviewed during 23/24
Sponne School	58,239.66	Small carry forward for final payments associated with project
The Grange School	74,166.00	Budget under review to assess if still required
Barrack Road Educational Facilities	43,340.00	Budget under review to assess if still required
East Hunsbury Primary School - S106 improvement project	75,056.90	Project progressing, works expected 23/24
Harlestone Primary School - S106 improvement project	18,357.60	Project progressing, works expected 23/24
Kingsthorpe College - S106 improvement project	189,362.00	Project progressing, works expected 23/24
Tiffield SEND School	1,098,385.76	Project progressing, profiling of budget to be reviewed during 23/24
Temporary bulge capacity at Malcolm Arnold Academy	400,000.00	Basic Needs Grant held and allocated against project, to be reviewed during 23/24
Overstone Leys	406,314.35	Project progressing, profiling of budget to be reviewed during 23/24
New residential 4 bed home	1,142,792.00	Project expected to start 23/24
Independent Fostering and Adoption IT system	300,000.00	Budget under review to assess if system can be capitalised
Homes to support fostering	24,575.75	Small carry forward for final payments associated with project
Homes 2 Inspire - Childrens Homes	3,000.00	Small carry forward, project due to start 23/24
Social Care system replacement	896,077.00	Budget under review to assess if system can be capitalised
IT Transition	102,559.92	Ongoing SNC migration costs, spend expected 23/24
IT Security Solutions	85,000.00	Budget still required, carry forward and review during 23/24
Office365 Implementation	77,018.00	Budget still required, carry forward and review during 23/24
Sharepoint 2007 Migration	79,000.00	Budget still required, carry forward and review during 23/24
Low Code Platform	180,000.00	Budget still required, carry forward and review during 23/24
DTI Minor works	50,000.00	Budget still required, carry forward and review during 23/24
Future IT Infrastructure Discovery Work	160,000.00	Budget still required, carry forward and review during 23/24
PC Equipment Hardware Refresh	995,780.41	Delays in procurement, expenditure expected 23/24

Service Management Solution	128,570.16	Budget still required, carry forward and review during 23/24
Telephony & Contact Centre Replacement	793,552.00	Budget still required, carry forward and review during 23/24
SIEM Solution & Cybersecurity tools	200,000.00	Budget still required, carry forward and review during 23/24
Identity and Access Management	150,000.00	Budget still required, carry forward and review during 23/24
Replacement of End of Life Local Area Network equipment	70,000.00	Budget still required, carry forward and review during 23/24
IFRS16 Lease Right of Use Assets	538,663.00	Adoption of IFRS16 accounting standard delayed
Revenues and Benefits Capital Investments	620,897.00	Project progressing, profiling of budget to be reviewed during 23/24
Northampton North West Relief Road	7,534,040.48	Project progressing, profiling of budget to be reviewed during 23/24
DfT Highway Maintenance Needs Block 22/23	918,467.14	DfT Grant funding received each year, works expected 23/24
DfT Pothole Fund 22/23	906,723.69	DfT Grant funding received each year, works expected 23/24
LTP Integrated Transport Block 2022-23	1,588,869.37	DfT Grant funding received each year, works expected 23/24
Northampton Growth Management Scheme Phase 1	4,206,011.04	Project progressing, profiling of budget to be reviewed during 23/24
A45 Daventry Development Link Road	794,307.48	Project progressing, profiling of budget to be reviewed during 23/24
LTP Integrated Transport Block 2021-22	215,276.41	DfT Grant funding received each year, works expected 23/24
Active travel scheme tranche 2	1,062,671.30	Profiling of budget to be reviewed during 23/24
National Productivity Investment Fund(NPIF) - Cliftonville	25,218.10	Project progressing, general slippage of works
Environmental Services Contract [NBC]	230,129.21	Carry forward budget based on historic underspends on containers/bins. Possibly look to repurpose during 23/24
A43 Moulton Phase 2	326,506.00	Project progressing, general slippage of works
Smart Commuters	91,471.00	Carry forward in full to establish what's required for the scheme to proceed
Installation of Bin Holders in Laybys	74,000.00	Project delays, spend expected 23/24
Vehicle Replacement Programme	331,130.00	Further purchases expected 23/24
HCA Upton Remedial Works	423,983.44	Project progressing, profiling of budget to be reviewed during 23/24
Northampton Gateway	200,000.00	Carry forward in full to establish what's required for the scheme to proceed
Street Lighting Upgrade (ex- NCC assets)	2,806,623.00	Project due to start in 23/24 as per Full Council budget setting report
HS2 Road Safety Fund	145,259.43	Project progressing, general slippage of works
S106 Flore Traffic Calming	66,609.83	S106 budget held
S106 Former Timken, Main Rd Duston, Northampton	454,249.00	S106 budget held
S106 - Silverstone Circuit Silverstone (file 264)	415,852.00	S106 budget held
s106 Buckton Fields Northampton	311,206.00	S106 budget held
s106 Wood Burcote Court Towcester	255,118.00	S106 budget held
S106 Monksmoor Daventry	242,521.00	S106 budget held
UU Sailsbury Landscape Boughton Road Moulton	205,800.00	S106 budget held
S106 - Wootton Fields Ph3 (file 449)	133,803.00	S106 budget held
S106 Radstone Fields, Brackley	132,282.00	S106 budget held
S106 Harlestone Rd Northampton	130,794.00	S106 budget held
S106 Overstone Leys	120,420.00	S106 budget held
S106 West Station Rd Long Buck	115,584.00	S106 budget held
S106 land at Brackmills (Bedford Rd Roxhill) Npt	101,535.00	S106 budget held
S106 Buckton Fields West	73,340.00	S106 budget held
S106 Apex Park	72,570.00	S106 budget held
s106 Ashton Road (pianoforte) Roade	61,978.00	S106 budget held
S106 - Bective Sch Whiston Rd, Kingshorpe Npt (file 431)	67,253.00	S106 budget held
S106 Cary Close Moulton (DWH)	55,473.00	S106 budget held
S106 Camp Hill Bugbrooke	39,589.00	S106 budget held
s106 Booth Rise North Npt	40,712.00	S106 budget held
S106 Overthorpe Rd M40 Banbury	32,575.00	S106 budget held
S106 Foxhills Brackley	31,207.00	S106 budget held
S106 Towcester Vale SUE	30,648.00	S106 budget held
S106 Emmanuel Church Sc. Site, Billing Brook Road	29,717.00	S106 budget held
S106 Chaplins Yd Stratford Road Roade	29,069.00	S106 budget held
s106 Wootton Fields Northampton (335)	26,272.00	S106 budget held
S106 - Peace Hill Bugbrooke (file 343)	26,095.00	S106 budget held
S106 Summerhouse Rd Moulton Park	24,500.00	S106 budget held
S106 Old Greens Norton Rd Tow	23,919.00	S106 budget held
s106 Nth of Ford - Royal Oak Way South, Daventry	20,097.00	S106 budget held

S106 Npt Lane Moulton	15,000.00	S106 budget held
S106 Site 7 Edgar Mobbs Npt	14,910.00	S106 budget held
S106 Watford Lodge Watford	14,700.00	S106 budget held
DCOb DIRFT 3, Hilmorton	10,456.00	S106 budget held
S106 Towcester Rd Old Stratford	10,359.00	S106 budget held
S106 Danes Camp Way Northampton	4,976.00	S106 budget held
S106 65 Byfield Rd Woodford Ha	2,571.00	S106 budget held
S106 GlebeFm Yelvertoft WindFm	1,979.00	S106 budget held
S106 Grosees QueensPark Kingsth	1,542.00	S106 budget held
S106 Banbury Lane KingsSutton	5,871.00	S106 budget held
S106 Former Allotments N-P Rd	5,916.00	S106 budget held
S106 Dockham Way Crick	5,650.00	S106 budget held
s106 Byfield Road, Woodford Halse (306)	5,297.00	S106 budget held
Northampton Market Square	10,508,475.55	Project progressing, works expected 23/24
Northamptonshire Superfast Broadband	2,569,285.00	NNC completing works, project is progressing. Look to reprofile during 23/24
Vulcan works	201,463.59	Carry forward for final payments related to project
Abington Street Redevelopments	2,728,485.55	Project progressing, works expected 23/24
Watermeadows	10,000.00	Carry forward for final payments related to project
Northampton Bike Park	91,516.96	Carry forward for final payments related to project
Old Black Lion	340,682.94	Project progressing, works expected 23/24
Extension of 78 Derngate	40,000.00	Small carry forward for final payments
24 Guildhall Road Block	2,317,625.91	Project progressing, works expected 23/24
Heritage Gateway	12,751.00	Small carry forward for final payments
Sponne Arcade	378,239.37	Project progressing, works expected 23/24
Market Walk	2,000,000.00	Works not expected until 23/24
Marefare Heritage Gateway	770,750.00	Project progressing, works expected 23/24
Northampton Town Centre Public Realm	1,429,485.80	Project progressing, works expected 23/24
Northamptonshire Holistic Flood Resilience	328,855.62	Project progressing, general slippage of works
Town Centre Vision - Cinema Site 1	284,307.00	Project complete, carry forward balance and look to repurpose
Homelessness Temporary Accommodation	843,854.50	Wider plan being pulled together on this project
Northampton Leisure Trust	1,517,314.96	Project progressing, general slippage of works
Daventry to Braunston Cycle Track	170,341.28	Requires working with CRT, awaiting final outcome of CRT feasibility work. Works expected 23/24
Operational Buildings - Enhancements	406,069.94	Carry forward and look to merge with minor works budget
4-14 High March Refurbishment	1,232,779.85	Current scope of project under review, and likely to come back to Cabinet in 23/24
Property Minor Works 2019-20	864.13	General slippage, budgeted works committed 23/22
Property Minor Works 2020-21	13,807.51	General slippage, budgeted works committed 23/23
Property Minor Works 2022-23	179,965.63	General slippage, budgeted works committed 23/24
Guildhall Boilers	281,996.43	General slippage, works expected 23/24
St Michaels MSCp lift refurbishment	253,830.00	Carry forward in full to establish what's required for the scheme to proceed
Middlemore Infrastructure Completion Works	81,258.92	Project complete, carry forward balance and look to repurpose
Long Buckby Flood Management	104,037.66	General slippage, works expected 23/24
Racecourse Enhancement	19,877.59	Small carry forward for final payments associated with project
Community Youth Provision	104,160.29	Carry forward and look to repurpose
Public toilets refurbishment	20,650.84	Carry forward and look to repurpose
Parks, Allotments and Cemeteries funded by external contributions	11,784.30	General slippage, works expected 23/24
Car Park Extension St John's Square and Chapel Lane	10,000.00	General slippage, works expected 23/24
New Rehabilitation Building	39,918.53	Delays in resolving defective car park issues, progressing towards adjudication. Works expected 23/24
Refurbishment of Paved Areas	86,000.00	Liaison with conservation officer required regarding planning permission. Works expected 23/24
Heartlands commercial new build	6,503.10	Project complete, carry forward balance and look to repurpose
Monksmoor Primary School	34,137.25	Dependant on Monksmoor Primary School and when they wish to draw down funds
Rainsbrook Crematorium enhancements	71,500.00	Dependant on Rainsbrook and when they wish to draw down funds
Middlemore Cycle/Rural Tracks	67,945.90	Requires agreement with Highways on scope of works. Carry forward and possibly look to repurpose
Lodge Farm Community Centre	23,898.68	Small carry forward for final payments
Commercial Landlord Responsibilities	1,429.80	Small carry forward for final payments
Heartlands completion works	46,198.30	Requires agreement with Highways on scope of works - works expected 23/24

Refurbishment of paths and structures for open spaces	40,474.75	Planning consent still required - delayed with spend expected 23/24
Capital Works to 68 and 68a High St	20,664.90	To be investigated further to see what further work is required
Elgar Centre M&E	15,000.00	Estates team producing wider plan
DCP refurbishment programme	1,930.00	Small carry forward for final payments
Middlemore Landscape Completion Works	31,000.00	Dependant on councils landscape providers ability to undertake works. Works expected 23/24
Guildhall Roof	18,086.09	Project complete, carry forward balance and look to repurpose
Country Park - Capital Costs	2,594.00	Small carry forward for final payments
Westbridge Depot - Accommodation for NPH	1,162,366.77	Project on hold, whilst decisions are made on suitable locations
Northampton Leisure Centres Fire Assessment Works	348,705.00	Scope of works being designed, works expected 23/24
County Hall Refurbishment/Improvements	944,898.30	Delays/general slippage of work - Design team has been appointed
Central Library Refurbishment	406,299.24	General slippage, works expected 23/24
LED Replacement Lighting Scheme	121,772.00	Carry forward to allow for schedule of work to be assessed
Death Management Services	383,815.82	Project now progressing, professional consultants appointed for design works
Dallington Cemetery Extension	257,992.50	Project progressing, general slippage of works
Floor and wall finishes replacement/ renewal	683,528.49	Delays/general slippage of work
Bridge Replacement Works	90,024.00	Procurement in progress, works expected 23/24
Magistrates Court and Hazelrigg House Roof Repairs	44,190.20	Works commenced to make warm, safe and dry. Listed status may delay full works
Southfields Community Centre Refurbishment	90,000.00	On hold, pending further decisions on what to do with building
Abington Museum Boilers	261,302.75	Works delayed till spring for warmer weather
Restoration of Historic Monuments & Statues	87,128.36	General slippage, works expected 23/24
EPC Improvennts to Leased Buildings	150,000.00	Estates team producing wider plan
Purchase of Leasehold Properties in Brackley	2,132,000.00	Budget approved late in year, purchase due in 23/24
Country Parks ANPR Equipment	100,000.00	Works expected 23/24
The Abbey Centre	1,170,044.77	Project progressing, profiling of budget to be reviewed during 23/24
Daventry Leisure Centre	996,800.00	Project progressing, profiling of budget to be reviewed during 23/24
Active Traffic Management and Air Quality	130,000.00	General slippage
	87,079,408.59	

WNC HRA Capital Programme	Carry forward	Comments
Budgets Managed by NPH	£	
New Build Schemes		
NPH0011 Berkeley House & St. Marys House	810,417.62	Contactors started on site last quarter 2023/24
NPH0051 Derwent Drive, Kings Heath	374,120.86	Contactors started on site last quarter 2023/24
NPH0055 Belgrave House / Clock House	500,287.77	Re-configuration of project specification has delayed the start
NPH0062 Glebeland Road, Dallington	164,094.72	Contactors started on site last quarter 2023/24
NPH0068 Ringway (3), Briar Hill	12,341.73	Small carry forward due to pre-contract delays
NPH0076 New Southbridge Road	152,587.95	Re-configuration of project specification has held up the start
NPH0082 Avenue Campus	(115,601.59)	Re-profiling of budget due expenditure being ahead of schedule
NPH0083 Montague Crescent, Duston	19,964.25	Further feasibility review due to rising costs
NPH0091 East Oval, Kings Heath	87,661.03	Further feasibility review due to changes in contract specification
NPH0092 Upper Thrift Street, Town Centre	48,001.56	Design specification and changes to procurement negotiations
NPH0093 Wessex Way, Abington	9,734.04	Small carry forward due to pre-contract delays
NPH0095 Stanley Road, St James	223,692.95	Further feasibility review due to changes in contract specification
NPH0097 Ecton Brook Care Home	10,014.77	Small carry forward due to pre-contract delays
NPH0098 Harefield Road, Blackthorn	333,892.94	Further feasibility review due to rising costs
Other Capital Projects		
External Improvements	4,714,905.31	Delays in the start of the Kingsthorpe Neighbourhood decarbonisation programme
Internal Works	(1,675,981.64)	Work on major improvements overspent to due increased material costs
Structural Works and Compliance	(467,554.77)	Overspend due to higher demand for structural repairs during the winter months
Disabled Adaptations	9,637.94	Small carry forward to meet the exceptional demand for disabled adaptations
Environmental Improvements	1,893,176.14	Delay in the re-procurement of contracts
IT Development	19,650.59	Minor delays to the introduction of the 24/7 self service customer portal
WNC Retained Capital Budgets		
Buybacks and Spot Purchases	2,730,426.09	Buy programme to resume in 2023/24
Total HRA Capital Carry-Forwards	9,855,470.26	

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WNC GF Capital Programme	2023/24	2024/25	2025/26	2026/27	Total 2022/23 - 2026/27
Adults, Housing & Communities					
Disabled Facilities Grant South Northants	990,183	0	0	0	990,183
Disabled Facilities Grant Northampton	3,246,233	0	0	0	3,246,233
Disabled Facilities Grant Daventry	486,118	2,589,981	2,250,000	2,250,000	7,576,099
Community Equipment	4,700,000	4,700,000	4,700,000	4,700,000	18,800,000
A45/Ecton Lane Fencing	150,000	0	0	0	150,000
Ecton Lane Site Improvements	500,000	500,000	0	0	1,000,000
Grants to aid voluntary servies	239,150	0	0	0	239,150
Improvements to Sports Centre Facilities	200,000	0	0	0	200,000
Home Repair Assistance Grants	420,218	155,000	0	0	575,218
Discretionary Grants - Emergency Assistance	50,000	0	0	0	50,000
Grants - Community & District Initiatives	300,449	85,000	0	0	385,449
Lilbourne Rural Exception Scheme	0	0	0	0	0
Leisure Facilities Contract	20,769	22,500	0	0	43,269
Homelessness Reduction Act	10,000	0	0	0	10,000
Choice Based letting	5,000	5,000	0	0	10,000
Improvements to Athletics Facilities at Stefan Hill Sports Park	20,110	0	0	0	20,110
Adult Social Care Cygnum Replacement	34,123	0	0	0	34,123
Financial Online Assessment Systems	0	0	0	0	0
Northamptonshire Libraries Self Service Terminals	40,000	0	0	0	40,000
Community Library Prog - Roade	96,069	0	0	0	96,069
Community Library Prog - Brackley Library	5,000	0	0	0	5,000
Wootton Library	0	0	0	0	0
Doddridge Centre	967	0	0	0	967
Library Management System Replacement	173,952	0	0	0	173,952
Adults, Housing & Communities	11,688,340	8,057,481	6,950,000	6,950,000	33,645,821
Children					
Towcester South Primary School	627,143	0	0	0	627,143
Northampton School for Girls Extension	2,750,000	0	0	0	2,750,000
School Minor Works 2021-22	0	0	0	0	0
Schools Minor Works Programme 2019-20	0	0	0	0	0
Magdalen College School Expansion	271,136	0	0	0	271,136
Moulton School and Science College Expansion	67,016	0	0	0	67,016
Schools Minor Works 20-21	0	0	0	0	0
Schools Minor Works 22-23	689,526	0	0	0	689,526
Guilsborough School	32,313	0	0	0	32,313
Parker E-ACT Academy SEND expansion	0	0	0	0	0
Campion School Improvements	14,605	0	0	0	14,605
Northampton Secondary School Capacity	166,732	0	0	0	166,732
Schools Strategic Maintenance – PFI Blinds	0	0	0	0	0
Northampton Capacity - Duston School bulge	490,912	0	0	0	490,912
Malcolm Arnold S106 Works	26,151	0	0	0	26,151
Northampton Secondary Schools Capacity – Northampton School for Girls Bulge Capacity	320,715	0	0	0	320,715
Northampton Secondary School Capacity - Kingsthorpe College Bulge	58,880	0	0	0	58,880
Elizabeth Woodville School S106	0	0	0	0	0
Northampton Schools PFI Wave 2 Lifecycle Funding	365,644	373,688	381,909	0	1,121,241
Provision of Primary SEND places	647,102	0	0	0	647,102

Provision of Secondary SEND places	3,266,468	0	0	0	3,266,468
Provision of All Through SEND places	795,861	0	0	0	795,861
3G Sports Pitch at Wantage Farm	0	0	0	0	0
Wootton Park Free School Temporary Bulge Capacity	101,369	0	0	0	101,369
Sponne School	58,240	0	0	0	58,240
The Grange School	74,166	0	0	0	74,166
Barrack Road Educational Facilities	43,340	0	0	0	43,340
East Hunsbury Primary School - S106 improvement project	198,669	0	0	0	198,669
Harlestone Primary School - S106 improvement project	18,358	0	0	0	18,358
Kingsthorpe College - S106 improvement project	189,362	0	0	0	189,362
Tiffield SEND School	18,348,386	4,600,000	0	0	22,948,386
Northampton School for Boys Capacity Capital Funding	100,000	0	0	0	100,000
Kingsthorpe College Capacity Capital Funding	200,000	0	0	0	200,000
Walgrave Primary School - SEND Capital Funding	5,000	0	0	0	5,000
Temporary bulge capacity at Malcolm Arnold Academy	400,000	0	0	0	400,000
Overstone Leys	4,156,314	3,750,000	0	0	7,906,314
Total Children	34,483,408	8,723,688	381,909	0	43,589,005
Children's Trust					
Refurbishment of John Greenwood Shipman	1,172,000	0	0	0	1,172,000
New residential 4 bed home	1,142,792	0	0	0	1,142,792
Independent Fostering and Adoption IT system	300,000	0	0	0	300,000
Homes to support fostering	192,576	168,000	168,000	168,000	696,576
Homes 2 Inspire - Childrens Homes	202,191	0	0	0	202,191
New ways of working	0	0	0	0	0
Total Children's Trust	3,009,559	168,000	168,000	168,000	3,513,559
Corporate					
Social Care system replacement	896,077	0	0	0	896,077
IT Transition	102,560	0	0	0	102,560
IT Security Solutions	85,000	0	0	0	85,000
Office365 Implementation	77,018	0	0	0	77,018
Sharepoint 2007 Migration	79,000	0	0	0	79,000
Ncloud Server replacements	0	0	0	0	0
Election Equipment	0	0	0	0	0
Express Signature Verification Software	5,500	6,000	0	0	11,500
Low Code Platform	180,000	0	0	0	180,000
DTI Minor works	100,000	50,000	50,000	0	200,000
Future IT Infrastructure Discovery Work	160,000	0	0	0	160,000
PC Equipment Hardware Refresh	2,209,780	1,185,000	1,185,000	1,185,000	5,764,780
WNC Share of Shared Service Road Maps	469,000	4,000,000	0	0	4,469,000
Service Management Solution	128,570	0	0	0	128,570
Telephony & Contact Centre Replacement	793,552	0	0	0	793,552
Civica Digital 360 Licence Renewal	0	0	0	0	0
SIEM Solution & Cybersecurity tools	350,000	0	0	0	350,000
Identity and Access Management	150,000	0	0	0	150,000
Replacement of End of Life Local Area Network equipment	160,000	0	0	0	160,000
Total Corporate	5,946,057	5,241,000	1,235,000	1,185,000	13,607,057
Finance					
IFRS16 Lease Right of Use Assets	538,663	0	0	0	538,663
Revenues and Benefits Capital Investments	765,239	0	0	0	765,239
Asset Management System	100,000	0	0	0	100,000
Capital Salaries	220,000	225,000	230,000	235,000	910,000
Total Finance	1,623,902	225,000	230,000	235,000	2,313,902

Highways and Waste Capital					
Northampton North West Relief Road	23,051,040	1,000,000	2,343,000	0	26,394,040
DfT Highway Maintenance Needs Block 21/22	0	0	0	0	0
DfT Pothole Fund 21/22	0	0	0	0	0
DfT Highway Maintenance Needs Block 22/23	918,467	0	0	0	918,467
DfT Highway Maintenance Incentive Block 22/23	0	0	0	0	0
DfT Pothole Fund 22/23	906,724	0	0	0	906,724
LTP Integrated Transport Block 2022-23	1,588,869	0	0	0	1,588,869
DfT Highway Maintenance Needs Block 23/24	4,742,000	0	0	0	4,742,000
DfT Highway Maintenance Incentive Block 23/24	1,185,000	0	0	0	1,185,000
DfT Pothole Fund 23/24	4,742,000	0	0	0	4,742,000
LTP Integrated Transport Block 2023-24	1,550,000	0	0	0	1,550,000
DfT Highway Maintenance Needs Block 24/25	0	4,742,000	0	0	4,742,000
DfT Highway Maintenance Incentive Block 24/25	0	1,185,000	0	0	1,185,000
DfT Pothole Fund 24/25	0	4,742,000	0	0	4,742,000
LTP Integrated Transport Block 2024-25	0	1,550,000	0	0	1,550,000
Northampton Growth Management Scheme Phase 1	4,206,011	0	0	0	4,206,011
A45 Daventry Development Link Road	894,307	0	0	0	894,307
DfT Highway Maintenance Incentive Block 21/22	0	0	0	0	0
Active travel scheme tranche 2	1,062,671	0	0	0	1,062,671
Active Travel Enhancements	171,216	690,131	0	0	861,347
Rural Traffic Calming	200,000	200,000	200,000	200,000	800,000
National Productivity Investment Fund(NPIF) - Cliftonville	25,218	0	0	0	25,218
LTP Integrated Transport Block 2021-22	215,276	0	0	0	215,276
Vehicle Replacement Programme	502,130	600,000	1,045,000	0	2,147,130
HS2 Road Safety Fund	145,259	0	0	0	145,259
LTP Integrated Transport Block 2020-21	0	0	0	0	0
Challenge Fund Schemes 2020-21	0	0	0	0	0
DfT Highways 2020-21 Further Works	0	0	0	0	0
Capital support to routine maintenance 2020-21	0	0	0	0	0
S106 Former Timken, Main Rd Duston, Northampton	454,249	0	0	0	454,249
S106 - Silverstone Circuit Silverstone (file 264)	415,852	0	0	0	415,852
Environmental Services Contract [NBC]	1,215,075	262,154	190,787	678,876	2,346,892
Highway Maintenance - LTP 2020-21	0	0	0	0	0
s106 Buckton Fields Northampton	311,206	0	0	0	311,206
A43 Moulton Phase 2	455,875	0	0	0	455,875
Pothole Machinery	0	0	0	0	0
s106 Wood Burcote Court Towcester	255,118	0	0	0	255,118
S106 Monksmoor Daventry	242,521	0	0	0	242,521
UU Sailsbury Landscape Boughton Road Moulton	205,800	0	0	0	205,800
Household Waste Recycling Centres Sinking Fund	36,087	36,087	0	0	72,174
HCA Upton Remedial Works	621,179	100,000	0	0	721,179
Street Lighting Upgrade (ex- NCC assets)	2,713,723	3,025,090	754,161	0	6,492,974
S106 Flore Traffic Calming	66,610	0	0	0	66,610
S106 - Wootton Fields Ph3 (file 449)	133,803	0	0	0	133,803
S106 Radstone Fields, Brackley	132,282	0	0	0	132,282
S106 Harlestone Rd Northampton	130,794	0	0	0	130,794
S106 Overstone Leys	120,420	0	0	0	120,420
S106 West Station Rd Long Buck	115,584	0	0	0	115,584
S106 land at Brackmills (Bedford Rd Roxhill) Npt	101,535	0	0	0	101,535
Smart Commuters	91,471	0	0	0	91,471
Installation of Bin Holders in Laybys	74,000	0	0	0	74,000
S106 Buckton Fields West	73,340	0	0	0	73,340

S106 Apex Park	72,570	0	0	0	72,570
S106 - Bective Sch Whiston Rd, Kingsthorpe Npt (file 431)	67,253	0	0	0	67,253
S106 Cary Close Moulton (DWH)	55,473	0	0	0	55,473
s106 Ashton Road (pianoforte) Roade	61,978	0	0	0	61,978
A43 Northampton to Kettering Phase 1b	410,000	0	0	0	410,000
s106 Booth Rise North Npt	40,712	0	0	0	40,712
Wheelie Bins	40,000	40,000	0	0	80,000
Capitalisation of Bin Replacements	47,520	47,520	47,520	47,520	190,080
S106 Camp Hill Bugbrooke	39,589	0	0	0	39,589
s106 Overstone Leys (SUE) Overstone	0	0	0	0	0
S106 Overthorpe Rd M40 Banbury	32,575	0	0	0	32,575
S106 Foxhills Brackley	31,207	0	0	0	31,207
S106 Towcester Vale SUE	30,648	0	0	0	30,648
S106 Emmanuel Church Sc. Site, Billing Brook Road	29,717	0	0	0	29,717
S106 Chaplins Yd Stratford Road Road	29,069	0	0	0	29,069
s106 Wootton Fields Northampton (335)	26,272	0	0	0	26,272
S106 - Peace Hill Bugbrooke (file 343)	26,095	0	0	0	26,095
S106 Summerhouse Rd Moulton Park	24,500	0	0	0	24,500
S106 Old Greens Norton Rd Tow	23,919	0	0	0	23,919
s106 Nth of Ford - Royal Oak Way South, Daventry	20,097	0	0	0	20,097
S106 Npt Lane Moulton	15,000	0	0	0	15,000
S106 Site 7 Edgar Mobbs Npt	14,910	0	0	0	14,910
S106 Watford Lodge Watford	14,700	0	0	0	14,700
DCOb DIRFT 3, Hilmorton	10,456	0	0	0	10,456
S106 Towcester Rd Old Stratford	10,359	0	0	0	10,359
S106 Banbury Lane KingsSutton	5,871	0	0	0	5,871
S106 Former Allotments N-P Rd	5,916	0	0	0	5,916
S106 Dockham Way Crick	5,650	0	0	0	5,650
s106 Byfield Road, Woodford Halse (306)	5,297	0	0	0	5,297
S106 Danes Camp Way Northampton	4,976	0	0	0	4,976
Domestic Recycling Waste Bins	0	0	0	0	0
S106 65 Byfield Rd Woodford Ha	2,571	0	0	0	2,571
S106 GlebeFm Yelvertoft WindFm	1,979	0	0	0	1,979
S106 Grose QueensPark Kingsth	1,542	0	0	0	1,542
Northampton Gateway	200,000	0	0	0	200,000
Total Highways and Waste Capital	55,481,136	18,219,982	4,580,468	926,396	79,207,982
Economic Growth & Regeneration					
Northampton Market Square	11,372,255	0	0	0	11,372,255
Northamptonshire Superfast Broadband	3,963,285	0	0	0	3,963,285
Vulcan works	201,464	0	0	0	201,464
Abington Street Redevelopments	5,595,486	1,047,000	0	0	6,642,486
Watermeadows	10,000	0	0	0	10,000
Northampton Bike Park	91,517	0	0	0	91,517
Central Museum Development	0	0	0	0	0
Old Black Lion	340,683	0	0	0	340,683
Extension of 78 Derngate	40,000	0	0	0	40,000
24 Guildhall Road Block	2,867,626	100,000	0	0	2,967,626
Towcester Toilets	0	0	0	0	0
Upton Country Park	0	0	0	0	0
Capital Improvements - Regeneration Areas	50,000	0	0	0	50,000
Heritage Gateway	12,751	0	0	0	12,751
Middleton Cheney Church Yards	0	0	0	0	0
Sponne Arcade	378,239	0	0	0	378,239
Market Walk	3,103,365	903,364	0	0	4,006,729
Four Waterside	1,500,000	7,000,000	0	0	8,500,000
Marefare Heritage Gateway	1,870,750	0	0	0	1,870,750
Northampton Town Centre Public Realm	4,179,486	0	0	0	4,179,486
Total Economic Growth & Regeneration	35,576,906	9,050,364	0	0	44,627,270

Assets and Environment Capital					
Northamptonshire Holistic Flood Resilience	1,526,856	3,865,000	0	0	5,391,856
Town Centre Vision - Cinema Site 1	284,307	0	0	0	284,307
Homelessness Temporary Accommodation	843,855	0	0	0	843,855
Northampton Leisure Trust	1,517,315	0	0	0	1,517,315
Daventry to Braunston Cycle Track	170,341	0	0	0	170,341
Property Minor Works 2020-21	13,808	0	0	0	13,808
Parks / Allotments / Cemeteries Enhancements	250,000	260,000	260,000	260,000	1,030,000
Leisure Centre East	0	0	0	0	0
Operational Buildings - Enhancements	656,070	0	0	0	656,070
4-14 High March Refurbishment	1,682,780	0	0	0	1,682,780
Property Minor Works 2019-20	864	0	0	0	864
Guildhall Boilers	281,996	0	0	0	281,996
St Michaels MSCp lift refurbishment	253,830	0	0	0	253,830
Mulberry Place Restaurant capital contribution	0	0	0	0	0
Middlemore Infrastructure Completion Works	81,259	0	0	0	81,259
Long Buckby Flood Management	104,038	0	0	0	104,038
Racecourse Enhancement	19,878	0	0	0	19,878
Community Youth Provision	104,160	0	0	0	104,160
Country Park Improvements (\$106 funded)	0	0	0	0	0
Public toilets refurbishment	20,651	0	0	0	20,651
Parks, Allotments and Cemeteries funded by external contributions	11,784	0	0	0	11,784
Car Park Extension St John's Square and Chapel Lane	10,000	0	0	0	10,000
New Rehabilitation Building	39,919	0	0	0	39,919
Refurbishment of Paved Areas	86,000	0	0	0	86,000
Heartlands commercial new build	6,503	0	0	0	6,503
Monksmoor Primary School	34,137	0	0	0	34,137
Rainsbrook Crematorium enhancements	71,500	0	0	0	71,500
Middlemore Cycle/Rural Tracks	67,946	0	0	0	67,946
Affordable Housing Gouldens View	0	0	0	0	0
Lodge Farm Community Centre	23,899	0	0	0	23,899
Commercial Landlord Responsibilities	51,430	0	0	0	51,430
Heartlands completion works	46,198	0	0	0	46,198
New Commercial Unit Plot 2B Heartlands Daventry	4,420,000	0	0	0	4,420,000
Refurbishment of paths and structures for open spaces	40,475	0	0	0	40,475
Capital Works to 68 and 68a High St	20,665	0	0	0	20,665
Electric Charge Points	0	0	0	0	0
Middlemore minor works	0	0	0	0	0
Northampton Parks and Open Spaces (additional)	0	0	0	0	0
Elgar Centre M&E	15,000	0	0	0	15,000
DCP refurbishment programme	1,930	0	0	0	1,930
Middlemore Landscape Completion Works	31,000	0	0	0	31,000
Guildhall Roof	18,086	0	0	0	18,086
Country Park - Capital Costs	12,594	10,000	0	0	22,594
Lodge Road Fire Risk Assessment	0	0	0	0	0
Public Offices - Improvements, Plant & Equip.	0	0	0	0	0
Westbridge Depot - Accommodation for NPH	1,162,367	0	0	0	1,162,367
Property Minor Works 2022-23	179,966	0	0	0	179,966
Northampton Leisure Centres Fire Assessment Works	348,705	0	0	0	348,705
County Hall Refurbishment/Improvements	944,898	0	0	0	944,898
Central Library Refurbishment	406,299	0	0	0	406,299
LED Replacement Lighting Scheme	261,340	139,568	279,136	0	680,044
Death Management Services	5,683,816	6,700,000	1,000,000	0	13,383,816
Dallington Cemetery Extension	557,993	100,000	0	0	657,993

Replacement of Boiler Management System at One Angel Square	0	0	0	0	0
Floor and wall finishes replacement/ renewal	1,263,278	579,750	3,478,500	0	5,321,528
Boiler Replacements	225,000	225,000	1,125,000	0	1,575,000
Bridge Replacement Works	170,024	40,000	0	0	210,024
Magistrates Court and Hazelrigg House Roof Repairs	44,190	0	0	0	44,190
Southfields Community Centre Refurbishment	90,000	0	0	0	90,000
Abington Museum Boilers	261,303	0	0	0	261,303
Restoration of Historic Monuments & Statues	102,128	15,000	15,000	0	132,128
Play Equipment at Children's Centres	60,000	0	0	0	60,000
Outdoor Exercise Equipment	0	0	0	0	0
Purchase of Leasehold Properties in Brackley	2,132,000	0	0	0	2,132,000
Country Parks ANPR Equipment	100,000	0	0	0	100,000
The Abbey Centre	1,170,045	0	0	0	1,170,045
Daventry Leisure Centre	996,800	0	0	0	996,800
EPC Improvements to Leased Buildings	370,000	220,000	220,000	0	810,000
Rural Leisure Centres Heat Decarbonisation Scheme	8,039,000	0	0	0	8,039,000
Property Minor Works 2023-24 onwards	500,000	500,000	500,000	500,000	2,000,000
Air Quality	30,280	0	0	0	30,280
Active Traffic Management and Air Quality	130,000	0	0	0	130,000
Total Assets and Environment Capital	38,050,504	12,654,318	6,877,636	760,000	58,342,458
Total	185,859,812	62,339,833	20,423,013	10,224,396	278,847,054

APPENDIX B - Outturn	Original LA	2022/23 Outturn	2023/24	2024/25	2025/26	2026/27	Total
		£,000	£,000	£,000	£,000	£,000	£,000
Housing Revenue Account (HRA)							
NPH Pell Court, Lumbertubs	NBC	(65)	20	0	0		(44)
NPH0002 Briar Hill (19-26 Southwood Hill) G	NBC	(8)					(8)
NPH0007 Cambourne Close (11-20) Delapre	NBC	(6)					(6)
NPH0011 Berkeley House & St. Marys House (Roof Gdns)	NBC	535	6,460	3,575	0		10,570
NPH0014 St Davids & Hinton, Kingsthorpe	NBC	6	0	0	0		6
NPH0016 Pendle Road, Duston	NBC	(16)	0	0	0		(16)
NPH0017 Swale Drive, Kings Heath	NBC	52	0	0	0		52
NPH0018 Orchard Close, Wootton	NBC	43	0	0	0		43
NPH0019 Norman Road, Abington	NBC	(15)	0	0	0		(15)
NPH0021 Longueville Court, Lumbertubs	NBC	0	0	0	0		0
NPH0023 Harold Street, Town Centre	NBC	(1)	0	0	0		(1)
NPH0024 Blakesley Close, Kingsthorpe	NBC	(32)	0	0	0		(32)
NPH0025 Margaret Street, Town Centre	NBC	0	0	0	0		0
NPH0026 Baukewell, Preston & Nethermead, Lumbertubs	NBC	8	0	0	0		8
NPH0028 Connaught Street, Town Centre	NBC	19	0	0	0		19
NPH0030 Fullerburn Court, Lumbertubs	NBC	(9)	0	0	0		(9)
NPH0033 Tyes Court 2 (G7-17), Lings	NBC	142	(20)	0	0		122
NPH0034 Keswick Drive, Lakeview	NBC	(19)		0	0		(19)
NPH0038 Limehurst Close & Newton Road, Duston	NBC	(11)	0	0	0		(11)
NPH0039 Gloucester Avenue (1) (G8-41), Delapre	NBC	(11)	0	0	0		(11)
NPH0044 Gloucester Avenue (2) (G1-7), Delapre	NBC	70	6	0	0		76
NPH0045 Prentice 3 & Overleys, Goldings	NBC	(18)	0	0	0		(18)
NPH0046 Shadowfax, Prentice 2 & Marshleys, Goldings	NBC	(1)	0	0	0		(1)
NPH0047 Medway Drive, Kings Heath	NBC	(9)	0	0	0		(9)
NPH0048 Tyes Court 1 (18-21G), Lings	NBC	(3)		0	0		(3)
NPH0050 East Paddock Ct (Hayeswood), Lings	NBC	(1)	0	0	0		(1)
NPH0051 Derwent Drive, Kings Heath	NBC	(21)	1,657	30	0		1,666
NPH0052 Fraser Road, Thorplands	NBC	0	0	2,044	19,627		21,672
NPH0053 Riverside House	NBC	4,159	0	0	0		4,159
NPH0054 Beaumont House	NBC	94	0	0	0		94
NPH0055 Belgrave House / Clock House, Town Centre	NBC	111	1,800	6,000	4,047		11,958
NPH0056 Blackthorn Group 1 (Phase 1)	NBC	(115)		0	0		(115)
NPH0057 Toms Close, Collingtree	NBC	1	0	0	0		1
NPH0058 Churchill & Windermere Way, Lakeview	NBC	3	0	0	0		3
NPH0059 Oak Tree Rise (Billing Brook Road)	NBC	(52)	0	0	0		(52)
NPH0060 Moray Lodge	NBC	(436)	0	0	0		(436)
NPH0062 Glebeland Road, Dallington	NBC	72	711	14	0		798
NPH0063 Stenson Road, St James	NBC	382	(13)	0	0		368
NPH0064 Tanners Pub Site	NBC	115		0	0		115
NPH0067 Prentice Court (5), Goldings	NBC	682	0	0	0		682
NPH0068 Ringway (3), Briar Hill	NBC	38	1,369	379	0		1,785
NPH0069 Northfield Road (2), Duston	NBC	0	301	0	0		301
NPH0071 The Bungalows, Lings	NBC	(35)	0	0	0		(35)
NPH0073 Woodstock Roof Extension	NBC	43	0	0	0		43
NPH0074 Dover Court Roof Extension	NBC	804	0	0	0		804
NPH0076 New Southbridge Road	NBC	164	4,982	383	2		5,532
NPH0077 Paddock Mill Court, Blackthorn (G89-94)	NBC	1	0	0	0		1
NPH0078 Hopmeadow Court, Blackthorn	NBC	136	8	0	0		143
NPH0079 Maidencastle (4) Garages 19-22, Blackthorn	NBC	46	8	0	0		53
NPH0080 Pikemead Court, Blackthorn	NBC	(32)	0	0	0		(32)
NPH0082 Avenue Campus	NBC	4,188	8,021	13,393	4,990		30,592
NPH0083 Montague Crescent, Duston	NBC	60	1,680	6	0		1,747
NPH0084 Bouverie Road, Hardingstone	NBC	0	20	1,226	0		1,246
NPH0085 Colwyn Road, Town Centre	NBC	0	20	629	0		649
NPH0091 East Oval, Kings Heath	NBC	50	689	12			751
NPH0092 Upper Thrift Street, Town Centre	NBC	43	514	9	0		566
NPH0093 Wessex Way, Abington	NBC	15	202	0	0		217
NPH0094 Ambush Street, St James	NBC	0	205	0	0		205
NPH0095 Stanley Road, St James	NBC	25	645	0	0		670
NPH0096 Althorpe Road East & West, St James	NBC	1	20	541	0		562
NPH0097 Ecton Brook Care Home	NBC	34	580	2,613	0		3,227
NPH0098 Harefield Road, Blackthorn	NBC	3	96	1,189	152		1,440
NPH0108 Riverside - Ground Floor	NBC		1,284	73			1,357
NPH0109 Ex-Servicemen's Club -Sheep Street	NBC	23					23
New Build Pool	NBC	0	0	0	38,998	38,989	77,987
Buybacks and Spot Purchases	NBC	0	5,230	2,500	2,500	503	10,733
Rough Sleeper Accommodation Programme (RSAP)	WNC	1,678					1,678
External Improvements	NBC	15,016	15,210	7,496	6,850	10,008	54,580
Internal Works	NBC	4,142	1,840	1,840	1,840	1,840	11,500
Structural Works and Compliance	NBC	1,325	470	471	471	471	3,207
Disabled Adaptations	NBC	1,490	1,287	1,287	1,287	1,287	6,640
Environmental Improvements	NBC	997	3,038	3,038	3,038	3,038	13,150
IT Development	NBC	389	500	430	395	340	2,054
Total HRA		36,292	58,839	49,180	84,197	56,476	284,984

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11 July 2023

**Portfolio Holder for Education and Children's Services:
Councillor Fiona Baker**

Report Title	Special Educational Needs and Alternative Provision Strategy 2023 – 2026
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Report Author	Ben Pearson, Assistant Director for Education
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List of Approvers

Monitoring Officer	Catherine Whitehead	14/06/2023
Chief Finance Officer (S.151)	Martin Henry	14/06/2023
Other Director	Stuart Lackenby	14/06/2023
Communications Lead/Head of Communications	Becky Hutson	14/06/2023

List of Appendices

Appendix A – Draft SEND and Alternative Provision Strategy

1. Purpose of Report

- 1.1. This report introduces the West Northants Special Educational Needs and/or Disabilities and Alternative Provision Strategy. This strategy provides the framework for how the Council and the local partnership will deliver its statutory duties for in relation to education, health and care for children with Special Educational Needs and/or Disabilities.
- 1.2. This strategy includes the requirements of the joint OFSTED/CQC Local Area SEND Inspection framework and the SEND and Alternative Provision Improvement Plan, published by the Department for Education in March 2023.

- 1.3. The strategy also includes the WNC Co-production Charter – this is a commitment for how the local partners will work together in line with our statutory requirements within the Children and Families Act 2014.

2. Executive Summary

- 2.1 This report introduces the new West Northants SEND and Alternative Provision Strategy which has been co-produced by West Northamptonshire Council and all strategic partners. This strategy sets out our ambitious vision, aims and priorities to ensure that we effectively identify and meet the needs of the children and young people with Special Educational Needs and/or Disabilities (SEND), 0 to 25.
- 2.2 The proposed strategy includes details of how the Council and its partners will fulfil their statutory requirements and meet the needs of children with SEND in West Northants. At the core of the new strategy is a Co-production Charter; this is a commitment for all partners to make that demonstrates how we work in partnership to improve outcomes for children and young people with SEND.
- 2.3 This report includes information about how the strategy has been co-produced with all partners, including children, young people and their families, and how the new strategy will be implemented and monitored.

3. Recommendations

It is recommended that members of the Cabinet adopt the co-produced Special Educational Needs and Disabilities and Alternative Provision Strategy 2023-26. This Strategy includes the new WNC Co-production Charter.

4. Reason for Recommendations (NOTE: this section is mandatory and must be completed)

- To accord with OFSTED and CQC requirements as specified in the Local Area SEND Inspection framework and the Department for Education Special Educational Needs and Disabilities and Alternative Provision Improvement Plan.
- To support the Council and its partners to improve outcomes for children with SEND
- To ensure an effective and consistent offer of support to children with SEND and their families across West Northants

5. Report Background

OFSTED/Care Quality Commission Inspection framework

- 5.1 The new OFSTED/Care Quality Commission Area SEND Inspection framework (in force since January 2023) sets out the evaluation criteria that inspectors use to make judgements, and

examples of the kinds of evidence they gather and activities they carry out to evaluate the local area's arrangements for children and young people with SEND.

- 5.2 Inspections evaluate how well members of a local area partnership work together to improve the experiences and outcomes of children and young people with SEND. 'Local area partnership' refers to those in education, health and care who are responsible for the strategic planning, commissioning, management, delivery and evaluation of arrangements for children and young people with SEND who live in a local area.
- 5.3 A local area is the geographic footprint of a local authority - West Northants Local Area will be inspected as a local area – there will be a separate inspection of North Northants despite there being joint services (health/social care). The Council has the lead responsibility for the local area partnership.
- 5.4 When evaluating the local area partnership, inspectors focus mainly on how effectively the local authority (including Northamptonshire Children's Trust (NCT)) and Integrated Care Board (ICB) jointly plan, evaluate and develop services for children and young people with SEND. However, they also consider the duties of other area partners, which are set out in the Children and Families Act 2014 and described further in the SEND code of practice.

Department for Education Special Educational Needs and Disabilities (SEND) and Alternative Provision (AP) Improvement Plan

- 5.5 In March 2023 the Department for Education published the Special Educational Needs and Disabilities (SEND) and Alternative Provision (AP) Improvement Plan. This document sets out the government's proposals to improve outcomes for children and young people; improve experiences for families, reducing the current adversity and frustration they face; and deliver financial sustainability.
- 5.6 Local area partnerships are expected to produce a response to the SEND and Alternative Provision Delivery Plan. In West Northants this is captured within the proposed SEND and Alternative Provision Strategy.

6. Issues and Choices

- 6.1 The Council and our local partners do not have a joint understanding of needs of children with SEND locally, and do not have a joint approach to delivering services. A joint approach to delivering SEND services, including clarity about how our statutory obligations will be delivered is needed.
- 6.2 The Council proposed to the SEND Improvement Board (local multi-agency governance group) that a new SEND & Alternative Provision Strategy should be co-produced. This proposal stated that in order to address areas of under-performance, and to achieve the best outcomes for children with SEND and their families, the new approach must include all partners, especially children and their families.

Developing the new West Northants SEND and AP Strategy

- 6.3 The Council recognised the need for a new approach to improve outcomes for children and young people with SEND. This began in summer 2022 with the recruitment of additional leaders within Children’s Services with a background and expertise in leading local SEND systems.
- 6.4 In November 2022, the Council secured additional funding to recruit a new SEND Improvement Team to lead the development of the new SEND and Alternative Provision Strategy. This team started in early 2023 and have led the co-production of the new SEND and Alternative Provision Strategy
- 6.5 The SEND Improvement Team, working in co-production with education, local health, social care leaders and Northampton Parents Forum Group (the local parent representative organisation) organised 20 different events to develop the new strategy.
- 6.6 These events involved over 800 children and young people with SEND, parents, carers, educational, health and social care professionals to identify the key priorities for the strategy. The feedback from these events has led to the draft Co-production Charter and SEND and Alternative Provision Strategy. These events have included: children/young people events, face to face events across Northamptonshire and online events and focus groups.
- 6.7 The Council received over 3,000 pieces of feedback through the co-production events. These have been collated to form the framework for the proposed strategy as set out below

Our Co-production Charter - Our co-production charter has five values:

- Communication
- Respect
- Transparency
- Working together
- Accountability

The Co-production Charter can be found in full on page 10 of Appendix A.

There are 3 Golden thread that run through the whole strategy and there are 6 key priority areas. These are detailed from pages 12 to 13 in Appendix A.

Golden Threads

1. Co-production
2. Inclusion
3. THRIVE

Priority Areas

1. **Accessibility** – Clear communication, reviewing and refining processes, developing the Local Offer, improving accessibility of transport and ensuring admissions is based on need.
2. **Resources** – Ensure sufficiency of jointly commissioned high-quality appropriate provision, use the expertise across all partners to develop best practice, use clear evidenced base to develop outcomes that build and monitor the effectiveness of our actions and use funding efficiently in a needs-led way
3. **Identification and Assessment** - Provide support and training in line with the SEND Ranges to ensure a consistency of approach, continuously improve the timeliness of assessment and reviews, provide support so that children and young people can effectively transition between settings and services.
4. **Training** – Provide training so that children and young people receive the right support, in the right place and at the right time within their inclusive communities; develop a shared understanding of SEND across all partners so they can identify needs early and understand appropriate strategies that can be used to support
5. **Alternative Provision** – Co-produce and implement an Alternative Provision Strategy, use trauma-informed practice, reduce the number of suspensions and permanent exclusions and identified and effectively meet pupils’ needs through the Alternative Provision offer.
6. **Preparation for Adulthood** - Provide training so all partners effectively support young people with their Preparation for Adulthood from the earliest stages, ensure pathways into adulthood are clear and young people can access clear information about support and services available, develop and deliver supported internships and ensure apprenticeships are accessible for young people with Special Educational Needs and Disabilities or who are experiencing Alternative Provision.

6.8 To achieve our ambitions, we will publish transparent, detailed, and specific delivery plans that sit beneath this strategy. These are being co-produced through the SEND Improvement Board, which provides multi agency governance, including senior leaders from education, health, social care, parent/carers and the DfE.

6.9 The SEND Improvement Board will lead an annual review so that we can assure that it is effective and has the desired impact.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The proposed SEND and Alternative Provision Strategy includes a priority of ‘Resources’. This details how the Council and its partners will best use the people, property and funding available to best meet children’s needs. This includes commitments around revenue and capital funding available to the Council, including the school capital programme which is being used to create over 500 new specialist education places.

7.1.2 The strategy also includes a commitment to improving the consistency of how needs-led funding is allocated. This is being managed through ongoing projects with all partners and will be reported through the SEND Improvement Board and West Northants Schools' Forum.

7.1.3 The proposed strategy also prioritises the use of best practice within all schools and early years providers to improve how children's needs are identified earlier, and where possible met within mainstream settings. This is a critical approach needed to manage the current Dedicated Schools Block funding available to the Council.

7.1.4 The strategy does not include specific saving targets. However, the strategy will support the Council to manage available budgets more effectively. This includes reducing legal and officer costs by investing in new staff, systems and processes.

7.2 **Legal**

7.2.1 The proposed SEND and Alternative Provision Strategy demonstrates how the local area partnership will deliver their statutory duties captured within the Children and Families Act 2014 and SEND Code of Practice.

7.3 **Risk**

7.3.1 At present, the Council is not delivering many statutory duties in relation to children with additional needs. This includes providing Educational Psychology and Education, Health and Care Plans (EHCPs) within set timescales. Without a coordinated approach, the Council and partners will not be able to prioritise these areas of work and improve timeliness and quality.

7.3.2 The new strategy will help the Council address historic under-performance in a consistent way, and by clearly allocating resources to meet identified needs. The new strategy will also include a detailed performance framework that will measure the impact of our work on children and the families.

7.4 **Consultation and Communications**

7.4.1 The draft strategy has been co-produced between the council and key stakeholders including children with SEND, their parents and carers, health and social care colleagues, teaching and non-teaching staff, governing bodies of schools, academies and nurseries, further education colleges and University colleagues at 20 events attended by 800 people and resulting in around 3,000 pieces of feedback.

7.4.2 The Council will continue to actively engage and involve all partners, keeping them updated on the process and seeking any further comments they may have. Once adopted, further communication activities will keep the public informed and updated on the progress being made towards achieving the outcomes of the strategy.

7.4.3 Any decision derived from this strategy that impacts on the Council's delivery of its statutory duties to children and their families will be subject to appropriate engagement and/or consultation.

7.5 **Consideration by Overview and Scrutiny**

- 7.5.1 The development of the SEND and AP Strategy has been discussed at a number of OS Committee meetings as set out below. There is a SEND Task and Finish Group that has been created to have an overview of the implementation of the new SEND and AP Strategy.
- 7.5.2 People OS Committee on 21 November 2022 – the agenda papers and minutes are at: [Agenda for People Overview and Scrutiny Committee on Monday 21st November 2022, 6.00 pm - West Northamptonshire Council \(moderngov.co.uk\)](#)
- 7.5.3 There was also some discussion of SEND at the People OS Committee on 21 February 2023 ([Agenda for People Overview and Scrutiny Committee on Tuesday 21st February 2023, 6.00 pm - West Northamptonshire Council \(moderngov.co.uk\)](#))

7.6 **Climate Impact**

- 7.6.1 The new SEND & AP Strategy will lead to a reduction of children needing to attend specialist provision that is based out of county. This should lead to a reduction in transport costs, and the delivery of home to school transport.

7.7 **Community Impact**

- 7.7.1 This strategy will deliver significant community impact for children, young people with SEND and Alternative Provision and their families, through the provision of co-produced, effective jointly commissioned services which reduce the current adversity and frustration they face.

8. **Background Papers**

- 8.1 None

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WEST NORTHAMPTONSHIRE



SPECIAL
EDUCATIONAL
NEEDS AND/OR
DISABILITIES
and
ALTERNATIVE PROVISION
STRATEGY

2023 – 2026



West
Northamptonshire
Council



Northamptonshire
Children's Trust

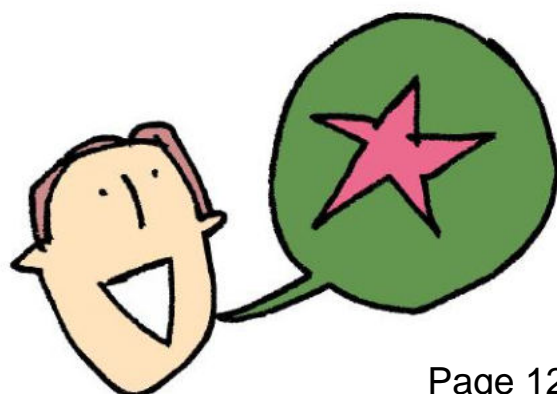
Integrated Care
Northamptonshire



Page 125
NPPFG
Northampton Parent Forum Group

CONTENTS

Foreword	4
Introduction	5
Our Aims	6 - 8
Our Co-Production Charter	9 - 10
Our Co-produced Strategy	11
Golden Threads	12 - 13
Our Six Priorities	14
Thrive Tree	15
The Priorities	16-18



FOREWORD

I am incredibly proud that we have taken the opportunity to work together to reimagine how Special Educational Needs and/or Disabilities (SEND) and Alternative Provision (AP) in West Northamptonshire will be, as this is a subject that is truly close to my heart.

Children are our future, and they deserve the very best that we can give them. We know that we have to get it right so that all children can flourish, thrive and live their best lives. We are committed to working with all our partners to improve outcomes; children, young people and their families, those across education, health, social care, the voluntary sector and our local employers.

We are all here because we care. We are all here because we are determined to make positive change happen. We are all here to make a difference to the lives of children and young people with SEND, those that are accessing Alternative Provision and their families.

We will all work with transparency, honesty, and openness and we will hold each other to account. We will all deliver the changes that need to be made to improve the lived experiences of our children, young people and their families.

I am pleased that this strategy has been created using the voices of children and young people themselves along with the rich feedback received from families and our other partners, gathered at co-production events. We are committed to developing and evolving detailed plans for each of the six priorities identified through co-production. This will be done together and will focus on the positive impact we have on children and young people's lives.

I want to personally thank everyone who has been part of developing this strategy and for your ongoing commitment to support our journey of improvement.

I look forward to meeting all our partners and businesses who will sign up to our Co-Production Charter and be part of delivering this strategy.

Fiona Baker

Cllr Fiona Baker,
Cabinet Member for Children, Families, Education and Skills



INTRODUCTION

West Northamptonshire Council, children, young people, families and our partners across Education, Health and Social Care, have co-produced a new SEND and Alternative Provision Strategy, and a new Co-Production Charter for 2023 – 2026. This strategy sets out our ambitious vision, aims and priorities to ensure that we effectively identify and meet the needs of the children and young people with Special Educational Needs and/or Disabilities (SEND) age 0 to 25.

This strategy sets out what we will do to achieve this vision.

OUR VISION IS FOR ALL CHILDREN, INCLUDING THOSE WITH SEND TO THRIVE, FULFIL THEIR POTENTIAL, AND LIVE THEIR BEST LIFE.



That all children and young people are healthy, safe and part of inclusive communities.



That all children and young people, including those with SEND or in Alternative Provision thrive and achieve aspirational outcomes.

OUR VISION



That all children and young people have a good start in life, are curious, inspired to succeed and achieve their dreams and ambitions.



That all young people enjoy realistic adulthood outcomes as valued citizens.

OUR AIMS

‘IMPROVING THE LIVED EXPERIENCE’

We know that we need to improve and to do this we have to rethink the way we work. We have been listening to children, young people, families and our partners across Education, Health, and Social Care through co-production events, to find out exactly what needs to change.

We know that the lived experiences and outcomes of many children with SEND and their families in West Northamptonshire has simply not been good enough.

We are genuinely committed to working in equal partnership and together we will improve and provide high-quality services to achieve ambitious positive outcomes that improve the lived experiences for all children and young people in West Northamptonshire.

‘BUILDING TRUST AND CONFIDENCE TOGETHER’

We will use the best available evidence to inform all aspects of our work. We know that we still have a lot to do to ensure that children, young people, families, and our partners have trust and confidence that we can, and will, improve to embed positive change.



OUR AIMS

‘WE ARE COMMITTED TO MAKING POSITIVE CHANGE HAPPEN’

We are committed to making positive change happen. We know there is history where children and families have felt let down and feel that promises have not been fulfilled. We are determined to change this. We also know that this will take time, but we will work diligently, co-produce quickly and effectively to make positive change happen.



We know we need to address the following concerns:

- There is not a shared understanding of inclusion across all partners, and we need to co-produce an inclusion charter.
- Services are stretched.
- Some parents feel powerless and feel they do not have a voice.
- Families need better holistic, emotional support.
- Processes and systems are not clear enough.
- There has not been enough strategic joined up thinking from all partners to support schools to effectively meet a child's needs.
- We do not effectively use the current expertise of colleagues within education to support and network with each other.
- Educational Psychology advice, Occupational Therapy and Speech and Language Therapy are often not delivered in line with statutory requirements.
- Early support is not effective for all pupils and this results in suspensions, and permanent exclusions.
- There is a lack of options to meet the range of needs that children have.
- Partners do not have consistent knowledge of children who do not access education at all or who access on a part time basis. We need to work together better, to address the underlying reasons behind this and build inclusive communities that can support their reintegration holistically.

OUR AIMS

'CO-PRODUCTION IS AT THE HEART OF EVERYTHING WE DO'

As part of the initial co-production stages for the new SEND Strategy and Co-Production Charter, West Northamptonshire and partners have run a series of co-production events with children, young people with SEND or who are access Alternative Provision, parents, carers, Educational, Health and Social Care professionals to identify the key priorities for the strategy. We have run 20 engagement events with over 800 people, all of whom provided invaluable input to help co-produce our Charter and our Special Educational Needs and Alternative Provision Strategy. These events have included: children/young people events, face to face events across West Northamptonshire and online events and focus groups.



OUR CO-PRODUCTION CHARTER

At our co-production events, we collectively built a shared understanding of what co-production is. We used digital software to build live feedback, identifying the key values for co-production working. These have been used to create a Co-Production Charter, which outlines the principles for putting the approach into action. The Co-Production Charter outlines the shared values for everyone who works with or cares for children and young people, with SEND or those who are experiencing Alternative Provision, have agreed to adopt.

Whilst co-production is a statutory requirement for all agencies, this is not why we are doing it. We genuinely believe that co-production is one of the key golden threads that builds inclusive communities which wrap around our children, young people and their families and supports them to thrive.

Our Co-Production Charter has five agreed values:

• WORKING TOGETHER

• COMMUNICATION

• TRANSPARENCY

• RESPECT

• ACCOUNTABILITY



West Northants Co-production Charter

'Together we are stronger'

This Co-Production Charter outlines the shared values that all partners have agreed to adhere to when working with children, young people and their families.



What is Co-production?

Co-production means working with people who use services as equal partners, to make a decision or shape a service that works for them.

Why co-produce and how do we know it makes a difference?

- ✓ Everyone feels equally valued and listened to.
- ✓ It leads to better services that improve people's lives.
- ✓ It is a legal requirement for all agencies to co-produce with children, young people and families.

This co-production charter outlines the 5 values that all parties will use to work together.

Communication

We will make our communication clear, consistent informative and timely.



Transparency

We will be open and honest as we make decisions.

Accountability

We will take responsibility, find solutions and regularly review to ensure we make a real difference.

Respect

We will listen to and empower people and treat them as equal partners.

Working together

We will work together and recognise that everyone has valuable contributions to make.



OUR CO-PRODUCED STRATEGY

Our strategy has been co-produced through a series of events and discussions with children, young people and their families, and all our partners across Education, Health, and Social Care. This includes elected members, early years providers, mainstream and special schools, alternative providers, further education colleges and the University of Northampton. It also includes our strategic partners and frontline health colleagues, Northampton Children's Trust, adult social care colleagues, local voluntary/community organisations and employers. More than 50% of comments have come from children, young people and their parents, and supported by Northampton Parent Forum Group and other parent groups.

The strategy reflects the shared priorities and aspirations that come from these events and demonstrates our commitment to co-production.



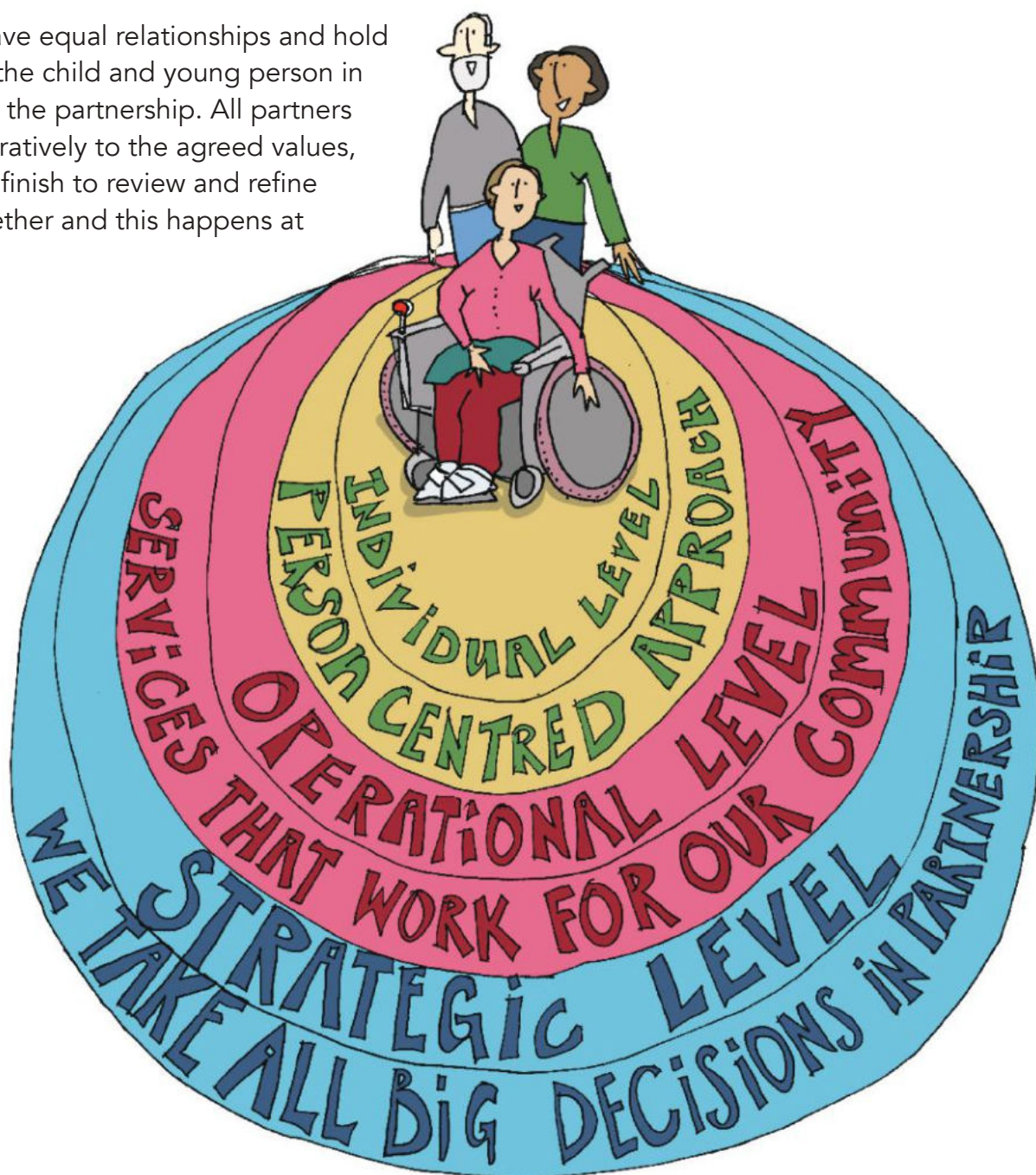
We are placing children, young people, and their families at the heart of our thinking. Our co-production work has identified golden threads and key priority areas which are at the heart of this strategy.

GOLDEN THREADS

GOLDEN THREAD ONE: CO-PRODUCTION

In West Northamptonshire this means having the same shared values when working together to plan and deliver support to improve the quality of life for people and communities in an honest, fair, and accountable way.

All parties have equal relationships and hold the voice of the child and young person in the centre of the partnership. All partners work collaboratively to the agreed values, from start to finish to review and refine services together and this happens at all levels.



GOLDEN THREADS

GOLDEN THREAD TWO: INCLUSION

In West Northamptonshire inclusion means that all children and all young people are welcomed and accepted in their local communities, schools and other services that support them. True inclusivity is where differences are seen as a benefit, and where perspectives and differences are shared, leading to better decisions, services and life experiences for children and young people with Special Education Needs and Disabilities and their families. At the heart of inclusion is being and feeling included; ensuring everyone is treated with equity, dignity and has fair access to resources and opportunities.



GOLDEN THREAD THREE: THRIVE

TRUST

We are honest, fair, transparent and accountable. We can be trusted to do what we say we will.



HIGH PERFORMANCE

We get the basics right and what we do, we do well. We manage our business efficiently.



RESPECT

We respect each other and our customers in a diverse, professional and supportive environment.



INNOVATE

We encourage curiosity, we are creative and seize opportunities to grow individually as an organisation and as an area.



VALUE

We continually strive for best practice and ways of improving existing procedures, practices and systems and thereby promoting efficiency and cost effectiveness.



EMPOWER

We believe in people, will listen, learn and trust them to make decisions. We help people to realise their ambitions.



OUR SIX PRIORITIES

The feedback from the co-production events has been collated and has identified **six priorities**.

PRIORITY 1	ACCESSIBILITY
PRIORITY 2	RESOURCES
PRIORITY 3	IDENTIFICATION AND ASSESSMENT
PRIORITY 4	TRAINING
PRIORITY 5	ALTERNATIVE PROVISION
PRIORITY 6	PREPARING FOR ADULTHOOD

We will develop detailed and specific delivery plans for each priority that cover the three years of the strategy. These are being co-produced through the SEND Improvement Board, which provides multi-agency governance, including senior leaders from Education, Health, Social Care, parent/carers and the Department of Education.

There will be many layers of delivery plans that sit underneath this strategy. Some of the specific actions that will be achieved in year 1 (2023/24) are;

PRIORITY 1 ACCESSIBILITY

We will launch a new effective co-produced Local Offer.

PRIORITY 2 RESOURCES

We will open 75 new SEND places.

PRIORITY 3 IDENTIFICATION AND ASSESSMENT

We will commission a new Educational Psychology service to clear the backlog of cases.

PRIORITY 4 TRAINING

We will work with our partners to develop and publish a centralised training offer.

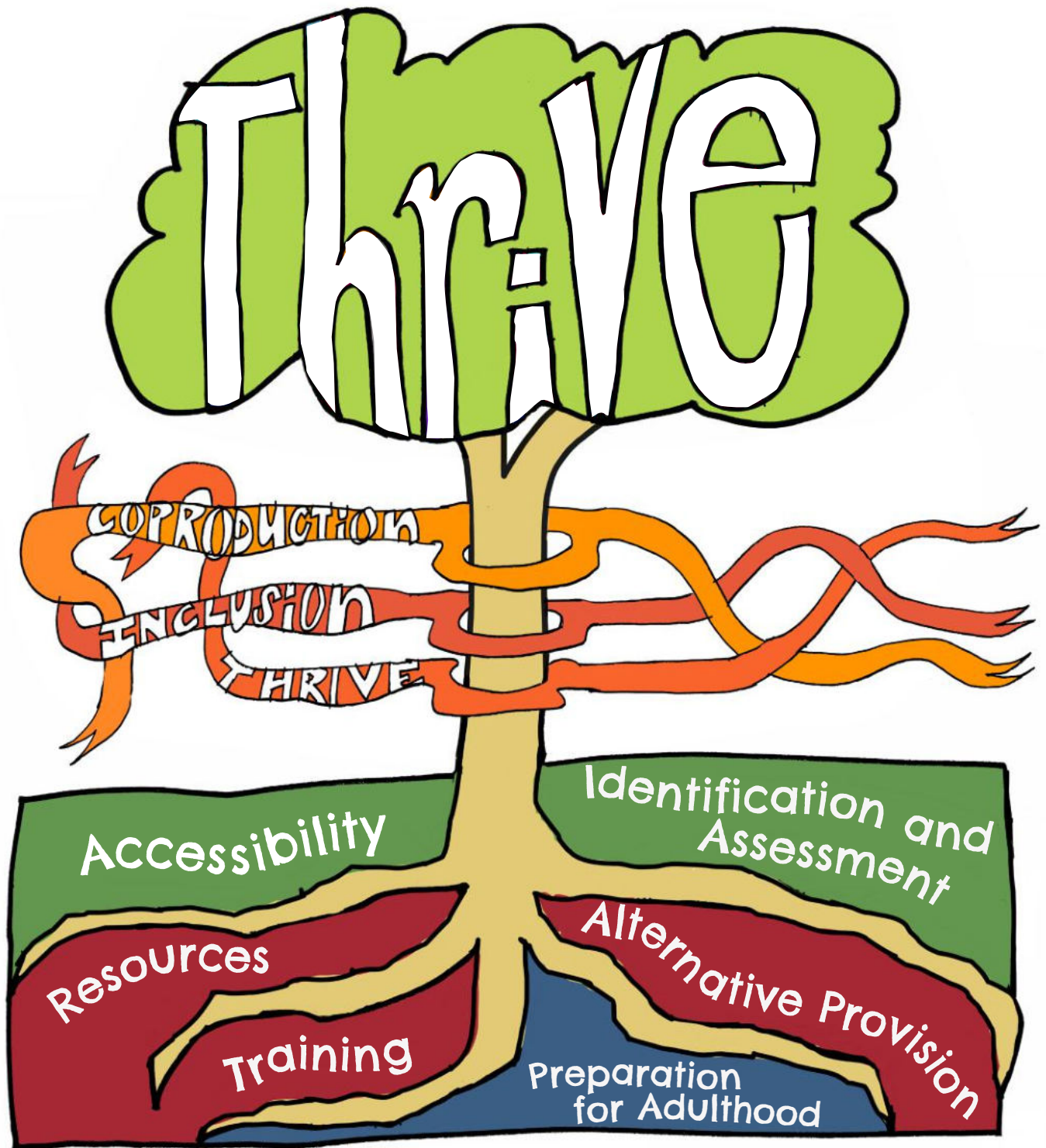
PRIORITY 5 ALTERNATIVE PROVISION

We will co-produce and publish our Alternative Provision plan.

PRIORITY 6 PREPARING FOR ADULTHOOD

We will develop and promote a programme of supported Internships, Traineeships and Apprenticeships.

OUR THRIVE TREE



THE PRIORITIES

1 ACCESSIBILITY



ACCESSIBILITY

- Consistently use straight forward language to communicate clearly using all available channels to support effective two-way communication.
- Review, develop and refine processes together in an open and honest way, to make sure all partners are consistent.
- Develop an effective Local Offer that is easy to use and meets the needs and wants of the local community.
- Provide travel assistance, including home to school transport for children and young people who are eligible for support.
- Ensure admission for specialist units and special schools are based upon need and location.
- Work with provisions to reduce the number of suspensions and permanent exclusions.

2 RESOURCES



RESOURCES

- Ensure there are enough high-quality services and provisions, which are jointly planned and delivered, so children and young people can stay within their local communities wherever possible.
- Use the expertise across all partners to develop best practice.
- Use funding efficiently in a needs-led way and make this process transparent.
- Use evidenced-based best practice, with clear outcomes, to build and monitor the effectiveness of our actions.

THE PRIORITIES



IDENTIFICATION AND ASSESSMENT

- Provide support and training in line with the SEND Ranges to ensure a consistency of approach from all partners for SEN Support and EHC processes, in accordance with the Special Educational Needs and Disabilities Code of Practice.
- Continually improve the timeliness and quality of assessment and reviews in line with statutory requirements.
- Work collaboratively to provide joined-up support so that children and young people can effectively transition between settings.
- Ensure that services effectively work together to provide support.



TRAINING

- Identify, invest, and provide a rolling program of evidence-based training for everyone, including practitioners, families and carers, so that children and young people with SEND receive the right support, in the right place and at the right time within their community.
- Use evidence about supporting children who have had traumatic experiences to ensure effective support.
- All partners have an accurate and shared understanding of SEND.
- All partners are equipped to identify needs as early as possible.
- All partners understand appropriate strategies to support and meet needs.

THE PRIORITIES

5 ALTERNATIVE PROVISION



ALTERNATIVE PROVISION

- Ensure the needs are met for young people in Alternative Provision and support reintegration into mainstream schools, where possible.
- Co-produce and implement an Alternative Provision strategy with transparent decision-making, funding, planning, purchasing and monitoring of provision.
- Reduce the number of suspensions and permanent exclusions.

6 PREPARATION FOR ADULTHOOD



PREPARATION FOR ADULTHOOD

- Ensure all partners have a rolling programme of evidence-based training to secure a shared understanding of what is needed for young people as they prepare for adulthood.
- Ensure that Preparation for Adulthood pathways are clear and accessible.
- Support successful well-planned transitions from the earliest stages through to transitioning to adult services.
- Ensure that young people and families can access clear information about services and support available, including post-16 education options along with building independence, housing, good health, developing friends and family relationships and participating in society.
- Support young people to successfully prepare for employment by developing and delivering Supported Internships, Traineeships and improving accessibility of Apprenticeships.

Governance

Our SEND and Alternative Provision Strategy will be monitored by the SEND Improvement Board. It will be reviewed annually so that we can assure that it is effective and has the desired impact.



CONTACT US

West Northamptonshire Council
www.westnorthants.gov.uk
WNCSEND@westnorthants.gov.uk

Integrated Care Northamptonshire
www.icnorthamptonshire.org.uk/contact
northantsicb.communications@nhs.net

Northants Parents Forum
www.npfg.co.uk
enquiries@npfg.co.uk

Northamptonshire Children's Trust
www.nctrust.co.uk
childrenstrust@nctrust.co.uk



WEST NORTHAMPTONSHIRE COUNCIL CABINET

11 July 2023

**Portfolio Holder for Economic Development, Town Centre Regeneration
and Growth: Councillor Daniel Lister**

Report Title Northampton Towns Fund Leisure Project: Update

Report Author Kevin Langley – Head of Major Project and Regeneration
Kevin.langley@westnorthants.gov.uk

Contributors/Checkers/Approvers

West MO	Catherine Whitehead	14/07/2023
West S151	Martin Henry	14/07/2023
Other Director/SME	Jane Carr	14/07/2023
Head of Communications	Becky Hutson	14/07/2023

List of Appendices

Appendix A: Record of Decision by the Leader in relation to Northampton Towns Fund Leisure project

Appendix B: Outline Business Case for the Market Walk Shopping Centre

1. Purpose of Report

- 1.1 This report seeks to;
- 1.2 update Cabinet on progress made towards the delivery of the Market Walk Shopping Centre scheme,
- 1.3 Notify Cabinet of the decision taken by the Leader of the Council to approve the Towns Fund business case in order to secure the development scheme and

- 1.4 Agree the associated recommendations relating to the Market Walk shopping centre in Northampton.

2. Executive Summary

- 2.1 The purpose of the Market Walk scheme is to create a prime destination in Northampton for food, drink and entertainment which will attract local residents and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing the town centre including increasing the benefits from the improvements taking place on the Market Square and attracting increased footfall to the Town.
- 2.2 Progress has been made towards the delivery of the project and this is set out below.
- 2.3 In addition, the report fulfils the function of reporting to Cabinet the decision taken by the Leader under urgency procedures, which is included at Appendix 1. This was required to ensure that the Council could secure the best development partner and commercial arrangements at a viable price and avoid the Council's interest becoming known and driving the costs up.

3. Recommendations

- 3.1 That Cabinet:
 - a) notes the update on delivery of the Northampton Towns Fund Leisure Project; and
 - b) notes the decisions taken by the Leader of the Council set out at Appendix A.

4. Reason for Recommendations

- 4.1 Where decisions that would otherwise be taken by the Leader and Cabinet have been taken by the Leader alone, in the interests of transparency, the decision is reported to the next available meeting of the Cabinet.
- 4.2 The decision taken provided the authority for the Council to:
 - a) approve the Outline Business Case for the Market Walk Shopping Centre project
 - b) note that Northampton Forward have approved the substitution of the grant allocation for Emporium Way to be allocated to the Market Walk Shopping Centre project.
 - c) delegate to the Head of Major Projects and Regeneration authority to take all necessary steps to complete the grant funding agreement for the Market Walk project and secure the site development.
- 4.3 The full reasons for the decision taken are set out in the decision records appended to this report.

5. Report Background

- 5.1 The Market Walk Shopping Centre scheme will create a prime destination in Northampton for food, drink and entertainment which will attract local residents and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing

the town centre including increasing the benefits from the improvements taking place on the Market Square.

- 5.2 The project will create a space for multiple independent food operators, that will serve a wide variety of cuisine from local independent traders based around a central events space within the building. A number of retail units would be transformed into leisure uses including restaurants and bars.
- 5.3 The lower ground floor of the building will offer competitive socialising activities that could include activities such as mini golf, darts, shuffleboard, karaoke booths and ten pin bowling, with the final mix of uses to be determined after market testing.
- 5.4 Food and leisure units will be located around a communal seating area focused on a main stage, which would provide a space for live music performances and entertainment. The former shopping centre will have the frontages improved on both the Market Square and Abington Street to increase the activation of the public realm and improve tired facades. This will also help provide a natural flow of visitors between the Market Square and the all weather indoor leisure facilities in Market Walk.
- 5.5 The redevelopment of the Market Walk Shopping Centre offers an opportunity to meet an identified need for key town centre development, which in turn will encourage footfall and diversify the town centre offering. Based on current projections undertaken by the operator of the scheme, it is estimated that the completed scheme will generate footfall in the region of 1,000,000 per year.
- 5.6 Without intervention, it is likely that Market Walk will remain in a redundant and vacant retail state following the decline in the retail market and the impact of COVID-19 in the town centre. This is likely to cause a decline in footfall to this part of the town centre, having an adverse effect on the immediate surrounding area and in particular the proposals for Market Square.
- 5.7 There has been no significant interest in Market Walk over the last 3 years and no proposals for any viable redevelopment proposals or requests for a change in use, during which the site has been predominantly vacant. Without intervention it is likely that Market Walk will remain in a redundant and vacant retail state and have an adverse effect on the immediate surrounding area and in particular the proposals for the wider Market Square regeneration.
- 5.8 There are significant viability challenges associated with developing the site without the Towns Fund investment, which justified the need for public /authority intervention. This report seeks approval to enter into a Grant Funding Agreement with the developer and use the Towns Fund grant to cover the viability gap identified in the OBC (Section 4- Financial Case) to facilitate the development.
- 5.9 Market Walk Shopping Centre received the third highest number of votes in the TIP consultation, strongly supporting the redevelopment. 60% of respondents felt that the project was essential to Northampton's regeneration. At the time it was rated as having too high a risk around delivery within the timescales set by Government. However, since the council has now been approached

by a developer who have produced a scheme proposal and a programme which will see Market Walk redeveloped within the time frame set by Government.

5.10 A business case for the redevelopment of Market Walk has been developed and independently appraised by Hatch Ltd and subsequently approved by the Northampton Forward Oversight and Delivery Group on the 5th September 2022 and was subsequently approved virtually by the Northampton Forward Board.

5.11 The Hold Group were responsible for delivering Stack Newcastle (now in the course of relocation) and Stack Seaburn, two highly successful leisure, hospitality and entertainment venues that have continued to perform strongly throughout the past few years even through the pandemic, bucking the trend in leisure and hospitality. Due to the success of these two sites, the Hold Group are looking to expand into other areas of the country and provide a solution to landlords and local authorities that will reinvigorate the high street and provide an exciting and prospect for the repurposing of retail units.

5.12 The project delivers high value for money with a Benefit Cost Ratio of 2.7. There are several wider non-monetised socio and economic environmental benefits of the project which are summarised below:

- Regeneration benefits – the scale and nature of the scheme will provide transformative regeneration benefits and will have a wider catalytic impact upon Abington Street and Northampton’s town centre beyond the immediate area by increasing investor and occupier confidence in the area. This will assist in enhancing the town’s attractiveness as a residential location to improve demand for town centre living which is a wider key objective of the Town Investment Plan.
- Construction jobs – the development will generate a significant number of new construction jobs during the construction period. It is estimated that it could support a total of c.113 construction jobs.
- Perception and profile – the project will assist in enhancing the perception, image and profile of the town centre.
- Reduce crime and anti-social behaviour – through promoting increased activity in the town centre within a currently derelict shopping centre, including a day and evening offer, the project will improve natural surveillance levels and reduce opportunities for crime locally.

5.13 The Hold Group have a proven track record in delivering successful leisure schemes of this nature which include Stack Newcastle and Stack Seaburn. Although both schemes are built using containers and not repurposed retail units, the concept remains the same. Both schemes have been a catalyst in regeneration for their respective areas increasing footfall and sparking further investment in the locations.

5.14 Stack Newcastle was located on a derelict piece of land in an area of the city that had been neglected for 20 years. Following the arrival of Stack, there was a huge uplift in footfall

changed the flow of people on a night out in the city with obvious benefits to the night-time economy. Stack had such a catalytic effect and is now being relocated to the Pilgrim Quarter a new development as the area they previously occupied is now being transformed into grade A office accommodation for HMRC. During the 4 years of operation the site welcomed over 3 million visitors and turned over £9m of rents received from tenants.

6. Issues and Choices

6.1 The decision taken was necessary to ensure the continued proper running of the Council and its business.

7. Implications (including financial implications)

7.1 Resources and Financial

7.2 The Market Walk Shopping Centre is replacing the Emporium Way project. In the capital programme, it is currently forecasted that the project is made up of £4,006,729 of capital grant funding and £200,000 of revenue grant funding. The capital programme will need to be revised to reflect that all the grant funding (£4.2m) will be used as capital for the project.

7.3 WNC is the accountable body for the Towns Fund grant and will be passporting £4.2 million to the developer from the Towns Fund. The funds will be governed by a grant funding agreement between WNC and the developer and will be paid on the completion of milestones laid out in the agreement and after the acquisition by the developer.

7.4 This grant funding agreement will safeguard the council and put strong governance in place to manage the grant. This will include:

- Ensuring payments will only be made on a stage basis and only for costs incurred
- Checks by a quantity surveyor to ensure the measured works have been undertaken
- Legal charge to secure repayment of the grant if required

7.5 Legal

7.5.1 This report is required to ensure that the Council complies with its constitution in making key decisions relating to the Council's capital assets, even when they are under the management of Northampton Partnership Homes. The Chair of the relevant Overview and Scrutiny Committee has been consulted about this decision.

7.6 Risk

7.6.1 Overall, if the Towns Fund projects are not delivered, there will be significant financial, reputational and political risks for both the council and the developers (see also OBC page 21- Key Dependencies and Constraints).

- Financial risks: If the projects are not delivered within time and deadlines are not met, the council risks losing external funding and faces increased costs within projects through not being able to undertake appropriate due diligence.
- Reputational risks: If the programme of work is not delivered timely, then it weakens the council's position to leverage funding from Government and other external funders in the future. There would also be a reputational hit with the public with many of these schemes already heavily promoted.
- Political risks: As a new authority, the council is under increased scrutiny from Government and the public and if the projects are not delivered efficiently then this can seriously harm the council's perception to these audiences.

7.6.2 There are also risks that are specific to the delivery of the Market Walk Shopping Centre project, these are recorded in a risk register which is regularly reviewed and monitored by the council. Below is a summary of the risks for the projects.

- Not getting planning consent – ensure project manager works closely with planning throughout the process to minimise this risk, although it should be noted that the council, in its capacity as the Local Planning Authority, is entirely independent
- COVID-19 – continued uncertainty around the impacts of the COVID-19 pandemic, particularly with regards to market/occupier demand in the office sector
- Inflation cost pressures – in the past 24 months we have seen unprecedented inflation levels on construction projects. There is contingency allowed for within the appraisals as well as any cost increases being offset by the inflation on sales values

7.6.4 The council will in accordance with the Subsidy Control advice given by DWF have to publish the award of the grant and should do so within 3 months. To mitigate against any challenge of the award/grant on the basis of it being unlawful the council will maintain robust audit trails evidencing its compliance with all required legislation and statutory requirements evidencing such by reference to the Pro Forma attached at Annexure B of this report as well as carrying out any required due diligence in respect of the grantee.

7.6.5 The council is as with all its decisions open to Judicial Review challenge following the publication of the award/grant within the period of normally afforded for such (3 months). The council will need to bear this in mind in terms any further contractual commitments with the developer within this period.

7.7 Consultation and Communication

7.7.1 The council is as with all its decisions open to Judicial Review challenge following the publication of the award/grant within the period of normally afforded for such (3 months). The council will need to bear this in mind in terms any further contractual commitments with the developer within this period.

7.7.2 The council will keep members of the public, partners and other stakeholders informed and engaged on the Market Walk proposals as they progress, including objectives, outcomes and

future benefits, as part of the wider communications strategy and activities for the regeneration of Northampton town centre.

8. Background Papers

None

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WEST NORTHAMPTONSHIRE COUNCIL
RECORD OF DECISION

Date Of Decision:	15 th September 2022
Title:	Northampton Towns Fund Leisure Project
Is this a “Key Decision”?	Yes
Purpose:	<p>To seek approval of the business case for the Market Walk Shopping Centre and approvals to deliver the project.</p> <p>The reason this is not going to Cabinet and is being exercised using the Leader of the Council’s powers is due to the confidentiality and sensitivity with regards to the acquisition of the shopping centre. Heads of Terms have been agreed with the developer and the owner of Market Walk for a price of £2m. The owners are not currently aware that the Council are involved in the project and if they were to find out it is highly likely they will seek to increase the price. If the price were to increase beyond £2m the Council could not justify this and it would mean that the Council could not grant the developer funding for the project.</p>
Cabinet Member:	Cllr Dan Lister, Cabinet Member for Economic Development, Town Centre Regeneration & Growth
Decision Maker:	Cllr Jonathan Nunn, Leader of the Council
Consultation and Scrutiny:	Market Walk Shopping Centre received the third highest number of votes in the TIP consultation, strongly supporting the redevelopment. 60% of respondents felt that the project was essential to Northampton’s regeneration.
Officer Recommendations:	<ul style="list-style-type: none"> • approve the Outline Business Case for the Market Walk Shopping Centre project • note that Northampton Forward have approved the substitution of the grant allocation for Emporium Way to the Market Walk Shopping Centre project. • delegates to the Head of Major Projects and Regeneration authority to take all necessary steps to complete the grant funding agreement for the Market Walk project.
Decision Taken:	
Reasons For Decision:	<p>The recommendations are being made to:</p> <ol style="list-style-type: none"> a) enable the regeneration of the vacant Market Walk Shopping Centre b) enable draw down of the £4.2m of Towns Funding allocation c) support the regeneration and economic wellbeing of Northampton Town Centre. <p>The Without intervention, it is likely that the Market Walk Shopping Centre will remain in a redundant and vacant retail state following the decline in the retail market exacerbated by the impact of COVID-19 in the town centre. This is likely to cause a decline in footfall to this part of the town centre, having an adverse effect on the immediate surrounding area and in particular the proposals for the wider regeneration of Market Square.</p>

Alternative Options Considered (Including Reasons For Rejection):	Alternative decision to decline approval of the business case and funding for this project will mean it not being able to take place as the project is reliant on the Towns Fund monies. This would mean that the funding allocated by Government will be lost and not used for the regeneration of Northampton town centre. All Towns Funding needs to be allocated by the end of September 2022.
Declarations of interest:	

Authorised By Relevant Cabinet Member/Chief Officer/Deputy Chief Officer:

Name: Stuart Timmiss, Executive Director Place, Economy & Environment

Date: 15th September 2022

MARKET WALK SHOPPING CENTRE, NORTHAMPTON PROJECT

OUTLINE BUSINESS CASE

**DEVELOPED IN RESPONSE TO THE
NORTHAMPTON TOWN DEAL**

**ON BEHALF OF WEST NORTHAMPTONSHIRE
COUNCIL**



26 August 2022

CONTENTS

1.	Executive Summary	3
2.	Strategic Case	7
3.	Economic Case	24
4.	Financial Case	40
5.	Commercial Case	48
6.	Management Case	54
	Appendix A – Development Appraisal Summary	61
	Appendix B – Order of Cost Estimate (Turner & Townsend)	62
	Appendix C – Subsidy Control Compliance Advice Note	63

1. Executive Summary

Purpose of this Outline Business Case

This Outline Business Case (OBC) has been developed by Cushman & Wakefield in conjunction with West Northamptonshire Council (the “Council”) in response to the Government’s Town Deal programme. Following the approval of the Northampton Town Investment Plan, this OBC seeks approval for £4.175m of Town Deal capital grant investment and has been developed in accordance with Town Deal and wider MHCLG Appraisal Guide and HMT Green Book requirements, adopting principles of proportionality as agreed. Given the scale of the funding ask, it is agreed that a proportionate approach to the Business Case can be adopted as per the latest HMT Green Book, particularly in the Economic Case, where for example, only two intervention options are shortlisted through to full economic appraisal (do something versus a “Business As Usual” BAU scenario).

Strategic Case

The subject site currently comprises a large vacant shopping centre, known as Market Walk. The centre has formerly been occupied by retailers including Dorothy Perkins, Zara Beauty, Lucci Leather, Swishing, Cynthia Spencer Hospice, Rendezvous Coffee Shop, Fitness Inc, Bohemian Finds, Aflora and Luxe Gifts, Evans, Bias and others. Following the decline in the retail market, the Shopping Centre has become redundant and as such, has been earmarked for a redevelopment / repurposing opportunity.

The site occupies a strategically important position within the town centre, with Abington Street being a key arterial route through the retail core and linking the site to Northampton Railway Station. The Market Walk Shopping Centre also fronts onto Market Square, a key regeneration site identified in the Town Centre Masterplan, published in October 2019. Introducing a new leisure offering to this area will increase and diversify the existing offer and will support the regeneration of Market Square.

An initial site masterplan has been prepared by UrbanEdge Architects, on behalf of ARBA Group, comprising a food and beverage focused leisure offering in the shell of the former Market Walk Shopping Centre.

The creation of a space for multiple independent street food operators is proposed, that will serve a wide variety of good quality, modern street food cuisine from local independent traders. A number of retail units would be transformed into bars, each with their own unique look and offer, and there will also be provision for competitive socialising including various leisure activities. The bars and street food units would be located around a communal open seating area focused on a main stage, which would provide a space for live music performances and entertainment. The centre would retain active frontages to Market Square and Abington Street. A key element will be to create an external space that offers outdoor drinking and dining, which is currently envisaged to be achieved through the inclusion of a retractable roof.

The repurposed Shopping Centre will create a prime destination in Northampton for food, drink and entertainment which will attract local residents and workers, and visitors from neighbouring areas. It will also act as an anchor to support the Council’s focus on transforming and enhancing Market Square as a prime events space.

It is recognised that the unprecedented levels of change experienced by Northampton’s Town Centre in recent times have created a series of challenges it must tackle and overcome, including:

- Creating a Vibrant and Welcoming Town Centre
- Providing the Conditions for Business to Flourish
- Creating a Town Centre that Benefits all of our Communities

The redevelopment of the Market Walk Shopping Centre offers an opportunity to meet an identified need for key town centre development, which in turn will encourage footfall and diversify the town centre offering. Without intervention, it is likely that the Market Walk Shopping Centre will remain in a redundant and vacant state following the decline in the retail market and the impact of Covid-19 in the town centre. This is likely to cause a decline in footfall to this part of the town centre, having an adverse effect on the immediate surrounding area and in particular the proposals for Market Square.

There are a range of market failures constraining investment in Northampton, with the market failures impacting the re-development of the Market Walk Shopping Centre predominantly focused around public goods and viability challenges, as set out in this Strategic Case. The cost of undertaking the redevelopment of the Shopping Centre, alongside the cost of acquiring the property and making capital contributions to secure occupiers, is greater than the value of the scheme, resulting in a viability gap. Due to this, the site would not be delivered by the market, in the absence of the Towns Fund investment, which justifies the need for public intervention.

Economic Case

In summary, the Economic Case demonstrates that the preferred option could achieve a marginally 'acceptable' value for money position with a BCR of exactly 1.0 when appraised using the Land Value Uplift plus wider external benefits approach.

However, when assessed using the place-based approach, the preferred option has the potential to generate a 'high' value for money position with a BCR of 2.9.

The preferred option fully aligns with the scheme's SMART objectives and whilst the LVU based BCR is only marginally acceptable (and the risks of this falling below 1 must be acknowledged), the strategic rationale for intervention and the above wider non-monetised benefits should be accounted for in the overall assessment of the value for money of the preferred option as accepted and recommended in the latest version of the Green Book. The place based BCR also gives some comfort of the VFM position given the risks around the LVU based BCR falling below subject to changes to scheme costs/benefits. In our view, either approach to benefits monetisation could be justified in this instance and we have presented both scenarios to allow the appraiser to understand the BCR implications of each. Ultimately, it would seem logical to argue that the place based approach is relevant to a Towns Fund scheme of this nature.

Financial Case

The Financial Case has set out in detail the various revenue and cost assumptions which support the development appraisal undertaken for the Market Walk site.

Based on the appraisal undertaken by Cushman & Wakefield, a viability gap in the order of £4.175m has been identified, which is proposed to be met through Towns Fund funding.

Aside from the public sector gap funding outlined above, which is required as a result of the negative viability position of the scheme, we have assumed and are confident that the delivery of the scheme would be funded through commercial funding sources.

Commercial Case

The Commercial Case has considered market sentiment, demand and demographic analysis in order to demonstrate demand for the proposed Market Walk scheme.

The Hold Group are responsible for delivering Stack Newcastle and Stack Seaburn, two highly successful leisure/hospitality and entertainment venues that have continued to perform strongly throughout the past few years even through the pandemic, bucking the trend in leisure & hospitality.

This Commercial Case has also demonstrated the capability and track record of ARBA Group as a developer, providing examples of successfully delivered projects and an overview of the company.

Whilst Northampton's retail and leisure sector has suffered due to the compounding effects of Rushen Lakes, the Covid pandemic and the shift to online shopping, there is a huge opportunity to reimagine the role that leisure/hospitality plays in creating a new town centre anchor by transforming the currently vacant Market Walk Shopping Centre.

The repurposed Shopping Centre will create a prime destination in Northampton for food, drink and entertainment which will attract local residents and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing Market Square as a prime events space.

Northampton's current leisure and F&B offer is substantial with 119 F&B businesses located within the town centre (source Northampton Town Centre BID Directory). There is a mix of independent operators, national chains, and multi-site operators, which all offer a more traditional dining/drinking experience.

There is no business currently operating in Northampton or in the wider County that offers a multipurpose venue with independent street food traders, bars, and entertainment, demonstrating there is a gap in the market for this type of offer.

It is anticipated that the scheme will be delivered through a form of Development Agreement and Grant Funding Agreement between the developer (ARBA Group) and WNC, with the latter effectively acting as the accountable body for defrayment of the Towns Fund grant.

Management Case

WNC will be the Accountable Body for defrayment of the Towns Fund grant associated with the project, and will be responsible for overseeing the financial management and accountability monitoring of the Project.

WNC has an existing team who will supply project management and delivery expertise and will draw in partner resources when relevant, to ensure that the project and partners comply fully with funding legislative requirements.

The project team has a strong and demonstrable track record in delivering major, transformational projects. The Council has put in place the arrangements for successful delivery of the interventions including; a robust governance structure, risk and change management plan, and a system for monitoring and evaluating post-delivery benefits.

As outlined elsewhere in this Business Case, a wide range of benefits are forecast to be generated through delivery of the programme. We recognise the importance of having robust arrangements in place to allow benefits to be captured and to be alert to instances where there may be challenges to achieving anticipated benefits. As such, WNC, in conjunction with ARBA Group plans to develop KPIs as part of the M&E strategy, rather than defining them all at this point.

The development of the Town Investment Plan has been guided by community and stakeholder consultation throughout its development. The development of the Northampton Town Investment Plan has been overseen by Northampton Forward Board; a public / private partnership board established in early 2019.

Online consultations on the potential TIP proposals were held in September 2020 to determine the community's priorities for investment, gain feedback and opinions on a range of proposed investment areas and determine the challenges / opportunities for the town. The consultation identified that Town Centre Public Realm and Market Walk were seen to be the most beneficial to improving the town centre with regards to regeneration. 51% of all participants identified that the Market Walk project would be extremely beneficial to the town centre.

2. Strategic Case

Background

The subject site currently comprises a large vacant shopping centre, known as Market Walk. The centre has formerly been occupied by retailers including Dorothy Perkins, Zara Beauty, Lucci Leather, Swishing, Cynthia Spencer Hospice, Rendezvous Coffee Shop, Fitness Inc, Bohemian Finds, Aflora and Luxe Gifts, Evans, Bias and others. Following the decline in the retail market, the Shopping Centre has become redundant and as such, has been earmarked for a redevelopment / repurposing opportunity.

The site is located within Northampton Town Centre, around half a mile to the east of Northampton Railway Station and around a quarter of a mile to the northeast of Northampton Bus Station.

The site fronts Abington Street to the south, Market Square to the west and Wood Street to the east. The eastern most part of the site is bounded by existing development. The wider surrounding area of the site is predominantly retail, given the town centre location. The Grosvenor Shopping Centre and multi storey car park are located in the immediate vicinity of the site.

The freehold interest in the site is currently owned by CFC 52 LIMITED (Co. Regn. No. 07268031) of 1A Kingsley Way, London N2 0FW. ARBA Developments Limited have agreed Heads of Terms (HoTs) to purchase the freehold interest for a price of £2,000,000. This offer is subject to the following conditions:

- Planning Permission. Receiving a Planning Consent for (Class E use and Sui Generis Entertainment Venue
- Licencing. An acceptable licence being granted.
- Vacant Possession on completion
- Contract

The agreed acquisition price does not take account of the potential Towns Fund funding support.

The site occupies an important position within the town centre, with Abington Street being a key arterial route through the retail core and linking the site to Northampton Railway Station. The Market Walk Shopping Centre also fronts onto Market Square, a key regeneration site identified in the Town Centre Masterplan, published in October 2019. Introducing a new leisure offering to this area will increase and diversify the existing offer and will support the regeneration of Market Square.

A site plan and site location plan are included below, at Figure 2.1 and Figure 2.2.

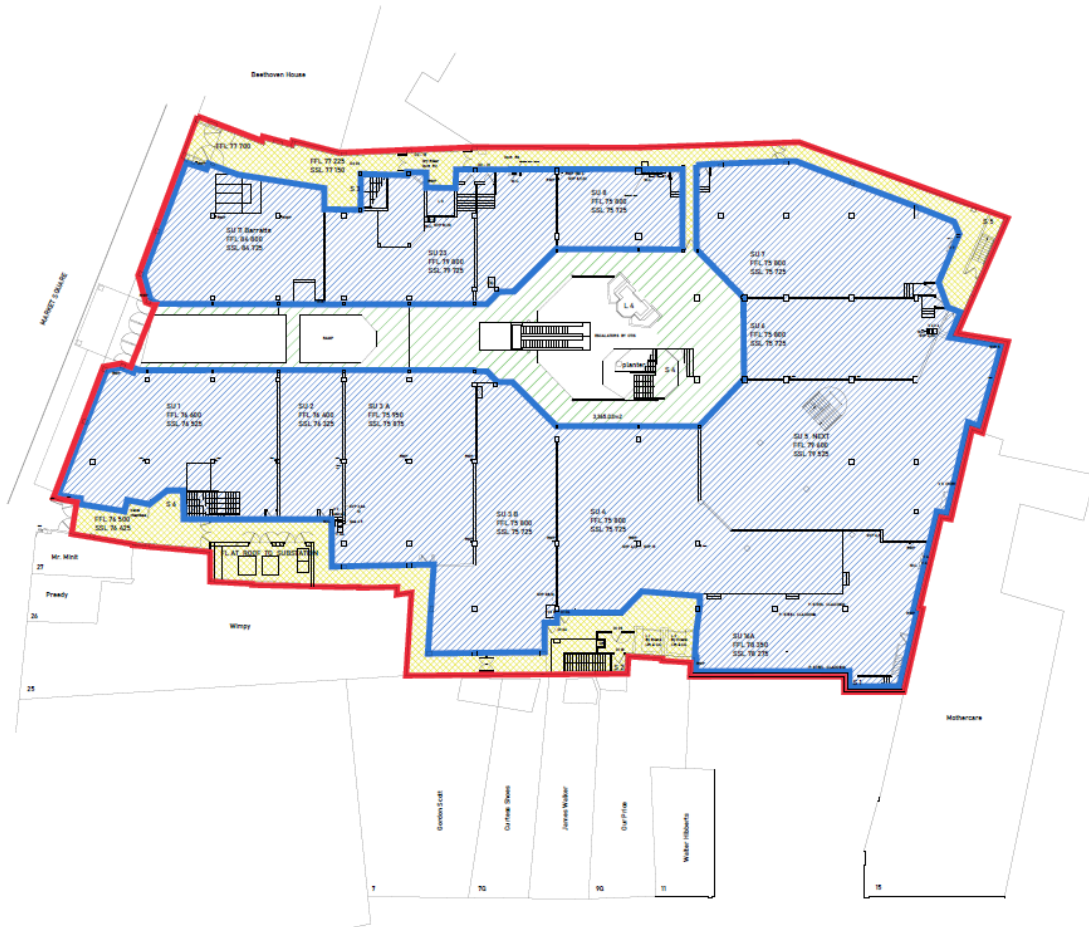


Figure 2.1: Site Plan



Figure 2.2: Site Location Plan

Scheme Proposals

An initial site masterplan has been prepared by UrbanEdge Architects, on behalf of ARBA Group, comprising a food and beverage focused leisure offering in the shell of the former Market Walk Shopping Centre.

The creation of a space for multiple independent street food operators is proposed, that will serve a wide variety of good quality, modern street food cuisine from local independent traders. A number of retail units would be transformed into bars, each with their own unique look and offer, and there will also be provision for competitive socialising including various leisure activities. The bars and street food units would be located around a communal open seating area focused on a main stage, which would provide a space for live music performances and entertainment. The centre would retain active frontages to both Market Square and Abington Street. A key element will be to create an external space that offers outdoor drinking and dining, which is currently envisaged to be achieved through the inclusion of a retractable roof.

The repurposed Shopping Centre will create a prime destination in Northampton for food, drink and entertainment which will attract local residents and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing Market Square as a prime events space.

The Case for Change

Northampton is the County Town of Northamptonshire and is the area's main employment, retail and cultural centre. The town lies on the banks of the River Nene, 67 miles North-West of London and 54 miles South-East of Birmingham. As such, the town is strategically located to benefit and contribute towards the Oxford-Cambridge Arc, a major national Government economic growth corridor. The town is served by the M1 motorway and the Northampton Loop of the West Coast Main Line, offering strong regional and national transport connections.

These attributes mean Northampton is recognised as one of the top towns pursuing high growth strategies in sectors such as automotive, logistics and advanced manufacturing. This in turn contributed to the establishment of the nationally designated Northampton Waterside Enterprise Zone in 2011; 120 hectares of business led development along the River Nene.

Northampton is the largest town in the UK, with a population of 225,700. Over the last 20 years, its population has grown faster than the national rate, at 0.8% per year (ONS mid-year population estimates 2017). Northampton is a net importer of workers, with a workplace population of 153,000, and a jobs density of 1.07 which is significantly above both the regional and national comparisons. The town itself commands a sizeable travel to work area which is roughly in line with the catchment area for Northampton Town Centre.

The University of Northampton is based in the town centre, and is critical for the economic future of the area and supporting skills growth. The introduction of an enhanced competitive socialising experience and good quality F&B / leisure options will play a key role in improving the University experience.

However, the unprecedented levels of change experienced by Northampton's town centre in recent times has created a series of challenges it must tackle and overcome:

- 15% reduction in footfall between 2015 and 2019
- 23 retail businesses vacated the town in 2020
- 21.8% of town centre units were vacant in Q4 2020
- 36.8% decline in prime retail rents achievable between 2017 and 2020

- Only 3% of all office space classed as high quality
- 86.6% of children for whom benefits are claimed
- 47.7% of those in employment are in the 'at risk' categories
- 24,000 crimes took place in Northampton in 2019

The town, therefore, faces a number of critical equity and competitiveness challenges to its economic prosperity and sustainability which must be addressed. The scale and nature of the Market Walk scheme could contribute significantly to this.

Current Position and Challenges

Challenge 1: Creating a Vibrant and Welcoming Town Centre

Northampton town centre is in decline. It is failing to meet the needs of residents and businesses and is not keeping up pace with other regional town centres and retail destinations, including Milton Keynes and Rushden Lakes. Vacancy rates in the primary shopping area are at around 15%, and the town has seen a year-on-year decline in footfall of 14%. The loss of major national retailers has left large vacant premises that have no viable alternative uses creating large disjointed and inactive areas. Many remaining retailers are likely to be on short term and flexible leases, and there is a need to provide confidence for them to continue to invest in the town.

The importance of high-quality amenities to high value employers, particularly professional services firms, is well established. The weakness of the town centre offer is a major barrier to Northampton re-establishing itself as a regionally significant business hub within the Oxford-Cambridge Arc.

The proposal will significantly enhance the town's offer on this key site and will assist to reposition its town centre offer and appeal to wider occupiers and investors, as well as employees and visitors.

Challenge 2: Providing the Conditions for Business to Flourish

Last year there were 1,800 new businesses formed in Northampton. This is a significant opportunity, with start-ups generating employment opportunities in the town and contributing to economic dynamism through innovation and competition. However, as indicated by the 5-year survival rate, the start-up rate is not translating into long-term survival. This represents a significant loss of entrepreneurial and economic capacity for the town.

It is anticipated that the proposals for Market Walk will provide a suitable option for food and beverage start-ups to begin to trade, building up their businesses before being able to relocate into larger longer-term units elsewhere in the town centre. This model has worked elsewhere successfully, especially within the food and beverage sector, and the proposed operator already has a good track record in this regard. The Hold has a proven track record of seeing businesses move out into high street locations and being subsequently successful.

Challenge 5: Creating a Town Centre that Benefits all of our communities

Unemployment is a key challenge across Northampton. Despite the high number of jobs and major employers located in Northampton, around 5% of the working age population are unemployed. This is higher than both the regional average (3.8%) and national average (4.0%). Northampton has been particularly badly hit by Covid-19, with the claimant count increasing by 160% between January and September 2020, compared to 127% nationally. Northampton has also seen a higher proportion of its workforce furloughed compared to other areas (258 employees per 1,000 working age residents in August, compared to 230 across England). *Source of Statistics: Northampton Town Investment Plan.*

There is an opportunity to make the town centre more inclusive for all communities. The online consultation held in September 2020 found that residents wanted the town centre to be open to everyone. There was also an identified need to deliver a greater diversity of uses for all residents (including the young and elderly), placing importance on the provision of community centres, activities and community spaces. The proposal for Market Walk Shopping Centre will be aimed at a broad demographic range, both in terms of age and also pricing, and could contribute heavily to this Challenge. The Hold provides free entertainment, including an active children’s programme in school holidays, making it accessible to residents from all income backgrounds.

Rationale for intervention and impact of not intervening

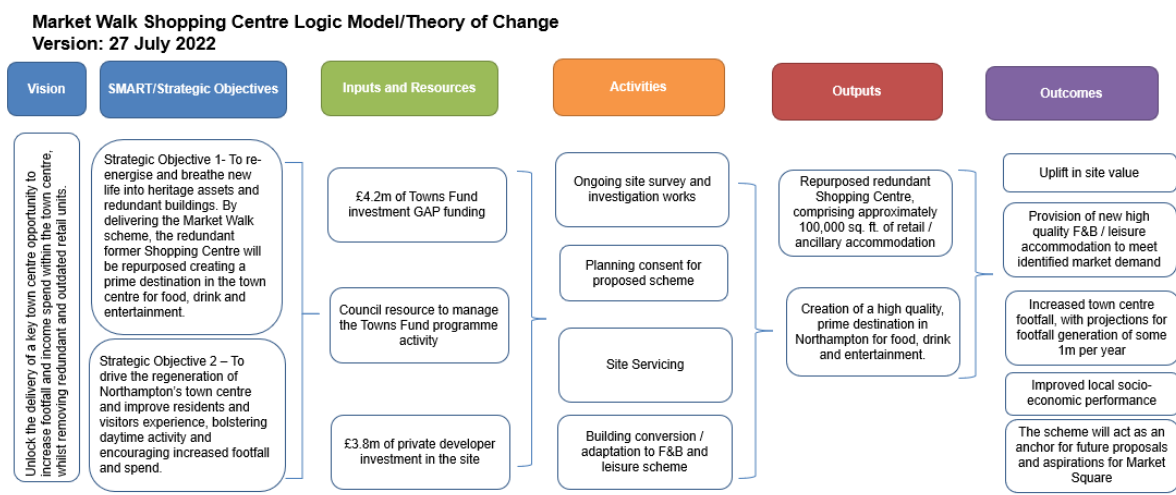
The redevelopment of the Market Walk Shopping Centre offers an opportunity to meet an identified need for key town centre development, which in turn will encourage footfall and diversify the town centre offering. Based on current projections undertaken by the proposed operator, it is estimated that the completed scheme will generate footfall in the region of 1,000,000 people per year.

Without intervention, it is likely that the Market Walk Shopping Centre will remain in a redundant and vacant retail state following the decline in the retail market and the impact of Covid-19 in the town centre. This is likely to cause a decline in footfall to this part of the town centre, having an adverse effect on the immediate surrounding area and in particular the proposals for Market Square. Any proposal to demolish the Shopping Centre and redevelop the site would be extremely challenging given the interlinkages with surrounding properties and would have significant viability challenges, amongst other constraints. Repurposing the centre reduces the need for waste disposal and construction, and reflects a superior option with regards to sustainability.

As set out further within the Financial Case, there are significant viability challenges associated with the proposed scheme such that the site would not be delivered by the market, in the absence of the Towns Fund investment, which justifies the need for public intervention. The cost of acquiring the shopping centre and the redevelopment costs are greater than the scheme values achievable, therefore resulting in a viability gap.

Theory of Change and Expected Outcomes

The theory of change, and expected outcomes linked to this are presented in the below Logic Model.



Market Failure

Market failure is where the market mechanism alone cannot achieve economic efficiency. There are a range of market failures constraining investment in Northampton. The market failures impacting the re-development of the Market Walk Shopping Centre are outlined below:

Quasi-Public Goods and Positive Externalities

Several investments relating to public realm and gateways to the town have the qualities of public goods and are the types of investment that local authorities would take responsibility for. In some cases it may be possible to raise funding from developer contributions. However, whilst development is not forthcoming this investment will not materialise. The site currently comprises a large redundant shopping centre, and as evidenced by the Financial Case, the viability challenges presented by the redevelopment of the vacant shopping centre are substantial. In the absence of Town Deal funding, it is unlikely that the ARBA Group will acquire the site due to a lack of viability, and moreover, there are no other currently available public sector funding sources to address the scheme viability gap.

Therefore, it is likely that without public sector intervention, the redevelopment to deliver these public benefits to the local area, and wider town centre, beyond the occupiers/owners of the site, would not materialise. The site is in private ownership, and the Council has identified the opportunity to work with a delivery partner to acquire the land interest and help facilitate the redevelopment of this key town centre site. This will therefore address a quasi-public goods failure in that the scheme will deliver wider benefits to society which a developer would not benefit from directly and thus would not commit to delivery on the back of.

The scheme as proposed will deliver wider societal benefits to the local area through bringing back into productive economic use a vacant brownfield site with a redundant existing use. The site is currently a brownfield site with negative externalities associated with its nature as a large redundant building within the main retail core (encouraging crime/anti-social behaviour and serving as a blight on the wider area). The scheme will address these and deliver wider positive externalities across the wider area, particularly through diversifying the town centre offering, encouraging footfall and town centre dwell time. The scheme will animate the Shopping Centre 7 days a week from morning until late evening and will provide a transition between the daytime and evening economy in the town centre.

In a “business as usual” scenario, Market Walk is highly likely to remain vacant, as the decline in the retail market has made the shopping centre style of retail accommodation somewhat obsolete in this location and therefore, the prospect of re-letting the currently vacant units is very limited, particularly given the vacancy rate in the town centre. Any form of site redevelopment or building repurposing would be likely to have a viability challenge requiring public sector intervention of one sort or another. As demonstrated in the Strategic and Commercial Cases, due to the risks associated with retail development it is also unlikely that there would be market appetite from other developers to bring a similar scheme forward in the absence of grant funding in a BAU scenario. The shopping centre is likely to become mothballed over the medium term in this scenario until a public sector funding opportunity arises to fund/finance a viable solution. In this scenario, it is likely that the public sector would need to intervene in the future to enable acquisition and redevelopment of the site.

Viability Challenges

Following on from the above, and as set out further within the Financial Case, there are significant viability challenges associated with the proposed scheme. The cost of undertaking the redevelopment of the Shopping Centre, alongside the cost of acquiring the property and making capital contributions to secure occupiers, is greater than the value of the scheme, resulting in a viability gap. Due to this, the site would not be delivered by the market, in the absence of the Towns Fund investment, which justifies the need for public intervention.

SMART Objectives and Critical Success Factors (CSFs)

The scheme's objectives are presented below and are all considered to be SMART (Specific, Measurable, Achievable, Realistic and Timely). These align with the Logic Model presented above.

- By delivering the Market Walk scheme, the redundant former Shopping Centre will be repurposed creating a prime destination in the town centre for food, drink and entertainment. The proposed scheme involves the repurposing of approximately 100,000 sq. ft. of redundant and vacant retail / ancillary accommodation, by 2024.
- The proposed scheme will provide new, quality accommodation for c.13 / 14 new businesses, and deliver a total of 170 permanent local jobs including venue managers, food managers, supervisors, bar staff, kitchen staff and local marketing and sales roles as well as trader employees, all by 2024 / 2025.
- The proposed scheme will provide local residents and visitors with a place to meet, socialise and network with others. It is estimated that the completed scheme will generate footfall in the region of 1m people per year, by 2024 / 2025.

The scheme's Critical Success Factors are set out below in accordance with HMT Green Book guidance and the long list options in the Economic Case have been scored against these:

- Strategic fit – against the scheme objectives and wider policy and strategy aims (e.g. delivery of a mixed use comprehensive scheme as per the planning allocation)
- Achievability – likelihood of deliverability based on resource and skills requirements
- Supplier capacity and capability – ability of potential delivery bodies to deliver the proposal
- Affordability – likely availability of funding and financing to deliver the proposals
- Potential value for money – ability to maximise social value against cost and risk

Evidence of Demand for Proposal

The Hold, the operator proposed for the market-led offer at Market Walk, currently have two operational sites in the UK under the Stack brand, located in Seaburn and Newcastle. Using these two sites as case studies it has been identified that the new site will:

- Create over 170 permanent local jobs including venue managers, food managers, supervisors, bar staff, kitchen staff and local marketing and sales roles as well as trader employees.
- Customers believe that the existing two Stack developments have a positive impact on regeneration in the area they are located, with over 90% rating the sites 8 or above on a scale of 1-10 for the positive impact the venue had has on regeneration in the area.
- Each Stack development supports the creation of 10-15 new small businesses. The small affordable lettable units provide a breeding ground for restaurateurs and entrepreneurs of the future.
- Visitors to the existing Stack sites have identified that the most popular reason to visit any Stack site is to enjoy the atmosphere and spend time with family and friends, creating a welcome and friendly environment.

Further consideration of demand for the proposal is provided in the Commercial Case.

Integration with other projects/programmes

Northampton Town Investment Plan

The Northampton Town Investment Plan (TIP) sets out an ambitious plan to deliver:

- 15,600 sq. m. of new and refurbished commercial floorspace (including shared workspace). The proposals for Market Walk would significantly contribute part to this.
- 24,900 sq. m. of new public spaces
- 2,300 sq. m. of new or expanded cultural and heritage venues, including new space for skills facilities
- Remediation and enabling works for key sites in the town centre to enable new public spaces, new mixed-use urban quarters, and commercial facilities.

Successful delivery of these outputs and the wider impacts associated with the TIP investments will help achieve the 10-year vision to:

Strengthen – Northampton’s position at the centre of the Oxford-Cambridge Arc by providing modern spaces for creative businesses to capitalise on the town’s manufacturing and entrepreneurial passion.

Create – high-quality housing, digital infrastructure and open spaces that will enable communities to grow and flourish to meet economic, health and wellbeing and environmental challenges.

Build – on the rich heritage and cultural offers to rejuvenate the town centre so it once again represents the aspirations of its residents.

Improve – access to skills and training while promoting first-rate higher and further education opportunities.

An important consideration for the TIP is the extent to which the proposals build on recent and ongoing investments in the town and complement activity by the Council and its partners.

Town Centre Regeneration

The scheme will complement the following activity underway/planned:

- Further development at Northampton Railway Station – to expand and relocate parking provision at the Station and create a new gateway into Northampton, to be delivered by Network Rail. Future proposals for the site include an office and hotel development, subject to further consideration of demand.
- Four Waterside – a cleared five acre site to the south-west of Northampton town centre, near to the central area and the Railway Station. Masterplans for the site outline a mixed-use redevelopment scheme to include speculative development of Grade A offices, as well as a new hotel and residential development. Delivery of this key site will include Towns Fund funding of some £1.5m, as well as Enterprise Zone funding.
- Northampton Museum and Art Gallery - a major transformation to create a high profile cultural attraction for Northamptonshire and the East Midlands. The project has doubled the size of the museum, created four new permanent galleries, and a 400 sq. m. temporary exhibitions gallery, capable of hosting major national and international touring exhibitions.

- Northampton Place Marketing Strategy – being developed to increase future inward investment, increase tourism and improve local perception / civic pride. The strategy will complement the potential initial investment from the TIP and accelerate funding for other projects highlighted in the Masterplan.
- Development at 35 – 39 and 41 – 45 Abington Street – West Northamptonshire Council are progressing proposals for redevelopment of two large, redundant retail units (formerly occupied M&S and BHS) to provide a significant quantum of town centre residential units. Delivery of this key site will include Towns Fund funding of some £9.7m.

Skills and Enterprise Infrastructure

- University of Northampton – a £330 million investment in the relocation of the University to a new campus on the Waterside Enterprise Zone.
- Vulcan Works – a £14 million investment, drawing on SEMLEP Local Growth Fund, ERDF and contributions from NBC was secured to refurbish a Grade II listed Factory and create a new three-storey building comprising 68 lettable units, recently completed in Summer 2021. The units comprise a mix of office, studio and managed workshops aimed at start-ups and growing businesses in the creative sector. During its first 10 years of operation, Vulcan Works is expected to support up to 100 businesses, creating around 300 jobs.

Growth and Connectivity

- City Fibre is in the process of rolling out a £40 million investment in superfast broadband in Northampton which will benefit the town and all proposed investment sites, as well as enabling the deployment of 5G across the town.

Policy and Strategy Context (national, sub-regional and local)

The project's alignment with strategic priorities and policies is set out below:

Strategic Context - Alignment to other policies and strategies

The Town Investment Plan does not exist in isolation. It aligns with existing policies and strategies which will help prioritise and direct wider investment in the town, including:

Northampton Town Centre Masterplan

Developed by the Council to build on the culture, history and heritage of Northampton and transform the heart of town. This will be achieved by creating a smaller and stronger retail core complimented by new residential development serving the needs of the community.

The Northampton Town Centre Masterplan identified the Market Square as a key area for intervention within the town. The masterplan identified that the Market Square's deep-rooted function has always focused around commerce and trade, and that any opportunities in this area will reposition Market Square at the centre of a stronger, consolidated retail core and re-establish the square as the heart of the town centre.

This will be the core principle at the heart of the Hold development, providing a retail opportunity for independent smaller traders.

Northampton Transport Strategy

The Council is also in the process of developing a Transport Strategy which will identify further investment priorities in our transport network, building on the investments set out in this Investment Plan. The Council is also implementing its Local Cycling and Walking Action Plan (2020-31).

The Climate Change Strategy 2020-2023

This establishes a framework for tackling the causes and effects of climate change by: raising awareness of the issues and impacts of climate change on Northamptonshire; reducing emissions of greenhouse gases across the County; and planning for and adapting to the impacts of climate change.

The Oxford-Cambridge Arc Prospectus

This sets out the vision for the Arc to become a global hub for innovation, and home to exemplary models of green development that will inspire communities around the world. Through strong collaboration, the Arc can enhance the lives of its residents, increase the global opportunities for its businesses and improve the environment for the prosperity of all.

SEMLEP Strategic Economic Plan (2017)

The strategic plan sets out how to ensure that the South East Midlands economy not only continues to thrive but contributes even more to the success of UK Plc.

SEMLEP Growing People Skills Plan (2017)

This is a cohesive strategic plan for lifelong skills development working with businesses, organisations, educators, agencies and local authorities.

SEMLEP Energy Strategy (2018)

The route map to secure clean energy to power business and housing growth in line with commitments to cut emissions and improve energy efficiency. The aims of the strategy are:

- To produce an evidence base of the current energy needs of the area for power, heat and transport, along with projected future needs.
- To identify actions to unblock growth over the short term (e.g. infrastructure upgrades, Regulation changes);
- To determine opportunities and options for meeting the area's future energy needs, building on existing technological strengths of the region, including innovative technologies, supply and demand management models and opportunities to reduce carbon impact.

SEMLEP Economic Recovery Strategy (2020)

The action plan to rebuild a resilient economy to respond to the impacts of the Coronavirus pandemic.

People

The COVID-19 pandemic has had an impact upon the local labour market, with some job losses already realised, and more predicted to follow.

Infrastructure Plan

Digital infrastructure is critical to the realisation of a greener future, and also to economic growth and inclusion, as highlighted by the pandemic. SEMLEP and its partners will work together to identify gaps in digital infrastructure and means of addressing them, with a view to establishing full-fibre connectivity across the South East Midlands, including in rural areas.

Business environment

Focus on scale-up activity and diversification will continue alongside support to navigate the EU exit process and promote exporting. Work will continue to promote inward investment, by preparing relevant materials to encourage investment, and by working in partnership with local authorities, developers and commercial agents to help match prospective businesses with appropriate employment land. It will be necessary to assess pandemic induced structural changes to the commercial property market, and to work with partners to ensure the area has an extensive and balanced pipeline of employment land and premises, which meets the need of local businesses, both now and in the future.

Place

Looking ahead, there is a desire to ensure that local places can be sustainable over the long term and, to this end, the South East Midlands aims to be a pioneer of 'Settlements of the Future' concepts. These include smarter, greener energy systems and infrastructure; new spatial approaches to living and working, which support community engagement and incorporate Sport England's Active Design principles; modern methods of construction, including adaptability for the needs of an ageing population; and advanced digital technologies.

National, Regional and Local Planning Policy Context

National Policy and Strategy

The National Planning Policy Framework (NPPF) sets a presumption in favour of sustainable development and a positive approach to planning as a means of supporting the country's economic and housing growth, while protecting the environment. It directs local planning authorities to approve development proposals that accord with the development plan without delay.

Paragraph 8 of the NPPF advises that there are three dimensions to sustainable development, economic, social and environmental. It is advised that all roles are viewed mutually and not in isolation.

Town Centre & Retail

The effective use of land and re-use of previously developed (brownfield) land is encouraged by the NPPF. Paragraph 106 states planning policies should support an appropriate mix of uses, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

Paragraph 86 encourages planning policies and decisions to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Promotion of long-term viability should be reflected in local policy to enable growth and diversification that can respond rapidly to changes in the retail and leisure industries.

Clean Growth Principles - Sustainable design and construction practices will be adopted that exceed minimum Building Regulations compliance. Renewables will be used as a source of heating and energy. Alternative methods of travel such as electric scooters, electric bicycles and other mobility aids will be provided to allow quick connection to the train station only 5 minutes away. Biodiversity and open space will underpin the design principles throughout the buildings. Passive ventilation and sustainable drainage practices will be used throughout.

Local

This section of the report identifies the relevant planning policies within the Development Plan that are relevant to the subject site and the preferred development option. It also highlights key material considerations including national planning policy, the emerging Development Plan policies and Supplementary Planning guidance.

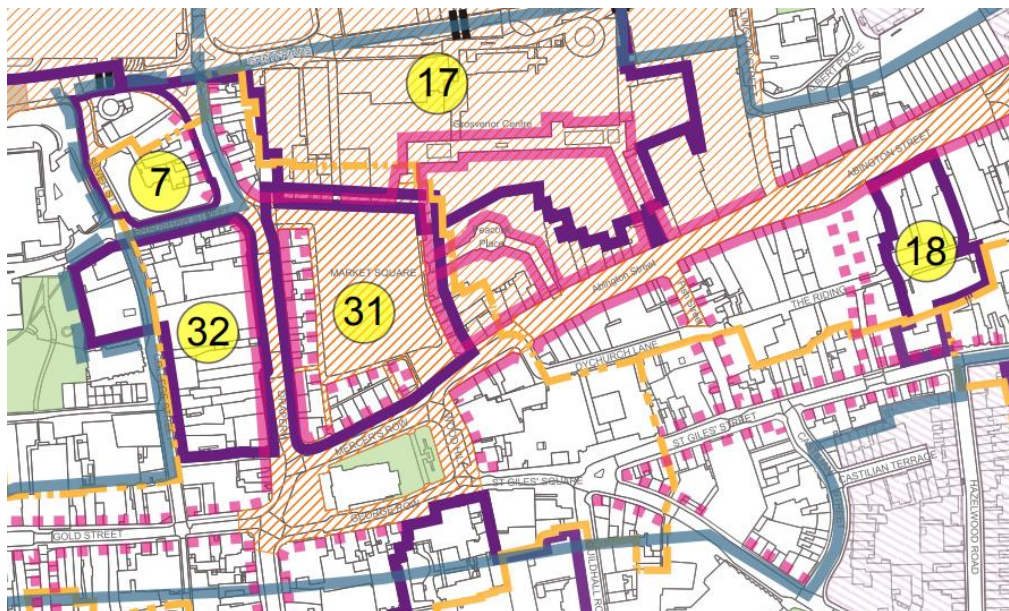
For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004 the adopted Development Plan for Northampton Borough includes inter alia:

- Northampton Local Plan Saved Policies - Adopted 1997
- Northampton Central Area Action Plan - Adopted 2013
- West Northamptonshire Joint Core Strategy Local Plan Part 1 - Adopted 2017

The 1997 Saved Local Plan policies are largely out of date and are not considered in this report.

The Central Area Action Plan (CAAP) is a Plan that provides specific planning policy and guidance for Northampton town centre and adjoining areas where significant regeneration or investment is proposed in the period up to 2026.

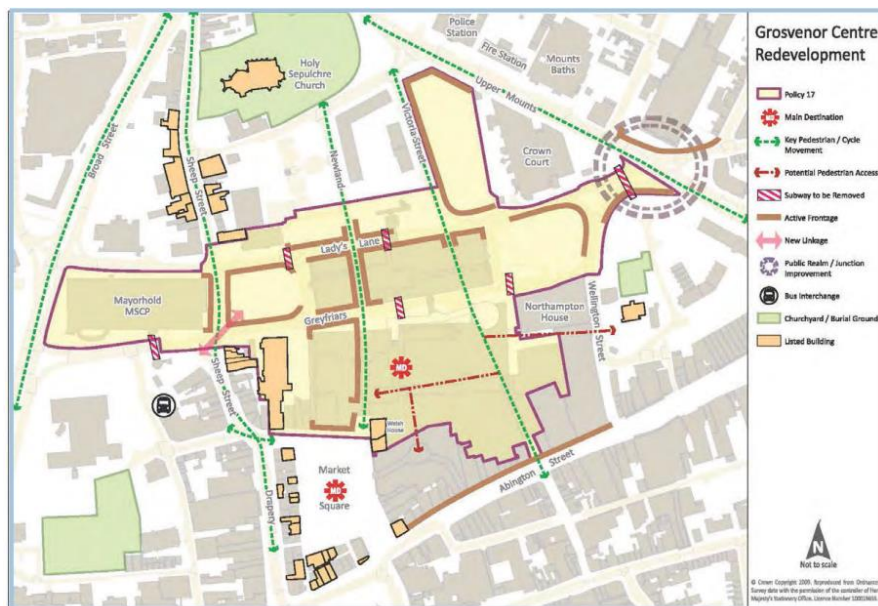
The policies relevant to the subject site are shown on a plan extract below and identify the site as part of Area of Priority Public Realm Improvement (public realm – Policy 3). Site is identified as sitting within the Primary Shopping Area (definition of the primary shopping area – Policy 12) and has Primary Frontage (Policy 13). Market Walk sits immediately west of Market Square allocation (Policy 31) and Grosvenor Centre Redevelopment (Policy 17) immediately to the north.



There are no significant constraints around the site, such as flood risk or listed buildings. The Northampton Conservation Area lies immediately to the west and south west of the site.

The Market Square allocation seeks to establish leisure uses within the Square and to enhance its function and appearance.

The subject site is located adjacent to the Grosvenor Centre Redevelopment site. This is a major redevelopment site in central Northampton. The design aspirations encourage the proposal to provide additional retail floor space, a replacement bus station and to accommodate a mix of other main town centre uses, such as offices, leisure and entertainment, hotel and also residential development.



The site lies within the Greyfriars Character area, which is dominated by large scale and coarse 1970's buildings. These have a direct impact on the permeability of the character area and the wider skyline of Northampton. The design within the area should be of a high standard, should increase permeability where possible and should provide active frontage on the ground floor.

Parking standards (Policy 10) for the Central area zones 1 space / 14 sq. m. (A3 Food and Drink), 1 space/ 25 sq.m. (A1 Shops)

The West Northamptonshire Joint Core Strategy Local Plan (Part 1) sets out the long-term vision and objectives for the whole of the area covered by Northampton Borough, Daventry District and South Northamptonshire Councils for the plan period up to 2029, including strategic policies for steering and shaping development, together with strategic site allocations. The Joint Core Strategy forms part of the Development Plan for the Northampton Borough.

Policy SA (presumption in favour of sustainable development) states that the Council will support development that reflects presumption in favour of sustainable development contained in the NPPF. The Council will work proactively to support and approve proposals that secure development that improves the economic, social and environmental conditions in the area. Applications that accord to policies in the Local Plan will be approved without delay unless material considerations indicate otherwise.

Policy S10 (sustainable development principles) sets out 11 principles for sustainable development. The proposed development must achieve the highest standards of sustainable design, improve environmental performance, use sustainable materials, minimise resource demands and maximise the use of solar gain, passive heating and cooling and ventilation. The proposals should be within walking and cycling distance to services. As well as, promote sustainable drainage, enhance the natural and built environment and heritage assets, create green infrastructure and minimise pollution from noise, air and runoff.

Policy S11 (low carbon and renewables) states that major development should contribute to reductions in carbon emissions and adapt to the effects of climate change through sustainable development principles (Policy S10). All new residential development (including mixed-use) are required to achieve a minimum of Level 4 Standard from 2016 or National Equivalent Standard. All new non – residential development over 500m² gross internal floor space is required to achieve a minimum rating of at least BREEAM very good standard (or equivalent). These requirements will apply unless it can be demonstrated that they would make the development unviable. The proposed scheme repurposes a

major 100,000 sq. ft. Shopping Centre, avoiding demolition and thus reducing the carbon footprint of the investment in the centre of Northampton.

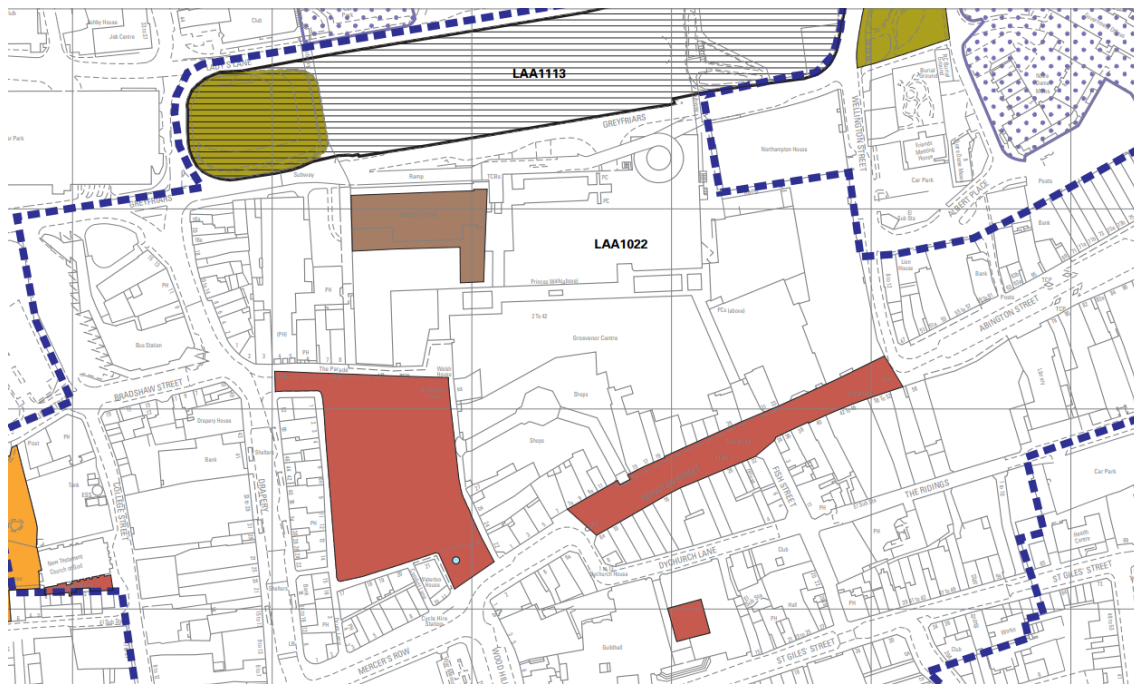
Local Plan part 2 Submission (Regulation 22): 4 February 2021 contains Places Policies for Northampton including Policy 8 (Supporting Northampton Town Centre's Role) and Policy 19 (New Retail Developments and Retail Impact Assessment). The site lies close to the key projects that will shape Northampton in the future.

The site lies within the Town Centre and Primary Shopping Area and Policy 8 and Policy 19 are applicable.

Policy 8 (Supporting Northampton Town Centre's Role) states proposals should contribute positively towards the range of retail, leisure and service-based offers and town regeneration. In particular, mixed-use schemes which provide a balanced mix towards meeting the requirements for town centre uses and housing delivery.

Policy 19 (New Retail Developments and Retail Impact Assessment) supports the provision of convenience retail space and comparison floorspace to meet forecast retail expenditure to 2029. The support will be given to deliver retail within Primary Shopping Area. Within the Primary Shopping Area, developments should not result in the loss of Class A1 retail floorspace with frontage unless alternative use contributes to the vitality of the town centre. The development will have to have an active frontage and be open for business during the day. Change of use of vacant units into alternative main town centre uses or upper floor residential use will be supported if evidence shows that there is a continuous period of vacancy and marketing for 12 to 18 months and that there are no realistic prospects of the unit being occupied for its previous use.

Policy 28 (Open Space) states that new development must ensure that open space defined on the Policies Map is sustained or enhanced. The allocated Civic Space runs in front of the site and to the west from the site (Market Square). Where standards cannot be met on the site, developers will have to contribute to off-site provision.



Any proposal to develop these sites should be accompanied by a site-specific Flood Risk Assessment.

Conclusions

The preferred development option proposes uses that are supported by the adopted and emerging Development Plan, i.e. retail and food outlets. Retail and food outlets are supported within the Town Centre, the use is appropriate in this location and an active frontages would enhance the street scene within Primary Shopping Area.

Policy requirements for access, parking and sustainability must also be taken into consideration. Specifically, non-residential development should reach BREEAM very good requirement.

West Northamptonshire Council (Northampton Area) has several Supplementary Planning Documents. SPD's applicable to the proposal are Parking Standards (2019) sets out parking standards for Northampton. Biodiversity enhancement will have to be secured as set out in Biodiversity SPD (2015). Planning obligations will have to be secured as per the Planning Obligations Strategy (2013) and Community Infrastructure Levy (CIL) adopted in 2015. CIL charge doesn't apply for retail in the central zone.

Key Stakeholders and Beneficiaries

The scheme is supported by a range of key stakeholders including:

- SEMLEP
- Northampton Forward
- Town Centre BID
- Grosvenor Centre Owner (currently Legal and General)
- Town Centre shops and businesses
- University of Northampton
- Northamptonshire Police and Crime Commissioner

Key beneficiaries will include the following:

- Retail, F&B and leisure occupiers in Northampton and the local area, with the increased footfall leading to increased consumer spend.
- Start-up food and beverage providers, with the scheme offering quality new accommodation and enabling flexible short lease terms.
- The construction of the scheme will also create a number of employment opportunities, again potentially in the local area.
- Local residents and workers, who will be able to access the completed scheme and benefit from the increased town centre offer.

Key Dependencies and Constraints

Key dependencies and constraints which could impact on successful delivery as proposed include:

- Resource – West Northamptonshire Council and ARBA Group are working in partnership on the delivery of the development. This will ensure that progress on site is monitored and tracked to ensure that the development is delivered on time.
- Acquisition of Market Walk Shopping Centre – HoTs have been agreed between ARBA Developments Limited and the vendor for the acquisition of the Property. However, the agreed HoTs are conditional and therefore if any of these conditions aren't satisfied there is a risk that the acquisition would not complete.
- Timescales – Should there be delays associated with achieving planning permission, gaining a licence or timescales for redevelopment, this will impact the completion date of the project. The delivery team have developed a timeline to try to mitigate this risk, and indicative timescales discussed to date have been based on a certain degree of caution.
- Securing a Funding Partner – Should there be issues with successfully securing a funding partner for the site, such as a lack of market interest, then this will naturally present a major risk to the deliverability of the project.
- Planning Consent – Achieving planning consent for the proposed scheme is a key dependency with regards to this project. A sufficient timescale has also been allowed for achieving planning consent.
- Occupier Demand – Whilst proposals for the site include The Hold as an operator for the market element, the success of this component of the scheme will still be dependant on a good level of occupier interest in the various stalls / units. The three additional F&B units within the scheme will be delivered on a speculative basis, and therefore, occupier demand in this sub-sector will also be important.

Strategic Case Summary

The subject site currently comprises a large vacant shopping centre, known as Market Walk. The centre has formerly been occupied by retailers including Dorothy Perkins, Zara Beauty, Lucci Leather, Swishing, Cynthia Spencer Hospice, Rendezvous Coffee Shop, Fitness Inc, Bohemian Finds, Aflora and Luxe Gifts, Evans, Bias and others. Following the decline in the retail market, the Shopping Centre has become redundant and as such, has been earmarked for a redevelopment / repurposing opportunity.

The site occupies an important position within the town centre, with Abington Street being a key arterial route through the retail core and linking the site to Northampton Railway Station. The Market Walk Shopping Centre also fronts onto Market Square, a key regeneration site identified in the Town Centre Masterplan, published in October 2019. Introducing a new leisure offering to this area will increase and diversify the existing offer and will support the regeneration of Market Square.

An initial site masterplan has been prepared by UrbanEdge Architects, on behalf of ARBA Group, comprising a food and beverage focused leisure offering in the shell of the former Market Walk Shopping Centre.

The creation of a space for multiple independent street food operators is proposed, that will serve a wide variety of good quality, modern street food cuisine from local independent traders. A number of retail units would be transformed into bars, each with their own unique look and offer, and there will also be provision for competitive socialising including various leisure activities. The bars and street food units would be located around a communal open seating area focused on a main stage, which would provide a space for live music performances and entertainment. A key element will be to create an external space that offers outdoor drinking and dining, which is currently envisaged to be achieved through the inclusion of a retractable roof.

The repurposed Shopping Centre will create a prime destination in Northampton for food, drink and entertainment which will attract locals and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing Market Square as a prime events space.

It is recognised that the unprecedented levels of change experienced by Northampton's town centre in recent times has created a series of challenges it must tackle and overcome, including:

- Creating a Vibrant and Welcoming Town Centre
- Providing the Conditions for Business to Flourish
- Creating a Town Centre that Benefits all of our Communities

The redevelopment of the Market Walk Shopping Centre offers an opportunity to meet an identified need for key town centre development, which in turn will encourage footfall and diversify the town centre offering. Without intervention, it is likely that the Market Walk Shopping Centre will remain in a redundant and vacant retail state following the decline in the retail market and the impact of Covid-19 in the town centre. This is likely to cause a decline in footfall to this part of the town centre, having an adverse effect on the immediate surrounding area and in particular the proposals for Market Square.

There are a range of market failures constraining investment in Northampton, with the market failures impacting the re-development of the Market Walk Shopping Centre predominantly focused around public goods and viability challenges, as set out in this Strategic Case. The cost of undertaking the redevelopment of the Shopping Centre, alongside the cost of acquiring the property and making capital contributions to secure occupiers, is greater than the value of the scheme, resulting in a viability gap. Due to this, the site would not be delivered by the market, in the absence of the Towns Fund investment, which justifies the need for public intervention.

3. Economic Case

Introduction

The purpose of the Economic Case is to identify the proposal that delivers best public value to society. It should present an assessment of the potential intervention options to determine a preferred option on the basis of a value for money/cost benefit assessment. As per the HM Treasury Green Book, demonstrating public value requires a wide range of realistic options to be appraised (the long-list), in terms of how well they meet the spending objectives and critical success factors for the scheme; and then a reduced number of possible options (the short-list) to be examined in further detail. The short-list should ideally include the Business As Usual position (BAU), a realistic and achievable ‘do minimum’ that meets essential requirements, the preferred way forward (if this is different) and any other options that have been carried forward. These options should then be subject to Cost Benefit Analysis (CBA) to identify the option that offers best public value to society. This should account for both monetised and non-monetised benefits to determine this with a Benefit Cost Ratio (BCR) presented for each and consideration of their alignment back to the strategic objectives for intervention should also be considered. Sensitivity and switching value analysis should be undertaken as part of this.

It is acknowledged that the 2022 Green Book update reflects the latest MHCLG/DLUHC approach focusing on land value uplift as the key measure of private benefit for land and property related schemes. Where relevant this should therefore be accounted for along with the monetisation of wider external benefits as appropriate. However, the 2020 Green Book update also introduced a “place based” approach to economic appraisal where this is considered to be appropriate. In this instance, whilst the Towns Fund is a nationally administered MHCLG/DLUHC programme, the nature of the project in the context of it being one of a number within a wider Town Deal for Northampton, aligns strongly with the Government’s definition of a place-based intervention as below. As defined within the Green Book, “place based analysis concerns appraisal applied to geographically defined areas within the UK”. It states that place based analysis is required for two broad categories of proposal:

- proposals with an objective that is specific to a particular place or area or type of area;
- proposals which do not have geographically defined objectives but which appear likely to have different implications either positive or negative for parts of the UK that decision makers will need to understand and may need to take into account.

The Green Book identifies that the relevance and extent of place based analysis will be context specific and a matter of judgement for those developing, appraising and scrutinising business cases. It states that where the proposal has geographically targeted objectives, appraisers should clearly specify whether the employment objectives relate to employment located in the area (including those taken by in-commuters), or to employment of residents of the local area (including in jobs outside the target area). Employment effects should be adjusted for leakage, substitution and displacement as set out below, noting that treatment of these effects depends on the employment objective above. Where appropriate, employment multipliers can also be applied. The Green Book remains silent on the approach to placing a monetary value on the employment impacts derived through place based appraisal and C&W’s approach is therefore to apply a productivity value to these through Gross Value Added (GVA) as the primary measure of this as has been an established approach for a number of years in economic appraisal.

In the case of this project, the economic appraisal has been undertaken on both a national Land Value Uplift (plus external benefits) and local place-based approach to appraisal and the outcomes of both of these approaches are presented below. This approach is considered to be appropriate because whilst the project has the potential to generate significant Land Value Uplift benefits, the scheme is part of a wider Northampton Town Deal programme of intervention which is intended to benefit the town centre and wider West Northamptonshire local authority area as a specific and defined area of intervention and benefit. The benefits of the programme as defined within the Town Investment Plan are to drive the

local economic growth and sustainability of Northampton Town Centre primarily and the focus is thus very much on an objective relating to a specific and defined local geography as opposed to seeking to deliver net additional benefits at a national scale.

It has also been agreed with the Council and its appraisers, that a proportionate approach to business case development is permitted given the way in which the development and appraisal of Town Deal business cases are being administered at a local level as part of a wider programme agreed with DLUHC through the approval of the already submitted TIP. Proportionality has been accounted for in the development of the Economic Case and what this means in practice is that the optioneering process has been condensed and simplified in so far that the cost benefit analysis focuses only on the preferred option versus a no Town Deal/Business As Usual (BAU) option. This approach was agreed with the Council and its appraisers in advance, with the focus very much being on ensuring that the preferred option achieves a value for money outcome as opposed to considering in detail through quantitative CBA, other shortlisted intervention options.

Nonetheless, a full HMT Green Book/MHCLG Appraisal Guide compliant CBA has been undertaken on the preferred option (accounting for the BAU/deadweight position to account for net additionality) as presented below along with an assessment of the non-monetised benefits in arriving at the value for money conclusions that are presented.

Long List Options

Consideration of all potential long list options for intervention that could deliver the scheme's objectives have been considered by C&W with a summary schedule of long list options considered presented below:

Long List Option	Description and Likely Outcome
1 – Do nothing/Business As Usual	No further investment by the Council/wider public sector. The redevelopment of Market Walk will remain stalled as the development will be unviable. As evidenced by the Financial Case of the business case, the viability challenge presented by the redevelopment of the vacant shopping centre is substantial and, in the absence of Town Deal funding, it is unlikely that ARBA Group will acquire the site due to a lack of viability. Moreover, there are no other currently available public sector funding sources to address the scheme viability gap. As such, it is unlikely that the vacant Market Walk Shopping Centre would be redeveloped under a 'do nothing/ BAU scenario'. Under this scenario, Market Walk is likely to remain vacant as the decline in the retail market has made the shopping centre style of retail accommodation somewhat obsolete in this location and therefore the prospect of re-letting the currently vacant units is very limited. Any form of site redevelopment or building repurposing would be likely to have a viability challenge requiring public sector intervention of one sort or another. As demonstrated in the Strategic and Commercial cases of the business case, due to the risks associated with retail development it is also unlikely that there would be market appetite from other developers to bring a similar scheme forward in the absence of grant funding in a BAU scenario. The shopping centre is likely to become mothballed over the medium term in this scenario until a public sector funding opportunity arises to fund/finance a viable solution. In this scenario, it is likely that the public sector would need to intervene in the future to enable acquisition and redevelopment of the site.
2 – Reduced provision of Town Deal grant funding to fund acquisition costs only	Under this option, the Council could provide a reduced amount of Town Deal grant funding to ARBA Group of circa £2m to fund the costs of acquiring the vacant Market Walk Shopping Centre only and no redevelopment costs. This option is unlikely to result in delivery; as the Financial Case of this business case shows, grant funding of at least £4.175m is required to enable the viable delivery of the scheme. If a

Long List Option	Description and Likely Outcome
	lower amount of grant funding was to be provided, ARBA Group are highly unlikely to deliver the scheme due to the presented viability challenges.
3 – Provision of loan funding to ARBA Group to address the scheme viability challenges	Under this option, the Council could provide a loan, rather than grant funding, to ARBA Group to enable the delivery of the scheme as proposed. This option has considerable loan repayment risks; as the Financial Case of this business case shows, the scheme has significant viability challenges which may make repayment of the loan unlikely, unless market conditions improve significantly. As a result, this option could result in significant delivery and financial risks for the Council.
4 – Provision of Town Deal grant funding to ARBA Group to enable the acquisition and redevelopment of the vacant Market Walk Shopping Centre	The Council could provide Town Deal funding to ARBA Group to enable the acquisition and redevelopment of the vacant Market Walk Shopping Centre to provide refurbished, high quality market floorspace and new F&B floorspace. This option would have transformational placemaking inputs on Abington Street and revitalise Northampton's High Street by increasing footfall and improving investor, occupier and visitor perceptions of the Northampton's retail core.
5 – Council acquisition of the vacant Market Walk Shopping Centre and marketing of the Centre to developers as a development opportunity	Under this option, the Council could use Town Deal funding to acquire the vacant Market Walk Shopping Centre and then take it to the market as a development opportunity. This option does not fully align with the Council's objectives as it would not fully address the issue of retail vacancies in Northampton, and particularly on Abington Street. This option is also likely to result in delivery risks as the evidenced viability challenges associated with the redevelopment of the shopping centre may result in a lack of developer interest in acquiring the site. As demonstrated in the Strategic and Commercial cases of the business case, delivery is unlikely to be achieved in this scenario as the evidenced viability challenges may preclude developers from pursuing development in this location. This option also increases the Council's financial risk exposure.
6 – Council acquisition, demolition/ site preparation and plot sale	Under this option, the Council could use Town Deal funding to acquire the vacant Market Walk Shopping Centre and undertake demolition and site preparation works, prior to selling the whole site to the market for development. This option is likely to result in delivery risks as the evidenced site viability challenges may preclude developers from development in this location even if the site was taken to the market as a cleared site. As demonstrated in the Strategic and Commercial cases of the business case, due to the risks associated with retail development it is also unlikely that there would be market appetite from other developers to bring a new build retail scheme forward in this location. This option would also result in increased planning risk as demolition of the vacant shopping centre may not be acceptable in planning terms. This option would also expose the Council to increased financial risks.
7 – Use another form of Council funding/financing to deliver the scheme in the absence of Town Deal funding	Under this option, the Council could consider using other forms of Council funding/financing (e.g. Public Works Loan Board borrowing or Council reserves) to fund the delivery of the scheme as proposed in the absence of Town Deal funding. This option would increase the Council's risk exposure and is unlikely to be affordable within the existing Council budgets.
8 – Use another form of public sector (e.g. LEP) funding to deliver the	Under this option, the Council could consider using other forms of public sector funding to fund the delivery of the scheme as proposed in the absence of Town Deal funding. This could include, for example, seeking LEP funding. This option is unlikely to result in full delivery of

Long List Option	Description and Likely Outcome
scheme in the absence of Town Deal funding	the scheme as proposed as there are not currently any identified LEP funding opportunities which are appropriate for the scheme.
9 – Use Town Deal grant funding to enable the Council led delivery of a residential led redevelopment scheme	Under this option, the Council could use Town Deal funding to acquire the site and deliver a residential-led conversion scheme. This option does not align with the Council's strategic objectives and is likely to result in delivery challenges associated with difficulties providing appropriate access to natural light for residential units in large floorplate building conversions. This option would also expose the Council to increased financial risks.

Longlist Option Appraisal Against Critical Success Factors

A number of Critical Success Factors (CSFs) have been identified as per the HMT Green Book and the long list options were appraised against these. CSFs are the attributes that any successful proposal must have if it is to achieve successful delivery of its objectives. The identified CSFs include:

- Strategic fit – against the scheme objectives and wider policy and strategy aims (e.g. delivery of a mixed use comprehensive scheme as per the planning allocation)
- Achievability – likelihood of deliverability based on resource and skills requirements
- Supplier capacity and capability – ability of potential delivery bodies to deliver the proposal
- Affordability – likely availability of funding and financing to deliver the proposals
- Potential value for money – ability to maximise social value against cost and risk

A RAG based scoring exercise for each long list option against these is presented below including an assessment based on this as to whether they have been taken through to the shortlisted options stage.

Longlisted options	Critical Success Factors					Taken forward to shortlist?
	Strategic fit	Achievability	Supplier capacity and capability	Affordability	Potential VFM	
1 – Do nothing/Business As Usual	Red	Red	n/a	Green	Red	Y – as per Green Book requirements
2 – Reduced provision of Town Deal grant funding to fund acquisition costs only	Red	Yellow	Yellow	Green	Red	N
3 – Provision of loan funding to ARBA Group to address the scheme viability challenges	Red	Yellow	Yellow	Green	Red	N
4 – Provision of Town Deal grant funding to ARBA Group to enable the acquisition and redevelopment of the vacant	Green	Green	Green	Green	Green	Y

Market Walk Shopping Centre						
5 – Council acquisition of the vacant Market Walk Shopping Centre and marketing of the Centre to developers as a development opportunity						N
6 – Council acquisition, demolition/ site preparation and plot sale						N
7 – Use another form of Council funding/financing to deliver the scheme in the absence of Town Deal funding						N
8 – Use another form of public sector (e.g. LEP) funding to deliver the scheme in the absence of Town Deal funding						N
9 – Use Town Deal grant funding to enable the Council led delivery of a residential led redevelopment scheme						N

Shortlisted Options

On the basis of the above, Option 4 scored the highest followed by Option 5 which is in effect a “do more option” requiring additional public funding support and risk exposure. A number of “do minimum”/”do less” lower intervention options were considered above but the analysis clearly identifies their lack of strategic fit and alignment to the objectives of the scheme and wider policy objectives. As per the Green Book, options which do not meet the scheme’s strategic objectives should not be taken through to the shortlisting stage.

As agreed, through a proportionate approach to the economic appraisal, the focus of the cost benefit analysis has very much been on the preferred option versus a no Town Deal/business as usual option to establish the net additional economic benefits of the preferred option primarily.

This results in the following long list options being shortlisted to full economic appraisal:

- Option 1 - Business As Usual** – No further investment by the Council/wider public sector. The redevelopment of Market Walk will remain stalled as the development will be unviable. As evidenced by the Financial Case of the business case, the viability challenge presented by the redevelopment of the vacant shopping centre is substantial and, in the absence of Town Deal funding, it is unlikely that ARBA Group will acquire the site due to a lack of viability. Moreover, there are no other currently available public sector funding sources to address the scheme viability gap. As such, it is unlikely that the vacant Market Walk Shopping Centre would be redeveloped under a ‘do nothing/ BAU scenario’. Under this scenario, Market Walk is likely to remain vacant as the decline in the retail market has made the shopping centre style of retail accommodation somewhat obsolete in this location and therefore the prospect of re-letting the currently vacant units is very limited. Any form of site redevelopment or building repurposing would be likely to have a viability challenge requiring public sector intervention of one sort or another. As demonstrated in the Strategic and Commercial cases of the business case, due to the risks associated with retail development it is also unlikely that there would be market appetite from other developers to bring a similar scheme forward in the absence of grant funding in a BAU scenario. The shopping centre is likely to become mothballed over the medium term in this scenario until a public sector funding opportunity arises to fund/finance a viable solution. In this scenario, it is likely that the public sector would need to intervene in the future to enable acquisition and redevelopment of the site.
- Option 4 - Preferred option** - The Council could provide Town Deal funding to ARBA Group to enable the acquisition and redevelopment of the vacant Market Walk Shopping Centre to provide refurbished, high quality market floorspace and new F&B floorspace. This option would have transformational placemaking inputs on Abington Street and revitalise Northampton’s High Street by increasing footfall and improving investor, occupier and visitor perceptions of the Northampton’s retail core.

Approach to Cost Benefit Analysis – Land Value Uplift Approach

As above, the approach taken to the cost benefit analysis is consistent with guidance within the 2016 MHCLG Appraisal Guide and the 2022 HMT Green Book. This focuses on Land Value Uplift (LVU) as the key measure of private benefit alongside labour supply benefits. Using LVU is considered an appropriate approach in accordance with the Green Book which states that “*any increase in land value as a result of a change in its use reflects the economic benefits of conversion to a more productive use. The value to society of a development can therefore be derived from the land value. This estimate should be adjusted for any change likely without the development, displacement from the original land use and wider effects of the resulting development, e.g. any change in amenity value, environmental or health outcomes*”. As a property focused scheme seeking investment from a national DLUHC administered funding programme, the LVU based approach is considered to be wholly relevant and applicable. Our focus is on the use of VOA published land value data to inform the LVU assessment, which is considered acceptable within the MHCLG Appraisal Guide (2016).

In addition to LVU, wider external economic benefits have been monetised including labour supply benefits associated with new entrants/re-entrants to the labour market linked to the delivery of the new commercial floorspace and economic activity that this will directly accommodate. As the scheme comprises the redevelopment of an existing building and no associated public realm/ amenity space provision is proposed, amenity benefits/ disbenefits have been excluded from this assessment. Health benefits associated with affordable housing provision have also not been monetised as the preferred option will provide 100% commercial floorspace.

Further details of each key monetised benefit stream are provided below:

- Land Value Uplift (LVU)** – Valuation Office Agency (VOA) 2019 Land Value data has been used (uplifted to 2022/23 base year values using GDP deflators), based on relevant Local Authority based area values. The VOA land values are based on clean sites with no

abnormal costs. As per the MHCLG Appraisal Guide, private sector contributions to abnormals should be reflected as a disbenefit in the BCR numerator as these are a disbenefit to the private sector. Public sector contributions towards abnormal costs are not reflected as a private benefit in the numerator of the BCR as these costs are not accounted for in the LVU estimate using the VOA data. All public sector economic costs are however accounted for in the BCR denominator. If, as per in this instance, all abnormals are being funded by the public sector, then on the basis of the below they can be left out of the numerator as a disbenefit (i.e. to be netted of the land value) if the public funding benefit to the private sector is also excluded (i.e. they effectively cancel one another out in the numerator) and the impact of the public sector cost is presented in the denominator.

This is predicated on the basis that the MHCLG Appraisal Guide states that *“if the appraisal is using illustrative Valuation Office Agency land value uplift data, then this data will only account for 'typical' development costs. It will not account for any 'atypical' costs - such as those where there are large 'clean-up' costs associated with brownfield land for example - or the benefits of government support. These impacts will need to be accounted for separately in the appraisal. These 'atypical' private costs should feature as a negative number in the present value benefits as they represent a dis-benefit to the private sector. Any government grant or subsidised loan (less repayments) to the private sector should feature as a positive number in the present value benefits and as a positive number in the present value costs”*.

Both direct and indirect land value uplift has been quantified within the economic appraisal model as follows:

- **Direct Land/ Property Value Uplift** – associated with the direct value uplift generated through the redevelopment of Market Walk Shopping Centre as it changes from being a derelict shopping centre to an economically productive market/F&B offer.
- **Indirect/spillover Land/ Property Value Uplift** – indirect land/ property value uplift to occupied retail/leisure properties on Abington Street in the area directly adjacent and opposite to the redeveloped Market Walk Shopping Centre. The area of impact quantified within the indirect Land/Property Value Uplift Assessment is shown on the plan below.

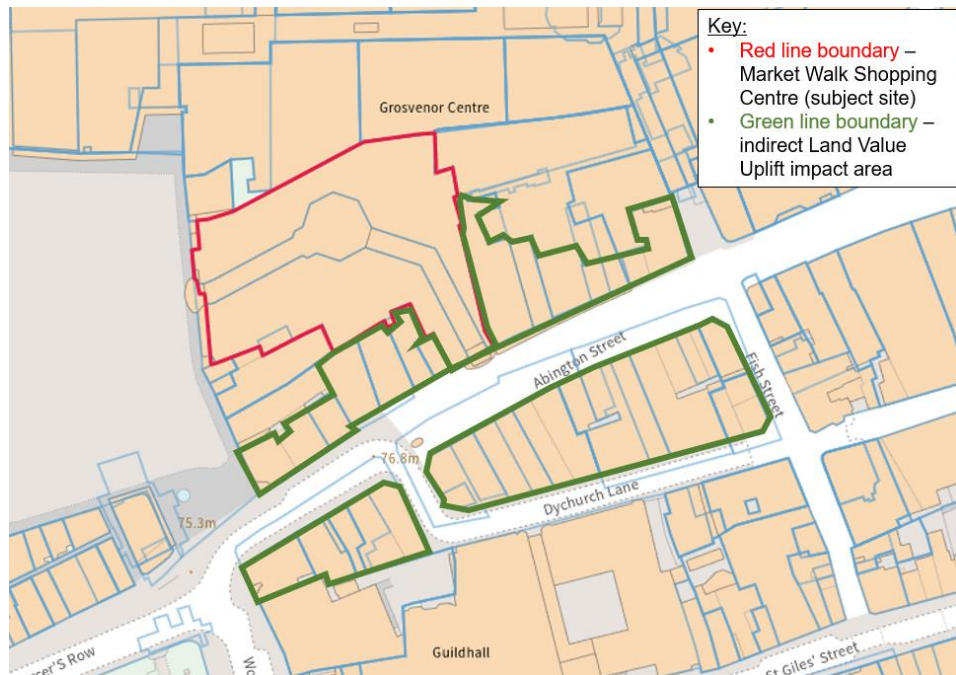


Figure 3.1 - Indirect Land/ Property Value Uplift Impact Area

The area of impact assumed for indirect or spillover commercial property value uplifts is considered to be appropriate and conservative as the delivery of a new market and F&B uses at Market Walk is likely to generate additional footfall on the wider Abington Street and in the rest of Northampton Town Centre. Prudently, a conservative approach has been adopted which limits the monetised indirect land/ property value uplifts to properties adjacent to and opposite the Market Walk Shopping Centre only. The delivery of a new market and F&B uses at Market Walk is likely to result in increased footfall, dwell time and spend and is assumed to therefore indirectly result in an uplift to commercial property values within the impact area (Figure 3.1). Markets and F&B uses can serve as major drivers of footfall within town centres and it is therefore a wholly logical link to make between the proposed scheme and associated uplifts in footfall/spend supporting wider local spend which in turn will drive revenues and impact on the value of existing surrounding commercial property as it becomes more attractive to occupiers.

- **Labour Supply Impacts** - In addition to the direct and indirect LVU above, Labour Supply Impacts have also been monetised. Labour supply impacts capture the tax revenues and associated social welfare benefits arising from additional people in the labour market working and can be included as per the HMT Green Book where there is a case for a scheme enabling new entrants/re-entrants to the labour market. The welfare change is said to be equal to the change in tax revenue and the benefit generally also accounts for the reduction in Government out of work subsidies such as Universal Credit, for example. This is a recognised Green Book principle that is firmly embedded within Unit 2.3 of the DfT's Transport Appraisal Guidance (TAG). The scheme is proposing the delivery of the new commercial (market and F&B) floorspace which it is assumed will provide opportunities for supporting new entrants/re-entrants to the labour market as explained further below.

Key CBA Model Assumptions

An assessment of the monetised economic benefits and costs has been undertaken in a bespoke MS Excel economic appraisal model prepared by C&W. The following key model assumptions have been applied:

- Model start date – 2022/23 financial year (this is the base year and all economic costs and values are presented in FY 2021/22 values).

- Discount rate – 3.5% pa based on the HMT Green Book Social Time Preference Rate (STPR) over years 1-30 of the appraisal period.
- Exclusion of general inflation on costs and values as per the HMT Green Book.
- 30-year appraisal period (costs and land values are profiled in the year in which they occur and the LVU benefit is only accounted for in the year in which it occurs)
- Inclusion of Optimism Bias (OB) on public sector costs as per the HMT Green Book in the Economic Case only. No OB on benefits applied.
- Benefit adjustment for displacement and deadweight as per the MHCLG Appraisal Guide
- High level switching value and sensitivity analysis has been undertaken.

Monetised Economic Benefits

Direct Land/ Property Value Uplift – Market Walk Shopping Centre

- Applied VOA Land Values from 'Land Value Estimates for Policy Appraisal' (2019).
- Assumed all land values as at FY 2019/2020 as per the guidance and uplifted to 2022/23 values using the GDP deflator equating to £194.84 per sq m for office (edge of CBD) land within the Northampton Local Authority area (now incorporated into the newly created West Northamptonshire Local Authority area). As the VOA data does not provide a specific retail/F&B land value, edge of CBD office land values have been adopted as a proxy as in value terms the uses are considered comparable.
- The above land values have been applied to the following accommodation schedule, as per the scheme designs provided by Urban Edge:
 - F&B Units – 1,593 sq. m. GIA
 - Market – 7,775 sq. m. GIA
 - **Total – 9,368 sq. m. GIA**
- This equates to the following post scheme gross undiscounted land values:
 - F&B Units – £0.310m
 - Market – £1.154m
 - **Total – £1.825m**
- A nil economic Existing Use Value (EUV) is proposed given the current status of the site as a vacant shopping centre with no current economic activity/productivity associated with this. It is acknowledged that the site has an acquisition value in property market terms. However, in economic productivity terms the Shopping Centre is vacant and current generates no productive economic activity and therefore has no existing economic use value. Market Walk Shopping Centre has been vacant for some time and given the decline in the retail market, the shopping centre has become obsolete and the prospects of reletting the units for shopping centre-based retail use is considered to be very minimal. As presented under the BAU scenario description the units will be likely to be mothballed in the absence of the Town Deal funding for the foreseeable future with no economic value attributable to them. This is therefore considered to be a justified economic EUV.
- This results in an undiscounted gross Land Value Uplift (LVU) of £1.825m.
- The land value uplift has been profiled in accordance with the scheme programme (practical completion anticipated in the 2024/25 financial year).

- Assuming this trajectory results in a PV gross discounted LVU of £1.703m (discounted at 3.5% per annum).
- A 20% displacement factor is applied to the land value uplift based on the MHCLG Appraisal Guide. This is a low level of displacement as per the Appraisal Guide and reflects the focus of the proposed scheme specialist commercial use proposed for the site (i.e. an indoor market) which is not provided elsewhere in the town centre. this use therefore offers a differentiated product locally and has a low propensity to displace other activity.
- 0% deadweight is applied as per the above BAU assumption that the scheme would not be delivered without Town Deal funding support given the presented viability case as per the Financial Case section of this business case.
- This results in a PV net additional LVU benefit of £1.363m.
- No private sector contributions to abnormal costs are applied as a private disbenefit to be taken off the post scheme residual land value as, as explained above it is assumed that all site abnormal costs are funded by the public sector.
- This results in a PV net additional LVU benefit of £1.363m.

Indirect (or “spillover”) Land/Property Value Uplift associated existing adjacent retail/leisure properties

- The current rateable value of all of the relevant retail/ leisure properties within the assumed impact area (Figure 3.1) was obtained from the Valuation Office Agency (VOA) on a property by property basis. The rateable value was applied as a proxy for rental value which is considered an acceptable approach to this (acknowledging the conservative nature of this in that rateable values tend to always be slightly lower than current market values due to the way in which rateable values are based on rateable values from April 2015). An assumed capitalisation yield of 9% (conservative estimate for high street retail property in Northampton Town Centre based on a C&W assumption) was then applied to the retail and F&B properties to derive an estimated current market capital value for each rateable hereditament. This equates to an overall capital value of £16.175m.
- An assumed 3% uplift in capital value per annum for these impacted properties was then assumed for a 5-year period on a compounded basis from the point at which the final element of the scheme is expected to reach practical completion (FY 2024/25). This percentage uplift is considered to be justified and in practice, the scale and duration of uplift could be more significant. The uplift is predicated on the basis of the market’s potential to act as a key driver of town centre footfall (markets typically play a key role in town centres in driving footfall) which in turn could result in additional footfall and spend within the surrounding area. This could therefore have a positive impact on wider property values as a result of increased retail/leisure turnover and higher levels of occupier demand.

Whilst the MHCLG Appraisal Guide does not specifically acknowledge the potential for indirect/spillover value uplifts, this principle is well accepted by DLUHC through recent funding programmes such as the Future High Street Programme and the current Levelling Up Fund. The clarification guidance that MHCLG provided in relation to the Future High Streets Fund permitted a 5% uplift for 5 years as an accepted area wide uplift to assume and there was an ability to increase this further in the MHCLG appraisal template. The MHCLG Appraisal Guide also suggests a 5% per annum uplift in relation to average annual real terms growth in land values as stated explicitly on page 62 of the 2016 MHCLG Appraisal Guide and whilst this is spillover uplift is not presented as an inflationary based increase, the 3% pa increase nonetheless sits well within this accepted parameter.

- Nil deadweight assumed as the scheme will not be delivered in the absence of Towns Fund investment due to a lack of sufficient available funding and the scale of the viability gap as presented in the Economic Case.
- A displacement rate of 20% which is a low level of displacement as per the MHCLG Appraisal Guide. In practice, we do not consider the value uplift here to have the potential to materially displace any existing values elsewhere.
- The post scheme land values have then been profiled in accordance with the scheme delivery programme (from FY 2024/25) and discounted back to 2022/23 values using a 3.5% annual discount rate. No private sector atypical costs are assumed.
- This results in PV net additional land/property uplift benefit of £1.795m.

Labour Supply Benefits

- Our approach to the quantification of the labour supply impacts is presented below and this aligns with the MHCLG approach to the monetisation of benefits for the Future High Street Fund as per its prescribed MS Excel template as well as the assumptions presented in the latest Green Book. As per the MHCLG guidance for the Future High Street Fund, the monetised labour supply benefits have been included within the initial BCR.
 - Gross FTEs based on the employment projections provided by ARBA Group:
 - Market – 140 gross FTE jobs
 - F&B units – 30 gross FTE jobs
 - Total - 170 gross FTE jobs
 - It has been assumed that 10% of the new gross FTE jobs will be taken by new/re-entrants to the labour market which equates to 17 FTE jobs. This % assumption is in accordance with the accepted parameters defined by MHCLG for the Future High Street Fund programme and is not considered unreasonable reflecting the type of jobs that would be created through the scheme (i.e. many entry level based jobs).
 - GVA per FTE data was applied to the 17 gross FTEs using ONS GVA data at the West Northamptonshire LA level. As West Northamptonshire is a newly created local authority, GVA figures for Daventry, Northampton and South Northamptonshire have been combined to enable an accurate comparison. SIC Group I Accommodation and Food Services Activities (based on ONS 2018 Regional GVA by Industry) has been applied.
 - The GVA figures by SIC Group were divided by the total employment by SIC Group based on BRES 2018 data and the GVA per FTE figures were uplifted to 2022/23 values using the GDP deflator. This resulted in the below GVA per FTE figures:
 - Market and F&B – £23,769 per FTE per annum
 - Applying this the 17 FTEs by use type resulted in a total GVA impact of £0.404m per annum from labour market entrants/re-entrants.
 - The assumed welfare impact was based on 40% of total GVA impact. As per TAG Unit 2.3, the welfare impacts over and above user benefits are assumed to be equivalent to the benefits to the exchequer. These are the tax revenues resulting from labour supply impacts and can be estimated as 40% of the resultant change in GDP/productivity. 40% of the above GVA figure is £0.161m pa and this has been modelled as the annual welfare impact

for a 10-year appraisal period from 2024/25 aligned to the floorspace delivery trajectory and discounted at 3.5% pa to 2022/23 present day values.

- This equates to a total PV benefit over 10 years of £1.25m.

Monetised Economic Benefit Summary – Land Value Uplift Approach

The below table summarises the monetised economic benefits of the scheme.

Summary of PV Economic Benefits	PV 2022/23 prices	
Net Additional PV Direct Land Value Uplift	£	1,363,005
Net Additional PV Indirect Land/Property Value Uplift	£	1,794,522
PV Labour Supply Impacts	£	1,254,850
Total	£	4,412,377

Economic Benefits Analysis Place-based Approach - Employment and Productivity Benefits

As described above, as an alternative approach (and not to be double counted with the above) the economic benefits of the scheme have also been assessed based on the place-based approach to economic benefits assessment as per the 2022 HMT Green Book. This analysis is focused on the employment and productivity benefits generated by the proposed scheme.

- Gross employment projections have been provided by scheme developers, ARBA Group and market operators, The Hold as follows. These are based upon job densities achieved at The Hold's existing markets in Newcastle and Seaburn. These have been adopted within the economic benefits assessment.
 - Market – 140 gross FTE jobs
 - F&B units – 30 gross FTE jobs
 - **Total - 170 gross FTE jobs**
- A number of additionality adjustments have been made to determine the net additional direct FTE jobs which could be supported by the completed scheme, as per HMT Green Book guidance and the HCA Additionality Guide 2014 as below:
 - **Leakage** – a 5% leakage rate has been assumed for the purposes of this appraisal, given the retail/ F&B focus of the direct jobs and corresponding lower propensity to attract inward commuting from outside of the West Northamptonshire local authority area. This represents a low leakage rate as per the HCA Additionality Guide reflecting the likelihood that *'the majority of the benefits of the new employment will go to people living within the target area'*.
 - **Displacement** – 40% has been adopted on the basis that the indoor market will provide a differentiated offer from the existing facilities in Northampton Town Centre and has limited propensity to displace employment activity from elsewhere in Northampton. However, we cannot rule out the prospects that a proportion of the jobs that are provided could be taken by people moving from other retail, hospitality or F&B jobs in the locality. We have therefore assumed a prudent 40% displacement rate which is defined as low to medium within the HCA Additionality Guide.
 - **Multiplier Impacts** – A composite (induced and indirect) multiplier of 1.295 has been adopted based on the average of the multiplier for recreation (1.38) and retailing (1.21) at a local area level as per the HCA Additionality Guide (2014). This was also benchmarked against the place based multipliers within the 2022 HMT Green Book and assuming a “tradable” direct employment category and “central” effect on employment sectors, this would also result in a combined 1.3 multiplier impact on tradable and non- tradable sectors and so is considered to fully consistent with this.

- The additionality adjustments result in total direct net additional local jobs of 125.5 FTEs.
- This has been applied to the GVA output per job value for SIC Group I Accommodation and Service Activities at a West Northamptonshire level (ONS) which equates to £21,846 (2019 value). This has been uplifted to 2022/23 values using the Government's GDP Deflator to derive a GVA output per job of £23,769.
- This has been applied to the net additional local jobs to calculate a total GVA output per annum of £2,982,711. This has then been profiled from the point of realisation (2024/25 FY), with a 5-year persistence of benefits period assumed as per established appraisal methodologies, to result in an overall undiscounted GVA output of £14.193m.
- The benefit has been discounted to a present value at the Social Time Preference Rate of 3.5%. This results in a PV net additional productivity benefit of £13.011m.

Monetised Economic Benefit Summary – Place Based Approach – Employment and Productivity Benefits

The below table summarises the monetised economic benefits of the scheme:

Summary of PV Economic Benefits	
Net Additional PV GVA impacts associated with proposed scheme	£ 13,011,685
Total	£ 13,011,685

Monetised Economic Costs

The monetised economic costs are based on the scheme financial costs adjusted as per the Green Book. The financial costs of the scheme relate only to the £4.175m of requested Towns Fund grant funding as there are no other public sector funding sources and all private sector costs are reflected in the LVU.

The following adjustments have been made to the financial costs to calculate the economic costs of the scheme:

- All costs and incomes are discounted at 3.5% pa based on the assumed expenditure and receipt profile with 2022/23 as the base year with no discounting applied in this year;
- Adjusted for Optimism Bias (OB) in accordance with the HMT Green Book and the OB Supplementary Guidance. 10% OB has been applied to the Towns Fund grant at this stage to reflect the stage of capital cost certainty that exists.

A summary of the monetised 'economic' costs is presented below. All sunk costs have been excluded in line with HMT Green Book guidance. No deflator has been applied to remove general inflation on the basis that the public sector costs are derived from a viability appraisal which does not exclude inflation on the costs and values. No opportunity cost is considered applicable.

	Economic Costs			Financial Costs		
	NPV @ 3.5% with OB	OB Adjustment	NPV @ 3.5%	TOTAL (no OB/undiscounted)	2022/23	2023/24
Towns Fund Grant	£4,437,198	10%	£4,033,816	£4,175,000	£0	£4,175,000
Affordable Housing Grant	£0	0%	£0	£0	£0	£0
Other Public Sector Grant	£0	10%	£0	£0	£0	£0
Private sector costs (not incl in LVU)	£0	10%	£0	£0	£0	£0
TOTAL	£4,437,198		£4,033,816	£4,175,000	£0	£4,175,000

Value for Money Summary – Appraisal Summary Table (AST)

The Appraisal Summary Tables for each of the economic appraisal approaches undertaken are presented below.

AST – Land Value Uplift plus External Benefits Approach

The scheme Appraisal Summary Table (AST) is presented below based on the Town Deal only and total public sector costs:

Appraisal Summary Table (AST)		
PV Economic Benefits	Towns Fund Cost Only	Total Public Sector Cost
Present Value of Benefits (for initial BCR)	£4,412,377	£4,412,377
Present Value of Other Monetised Impacts (for adjusted BCR)		£0
Total Present Value Benefits	£4,412,377	£4,412,377
PV Economic Costs		
Towns Fund cost (discounted, incl OB)	£4,437,198	£4,437,198
Other public sector costs (discounted, incl OB)	n/a as Towns Fund cost only	£0
Total Public Sector Cost	£4,437,198	£4,437,198
Private sector costs (not incl in LVU)	£0	£0
Initial BCR	1.0	1.0
Adjusted BCR	1.0	1.0
Initial NPSV	-£24,821	-£24,821
Adjusted NPSV	-£24,821	-£24,821

The above appraisal summary table shows that the development generates an initial and adjusted BCR of 1.0 on a total public sector and Towns Fund only basis. This means that the project has the potential to result in a marginally 'acceptable' value for money position as per the MHCLG Appraisal Guide and HMT Green Book given the BCR is 1 (a BCR of between 1 and 2 is defined as acceptable). The Net Present Social Value is marginally negative which reflects the fact that the economic costs are actually circa £25,000 higher than the economic benefits but the BCR is rounded to 1 decimal place and so can be presented as being marginally acceptable as a result as long as this is understood. Clearly there is a risk with any changes to schemes costs/benefits, the BCR could fall below 1 (see below).

AST – Place-based (Employment and Productivity Benefits) Approach

The scheme Appraisal Summary Table (AST) is presented below based on the Town Deal only and total public sector costs:

Appraisal Summary Table (AST)		
PV Economic Benefits	Town Deal Cost Only	Total Public Sector Cost
Present Value of Benefits (for initial BCR)	£13,011,685	£13,011,685
Present Value of Other Monetised Impacts (for adjusted BCR)	£0	£0
Total Present Value Benefits	£13,011,685	£13,011,685
PV Economic Costs		
Town Deal cost (discounted, incl OB)	£4,437,198	£4,437,198
Other public sector costs (discounted, incl OB)	n/a as Town Deal cost only	£0
Total Public Sector Cost	£4,437,198	£4,437,198
Private sector costs (not incl in LVU)	£0	£0
Initial BCR	2.9	2.9
Adjusted BCR	2.9	2.9
Initial NPSV	£8,574,487	£8,574,487
Adjusted NPSV	£8,574,487	£8,574,487

The above Appraisal Summary Table shows that; when assess on a place-based (employment and productivity) basis, the proposed scheme has the potential to generate an initial and adjusted BCR of 2.9 on both a Town Deal cost only and total public sector cost basis. This means that the project has

the potential to generate 'high' value for money when assessed on a place-based approach basis, as per the MHCLG Appraisal Guide (as it exceeds 2) from both a Town Deal only and total public sector cost perspective. Under both scenarios, an initial and adjusted Net Present Social Value of £8.575m is generated.

This does not account for wider scheme outcomes and non-monetised benefits which are presented below aligned to the strategic objectives of the project.

This shows that the initial and adjusted BCR has the potential to reach a “marginally acceptable” level under the Land Value Uplift plus external benefits approach to benefit monetisation, and a ‘high’ level under the place-based approach, based on the assumptions applied above.

Sensitivity Analysis and Switching Value Analysis

The Sensitivity and Switching Value Analyses for each of the economic appraisal approaches undertaken are presented below.

Land Value Uplift Approach

Sensitivity and switching value analysis has been undertaken as per the Green Book, to understand the impacts on the BCR of changes to key variables/inputs as a further test of the VFM position.

Switching Values and impact on BCR	
Percentage increase in PV economic costs for BCR to fall to below 1	0% - on the basis that the BCR is already exactly 1.0
Percentage decrease in PV economic benefits for BCR to fall to below 1	0% - on the basis that the BCR is already exactly 1.0

This demonstrates that there is no headroom for any negative changes to costs/benefits for the BCR to remain at 1.0. Further scenario testing has also been undertaken to test the impacts of variations in key assumptions upon the value for money position of the project.

Scenario Testing	Impact on BCR
Increase in displacement from 20% to 30%	0.9 (based on reduced PV economic benefits of £4.017m)
Increase in Optimism Bias to 20%	0.9 (based on increased PV economic costs of £4.841m)

This shows that the BCR would fall to 0.9 under either of the above scenarios.

Place Based (Employment and Productivity benefits) Approach

Sensitivity and switching value analysis has been undertaken as per the Green Book, to understand the impacts on the BCR of changes to key variables/inputs as a further test of the VFM position. The table below clearly identifies that a significant increase in PV costs or reduction in PV benefits is required for the BCR to fall below 1.

Switching Values and impact on BCR	
Percentage increase in PV economic costs for BCR to fall to below 1	194%
Percentage decrease in PV economic benefits for BCR to fall to below 1	66%

Further scenario testing has also been undertaken to test the impacts of variations in key assumptions upon the value for money position of the project. This illustrates that the BCR remains significantly over 1 under both scenarios.

Scenario Testing	Impact on BCR
Increase in displacement from 40% to 60%	1.96 (based on reduced PV economic benefits of £8.674m)
Increase in Optimism Bias to 20%	2.69 (based on increased PV economic costs of £4.841m)

Wider Non-Monetised Economic Benefits

There are several wider benefits of the scheme that have not been monetised within the above analysis. These are summarised below:

- Regeneration benefits – the scale and nature of the scheme will provide transformative regeneration benefits and could have a wider catalytic impact upon Abington Street and Northampton's Town Centre beyond the area of impact assumed from a wider value uplift perspective, by increasing investor and occupier confidence in the area. This could assist, for example, to enhance the town's attractiveness as a residential location to improve demand for town centre living which is a wider key objective of the Town Deal.
- Construction jobs – although the construction jobs which will be generated by the new development have not been quantified in detail as part of this Economic Case, the development will generate a significant number of new construction jobs during the construction period. It is estimated that it could support a total of c.113 construction job years (or c. 11 FTE jobs based on 1 FTE per 10 construction job years) through the construction period based on the estimated construction costs of c.£8.139m as per the HCA Calculating Cost Per Job Best Practice Note 2015.
- Perception and profile benefits – it could assist to enhance the perception, image and profile of the wider town centre offer through the delivery of such a significant scheme to transform the current offer.
- Reduced crime/anti-social behaviour – through promoting increased activity within a currently derelict shopping centre, including a day and evening offer, this could assist to improve natural surveillance levels and reduce opportunities for crime locally.

Economic Case Summary and Rationale for Selection of Preferred Option

In summary, the above Economic Case demonstrates that the preferred option could achieve a marginally 'acceptable' value for money position with a BCR of exactly 1.0 when appraised using the Land Value Uplift plus wider external benefits approach.

However, when assessed using the place-based approach, the preferred option has the potential to generate a 'high' value for money position with a BCR of 2.9.

The preferred option fully aligns with the scheme's SMART objectives and whilst the LVU based BCR is only marginally acceptable (and the risks of this falling below 1 must be acknowledged), the strategic rationale for intervention and the above wider non-monetised benefits should be accounted for in the overall assessment of the value for money of the preferred option as accepted and recommended in the latest version of the Green Book. The place based BCR also gives some comfort of the VFM position given the risks around the LVU based BCR falling below subject to changes to scheme costs/benefits. In our view, either approach to benefits monetisation could be justified in this instance and we have presented both scenarios to allow the appraiser to understand the BCR implications of each. Ultimately, it would seem logical to argue that the place based approach is relevant to a Towns Fund scheme of this nature.

4. Financial Case

Introduction

This Financial Case is intended to outline the affordability and funding of the preferred option along with identifying key project risks. It includes an analysis of all capital and revenue costs/incomes to demonstrate the financial deliverability and sustainability of the preferred option scheme.

Value Assumptions

Proposed Scheme

We have been provided with scheme designs undertaken by Urban Edge Architects, which comprise the redevelopment / repurposing of the Market Walk Shopping Centre, to provide a large, open market-style space to be operated by The Hold, as well as three supporting F&B units. An accommodation schedule is included below, with Gross Internal Areas, to which we have applied gross/net ratios of 70% for the Hold element and 80% for the three F&B units.

Unit	Gross Area	Net Area	Gross / Net Ratio
The Hold Unit	83,689 sq. ft.	58,583 sq. ft.	70%
Unit A	5,856 sq. ft.	4,684 sq. ft.	80%
Unit B	7,707 sq. ft.	6,166 sq. ft.	80%
Unit C	3,584 sq. ft.	2,868 sq. ft.	80%

The Hold Unit

For the Hold unit, which makes up the majority of the proposed scheme, we understand that an agreement has been reached for The Hold to take a lease with an annual rent of £250,000, and a 12 month initial rent free period.

This rental income has been capitalised at an all risks yield of 10.00%, which reflects the covenant strength of The Hold as an occupier / operator, as well as the transient and start-up nature of the prospective stall operators, and the overall risk of delivering the concept in an unproven and challenged market.

Purchasers costs have been deducted at the prevailing rate of 6.80%, realising a net development value for this element of the scheme of circa £2.1m.

F&B Units

We have made the following assumptions regarding annual rent and rent free incentives for the three F&B units, having regard to local and regional agency sentiment, as well as comparable evidence.

Unit	Gross Area	Net Area (80% of Gross)	Assumed Rental Value	Rent (per sq. ft.)	Rent Free Incentive
Unit A	5,856 sq. ft.	4,684 sq. ft.	£85,000 p.a.	£18.15	12 months
Unit B	7,707 sq. ft.	6,166 sq. ft.	£100,000 p.a.	£16.22	12 months
Unit C	3,584 sq. ft.	2,868 sq. ft.	£55,000 p.a.	£19.18	12 months

There is a real lack of F&B comparable evidence in Northampton, and we have therefore, had regard to evidence from the wider region, as well as placing a greater weight on local property agency sentiment.

We are aware of a recent letting to Pizza Express at the new Castle Quay scheme in Banbury, which achieved an annual rent of c. £92,500 for a 15 year lease (tenant break after 11 years). The unit was delivered as a shell, comprising 3,400 sq. ft. and the letting involved a £500,000 capital contribution. Whilst this letting reflects a headline rent of approximately £27 per sq. ft., Banbury is considered to be a much superior location to Northampton and the subject site, and the rental values in the table above are therefore at a significant discount to this on a £ per sq. ft. basis.

We are also aware of a letting to Dough & Co, at 2 Mulberry Place, Daventry. The unit let in February 2022, for a term of 15 years. The unit comprised c. 3,000 sq. ft. with the annual rent of £45,000 reflecting around £15 per sq. ft. The location and proposed units at the subject site are considered to be superior to this unit and therefore, the assumed rental values are at a premium to this evidence.

More commonly in the current retail and F&B market, rental values are having regard to “economic rents”, and are being assessed in the market more and more so on the affordability of the total rental value, as opposed to a £ per sq. ft. basis. Based on agency sentiment, we are of the view that the largest of the three F&B units could achieve a rent of no more than £100,000 per annum, with this essentially reflecting a ceiling for total rental values in Northampton. The other two units are smaller, and therefore, accounting for quantum, we would envisage slightly higher rents on a £ per sq. ft. basis being achievable, up to c. £19 per sq. ft.

Based on the assumption of the units being let to regional / national F&B occupiers, an all risks yield of 9.00% has been applied to this assumed rental income, reflective of market sentiment, C&W’s property investment yields tracker, and the challenges associated with the retail / F&B sector in regional markets.

Again, purchasers’ costs have been deducted at the prevailing rate of 6.80%, realising a net development value for this element of the scheme of circa £2.3m.

Development Timescales

We have included the following development timescales within our appraisal, which have been informed by indicative timescales provided by ARBA Group, and are considered reasonable:

- Acquisition date of May 2023
- Start on site in July 2023, with a 9 month building conversion period
- Following this, a 7 month period has been assumed for fitting out the Hold element, completing in October 2024
- We have assumed that the value of The Hold element would be realised following this, with an assumed 12 month rent free incentive
- For the three F&B units, we have assumed that one of these units would be pre-let, and thus, the value realised at practical completion of the Hold fit out
- We have allowed for staggered lettings for the remaining two F&B units, 6 and 12 months after practical completion

Capital Costs

Construction Costs

In undertaking an appraisal of the preferred option, we have had regard to an Order of Cost Estimate (OCE) undertaken by Turner & Townsend on behalf of ARBA Group, which is summarised below, and included at Appendix B. This OCE covers the building adaptation costs, on the basis of a shell and core fit out.

Item	Cost
Superstructure – Roof	£600,000
Superstructure – Stairs and Ramps	£150,000
Superstructure – External Walls	£300,000
Superstructure – Internal Walls and Partitions	£100,000
Services – Sanitary Installations	£40,000
Services - MEP Generally	£400,000
Minor Demolition Works and Alteration Works	£700,000
External Drainage	£150,000
Facilitating and Building Works Total	£2,440,000
Main Contractor Preliminaries	£244,000
Main Contractors Overheads and Profit	£161,040
Total – Building Works Estimate	£2,845,040

We have also been provided with an estimated fit out contribution of £750,000 for the Hold element.

For the three F&B units, having regard to current retail agency sentiment and the level of contribution that is required to achieve the rental values included above, we have made the following fit out contribution assumptions, on the basis that the units will be delivered on a shell and core basis, at best. The below allowances range between £250,000 and £500,000 depending on size, and reflect circa £65 - £70 per sq. ft.

- Unit 1 (5,856 sq. ft. GIA) - £400,000 (£68 per sq. ft.)
- Unit 2 (7,707 sq. ft. GIA) - £500,000 (£65 per sq. ft.)
- Unit 3 (3,584 sq. ft. GIA) - £250,000 (70 per sq. ft.)

Other Site Costs

An allowance of £2m has been included for the acquisition of the Market Walk Shopping Centre, which has been informed by the agreed Heads of Terms between the Vendor and ARBA Developments Limited. Appropriate allowances for Stamp Duty Land Tax, agency fees and legal fees have been made.

Contingency & Professional Fees

It is noted that whilst the OCE includes a 5.00% Contingency allowance, applied to the Building Works Estimate total above (£2,845,040), the OCE explicitly excludes allowances for asbestos removal, diversion of existing services, removal of contaminated material and several other items, for which an appropriate contingency allowance must be applied. We have therefore, applied a replacement Contingency allowance of 10.00% within our appraisal of the site, which reflects the scheme being at a relatively early stage of scheme design, which typically carries a greater level of risk and uncertainty when estimating costs. This level of contingency also allows for the possibility of the presence of deleterious materials, such as asbestos. Contingency has been applied to the Building Works Estimate and the fit out contribution for The Hold, as this forms a key component of the proposed scheme and is effectively pre-let. In terms of overall cost, this allowance reflects circa £360,000, which is considered reasonable given the nature of the scheme.

We have also included an allowance for Professional Fees at 10.00% within our appraisal of the site, which is an industry standard assumption and has again been applied to the Building Works Estimate and the fit out contribution for The Hold.

Letting, Marketing and Disposal Costs

We have allowed for letting agency and letting legal fees of 10.00% and 5.00% respectively, consistent with commercial schemes of this nature. Letting agency fees have been applied to the three F&B units only, given that The Hold operation is effectively pre-let and forms part of the overall scheme proposal. Letting legal fees have been applied across the board.

We have included scheme marketing costs at 1.00% of Gross Development Value, as well as sales agent fees at 1.00% of GDV, and sales legal fees at 0.50% of GDV.

Finance Costs

We have included a rate of 6.50% as the cost of finance within the appraisal.

Developer Profit & Appraisal Summary

Based on the value, timescales and cost assumptions set out above, we have undertaken a development appraisal of the proposed scheme, which is included at Appendix A of this report, and the outputs for which are summarised below.

On the basis that the acquisition cost has been fixed, developer profit is the output of the development appraisal, for which the amount of Towns Fund gap funding is a variable. Typically, for commercial schemes of this nature, particularly in the retail sector, we would expect a developer profit allowance of around 20% on cost, reflective of current retail market conditions and the risks associated with securing occupiers for the scheme.

In order to realise a level of profit in this region, and thus for the scheme to be commercially viable, Towns Fund gap funding of £4.175m is required, assuming that this is apportioned on the following basis:

- £2.1m on “Day 1” of the appraisal, assumed to be on a “back to back” basis with the acquisition cost of £2m and associated allowances for SDLT and fees.
- £2.075m assumed to be drawn down monthly in arrears and evenly apportioned over the first 8 months of the “building adaptation” phase.

Making these assumptions regarding the gap funding requirement, a developer profit allowance of £731,742 is realised, which reflects approximately 9.33% on total scheme cost (£7,841,562), and 15.50% on GDV (£4,398,304).

However, on the basis that the Towns Fund funding will effectively offset and be linked to around £4.175m of development cost (as above), with no real risk to the developer for such cost elements, we have considered this profit allowance in the context of the scheme costs that the developer will be responsible for (£3,666,562). Against this level of development cost, the profit allowance reflects approximately 20%, which is considered reasonable and justifies the level of Towns Fund funding required in order for the scheme to be viable and deliverable.

Project Costs

We have presented below an annual profile of the total project costs.

	23/24	24/25	25/26
Total Project Costs	£5,558,241	£1,470,551	£812,750

*excludes developer profit

Funding Profile

It is proposed that the Market Walk development will be funded through a combination of Towns Fund funding and private commercial/developer equity funding.

Public Sector Funding

Based on the appraisal undertaken by Cushman & Wakefield, a Towns Fund gap funding requirement in the order of £4.175m has been identified.

The table below sets out the anticipated public sector funding profile, for the £4.175m of Towns Fund funding, which assumes:

- £2.1m in May 2023 (2023/24 FY), assumed to be on a “back to back” basis with the acquisition cost of £2m and associated allowances for SDLT and fees
- £2.075m assumed to be drawn down monthly in arrears and evenly apportioned over the first 8 months of the “building adaptation” phase, between August 2023 and March 2024 (2023/24 FY)

Total (no OB / undiscounted)	2023/24
£4,175,000	£4,175,00

These timescales are based on the current anticipated programme for scheme delivery, as referred to in the Development Timescales sub-section above.

Commercial Funding

Funding Source, Certainty and Affordability

As set out above, the viability gap for the scheme is proposed to be funded through Towns Fund funding.

Aside from the public sector gap funding, which is required as a result of the negative viability position of the scheme, delivery of the scheme will be funded through commercial funding sources, for which allowances have been made in our development appraisal for the scheme.

Need for Public Sector Intervention – Project Viability

Based on the development appraisal undertaken, a viability gap of circa £4.175m has been established, and therefore, the proposed scheme is considered unviable without gap funding contributions from the public sector.

Contingency and Cost Overruns

We have included an allowance for contingency of 10.00% (amounting to circa £360,000) within our appraisal of the scheme, to reflect the scheme being at a relatively early stage of design, which typically carries a greater level of risk and uncertainty when estimating costs. This level of contingency also allows for the possibility of the presence of deleterious materials, such as asbestos.

Key Financial Risks

- Risk of increased conversion costs due to changes in scheme design, given the relatively early stage of design that the scheme is currently at. It is noted that we have made a contingency allowance in our appraisal which partially reflects this.
- It should be noted that the current costs in the development appraisal purely relate to present day costs, with inflation having been excluded from our appraisal of the site, treating the appraisal on a “today's costs and today's values” basis. Whilst a case could be made for including inflation on the costs, similarly a case could be made for also inflating the appraisal values (in terms of rents and capital values) and if both were inflated by the same amount the net impact is nil. When preparing development appraisals we would typically always present both costs and values in current days prices for consistency as otherwise this relies on cost and value forecasts over which there could be uncertainties beyond the short term.
- Risk of poor demand for the F&B units, albeit we have assumed a staggered letting profile and have allowed for significant capital contributions and incentives within our appraisal of the scheme.
- Risk of increased abnormal costs as a result of the safe removal of asbestos or other deleterious materials being required.
- Risk of securing commercial funding for the scheme, albeit that we have made allowances for an appropriate finance cost within our appraisal of the site, and the inclusion of public sector funding mitigates the amount of private funding required, thus de-risking this element.
- On the basis that Heads of Terms have been agreed between the vendor and ARBA Developments Limited, we don't anticipate increases to the acquisition cost as a major risk.

Financial Case Summary

The Financial Case has set out in detail the various revenue and cost assumptions which support the development appraisal undertaken for the Market Walk site.

Based on the appraisal undertaken by Cushman & Wakefield, a viability gap in the order of £4.175m has been identified, which is proposed to be met through Towns Fund funding.

Aside from the public sector gap funding outlined above, which is required as a result of the negative viability position of the scheme, we have assumed and are confident that the delivery of the scheme would be funded through commercial funding sources.

5. Commercial Case

Introduction

This Commercial Case will assess the commercial viability of the proposed scheme, including comment and analysis on market demand, indicative milestones and timescales, key commercial dependencies, and an overview of the proposed procurement / delivery strategy.

Market Analysis/Demand and Commercial Viability/Sustainability

The Hold Group are responsible for delivering Stack Newcastle and Stack Seaburn, two highly successful leisure/hospitality and entertainment venues that have continued to perform strongly throughout the past few years even through the pandemic, bucking the trend in leisure & hospitality. Due to the success of these two sites, The Hold Group are looking to expand into other areas of the country and provide a solution to landlords and local authorities that will reinvigorate the high street and provide an exciting and commercially safe prospect for the repurposing of retail units.

Whilst Northampton's retail and leisure sector has suffered due to the compounding effects of Rushen Lakes, the Covid pandemic and the shift to online shopping, there is a huge opportunity to reimagine the role that leisure/hospitality plays in creating a new town centre anchor by transforming the currently vacant Market Walk Shopping Centre.

The repurposed Shopping Centre will create a prime destination in Northampton for food, drink and entertainment which will attract local residents and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing Market Square as a prime events space.

Market / Demographic Analysis

Northampton's current leisure and F&B offer is substantial with 119 F&B businesses located within the town centre (source Northampton Town Centre BID Directory). There is a mix of independent operators, national chains, and multi-site operators, which all offer a more traditional dining/drinking experience. There are also several venues offering live music from local bands to touring bands, but again these venues are more traditional, hosting ticketed performances and with limited food provision.

Through research, it is evident that the F&B offer in Northampton has declined and that a more modern offer is available outside of the town at Rushden Lakes which is home to many mid-range and well known high street occupiers including Nandos, Patisserie Valerie, Pizza Express and Zizzi. This middle market is being squeezed with wealthier customers looking for something different, and lower income households tightening their purse strings. The Hold model bucks this trend as it appeals to a more inclusive customer base due to the value, experience, atmosphere and quality that is provided. It provides a strategic destination offer characterised by independent traders and competitive socialising. The evidence provided by the company demonstrates that at its existing establishments it has significant beneficial trickle down impacts on other traders in the locality and has a draw from a wide catchment, bringing a new demographic into the town centre.

There is no business currently operating in Northampton or in the wider County that offers a multipurpose venue with independent street food traders, bars, and entertainment, demonstrating there is a gap in the market for this type of offer.

Existing pop up events and festivals provide evidence that there is an appetite for this type of experience. Bite Street is currently Northampton's most popular pop-up street food event, which splits its time between two venues - the County Cricket Ground in Abingdon and Franklin's Gardens, home of Northampton Saints RFC.

Northamptonshire's Good Food and Drink festival is also returning for its third year with over 40 vendors, which indicates there is a market for street food traders and a pool of quality operators who will be suitable to occupy the units within the proposed scheme.

Transforming the Market Walk Shopping Centre into a food, drink and entertainment venue would provide a year-round, all-day offering of street food and a festival atmosphere that would appeal to a range of demographics. Notwithstanding this, the primary target audience would be the 25 – 45 age bracket, as they are the market with the most disposable income and prioritise spending their money and time on experiences.

Northampton has a population of 230,000 and a total catchment of 753,000 within the County, which is predicted to increase by 16.6% by 2043 (Northamptonshire Demography Insight Pack 2020).

40% of Northamptonshire's population are aged between 20 – 49 (317,356).

Research would suggest that this demographic do not have a huge amount of choice within the town centre that would meet their needs for good quality casual dining and social experiences. There is clearly an appetite for a more experiential leisure offer which can be evidenced by the number one venue on Trip Advisor – recently opened 'Playhouse' (formerly Revolution Bar), which offers gaming activities including arcade games, a racetrack and music bingo themed nights alongside pizza and cocktails.

The Hold venue would complement this offer in the town and provide more competitive socializing activities such as 'mini golf, darts, shuffleboard, karaoke booths and ten pin bowling. The Hold have demonstrated that at their existing venues, which attract a wide demographic by age.

The Hold venue would offer residents of Northampton a unique and exciting venue which would stop leakage to neighbouring places such as Milton Keynes and London which is only one hour away and home to a plethora of innovative venues.

Track Record – The Hold Group (Operator)

The Hold Group have a proven track record in delivering successful leisure schemes of this nature which include Stack Newcastle and Stack Seaburn.

Although both schemes are built using containers and are not repurposed retail units, the concept remains the same.

Both schemes have been a catalyst in regeneration for their respective areas increasing footfall and sparking further investment in the locations.

Stack Newcastle was located on a derelict piece of land in an area of the city that had been neglected for 15 – 20 years. Following the arrival of Stack the area saw a huge uplift in footfall and it changed the flow of people on a night out in the city. Stack was so successful at Pilgrim Street, the area is being transformed into Grade A office accommodation for HMRC and Stack is being relocated to a permanent location just down the street. The new home for Stack Newcastle is a repurposing of Grade II Worswick Chambers and will be at the heart of the Pilgrim Quarter development.

During the 4 years Stack Newcastle operated from August 2018 – May 2022 the site welcomed over 3 million visitors despite being closed for several months during lockdown. In the year April 2021 – May 2022 Stack Newcastle turned over just short of £9m net of VAT including rents received from tenants.

Stack Seaburn has been another success story invigorating Sunderland's seafront and attracting major investment into the area including a new hotel, housing development site and a number of new bars

and restaurants. Survey data showed that 96% of respondents were more likely to visit the area because of Stack.

Stack Seaburn opened during the pandemic in September 2020 and reached its one millionth visitor in May 2022, had it not been for Government-imposed lockdowns they believe they would have hit this figure within by the first year of opening. In the year April 2021 – May 2022 Stack Seaburn turned over £5.5m net of VAT including rents received from tenants.

Both venues have also demonstrated their power to pull in customers from a wider catchment area. This has had a significantly positive impact in Sunderland – it has reduced leakage to Newcastle (yet this never affected Newcastle’s customer base) and it is attracting people from the wider region to visit Sunderland including Teeside, Durham, Stockton and Middlesbrough, areas that previously people weren’t visiting from – see below maps:



STACK NEWCASTLE 2019



STACK NEWCASTLE 2021



STACK NEWCASTLE 2022



STACK SEABURN 2021



STACK SEABURN 2022



Financial Projections – The Hold Group (Operator)

The financial projections for The Hold at Market Walk are circa £10m per annum in turnover.

This figure accounts for £7m generated from the bars, tenant rents, retros, screen advertising/ sponsorship income and owned and operated food units, including a coffee shop. An additional £3m is forecasted for the competitive socialising gaming areas.

The assumption for this forecast is based on experience at other venues, the number of food units being let, market demand and low competition, along with the investment that is being put into the town centre.

Capacity / Track Record of Developer – ARBA Group

ARBA Group is a real estate developer, investor and property manager focused primarily on commercial real estate in England. ARBA Group was established by four individuals with a sector wide background of experience in the acquisition, refurbishment, delivery and management of real estate, and prides itself on thinking outside the box to repurpose, reimagine or simply update property making it fit for purpose in the current economic climate. With the combined skills of two chartered surveyor Directors, an archaically trained Director with a planning background, and a construction Director, ARBA Group is well placed to utilise this experience on projects that aren't always traditional development opportunities.

ARBA Group retains a portfolio of office accommodation, retail units and leisure properties with a few residential units. ARBA is also active in the transactional market and keeps a close overview of the property investment market, including key drivers and trends. ARBA Group has access to internal private equity investment funding, along with external syndicated equity funding and traditional bank funding, being well positioned for current and future projects.

ARBA Group is closely linked with Tanbry Construction, a £15m turnover contractor and construction company that undertakes various construction projects across the UK, most pertinently including structural work on shopping centres. Tanbry have been appointed on works including lift pits, escalator pits, structural openings and lift shafts in both shopping centres and stores. This is specialist work in tightly controlled health and safety environments, often with restricted access and controlled working periods. ARBA Group has a variety of trusted professional partners that work together on various projects.

Examples of projects successfully delivered by ARBA Group include:

Meadowhall Business Park, Sheffield

Acquired by ARBA Group from Sheffield City Council, the property comprises four two storey office blocks and a three storey central office block on the east of Sheffield, close to the M1. Sheffield City Council vacated the property, leaving almost 80,000 sq. ft. of vacant accommodation in dated condition. ARBA Group refurbished the accommodation, repurposing parts by removing the structural bridge links between the buildings, installing new internal amenity facilities, and rebranding the accommodation using cladding and creating improved parking provision. After a short period of ownership, new lettings were achieved over a period of two years and at a cost of c. £4.5m, the entire site had been refurbished and relet to high quality tenants, including Tata Steel, Preventex and Capgemini.

Former Bus Station – Mansfield

ARBA Group successfully developed a former bus station that was temporarily in use as a surface car park. The completed development included a leisure restaurant destination with Taco Bell, Tim Hortons and Dominos as occupiers. ARBA Group were appointed as preferred developer by Mansfield Council to deliver the scheme, for which ARBA Group successfully obtained planning permission for. Supported by Nottinghamshire County Council and D2N2 Business Investment Fund, the scheme attracted a significant financial grant to assist with the viability of the project. The scheme is open and trading well after construction work commenced during the pandemic in summer 2021. A letter of reference for ARBA Group from Mansfield Council can be made available if required.

Procurement & Delivery Options

On the basis that this scheme would be delivered by ARBA Group, who have approached the Council directly with this proposal, a typical procurement process is not required.

It is anticipated that the scheme will be delivered through a form of Development Agreement and Grant Funding Agreement between the developer (ARBA Group) and WNC, with the latter effectively acting as the accountable body for defrayment of the Towns Fund grant.

This process will still demonstrate value for money, through basing the Development Agreement, Grant Funding Agreement and this Towns Fund funding application on robust and market facing commercial inputs in the development appraisal. It is suggested that as part of such agreements, the developer should provide an independent report by an external RICS qualified surveyor to confirm the validity of the tendered costs and development appraisal inputs to demonstrate that they are commensurate with market rates prior to any grant drawdown. The Council have also taken subsidy control advice relating to the proposed scheme which is included below within this Commercial Case.

It is also the case that this is an advantageous position with regards to procurement and delivery of the site, as a developer in the market with a robust track record and proposal has effectively approached the Council, as opposed to the Council having to take the lead and acquire the property at risk, and then run a procurement process at risk. This alternative process would have significant impacts on timescale and costs, and may still not be successful with regards to maximising developer appetite and identifying a preferred development partner to deliver the scheme.

Indicative Contractual Milestones and Risk Transfer

Included below are indicative timescales and milestones for the procurement and delivery of the Market Walk scheme.

Project Milestone	Indicative Date
Planning Application Submitted	November 2022
Detailed Design and Procurement of Contractor	November 2022 – April 2023
Planning Approval	May 2023
Completion of Purchase of Market Walk Centre	May 2023
Start on Site & Building Adaptation Works	July 2023
The Hold Fit Out	April 2024 - October 2024
The Hold Commence Trading	October - December 2024

Asset Ownership

Market Walk Shopping Centre is currently in third party private ownership, and has been earmarked for acquisition in early 2023, for which Heads of Terms have been agreed between the parties, subject to conditions.

Subsidy Control Compliance

With regards to subsidy control compliance, WNC have sought advice from DWF Law LLP. Please refer to the Advice Note included at Appendix C, for further detail and information.

Key Commercial Dependencies

The following commercial dependencies are relevant:

- Market Walk Shopping Centre is currently in third party ownership, and needs to be acquired in order to ensure the comprehensive redevelopment of the site. HoTs have been agreed between ARBA Developments Limited and the vendor for the acquisition of the Property.
- Planning permission must be secured before redevelopment works can start and for completion of the acquisition of the Property.
- Private Sector and Public Sector Funding must be secured before development can start.
- Development Finance must be drawn down before development can start.
- Occupier Demand – Whilst proposals for the site include The Hold as an operator for the market element, the success of this component of the scheme will still be dependant on a good level of occupier interest in the various stalls / units. The three additional F&B units within the scheme will be delivered on a speculative basis, and therefore, occupier demand in this sub-sector will also be important.

Commercial Case Summary

The Commercial Case has considered market sentiment, demand and demographic analysis in order to demonstrate demand for the proposed Market Walk scheme.

The Hold Group are responsible for delivering Stack Newcastle and Stack Seaburn, two highly successful leisure/hospitality and entertainment venues that have continued to perform strongly throughout the past few years even through the pandemic, bucking the trend in leisure & hospitality.

This Commercial Case has also demonstrated the capability and track record of ARBA Group as a developer, providing examples of successfully delivered projects and an overview of the company.

While Northampton's retail and leisure sector has suffered due to the compounding effects of Rushen Lakes, the Covid pandemic and the shift to online shopping, there is a huge opportunity to reimagine the role that leisure/hospitality plays in creating a new town centre anchor by transforming the currently vacant Market Walk Shopping Centre.

The repurposed Shopping Centre will create a prime destination in Northampton for food, drink and entertainment which will attract locals and visitors from neighbouring areas. It will also act as an anchor to support the Council's focus on transforming and enhancing Market Square as a prime events space.

Northampton's current leisure and F&B offer is substantial with 119 F&B businesses located within the town centre (source Northampton Town Centre BID Directory). There is a mix of independent operators, national chains, and multi-site operators, which all offer a more traditional dining/drinking experience.

There is no business currently operating in Northampton or in the wider County that offers a multipurpose venue with independent street food traders, bars, and entertainment, demonstrating there is a gap in the market for this type of offer.

It is anticipated that the scheme will be delivered through a form of Development Agreement and Grant Funding Agreement between the developer (ARBA Group) and WNC, with the latter effectively acting as the accountable body for defrayment of the Towns Fund grant.

6. Management Case

Project Governance and Management

As set out in the Commercial Case, it is anticipated that the scheme will be delivered through a form of Development Agreement and Grant Funding Agreement between the developer (ARBA Group) and WNC, with the latter effectively acting as the accountable body for defrayment of the Towns Fund grant.

WNC will be the Accountable Body for defrayment of the Towns Fund grant associated with the project, and will be responsible for overseeing the financial management and accountability monitoring of the Project.

WNC has an existing team who can supply project management and delivery expertise and can draw in partner resources when relevant, to ensure that the project and partners comply fully with funding legislative requirements.

The project team has a strong and demonstrable track record in delivering major, transformational projects. The Council has put in place the arrangements for successful delivery of the interventions including; a robust governance structure, risk and change management plan, and a system for monitoring and evaluating post-delivery benefits.

This project will be delivered between ARBA Group and WNC, with support from its partners as required. Members of the new authority have been involved in the development of this project through the Northampton Waterside Enterprise Zone which will continue to monitor the project in its role as the Programme Delivery Board.

Information regarding the track record and capability of ARBA Group is included in the Commercial Case.

WNC, and the personnel involved in the project, has significant experience in delivering major capital investment projects (including the design, procurement, and construction of buildings and other facilities) as well as leading on grant funding agreements with third parties to deliver transformational projects within West Northamptonshire.

WNC has delivered the following schemes using the same team and personnel proposed to support on this project:

- Vulcan Works Creative Hub – £14m regeneration project in the heart of Northampton town centre including the new build and refurbishment of a collection of grade II listed derelict structures to provide new quality workspace for businesses in the creative and cultural sectors in West Northamptonshire. Completed in 2021.
- Mulberry Place - £12m regeneration project in Daventry town centre for a brand new start of the art cinema and public realm improvements. Completed in 2022.
- Northampton Museum and Art Gallery - £7m refurbishment in Northampton's cultural quarter which has doubled the size of the museum, new dedicated shoe gallery, two art galleries and a large exhibition space, central hall and a large atrium to support local businesses, artists and makers. Completed in 2021.

The Council also has active grant funding agreements with third parties including:

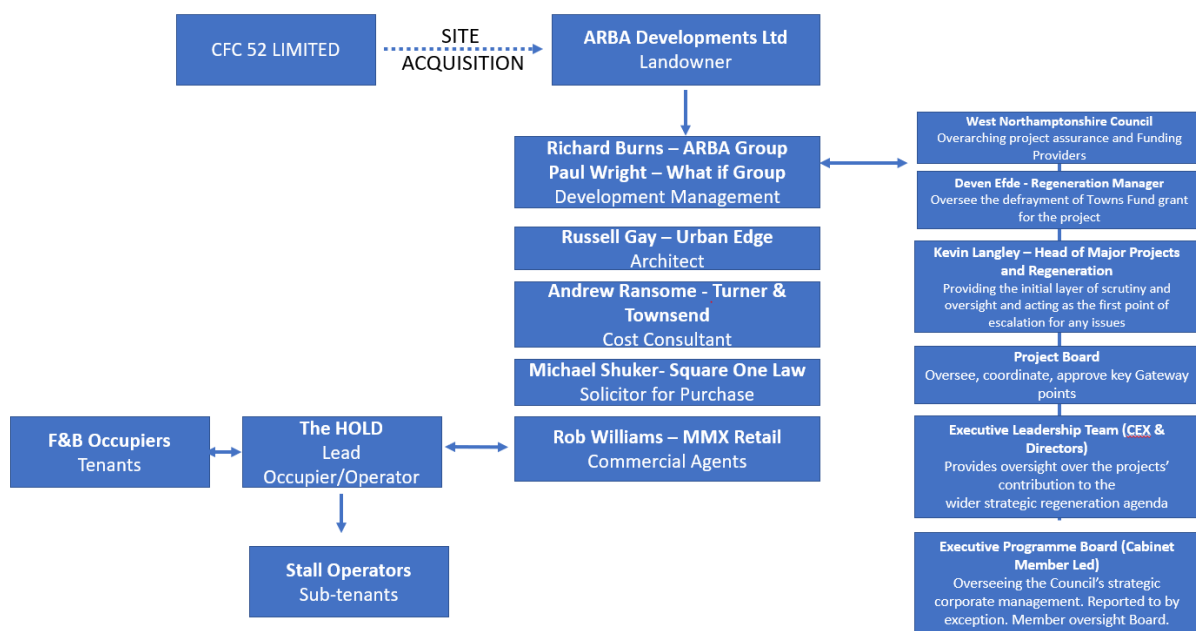
- The 78 Derngate Trust, providing them with a Towns Fund grant to support their extension of the museum.

- The Old Black Lion, providing the Churches Conservation Trust with a Towns Fund grant to support the redevelopment of a Grade II listed derelict pub opposite Northampton train station.

This approach is aligned two quality frameworks – the Councils Code of Corporate Governance which is based on national best practice framework developed by CIPFA/SOLACE (2007), and the Performance Management Framework which provides for agile project management and aligns with all new Unitary frameworks.

At delivery stage, delivery against key project milestones will be monitored through the project governance structure. Overarching project assurance will be provided by West Northamptonshire Council (WNC), with ARBA Group having day-to-day responsibility for the delivery of the project.

This structure is set out in more detail over the page:



Delivery Programme and Key Milestones

Included below are indicative timescales and milestones for the procurement and delivery of the Market Walk scheme.

Project Milestone	Indicative Date
Planning Application Submitted	November 2022
Detailed Design and Procurement of Contractor	November 2022 – April 2023
Planning Approval	May 2023
Completion of Purchase of Market Walk Centre	May 2023
Start on Site & Building Adaptation Works	July 2023
The Hold Fit Out	April 2024 - October 2024
The Hold Commence Trading	October - December 2024

Monitoring and Evaluation and Benefits Realisation

As outlined elsewhere in this Business Case, a wide range of benefits are forecast to be generated through delivery of the programme. We recognise the importance of having robust arrangements in place to allow benefits to be captured and to be alert to instances where there may be challenges to achieving anticipated benefits.

As such, WNC, in conjunction with ARBA Group plans to develop KPIs as part of the Monitoring & Evaluation (M&E) strategy, rather than defining them all at this point. As such, the approach to benefits capture includes:

- Agreeing target benefits at the point of finalising project details, prior to delivery commencing, including indicators to be used, how they are anticipated to arise from supported activities, responsible owners and timescales for achievement.
- Alerting all members of the delivery team to the anticipated range of benefits at the outset of activity so everyone is aware of the target indicators
- Giving the project manager overall responsibility for benefits capture with responsible owners to be identified against each indicator below this.
- Alerting works teams/contractors to the benefits they are responsible for realising and how evidence will need to be captured
- Having clear overall project monitoring and evaluation approaches (as above)
- Reviewing progress against benefits indicators as part of project meetings and agreeing remedial actions in the event of performance below target.
- Completing a benefits register, updated as necessary on a rolling basis (see example template below).

The following example benefits register template has been compiled and will be used for all benefits identified through the Economic Case. The content will remain under review through the course of implementation to ensure identified indicators continue to provide a true reflection of the activities being delivered and benefits arising. These approaches build on the Council's experience of collecting evidence in support of a wide range of capital investment projects. Benefits for the subject site will include:

- Increase of 5% in town centre footfall
- Creation of 50 jobs within 3 years
- Approximately 100,000 sq. ft. of commercial floorspace to be redeveloped / repurposed

Benefit Type	XXXX
Description	XXXX
Responsible Owner	XXXX
Performance measure	XXXX
Data collection method	XXXX
Target	XXXX
Target date	XXXX

As such, the following key outputs and outcomes will be measured/monitored:

Outputs
Repurposing of a redundant shopping centre, comprising approximately 100,000 sq. ft. of retail / ancillary accommodation.
Creation of c. 17,000 sq. ft. GIA of quality F&B accommodation, along with a high quality market offer comprising over 80,000 sq. ft. GIA
Creation of a high quality, prime destination in Northampton for food, drink and entertainment.

Outcomes
Redevelopment of a key town centre site, with the scheme acting as an anchor for future proposals and aspirations for Market Square
Uplift in site value
Provision of new high quality retail / F&B accommodation to meet identified market demand
Improved local socio-economic performance
Increased town centre footfall, with projections for footfall generation of some 1m per year

Stakeholder Engagement and Communication

The development of the Town Investment Plan has been guided by community and stakeholder consultation throughout its development.

The TIP builds on initial consultation work undertaken to inform the development of the Northampton Town Centre Masterplan which seeks to address many of the challenges outlined in this TIP. The consultation exercise for the masterplan informed the early development of the project longlist.

Since the announcement of the Towns Fund, the following process of engagement and consultation has been adopted to shape its development, with further consultation to be undertaken at the planning application stage of development.

Northampton Forward Board

The development of the Northampton Town Investment Plan has been overseen by Northampton Forward Board; a public / private partnership board established in early 2019. The Board is formed of a wide range of partners including:

- West Northamptonshire Council
- Northants Police
- Grosvenor Centre
- Northampton Town Centre BID
- University of Northampton

- Royal and Derngate
- South East Midlands Local Enterprise Partnership (SEMLEP)
- Tricker's
- Northamptonshire Chamber
- Andrew Lewer MP

The Board is responsible for developing the vision and objectives for the Town Investment Plan. It has agreed the Critical Success Factors and prioritised the longlist of projects. Northampton Forward have also overseen the development of the Future High Street Fund Bid and Northampton Town Centre Masterplan, therefore ensuring that all potential development and funding bids are complimentary and coherent.

Online Consultations

Online consultations on the potential TIP proposals were held in September 2020 to determine the community's priorities for investment, gain feedback and opinions on a range of proposed investment areas and determine the challenges / opportunities for the town. Approximately 434 individuals replied to the questionnaire creating a total of 1,495 pieces of project level feedback. The responses were evenly split between males and females. 18% of respondents were aged under-35 and 15% were over-65.

Overall, the majority of responses were positive about how beneficial the projects would be to improve the town centre. The main challenges highlighted were a lack of quality goods offered in the town centre, poor appearance of the town centre and competition with other areas. The main opportunities were bringing disused buildings / public space back into use and improving the public realm. The initial survey was followed by more detailed questioning of a web community across three days.

The consultation identified that Town Centre Public Realm and Market Walk were seen to be the most beneficial to improving the town centre with regards to regeneration. 51% of all participants identified that the Market Walk project would be extremely beneficial to the town centre. This resulted in the project being scored 8.01 out of 10, with the average project scoring just 6.90.

This builds on over two years of consultation completed on the ground and through all media channels. The online consultation completed for the Town Centre Masterplan in 2019 informed the development of the longlist of projects developed for this TIP. Key local priorities identified at that stage include the restoration and upkeep of historic buildings, improving the quality of retail, the quality of public realm and greenspace in enhancing the town centre, pedestrianisation in the town centre, and the potential to accommodate new homes.

Consultation Workshops

A series of consultation workshops were completed in October 2020 focusing on Urban Regeneration; Deprivation and Inequality; and Business, Enterprise and Skills. Approximately 150 stakeholders were approached to take part in the workshops. Workshops were attended by key stakeholders in Northampton including local businesses, social enterprises (Northampton Social Enterprise Town), Community Town Safety Teams, Northampton Digital, Northampton Arts and University of Northampton.

Engagement with private sector bodies aided understanding of growth barriers and helped to ensure the plan remains responsive in uncertain times.

Engagement with public sector and community organisations highlighted how social enterprises can be incorporated into projects.

The consultations produced a number of themes for the Town Investment Plan including re-energising cultural and historic assets, diversifying the housing offer to match the needs of the community, make the town centre feel safer and upgrade / improve management of key public spaces.

Stakeholder Engagement Plan

A Stakeholder Engagement Plan has been developed to accompany the Launch of Northampton's finalised Town Investment Plan. This document sets out our commitment to develop ongoing relationships with key stakeholders to ensure implementation of the Town Investment Plan remains responsive to the overarching needs of the town.

Further scheme specific consultation will be undertaken for the proposals for Market Walk Shopping Centre, leading up to and through the planning process.

Risk Identification and Management Strategy

Risk register being provided by WNC / ARBA Group.

Management Strategy

The Towns Fund project team has a strong and demonstrable track record in delivering major, transformational projects. The Council has put in place the arrangements for successful delivery of the interventions, including: a robust governance structure, risk and change management plan, and a system for monitoring and evaluating post-delivery benefits. The Town Investment Plan will be delivered West Northamptonshire Council.

Members of the new authority have been involved in the development of the TIP through the Northampton Forward Board which will continue to act as the Programme Delivery Board for the TIP.

This approach is aligned to two quality frameworks – the Council's Code of Corporate Governance which is based on national best practice framework developed by CIPFA/SOLACE (2007), and our Performance Management Framework – and will align with all new Unitary frameworks.

Management Case Summary

WNC will be the Accountable Body for defrayment of the Towns Fund grant associated with the project, and will be responsible for overseeing the financial management and accountability monitoring of the Project.

WNC has an existing team who will supply project management and delivery expertise and will draw in partner resources when relevant, to ensure that the project and partners comply fully with funding legislative requirements.

The project team has a strong and demonstrable track record in delivering major, transformational projects. The Council has put in place the arrangements for successful delivery of the interventions including; a robust governance structure, risk and change management plan, and a system for monitoring and evaluating post-delivery benefits.

As outlined elsewhere in this Business Case, a wide range of benefits are forecast to be generated through delivery of the programme. We recognise the importance of having robust arrangements in place to allow benefits to be captured and to be alert to instances where there may be challenges to achieving anticipated benefits. As such, WNC, in conjunction with ARBA Group plans to develop KPIs as part of the M&E strategy, rather than defining them all at this point.

The development of the Town Investment Plan has been guided by community and stakeholder consultation throughout its development. The development of the Northampton Town Investment Plan has been overseen by Northampton Forward Board; a public / private partnership board established in early 2019.

Online consultations on the potential TIP proposals were held in September 2020 to determine the community's priorities for investment, gain feedback and opinions on a range of proposed investment areas and determine the challenges / opportunities for the town. The consultation identified that Town Centre Public Realm and Market Walk were seen to be the most beneficial to improving the town centre with regards to regeneration. 51% of all participants identified that the Market Walk project would be extremely beneficial to the town centre.

Appendix A – Development Appraisal Summary

Market Walk Shopping Centre, Northampton
Towns Fund Appraisal v3
Exc. Inflation

**Market Walk Shopping Centre, Northampton
Towns Fund Appraisal v3
Exc. Inflation**

Summary Appraisal for Phase 1

Currency in £

REVENUE

Rental Area Summary

	Units	ft ²	Rent Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
The Hold	1	58,583	4.27	250,000	250,000	250,000
Unit A	1	4,684	18.15	85,000	85,000	85,000
Unit B	1	6,166	16.22	100,000	100,000	100,000
Unit C	1	2,868	19.18	55,000	55,000	55,000
Totals	4	72,301			490,000	490,000

Investment Valuation

The Hold

Market Rent	250,000	YP @	10.0000%	10.0000	
(1yr Rent Free)		PV 1yr @	10.0000%	0.9091	2,272,727

Unit A

Market Rent	85,000	YP @	9.0000%	11.1111	
(1yr Rent Free)		PV 1yr @	9.0000%	0.9174	866,463

Unit B

Market Rent	100,000	YP @	9.0000%	11.1111	
(1yr Rent Free)		PV 1yr @	9.0000%	0.9174	1,019,368

Unit C

Market Rent	55,000	YP @	9.0000%	11.1111	
(1yr Rent Free)		PV 1yr @	9.0000%	0.9174	560,652
					4,719,210

GROSS DEVELOPMENT VALUE

4,719,210

Purchaser's Costs			(320,906)	
Effective Purchaser's Costs Rate	6.80%		(320,906)	

NET DEVELOPMENT VALUE

4,398,304

Additional Revenue

Towns Fund Funding - Purchase	2,100,000	
Towns Fund Funding - Construction	2,075,000	
		4,175,000

NET REALISATION

8,573,304

OUTLAY

ACQUISITION COSTS

Market Walk Shopping Centre Acquisition		2,000,000	
			2,000,000
Stamp Duty		87,500	
Agent Fee	1.00%	20,000	
Legal Fee	0.75%	15,000	
			122,500

CONSTRUCTION COSTS

Contingency	10.00%	359,504	
			359,504

Other Construction

The Hold Fit Out Contribution	750,000
Building Adaptation Cost	2,845,040
Unit A Fit Out Contribution	400,000
Unit B Fit Out Contribution	500,000
Unit C Fit Out Contribution	250,000

**Market Walk Shopping Centre, Northampton
Towns Fund Appraisal v3
Exc. Inflation**

			4,745,040
PROFESSIONAL FEES			
Professional Fees	10.00%	359,504	
			359,504
MARKETING & LETTING			
Marketing	1.00%	47,192	
Letting Agent Fee	10.00%	24,000	
Letting Legal Fee	5.00%	24,500	
			95,692
DISPOSAL FEES			
Sales Agent Fee	1.00%	47,192	
Sales Legal Fee	0.50%	23,596	
			70,788
FINANCE			
Debit Rate 6.5000%, Credit Rate 0.0000% (Nominal)			
Land		88,230	
Construction		304	
Total Finance Cost			88,534
TOTAL COSTS			7,841,562
PROFIT			
			731,742

Performance Measures

Profit on Cost%	9.33%
Profit on GDV%	15.51%
Profit on NDV%	16.64%
Development Yield% (on Rent)	6.25%
Equivalent Yield% (Nominal)	9.48%
Equivalent Yield% (True)	10.07%
 IRR	 40.97%
 Rent Cover	 1 yr 6 mths
Profit Erosion (finance rate 6.500)	1 yr 5 mths

Appendix B – Order of Cost Estimate (Turner & Townsend)



**Market Walk Northampton,
Shell and Core Works**

**What If Group and
ARBA Group**

Order of cost estimate
Feasibility Estimate

Contents

Section 1 - Project Particulars	3
Section 2 - Cost Plan Scope	4
Section 3 - Financial Summary	6
Section 4 - Basis of Cost Plan	9

Appendix A - Turner & Townsend Market intelligence Report

Quality check

Rev	Status	Prepared by	Checked by	Date	Issued to	Company	Transmission	Date
1	Final	Andrew Ransome	Paul Humble	10.08.22	Paul Wright	What If Group	Email	10.08.22

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Section 1 - Project Particulars

Client:	What If Group
Project:	Market Walk Shell and Core Works
Location:	Northampton
Works:	Feasibility Benchmarking
Programme:	TBC
Budget:	TBC
Base Date:	Jul-22
RIBA Stage:	Feasibility (RIBA Stage 1)
Procurement Strategy:	Design & Build (assumed)
Contract Form:	JCT Design and Build Contract 2016 (assumed)
Team:	
Architect	Urban Edge
Engineer	N/A
M&E Engineer	N/A
GIFA (m2)	9300

Section 2 - Cost Plan Scope

The following list is to be reviewed with and agreed with What If Group and is a guide to the scope of the cost plan, client's budget and items outside of the project scope:

No.	Item	Included in Cost Plan Scope	Included in Client Scope	Outside of Project Scope
1	Main contractor preliminaries (10%).	●		
2	Design Development and risk (5%).	●		
3	Main contractors overheads and profit (6%).	●		
4	Project / design team fees.		●	
5	Legal fees.		●	
6	Asbestos removal.			●
7	New/upgrade of existing statutory services.			●
8	Future changes to building regulations.			●
9	Temporary services.		●	
10	Client insurances for the building works.	●		
11	Contractor risk allowances.	●		
12	Inflation beyond 2Q2023.			●
13	Finance charges, costs and fees.		●	
14	Survey fees.		●	
15	Value added tax.		●	
16	Diversion of existing services.			●
17	Planning / building control fees.		●	
18	Section agreements.		●	
19	Slab Strengthening or pits for equipment.			●

Section 2 - Cost Plan Scope

The following list is to be reviewed with and agreed with What If Group and is a guide to the scope of the cost plan, client's budget and items outside of the project scope:

No.	Item	Included in Cost Plan Scope	Included in Client Scope	Outside of Project Scope
17	Removal of contaminated material.			●
18	No allowance for process equipment and associated MEP.		●	
19	Assumed site wide services infrastructure already in place.		●	
20	Sprinkler systems.			●
21	Intruder alarms, telephones and data systems.			●
22	FF&E.			●
23	External signage and way finding.			●
24	BREEAM			●
25	Excavation or works to existing substructures			●
26	Requirements for the construction of new public rights of way.			●
27	4nr new staircases to be installed	●		
28	Replacement of existing fire escape stairs			●
29	Internal partitions to deliniate between units	●		
30	Any other partitions associated with fit out works			●
31	Floor and ceiling finishes other than making good existing substrate			●
32	Allowance for skim coat and plaster finsih to existing walls where required	●		
33	Provisional allowance for alterations to drainage to accommodate open roof	●		
34	Upgrading of internal building fabric to accommodate external environment			●
35	Breaking ourt existing concrete floors to creat full height void	●		
36	Provisional allowance for glazed roof	●		
37	Structural improvements as a result of cutting out floor slabs			●

Section 3 - Financial Summary

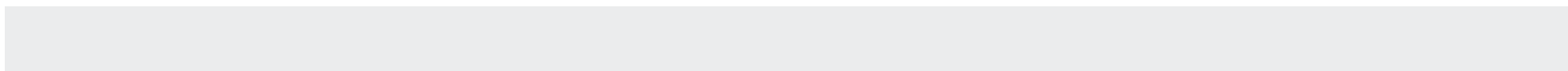
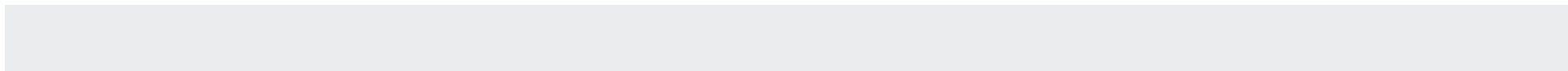
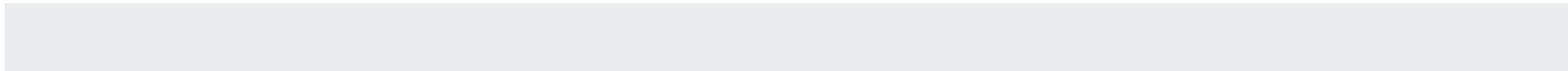
Ref	Description	Total (£s)		Cost / m2 (£s)	
0	Facilitating Works	£	-	£	-
0.1	Toxic / hazardous / contaminated material removal		Excl.		Excl.
0.2	Major demolition works		Excl.		Excl.
0.3	Specialist groundworks		Excl.		Excl.
0.4	Temporary diversion works		Excl.		Excl.
0.5	Extraordinary site investigation works		Excl.		Excl.
1.0	SUBSTRUCTURE				
1.1	Substructure		Excl.		Excl.
2.0	SUPERSTRUCTURE	£	1,150,000	£	124
2.1	Frame		Excl.		Excl.
2.2	Upper floors		Excl.		Excl.
2.3	Roof		600,000.00		64.52
2.4	Stairs and ramps		150,000.00		16.13
2.5	External walls		300,000.00		32.26
2.6	Windows and external doors		Excl.		Excl.
2.7	Internal walls and partitions		100,000.00		10.75
2.8	Internal doors		Excl.		Excl.
3.0	INTERNAL FINISHES	£	-	£	-
3.1	Wall finishes		Excl.		Excl.
3.2	Floor finishes (making good existing floors)		Excl.		Excl.
3.3	Ceiling Finishes		Excl.		Excl.
4.0	FITTINGS, FURNITURE AND EQUIPMENT	£	-	£	-
4.1	Fittings, furnishings and equipment		Excl.		Excl.
5.0	SERVICES	£	440,000	£	47

5.1	Sanitary installations (inc refurbishment of GF toilets)		40,000.00		4.30
5.2	MEP generally		400,000.00		43.01
6.0	PREFABRICATED BUILDING AND BUILDING UNITS	£	-	£	-
6.1	Prefabricated buildings and units		Excl.		Excl.
7.0	WORK TO EXISTING BUILDING (DEMOLITIONS)	£	700,000	£	75
7.1	Minor demolition works and alteration works		700,000.00		75.27
7.2	Repairs to existing services		Excl.		Excl.
7.3	Damp-proof courses / fungus and beetle eradication		Excl.		Excl.
7.4	Façade retention		Incl. in External Walls		Excl.
7.5	Cleaning existing surfaces		Excl.		Excl.
7.6	Renovation works		Excl.		Excl.
8.0	EXTERNAL WORKS	£	150,000	£	16
8.1	Site preparation works		Excl.		Excl.
8.2	Roads, paths, pavings and surfacings		Excl.		Excl.
8.3	Soft landscaping, planting and irrigation systems		Excl.		Excl.
8.4	Fencing, railings and walls		Excl.		Excl.
8.5	External fixtures		Excl.		Excl.
8.6	External drainage		150,000.00		16.13
8.7	External services		Excl.		Excl.
8.8	Minor building works and ancillary buildings		Excl.		Excl.
	FACILITATING AND BUILDING WORKS TOTAL	£	2,440,000	£	262
9	Main Contractors Preliminaries		244,000.00		26.24
	FACILITATING AND BUILDING WORKS TOTAL (incl. preliminaries)	£	2,684,000	£	289
10	Main Contractors Overheads and Profit		161,040.00		17.32
	Total: Building works estimate	£	2,845,040.00	£	306

		Excl.	Excl.
11	Project / design team fees		
	Base cost estimate	£ 2,845,040.00	£ 306
12	Risks and Design Development (5%)	£ 142,252.00	15.30
	Total construction cost (excluding inflation)	£ 2,987,292.00	£ 321
13	Inflation (see Appendix A)	£ 119,491.68	12.85
	Estimated overall project cost	£ 3,106,783.68	£ 334.06
	Rounded estimate to nearest £10,000.00	£ 3,100,000.00	£ 333.33

Section 5 - Basis of Cost Plan - Information Used

Title	Reference	Revision / Status	Type	Received
Ground Floor Area	2628-URB-ZZ-GF-DR-A-103150	P00	PDF	23.06.22
Upper Ground Floor	2628-URB-ZZ-UG-DR-A-103150	P00	PDF	23.06.22
First Floor Area	2628-URB-ZZ-FF-DR-A-103150	P00	PDF	23.06.22
Level Four Layout	17070365_205	0	PDF	23.06.22
Level 0 Floor Layout	17070365/201	0	PDF	23.06.22



Appendix A - Market Conditions

Market Conditions

Warm

The current construction tender market is seeing much higher than anticipated prices which is reflecting the current unprecedented state of the tender market with greater levels of price and supply uncertainty. The Ukraine conflict coupled with the recent surge in oil, gas and coal prices has massively affected all levels of the construction supply chain and has led to enforced rate rises well beyond any tender price inflation index allowances.

The market appears to be very much in 'shock' mode at the moment and a 'fear factor' / risk is being priced at all levels of the supply chain and there are no signs that this position is going to improve in the short term. It is almost impossible to get fixed prices from the supply chain and we are seeing price rises across all areas of construction trades. Higher prices for commodities are one of the key drivers behind these increased inflation allowances. Market volatility has been pronounced and prices are more sensitive to shocks, with many commodity indices rising globally.

There is also a great deal of concern over the stability of the supply chain particularly anything steel related following an increase by British Steel of +£250/tonne (their largest increase ever and equating to around +25% on supply price) so care should be taken in engagement with all main and sub-contractors to ensure that appropriate insurance / bonds / guarantees / warranties can be put in place.

The unprecedented tender price increases therefore raises a concern over the predictability and certainty of tender price indexation at the moment until sufficient market data is captured to reflect the current situation and perhaps even more concerning is that at this stage it is very difficult to reasonably estimate when this price inflation and material availability will stabilise or show signs of reducing.

Contact

Andrew Ransome
Senior Cost Manager

3rd Floor, 32 Gallowgate
Newcastle upon Tyne
NE1 4SN
0191 279 7200

andrew.ransome@turntown.co.uk

Appendix C – Subsidy Control Compliance Advice Note



PRIVILEGED & CONFIDENTIAL

Kevin Langley
Head of Major Projects and Regeneration
West Northamptonshire Council
The Guildhall
St Giles Square
Northampton
NN1 1DE

Your Ref:
Our Ref: 2037891-6
Please quote this when replying
Date: 26 August 2022
Please ask for: Jonathan Branton
Mobile: 07736 563202
E-mail: Jonathan.Branton@dwf.law

Dear Kevin,

Subsidy Control Opinion: Market Walk Shopping Centre

We are instructed by West Northamptonshire Council ("the Council") to advise on the Subsidy Control compliance of a proposed grant of £4.2m from the Towns Deal fund (hereafter "the Grant"). The Grant is secured originally from the Department for Levelling Up, Housing and Communities ("DLUHC") and is proposed to be awarded to a particular developer (identity to be confirmed, hereafter "the Developer"), with a view to closing the viability gap for the delivery of a modernised series of retail units at Market Walk Shopping Centre, Market Walk, Northampton ("the Project"). The Developer will develop the site at a cost estimated at £8.4m (which includes a 10% developer's return) and provide the funding balance of £4.2m from commercial sources.

Our summary views are as follows:

- the Grant is not a subsidy when it first passes from DLUHC to the Council, on the basis the Council acts as an accountable body to pass through and administer the relevant funds;
- the Grant will be a *prima facie* subsidy when it is legally committed to the Developer (by way of a Grant Funding Agreement) given that it is to a property developer for a commercial venture in a competitive market (ie. an entity offering goods or services on a market, so an "enterprise");
- given the proposed award is well above £315k then in order to be awarded lawfully it will need to be found in compliance with all the Subsidy Control Principles ("the Principles") set out in Schedule 1 of the Subsidy Control Act 2022 ("the Act")¹ and not in breach of any other relevant provisions. Most particularly within this, the proposed subsidy will need to be determined as the minimum amount necessary (normally done by viability gap appraisal or equivalent) to secure the reasonable public policy objective intended;

¹ From a technical perspective the requirement now is to fulfil the six Common Principles from Article 366 of the EU/UK Trade & Cooperation Agreement, albeit by the time the funding is in place this is likely to have been replaced by the seven Principles at Schedule 1 of the Act.

- the Developer's contribution will be sourced by private commercial/developer equity funding. If there is found to be any sub-commercial element in the loan then this too could be regarded as a subsidy to the Developer and added to the Grant (hence the verification of this loan as non-subsidy will be important);
- for third party suppliers and contractors to the Council in respect of all the above, there should be no subsidy to them provided they are remunerated at market rate and no more. This can be presumed when such parties are engaged by reference to open competitive procurement methods and failing this by a simple benchmarking exercise; and
- following the award of the funding, the Council will need to undertake minimum publication requirements for basic details of the award, following which a short potential challenge period will ensue and if no challenge is forthcoming within three months at the latest then any future challenge by a competitor will be time-barred.

The above is based on new UK Subsidy Control law since the proposed awards of grant funding needs to comply with the new Subsidy Control rules, given that each will be committed after 11pm on the 31 December 2020, which means the body awarding the public funding should carry out an assessment against each of the UK's international subsidy commitments. This includes the Act², draft guidance on UK Subsidy Control published by DBEIS on 1 July 2022³ ("the Draft Guidance"); Chapter 3 of the *EU / UK Trade & Cooperation Agreement*⁴ ("TCA"), Article 10 of the Northern Ireland Protocol⁵, Article 138 of the Withdrawal Agreement⁶, the WTO rules⁷ and other trade agreements that the UK has in place⁸ (NB. for present purposes we believe only the Act and the TCA are engaged).

Our advice is also based upon the law in force at the date of this letter (albeit also in contemplation of future law to be implemented in due course via the Act) and our understanding of the facts of the Project.

A. Our understanding of the facts

We derive our facts from Cushman and Wakefield draft Outline Business Case (OBC) of 22 August 2022 as summarised below.

² In particular, the definitions of "Subsidy" and "Enterprise" which came into effect on 28 April 2022 by operation of Section 91(1)(a) of the Act.

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087649/subsidy-control-act-2022-draft-guidance.pdf

⁴ The Trade and Cooperation Agreement between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland, of the other part, which was incorporated into law within the UK by the European Union (Future Relationship) Act 2020.

⁵ Revised Protocol to the Withdrawal Agreement (October 2019) as clarified by the Joint Declarations dated 10 December 2020.

⁶ Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community.

⁷ Including the Agreement on Subsidies and Countervailing Measures.

⁸ A full list of trade agreements is accessible here: <https://www.gov.uk/guidance/uk-trade-agreements-with-non-eu-countries>.

A.1 The Project

The Project constitutes the regeneration and development of a currently redundant and derelict retail space called Market Walk Shopping Centre in Northampton. The OBC describes the proposed redevelopment as follows:

"The creation of a space for multiple independent street food operators is proposed, that will serve a wide variety of good quality, modern street food cuisine from local independent traders. A number of retail units would be transformed into bars, each with their own unique look and offer, and there will also be provision for competitive socialising including various leisure activities. The bars and street food units would be located around a communal open seating area focused on a main stage, which would provide a space for live music performances and entertainment. The centre would retain active frontages to Market Square and Abington Street. A key element will be to create an external space that offers outdoor drinking and dining, which is currently envisaged to be achieved through the inclusion of a retractable roof."

A.2 Parties involved

The precise identity and make up of the Developer is to be confirmed but it is anticipated to be a commercial property developer, which will purchase the freehold interest in the site from the current (private sector) owner. The Developer then hopes to obtain the Grant from the Council against the costs of the Project.

A.3 Costs and funding of the Project

The OBC development appraisal provides the RICS/QS assessed costs as follows:

Description	£
Site acquisition from	2,122,500
Construction	4,745,040
Professional Fees	359,504
Finance Cost	88,534
Contingency	359,504
Total Cost before developer's return	7,675,082
Developer's return (10%)	731,742
Total Cost after developer's return	8,406,824

The Developer's return is benchmarked in the development appraisal/OBC as the minimum required to interest the market. The development appraisal also identifies the development value based on projected revenues

over the asset's estimated useful life as £4.4m from which we have taken off marketing, letting and disposal costs to arrive at £4.2m. This is the viability gap for the Project. The sources of funding are therefore:

Source	%	£'m
The Grant	50	4.2
the Developer (commercial loan)	50	4.2
Total		8.4

Our opinion below is based on the accuracy of the facts above so please correct us if mistaken.

B. The UK Subsidy Control rules

B.1 Overview of the new UK regime

Although promoted as a single set of rules, in practice the UK Subsidy Control regime requires checks against all the UK's international and domestic commitments relating to the award of subsidies.

Subsidy controls are also applicable via other international obligations for the UK such as those deriving from World Trade Organisation membership⁹ and specific Free Trade Agreements entered into with particular countries apart from the EU (eg. Japan, Korea, Israel, Georgia and Australia) as well as the Northern Ireland Protocol¹⁰. However, it seems quite clear that the Project, as a local support in Northampton only (with no apparent effects on trade in exports of goods or Northern Ireland in any way and not involving EU funds such as ESIF), does not raise any reasonable prospect of invoking any issues in respect of these additional frameworks. We have therefore not considered these additional frameworks any further for the purposes of this advice.

B.2 What is a subsidy?

Since 28 April 2022, Section 2(1) of the Act has defined subsidy as: "*financial assistance which—*

⁹ The WTO Agreement on Subsidies and Countervailing Measures is not a domestic subsidy regime, but rather is a means for countries that are signatories to take actions to protect their own markets by countering the effects of subsidised imports which cause injury to their domestic industry producing the like product. Under the agreement, a country can use the WTO's dispute-settlement procedure to seek the withdrawal of the subsidy or to take actions to mitigate the adverse effects on its businesses. Therefore, the WTO rules assessment does not consider the impact of a single subsidy on particular businesses in a home country but rather takes account of how measures affect trade in other markets and sectors in other countries. Furthermore, whilst measures are sometimes actionable, it is comparatively rare for action to be taken.

¹⁰ The Northern Ireland Protocol applies EU State aid law to measures within the scope of Article 10 thereof. These are situations where a measure has an effect upon trade between Northern Ireland and the European Union and falls within the scope of the Protocol (which is focussed upon goods and the electricity market). BEIS Guidance Notes of 31 December 2020 consider that Article 10 has limited applicability, noting the statement by the EU on 17 December 2020 that "*the effect on trade between Northern Ireland and the Union which is subject to this Protocol cannot be merely hypothetical, presumed, or without a genuine and direct link to Northern Ireland. It must be established why the measure is liable to have such an effect on trade between Northern Ireland and the Union, based on the real foreseeable effects of the measure*".

- (a) is given, directly or indirectly, from public resources by a public authority,
- (b) confers an economic advantage on one or more enterprises,
- (c) is specific, that is, is such that it benefits one or more enterprises over one or more other enterprises with respect to the production of goods or the provision of services, and
- (d) has, or is capable of having, an effect on—
 - (i) competition or investment within the United Kingdom,
 - (ii) trade between the United Kingdom and a country or territory outside the United Kingdom, or
 - (iii) investment as between the United Kingdom and a country or territory outside the United Kingdom".

We note that the above requirements (a) to (d) are cumulative, ie. if any one of these requirements is not met then the measure in question cannot be a subsidy.

Although the terminology is slightly different to that used in EU State aid law, we note that the substance of what constitutes a subsidy and a State aid is very similar¹¹, with the exception of the final limb which is now narrower than under EU State aid law (thereby potentially applying to measures which even have only a domestic effect). The similarities are very helpful because there is extensive case law as to what is, and what is not, a State aid, which can be used as a reference point to determine the presence of a subsidy.

As will be explained further below, this is useful in that it allows guidance from State aid law to be harnessed for the understanding of the various limbs set out above; in particular, what constitutes *advantage to an enterprise* being substantively the same notion as what constitutes *advantage to an undertaking* under State aid law.

The similarities mean that in assessing the presence of subsidy we believe it remains necessary to take account of the *Leipzig Halle*¹² case, which established that a State aid may arise when a public body receives funding to install infrastructure which is commercially exploitable. This addressed the question of when a public body is engaged in economic activities (and is therefore to be considered an undertaking) or not.

What is an enterprise¹³ is clarified at Section 7(1) of the Act and concerns being "*engaged in an economic activity that entails offering goods or services on a market, to the extent that the person is engaged in such an activity*". This is essentially the same notion as in State aid law for which the comparable term is an "*undertaking*". Section 7(2) of the Act clarifies that "*an activity is not to be regarded as an economic activity if or to the extent that it is carried out for a purpose which is not economic*". There is no basis from the definition

¹¹ This also makes inherent sense on the basis that these provisions are intended to allow the UK to set up a parallel Subsidy Control regime to the EU's State aid regime based on common founding principles and minimum standards.

¹² C-288/11 P.

¹³ The TCA introduces a parallel notion of an "*economic actor*", which this reference to "*enterprises*" replaces. However for immediate purposes we do not believe the characterisation as an enterprise or economic actor makes any difference. Both notions are in effect modelled upon the EU law notion of an "*undertaking*".

in the Act to suppose that a local authority engaged in economic activities would escape from being an enterprise purely on the basis of being an arm of State. This appears to be further confirmed by the Draft Guidance.

B.3 How to render a subsidy lawful

When a 'subsidy' is present, the funding may still be lawfully awarded provided certain steps specified in the TCA are taken (soon to be replaced by relevant comparable provisions in the Act).

For smaller value awards, funding may proceed under the cover of the Small Amounts of Financial Assistance ("SAFA") provision, which works in a similar way to previous EU De Minimis aid, albeit with approximately double the allowance. However, the SAFA is limited to awards of up to 325,000 special drawing rights (currently c £354,000¹⁴) over three fiscal years per enterprise, and the Act will in due course re-name and convert this to the *Minimal Financial Assistance* route which is fixed at £315,000 in the current and two previous financial years.

For other awards, funding may be lawfully awarded by demonstrating that the measure respects each of the Subsidy Control Principles listed at Article 366 TCA (and in some limited cases, not considered relevant here, the additional requirements for so-called *Services of Public Economic Interest*).

Although not in force at this time, Schedule 1 of the Act¹⁵ includes a seventh principle and also slightly re-phrases the six principles as written in the TCA. By the time the funding is in place this is likely to have been replaced by the seven Principles at Schedule 1 of the Act. We will therefore work on this basis immediately even though not technically yet law. The Principles are:

1. *subsidies should pursue a specific public policy objective in order to (a) remedy an identified market failure or (b) to address an equity rationale such as regional disadvantage, social difficulties or distributional concerns;*
2. *subsidies should be proportionate to their specific public policy objective and limited to what is necessary to achieve it;*
3. *subsidies should be designed to bring about a change of economic behaviour of the beneficiary. That change, in relation to a subsidy, should be (a) conducive to achieving its specific public policy objective, and (b) something that would not happen without the subsidy;*
4. *subsidies should not normally compensate for the costs the beneficiary would have funded in the absence of any subsidy;*
5. *subsidies should be an appropriate policy instrument for achieving their specific public policy objective and that objective cannot be achieved through other, less distortive, means;*

¹⁴ International Monetary Fund, *SDRs per Currency unit and Currency units per SDR*. Accessible here: https://www.imf.org/external/np/fin/data/rms_five.aspx. The conversion rate at 8 August 2022 was 1.089.

¹⁵ Expected to come into force in Autumn 2022.

6. *subsidies should be designed to achieve their specific policy objective while minimising any negative effects on competition or investment within the United Kingdom; and*
7. *subsidies' beneficial effects (in terms of achieving their public policy objective) should outweigh any negative effects, including in particular negative effects on (a) competition or investment within the United Kingdom; (b) international trade or investment.*

For avoidance of doubt, we consider that by satisfying the above there can be no danger of being considered not to satisfy the six Common Principles as they are written in the TCA.

There is currently no procedural facility for awarding authorities to obtain confirmation of their assessments as to compliance with the Principles, so it is necessary for awarding authorities to self-assess.

The Act introduces procedures for potential notification of larger scale subsidies to the CMA for a non-binding view prior to award and introduces a mandatory notification requirement for the largest subsidies, currently anticipated to be those of a cumulative value per project in excess of £10m (or £5m+ for certain sensitive sectors). As noted above, it is expected (subject to the anticipated progress of new law) that the proposed award of £4.2m will not need to be notified to the CMA for analysis and a non-binding view prior to award (without which the award would be prohibited). However, this should be kept under review until the law in this respect is confirmed.

There are certain other requirements which awarding authorities need to be aware of such as not falling foul of any of the prohibitions set out in the TCA, and once acknowledged subsidies have been awarded under the Principles (NB. not for SAFA awards) then minimal details regarding the same must be published within six months of award. The Act adapts these requirements slightly going forwards, for example reducing the post-award time limit for publication to three months and reducing the threshold for publication of subsidy awards to £100,000 per subsidy.

B.4 Dealing with challenges and transparency publication

In terms of potential challenge, the UK and European Commission (on behalf of the EU) have the right to challenge each other's subsidies under the TCA and seek remedial measures in exceptional circumstances where significant injury to the other's economic interests can be shown. We would only expect this to be invoked in regard to large high profile subsidies with international effects, ie. hence we disregard any possibility for this case.

More realistic in this case is challenge by way of judicial review brought in a national court by an 'interested party', ie. usually a competitor of some sort. Although we have not been informed that an interested party is preparing a complaint in the present case, this is the risk against which to prepare.

Under Article 373 TCA, the short window for challenge under UK national law commences upon the transparency (publication) requirements referred to above being met. We address this in more detail in Section F below, but the headline point is that the time period within which challenges can be made is significantly

reduced under the new regime (from ten years from last award under State aid, to up to 3 months from publication now). The challenge period starts upon the publication of brief details of the award.

We also note that where Central Government funding is involved that Subsidy Control is likely to be a compliance risk which may be audited. Therefore, it is sensible to collect and retain records that demonstrate compliance.

C. Will the proposed LUF award constitute a subsidy to the Developer?

C.1 Initial transfer from DLUHC to the Council

The first transfer is from Central Government (DLUHC) to the Council. Measures will be in place to show that the Council receives this funding in its capacity as an accountable body. As such the Council is not an enterprise for the purposes of this transaction.

C.2 £4.2m to the Developer: Subsidy

In terms of whether a subsidy exists (see tests in Section B.2 above), the assumption should be that there is a subsidy arising to the Developer through the award of £4.2m from the Council.

This is because the Council's onward payment of the Grant to the Developer is for the purposes of engaging in a commercial real estate opportunity for which the Developer offers goods or services on a market. This is deemed economic activity in which there is a full and competitive market. This means that as a commercial private sector operator, it should be expected to be considered an enterprise. The award is a *prima facie* subsidy to the Developer as it is given from State resources to a specific enterprise as a gratuity, from which it is not possible to exclude a potential effect on trade or investment in the UK.

Having established that the proposed funding is a subsidy, the payment then needs to be justified against the Principles set out in Section B.3 above. The biggest challenge normally revolves around being certain that the subsidy is the minimum necessary as per Principle 2, which normally requires careful satisfaction of funding limited to a viability gap and relevant due diligence of the need for that amount of subsidy accordingly, which also in turn implies having been satisfied in advance that the costs and the desired specification are appropriate too.

D. Awarding as a subsidy pursuant to the Principles

D.1 Basics of the Principles

The target here is for each public authority funder to demonstrate compliance against each of the Principles, and by "demonstrate" we mean relying on an evidence trail and not simply making assumptions or "taking an applicant's word for it". We have offered preliminary suggestions below for how this might be achieved.

The nature of the Principles is imprecise in each case, in that they are not subject to the same precise thresholds against specific costs and other specific requirements that EU law sets out in block exemptions. Rather, the Principles are ultimately about taking a sound decision against a series of frames of reference. This therefore

implies a degree of discretion for the awarding authority (here the Council) in taking the decision. What would be examined in a challenge is the reasonable (or not) way in which the decision was taken. This most of all implies a need to show that each decision was considered properly in context and against a reliable and diligent examination of evidence. Defending such a decision later would particularly rely on being able to show the evidence had been suitably gathered to inform the decision. Were the matter to receive a challenge this would be by way of judicial review against the decision of the Council, which would test that finding under standard principles of UK public law. New challenge procedures are discussed in Section F below.

The commentary in Section D.3 below against each Principle here should be viewed as a start point only. It is anticipated that considerable work will have already been done on Project appraisals already and we would expect this work to contain evidence to satisfy the relevant tests below. In the event of a lack of evidence on any of these points then they should be considered afresh in order to be sure of compliance and further evidential support (by independent experts where relevant) should be commissioned.

The precise level of subsidy will need to be determined and this goes to the heart of Principle 2 referred to in B.3 above and as discussed under D.2 below. For avoidance of doubt, this would need to include any other public intervention that was under contemplation, assuming all to be considered against the same costs.

Once the analysis of the Principles is complete, we recommend documenting the same in a *pro forma*¹⁶ which records the basis for the conclusion that the Principles are met. Completing the *pro forma* also reflects BEIS' guidance of 31 December 2020.

D.2 Specifics of each Principle

We now address each of the Principles in turn, noting that each needs its own answer and justification against the facts of the intervention, and targets different issues of compatibility.

1. **Subsidies should pursue a specific public policy objective in order to (a) remedy an identified market failure or (b) to address an equity rationale such as regional disadvantage, social difficulties or distributional concerns**

The OBC provides an equity rationale for the Project:

"the unprecedented levels of change experienced by Northampton's town centre in recent times has created a series of challenges it must tackle and overcome: - 15% reduction in footfall between 2015 and 2019 - 23 retail businesses vacated the town in 2020 - 21.8% of town centre units were vacant in Q4 2020 - 36.8% decline in prime retail rents achievable between 2017 and 2020 Outline Business

¹⁶ The point of the pro forma is to provide a contemporaneous record of the basis for the award decision, as this is what a challenge would test. The pro forma does not necessarily constitute the formal defence to a challenge against the subsidy compliance of the Grant, and neither is it a document that should be expected to be published, but rather it is an aide memoire to force contemporaneous consideration of the relevant issues prior to award of a relevant subsidy. It may form the basis of a document that the Council would reply with if later questioned by an interested party as to how it satisfied the Principles in a particular case. Should that happen it is vital that the table presents a true and correct summary of the facts and analysis done at the time of the subsidy being awarded.

Case – Market Walk Shopping Centre, Northampton Project 10 - Only 3% of all office space classed as high quality - 86.6% of children for whom benefits are claimed - 47.7% of those in employment are in the 'at risk' categories - 24,000 crimes took place in Northampton in 2019."

We would advise the equity rationale is developed into a specific objective using evidence such as public consultations, stakeholder consultations, market and demand surveys. The OBC provides:

"The Northampton Town Centre Masterplan identified the Market Square as a key area for intervention within the town. The masterplan identified that the Market Square's deep-rooted function has always focused around commerce and trade, and that any opportunities in this area will reposition Market Square at the centre of a stronger, consolidated retail core and re-establish the square as the heart of the town centre."

If evidence described above has been obtained while developing the masterplan (ie. why this particular nature of activity is needed at this time at this location) then it should be summarised in answering this principle. In particular the evidence to support the following objectives identified in the OBC should be maintained.

"- repurposing of approximately 100,000 sq. ft. of redundant and vacant retail / ancillary accommodation, by 2024.

- provide new, quality accommodation for c. 13 / 14 new businesses, and deliver a total of 170 permanent local jobs including venue managers, food managers, supervisors, bar staff, kitchen staff and local marketing and sales roles as well as trader employees, all by 2024 / 2025.

- provide local residents and visitors with a place to meet, socialise and network with others. It is estimated that the completed scheme will generate footfall in the region of 1m people per year, by 2024 / 2025."

OBC also highlights a market failure rationale including references to viability gap (see principle 2 below) but there is no evidence of market testing (eg. advertising the development to the market to seek interest and proposals from a number of developers) which is understandable given the site is currently privately owned.

We do not anticipate it will be hard to find suitable public policy imperative for supporting the proposed intervention, however, it will need to be articulated and defined carefully, particularly since the proportionality of the public support addressed below depends on this. The overall purpose appears to be to redevelop part of Northampton to create new residential and commercial units to bring jobs into the area. The Council notes that this objective aligns with the Towns Fund, which we explore in more detail below.

The proposed funding originates from Central Government as per the Towns Fund. This is a national fund allocated to particular regions identified as deprived and carrying social inequalities. The fund's objectives are *"to drive the sustainable economic regeneration of towns to deliver long term economic and productivity growth. This will be done through:*

- *Urban regeneration*
- *Ensuring towns are thriving places for people to live and work, including by:*
- *Increasing density in town centres;*
- *Strengthening local economic assets including local cultural assets;*
- *Site acquisition, preparation, remediation, and/or development; and*
- *Making full use of planning tools to bring strategic direction and change*¹⁷.

It is very important however that "the objective" as arrived at here must be sufficiently precise to cover the exact project and costs the subsidy is intended to cover (for which the Council must have its reasons why this is considered a good idea for the general good) and for the same to be met in the short to medium term in the specific manner proposed rather than delayed or diluted. This is because all the subsequent Principles relate back to the specific public policy objective(s) as defined here, so for them to be shown to be suitably respected it is vital each objective is defined fully, properly, and specifically.

2. Subsidies should be proportionate to their specific public policy objective and limited to what is necessary to achieve it

This Principle is normally the key provision as it goes to the amount and the heart of the financial case on the need for intervention. It naturally depends completely on the details of the facts and the costs to be supported and the projections of need from the applicant. This is normally evidenced by a viability gap appraisal and reasonable due diligence from the funder (the Council) to corroborate that the funding is no more than necessary to allow this element of the Project to go ahead on the intended timescale and to the intended specification. This normally relies on a finding that the subsidy is needed in order to close a viability gap to allow the investment to proceed now, based on a minimum expectation of reasonable profit in order to be sustainable.

The Draft guidance provides in paragraph 137

"Public authorities should use the following formula to determine whether the subsidy is just large enough to achieve the required change in behaviour: DRAFT Subsidy Control Act Statutory Guidance 37 Size of subsidy = Cost of project – any benefits to the recipient such as expected increase in profits or decrease in costs after undertaking project."

This suggests a viability gap forecast would be useful in providing evidence of the Principles. The OBC contains a development appraisal which assesses the viability gap at £4.2m (the exact level of the Grant) after taking

¹⁷ Ministry of Housing, Communities & Local Government, Towns Fund Guidance (June 2020) p.9. Accessible here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/926422/Towns_Fund_further_guidance.pdf

into account developer's return on cost of 10% which is regarded as commensurate with the minimum the market would expect to undertake a development of this nature.

Overall, it seems there is evidence to satisfy this Principle, but it is very important that the Council forms a final view as to the appropriateness of the final amount of subsidy requested and records the basis for this decision. We recommend this is initially done via the annexed *pro forma*.

3. Subsidies should be designed to bring about a change of economic behaviour of the beneficiary. That change, in relation to a subsidy, should be (a) conducive to achieving its specific public policy objective, and (b) something that would not happen without the subsidy

This criterion is about the proposed measure needing to be seen to have a behaviour changing effect, and without the subsidy the Project would not be able to proceed in the same way, either at all, or would be delayed, smaller in scale, or with less investment by the beneficiary. It is therefore similar to the general incentive test set out at Article 6.3 GBER (the former EU block exemption).

OBC has provided a baseline scenario of "do nothing" in its comparison of options, thereby arriving at the Project as the preferred option given its most favourable benefit cost ratio. Without the subsidy the site would remain derelict and redundant, with opportunity cost in lost revenue and possible demolition/clearance cost.

Given the scale of the intervention and the anticipated viability gap, this should not be at all difficult to sustain, to the extent that we understand that, without public subsidy, the Project has no apparent chance of happening at all.

The behaviour changing impact of the subsidy is perhaps best demonstrated by viability gap analysis as alluded to in Principle 2. This is normally clear evidence that without the intervention there would be no commercial rationale for the Project. This would demonstrate that "the specific public policy objective" (ie. this part of the Project, and getting it delivered now as specified) would not be achieved without the subsidy, and therefore the proposed measure has a behaviour changing effect. As always, it is important to keep records to corroborate that this has been specifically confirmed (not assumed), including showing how the funding has changed the delivery of the Project.

4. Subsidies should not normally compensate for the costs the beneficiary would have funded in the absence of any subsidy

We interpret this rule to discourage if not prohibit subsidies to projects that have already started and are legally committed (which would be evidence that they would necessarily happen anyway with or without the subsidy). The parallel rule in State aid (which is persuasive only) acts to block projects that have not started as at the time an aid application has been submitted.

In the present case, we understand that not even work on the site preparation has started (NB. preliminary studies and planning are excluded from any understanding of what "starting work" means), hence this should be easy to satisfy.

OBC in options appraisal has considered the "business as usual" scenario which would be academic given the site is redundant. The costs are one off capital costs bench marked as reasonable by external professional advisors and do not contain on going revenue costs which are expected in any event to be met by operating revenues.

Overall, the point of this rule is for the awarding authorities to be satisfied that they are not funding things which are necessarily happening already anyway and we understand this is clear to all as things stand. From the facts, this requirement appears to be easily met but should still be documented by the Council to confirm how it has reached that decision.

5. Subsidies should be an appropriate policy instrument for achieving their specific public policy objective and that objective cannot be achieved through other, less distortive, means

This Principle is about the Council being able to show that other non-subsidy interventions for the purposes of achieving the specific public policy objective were considered, but dismissed in favour of the subsidy option chosen, on the basis only the subsidy option would be likely to be effective. Ultimately, an awarding authority should be able to show here that other forms of intervention were considered but discounted on the basis they would not work, or at least clearly not as reliably.

Another way to look at this would be whether any other means of supporting the objective but without granting subsidy might have delivered the desired outcome. An example of this might have been commercial lending, albeit we would not expect this to have closed the viability gap in the required manner to allow the Project to go ahead (NB. rather it would have extended the gap).

The delivery of the works aims to deliver modern mixed used units to bring jobs and generate social value for Northampton. The subsidy is awarded to specifically enable works to the sites to be delivered and, in reaching the decision to apply a subsidy, the Council has considered alternative options.

Overall, it is for the Council to conclude and demonstrate that the subsidy it is providing has been considered and evaluated as the only effective way to facilitate the objective, presumably on the basis that other methods were not satisfactory for one reason or another. This is normally self-evident when large viability gaps are present but nevertheless we recommend it is carefully documented how the Council may have reached such a conclusion.

6. Subsidies should be designed to achieve their specific policy objective while minimising any negative effects on competition or investment within the United Kingdom

This is the new Principle from the Act. Technically it does not need satisfying for a subsidy award being made now at the time of writing, but since we anticipate there to be several months or longer before the proposed award could be ready to be made, we expect this Principle will be required to have been considered once the time comes, hence it is sensible to plan for it now. It overlaps significantly with the final Principle (below) but since it has been created as a standalone new Principle we believe it will need its own standalone assessment.

This Principle has been introduced purportedly to deal with concerns as to dislocation effects between different parts of the UK and particularly as between different devolved nations. However, it can apply on a more localised level too hence we would not recommend reliance on anything merely concluding no negative effect on Scotland, Northern Ireland and Wales.

We believe that for this Principle to be reliably satisfied will require some form of study of any potential negative effects on competition or investment in the first place. This should then conclude (hopefully) that the negative effects are minimal to begin with, but also what steps have been taken to minimise them. This involves considering basic features of competition economics for the affected relevant markets (ie. shopping and retail spaces of particular capacities and capabilities and within a certain geographic area to be considered substitutable), for example whether sustaining supply like this in Northampton will likely lead to incremental new demand and investment or mere dislocation from existing suppliers in neighbouring areas.

It is likely that significant work will already have been done on this and/or that this will be in train anyway through standard assessments for Green Book principles etc. The effect on competition or investment of a measure will involve assessing what is to be delivered with public support and considering what are the markets for these elements already and how much of a distortion will be created by the intervention.

There will be a wide margin of discretion on conclusions drawn from the evidence but if there is no independent expert study to begin with then it will be much more difficult to defend the Council's decision on this point. From the Council's perspective what it should be looking to do is obtain firm evidence (ie. a study) on this point, to allow the Council to take the safest possible decision.

Ultimately, among the most significant of steps taken to minimise distortion of competition will be to show that the subsidy has been limited as per Principle 2 to the absolute minimum necessary, but we do not recommend reliance on this alone or else there would be no need for this new Principle. Other considerations which could be helpful to show that effects on competition would be minimised would be if there had been negotiations on scope of the Project, for example for the Council to be able to show that it had exercised some thought and discretion in altering scope to limit any potential for distortion of competition resulting.

7. Subsidies' beneficial effects (in terms of achieving their public policy objective) should outweigh any negative effects, including in particular negative effects on (a) competition or investment within the United Kingdom; (b) international trade or investment¹⁸

We believe this Principle overlaps significantly with the aforementioned (new) one and is sometimes compared to the so-called balancing test referred to in EU guidelines and which the European Commission has historically operated when exercising discretion to approve proposed State aid notified to it. The main difference between

¹⁸ This Principle is considered widely to be the most important and requires balancing the pros and cons of intervening in the manner proposed.

new Principle 6 and this Principle is that this one is a yes / no question: ie. do the positives of achieving the objective outweigh negative effects on competition?

The evidence on the negatives should be clear from the study carried out at Principle 6 above. What then matters is setting the positives of achieving the objective against this. Again, the Council will have considerable discretion because the law sets no relative weight on what should be considered more or less important. Any court is unlikely to wish to want to substitute its discretion for that of the public funder at the relevant time. What is important therefore is to be able to show a due process was followed (ie. evidence gathered) and an informed decision taken.

The effect is to require awarding authorities to be satisfied that there is an overall net positive effect to be drawn from a subsidy provided. To arrive at this conclusion safely, in particular given the quantum and importance of the Project, we would recommend some form of study be commissioned to place a comparison against the two elements to be balanced.

We would not expect this to be a problem in the present case in that the funding will be shown to be closing a gap and in so doing funding something facilitating a highly ambitious and transformative investment project for Northampton. Completion of the Project will directly contribute to achieving the policy objective by delivering an economic asset in a previously underutilised site. In addition, the proposed use of the site is also expected to provide employment opportunities for the Northampton area. This demonstrates evidence that the Project will potentially have a wider impact on the surrounding area. When a State support is limited to this sort of intervention then we anticipate that any distortive effects are relatively clearly insufficient to outweigh the positive effects on investment that it will bring.

The OBC has arrived at the Project as the preferred option after considering several other options like "do nothing" and alternative delivery of different scale. It has done so by a technical process assessing the benefit cost ratio. In making this assessment negatives of the Project like displacement, leakage and relocation in relation to surrounding geography and comparable retail /commercial spaces has been made.

Given the strong product differentiation against other retail spaces in the surrounding geographical area the negative effects are regarded as limited meaning the benefits of the Project outweigh them.

OBC also highlights wider benefits which have no numerical value to include in the benefit cost assessment above. These are:

"• Regeneration benefits –. the scale and nature of the scheme will provide transformative regeneration benefits and could have a wider catalytic impact upon Abington Street and Northampton's Town Centre beyond the area of impact assumed from a wider value uplift perspective, by increasing investor and occupier confidence in the area. This could assist, for example, to enhance the town's attractiveness as a residential location to improve demand for town centre living which is a wider key objective of the Town Deal.

- *Construction jobs – although the construction jobs which will be generated by the new development have not been quantified in detail as part of this Economic Case, the development will generate a significant number of new construction jobs during the construction period. It is estimated that it could support a total of c.113 construction job years (or c. 11 FTE jobs based on 1 FTE per 10 construction job years) through the construction period based on the estimated construction costs of c.£8.139m as per the HCA Calculating Cost Per Job Best Practice Note 2015.*
- *Perception and profile benefits – it could assist to enhance the perception, image and profile of the wider town centre offer through the delivery of such a significant scheme to transform the current offer.*
- *Reduced crime/anti-social behaviour – through promoting increased activity within a currently derelict shopping centre, including a day and evening offer, this could assist to improve natural surveillance levels and reduce opportunities for crime locally."*

Ultimately, this Principle is about showing that a sensible judgment has been applied based on a reasonable gathering of evidence, and then applying a reasonable judgment on that evidence.

D.3 Prohibited subsidies and subsidies subject to special conditions via the TCA

We note that the TCA (and in due course the Act) contains some wider assessment criteria which must be worked through.

This includes certain prohibitions on subsidies such as those that are made contingent on the use of domestic over imported goods, or those based purely on export performance. This can only be verified from a view of the grant funding agreement to be used but we have no reason to expect any such prohibited clauses or restrictions from the Council, nor for any of the other special conditions on subsidies from the TCA to be engaged (eg. subsidy for air carriers for the operation of routes; banks, credit institutions and insurance companies; and unlimited state guarantees). The Act adds to these prohibitions, including subsidies causing relocation of activities, but neither this nor any other prohibition in the Act appears likely to cause a difficulty.

We recommend an additional check that the beneficiary (the Council) is not deemed "ailing or insolvent" as at the time of the Grant on the basis this would render the subsidy prohibited unless provided by way of rescue and restructuring (which has its own specific further requirements). On the facts, we see no reason why this requirement should be an issue for the Council.

This bears some similarities with the previous test in GBER not to aid "undertakings in difficulty" but is not the same test. This can be satisfied now with basic checks that the subsidy beneficiary is a going concern, ie. not likely to go out of business in the short to medium term absent the subsidy under consideration. The Act will include a further analysis of the group balance sheet, to conclude that assets exceed liability.

We also note that the energy and environmental principles at Annex 27 of the TCA are not applicable in this instance. These apply in respect of subsidies for electricity generation adequacy, renewable energy and cogeneration. Similar provisions will be set out at Schedule 2 of the Act. Given that the Project does not involve

a subsidy in connection with the the energy market or the environment, these provisions are not engaged here and are therefore mentioned for completeness only.

D.4 Important new procedure emerging from Subsidy Control Act and notifications to the CMA

The Act creates additional classes of subsidy namely Subsidies of Interest ("SoI") and Subsidies of Particular Interest ("SoPI"). These are not defined in the legislation and there was a recent public consultation¹⁹ (closed 6 May 2022) on how this should be set in law²⁰.

The point of being within whatever may be these final classifications is to, respectively: (i) enable a proposed subsidy to be capable being notified to the (CMA in advance of award for a non-binding review, should the parties desire, or (ii) oblige a proposed subsidy to be notified to the CMA in advance of award for a non-binding review, with failure to do so rendering the subsidy prohibited.

As things stand, the public consultation²¹ anticipates that a SoPI will occur for any subsidy in excess of £10m, hence the proposed subsidy to the Project will not qualify, so we mention this now for completeness only. However, this should be kept under review by the Council until the law in this respect is finally clarified.

E. **Avoiding subsidy to third party suppliers and contractors**

The risk of a subsidy arises to such bodies where the remuneration exceeds that which would be provided by the market. Therefore, where the remuneration is set by an open and competitive market process or benchmarked at market rate, it may reasonably be expected that no subsidy arises. We assume that the Project will be undertaken by the Developer following the Council's procurement and value for money processes which should be sufficient. Accordingly, the risk of a subsidy arising to third parties is not expected to arise in these circumstances.

F. **Subsidy Control risk and challenges**

Ignoring the EU/UK international dimension (which we do not consider likely to be triggered in this case), the new challenge regime exists on two levels:

- for acknowledged subsidies granted under the Principles, as here, there are mandatory publication requirements post-award (as here), but short windows for challenge thereafter by specific (subsidy) judicial review, as explained below; and
- for non-subsidy awards there are no such mandatory publication requirements but of course if there is doubt as to the classification of an award as subsidy or not then the failsafe approach is to award as subsidy and publish. In the absence of this there is always a general judicial review risk against any

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063355/ssopi-and-ssoi-consultation.pdf

²⁰ The draft Regulation mentions £5-10m in non-sensitive sectors and £1-5m in sensitive sectors. The Project is expected to be in a non-sensitive sector.

²¹ See [Draft Subsidy Control \(Subsidies and Schemes of Interest or Particular Interest\) Regulations 2022 \(publishing.service.gov.uk\)](#)

decision of a public authority, the time limit for challenging which again flows from the placing of the matter in the public domain. Hence, even in a no subsidy situation it is recommended to place the fact of the intervention in the public domain.

On the present facts, subsidy risk arises first at the level of the funder, in this case the Council which could ultimately be responsible in defending a UK national court²² judicial review action (NB. as noted above we believe the subsidy awarding authority would normally be the Council not DLUHC).

The primary risk, however, is always to the recipient (the Developer) which would be asked to refund the support if found to have been given unlawfully. This is so even though the lawfulness of the decision to award ultimately rests with the public funder. As with EU State aid this cannot be contracted out of, ie. it is not possible for the public funder to indemnify against the chances of an adverse subsidy ruling without thereby creating another subsidy.

Given the competitive market that could be affected, we cannot rule out the possibility of disaffected interested parties being willing to challenge (NB. the risk is normally minimised if there is a lot of advance publicity to flush out would-be challengers at an early stage).

In the present case, the Project involves apparent subsidy needing to go under the Principles so will need to be the subject of a minimal transparency publication within six months of award (to be reduced to three in due course by the Act). Only once the publication has been made and the challenge periods passed may it be safely concluded as beyond challenge.

Article 369 TCA imposes the basic transparency obligation on public authorities awarding a subsidy, namely that within six months of an award they publish on an official website²³ the following minimum information:

- legal basis and policy objective or purpose of the subsidy;
- name of the recipient of the subsidy when available;
- the date of grant of the subsidy, the duration of the subsidy and any other time limits attached to the subsidy; and
- the amount of the subsidy or the amount budgeted for the subsidy.

The Act proposes slight but not significant variations on this and accordingly this will need checking in due course.

²² The secures that future subsidy challenges will be heard at the Competition Appeals Tribunal (rather than the standard High Court).

²³ The national database for this has now been launched at <https://searchforuksubsidies.beis.gov.uk/> and log in codes can be obtained from subsidycontrol@beis.gov.uk. It is not yet mandatory to publish within this forum rather than (for example) on the funders' official websites, but it would certainly be considered best practice at this time to use the national database and the Subsidy Control Act envisages that this will be mandated in due course.

It is the transparency publication which sets off the time limits for challenge under judicial review, which are one month from publication. If details for how an authority satisfied the Principles are requested within that first month, then a challenge may be lodged within a further one month of receipt of those details from the authority (noting that an authority has 28 days within which to answer such requests). It follows from the above that the sooner the publication is made, the sooner time starts to run and the potential risk period for a challenge will pass.

If awarding acknowledged subsidies under the Principles the "bottom line" is that to be safe in the award it is vital for the awarding authority to be able to demonstrate it has reasonably concluded satisfaction with all the Principles. It is also vital to keep records for how they have been deemed to have been reasonably satisfied (hence the recommended *pro forma*). This is because:

- this forms the substance of the primary defence against an action for judicial review by an interested party (eg. a competitor or anyone else claiming to be affected by the Project²⁴);
- it is a new and further TCA requirement that evidence of compliance with the Principles is produced to interested parties requesting it within 28 days of request following publication (see above); and
- the *pro forma* will assist in answering any further questions as may arise either from Central Government or any other source.

To conclude, there is always a risk of challenge under any analysis, and the way to protect against this is to ensure the basis for award under the Principles has been soundly thought through to begin with (with due attention to evidence trail) and then for the fact of the award to be made public. This way time, can be shown to have started to run and (hopefully) a line can be drawn under the risk within a maximum of three months thereafter, assuming no challenge is forthcoming.

We hope the above is useful but please let us know if you would like further explanation as to how Subsidy Control enforcement can manifest itself.

Concluding remarks

As discussed above there seems to be good prima facie evidence, from the OBC in particular, to suggest that the Grant may be awarded lawfully and therefore as per new UK Subsidy Control. This will require further attention to detail prior to the Council taking a final decision on the award and then implementing it via suitable grant funding agreement, but the signs are positive. Clearly it will be necessary to confirm the identity and make up of the Developer and subject the relevant entity to due diligence against the proposed costs and confirmation of the evidence in the OBC. Once all that is confirmed and the grant funding agreement entered into, the final act will be making a suitable publication notice as described above. Please let us know if you have any further

²⁴ This is set out in Article 369 TCA, whereby an interested party means any natural or legal person, economic actor or association of economic actors whose interest might be affected by the granting of a subsidy, in particular the beneficiary, economic actors competing with the beneficiary or relevant trade associations.



questions on this. at all stages it is important to keep records for the decisions made, particularly as to compliance with each of the Subsidy Control Principles.

Lastly, for avoidance of doubt this opinion is for the benefit of West Northamptonshire Council only and may not be relied upon by third parties without the express consent of West Northamptonshire Council and DWF Law LLP.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Branton', written over a light grey horizontal line.

Jonathan Branton
Partner
DWF Law LLP

Alex Eaton
Solicitor
DWF Law LLP



WEST NORTHAMPTONSHIRE COUNCIL CABINET

11 July 2023

**Cabinet Member for Environment, Transport, Highways and Waste:
Councillor Phil Larratt**

Report Title	Procurement of a new Strategic Transport Model
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Report Author	James Povey, Transport Strategy and Development Manager, james.povey@westnorthants.gov.uk
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List of Approvers

Monitoring Officer	Catherine Whitehead	21/06/2023
Chief Finance Officer (S.151)	Martin Henry	21/06/2023
Head of Communications	Becky Hutson	21/06/2023

List of Appendices

None

1. Purpose of Report

- 1.1. To update Cabinet on the status of the Northamptonshire Strategic Transport Model, seek approval to undertake a procurement for the rebuild of the model in partnership with North Northamptonshire Council and to agree its funding. The rebuilt model will increase opportunities for successfully bidding and securing Government and developer funding and ensure the authority can plan and implement appropriate highway and transport schemes in the coming years.

2. Executive Summary

- 2.1 The Northamptonshire Strategic Transport Model (NSTM) is Northamptonshire's traffic model, which can be used for testing development proposals, providing an evidence base for spatial strategies, transport policies and major highway schemes. To ensure that they are representative, such models only have a limited life before new survey information and planning data is needed, and the model rebuilt.
- 2.2 Developed in 2008 by the former Northamptonshire County Council, the NSTM was last rebuilt in 2015. The NSTM has proven a robust basis to assess development impacts upon the road network and secure funding for proposed road infrastructure schemes.
- 2.3 The NSTM has not been significantly updated since 2015 and the age of the model, its assumptions and underlying data means the validity of model outputs could come under scrutiny for future assessment where:
- Government funding is required for a major scheme.
 - The model is supporting potentially contentious planning policy that requires public scrutiny and formal examination.
 - There are traffic impacts arising from planned development anticipated on the local and Strategic Road Network (National Highways).
- 2.4 The Northamptonshire model is now due a rebuild, having reached the end of its current validity, both practically and according to government guidance. An update will ensure that the NSTM is still relevant, robust and continues to be fit for appraising policies, transport improvements and development schemes.
- 2.5 Following consideration of a range of options, it is recommended that the NSTM be rebuilt in partnership with North Northamptonshire Council and upon completion each authority will operate and own its own copy of the model. This allows each authority to control access to the model, run individual scenarios and maintain appropriately.
- 2.6 In March 2020, Northamptonshire County Council approved the allocation of £400,000 of Section 278 reserves towards the update of the model. This funding will be supplemented by £78k of funding each from both North and West Northamptonshire from fees charged to developers using the model. Funding will be provided on an equal share basis.
- 2.7 The first stage of the commission to be funded will be for the model build and future reference case scenario. This will cost in the region of £500,000. The contract will also cover the future model hosting, maintenance and operation. The costs for this could take the value of the overall contract up to £2m, and this will be funded separately through a combination of third party charges, model access fee income and separate project budgets across the Place Directorate.

3. Recommendations

- 3.1 It is recommended that the Cabinet:
- a) Agree to working in partnership with North Northamptonshire Council to update and rebuild the Northamptonshire Strategic Transport Model
 - b) Agree to West Northamptonshire Council being the lead procuring authority.
 - c) Agree £78k of existing model fee income towards the development of the Northamptonshire Strategic Transport Model, alongside the £400k already set aside by both councils, and an equal contribution of £78,000 from North Northamptonshire Council.
 - d) Agree to delegate authority to Director of Place, in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste, the S151 Officer, the Monitoring Officer and the Portfolio Holder for Finance, to take any further decisions and/or actions required in connection with the procurement and award of the Northamptonshire Strategic Transport Model contract, without the need to return to the Cabinet.
 - e) Note West Northamptonshire Council will retain ownership and ongoing management of its own independent version of the Northamptonshire Strategic Transport Model.

4. Reason for Recommendations

- The recommended course of action is the most cost-effective. Unlike the other options considered, the joint revalidation of the NSTM produces financial, time and resource efficiencies whilst allowing each authority to retain future exclusive use of the model.

5. Report Background

- 5.1 The Northamptonshire Strategic Transport Model (NSTM) is key to developing the evidence base for spatial strategies, transport policies and improvements, and support for business cases. The NSTM is a strategic multi-modal model (effectively a computer simulation of the transport network) covering Northamptonshire capable of assessing the impacts of future changes in travel demand and transport provision within Northamptonshire.
- 5.2 The NSTM is an industry-standard computerised model that was built in 2008 and rebuilt in 2015. The rebuild took account of significant changes to the highway network around Northampton and was supported by updated count data. The existing NSTM has been used to assess a wide range of policies and schemes for example; the Development Plan, the A43 improvements as well as assessing a significant number of development sites and their impacts upon the road network.
- 5.3 The base year data is now more than seven years old with previous Department for Transport, Transport Appraisal Guidance (TAG)/Design Manual for Roads and Bridges (DMRB) guidance recommending a six-year data source age limit. TAG Unit M2.2 (May 2020) frequently references age of data as a potential limitation, dependent on the levels of change in travel demands over the intervening period.
- 5.4 The age of the model and underlying data means the validity of model outputs could come under scrutiny for future assessment where:

- Government funding is required for a major scheme.
- The model is supporting potentially contentious planning policy that requires public scrutiny and formal examination.
- There are traffic impacts arising from planned development anticipated on the local and Strategic Road Network (National Highways).

5.5 The model rebuild updates underlying travel demand data, and the transport network available (recognising any changes since 2015). The new model will have a new 2023 base year informed by new travel pattern and demand data, which will be validated using traffic count data. The pandemic created significant changes to travel patterns with the authority unable to develop a reliable base year. A future forecast year of the model will then be developed informed by known transport improvements, new developments and travel demand changes. A number of reports will be produced as part of the commission providing a valuable evidence base.

5.6 The NSTM will be used to support the development and implementation of the Local Plan and the Local Transport Plan. Both policies will be developed and assessed through 2023 and into 2024. The model will also support major scheme business cases for transport infrastructure funding to Government and will also be important for the effective assessment of large new development applications and substantiating the transport improvements required to mitigate their impact.

5.7 In March 2020, Northamptonshire County Council considered and approved the rebuild and funding of the NSTM from Section 278 reserves (£400,000) and from fees charged to developers using the model. Given the challenges of the pandemic and the instability of travel provision and demand this work was not progressed.

5.8 It is considered appropriate to follow this funding model; utilising the £400,000 secured and fee income from both North and West Northamptonshire. Given both authorities hold a similar need for a validated model particularly for the Local Transport Plan and the Development (Local) Plan an equal contribution from fee income is appropriate. As such each authority will contribute £78,000 towards this work, creating a total budget of £556,000.

5.9 The first stage of the commission to be funded will be for the model build and future year reference case scenario. This will cost in the region of £500,000. The contract will also include the model hosting, maintenance and operation for the life of the model, so the initial contract length would be for 8 years. The costs for this could take the value of the overall contract up to £2m based on past experience, and this will be funded separately through a combination of third party charges, model access fee income and separate project budgets across the Place Directorate.

6. Issues and Choices

6.1 The NSTM was built in 2008 and rebuilt in 2015 by the former Northamptonshire County Council. The NSTM has reached the end of its life and since the creation of both authorities in 2021 much consideration has been given to how to provide modelling assessment requirements.

6.2 The NSTM has proved to be a valuable source of evidence and a renewed version is expected to remain so in future years. Options considered, alongside the benefits and constraints are set out below;

- Option 1 - Both authorities develop strategic transport models based on the NSTM
- Option 2 - One authority rebuilds the NSTM, with the other paying for use and access to the model
- Option 3 - The model is not rebuilt
- Option 4 – The NSTM is rebuilt jointly, with each authority managing its own version to enable future access, usage and control.

Option	Positive	Negative	Recommendation
1	<ul style="list-style-type: none"> • Maintain individual ownership and control • Establish individual charging models for third party access to the model 	<ul style="list-style-type: none"> • More expensive for rebuilding the model and its ongoing maintenance. Establishment costs of two models is likely to be double the cost of a county wide option. • Potential for the two models to have different assumptions or forecasts complicating any cross-border assessments 	This option is not recommended
2	<ul style="list-style-type: none"> • Clear lines of ownership, single point of contact • Lead authority could establish and update charging model • Regional model would support cross border assessments 	<ul style="list-style-type: none"> • Lead authority takes all the risk • Loss of control of access and unclear future costs for non-lead authority • Funding model for access uncertain 	This option is not recommended
3	<ul style="list-style-type: none"> • S278 funds could be redirected to alternative uses 	<ul style="list-style-type: none"> • The council wouldn't have a valid method of accessing schemes, large development proposals and policies which would limit access to funding, weaken effective development management and reduce planning capabilities. 	This option is not recommended
4	<ul style="list-style-type: none"> • Allows the council full and direct access to the model. • Costs and risks shared. • Continues to allow the authority to charge for 	<ul style="list-style-type: none"> • The councils would need to agree governance arrangements, approach to model rebuild as well as technical assumptions and requirements. 	This option is recommended

	<p>access to the model to third parties.</p> <ul style="list-style-type: none"> • Likely to be most cost-effective approach in terms of model build, maintenance and management cost, as well as officer/project team resource requirements • Supports cross border assessments 	<ul style="list-style-type: none"> • Need to agree third party fee models. 	
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- 6.3 The delivery routes (including the procurement options) were subject to a SWOT analysis considering a breadth of issues around affordability, deliverability and flexibility; as well as both value for money and potential risk.
- 6.4 A joint or regional approach to modelling is not unusual allowing for wider network consideration as well as the cost and resource benefits. However, it is necessary for one authority to be the lead authority, responsible for the procurement of the consultants to undertake the work. It is proposed that the model rebuild is progressed jointly with West Northamptonshire Council the lead procuring authority. With arrangements in place to ensure that North Northamptonshire Council is involved in the governance of the scheme.
- 6.5 The model rebuild will be procured via a competitive process with a national framework, such as the Crown Commercial Services and ESPO. This will ensure best value. Use of such a framework will also reduce risk, and the input required from our legal services compared to an open tender procurement. Use of a framework would also save some time on the commissioning process. Despite the procurement being led by West Northamptonshire Council, both authorities will establish a contract with the appointed consultancy securing individual versions of the model as well as establishing a direct relationship with the appointed consultancy. Once the model is built, each authority will manage access to their version, with any model work by one council being independent of the activity of the other. Provisions within the contract will ensure that if a change within one model is agreed, then it can translated into the other cost effectively.
- 6.6 Given the specialist nature of the work, and to enable the management of this work, it is proposed that a consultant with specialist modelling knowledge is appointed to work on behalf of both councils and will be part of the joint project team managing the update of the model.
- 6.7 Assuming the approval of this report, we will commence procurement of NSTM rebuild. The procurement will also include the ongoing hosting of the model, its management, maintenance and operation of the model for both authorities for their lifetime (approximately 7 years)."
- 6.8 The model will require current traffic survey data to be collected in neutral months (to avoid seasonal effects), therefore this work will be undertaken in Autumn 2023 through each authorities term contract.

- 6.9 The model development, report and forecasts are anticipated to be completed in late Autumn 2024.
- 6.10 An Equality Screening Assessment of this proposal has been undertaken and concluded the scheme has no impact on the protected groups.

7. Implications

7.1 Resources and Financial

- 7.1.1 In March 2020, Northamptonshire County Council approved the allocation of £400,000 of Section 278 reserves and fee income to update of the NSTM. Given the challenges of the pandemic this work was not progressed.
- 7.1.2 Whilst the £400,000 remains committed, both North and West Northamptonshire Councils have identified fee income that can further support this work, this funding will be provided on an equal share basis. Both North Northamptonshire Council and West Northamptonshire Council have each identified £78,000 of NSTM fee income towards this work.
- 7.1.3 It is proposed that the project also funds a consultant with specialist modelling knowledge to be appointed to work alongside this procurement on behalf of both council's and will be part of the joint project team to ensure the works for each party, remains on budget and on time.
- 7.1.4 The model rebuild, associated data gathering and consultant project team support will be delivered within the funding identified above. The costs of ongoing maintenance costs will be funded by fees secured from third party access to the model as happens currently, with any surplus retained for future model revalidations and rebuilds.

7.2 Legal

- 7.2.1 The Northamptonshire Strategic Transport Model (NSTM) is Northamptonshire's traffic model which has not been significantly updated since 2015. Once approved, The NSTM will be used to support the development and implementation of the Local Plan and the Local Transport Plan. Production of a Local Transport Plan is a statutory requirement under the Transport Act 2000 and Local Transport Act 2008.
- 7.2.2 The NSTM will support major scheme business cases for transport infrastructure funding to Government. It will also be important for the effective assessment of large new development applications and substantiating the transport improvements required to mitigate their impact which, in turn, can affect planning obligation requirements secured under s106 legal agreements.
- 7.2.3 To date, legal advice has not been sought for the NSTM proposals as it is a reprocurement of an existing asset/service. If the NSTM proposals are agreed legal advice may be required in relation to the relevant contract procedure.

7.3 Risk

7.3.1 There is a risk that if the model isn't updated and the evidence base for the Council's policies do not meet requirements, the council may be unable to demonstrate it's policies are sound. This in turn would impact on the implementation of these plans and inhibits access to funding for delivering transport infrastructure schemes. Furthermore, the council may face difficulties resisting development proposals that come forward outside its Local Plan, and also face difficulties substantiating planning obligations associated with transport improvements.

7.3.2 A risk register has been developed as part of the project management process and will ensure risks are identified, recorded and monitored. This will be updated with the model rebuild contractor when they are appointed.

7.4 Consultation and Communications

7.4.1 No formal consultation has been undertaken or is required on this proposal. Communications activity will support the various future stages of procurement process.

7.5 Consideration by Overview and Scrutiny

7.5.1 Any requests from the Scrutiny Commission will be responded to, and formal engagement or presentations required will take place.

7.6 Climate Impact

7.6.1 The updated NSTM will include an emissions module which can utilise information exported from the traffic model to produce emission outputs supporting the development of air quality assessments and reporting to inform carbon impacts in decision making. This will provide a valuable evidence base to test how effective our plans for transport decarbonisation will be.

7.7 Community Impact

7.7.1 The updated NSTM will support effective policy and decision-making, and scrutiny, making a significant difference to the delivery of transport infrastructure and services and therefore have an equally significant impact on the local communities.

8. Background Papers

8.1 None



WEST NORTHAMPTONSHIRE COUNCIL CABINET

11th July 2023

Councillor Phil Larratt
Portfolio Holder for Environment, Transport, Highways and Waste

Report Title	Proposed Changes to the Home to School Transport Policy
Report Author	Tom Callaghan, Head of Transport Delivery

List of Approvers

Deputy Monitoring Officer	Sarah Hall	03/07/2023
Chief Finance Officer (S.151)	Martin Henry	30/06/2023
Other Director	Stuart Timmis	30/06/2023
Communications Lead/Head of Communications	Becky Hutson	30/06/2023

List of Appendices

- Appendix A - Consultation Summary Report**
- Appendix B - Geographically Associated Schools**
- Appendix C - Spare Seat Scheme**
- Appendix D - Suitable Walking Route Criteria**
- Appendix E - Home to School Transport policy Academic Year 2024-2025**
- Appendix F - Transitional Arrangements**

1. Purpose of Report

- 1.1. To share and consider the findings of the recent consultation on the proposed changes to the Home to School Transport Policy and associated supported documents.
- 1.2. To seek approval by Cabinet for the implementation of the new Home to School Transport Policy and supporting documents that include the changes being taken forward after the recent consultation. The new policy will take effect at the beginning of the academic year starting in September 2024.
- 1.3. To seek delegated authority to allow the Executive Director of Place, Economy and Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste to make any adjustments to the policy which are necessary to ensure it remains compliant with legislation and Statutory Guidance issued by the Department for Education.

2. Executive Summary

- 2.1 This report outlines the results of the recent public consultation on the proposed changes to the Council's Home to School Transport Policy.
- 2.2 This report sets out the recommended changes to the policy, the potential impact of these and the mitigations the Council will provide.
- 2.3 The changes being proposed are to help meet the increased demand and operating costs the service has experienced over the last 2 years, whilst at the same time attempting to create a fairer system and exploring opportunities to give greater flexibility for parents, support our young people's independence and help to promote sustainable travel. The proposals will also help simplify the policy and make it clearer for parents and schools as to the criteria for entitlement to free home to school transport.
- 2.4 Formal public consultation on the proposed changes to the policy commenced on 31st March 2023 and closed at midnight on Tuesday 30th May 2023. There were 1460 online responses to the questionnaire through the council's consultation platform and a copy of the report is attached at Appendix A.
- 2.5 The changes to the policy following the consultation are summarised below:
 - 2.5.1 Spare Seat Scheme

This affects students who are not entitled to transport under the policy that currently apply for a seat on one of our existing contracted services and who are then guaranteed transport. This provision will be replaced and instead, there will be a requirement to apply for a seat under the new Spare Seat Scheme, which does not guarantee transport. Transitional arrangements will be put in place for those who are currently making use of the existing scheme.
 - 2.5.2 Provision of free transport to linked schools

The current policy makes provision for free travel assistance to a child's nearest or linked school however, the Council only has a legal duty to transport a child to their nearest suitable school

with places available. Following consultation, and the findings from the EqIA, it is proposed that this provision will largely remain within the policy. The current list of linked schools for transport purposes will be defined and referred to as 'Geographically Associated Schools'. The new policy refers to Geographically Associated Schools rather than linked schools. This is to safeguard against any future liability being placed on the Council if a school decides to link itself to a new village or location. The list of Geographically Associated Schools will remain unchanged unless any proposed changes are approved by Cabinet.

2.5.3 Regular Review of Provision of Transport for Rising 8's

Under both the current and the new policies, the entitlement to free travel assistance changes when a child turns 8 years old as the statutory walking distance increases from 2 to 3 miles. Periodically the Council will review entitlement for these children and the proposal is that this will become a scheduled task at regular intervals throughout the academic year. This is an operational change, not a policy change.

2.5.4 Removal of Transport for Children Under 5 (mainstream only)

The current policy provides discretionary travel assistance to children in reception class. The Council proposed to remove this discretionary travel assistance for mainstream pupils below the statutory age for education (those in Reception Year who have not yet turned 5 years). Following the consultation this proposal has been removed and the current provision will continue.

2.5.5 Removal of Travel Assistance for Year 11 Pupils who move home during the academic year.

Currently where a family move home during year 11, and their current school is no longer deemed their nearest or linked, the Council will consider providing travel assistance to support the student in completing their GCSE's. This discretionary provision will be removed unless the house move is necessitated by an emergency such as a house fire or due to domestic abuse.

2.5.6 Review of Suitable Walking Route Criteria

The current walking route criteria is not clear and can be confusing for parents. The Council has simplified this at the same time as ensuring that the safety of school children is maintained at all times.

2.5.7 Increase the Cost of Non-entitled Bus Pass

The contribution towards the financial costs incurred by West Northamptonshire Council in providing transport to children who are not entitled to transport under the policy will be increased. The current policy provides discretionary travel assistance to non-entitled children at a cost of £600 per annum and this will increase this to £1,000 from September 2024 which more accurately reflects the actual cost of providing a seat for a non-entitled mainstream student.

3. Recommendations

3.1 It is recommended that the Cabinet:

- a) Approve the changes to the Home to School Transport Policy outlined in Part 6 of this report and the resulting new Policy and supporting documents.
- b) Approve the implementation of the changes proposed in Part 6 of the report and apply those changes from the beginning of the academic year starting in September 2024.
- c) Approve the list of 'Geographically Associated Schools' attached in Appendix B which will be used by the Council to determine entitlement to free home to school transport to schools which are not a child's nearest. The list will apply from the beginning of the academic year starting in September 2024.
- d) Provide delegated authority to the Executive Director of Place, Economy and Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste to make any adjustments to the policy which are necessary to ensure it remains compliant with legislation and Statutory Guidance issued by the Department for Education.

4. Reason for Recommendations

- To demonstrate how the Council will meet its statutory obligations in relation to the provision of Home to School transport. The current policy includes enhanced arrangements over and above the Council's statutory duty.
- The current policy has not been reviewed in over 10 years and during this time most schools within West Northamptonshire have moved to academy status and are no longer under local authority control. As a result, the current policy and the associated enhancements need to be reviewed and updated to ensure the policy is clear for parents and carers.
- The changes are proposed in order to meet increased demand and operating costs that the service has experienced over the last 2 years, whilst at the same time attempting to create a fairer system and exploring opportunities to give greater flexibility for parents, supporting young people's independence and helping to promote sustainable travel.

5. Report Background

- 5.1 The home to school transport service is a statutory (legally required) service. West Northamptonshire Council currently supports nearly 6,000 children and young people by transporting them to and from school each day. The operation of this is complex and involves nearly 500 transport routes, supported by over 100 transport providers ranging from bus and coach companies to local taxi services. We are legally required to provide home to school transport for pupils of compulsory school age (5 years to 16 years of age) if:
- i. The child is below the age of 8 and is attending their nearest suitable school which is over 2 miles from their home address
 - ii. The child or young person is aged 8 to 16 and is attending their nearest suitable school which is over 3 miles from their home address

- iii. The child or young person is aged 8 to 11 and is attending their nearest suitable school which is over 2 miles from their home address and is from a low-income family (for example, in receipt of free school meals)
- iv. The child or young person is aged 11 to 16 and is attending one of their three nearest schools between 2 and 6 miles from their home address, and is from a low-income family (for example, in receipt of free school meals)
- v. The child or young person is aged 11 to 16 and is attending a school between 2 and 15 miles from their home address where this is the nearest school preferred on the grounds of religion or belief, and is from a low-income family (for example, in receipt of free school meals)
- vi. The child or young person is attending their nearest suitable school which is below the statutory walking distance but due to their special educational needs or disability, they cannot reasonably be expected to walk to and from school
- vii. The route has been assessed by the Council as unsafe to walk even when accompanied by an adult

5.2 The current Home to School Transport policy has recently been reviewed and this concluded that the Council is not consistent with other similar local authorities in terms of the level of support it provides. The Council is also aware that the way in which we provide travel assistance has changed and we are currently providing transport for a number of sole occupancy journeys, many of which require the support of a passenger assistance.

5.3 The review also identified that the Council is providing an enhanced level of provision above and beyond our legal requirement (statutory duty), for example, we provide a subsidised concessionary seats scheme to some pupils who do not meet statutory eligibility criteria for free transport. We are proposing to amend this and ensure that West Northants residents only fund the legal requirements rather than subsidise the cost of travel for children that are not legally entitled to support.

5.4 We also have a lower take up of personal travel budgets which can enable families to make their own transport choices for their child which can sometimes lead to the best outcomes.

6. Issues and Choices

6.1 Proposal 1: Removal of the current non entitled scheme and replace with new Spare Seat Scheme.

6.1.1 Under the currently discretionary scheme, parents of non-entitled students who apply for transport by the third Friday in May each year are guaranteed a seat on one of our existing contracted services. Proposal 1 is to withdraw the provision of a guaranteed seat and instead parents and carers will be required to apply for a seat under the Council's new Spare Seat Scheme.

6.1.2 The new Spare Seat Scheme will mean that parents are no longer guaranteed a seat as these will only be offered where the Council has spare capacity available on its existing contracted services.

As a result capacity will be limited and therefore applications for spare seats will be prioritised in the following order:

Non entitled children with special educational needs or disability

Looked After Children or former Looked After Children who have been adopted

Children of Armed Forces personnel, in line with our duty as part of the West Northamptonshire

Armed Forces Covenant

Siblings of eligible students travelling on the same route

Non-entitled mainstream children

- 6.1.3 The students who currently utilise this scheme are not entitled to free transport and in most cases this is due parents or carers exercising their right of parental preference and choosing a school which is not their nearest. In these circumstances the Council does not have a duty to provide free transport and therefore is currently procuring additional vehicles and capacity to accommodate this additional demand. Whilst parents and carers are required to pay a fee for the use of this service, this does not cover the entire cost including the additional resources which are needed to manage this discretionary service.
- 6.1.4 The Council is also concerned that there is currently a shortage of operators and qualified drivers in the local market to accommodate our current demand for services and this is having a direct impact on our costs which have increased significantly since the Covid 19 Pandemic. By reducing the demand for services from the bus, coach and private hire sector, this will help safeguard sufficient capacity to meet our statutory duty.

Impact and Possible Mitigations

- 6.1.5 There are currently 144 Mainstream and 24 SEND students using this facility who could be negatively impacted if the proposal is implemented.
- 6.1.6 As shown in the consultation feedback in Appendix A, a total of 49% respondents disagreed with the proposal, with 36% strongly disagreeing. In terms of other feedback, there were some comments requesting that 'siblings' be ranked higher in the order of priority and that now children are required to remain in education or training until the age of 18, the Council should adopt a uniform approach and be fair to all students in full time education.
- 6.1.7 Although students are now required to continue in education or training until the age of 18 years, the statutory leaving age remains unchanged at 16 and therefore Local Authorities have no statutory duty to provide transport for non-entitled and Post 16 students. Local Authorities have instead a duty to publish a "transport policy statement" each year, setting out how they will support 16 – 19-year-olds to access education and training. The Council will be undertaking a separate consultation on its revised Post 16 transport policy statement later in the financial year.
- 6.1.8 The Equality Impact Assessment undertaken for this proposal has identified that there may be an adverse impact on existing mainstream and SEND children of statutory school age using the scheme. To mitigate the impact of this change, students who are currently guaranteed transport under the current non-entitled scheme will continue to be guaranteed a seat until they either

cease attendance at their current school or when they complete Year 11, whichever is sooner. The Council has created a substantive legitimate expectation to those currently receiving transport that this would continue, therefore it is not considered appropriate to withdraw it at this stage.

6.1.9 In terms of the order of priority for the spare seat scheme, this has been amended in light of the consultation feedback and no longer includes Post 16 students. This is because the Council already has in place a specific Post 16 Transport Policy for these students which will be subject to a separate consultation later this financial year.

6.1.10 The new Spare Seat Scheme can be found in Appendix C.

6.2 Proposal 2 – Provision of Free Transport to Linked Schools

6.2.1 Parents and carers currently have the right to express a preference as to which school their child attends when applying for a school place. All councils have a legal duty to provide free transport to a child's nearest school with places available when the relevant distance criteria are met, however WNC's current policy provides an enhancement to this and includes free travel assistance to a child's nearest or linked school.

6.2.2 This enhancement was put in place when schools were under local authority control and prior to the advent of academies and was used by the former Northamptonshire County Council to help distribute student school places to relieve pressure on oversubscribed schools, and support those schools who were under subscribed, by including the provision of free transport.

6.2.3 Academies can set their own admission criteria and are no longer under local authority control. This means that a particular school/academy can now determine the towns and villages they will prioritise through their admissions criteria without regard to other schools, whether they are over or under subscribed. This can provide an unfair advantage as some parents are able to receive free transport to a preferred school which is not their nearest, which can then limit places for children where the same school would be their nearest.

6.2.4 Therefore, the inclusion of 'linked' schools in the Transport Policy is no longer applicable for the purpose it was originally intended.

Impact and Possible Mitigations

6.2.5 The proposal that was subject to public consultation was to remove the provision of free transport to all Linked Schools however the feedback received showed a significant level of objection with a total of 78% (785 respondents) disagreeing with this proposal, with 63% strongly disagreeing. Many respondents commented that the proposal would cause significant disruption and would negatively impact on students' education and wellbeing. There was also a strong sense of feeling that this could impact rural areas and that the social impact will divide children and communities. Further comments are included in the consultation report attached at Appendix A.

- 6.2.6 The Equality Impact Assessment identified that the proposal could also have a disproportionate impact on families residing in more rural areas with younger children having to attend a different school to their older sibling.
- 6.2.7 As a result of this impact, the Council will continue to provide free home to school transport to a child's nearest or Geographically Associated school where this is over the statutory walking distance, or where the walking route is deemed unsuitable.
- 6.2.8 In order to prevent any future confusion between the Council's Home to School Transport Policy and the Schools Admissions criteria, the term Linked Schools has been replaced by Geographically Associated Schools in the new Home to School Transport Policy.
- 6.2.9 The list of Geographically Associated Schools is the list of schools that are currently linked schools and can be found in Appendix B. It is intended that from this point onwards this list will largely remain static.
- 6.2.10 Any school that is not included in the list will be able to make a formal request to the Council for their school be included in the Geographically Associated list. Any decision to include this school would be subject to Cabinet approval so that any impacts on other schools or on the Council's budget can be fully considered.

6.3 Proposal 3 – Regular Review of Provision of Transport for Rising 8's

- 6.3.1 Under the current policy, the transport team periodically reassess those children who turn 8 to establish whether they are still eligible to receive travel assistance based on the distance they live from their school. At age 8, the statutory walking distance changes from 2 miles to 3 miles and therefore some children in receipt of free transport may no longer be entitled.
- 6.3.2 This is not a change in policy and is something the Council previously did on a more regular basis prior to the Covid 19 pandemic. The proposal therefore is to re-introduce this and carry out an appraisal at certain periods during the academic year.

Impact and Possible Mitigations

- 6.3.3 The impact of this proposal has been assessed and there are currently 19 students in the current academic year that would be re-assessed for entitlement to free transport. From the consultation feedback, a total of 39% of respondents disagreed with this proposal with 23% strongly disagreeing.
- 6.3.4 Many of the respondents who disagreed with the proposal raised concerns over children's welfare and safety and that it was unreasonable for children to walk this distance. However the distances proposed remain as laid out in the Statutory Guidance. There was also concern that having transport withdrawn could be detrimental and unsettling for children. Some also asked that the Council make no changes to the service and that changes to transport entitlement should not happen during the academic year.

- 6.3.5 The EqIA for this proposal identifies 'age' as a characteristic that is most impacted. The number of students who would have their entitlement re-assessed is low and given the proposal is to bring their entitlement in line with that of children in other age groups, the impact is not considered sufficient to require amendments to the proposal. Similarly any disability would be given full consideration to both the child and parents needs in determining whether it would be reasonable to expect them to walk to school. In most cases SEND children are likely to retain their entitlement to free transport due to their needs.
- 6.3.6 In terms of mitigation, the Council will not remove transport entitlement until after the academic year during which the child has turned 8. For example, if a child turns 8 years of age in January 2025, the Council will re-evaluate their entitlement to transport and if the walking route was deemed safe, free transport would not be removed until the end of the academic year the student turns 8.
- 6.3.7 Parents and carers will have the right to formally appeal any decision to withdraw transport and the current appeal process is not changing. Parents and carers will also have the option to apply for a seat under our spare seat scheme.

6.4 Proposal 4 - Removal of Transport for Children Under 5 (mainstream Children Only)

- 6.4.1 The current policy provides discretionary travel assistance to children in reception class which the Council does not have a legal duty to provide. The public consultation on the proposed policy changes included the removal of this discretionary travel assistance (i.e., free transport) for mainstream pupils below the statutory age for education (those in Reception Year who have not yet turned 5 years). This would not have applied to children who have a special educational need or disability.
- 6.4.2 Legally parents are not required to send their child to school until the term after their 5th birthday and there is no statutory duty for the Council to provide transport, therefore attending reception is a parental choice.

Impact and Possible Mitigations

- 6.4.3 Feedback from colleagues within Education teams highlight the importance of children attending reception as they are taught the phonemes (letter sounds) to match the graphemes (the written letters) and by the end of Reception most children should be able to read and understand simple sentences. It is also important for a child's social and emotional skills as these are developed during Reception year along with their fine and gross motor skills. There are also concerns that missing parts of the school year could have an impact on a child's development.
- 6.4.4 From the consultation responses received, 52% of respondents objected to the proposal with 36% strongly disagreeing. Respondents felt that the proposal would discriminate against low-income families and could result in children effectively not being able to attend reception due to the date at which they turn 5.

- 6.4.5 Other comments refer to the Council's own objectives of children having the best start and that this proposal contradicts this. Feedback from the Northampton Parent Forum Group was that this could also disadvantage children who did have a special educational need or disability as often this is not identified until a child starts reception or year 1. This is because nurseries often do not have staff who are trained to identify this.
- 6.4.6 The EqIA for this proposal does highlight that that low-income families in more rural locations may be disproportionately disadvantaged. There are also valid concerns over the potential loss of learning for reception age children and the longer term impacts of this.
- 6.4.7 As a result of this impact, the Council will not implement this proposal and will continue to provide free transport for children under the age of 5 who are attending their nearest suitable school, where the walking distance is in excess of 2 miles, or where it is less than 2 miles and the walking route is not deemed suitable.
- 6.5 Proposal 5 - Removal of travel assistance for year 11 pupils who move home during the academic year
- 6.5.1 The current policy provides some discretion for year 11 students who move address during their last year of GCSE examinations and are no longer attending their nearest or linked school. The proposal is to remove this discretionary provision unless the house move is necessitated by an emergency such as a house fire or due to domestic abuse.

Impact and Possible Mitigations

- 6.5.2 The Council is currently providing transport for one Year 11 student who has moved home during the academic year. The move was necessitated due to a house fire or domestic abuse and therefore under the new policy free transport would still have been provided.
- 6.5.3 In most cases the decision to move house during a student's final exam year will be planned and it is reasonable to expect that the family would put in place suitable arrangements to allow their child to travel to and from school should they no longer be entitled to free transport.
- 6.5.4 From the consultation feedback received, 57% of respondents disagreed with the proposal with 40% strongly disagreeing. Comments from respondents included concerns over the level of disruption and that it was not clear what constituted an emergency, and that it penalises parents for wanting or needing to move for anything other than an emergency.
- 6.5.5 The Equality Screening Form for this proposal identified that the proposal will ensure that entitlement for Year 11 students will be consistent with that of children in other age groups.
- 6.5.6 Given we currently only transport one Year 11 student then the impact of the policy change will be minimal.
- 6.5.7 Under the new policy the Council will consider each case on its own merits and parents will be able to formally appeal our decision should we decline transport.

6.6 Proposal 6 - Review of Suitable Walking Route Criteria

- 6.6.1 The current suitable walking route criteria has not been reviewed for over 10 years and during this intervening period, some routes have been upgraded and are no longer deemed unsuitable. The proposal is to update the existing walking route criteria as it is not clear and needs to be simplified whilst at the same time ensuring that the safety of school children is maintained at all times.
- 6.6.2 The walking route criteria currently forms an appendix to the existing policy. As part of this proposal, the walking route criteria will be independent of the policy and will be reviewed annually to take account of any changes in legislation or national guidance. It will also provide the opportunity to identify any changes or additions that may result from recommendations of the Transport Appeals Panel.
- 6.6.3 The proposals may result in some existing routes being re classified as suitable and as a result some students who receive free transport may no longer be entitled. It is proposed that the new criteria will be used as a guide for parents and the Council to use when considering if a route is suitable and whether free transport should be provided.
- 6.6.4 Walking to and from school does provide benefits in terms of health, wellbeing and supports independence. The Council will continue to provide transport for children with a disability or mobility problem that makes it difficult for them to walk to and from school. The policy will also provide consideration for parents who have a mobility problem or disability that means they are not able to accompany their child.

Impact and Possible Mitigations

- 6.6.5 From the consultation feedback, 38% of respondents disagreed with 34% supporting it. 16% neither agreed or disagreed and 12% had no opinion.
- 6.6.6 Some of the comments received included the importance of safety for children and that they should feel safe when walking to school and there should be suitable lighting and footpaths. Other feedback included concerns over walking over fields, isolated areas, weather conditions and walking along roads where speeds were high.
- 6.6.7 Some respondents felt that the criteria was not clear whereas others felt it was and that walking and cycling should be encouraged.
- 6.6.8 The Equality Screening Form did not highlight any specific character group that would be adversely impacted by the proposal.
- 6.6.9 In terms of mitigation, the walking route criteria has been amended to take account of concerns raised through the consultation and will now include a commitment that should a parent or carer appeal the decision of the Council to decline free transport on the grounds of the suitability of the walking route, that the route will be formally assessed by an independent Road Safety Specialist and the finding shared as part of the formal Appeals process.

6.6.10 The amended Suitable Walking Route Criteria can be found in Appendix D.

6.7 Proposal 7 - Increase the Cost of a Non-Entitled Bus Pass

6.7.1 Under the existing non entitled scheme, the cost of a bus pass is £600 per academic year which has not been reviewed for over 10 years. The proposal is to increase the cost of a non-entitled bus pass to £1,000 per academic year which better reflects the actual cost of providing a seat to a mainstream learner and will therefore help meet the cost of providing the service.

6.7.2 Local Authorities can apply a charge where the student does not have a statutory entitlement and the increased cost will apply to both mainstream and Special Educational Needs and Disabled students.

6.7.3 The current cost of providing a seat on one of our contracted services for a Mainstream student is £1,040 per academic year. This does not include any other costs associated with the resources needed to administer the scheme or procuring and managing the services used by non-entitled students.

6.7.4 This proposal will also mean that the cost of a seat will be subject to an annual review in line with the Council's wider fees and charges review that takes place as part of the annual budget setting and any change will be publicised and implemented from the start of the next academic year.

Impact and Possible Mitigations

6.7.5 There are currently 144 mainstream and 24 SEND students using this facility who could be negatively impacted if the proposal is implemented. This excludes Post 16 students of which there are considerably more with the majority also paying £600 per academic year for their home to school transport. The Post 16 Transport Policy will be the subject of a separate review and consultation on proposed changes to be carried out later this financial year.

6.7.6 From the consultation feedback, 73% of respondents disagreed with 55% strongly disagreeing with some respondents commenting that the increase is set too high especially in the current financial climate and cost of living increases. A smaller number of respondents that agreed with the proposal commented that the increase should reflect the actual cost. Some also felt that this would penalise rural communities and that maybe the cost increase should be phased and that the cost should be proportionate to the distance travelled. The impact would also be felt worse for those with more than 1 child using the scheme.

6.7.7 The EqIA identified impacts on age, disability and low-income groups and options were explored as to how these could be mitigated which are outlined below. Unfortunately, each of the mitigations considered would have a negative impact on the saving targets that are needed to ensure the Council meets its Medium Term Financial Plan. The Council will however provide parents with flexible payment plans to help spread the cost of a new bus pass.

6.7.8 The charge is applicable to students who are not entitled to free transport, and in most cases, that apply for a seat through the discretionary scheme. These are children who are not attending

their nearest school, but a school which was their parent or carers preference. In many rural areas, where parents decide to send their child to their nearest secondary school, they are likely to be entitled to free home to school transport due to the distance being more than 3 miles or because the route is deemed unsuitable to walk. Therefore, if parents or carers elect to send a child to a school which is not the nearest, then they are responsible for ensuring they can get their child to and from that school. Parents and carers do have a choice and can avoid relying on the Council's non-entitled scheme if they chose their nearest school.

6.7.9 In terms of mitigating the impact of the increase in cost, the Council has considered a phased increase in cost over 2 years. For example, for students using the scheme from September 2024, the cost could be increased to £800, and from September 2025, the cost could then increase to £1,000.

6.7.10 As an alternative option the Council has also considered setting the cost at £800 for students who are currently part of the scheme and not increasing this for the period they attend their current school or until they complete Year 11, whichever is sooner. The new charge of £1,000 would therefore only apply to all new students requesting to join the scheme from September 2024 allowing parents to fully understand the impact of their decision when they are choosing a school place for their child who is starting school from September 2024.

6.7.11 Implementing a phased approach or offering a subsidised rate for existing students, would result in the Service not being able to achieve its Medium Term Financial Plan target for 2024/25. Given there are no suitable alternative proposals available to meet this savings target, the result would be an overspend on the budget and so the original proposal to raise the cost of a non-entitled bus pass to £1000 from the beginning of the academic year commencing in September 2024 will be implemented.

6.8 Other Proposals

6.8.1 As part of the policy proposals the Council is also promoting independent travel training and are currently undertaking a pilot in conjunction with 2 local charities and a local SEND school. The pilot includes the use of virtual reality to help children and young adults overcome some initial fears and help familiarise them with the likely barriers they may face on their journey. Direct accompaniment will then follow, where the child or young adult will be accompanied on their journey until they become confident undertaking this by themselves.

6.8.2 The objective of the pilot is to explore how the Council can assist children and young adults with a SEND to become more independent not only for the purposes of home to school transport but also wider life skills. It will also promote healthy living and seek to improve overall wellbeing.

6.8.3 The Council will also be promoting the use of personal budgets for children entitled to home to school transport which will allow parents to identify the best possible solution to ensure their child arrives at school in the best possible temperament and ready for learning.

6.9 The proposed Home to School Policy can be found in Appendix E.

6.10 The proposed Transitional Arrangements document which includes the proposed mitigations will not form part of the main policy and can be found in Appendix F.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The objectives of the proposed changes are summarised below:

- To help the Council meet the increased demand and operating costs the service has experienced over the last 2 years.
- To provide a more equitable and fairer application of the entitlement to free home to school transport.
- Provide greater clarity and certainty over the criteria that will apply when determining a child's entitlement to free home to school transport.

7.1.2 The total financial savings required from the Service for the financial year 2024/25 is £503k. The increased charges for bus passes will contribute significantly to achieving this.

7.2 Legal

7.2.1 The proposed policy, supporting documentation and Equality Impact Assessments have been reviewed by the Council's legal Services (Pathfinder Legal Services).

7.2.2 Local Authorities must comply with the public sector equality duty under the Equality Act 2010 ('EA 2010'). Local Authorities must consider the potential effect of their transport policy on disabled people, both disabled children and disabled parents alongside other groups with protected characteristics.

7.2.3 Local Authorities need to ensure that their transport policies do not unlawfully discriminate in relation to protected characteristics or contravene the Human Rights Act and also that they comply with the Statutory School Travel and Transport Guidance.

7.2.4 Further, where the Local Authority is exercising a discretion, it needs to ensure that it does not fetter its discretion. Thus, it has to apply the principles of Natural Justice and observe that any process which it follows in reaching its final decision is within the realms of reasonableness, fairness, lawfulness and proper.

7.2.5 Sections 508B and 508C of the Education Act 1996 require Local Authorities to ensure that suitable travel arrangements are made, where necessary, to facilitate a child's attendance at school. Section 508B deals with the duty on local authorities to make such travel arrangements as they consider necessary to facilitate attendance at school for eligible children. Section 508C gives a power to the local authority to provide school transport for any child.

7.3 Risk

7.3.1 Any change to the Council’s policy will give rise to a risk of legal challenge. The changes proposed to the home to school transport policy and the associated Equality Impact Assessments have been reviewed by the Council’s legal advisors and they are satisfied that the Council has met its legal duty in consulting on the proposal, assessing the impact on all groups, and offering mitigations. This will help minimise the risk of legal challenge.

7.3.2 Should Cabinet not approve these changes at its July meeting, then the implementation of the policy changes will be delayed by a further academic year and will mean that the service is not able to meet the savings needed to remain within its budget. This is because the Council is required to provide a full academic years’ notice of any changes to its home to school transport policy.

7.4 Consultation and Communications

7.4.1 Formal public consultation on the proposed changes to the policy commenced on 31st March 2023 and closed at midnight on Tuesday 30th May 2023.

7.4.2 The consultation consisted of an online questionnaire which was made available through the council’s consultation hub, Citizen Space, at: <https://westnorthants.citizenspace.com/cet/home-to-school-transport-2023>. The questionnaire was offered in an alternative format including large font or easy read. Paper copies were made available where required. Alternatively, people could also respond via email at schooltransportpolicy@westnorthants.gov.uk, or post using The Guildhall address.

7.4.3 People could also provide comments during the following consultation events:

Date & Time	Location
27 April, (10am to 12pm)	Engine Room, West Northamptonshire Council, One Angel Square, Angel Street, Northampton, NN1 1ED
28 April, (5pm to 8pm)	Egerton Hall, Juno Crescent, 20 High Street, Brackley, NN13 6GN
2 May, (4pm to 7pm)	Jeffrey Room, West Northamptonshire Council, The Guildhall, St Giles' Square, Northampton, NN1 1DE
4 May, (4pm to 7pm)	Council Chamber, West Northamptonshire Council, The Forum, Moat Lane, Towcester, NN12 6AD
10 May, (4:30pm to 7:30pm)	Daventry Volunteer Centre, New Street, Daventry, NN11 4BT

7.4.4 The consultation included access to all related documentation and material associated with the proposals along with further information and explanations around the reasoning for the proposals and frequently asked questions.

7.4.5 The consultation was publicised widely throughout the duration of the consultation period using different means including:

- Local press: A series of media releases that went to circa 370 newsrooms and individuals (including hyperlocal, local, regional, and national, print, digital and broadcast including the Chronicle and Echo and BBC Radio Northampton) from the council’s Communications Team.
- Social media:
 - 6 promotions using Twitter, reaching a cumulative total of 5861 accounts, prompting 130 engagements through clicks, likes and shares.
 - Additionally, the consultation was promoted through Facebook posts 6 times, reaching a cumulative total of 23945 accounts, prompting 128 engagements through clicks, comments, reactions, and shares.
 - E-newsletters were sent on 3 different dates during the consultation. Articles were also included in news bulletins to town and parish councils.
 - Online council news pages: Internal communications and external public pages.
 - Notifications were sent to 186 educational establishments in West Northamptonshire at the start of the consultation and a reminder during including academies, maintained, universities, nurseries, and Special Educational Needs and Disabilities.
 - Detail about the consultation was also circulated via email to those registered on the council’s Consultation Register and Residents Panel (over 500 contacts), as well as being sent to council members and parish councils. Wider promotion of the consultation was encouraged through these means.

7.4.6 There were 1460 online responses to the questionnaire through the Council’s consultation platform.

7.4.7 The online consultation questionnaire was structured in a way that respondents were able to comment on individual proposals. There was no requirement for respondents to answer every question, therefore the total of responses for each question may differ. A summary report of the consultation is set out in Appendix A.

7.4.8 Discussion on the consultation took place directly with the Northampton Parent Forum Group (NPPFG) which included attending weekly meetings. As result, there have been minor changes made to the proposed policy. These changes are for clarity only and do not have a significant impact the proposals presented in this Cabinet report.

7.5 **Consideration by Overview and Scrutiny**

7.5.1 A summary of the proposed policy changes was presented to the Place Overview and Scrutiny Committee at their meeting held on 18th April 2023.

7.6 **Climate Impact**

7.6.1 Any reduction in the number of vehicles operated by the Council will help reduce the Council’s carbon footprint. Additionally, the measures proposed within this report could give rise to an increase in children walking and cycling to school which will help with support the Council’s health and wellbeing objectives.

7.6.2 There could be an increase in parents deciding to transport their child to and from school themselves as they are not willing to pay the cost of a non-entitled bus pass, however it is not possible to quantify how many parents may chose this option. Officers will work with schools to help promote more sustainable transport arrangements for parents and where requested, help schools procure their own transport.

7.7 **Community Impact**

7.7.1 Concern was raised in the consultation that the proposed changes could unfairly disadvantage families residing in more rural areas.

7.7.2 In many rural areas, where parents decide to send their child to their nearest secondary school, they are likely to be entitled to free home to school transport due to the distance being more than 3 miles or because the route is deemed unsuitable to walk. Therefore, if parents or carers elect to send a child to a school which is not the nearest, then they are responsible for ensuring they can get their child to and from that school. Parents and carers do have a choice and can avoid relying on the Council's non-entitled scheme if they chose their nearest or geographically associated school.

8. **Background Papers**

8.1 Equality Screening Forms and Equality Impact Assessments have been completed for each of the proposals and have been updated following the public consultation.

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**West
Northamptonshire
Council**

Home to School Transport Consultation 2023

Contents

1. Executive Summary	2
2. Introduction.....	3
2.1 Overview.....	3
2.2 Related documents	4
2.3 How to have a say	4
2.4 Method	4
2.5 Publicity	4
3. Response to the online consultation.....	5
3.1 Response profile	5
3.2 Proposed Spare Seat Scheme	9
3.3 Home to School Education Transport Policy.....	12
3.4 Increase the Cost of Non-entitled Bus Pass	19
3.5 Further comments.....	21
4 Written responses	22
5 Feedback from consultation events	24

1. Executive Summary

- The Home to School Transport Consultation 2023 Consultation received a total of 1509 responses. 1460 were received via West Northamptonshire Council's online consultation platform, 49 were received by email.
- The consultation period for submitting responses was between 31 March 2023 and 30 May 2023.
- Most of the responses received through the online consultation platform were from local residents (1358).
- The consultation detail has been widely promoted using several means including local press, social media, newsletters, email notifications and public consultation drop-in events.
- Proposal to make available spare seats to those in order of the proposed defined priority: 35 per cent agree, 49 per cent disagree, 12 per cent neither agree nor disagree, 5 had no opinion. 306 comments received on proposal.
- Proposal to remove the non-statutory elements of the policy:
 - For transport to linked schools: 13 per cent agree, 78 per cent disagree, 7 per cent neither agree nor disagree, 2 had no opinion.
 - Proposal to remove the non-statutory element of the policy for transport for under 5's for mainstream schools: 17 per cent agree, 52 per cent disagree, 17 per cent neither agree nor disagree, 14 had no opinion.
 - Proposal to remove the non-statutory element of the policy for transport for those in year 11 who move and would not be entitled unless the move took place

due to an emergency: 23 per cent agree, 58 per cent disagree, 11 per cent neither agree nor disagree, 8 had no opinion.

There were 236 comments received on the proposals to remove the non-statutory elements of the policy.

- Reasonableness to review entitlement for Rising 8's as a scheduled task throughout the year: 19 per cent agree, 39 per cent disagree, 23 per cent neither agree nor disagree, 19 had no opinion. 78 comments received.
- The proposed walking route criteria is clear whilst ensuring the safety of school children: 33 per cent agree, 39 per cent disagree, 16 per cent neither agree nor disagree, 12 had no opinion. 160 comments received.
- Proposal to increase the annual fee for the discretionary provision for non-entitled school travel assistance to help meet the cost of providing the service: 19 per cent agree, 73 per cent disagree, 6 per cent neither agree nor disagree, 2 per cent had no opinion. 377 comments received on proposal.
- The invitation to make any further comments on the Home to School Transport or the Draft Home to School Transport Policy received 232 comments.

2. Introduction

2.1 Overview

We asked for views on changes being proposed to our Home to School Transport service. These changes are required to meet increased demand and operating costs, whilst also exploring opportunities to give greater flexibility for parents, support our young people's independence and help to promote sustainable travel.

We recognise circumstances for each child, young person and family are often different, therefore we needed to know how each of our proposals may affect children, parents, and carers. We also sought views from schools and colleges who may also be affected.

This is part of a larger review of transport policies, including Post-16. A consultation of the Post-16 policy will take place later this year, following a full review of bus services.

The changes we are proposing will not come into effect until September 2024.

As well as inviting general comments on the Draft Home to School Education Transport Policy, the consultation focused on the following key areas of Home to School Transport, respondents could choose to comment on some or all. The key areas of this consultation:

- Proposed spare seat scheme
- Removal of entitlement to linked schools
- Provision of transport for rising 8's
- Removal of transport for children under 5 for mainstream pupils only
- Removal of travel assistance for year 11 pupils who move home during the academic year
- Review of suitable walking route criteria
- Increase the cost of non-entitled bus pass

This document sets out the summarised results to the consultation which took place from 31 March 2023 to 30 May 2023.

2.2 Related documents

- Supporting information
- Draft Home to School Education Transport Policy (September 2024 – July 2025)
- Draft Spare Seat Scheme
- Draft Walking Route Assessment Criteria
- Frequently Asked Questions (updated throughout consultation)

2.3 How to have a say

People were invited to have their say by either:

- Attending one of the 5 drop-in consultation events
- Completing an online survey
- Emailing or writing in.

2.4 Method

The consultation consisted of an online questionnaire which was made available through the council's consultation hub, Citizen Space, at:

<https://westnorthants.citizenspace.com/cet/home-to-school-transport-2023>

The questionnaire was offered in an alternative format including large font or easy read. Paper copies were made available where required. Alternatively, people could also respond via email at schooltransportpolicy@westnorthants.gov.uk, or post using The Guildhall address.

People could also provide comments during the following consultation events:

Date	Venue location
27 April	West Northamptonshire Council, One Angel Square, Angel Street, Northampton
28 April	Egerton Hall, Juno Crescent, 20 High Street, Brackley
2 May	Jeffrey Room, West Northamptonshire Council, The Guildhall, St Giles' Square, Northampton
4 May	Council Chamber, West Northamptonshire Council, The Forum, Moat Lane, Towcester
10 May	Daventry Volunteer Centre, New Street, Daventry

Respondents were provided with related documentation and material that related to the proposals within the consultation. Respondents were also provided with further information and explanations around the reasoning for the proposals which were positioned throughout the parts of the online questionnaire for ease of accessing this information.

2.5 Publicity

The consultation was publicised widely throughout the duration of the activity using different means including:

- Local press: A series of media releases that went to circa 370 newsrooms and individuals (including hyperlocal, local, regional, and national, print, digital and

broadcast including the Chronicle and Echo and BBC Radio Northampton) from the council's Communications Team.

- Social media:
 - 6 promotions using Twitter, reaching a cumulative total of 5861 accounts, prompting 130 engagements through clicks, likes and shares.
 - Additionally, the consultation was promoted through Facebook posts 6 times, reaching a cumulative total of 23945 accounts, prompting 128 engagements through clicks, comments, reactions, and shares.
- E-newsletters were sent on 3 different dates during the consultation. Articles were also included in news bulletins to town and parish councils.
- Online council news pages: Internal communications and external public pages.
- Notifications were sent to 186 educational establishments in West Northamptonshire at the start of the consultation and a reminder during including academies, maintained, universities, Nurseries, and Special Educational Needs and Disabilities.

Detail about the consultation was also circulated via email to those registered on the council's Consultation Register and Residents Panel (over 500 contacts), as well as being sent to council members and parish councils. Wider promotion of the consultation was encouraged through these means.

3. Response to the online consultation

There were 1460 online responses to the questionnaire through the council's consultation platform.

The online consultation questionnaire was structured in a way that respondents were able to comment on individual proposals. There was no requirement for respondents to answer every question, therefore the total of responses for each question may differ.

3.1 Response profile

Respondents were asked to select each option that applies to them. This question allowed for more than one answer.

There were 1603 responses to this question. A majority of respondents were local residents (1358).

Table 1, Are you

Respondent type	Count
A local resident of West Northamptonshire	1358
A representative of a town/parish council	12
A representative of the voluntary sector or a community organisation	18
A business or representative of the local business community	16
An educational professional or representative of an education provider	115
A representative of a health partner organisation (for example integrated care, mental health trust)	2
A West Northamptonshire councillor	8
A town or parish councillor	18
A West Northamptonshire Council employee	22

Respondent type	Count
Other	34

Respondents were also asked to choose one option to state what capacity they were responding to the consultation. This was a required question, therefore were 1460 responses.

Table 2, In what capacity are you responding to this consultation?

Response	Count
A parent or carer of a child or young person that attends nursery, school, college, or other further education	1188
A student aged 16 to 19 or up to 25 if you have Special Educational Needs or Disabilities (SEND)	15
A transport professional (taxi, minibus, bus operator)	13
An educational professional (head, or another representative)	64
Another organisation, business or group	5
Another interested party	119
None of the above	56

Parents and carers

Those who responded as a parent or carer of a child or young person were asked a series of questions to assist us to build an accurate understanding of the characteristics and communities responding. 72 per cent of those who stated they were parents or carers, completed all or some of this part.

Parent and carer respondents were asked which age group applies to their children or young people; this question allowed for more than one answer as applied to any child within their care. There were 1628 responses to this question.

Table 3, Which age group applies to your children or young people?

Response	Count
Age 0 to 4 (early years)	84
Age 4 to 5 (reception)	84
Age 5 to 11 (school years 1 to 6)	441
Age 11 to 16 (school years 7 to 11)	834
Age 16 to 18, post 16 (school years 12 to 13)	164
Age over 16 (school years later than 13)	21

Parents and carers were asked where their children or young people attended school. 1102 said they go to school in West Northamptonshire, and 55 said they go to school outside of the area. They were also asked about the type of school, if their children or young people currently receive home to school transport, has Special Educational Needs or Disabilities, and has an Education, Health and Care plan, the following questions allowed for more than one answer:

Table 4, Which of the following describes your children or young people’s current school or further educational establishment?

Response	Count
Mainstream school	1077
College	34
Special educational needs (SEND) school	51
Other	18

Table 5, Which of the following currently apply to your children or young people?

Response	Count
Eligible for free Home to School Transport	762
Allocated a spare seat	43
Post-16	123
None of the above	296

Table 6, Does your child or young person have Special Educational Needs or Disabilities?

Response	Count
Yes	178
No	906
Unsure	34

Table 7, Does your child or young person have an Education, Health and Care plan?

Response	Count
Yes	88
No	999
Unsure	33

Students in education

Those who responded as a student over the age of 16 were asked a series of questions to assist us to build an accurate understanding of the people responding. All who stated they were students, completed all or some of this part.

Student respondents were asked which age group applies to them. There were 10 responses to this question.

Table 8, Which age group are you in?

Response	Count
Age 16 to 18, post 16 (school years 12 to 13)	9
Age over 16 (school years later than 13)	1

Students over 16 were asked where they attend school. 10 said they go to school in West Northamptonshire, and 1 said they go to school outside of the area. They were also asked about the type of school, if they currently receive home to school transport, have Special Educational Needs or Disabilities, and have an Education, Health and Care plan:

Table 9, If you attend school or a further education establishment, please select the option that applies:

Response	Count
Mainstream school	6
College	1
Special educational needs (SEND) school	4
Other	1

Table 10, Which of the following apply to you?

Response	Count
Eligible for free Home to School Transport	4
Allocated a spare seat	0
Post-16	6
None of the above	0
Unsure	1

Table 11, Do you have any Special Educational Needs or Disabilities?

Response	Count
Yes	7
No	4
Unsure	0

Table 12, Do you have an Education, Health and Care plan?

Response	Count
Yes	6
No	4
Unsure	1

Organisation

Those who identified that they were responding on behalf of an organisation were asked to provide detail namely their organisation name and job role. Of the 50 that responded, they identified as education providers or support services. Job roles of respondents are omitted from this report to protect anonymity. All of those who stated they were responding on behalf of one of these groups, completed all or some of this part.

Respondents to this part were asked if they could tell us if they provided certain services relevant to this consultation.

Table 13, Does your organisation or group provide any of the following?

Response	Count
School transport services	17
Other services for children with SEND	26
None of the above	15

3.2 Proposed Spare Seat Scheme

This proposal affects non-entitled students that currently apply for a seat on one of our existing contracted services and who are then guaranteed transport. This provision will be replaced, and instead there will be a requirement to apply for a seat under the new Spare Seat Scheme.

Currently parents of non-entitled students can apply for transport by the third Friday in May each year and are then guaranteed a seat on one of our existing contracted services. Our proposal is to withdraw this provision and parents will instead be required to apply for a seat under the Council's new Spare Seat Scheme. The new Spare Seat Scheme will prioritise applications in the following order:

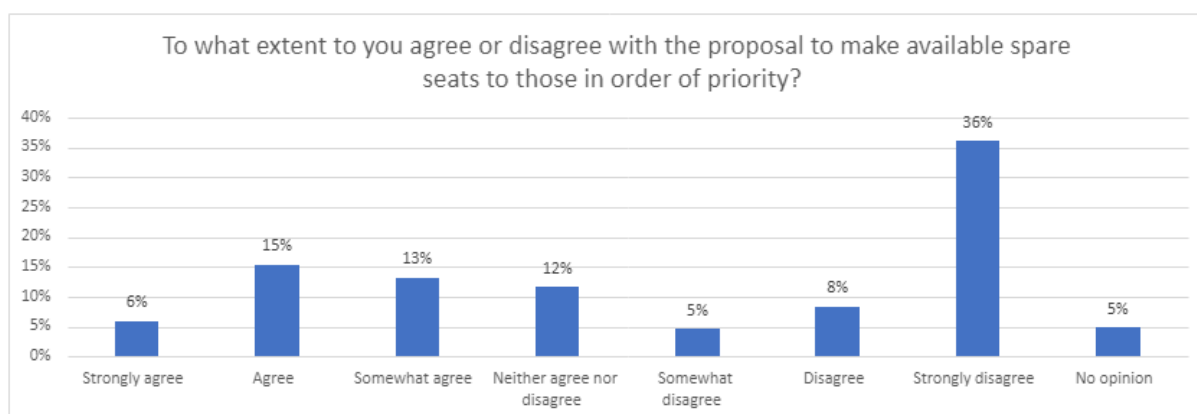
- i. Post 16 Applications that are being renewed
- ii. New Post 16 Applications
- iii. Non entitled children with special educational needs or disability
- iv. Looked After Children or former Looked After Children who have been adopted
- v. Children of Armed Forces personnel - in line with our duty as part of the West Northamptonshire Armed Forces Covenant
- vi. Siblings of eligible students travelling on the same route
- vii. Non entitled mainstream children
- viii. All others - on a first come first served basis from date of application.

Respondents were asked to what extent they would agree or disagree with the proposal to make available spare seats to those in order of priority as detailed above. There were 1192 responses to this question with 412 stating they strongly agreed, agreed, or somewhat agreed, and 585 strongly disagreed, disagreed, or somewhat disagreed.

Table 14, To what extent to you agree or disagree with the proposal to make available spare seats to those in order of priority as detailed above?

Response	Count	Per cent (%)
Strongly agree	71	6
Agree	183	15
Somewhat agree	157	13
Neither agree nor disagree	138	12
Somewhat disagree	55	5
Disagree	101	8
Strongly disagree	430	36
No opinion	57	5

Chart 1



Respondents were asked to provide any comments on the proposed spare seats scheme. 306 chose to provide comment. 55 comments were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

- a) Many of those that agree with the proposal had a comment to make about the priority order, the majority being that siblings should sit higher in the list. Some also feel that the order does not appropriately prioritise some children and young people that may be vulnerable due to age or needs.
- b) Some in agreement with the proposal felt that there should be a uniformed approach on seat allocation and be fair to all in full time education. Some also felt that if education is forced until the age of 18, then the provision for Post-16 should be guaranteed.
- c) A small number of those that agree felt that the cost of the service is not affordable, unrealistic especially in a cost-of-living crisis and is unfair for those that have no other choice but to use the service.
- d) A few respondents questioned the narrative of the consultation noting that costs were not clear, it would be helpful to know who this would affect, and questioning how many seats are anticipated and why the council does not have its own service.
- e) A few respondents reinforced the reason they agreed by noting that it would make savings, it is positive that children with disabilities and looked after children will be prioritised.
- f) A few comments called for flexibility of circumstances, stating that parents and carers need to be considered to take account of certain circumstances.
- g) A couple of comments were received noting that Government or the council should organise free school transport, that the proposal is not fair to parents as does not consider their circumstances for example, disabilities, income or working hours.
- h) Comments were also received about unfairness of SEND having to apply for a spare seat, that the service standards are questionable, the proposed would cost the council more, that children and young people should have "grandfather rights," that rural localities are unfairly penalised, and the implications of adopting this approach would be unsafe and not environmentally friendly.

12 Respondents who said that they neither agree nor disagree provided comment:

- a) A few noted that the cost was unaffordable in a current cost-of living-crisis, one noting that payments by instalment should be an option.
- b) A few felt it was unfair for parents/carers that do not have access to a vehicle, that if they cannot get a seat then other schools will need to be considered which is not appropriate when children are settled.
- c) There were also comments received for the following: concern around children standing on buses, that it is not fair on working parents.

The majority of the 231 comments received for respondents who strongly disagree, disagree, or somewhat disagree were about...

- a) Many of the respondents that disagree with the proposal made reference to it being unfair for the reasons that all those attending full time education should be entitled also considering that they need to stay in full time education, that another school will need to be found without considering the detrimental impact on the child or young person or on oversubscription of schools, and that it unfairly impacts working parents or those that do not have access to a vehicle or support.
- b) Many of the respondents felt the proposal unfairly affects those who live in rural areas, offering little or no choice for these due to roads being unsafe to travel any other way. A number of these respondents raised concerns about particular locations in villages and certain schools. Some also stating that the rural located schools would be adversely affected in not getting enough admissions.
- c) A number of respondents commented on the cost of the proposal being too expensive and not considerate of the expense due to current climate or the circumstances of parents/carers and families. Some referring to a cost that is being forced on them due to having no alternative of school due to the distance.
- d) Some respondents felt that the priority order was not appropriate, with comments that siblings should sit higher in the order, that Post-16 should not sit highly, and those who originally were provided a seat would be missing out if the proposals are to be accepted.
- e) Some felt that parent/carers are being penalised due to employment, and some having no other means of transport or support.
- f) A small number of respondents commented on lack of support from the council and Government, noting that the proposal goes against Government agendas against communities. Some calling for the council to act more responsibly.
- g) Other comments included: The reason and narrative being unclear on the proposals and who is affected, that they are not given any choice but instead forced into a situation that may not be appropriate, that the scheme should be based on a first come first served basis, and that there will be issues with timing of application and acceptance.
- h) A small number of comments also noted that the proposal, if adopted, will impact the environment negatively, be dangerous for those forced to walk, that it is uncertain if children/young people can attend education, that those who made a choice originally now have no choice, not considerate of in year changes such as exams. Some also question what happens if not allocated a seat where they otherwise would have been.

7 comments were provided by respondents who selected 'no opinion' or chose not to select an answer. A small number commented that the detail of the proposal is unclear, that they do not understand the reason behind the cost, and that everyone should be entitled. A couple explained that the question did not apply to them.

1 respondent that did not answer but chose to provide comment noted that they were not sure what spare seats meant.

3.3 Home to School Education Transport Policy

The Home to School Education Transport Policy applies to children and young people aged from 4 to 16 in full time education.

The key proposals that relate to this policy are:

- The removal of the discretionary entitlement to linked schools

The current policy makes provision for free travel assistance to a child's nearest or linked school however historically the application of the term 'linked' has different meanings in the Home to School Transport Policy and the Council's School Admissions Booklet. This has led to some confusion for both parents and schools as to whether a child is entitled to free travel assistance.

The Council's proposal is to remove the entitlement to linked schools and provide transport to a child's nearest school only, with available school places. This will help prevent any confusion and make it clearer for parents as to their child's entitlement to free travel assistance.

- An operational change to the provision of transport for Rising 8's to review entitlement

Under the current policy, the entitlement to free travel assistance changes when a child turns 8 years old as the statutory walking distance increases from 2 to 3 miles. Periodically the Council will review entitlement for these children and the proposal is that this will become a scheduled task at regular intervals throughout the academic year.

This is an operational change, not a policy change and those students who qualify for enhanced support under the Governments Extended Rights provision will continue to receive support.

- The removal of the discretionary provision to transport children under 5 for mainstream only

The current policy provides discretionary travel assistance to children in reception class. The Council propose removing this discretionary travel assistance (i.e., free transport) for pupils below the statutory age for education (those in Reception Year who have not yet turned 5 years), for mainstream only.

Legally parents are not required to send their child to school until the term after their 5th birthday and there is no statutory duty for the council to provide transport, therefore reception is a parental choice.

- The removal of the discretionary provision of travel assistance for Year 11 pupils who move home during the academic year

Currently where a family move home during year 11, and their current school is no longer deemed their nearest or linked, the Council will consider providing travel assistance to support the student in completing their GCSE's. The proposal is to remove this discretionary provision unless the house move is necessitated by an emergency such as a house fire or due to domestic abuse.

- A review of suitable walking route criteria

The current walking route criteria is not clear and can be confusing for parents. We want to simplify this at the same time as ensuring that the safety of school children is maintained at all times. The Draft Walking Route Criteria was supplied to respondents as part of the consultation.

Respondents were asked what extent they agreed or disagreed with proposals to remove certain non-statutory elements of the Home to School Education Transport Policy.

Table 15, Removal of the provision of transport to linked schools

1008 chose to answer this question.

Response	Count	Per cent (%)
Strongly agree	41	4
Agree	54	5
Somewhat agree	34	3
Neither agree nor disagree	72	7
Somewhat disagree	42	4
Disagree	106	11
Strongly disagree	637	63
No opinion	22	2

Table 16, Removal of the provision of transport for under 5's for mainstream schools

988 chose to answer this question

Response	Count	Per cent (%)
Strongly agree	60	6
Agree	66	7
Somewhat agree	42	4
Neither agree nor disagree	166	17
Somewhat disagree	32	3
Disagree	126	13
Strongly disagree	360	36
No opinion	136	14

Table 17, Removal of the provision of transport for those in Year 11 who move and would not be entitled unless the move took place due to an emergency

989 chose to answer this question

Response	Count	Per cent (%)
Strongly agree	55	6
Agree	103	10

Response	Count	Per cent (%)
Somewhat agree	74	7
Neither agree nor disagree	105	11
Somewhat disagree	43	4
Disagree	132	13
Strongly disagree	400	40
No opinion	77	8

Respondents were asked to provide any comments on the removal of the non-statutory elements. 236 chose to provide comment.

The following provides a summary of the responses to the proposal to remove the statutory elements of the Home to School Education Transport Policy:

Those that specifically referenced the proposal to remove the provision of transport for linked school's summary of comments:

- Change will cause significant disruption, and remove choice, forcing children and young people to a school or area that is not appropriate or not suitable, impacting on their education, independence, health, and wellbeing
- The proposal either forces notable change or significant expense, the latter is not appropriate in this current climate
- Change will affect a vast number of children, especially those in some rural areas and particular villages
- There will be a social impact, that the proposal will divide children and communities and highlight those that have no option to go to another school, that children should not be split by postcode
- Will restrict education opportunities and opportunities for parents/carers working life
- Uncertainty or of siblings attending the same school
- Some rural areas already struggle with reduced or no public transport
- The proposal is not in line with catchment areas, particularly for some villages
- If the proposal is introduced, it could force people to use active travel at a risk to their safety
- Will lead to increased carbon emissions and contradicts environmental policies
- Transport should be provided to SEND without altering the current offer or what they are routinely used to
- Those currently in education should have the same provision until they finish school
- The proposal will further stretch limited school provision, schools will be oversubscribed
- The term Linked School is not clear, as is the reasoning and information
- Will discriminate those families on low-income or will force families into hardship
- Those located rurally should be entitled to a bus service

For the provision of transport for under 5's for mainstream schools the following provides a summary of comments:

- Discriminates low-income families, and children depending on when they have their birthday

- Not in children or parent/carers best interests, disregards the importance of development, getting children settled in a school setting, and bonding
- Not considering the importance of education for under 5's
- Goes against the councils' own objective of children having the best start in life
- Provision is not fair on parents that work or on low-income families
- Disregards SEND

Comments were received specifically sighting the proposal that could affect year 11's, the following provides a summary of these comments:

- Change will cause significant disruption, remove choice, impacting education, independence, health, and wellbeing. The change means that potentially young people will have no choice but to disrupt their education and change schools when they are preparing for GCSE's
- Proposal does not properly identify what an emergency would be, and what if it is not an emergency but serious, justified, and unavoidable. Penalises parents for wanting or needing to move for anything other than an emergency
- Question why year 11 are being singled out
- Proposal does not consider students best interests
- Generally unfair, and should consider low-income families as well as the needs of those affected

Other comments about the removal of the statutory provisions are summarised as follows:

- Removing these provisions negatively impacts the environment and will greatly increase carbon emissions, increase traffic and congestion, cause issues outside of schools that already have limited space and access.
- Larger schools will not cope with increased pressure and demand, and smaller schools will suffer with less demand
- Education is not an option, therefore why would the ability to get there be. Could lead to loss of education. Transport should be provided until the end of education. Generally, these proposals make it harder for children to stay in education.
- Not considering the rural communities, their needs and choice
- A school would have been chosen on the basis that there was a transport provision, to change this midway through children and young people's educational journey is unfair and unjust.
- Children with additional needs or SEND need to be considered along with their routine, a change would adversely affect them, the proposals greatly affect SEND and their families.
- Suddenly removing the provision is unacceptable.
- There is a need to consider the cost implications completely including the sudden increase, the amount parents/carers will need to pay if they want to stay in the same school, the hardship it may cause low-income families.
- Question the drivers for the proposed changes and call for straightforward evidence to be provided that supports these changes and what the positive outcomes would be. Reference is also made to provision for affordable housing and other plans being approved yet removing the non-statutory provisions will have a negative impact on communities, sustainability, and the wider housing market. Also question why children and young people have not been consulted.

- The council and Government need to take more responsibility ensuring provision is professionally managed. The council have not made the information and proposals clear enough, using complicated terminology. The council is unfair in making these cuts and needs to think of the children and its duty to them rather than budgets.

Respondents were asked if they felt that it is sensible to review entitlement for Rising 8's as a scheduled task throughout the year, 969 chose to provide response to this question.

Table 18, To what extent do you agree or disagree that it's sensible to review entitlement for Rising 8's as a scheduled task throughout the year?

Response	Count	Per cent (%)
Strongly agree	30	3
Agree	74	8
Somewhat agree	79	8
Neither agree nor disagree	221	23
Somewhat disagree	39	4
Disagree	109	11
Strongly disagree	231	24
No opinion	186	19

Respondents were asked to provide any comments on reviewing the entitlement for Rising 8's being a scheduled task. 78 respondents chose to provide comment. 10 comments were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

- a) Some respondents said that the proposal was reasonable as long as it was scheduled with enough notice, or is completed on a case-by-case basis.
- b) Other comments referred to the importance of routine for SEND, raised concern about distance if walking. There was also a question on why the focus is on this age group, and a comment noting that it was not easy to understand the question.

9 Respondents who said that they neither agree nor disagree provided comment:

- a) Over half of these respondents felt that the detail was unclear, there was not enough rationale provided, or they did not understand.
- b) A couple of respondents stated concerns over walking distances and safety.
- c) Other comments related to untimely costs, and wanting consistency through the academic year.

41 comments were received for respondents who strongly disagree, disagree, or strongly disagree:

- a) Many of these respondents raised concern around children's welfare or safety noting that distances are unreasonable considering ages and ability. Also having the provision potentially withdrawn would be unsettling/detrimental to those who already have this entitlement, and children should not be sent to other inappropriate schools if they are not entitled.
- b) Some respondents asked for no cuts to services, no changes during the academic year. They also felt that there was not enough information, or they did not understand the question or terminology.

- c) Comments were provided explaining reasons why a review should not be undertaken including that resources could be put to better use, that parents and children need certainty, and that it would cause disruption to a child's education.
- d) Other comments included that it should be fair for all, or a right, questioned fairness

18 comments were received from respondents that either had no opinion on the matter or did not state to what extent they agree or disagree. Most of these respondents were unsure of the terminology used for this proposal. Other respondents felt that the entitlement should be fairer.

Respondents were asked to what extent do they agree or disagree that the proposed walking route criteria is clear whilst ensuring the safety of school children, 976 chose to provide response to this question.

Table 19, To what extent do you agree or disagree that the proposed walking route criteria is clear whilst ensuring the safety of school children?

Response	Count	Per cent (%)
Strongly agree	95	10
Agree	133	14
Somewhat agree	95	10
Neither agree nor disagree	158	16
Somewhat disagree	32	3
Disagree	109	11
Strongly disagree	237	24
No opinion	117	12

Respondents were asked to provide any comments on the proposed walking route criteria. 160 chose to provide comment. 27 comments were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

- a) Many of those that agree are concerned about safety, that all children should feel safe when walking to school which includes consideration around the suitability of routes, such as suitable lighting and footpaths. Consideration also needs to be given to weather conditions and time of year.
- b) Many also raise concern over distance, that for many rural locations a walking route is not suitable due to being isolated with only options to cross fields or walk on busy national speed limit roads.
- c) Some respondents felt that the walking route criteria is incorrect and not feasible in winter months or where there are safety concerns. Calling for the criteria to be thoroughly considered and realistic. The criteria also do not account for school equipment, and assumption is that parents will accompany their child however this is sometimes up to a certain age.
- d) There were some comments that felt that the walking criteria was clear and that walking or cycling should be encouraged providing safety is not compromised.

- e) Other comments received included: That it is not clear who the criteria apply to for instance those who cannot walk to school as they attend a school that suits their needs rather than the nearest, that transport should be provided to those that cannot walk to their catchment school.
- f) Some comments provided suggestions around there needing to be more child safety arrangements directly outside of schools, that active travel should be encouraged and promoted, that walking routes should be limited to a safe zone area around a school (where safe), that weighting should be given to those in rural locations with no public transport.

13 Respondents who said that they neither agree nor disagree provided comment:

- a) Many of these respondents gave comment over safety concerns, or considering safety. These included main roads being unsafe, with no walkways or lighting, high volumes of traffic, routes should be free from too many crossings and verges should not be considered as safe for children to walk along.
- b) A few comments related to unsuitability due to being rurally isolated, or in a village without suitable measures for walking, or being too far to walk.
- c) There were a couple of comments relating to the narrative being unclear, noting they were not sure what the criteria is, or that they did not have enough information to provide an informed response.
- d) Other comments on the walking route clarity and criteria included a suggestion to have a bus stop in a safe walking distance from a school to encourage walking, to consider those SEND or other issues that prevent comfortable walking, that the criteria are not realistic to distance related circumstances.

113 comments were received for respondents who strongly disagree, disagree, or somewhat disagree:

- a) The majority of these comments raised concerns over safety including main roads, crime areas or increased risk from criminals or attacks and dangerous adults, dark underpasses, lack of footpaths and lighting, cars avoiding potholes, blind corners, large vehicles mounting pavements, walking in dark months or extreme weather, crossing roads, crossing/passing waterways. Many also stating that a road without a footpath, and suitable lighting, is entirely unsuitable questioning how this could be disregarded. Some noted that the criteria are not reasonable, and if there is not proper consideration into safety concerns it could lead to accidents or harm. Other comments relating to safety include: respondents asking what is involved in the assessment, when assessments are carried out, safety of drivers is also a risk to avoid walkers not on suitable paths.
- b) Some felt that distance and rural isolation has been disregarded, and it is unrealistic to expect a child or young person to walk or cycle a great distance without being tied and compromising their education. Some also commented on children and young people having to carry school equipment great distances, and storage of clothing needed to travel this way. There were also comments around how the distance is calculated.
- c) There were some comments relating to the criteria being unfair, not carefully considered or planned. Comments included that other factors should be considered such as school circumstances, all safety aspects, and practicality. Some felt that further explanation and information is needed in the criteria, that the criteria are not

clear and brings routes into doubt with the criteria stating routes are safe and the reality being that it/they are not.

- d) Other comments included that the criteria disadvantages children with disabilities or medical issues particularly those SEND, unrealistic and penalises parents, and forces parents and carers to take children to school increasing traffic and emissions. Some comments also relate to the council inappropriately cutting costs at the detriment to children, young people, parents/carers, not taking care of roads, question what the council thinks is acceptable, and note that this proposal goes against other council agendas.

7 comments were received from respondents that either had no opinion on the matter or did not state to what extent they agree or disagree. These included comments that those in full time education should be entitled to free transport, that the detail is not relevant as unrealistic based on their location, routes being unsafe, and questioning what is deemed as safe.

3.4 Increase the Cost of Non-entitled Bus Pass

The proposal is to increase the contribution towards the financial costs incurred by West Northamptonshire Council in providing transport, by increasing the cost of a bus pass that parents currently pay for statutory school age non-entitled children.

Local authorities can charge a contribution where a passenger does not have a statutory entitlement.

The current policy provides discretionary travel assistance to non-entitled children at a cost of £600 per annum. These costs have been reviewed and one of the proposed changes is to revise the contribution required by parents who apply for a spare seat under the new scheme.

The cost of a bus pass is proposed to increase to £1000 per academic year which better reflects the actual cost to the Council for providing a seat to a mainstream learner and will therefore help meet the costs of providing the service. The current £600 cost was introduced 10 years ago and has not been increased until now.

The increased cost will apply to both Special Educational Needs and Disabled students and Mainstream students.

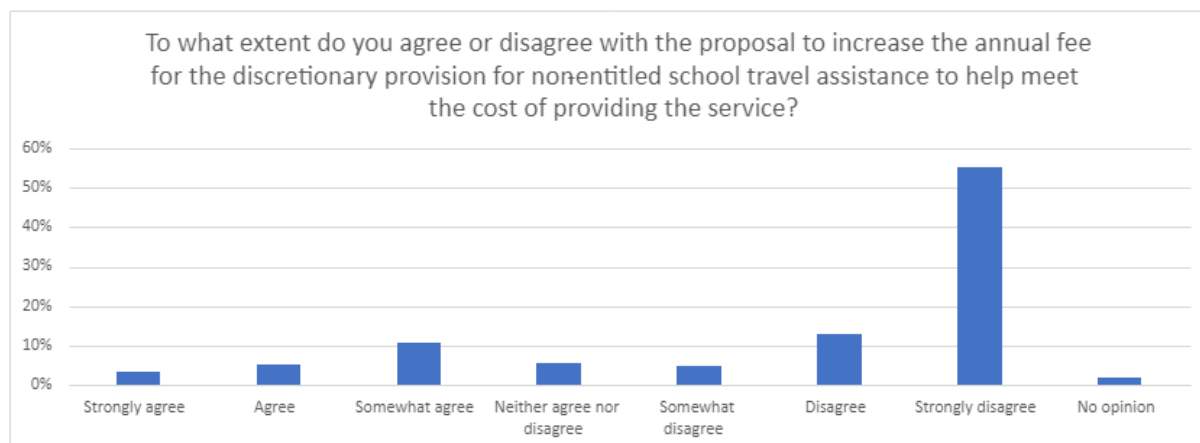
Respondents were asked to what extent they agree or disagree with the proposal to increase the annual fee for the discretionary provision for non-entitled school travel assistance to help meet the cost of providing the service. There were 987 responses to this question with 191 stating they strongly agreed, agreed, or somewhat agreed, and 721 strongly disagreed, disagreed, or somewhat disagreed.

Table 20, To what extent do you agree or disagree with the proposal to increase the annual fee for the discretionary provision for non-entitled school travel assistance to help meet the cost of providing the service?

Response	Count	Per cent (%)
Strongly agree	33	3

Response	Count	Per cent (%)
Agree	52	5
Somewhat agree	106	11
Neither agree nor disagree	57	6
Somewhat disagree	49	5
Disagree	128	13
Strongly disagree	544	55
No opinion	18	2

Chart 2



Respondents were asked to provide any comments on the proposal to increase the annual fee. 377 chose to provide comment. 53 comments were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

- Many commented that the increase was set too highly especially in a cost-of-living crisis
- Some agreed that the increase should reflect the actual cost
- Some suggested phased or means tested options. Other suggestions included having a cost proportionate to distance travelled.
- There was also comment that the increase penalises low-income and rural families.

7 Respondents who said that they neither agree nor disagree provided comments that the cost should reflect how the child was allocated the school making it fairer, the cost should not go up too much but a rise is understandable, that increase should be phased in, and payments taken in instalments, and that an increase is better received than a complete cut in service provisions.

316 comments were received for respondents who strongly disagree, disagree, or somewhat disagree:

- The majority of these comments indicated that the increase is too much, unaffordable to increase in one go in the current climate, is disproportionate, and too sudden. Also commenting that parents have no option, and the proposal is unfair, as changes should not be forced in this way as it is compulsory to stay in education.
- Some felt significantly disadvantaged as they have more than one child, are a single parent, are on low-income, in a rural location, working and unable to transport their

- child, or otherwise have no choice but to pay an amount that they disagree with when they made an original choice based on cost of transport.
- c) Some felt that the proposal decreases the life chances of children and young people by removing choice and parents/carers having no option but to reconsider school choices. Some also felt that children will simply not be able to attend school and would suffer academically. There were also concerns around welfare of those attending school and parents/carers having to make cuts around bills and food, also concerns for children and young people that are considered as vulnerable.
 - d) Some respondents feel that the lack of foresight from the council should not justify the increase. That there is no straightforward evidence that supports an increase of the amount proposed. Some felt that the council could make cuts to other services, that money is wasted on other schemes, are insensitive to the current situation around costs. A small number of comments were not clear around the information that has been provided.
 - e) A few comments were critical of the transport service provided, noting that payments are not made easy, that they have problems with the conduct of the transport provider, or buses are often changed or late.
 - f) A small number of comments stated that the service should be free to align with the requirement to stay in education.
 - g) A small number of comments felt that having to make alternative choices due to a rise in cost for travel will lead to oversubscribed schools.
 - h) Suggestions were provided including that the cost should: be phased in incrementally, be based on a means test, not be increased for current students, be a lower amount, discounted for siblings, subsidised, remain at current cost, introduce greener travel to reduce operating costs, make ways to pay fairer.

1 comment has been received from a respondent that had no opinion on the matter noting that a card payment system would be better than the current.

3.5 Further comments

Respondents were invited to provide further views or comments on Home to School Transport or the Draft Home to School Transport Policy, that they had not already told us about. There were 232 comments that make up the following summary.

- Many respondents felt that the proposals would significantly disadvantage and also discriminate children, young people, and families. That they are unfair and feel that choice of school will be limited, or they have little choice, and that changes should not be made as will affect or deny education and place a burden on families.
- Some felt that the proposals will significantly impact those living in rural communities, and split some areas based on postcode. Others felt that the proposals would affect SEND and there needs to be more to support. Some felt that the proposals would affect working households and single parents, with working households having to question and consider their ability to work or make forced changes. Also, the potential impacts to parents and carers emotional and physical wellbeing.
- There are comments relating to stress and anxiety the proposals would cause, particularly with how children and young people deal with changes to routines, and the potential of exposure to busy roads, long journeys, and harsh weather.

- Several respondents felt that the financial burden is unfair, cost is too high, is pricing people out, is a cost saving exercise and having to pay more for an already poor service. That the proposals will contribute to general financial poverty and referred to the cost-of-living crisis.
- That the current service is not fit for purpose, not value for money, and the provision should be reviewed. Also, that the system is unfair and complex.
- There are concerns around road and route safety, and concerns about child safety, and not to do anything until all routes and safety issues have been considered.
- Some state that proposals should be fairer
- A few comments noted that provision should be free and should be free for 16 to 18-year-olds as they are made to be in education.
- Other comments included that proposals should only apply to new intakes, that costs should be subsidised, that more investment should be in greener ways to travel, that people need more help, that education should be easier to access, that a full review should be undertaken, proposals will negatively impact the environment, were critical of the thought around the proposals.

The last question sought detail about how the respondent heard about the consultation. There were 1105 responses to this question, and respondents could choose more than one answer. The most prevalent method of hearing about the consultation was from schools (56 per cent of all selections), followed via social media (25 per cent).

4 Written responses

There were 49 written responses received by email. They included responses from individuals, education providers, Councillors, and parish councils. The following provides an overview of the written comments provided in this way.

- The proposals will detrimentally impact working parents/carers, single parents/carers, vulnerable children and families, children with additional needs or SEND, those on low incomes, those who have no access to a vehicle, and the environment.
- Some concerned comments relate to the proposals that affect linked schools, due to the impact on rural localities.
- The choice is being taken away from children, young people, parents, and carers which will impact on education, general health, mental health, and wellbeing. Families are being forced to decide based on cost rather than what is best for children, young people, and their families.
- The cost of proposals is too much, not proportionate to inflation, not comparable with other geographical areas, puts pressures on families, is unreasonable, and unfairly punishes parents and carers that are responsible for more than one child.
- The changes will lead to oversubscription of schools, or undersubscription.
- The changes put children and young people at risk of harm and have safeguarding implications. Children should not be expected to walk great distances to attend school where it is completely unsuitable to do so.
- The timing of the events for more information was not thought out or effectively communicated.

- Comments were received regarding the council pushing a burden on to families, that it is unfair when it is an administrative error that increase has not been annual, that an equalities assessment should be provided as part of the consultation, that the proposals contradict admissions policies for schools, that the detail and the consultation has not been properly promoted, that some of the narrative and technical wording is not properly explained.
- Other comments suggest that the schools or the council subsidises transport, that access to education is a right, that evidence is needed, that "grandfather rights" should exist or the provision remain as it is, that costs should be reconsidered, that current provision works well, that there are concerns with the transport service, that changes will impact all.

Respondents that specifically referenced the proposed Spare Seat Scheme felt:

- It disadvantages and confuses those that are currently eligible, as they won't be in the future,
- That SEND should be prioritised,
- Causes confusion as implicates schools on administering the proposal,
- There is not enough notice.

Those that specifically referenced the proposal to remove the provision of transport for linked school's said:

- That the provision should remain as it is as the original choice was based on this,
- Changes will cause huge disruption,
- The detail around 'Linked schools' is not clear, and it is uncertain of who it applies to,
- It penalises children, parents, rural communities,
- It is not feasible to send all children to their nearest school,
- Changes will affect children's education and wellbeing,
- Will affect many as often the linked school is not the nearest.

Respondents that referenced the removal of provision for under 5's for mainstream schools noted:

- That it is unfair and discriminates parents and disadvantages children's development

Those that specifically references transport for those in year 11 who would not be entitled unless the move was due to an emergency gave the following comments:

- Should allow current provision to continue,
- It is unfair due to upheaval and during an important time of education

Rising 8's

- Unfair particularly on vulnerable and SEND children

Walking route

- Does not consider the rural areas
- There are few safe walking routes or are too far away as walking distances

Increase cost

- Too much in the current climate,

- Penalises parents and those that have no other option,
- Unfair to parents with more than one child,
- Affects those on low incomes,
- Not acceptable as the service is poor.

5 Feedback from consultation events

There were 5 people who chose to provide written feedback at the consultation events, the majority were parents, a support group representative and a community transport provider also attended. Others that attended these events advised that they were going to complete the online consultation. A summary of those who provided written feedback:

- Concern raised over the walking route criteria and if free transport would be ceased
- Concern for the removal of linked schools and an increase in charges for those non-entitled students, but would be supportive of "grandfather rights"
- Concern of the potential impact for SEND, and the removal of transport for children under 5
- There was interest in community transport being able to assist schools directly

A summary of other comments received at the consultation event, that did provide written feedback included:

- Questions around what linked means and how it impacts students, and younger siblings
- Questioned the impact on Post-16 students
- The cost from £600 to £1000 is excessive particularly in the current cost of living crisis
- Questioned if the cost could be phased
- Raised concern over the walking route assessment and the loss of free transport.

End of report

Appendix B

List of Geographically Associated Schools

Primary Schools

Badby Primary School	Everdon, Fawsley and Little Everdon
Blakesley CE Primary School	Adstone, Farthingstone, Foxley, Litchborough, Maidford and Woodend
Braunston CE Primary School	Onley Park
Brackley C of E Junior School	Halse, Radstone, Steane and Whitfield
Brington Primary School	Nobottle, Whilton and Whilton Locks
Brixworth CEVC Primary School	Scaldwell
Clipston Endowed VC Primary School	Arthingworth, East Farndon, Great Oxendon, Kelmarsh, Little Oxendon and Marston Trussell
Culworth CEVA Primary Academy	Moreton Pinkney, Sulgrave and Thorpe Mandeville
Deanshanger Primary School	Wicken
Denton Primary School	Brafield on the Green
Greatworth Primary School	Marston St Lawrence
Greens Norton CE Primary School	Bradden and Slapton
Grendon CE Primary School	Castle Ashby and Chadstone
Guilborough CEVA Primary School	Cold Ashby, Coton, Cottesbrooke, Hollowell, Ravensthorpe, Teeton and Thornby
Helmdon Primary School	Astwell and Falcutt
Little Houghton CEVA Primary School	Great Houghton
Long Buckby Infant School	Buckby Wharf and Watford
Long Buckby Junior School	Buckby Wharf and Watford
Maidwell Primary School	Hanging Houghton and Lamport
Middleton Cheney Primary Academy	Overthorpe and Warkworth
Newbottle & Charlton CEVA Primary School	Aynho
Pattishall CE Primary School	Cold Higham, Fosters Booth and Grimscote
Paulerspury CE School	Alderton and Pury End
Silverstone CE Primary School	Abthorpe and Wappenham
Southfield Primary Academy	Evenley and Hinton in the Hedges
Staverton CE Primary School	Catesby and Hellidon
Upton Meadows Primary School	Banbury Lane
Walgrave Primary School	Hannington, Holcot and Old inc. Cherry Tree Estate
Waynflete Infant School	Halse, Radstone, Steane and Whitfield
Welford Sibbertoft and Sulby Endowed School	Sibbertoft and Sulby
Welton CE Academy	Ashby St Ledgers
Woodford Halse CE Primary Academy	Canons Ashby, Charwelton, Eydon, Little Preston, Preston Capes and West Farndon
Wootton Primary School	Courteenhall and Quinton
Yardley Gobion CE Primary School	Grafton Regis
Yelvertoft Primary School	Clay Coton and Lilbourne

Secondary Schools

Campion School	Astcote, Banbury Lane (Ashpole Spinney), Brockhall, Cold Higham, Cornhill, Dalscote, Eastcote, Flore, Fosters Booth, Gayton, Great Brington, Grimscote, Harpole, Kislingbury, Little Brington, Lower Heyford, Milton Malsor, Nether Heyford, Nobottle, Pattishall, Pineham Barns, Rothersthorpe, Upper Heyford, Upton Grange, Whilton and Whilton Locks
Caroline Chisholm School	Courteenhall and Quinton
Chenderit School	Appletree, Aston le Walls, Chacombe, Chipping Warden, Culworth, Edgcote, Farthinghoe, Greatworth, King Sutton, Lois Weedon, Lower Boddington, Marston St Lawrence, Moreton Pinkney, Overthorpe, Plumpton, Stuchbury, Sulgrave, Thenford, Thorpe Mandeville, Upper Boddington, Warkworth and Weston
Danetre and Southbrook Learning Village (DSLVL)	Badby, Byfield, Canons Ashby, Charwelton, Dodford, Everdon, Eydon, Fawsley, Little Preston, Newnham, Preston Capes, Stowe IX Churches, Upper Stowe, Weedon and Woodford Halse
Elizabeth Woodville School, North Campus (The)	Ashton, Blisworth, Collingtree, Collingtree Park (South of the water), Grange Park, Hackleton, Hardingstone, Hartwell, Horton, Piddington, Preston Deanery, Salcey Forest, Shutlanger and Stoke Bruerne
Elizabeth Woodville School, South Campus (The)	Alderton, Cosgrove, Grafton Regis, Old Stratford, Paulerspury, Potterspury, Pury End, Puxley, Wicken and Yardley Gobion
Guilsborough School	Arthingworth, Buckby Wharf, Clay Coton, Clipston, Cold Ashby, Coton, Cottesbrooke, Creaton, Crick, East Farndon, East Haddon, Elkington, Great Creaton, Great Oxendon, Haselbech, Holdenby, Hollowell, Hothorpe, Kelmarsh, Lilbourne, Long Buckby, Marston Trussell, Murcott, Naseby, Ravensthorpe, Sibbertoft, Spratton, Sulby, Teeton, Thornby, Watford, Welford, West Haddon, Winwick and Yelvertoft
Magdalen College School	Astwell, Aynho, Charlton, Croughton, Crowfield, Evenley, Falcutt, Halse, Helmdon, Hinton in the Hedges, Newbottle, Pimlico, Radstone, Steane, Syresham and Whitfield
Montsaye Academy	Draughton, Hanging Houghton, Lamport. Maidwell
Moulton School & Science College	Althorp, Boughton, Brixworth, Buckton Fields, Chapel Brampton, Church Brampton, Hannington, Harlestone, Holcot, Old, Pitsford, Scaldwell, Upper Harlestone and Walgrave
Parker E-Act Academy (The)	Ashby St Ledgers, Barby, Braunston, Catesby, Hellidon, Kilsby, Onley Park, Staverton and Welton

Sponne School	Abthorpe, Adstone, Blakesley, Bradden, Caldecote, Farthingstone, Foxley, Greens Norton, Litchborough, Maidford, Silverstone, Slapton, Tiffeld, Wappenham, Whittlebury and Woodend
Wollaston School	Brafield on the Green, Caste Ashby, Chadstone, Cogenhoe, Denton, Great Houghton, Little Houghton, Whiston and Yardley Hastings

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APPENDIX C



Spare Seat Scheme – Mainstream and SEND Students

How the scheme works

If your child is not eligible for free school transport, you may be able to receive discretionary transport assistance through our Spare Seats Scheme.

If there are empty seats on the services we contract for children who are eligible for free travel, we can offer these seats to other children who are not eligible. This is only available on existing transport, where there is a space and we cannot make any special arrangements to routes or times.

Seats can only be offered after the start of the academic year and after children who are eligible for free school transport have been allocated a seat. This may take a number of weeks as we continue to receive applications during September and October for eligible children and therefore, we are not able to offer a seat before the October half term.

We offer this scheme annually, so you must re-apply each year. There is no guarantee that the scheme will always be available and even if you are offered a seat when you apply, it may not be possible to offer a seat to you in subsequent years.

We will only contact you if we are able to offer a seat. If you do not hear from us, then regrettably we have been unable to offer your child a seat and you will need to continue to make your own arrangements.

How we prioritise applications

Spare seats will be limited and applications are prioritised in the following order:

1. Non entitled children with special educational needs or disability
2. Looked After Children or former Looked After Children who have been adopted
3. Children of Armed Forces personnel, in line with our duty as part of the West Northamptonshire Armed Forces Covenant
4. Non entitled mainstream children
5. Siblings of students allocated a place under priority 1 above, and siblings of eligible students travelling on the same route

How much does it cost

The cost of the scheme for the academic year starting September 2024 is £1,000 and this is reviewed annually and published in May each year.

Parents who are offered a seat will receive an invoice for the full amount between October and December along with instructions on how to arrange monthly instalments or pay in full.

How to apply

If you want to be considered for the scheme, you will need to complete the Spare Seat Scheme application form which is available on our website.

Applications will be open from the 1st September and will remain open until the 30th September.

If you cannot get a spare seat

The number of spare seats we can offer is limited, so you shouldn't rely on our spare seat scheme to get your child to and from school. It is therefore important to ensure you have alternative means of getting your child to and from school.

Right to withdraw passes

Please note that the Council reserves the right to withdraw a spare seat offered under this scheme where late applications are received for a child who is eligible for free travel assistance. The Council will provide 1 months' notice to allow parents to put in place alternative arrangements.

APPENDIX D

Guidelines for Assessing Walking Routes

West Northants Council has a duty to promote sustainable travel and encouraging children to walk and cycle to school helps keep them healthy, improves mental wellbeing, eases congestion and reduces toxins in the air.

Children’s safety is paramount and our walking route criteria will seek to ensure that safety is not compromised when travelling to and from school. Walking routes will be assessed by carrying out desktop analysis and where necessary site visits and assessments will be undertaken so that routes children are expected to walk are safe.

Parental Responsibility

- There is a general expectation that a child will be accompanied by a parent, carer or responsible adult where necessary, unless there is a good reason why it is not reasonable to expect them to do so. A route does not fail to qualify as safe because of dangers which would arise if the child were to be unaccompanied.
- Parents should ensure that a child has suitable clothing and equipment for the journey (for example, boots, wet weather clothing, reflective bands, and torch). Conditions such as muddy footpaths or lack of lighting do not mean that a route is unsafe, and it is expected that these issues can be overcome with suitable clothing and basic equipment.
- Where it would normally be expected that a child should be accompanied, and the parent or carer has a special educational need or disability that prevents them doing so, then transport may be provided. In these circumstances such a decision will not set a precedent for the route or mean that the route is deemed hazardous for other children who can be accompanied as necessary.

The Council will take the following factors into account:

We will consider:
Road width, visibility and the severity of bends
Existence of 'safe refuge' including footpaths and verges, road markings at the side of the road
Existence of Rights of Way, Permitted Paths and Bridle Paths
Existence of canals, rivers and ditches which could pose a hazard
In the absence of a footway, verge, roadside strip, and/or formal crossing points along the route, the Council will consider: <ol style="list-style-type: none"> 1. The volume of traffic at the relevant period of day 2. The type of traffic and its relative speed 3. Difficulty of road crossings 4. The accident record along the route 5. Visibility between the pedestrian and oncoming vehicles.
Nature of road (urban/rural) and driver expectation
The presence or otherwise of speed limits and other warning signs

We will not consider:
Isolation of route
Weather conditions
Transient events - road closures, construction work, seasonal weather (e.g., flooding, snow, ice)

Temporary surface conditions (e.g., mud, puddles)
Lack of street lighting
The presence of uncut hedges
Difficult terrain/arduousness of the route - steep hills are not a hazard

Measurement of Route

- The measurement of the statutory walking distances is not necessarily the shortest distance by road. It is measured by the shortest route along which a child, accompanied as necessary, may walk safely, and this may include footpaths, bridleways, and other pathways, as well as recognised roads.

Footpaths

- Where there is a footpath or roadside strip, the route will normally be considered suitable. A verge, which can be stepped onto, will also be regarded normally as rendering the route safe for walkers.

Width of Road

- Even without a footpath, a road which is wider than 5.5 metres will normally be considered safe for walkers.
- A narrow road is not necessarily dangerous simply because it is narrow. If the width is less than 5.5 metres, traffic frequency and vehicle types will be considered.

Road Crossing

- Where a route involves crossing a road, the route will normally be considered acceptable where official crossing points are provided.
- In other cases, traffic flow, vehicle speed, road width and visibility in both directions will be considered.

Traffic Frequency

- The traffic frequency at the beginning and end of the school day is the relevant traffic frequency. This is likely to be the busiest period.
- Where a route or part of a route does not have a footway, traffic frequency will be considered together with the composition of the traffic, the width of the road and the provision of refuges for walkers.
- In the absence of a formal crossing point, where the two-way (one way of a dual carriageway) traffic flow is below 240 vehicles per hour the road is assessed as safe to cross. This is based on the original County Road Safety Officers Association criteria and is equivalent to 1 vehicle every 15 seconds and allows a reasonable gap time to cross a 7m wide road at a walking speed of 3ft per second. If the site assessment shows that the traffic flow is more than the above, and limits the opportunity to cross, then a gap count may be undertaken.

Appeals

Parent or carers will be entitled to appeal against the decision of the Council on grounds of the suitability of the walking route. Where a parent or carer appeals our decision, the route will be assessed by an independent road safety specialist.

APPENDIX E

West Northamptonshire Council

Home to School Education Transport

September 2024 – July 2025

Version	Author	Date	Changes
V 01	Head of Transport Delivery	March 2023	Draft Policy for Consultation
V 02	Head of Transport Delivery	June 2023	Policy for Implementation

Contents

1. Introduction	3
2. West Northamptonshire Council Policy	3
3. Free Travel Arrangements	3
4. Transport for Post 16 students	5
5. Travel arrangements for non-entitled pupils/students aged 4 to 16	6
6. Travel arrangements for pupils with SEN or a Disability.....	6
7. Exceptional circumstances.....	7
8. Passenger assistants	8
9. Transport to and from out of area residential schools	8
10. Short Break Service	8
11. Pick up and set down points	8
12. Appeal and Complaints Procedures.....	9
13. Quality Standards and Responsibilities.....	9
14. Behaviour and parental responsibilities	10
15. Quality of Service	10
16. Promote Sustainable School Travel	11
Appendix A1- Low Income Criteria for Extended Rights Home to School Transport.....	12
Appendix A2 - List of Geographically Associated Schools.....	13

West Northamptonshire Council

Home to School Transport Policy

1. Introduction

- 1.1 This policy sets out West Northamptonshire Council's obligations to provide home to school transport to children living in West Northamptonshire who are eligible to receive transport assistance. If you do not reside or pay council tax to the council, you will not be eligible for support. Please contact your own local council to find out details of their transport policy and how to apply.
- 1.2 Local Authorities are under a statutory duty to have regard to the Education Act 1996 and Schedule 35B of the Act which was inserted by Part 6 of the Education and Inspections Act 2006. Sections 508B and 508C of the Act makes provision for Local Authorities to ensure that suitable travel arrangements are made, where necessary, to facilitate a child's attendance at school. West Northamptonshire Council has developed its transport policy in accordance with the relevant legislation to ensure it is able to meet its statutory duty for pupils of compulsory school age up to Year 11.
- 1.3 Transport Provision is different for pupils in Year 12 onwards, which is explained in more detail in the relevant section of this policy.
- 1.4 West Northamptonshire Council must have regard to any statutory guidance published by the Secretary of State in the Department for Education.

2. West Northamptonshire Council Policy

- 2.1 West Northamptonshire Council (the Council) recognises parents'/carers' responsibility for ensuring attendance of their children at school. It also recognises that in some circumstances assistance may be required. Please note that all school transport will normally only pick up and set down at or near the pupil's home address as shown on the school roll and Council's records.
- 2.2 Compulsory School Age is set out in section 8 of the Education Act 1996 and The Education (Start of Compulsory School Age) Order 1998. It is defined as "a child reaches compulsory school age on the prescribed day following their fifth birthday, or on their fifth birthday if it falls on a prescribed day. The prescribed days are 31 December, 31 March and 31 August".
- 2.3 A child ceases to be of compulsory school age on the last Friday in June in the school year in which they reach age 16.

3. Free Travel Arrangements

- 3.1 The Council will provide or arrange free travel arrangements either by dedicated vehicle or bus pass for the following pupils:
 - (i) **Pupils aged 4 to 8 years** attending their nearest suitable* or Geographically Associated** School and who live more than 2 miles from that school.

- (ii) **Pupils aged 8 to 16 years** attending their nearest suitable* school or Geographically Associated School** and who live more than 3 miles from that school (but see (iv) and (v) below for exceptions)
- (iii) **Pupils aged 4 to 16 years whose walking routes are unsafe:** where pupils are attending their nearest suitable* or Geographically Associated School** and the walking route to school is less than the distances set out in (i) and (ii) above but **where the route is assessed as unsafe to walk** according to the Council's published criteria. This criteria is reviewed annually and is subject to change and is available on the Council's website or on request.

**Suitable school i.e. the school with places available that provides education appropriate to the age, ability and aptitude of the child, and any SEN that the child might have.*

***Geographically Associated School i.e. a school which is not a pupil's nearest but is included in the list of schools and their geographical associations (see appendix A2).*

- (iv) **Pupils aged 8 but under 11 entitled to free school meals, or those whose parents are in receipt of Universal Credit or maximum level of Working Tax Credit:** pupils aged 8 but under 11 entitled to free school meals or whose parents are in receipt of Universal Credit or the maximum level of Working Tax Credit (WTC) receive free transport to their nearest suitable school if they live more than 2 miles from that school. This 2 mile limit will be measured in the same way as the statutory walking distance. Parents/carers will need to apply to the Council for assistance once their child reaches the age of 8. If eligibility for free school meals or Universal Credit or maximum level Working Tax Credit ceases, then free transport will be withdrawn at the end of the academic year.
- (v) **Pupils aged 11 to 16 entitled to free school meals, or those whose parents are in receipt of their maximum level of Universal Credit or Working Tax Credit:** pupils aged 11 to 16 entitled to free school meals or whose families are in receipt of their maximum level of Universal Credit or Working Tax Credit (WTC) will receive free transport to one of the three nearest schools to their home address which are over 2 miles (measured by an acceptable walking route) and less than 6 miles (measured by the shortest road route). Additionally, pupils who can demonstrate that they have gained a place at a school because of their or their family's religion or belief then the upper limit is extended to 15 miles from the pupil's home address (measured by the shortest road route). If eligibility for free school meals or Universal Credit or maximum level Working Tax Credit ceases, then free transport will be withdrawn at the end of the academic year.

A full list of the low income qualifying criteria is available in Appendix A1 attached to this policy.

- (vi) **Pupils aged 4 to 16 years attending Single Sex or Faith (Denominational) Schools**

The Council will only offer assistance with transport to single sex or faith schools if any of the following apply:

1. the school concerned is the nearest suitable school and the distance between home and school is greater than 2 miles (pupils aged 5 to 8) or 3 miles (pupils aged 8 to 16) by the shortest walking route; **OR**
2. the school concerned is the nearest suitable school and the distance between home and school is less than the distances in (1) above but is along a route considered by the Council to be an unsafe route on grounds of safety; **OR**
3. the pupil is entitled to free school meals or their parents are in receipt of their maximum level of Universal Credit or Working Tax Credit (see Sections (iv) and (v) above.

(vii) **Pupils aged 4 to 16 whose parents/carers have a disability.** Where the Council relies on a parent/carer accompanying a pupil along a walking route for it to be considered safe, *or to accompany a pupil between home and a picking up or setting down point* but the parent's or carer's permanent or temporary disability prevents them from doing so, then the Council may provide free transport as a "reasonable adjustment" under the terms of the Equality Act 2010.

(viii) **Pupils aged 4 to 16 with SEN or a disability.** Where a pupil is attending their nearest suitable school, and they have a condition where they cannot reasonably be expected to walk, and this is supported by appropriate medical and/or specialist advice, then the Council will make suitable travel arrangements (see also Section 2.5 Travel arrangements for pupils with SEN or a disability).

(ix) **Post 16 students** in certain stated categories as set out in the Council's Post-16 Transport Policy Statement.

3.2 Parents/carers of pupils who move home address during their schooling to an area where another school is the nearest suitable school may either:

- apply to move their child to the nearest suitable school for their new address and if successful the policy stated above will apply **or**:
- retain the child's place at their current school but they will become responsible for the child's transport provision and costs.

3.3 If there are no places available at schools nearer to the new home address than the current school, then the Council will provide free travel to the current school subject to the criteria outlined in paragraph 3.1 above.

3.4 If parents/carers elect to move a pupil to a school that is not the nearest suitable school to their home address then they will become responsible for the child's transport provision and any associated costs. Bullying, poor educational achievement and similar factors will not normally be considered as exceptional circumstances.

4. Transport for Post 16 students

4.1 Post-16 transport provision is set out in the Council's 'Post-16 Transport Policy Statement' which is available on the Council's website or on request.

5. Travel arrangements for non-entitled pupils/students aged 4 to 16

- 5.1 Travel arrangements for non-entitled pupils aged 4 to 16 may be available from time to time however this will be subject to spare capacity being available on existing home to school contracted services. Spare capacity will be offered in a priority order and details of the Spare Seat Scheme is available on the Council's website and will be reviewed annually and may be subject to change.
- 5.2 The cost of the scheme will be reviewed annually and may change, and parents and carers should therefore not rely on this scheme to ensure their child can travel to and from school for the entirety of their schooling as seats are not guaranteed.
- 5.3 Additional vehicles will not be contracted to cater for non-entitled pupils and the Council may retain a number of spare seats to cater for those pupils who may become eligible for transport at any point during the school year. Parents/carers will be advised that the facility could be withdrawn at reasonable notice which shall be not less than one month in which case they will be refunded for the remainder of the fare period.
- 5.4 Parents/carers of pupils who have chosen and have accepted a place at a school that is not their nearest suitable school, are responsible for transporting their child to and from school including any costs associated with this.

6. Travel arrangements for pupils with SEN or a Disability

Principles

- 6.1 This policy seeks to support and encourage the development of independence and promotes the use of independent travel training for children and young adults. It is the responsibility of all parents/carers with children of compulsory school age to ensure their child's regular attendance at school and where a pupil cannot travel to school alone, a pupil can be expected to travel accompanied by a responsible adult. For pupils with special educational needs, each case is considered individually, guided by the criteria below:

Procedures

- 6.2 Eligibility for free travel arrangements for pupils with SEN or a disability is considered with reference to this policy and parents and carers will need to submit an application for transport once their child has received confirmation of their school place. The application form can be accessed using the following link:

<https://www.westnorthants.gov.uk/school-travel-assistance/special-educational-needs-travel-assistance>

Criteria for agreeing home to school travel arrangements for pupils with SEN or a disability

6.3 General Points

- Special Educational Needs travel arrangements will be reviewed if the pupil moves address.
- Special equipment i.e. wheelchairs etc must be approved by the Council before transportation including any changes. All non-standard passenger and wheelchair harnesses and restraints must be supplied by the parents/carers.

- Special Educational Needs travel arrangements will be reviewed as part of the pupils' annual review process.

6.4 Travel arrangements will be agreed for pupils with SEN, disability or mobility problem where:

- The pupil is attending their nearest suitable school as determined by the Council, and the distance is in excess of the statutory walking distance;
- Where the distance is below the statutory walking distance and the pupil has a condition where they cannot reasonably be expected to walk to and from school because of their special educational needs, disability or mobility problem, the Council may require detailed written advice from an appropriate professional to support this.

6.5 In determining whether a pupil cannot reasonably be expected to walk due to their special educational needs, restricted mobility or disability, the Council will consider whether the pupil could reasonably be expected to walk if accompanied and if so, whether their parent or carer can reasonably be expected to accompany them.

6.6 The general expectation is that a pupil will be accompanied by a parent where necessary. Where a parent or carer may be working at the time their child is travelling to or from school, they will be expected to put in place suitable alternative arrangements.

6.7 The Council will consider each case on its own merits and take account of the individual family circumstances which prevent them from accompanying their child when determining whether travel assistance is required.

6.8 Travel arrangements will not be allocated where:

- the pupil is not attending their nearest school, or the nearest suitable special provision, and the school is a parental preference.
- Where a pupil is attending more than one educational establishment or setting, the Council will only provide travel assistance to that which is named in their EHCP as determined by the Council.

6.9 Travel assistance is provided at the normal start and finish times of the school day. Assistance is not normally available for part time attendance and such requests will be considered individually on it's own merits and on a cases by case basis in accordance with the exceptional circumstances criteria below.

7. Exceptional circumstances

7.1 The Council will consider exceptional circumstances on a case by case basis and some examples of where the Council may exercise its discretion to provide free home to school travel arrangements are as follows:

- Where there are two or more children in a family (living at the same address) and where for one child the Council has determined special provision making it impossible for the parent to make arrangements.
- Where a pupil faces a temporary medical problem which affects their mobility so that they are unable to access school without support and school has

considered reasonable adjustments. In these cases, consideration will be given to family circumstances and to medical advice.

- Where a family has to move suddenly to temporary accommodation, for example, because of a house fire or domestic violence, temporary support may be available.
- Where a pupil is being assessed for an EHCP, or has been placed at a setting under the Council's Fair Access Protocol, travel assistance may be available.

8. Passenger assistants

8.1 The provision of a passenger assistant may be agreed on the basis of the pupil's age, special educational need and/or disability.

8.2 Passenger assistants are given PATS (Passenger Assistant Training Scheme) training. This is a nationally recognised standard for passenger assistants.

8.3 Passenger assistants are not trained to administer medication or undertake any medical procedures whilst accompanying pupils. In the event of an emergency, they will call the emergency services or ask the driver to travel to the nearest medical facility.

8.4 Passenger assistants are intended to be provided where:

- It is necessary in the interests of safety, taking into account the special needs of the pupil or pupils being transported.
- A specially adapted vehicle that requires additional assistance is used.

8.5 Parents/carers or relatives of children who are travelling in sole occupancy vehicles, or who have acute medical needs, may volunteer to accompany their child / children by mutual agreement with the Transport Team.

9. Transport to and from out of area residential schools

9.1 Where a residential school or Independent School is named in a child's EHC plan and the parent is in agreement to transport their child, mileage can be claimed at the agreed rate on a termly basis.

9.2 Where parent/carer transport is not possible, children on termly placements (i.e. 3 terms a year) will be provided with transport at the start and end of each term and half term holiday. In addition, a mileage allowance at the agreed rate may be claimed for one visit to the school each half term. For weekly placements, weekly transport will be provided.

10. Short Break Service

10.1 The Council has no responsibility to provide home to school travel arrangements for children to and from respite care facilities.

11. Pick up and set down points

11.1 Assistance with transport may not be door to door. Pupils, accompanied by an adult if necessary, may be expected to walk to and from a pick up and set down point. The walking

distance will not exceed ½ a mile for pupils aged between 4 – 8 years and 1 mile for pupil aged between 8 and 16, but account will be taken of a pupil's special educational needs, disability or mobility problem as well as parents/carers' disability.

11.2 Where a parent is unable to accompany their child, this will be considered under exceptional circumstances as outlined in section 7 above.

12. Appeal and Complaints Procedures

12.1 The statutory guidance states that there should be a clear and transparent two stage process to enable parents or carers to appeal against the Council's decision in relation to home to school travel for a pupil. A decision may be challenged on the following grounds:

- eligibility
- distance measurement
- safety of the route; and/or
- transport arrangements offered

12.2 Full details of the appeal procedures for home to school transport are available on the Council's website (www.westnorthants.gov.uk).

12.3 Should a parent/guardian/carer be unhappy with the level of service provided by the Council and/or its transport providers, then information on how to make a formal complaint is available using the link below:

<https://www.westnorthants.gov.uk/your-council/comments-compliments-and-complaints>

13. Quality Standards and Responsibilities

13.1 A child's safety and welfare is always the main priority.

- Where appropriate all vehicles used or contracted by the Council are fitted with the standard seat belts, child seats and special equipment. Specialised equipment must be supplied by the parents.
- PATS trained passenger assistants are intended to be made available where necessary.
- All children will be independently seated one seat per child.
- All passenger assistants will be approved by West Northamptonshire Council. Passenger assistants will carry an ID badge at all times.
- Vehicles contracted by the Council are expected to be licensed appropriately; this is a condition of the contract.
- All drivers must be licensed appropriately and should carry an identification badge at all times.
- All drivers and passenger assistants employed by the Council will be checked as appropriate in accordance with the Disclosure and Barring Service (DBS).

- Drivers employed on contracted vehicles are subject to DBS checks by their employer.
- All vehicles, drivers and passenger assistants will be subject to random checks by Council inspectors.

14. Behaviour and parental responsibilities

14.1 Pupils have a right to safe and trouble free travel. Pupils are expected to behave in a safe and appropriate manner as set out in the Transport Service Agreement supplied to parents/carers. If a pupil behaves in such a way that it may cause or risk harm, or cause upset and disruption to other travellers, transport provision may be temporarily or permanently withdrawn. Please refer to the Council's Code of Conduct for examples of what is unacceptable behaviour. The Council has ensured that these conditions are subject to the relevant provisions of the Equalities Act 2010 and the Public Sector Equality Duties and will be reviewed annually.

14.2 Parents/carers have a key role to play regarding the conduct of their children on transport and are responsible for ensuring that their children are aware of the necessity to behave in a reasonable and responsible manner. Parent/carers need to ensure their child is aware that failure to behave in a reasonable manner may have consequences, including:

- a cost to parents/carers for replacement travel permits if lost or damaged;
- cost to parents/carers for damage to the vehicle or to property caused by misbehaviour of their children;
- Temporary or permanent withdrawal of free transport with no recompense and no right of appeal.

14.3 Parents/carers of children with a home collection/drop-off are required to ensure their child is ready immediately when the vehicle arrives at the normal home address or pick up point. Parents/carers are also required to ensure they or their representatives are available to meet the child at the normal home address or drop off point at the end of the school day. They must advise the passenger assistant, if there is a particular difficulty with their child and ensure their child understands the standard of behaviour required or accept responsibility for their child's behaviour.

14.4 Where a parent/carer agrees to convey their child when no transport is available, expenses for two return journeys per day will be paid at the locally agreed rates.

15. Quality of Service

15.1 Applications for bus passes can be obtained from schools or from the Transport team at West Northamptonshire Council. Requests will be responded to within 10 days.

15.2 Pupils who qualify for assistance in the form of a bus pass can expect to receive the bus pass within 4 weeks of the application being received by West Northamptonshire Council.

15.3 Pupils who have had their bus pass stolen/lost can expect to receive a replacement within 7 days of the loss being reported to West Northamptonshire Council.

15.4 Reasonable requests for travel expenses will be considered by the Council if the above deadlines are not met.

15.5 Parents/carers of pupils who have an EHC plan will receive a letter before the term commences in September detailing their child's travel arrangements. Timings given at this point are approximate and may change throughout the year. Any disruption will be kept to a minimum.

16. Promote Sustainable School Travel

16.1 The Council will continue to identify opportunities to support independent and sustainable travel to and from school including:

- Assessment of the travel and transport needs of children and young people in West Northamptonshire.
- Review sustainable travel and transport infrastructure within West Northamptonshire that may be used when travelling to and from schools and colleges and promote sustainable travel options.
- Consider infrastructure improvements to better cater for the travel needs of children and young people.
- In conjunction with schools and colleges, the Council will be implementing a scheme that will support children and young people travelling independently to and from education and training facilities.

Appendix A1- Low Income Criteria for Extended Rights Home to School Transport

West Northamptonshire Council

Low Income Criteria for Extended Rights Home to School Transport

If you are in receipt of any of the following, your child may be eligible for free Home to School Transport under the extended rights criteria. You also need to meet the other qualifying criteria set out in section 3.1 items iv and v of the Home to School Transport Policy.

Below is the Low Income qualifying criteria which is the same as for free school meals for children in year 3 or above:

- Income Support
- Income based Job Seekers Allowance
- Income related Employment and Support Allowance
- Support under Part VI of the Immigration and Asylum Act 1999
- Child Tax Credit, with no element of Working Tax Credit, and a household income below £16,385pa (as assessed by HM Revenue and Customs)
- Maximum level Working Tax Credit
- Guarantee Element of State Pension Credit
- Universal Credit (provided families have an annual net earned income of no more than £7,400, as confirmed by earnings from up to the three most recent assessment periods).

A child must reside with the applicant to receive free school meals.

Transport that is granted under the extended rights eligibility below is reviewed on an annual basis. Where, during the course of a school year, a child ceases to be eligible for free school meals, or their parent ceases to receive maximum Working Tax Credit, the Council will continue the provision of free home to school travel for the remainder of that school year.

Low Income Criteria for Extended Rights Home to School Transport will be reviewed annually and adjusted in accordance with any changes to the criteria issued by Government.

Appendix A2 - List of Geographically Associated Schools

Primary Schools

School	Village or town associated
Badby Primary School	Everdon, Fawsley and Little Everdon
Blakesley CE Primary School	Adstone, Farthingstone, Foxley, Litchborough, Maidford and Woodend
Braunston CE Primary School	Onley Park
Brackley C of E Junior School	Halse, Radstone, Steane and Whitfield
Brington Primary School	Nobottle, Whilton and Whilton Locks
Brixworth CEVC Primary School	Scaldwell
Clipston Endowed VC Primary School	Arthingworth, East Farndon, Great Oxendon, Kelmars, Little Oxendon and Marston Trussell
Culworth CEVA Primary Academy	Moreton Pinkney, Sulgrave and Thorpe Mandeville
Deanshanger Primary School	Wicken
Denton Primary School	Brafield on the Green
Greatworth Primary School	Marston St Lawrence
Greens Norton CE Primary School	Bradden and Slapton
Grendon CE Primary School	Castle Ashby and Chadstone
Guilsborough CEVA Primary School	Cold Ashby, Coton, Cottesbrooke, Hollowell, Ravensthorpe, Teeton and Thornby
Helmdon Primary School	Astwell and Falcutt
Little Houghton CEVA Primary School	Great Houghton
Long Buckby Infant School	Buckby Wharf and Watford
Long Buckby Junior School	Buckby Wharf and Watford
Maidwell Primary School	Hanging Houghton and Lamport
Middleton Cheney Primary Academy	Overthorpe and Warkworth
Newbottle & Charlton CEVA Primary School	Aynho
Pattishall CE Primary School	Cold Higham, Fosters Booth and Grimscote
Paulerspury CE School	Alderton and Pury End
Silverstone CE Primary School	Abthorpe and Wappenham
Southfield Primary Academy	Evenley and Hinton in the Hedges
Staverton CE Primary School	Catesby and Hellidon
Upton Meadows Primary School	Banbury Lane
Walgrave Primary School	Hannington, Holcot and Old inc. Cherry Tree Estate
Waynflete Infant School	Halse, Radstone, Steane and Whitfield
Welford Sibbertoft and Sulby Endowed School	Sibbertoft and Sulby
Welton CE Academy	Ashby St Ledgers
Woodford Halse CE Primary Academy	Canons Ashby, Charwelton, Eydon, Little Preston, Preston Capes and West Farndon
Wootton Primary School	Courteenhall and Quinton
Yardley Gobion CE Primary School	Grafton Regis
Yelvertoft Primary School	Clay Coton and Lilbourne

Secondary Schools

School	Village or town associated
Campion School	Astcote, Banbury Lane (Ashpole Spinney), Brockhall, Cold Higham, Cornhill, Dalscote, Eastcote, Flore, Fosters Booth, Gayton, Great Brington, Grimscote, Harpole, Kislingbury, Little Brington, Lower Heyford, Milton Malsor, Nether Heyford, Nobottle, Pattishall, Pineham Barns, Rothersthorpe, Upper Heyford, Upton Grange, Whilton and Whilton Locks
Caroline Chisholm School	Courteenhall and Quinton
Chenderit School	Appletree, Aston le Walls, Chacombe, Chipping Warden, Culworth, Edgcote, Farthinghoe, Greatworth, King Sutton, Lois Weedon, Lower Boddington, Marston St Lawrence, Moreton Pinkney, Overthorpe, Plumpton, Stuchbury, Sulgrave, Thenford, Thorpe Mandeville, Upper Boddington, Warkworth and Weston
Danetre and Southbrook Learning Village (DSLVS)	Badby, Byfield, Canons Ashby, Charwelton, Dodford, Everdon, Eydon, Fawsley, Little Preston, Newnham, Preston Capes, Stowe IX Churches, Upper Stowe, Weedon and Woodford Halse
Elizabeth Woodville School, North Campus (The)	Ashton, Blisworth, Collingtree, Collingtree Park (South of the water), Grange Park, Hackleton, Hardingstone, Hartwell, Horton, Piddington, Preston Deanery, Salcey Forest, Shutlanger and Stoke Bruerne
Elizabeth Woodville School, South Campus (The)	Alderton, Cosgrove, Grafton Regis, Old Stratford, Paulerspury, Potterspury, Pury End, Puxley, Wicken and Yardley Gobion
Guilsborough School	Arthingworth, Buckby Wharf, Clay Coton, Clipston, Cold Ashby, Coton, Cottesbrooke, Creaton, Crick, East Farndon, East Haddon, Elkington, Great Creaton, Great Oxendon, Haselbech, Holdenby, Hollowell, Hothorpe, Kelmars, Lilbourne, Long Buckby, Marston Trussell, Murcott, Naseby, Ravensthorpe, Sibbertoft, Spratton, Sulby, Teeton, Thornby, Watford, Welford, West Haddon, Winwick and Yelvertoft
Magdalen College School	Astwell, Aynho, Charlton, Croughton, Crowfield, Evenley, Falcutt, Halse, Helmdon, Hinton in the Hedges, Newbottle, Pimlico, Radstone, Steane, Syresham and Whitfield
Montsaye Academy	Draughton, Hanging Houghton, Lamport. Maidwell
Moulton School & Science College	Althorp, Boughton, Brixworth, Buckton Fields, Chapel Brampton, Church Brampton, Hannington, Harlestone, Holcot, Old, Pitsford, Scaldwell, Upper Harlestone and Walgrave
Parker E-Act Academy (The)	Ashby St Ledgers, Barby, Braunston, Catesby, Hellidon, Kilsby, Onley Park, Staverton and Welton
Sponne School	Abthorpe, Adstone, Blakesley, Bradden, Caldecote, Farthingstone, Foxley, Greens Norton, Litchborough, Maidford, Silverstone, Slapton, Tiffield, Wappenham, Whittlebury and Woodend
Wollaston School	Brafield on the Green, Caste Ashby, Chadstone, Cogenhoe, Denton, Great Houghton, Little Houghton, Whiston and Yardley Hastings

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APPENDIX F

Transitional Arrangements

As a result of the implementation of a new Home to School Travel Policy and to mitigate some of the impacts, the following transitional arrangements will be implemented:

Spare Seats Scheme

Students who are currently guaranteed transport under the previous non-entitled scheme will continue to be guaranteed a seat until they either cease attendance at their current school or complete Year 11, whichever is sooner.

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WEST NORTHAMPTONSHIRE COUNCIL CABINET

11 July 2023

**Councillor Phil Larratt, Cabinet Member for Environment, Transport,
Highways and Waste**

Report Title	Highways Maintenance Machinery
Report Author	Nick Henstock, Assistant Director Highways and Transport, nick.henstock@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	21/06/2023
Chief Finance Officer (S.151)	Martin Henry	21/06/2023
Other Director	Stuart Timmiss	
Head of Communications	Becky Hutson	21/06/2023

List of Appendices

None

1. Purpose of Report

- 1.1 The report provides background information concerning the purchase of innovative machinery that significantly improves the efficiency and productivity to improve the condition of the road surfaces throughout West Northants

2. Executive Summary

- 2.1 The Council, through its budgetary processes, identified an increase in funding for the purpose of improving the condition of the highway. This funding of £1m was supplemented by funding

additional support from central government of £1.8m. Analysis of best practice elsewhere has identified that the purchase of additional machinery which focuses on larger scale patching and repairs will ensure we have a long-term benefit in productivity.

- 2.2 As a consequence of this purchase, it is acknowledged that we need to balance the capital investment with an ongoing capital and revenue investment ensuring that we maximise performance by utilising the machinery on a full-time basis. Due to the priority of this project orders have already been placed utilising the Highways Maintenance and Services Contract to purchase a JCB Pothole Pro and an additional Thermal Road Repair (TRR) machine.
- 2.3 The JCB Pothole Pro will enable twice the area of carriageway to be treated, whilst the TRR machine will allow one and a half times the area to be treated when compared to traditional methods utilising the same budget.
- 2.4 The purchase order is currently aligned to existing capital budgets which, if not supplemented, would result in a reduction to the 2023/24 capital maintenance programme, therefore the request, as set out, not only provides a long-term opportunity for continued improvement but ensures we maintain a full programme of renewal which will improve large stretches of highway.
- 2.5 The provision of an additional capital budget of £450,000 to fund the purchase will allow for the full 2023/24 programme to continue.

3. Recommendations

- 3.1 It is recommended that the Cabinet:
 - a) Note the contents of the report
 - b) Endorse the officer decision to purchase the additional highway maintenance machinery
 - c) Agree to allocate an additional capital budget of £450,000 to fund the purchase of the new machinery

4. Reason for Recommendations

- The recommended course of action will allow for an increase in productivity and efficiency of the Council's highway maintenance for this year and future years without the need to reduce the agreed 2023/24 capital maintenance programme.

5. Report Background

- 5.1 To improve the condition of the highway network within existing budget limits it is necessary to utilise more innovative, efficient methods of carrying out repairs.
- 5.2 Together with the Portfolio Holder and the Council's maintenance provider the Highway Service Manager has been investigating the best way to achieve this and has considered best practice and solutions that are currently available within the marketplace.

- 5.3 A visit was undertaken to Staffordshire to have a demonstration of JCB's new Pothole Pro machine at JCB's headquarters and a visit to Stoke to see the machine in operation and to discuss the use and potential of the machine with members of Stoke City Council's operational team.
- 5.4 The Pothole Pro is self-propelled machine that can travel to a site and quickly excavate an area of carriageway forming vertical joints and sweep the area collecting the arisings to load into a vehicle to be taken from the site. The resulting area can then be patched using traditional techniques i.e., hand laying or using a small paving machine depending on the size of the are being treated.
- 5.5 The council's existing TRR machine has been used by the highways maintenance contractor to deliver higher quality more efficient road repairs since the machine was purchased in 2020.
- 5.6 The TRR machine has several benefits when compared to a traditional repair gang:
- the repair creates a patch without joints which increases the longevity of the repair
 - the machinery uses less material to repair defects as it reuses existing material that would normally be excavated and disposed of.
 - The machine is less noisy than traditional treatment methods and so can be used at locations and times where noise is an issue.
 - the van that houses the machinery and the machine itself has solar panels that recharge the machine reducing its carbon footprint
- 5.7 The new machines will be used proactively in areas where there are several defects near each other to achieve a better repair. This reduces the likelihood of other potholes developing between smaller repairs and enables areas to be treated where not all defects at a location are currently at intervention level in a single visit, rather than carrying out smaller repairs and needing to return to the location when the other defects reach intervention levels.
- 5.8 The JCB Pothole Pro will enable twice the area of carriageway to be treated, whilst the TRR machine will allow one and a half times the area to be treated when compared to traditional methods utilising the same budget.

6. Issues and Choices

- 6.1 The decision has been taken to purchase one Pothole Pro and one additional TRR Machine. Delivery of the machinery is anticipated late in July / early August 2023 and will be operational shortly after this once training of the operatives is complete.
- 6.2 This purchase will be funded either from existing capital budgets resulting in a reduction to the planned programme of works in 2023/24 or from an additional capital budget, allowing the 2023/24 planned programme of works to continue in full.
- 6.3 If the existing budgets are required to fund the purchase, then the removal of schemes from the existing 2023/24 programme will result in additional deterioration of the sites and additional minor repairs may be required in the intervening period leading to pressure on the

revenue budget. The delay to the schemes will also result in those capital scheme costs increasing due to the additional deterioration and inflationary increases.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The additional capital budget required to purchase the machinery is £450,000. This will be funded through borrowing.

7.1.2 Existing capital budgets can fund these purchases, however in doing so it will be necessary to remove some schemes from the 2023/24 programme. This will result in the potential for these areas to deteriorate further requiring some repairs in the intervening period causing potential pressure on the 2023/24 revenue budget and also resulting in the scheme cost increasing due to the deterioration and inflationary increases.

7.1.3 The purchase of the machinery and the additional budget will ensure the most cost effective and efficient solution for pothole management in the local authority area.

7.2 Legal

7.2.1 There are no specific legal implications arising from the proposals.

7.2.2 By utilising the Highways Maintenance and Services Contract to purchase the machinery, the purchase is compliant with the Council's Contract Procedure Rules and the Public Contracts Regulations 2015.

7.3 Risk

7.3.1 The risk of not funding the machinery from an additional budget is that schemes in the 2023/24 programme will need to be pushed back into 2024/25 and these sites are likely to further deteriorate in the intervening period.

7.4 Consultation and Communications

7.4.1 No consultation has been carried out in relation to this proposal, however highways colleagues have engaged with contract partners at Kier to explore and ensure the most beneficial machinery for West Northants. The communications and engagement team will share information regarding the machinery and its expected outcomes with members of the public via the established communications channels in partnership with Kier Highways, the Council's Highways contract partner.

7.5 Consideration by Overview and Scrutiny

7.5.1 Overview and Scrutiny have not considered this proposal.

7.6 Climate Impact

7.6.1 The use of a TRR machine reduces the environmental impact of carrying out maintenance to the highway due to the reuse of all material on site with only a small quantity of additional material required to be added equivalent to any potholes etc within the area being repaired. It also utilises solar panels to provide the electrical power required for the machinery

7.6.2 The use of a Pothole Pro does not have a significant environmental impact compared to traditional methods or repair.

7.7 **Community Impact**

7.7.1 The machinery will be used across West Northamptonshire in areas of need and so there will be no differential impact on the communities in the authority.

8. **Background Papers**

8.1 None

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11th July 2023

**Cabinet Member for Housing, Culture and Leisure:
Councillor Adam Brown**

Report Title	Library Service Strategy 2023-27
Report Author	Carl Dorney – Head of Libraries, Museums and Community Hubs Carl.dorney@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	14/06/2023
Chief Finance Officer (S.151)	Martin Henry	14/06/2023
Other Director	Jane Carr	08/06/2023
Communications Lead/Head of Communications	Becky Hutson	14/06/2023

List of Appendices

Appendix A – Library Service Strategy 2023-27

1. Purpose of Report

- 1.1. This report is to introduce members to the proposed new draft strategy for the library service for the next 4 years and, subject to public and stakeholder consultation and any associated resulting amendments reported back through the portfolio holder, for the strategy to be formally adopted.

2. Executive Summary

- 1.2. This report provides the background around the current library service model in West Northamptonshire following a programme of service transformation, the local government reorganisation and post-pandemic recovery work.
- 1.3. It introduces the new 4-year draft strategy for the Library Service, setting out the 7 priorities and how these deliver against the WNC corporate priorities, the Integrated Care Northamptonshire Strategy “Live your best life” ambitions and the Libraries Connected Public Library Universal Offer.

3. Recommendations

It is recommended that the Cabinet approve the adoption of the draft strategy for the library service subject to public and stakeholder consultation, to be reported back through the portfolio holder, with any amendments, prior to finalisation and formal adoption.

Reason for Recommendations

- The proposed strategy will provide a framework against which the Library Service can deliver and maximise its role in the delivery of WNC corporate priorities.
- The proposed strategy will support the established model of community managed libraries enabling the Council to deliver vital services and support at a local level from community library venues.

4. Report Background

- 4.1 At the point of vesting day for West Northamptonshire Council the Northamptonshire Library Service was midway through a transformation programme which would see those libraries which were not required to fulfil the statutory duty of the Council offered to community organisations to run as community managed libraries. This would enable the provision of maximum local reach to library and other services for council customers whilst minimising the cost to the council where these were not part of the Councils core statutory duty.
- 4.2 In West Northamptonshire, 9 libraries were maintained as council run statutory libraries, 1 was maintained as a community managed statutory library and 8 libraries were proposed for transfer to become community managed libraries. As of April 1st, 2023, 6 of these libraries have successfully transferred and the remaining two (Abington and Kingsthorpe) will transfer once their leases have been finalised by the Council’s Estates team.
- 4.3 With the transformation programme coming to an end West Northants Libraries now require a new strategy to enable the service to now focus on its contribution and role in delivering against the West Northamptonshire corporate priorities and the 10 Integrated Care Northamptonshire Strategy “Live your best life” ambitions.
- 4.4 The Strategy sets out the 7 priority areas for our public libraries, what we will do to deliver against these and how we will measure success. These priorities are;
 - Increased reading and literacy
 - Cultural and creative enrichment
 - Improved digital access and literacy
 - Healthier and happier lives
 - Helping everyone achieve their full potential

- Greater prosperity
- Stronger and more resilient communities

4.5 Our new strategy will build on the previous work to make our libraries hubs for local communities from which a range of services, information and support can be accessed. It considers the post-pandemic landscape and the resulting behavioural changes of residents and needs of the communities, as well as the opportunities to utilise the new community managed libraries model to provide services locally.

5. Issues and Choices

5.1 The accompanying Library Service Strategy 2023-2027 has been designed to address the corporate priorities of West Northamptonshire Council. The 18 library venues are well located at the heart of local communities and provide vital local access to services and support for residents.

5.2 The strategy uses the 6 corporate priorities as a framework and demonstrates how the Library Service delivers against the priorities with particular emphasis on Improved Life Chances, Thriving Towns and Villages and Economic Growth.

5.3 Libraries' unique position of being neutral, safe, trusted, and non-judgemental spaces also enables them to support the Integrated Care Northamptonshire Strategy "Live your best life" ambitions. As community hubs of knowledge, information and resources libraries act as conduits and connectors, providing information and opportunities to improve wellbeing, and in particular mental health. This includes opportunities for self-help as well as community level social prescribing and the promotion of key Public Health messages and campaigns to a wide audience.

5.4 The statutory function of the library services is preserved and maintained through delivery of the Libraries Connected Public Library Universal Offers. These focus on Reading and literacy, Health and wellbeing, Culture and Creativity and Information and Digital.

6. Implications (including financial implications)

6.1 Resources and Financial

6.1.1 It is anticipated that the new strategy will be delivered within the current service budget envelope. However, the service will continue to exploit new and existing channels of income generation as part of the strategy and will make best use of S106 contributions to enhance the service locally. The strategy calls for the protection of the book and media fund at its current level alongside a commitment to invest in technology to ensure the service remains fit for the future.

There are no further additional resources or financial implications arising from the proposals.

6.2 Legal

6.2.1 The council has a statutory duty under the Public Libraries and Museums Act 1964 to provide a “comprehensive and efficient library service for all persons desiring to make use thereof.” The strategy has been reviewed by colleagues from the Department for Digital, Culture, Media, and Sport to ensure that the strategy is concurrent with the statutory duty. There are no specific legal implications arising from the proposals.

6.3 Risk

6.3.1 There are no significant risks arising from the proposed recommendations in this report. The risk of not adopting a new Library Service Strategy is that significant opportunities would be missed to further develop the community hub functions of both the council run and community managed libraries. These missed opportunities would be detrimental to local communities and the Local Area Partnerships as the strategy provides a framework for significantly increased community support through the library service.

6.4 Consultation and Communications

6.4.1 Following Cabinet approval of the draft, we will consult the public and stakeholders over an 8-week period on the draft strategy for the library service, prior to finalising the document for its future adoption. Following approval of the final strategy, the Council will undertake a range of communications activities to ensure residents and other stakeholders will be kept informed and engaged about the objectives, priorities and outcomes of the strategy.

6.5 Consideration by Overview and Scrutiny

6.5.1 The Strategy was considered by the Place Scrutiny Committee on Tuesday 18th April 2023. The committee approved of the proposed strategy and the key priorities. They asked for greater clarity around the importance of Libraries as hubs for other council and local services and clearer definition in the section on “How we will measure success”. As a result, changes were made to the text to make these areas clearer.

6.6 Climate Impact

6.6.1 The Strategy sets out the Library Service’s approach to climate responsibility and sustainability and a commitment to promoting this within communities. Libraries should play a key role in educating communities about climate and sustainability and provide opportunities to connect people enabling them to explore these issues locally.

6.7 Community Impact

6.7.1 The Strategy sets out the ways in which the service and the individual libraries will be tailored to meet the changing needs of the local communities they serve. This includes providing face to face support locally as well as a front door to West Northamptonshire Council.

7. Background Papers

7.1 NA



**West
Northamptonshire
Council**

Library Service Strategy

2023 - 2027



Foreword

In recent years West Northamptonshire Libraries have been through a period of significant transformation against a challenging background of the global Covid pandemic and local government reorganisation. Throughout this period we have been privileged to partner with the amazing local community groups and organisations who worked tirelessly to take over their local libraries. This enabled continued local access to library services and a range of other services. Thanks to their dedication there are 9 thriving community managed libraries in West Northamptonshire, enhancing those libraries that form part of the statutory provision, each offering consistent library services along with a range of tailored activities, events and support services to meet the needs of their local communities.

They did this because libraries change lives – they provide a valuable resource to the local communities they serve; they are unbiased, accessible, friendly, free and warm. They offer opportunities and support at every stage of life and are a trusted source of information, providing learning and skills, study spaces, essential digital resources, a place to meet and socialise and volunteering opportunities. Throughout their lives, people dip in and out of libraries particularly during times of significant change: unemployment, parenthood, bereavement. It is important therefore that modern libraries are:

- Welcoming and accessible
- Safe and inclusive
- Enabling
- Proactive and responsive

When the closure of libraries was enforced as part of the Covid measures in 2020, the library team used their skills to support the Covid response and helped to contact 40,000 vulnerable individuals whilst adapting the library service to deliver as much as possible within the confines of the Government restrictions.



Once these restrictions were finally lifted, Libraries re-opened and began the task of rebuilding public confidence delivering the highly valued services that our users need.

There are new challenges to meet with the rise in the cost of living and other global crises, and our libraries are seeking to meet these emerging needs; providing welcome and support groups for Ukrainian settlement, providing warm spaces for those who need them and partnering with banks and other organisations to ensure residents can access advice and support locally.

As West Northamptonshire moves forward with a new Integrated Care System, the function of our libraries as community hubs for local area partnership neighbourhoods is more important than ever. They are the eyes and ears at the heart of their communities, proactively identifying local challenges and opportunities and working with the right partners to meet the changing needs.

This strategy sets out how we propose to continue to develop our libraries as thriving community hubs over the next 4 years ensuring that we take advantage of every opportunity to help deliver on our council priorities and the 10 Integrated Care Northamptonshire Strategy Live Your Best Life ambitions.

Cllr Adam Brown

Deputy Leader of West Northamptonshire Council and Cabinet Member for Housing, Culture and Leisure

Our Strategy

This strategy will guide how we develop and deliver our statutory service over the next 4 years, shaping our services around local need and in alignment with the Libraries Connected Universal Library Offers, West Northamptonshire Council's Strategic Priorities and Integrated Care Northamptonshire Strategy: Live Your Best Life Ambitions.

West Northamptonshire Council priorities:

Green and Clean

Environment & Wellbeing

1

Improved Life Chances

Health, Social Care & Families

2

Connected Communities

Transport & Connectivity

3

Thriving Villages & Towns

Place Shaping & Homes

4

Economic Development

Growth & Prosperity

5

Robust Resource Management

Transparency & Financial Probity

6

As a Public Library Service, we aim to include a broad representation of opinion and as such do not censor or remove books. Our public libraries are committed to upholding the values of freedom of expression and debate as set out by the Chartered Institute for Library and Information Professionals. We therefore do not restrict access to information on any grounds, except that of the law and we do not censor material on moral, political, religious, racial or gender grounds.

The local authority has a statutory duty to provide a 'comprehensive and efficient' public library service and the Libraries Connected Universal Library Offers give guidance as to how to connect communities, improve wellbeing and promote equality through learning, literacy and cultural activity. We have aligned this strategy to the wider council priorities and the Integrated Care Northamptonshire Strategy 'Live Your Best Life' ambitions. We will be engaging local partners and volunteers to enable us to fulfil our objectives.

Our statutory library service is made up of 9 council run libraries, a 24/7 online library service, a school library service and a Library to You home library service which delivers to housebound customers. We also support 9 Community Managed Libraries who extend the library services outside of the statutory provision and we value our Community Managed Libraries as key stakeholders and community-based delivery partners.


Our Public Library priorities are:

- Increased reading and literacy
- Cultural and creative enrichment
- Improved digital access and literacy
- Healthier and happier lives
- Helping everyone achieve their full potential
- Greater prosperity
- Stronger, more resilient communities

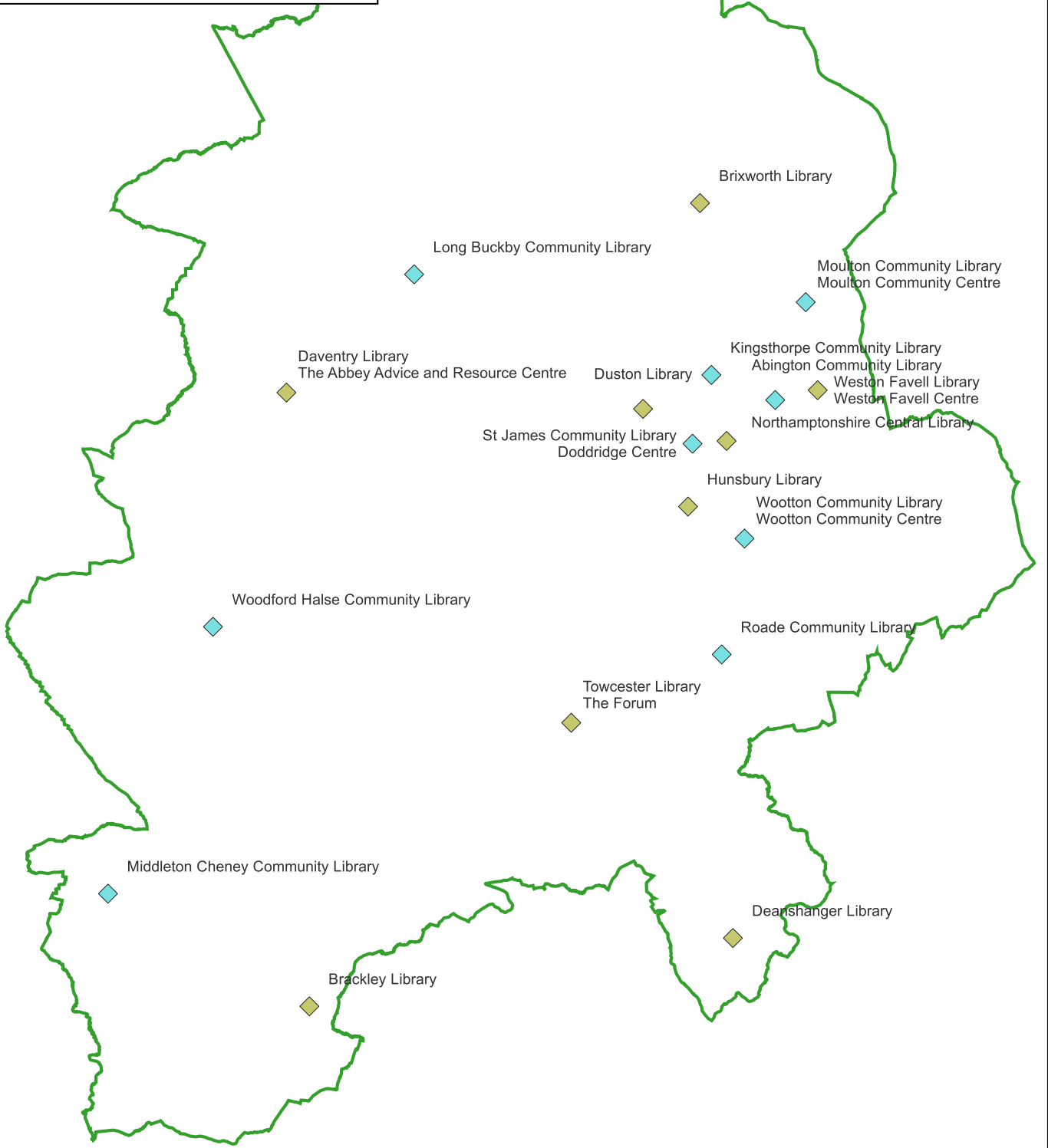
Legend

 West Northamptonshire boundary

Libraries West Northamptonshire

 Community

 WNC



West Northamptonshire Council

Title: **West Northamptonshire Libraries**

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What are we going to do?

We will provide a modern, sustainable, responsive library service in welcoming, inclusive spaces in local communities where people are treated with dignity and respect. This means we will:

Optimise the spending of the annual book and media fund

- Negotiating the best prices for books, e-lending, e-books and other resources
- Consortium purchasing, bulk buying and standing order plans for discount purposes
- Purchasing the best value items from the permitted sources
- Make best use of economies of scale
- Meeting the changing needs of modern readers by providing books in a range of formats

Provide up to date books, resources and technology to enable equal access to services for all by:

- Maintaining books and resources that are current and relevant in accordance with the Northamptonshire Libraries Stock Policy and national guidance
- Providing resources that cover a range of perspectives that encourage debate
- Regularly refreshing technology to be fit for the future
- Stocking items to meet community need

Support Community Managed Libraries to provide up to date, relevant resources and support in their communities by:

- Providing training and support
- Annually reviewing the Service Level Agreement
- Providing systems and resources
- Updating and renewing systems and resources
- Assisting with purchase of their books within their allocated funds
- Engaging and consulting around any proposed changes

Engage with local partners and volunteers to maximise our range of services making full use of the Local Area profiles to target events around local need

Making every contact count to improve health and wellbeing of individuals by:

- Engaging with customers and listening to their needs
- Signposting to services and support
- Obtaining impact stories to measure success
- Supporting Public Health campaigns

Support climate responsibility and sustainability by:

- Reducing our carbon footprint in our activities and physical resources
- Enabling communities, jointly with local partners to explore, develop, learn and decide about sustainability
- Increasing recycling in our buildings including supporting residents to recycle in our libraries

Seek to enhance our income opportunities to reduce the cost of the library service to the Council by:

- Accepting donations and selling redundant stock
- Hiring rooms and exhibition spaces
- Developing our retail offer
- Being entrepreneurial by maximising income generation opportunities such as parcel distribution centres
- Hosting traded services

How will we measure success?

We will seek customer feedback about the impact that the library service has made to them

Minimum 1% increase in use of library facilities year on year

- Visitors
- Borrowing
- Engagement at events

Minimum 1% increase in volunteers year on year

Vision and Values

West Northamptonshire Libraries will provide local access to resources and services to enable individuals to develop their skills and improve their wellbeing throughout their lives, leading to more resilient communities.

We draw from the Libraries Connected strategic vision. Our ethos and values entwine with the council values thoroughly for our customers, our partners and our colleagues.

Libraries are essential community hubs in West Northamptonshire that continue to thrive because of a strong customer ethos, a hard-working and dedicated workforce of staff and volunteers and a constantly moving offer which is relevant in the lives of local people.

We will provide an up to date, diverse and accessible library service for all to make use of.

Libraries in the local communities, where everyone is welcome – where you can go to study, to meet people and to become involved in your local community.

Libraries for life - residents are able to utilise services from cradle to grave, as places to learn and develop, enabling them to be healthy and happy.

Libraries where you can access information and support – in a variety of innovative and accessible ways.

Libraries that are diverse and inclusive – demonstrating a broad representation of opinion and without censoring material on moral, political, religious, racial or gender grounds.

THRIVE

Our Core Values

TRUST

We are honest, fair, transparent and accountable. We can be trusted to do what we say we will.



HIGH PERFORMANCE

We get the basics right and what we do, we do well. We manage our business efficiently.



RESPECT

We respect each other and our customers in a diverse, professional and supportive environment.



INNOVATE

We encourage curiosity, we are creative and seize opportunities to grow individually as an organisation and as an area.



VALUE

We continually strive for best practice and ways of improving existing procedures, practices and systems and thereby promoting efficiency and cost effectiveness



EMPOWER

We believe in people, will listen, learn and trust them to make decisions. We help people to realise their ambitions.



Priority 1 - Increased Reading and Literacy

Engage, Imagine, Discover

Research shows that those reading for pleasure are happier, healthier and more confident. Adult education in literacy is shown to reduce depression levels and children who read for pleasure have increased cognitive development.

Libraries give everyone free access to books and literature regardless of age, disability, wealth or education. Increasing literacy is vital for learning, employability and life opportunities.

Working with partners we will:

- Deliver a range of events and activities to support reading
 - Bookstart Bear club, Summer Reading Challenge
 - Adult reading initiatives
 - Quick reads
 - Library to You
 - Rhymetime / story-time
 - Book clubs
 - School Library Service
 - Story sacks
 - Other national and regional initiatives to promote reading for pleasure
- Increase opportunities for Reading Friends groups to further engage locally and with partners
- Provide advice and guidance to help people extend and develop their reading choices
- Provide an engaging and diverse book stock and reading material that is fully inclusive, upholding the values of freedom of expression and debate
- Work with volunteers and reader development organisations to support less confident readers and grow reading for pleasure activities

- Provide alternative access to library resources through Library to You and online library membership

What does success look like:

- Increased borrowing of both physical and digital literature
- Increased involvement in literature initiatives
- Topical subjects covered in a wide range of materials
- Up to date Wellbeing collections
- Protected book and media fund
- Impact stories are actively sought and recorded
- Systems are updated on a 5-year cycle enabling improved services

West Northamptonshire Council priorities:

- Improved life chances
- Robust resources management

Live Your Best Life ambitions:

- The best start in life
- Access to the best available education and learning

Priority 1 - Increased Reading and Literacy

Case study

Reading Friends connects people by starting conversations through reading, providing opportunities to meet others, share stories, make new friends, and have fun. It creates social connections and takes a person-centred approach, building on interests and hobbies to get people talking.

It is not a traditional reading group and people taking part in Reading Friends don't need to be 'readers' as reading is used as a conversation starter, to create connections and to help people get to know each other.

Reading Friends helps both participants and volunteers feel more connected to others (Reading Friends evaluation).

Age UK's research shows that maintaining meaningful engagement with the world around you is key to wellbeing. Taking part in activities that support wellbeing is most difficult for people who are lonely and isolated or in poor health.

“

we're so pleased we came to Reading Friends, it made us realise that just because we're in the place we are that we are still welcome in the library. You told us about the link to Universal Credit on your computers and we came in and used them, that helped us sort our Universal Credit. We had a look at the Strong Start website and think it's something we can do when the baby gets here, it's really good to find out about the free stuff out there and who can help us: it's all a little scary at the moment but you really helped us.

”

Priority 2 - Cultural and Creative Enrichment

Explore, Create, Participate

Culture and creativity enrich lives enhancing a sense of place, improving social opportunities and increasing wellbeing. Studies show that only 15% of the general population engage in cultural activity and they tend to be of the higher socioeconomic status.

Libraries are inclusive cultural hubs in communities used by all social groups. We will support an increase in cultural and creative activities and resources to enable and encourage all to explore, create and participate in learning, leisure, community and social activity.

Working with partners we will:

- Deliver a range of events and activities to support culture and creativity and enable peer support networks
 - Rhymetimes, knit and natter, craft groups
- Provide an engaging and diverse book stock reflecting culture and creativity that is fully inclusive
- Identify and maximise opportunities to enhance our cultural offer with a range of partners
- Provide space within libraries for cultural and creative groups to exhibit and meet which will encourage participation
- Work closely with Northampton Museum and other partners to bring cultural activity into libraries
- Pursue cultural funding opportunities from a range of sources e.g. Arts Council England

What does success look like:

- Increased engagement in cultural activities
- Increased delivery of cultural events and activities through partners
- Impact stories are sought and recorded

West Northamptonshire Council priorities:

- Improved life chances
- Thriving villages and towns

Live Your Best Life ambitions:

- Connected to their family and friends
- To be accepted and valued simply for who they are

Priority 3 - Improved Digital Access and Literacy

Inform, Inspire, Innovate

Digital skills give people the opportunity to live more independently, to access services more easily and more economically, to learn and interact with others. This increases employability and reduces social isolation.

Libraries provide a network of accessible locations with free Wi-Fi, charging, computers, printing, and tablets.

We will provide a safe and supportive environment enabling an increase in digital access, training and support to help people use online services confidently and safely. We seek to future proof citizens in a world that is rapidly becoming digital by default.

Working with partners we will:

- Provide resources and activities to develop the skills to become independent users of digital services
 - Coding clubs, digital skills
 - Digital champions
 - Learning and development activities
- Promote Online safety within our own equipment and provide access to resources for individuals to be safe online
- Support to access gov.uk and other online services
- Provide physical and virtual access to resources and activities
- Provide engaging and diverse e-lending services including e-books, e-audiobooks, e-magazines, e-newspapers, online subscriptions such as Go Citizen, Theory Test pro, Ancestry
- Provide access to the internet in a range of ways to enable use of information, services and support

- Provide up to date, relevant technology to provide an efficient and future proofed library service

What does success look like:

- Increased engagement at digital events
- Increased delivery of digital events and activities through partners
- Impact stories are sought and recorded, demonstrating increased digital confidence
- Systems are updated on a 5-year cycle
- Increased digital champion volunteers

West Northamptonshire Council priorities:

- Improved life chances

Live Your Best Life ambitions:

- Access to the best available education and learning
- To feel safe in their homes and when out and about
- Connected to their family and friends



After helping me print a document I was booked in with an IT buddy who supported me to use my laptop. I never realised this sort of help was available in the library, I am very grateful.



Priority 4 - Healthier and Happier Lives

Healthier, Happier, Connected

Libraries deliver significant economic benefits on preventative spend and return on investment. The health and wellbeing offer from libraries is estimated to bring a cost saving to NHS England of £27.5m each year (source Arts Council 2015 Health and wellbeing benefits of public libraries.) Research suggests significant associations between frequent library use and reported wellbeing and improved access to health information through libraries and reduced calls on services such as GP's.

Libraries offer a wide range of information around more common health conditions as well as activities and resources to improve mental health.

We will offer non-clinical spaces for health and wellbeing groups and provide resources to promote self-care and self-management of long-term conditions to boost health literacy. This enables an understanding of how to find and use information to improve own health and wellbeing, closing health inequality gaps.

Working with partners we will:

- Provide free, warm, accessible, welcoming places
- Provide quality assured health literacy resources and information
- Provide volunteering opportunities to reduce isolation and improve future life choices
- Provide opportunities and activities to connect with the wider community to reduce social isolation
- Upskill staff to enable them to have healthy conversations - Make Every Contact Count (MECC)

What does success look like:

- Up to date reading well collections
- Increase in reading well collection loans
- Impact stories are sought and recorded

West Northamptonshire Council priorities:

- Improved life chances
- Robust resource management

Live Your Best Life ambitions:

- Opportunity to be fit, well and independent
- To be accepted and valued simply for who they are



Just to say, I popped in and borrowed the epilepsy books this morning. What a great selection. I'm very pleased and impressed. Thank you so much for your efforts in this regard. I'm most grateful



Priority 5 - Helping Everyone Achieve Their Full Potential

Aspirations, Transitions, Lifelong Learning

Libraries provide support during key life transitions and help people to access services to resettle, reset or improve their life. They raise people's aspirations and promote lifelong learning through the offer of free resources for developing and studying: From the provision of parent/carer collections and rhymetimes for babies to development of the skills to handle and interpret information confidently and safely throughout a lifetime.

We will provide warm welcoming spaces with opportunities to study, develop, volunteer and socialise.

Working with partners we will:

- Provide alternative spaces for study where people cannot study at home
- Provide Study Happy spaces and resources
- Provide volunteering opportunities to enable people to develop life and work skills
- Deliver a range of events and activities to support lifelong learning
 - Rhymetimes
 - Homework clubs
 - Language café's
 - Digital (online) skills
 - Maths/English/English for Speakers of Other Languages (ESOL)
 - BIPC courses and workshops

- Provide parent /carer collections
- Provide physical and online resources for self-led studying and learning
 - Books and audio books
 - E-books and e-audio books
 - Go Citizen
 - Theory test pro

What does success look like:

- Increased engagement at learning events
- Increased delivery of wellbeing events and activities through partners
- Increased borrowing
- Impact stories are sought and recorded
- Volunteers gaining employment

West Northamptonshire Council priorities:

- Improved life chances

Live Your Best Life ambitions:

- The best start in life
- Access to the best available education and learning
- Employment that keeps them and their families out of poverty
- The chance for a fresh start when things go wrong



Thank you for your help using Excel in the past, I have passed my exams with marks of 75% and 95% and thank you for providing me with a study space, I would not have been able to study at home and appreciate being able to use the library //

Priority 6 - Greater Prosperity

Employability, Economic Growth, Financial Security

Libraries contribute to improving the prosperity of local communities by increasing employability, supporting small businesses to flourish and helping to keep families out of poverty.

We will work alongside local partners to expand our support for job seekers and provide good quality information and resources on debt and money management to enable people to take up benefits and support they are entitled to.

Through the Business and Intellectual Property Centres (BIPCs) we will enhance our provision for aspiring entrepreneurs and small medium enterprise (SMEs).

BIPCs provide excellent value for money and return on investment - £6.95 is generated for every £1 of public funding.

Working with partners we will:

- Deliver and develop our award-winning BIPC
 - Provide advice and support to help start up, protect and grow business through one-to-one advice, workshops and webinars
 - Provide free access to business research databases and Intellectual Property advice
 - Seek external funding to deliver grants for small businesses
- Support the West Northamptonshire Council Anti-poverty Strategy

- Provide physical and virtual resources to enhance money management skills, employability and small business success
- Deliver a range of events and activities to support job seeking and business improvement
 - Job clubs
 - Networking events
- Provide volunteering, apprenticeship and work experience opportunities to enable people to develop work skills
- Provide learning opportunities which support people with work and life skills
- Provide access to the internet to enable people to acquire information and conduct research

What does success look like:

- Increased number of small and medium businesses launched
- Increased engagement at events
- Increased delivery of events and activities through partners
- Impact stories are sought and recorded
- Additional specialist support leveraged from partners by the BIPC

West Northamptonshire Council priorities:

- Improved life chances
- Thriving towns and villages
- Economic growth

Live Your Best Life ambitions:

- Employment that keeps them and their families out of poverty

Priority 6 - Greater Prosperity

Case Study

The Business & Intellectual Property Centre (BIPC) Northamptonshire is part of the British Library led network of BIPCs. They support entrepreneurs and innovators from that first spark of inspiration to successfully launching and growing a business.

The programme of support includes workshops, webinars and 1:1 advice sessions covering everything from the basics designed to equip attendees with the skills needed to start and run a successful business, to business growth, social media, website, Search Engine Optimisation (SEO), intellectual property and more. They also offer free access to business subscription resources which are invaluable for business planning and intelligence.

BIPC Northamptonshire is comprised of a Regional Centre at Northampton Central Library and four BIPC Locals – two in North Northamptonshire at Kettering and Wellingborough Libraries and two in West Northamptonshire at Brixworth and Towcester Libraries. All other council run libraries act as a signposting service.

Libraries in Northamptonshire have been delivering business support since 2012 and have been part of the National Network of BIPCs since 2015. They are ideally situated within communities to provide trusted and impartial advice and have a proven track record of supporting local economies.

In 2019 an independent economic evaluation showed that businesses which start with the support of a BIPC show strong survival rates – an average of 9 in 10 are still trading after 3 years, compared to 6 in every 10 for the general business population. BIPCs also provide excellent value for money and return on investment - £6.95 is generated for every £1 of public funding.

Feedback from BIPC Northamptonshire users

"Good informative advice session, given me confidence to progress further with my business idea."

"...Excellent training, really informative and I come away enthusiastic and with a 'to do' list full of suggestions from the session. Thank you, what an invaluable resource, so glad I have found you!"

"Very insightful, speaker was engaging, knowledgeable and easy to listen to. Probably one of the most helpful social media marketing webinars I have attended. The slides were also useful, clear and concise! Thank you very much!"

Priority 7 - Stronger, More Resilient Communities

Sense of Place, Celebrating Diversity, Social Cohesion and Mobility

Libraries are accessible, inclusive spaces, open to everyone, for the community to share. Library staff understand communities needs and are trusted to provide reliable guidance and to support a range of issues when needed. 'People who are more socially connected to family, friends or their community are happier and live longer, healthier lives with fewer physical and mental health problems than people who are less well connected.' The Mental Health Foundation (2016)

We will offer a modern, sustainable, responsive library service in welcoming inclusive spaces where people are treated with dignity and respect. Located in the heart of Local Area Partnership neighbourhoods, we will provide community hubs that seek to understand the needs of local communities enabling the right services and partners to collocate and deliver their services from the library.

Working with partners we will:

- Provide free warm, accessible, baby friendly, welcoming places
- Provide spaces where vulnerable residents can 'Keep safe'
- Provide information and resources to explore the local area and its history
- Host a range of diverse local events
- Provide rooms for hire
- Provide a front door to council and partner services including consultation and engagement activities and blue badge and bus pass applications
- Support refugee resettlement programmes, welcoming refugees and providing relevant resources in their language

- Deliver outreach activities and events outside of our buildings taking the library to new places to engage with new customers who do not currently use the library, to include underrepresented groups and protected groups under the Equalities Act
- Consider autism and dementia friendly spaces, adapt libraries where practical and build into future library redesigns
- Provide access to assisted technology to enable those with additional needs to access library service
- Provide volunteer opportunities for people to be involved in and give back to their communities

What does success look like:

- Increased partnership working to meet local needs
- Increased visitors
- Increased volunteers
- Impact stories are sought and recorded

West Northamptonshire Council priorities:

- Thriving towns and villages

Live Your Best Life ambitions:

- A chance for a fresh start when things go wrong
- To feel safe in their homes and when out and about
- To be accepted and valued simply for who they are



It is really good that you are providing tea and coffee for the winter warmth, I suffer with mental health issues and it's great that I can come in each day and talk to the staff and have a cup of tea. Thank you, it's really important for me.

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WEST NORTHAMPTONSHIRE COUNCIL CABINET

Tuesday 11th July 2023

**Cabinet Member for Housing, Culture and Leisure:
Councillor Adam Brown**

Report Title	Draft West Northamptonshire Housing Allocation Scheme
Report Author	Jacqueline Brooks – Housing Services Manager jacqueline.brooks@westnorthants.gov.uk

Contributors/Checkers/Approvers

Monitoring Officer	Catherine Whitehead	21/06/2023
Chief Finance Officer	Martin Henry	21/06/2023
Head of Communications	Becky Hutson	21/06/2023

List of Appendices

Appendix A – Draft West Northamptonshire Housing Allocation Scheme

1. Purpose of Report

- 1.1. To seek Cabinet approval that the draft West Northamptonshire Housing Allocation Scheme is subject to a ten-week public and stakeholder consultation.

2. Executive Summary

- 2.1 It is a legal requirement under Part 6 of the Housing Act 1996 (as amended) that Local Authorities have a housing allocation scheme, that sets out who is eligible to apply for social rented housing, how the local authority will prioritise applicant's and the basis on which a Local Authority will allocate accommodation.

- 2.2 In accordance with the Local Government (Structural Changes) Transitional Arrangements) (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation) West Northamptonshire Council requires a new Council Housing Allocations Scheme by 1 April 2024.
- 2.3 The draft West Northamptonshire Housing Allocation Scheme has been developed to provide an aligned and harmonised approach across West Northants. This will help in meeting the housing needs of the most vulnerable of West Northamptonshire’s residents whilst ensuring that the area’s valuable housing resources go to those in most in need.
- 2.4 The proposed Scheme will be through a choice-based lettings operating system.

3. Recommendations

- 3.1 It is recommended that Cabinet:
- a) Approve a ten-week public consultation period on the draft West Northamptonshire Housing Allocation Scheme
 - b) Approve delegated authority to Portfolio Holder for any changes to the Scheme prior to the start of the consultation
 - c) Note that following the public and stakeholder consultation, a final West Northamptonshire Housing Allocation Scheme will be brought back to Cabinet for adoption.

4. Reason for Recommendations

- 4.1 To accord with legislation which requires that when a local authority makes an alteration to their Housing Allocation Scheme reflecting a major change, they shall within a reasonable period of time bring these changes to the attention of those likely to be affected by them.

5. Report Background

- 5.1 West Northamptonshire Council is required to produce a new Housing Allocation Scheme in accordance with the Local Government (Structural Changes) Transitional Arrangements) (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation) which sets out that a Housing Allocation Scheme needs to be prepared with 36 months of a transition into a unitary authority.
- 5.2 It is a legal requirement under Part 6 of the Housing Act 1996 (as amended) that Local Authorities have a Housing Allocation Scheme, that sets out who is eligible to apply for social rented housing,

how the local authority will prioritise applicant and the basis on which a Local Authority will allocate accommodation.

- 5.3 The Council currently operates three different housing allocation schemes across West Northamptonshire, these were inherited from legacy authorities and operate in the same local areas as prior to 1 April 2021. The Daventry and Northampton areas operate choice-based lettings, whereas the South Northants area operates a direct lettings scheme.
- 5.4 The current schemes have different qualification criteria and how applicants housing needs are assessed and then prioritised, although they all broadly follow the principle of prioritising households in greatest housing need.
- 5.5 The new proposed Scheme has been developed which aligns and harmonises a consistent approach for West Northamptonshire. The Scheme also provides the opportunity for applicants to consider housing solutions across the wider geographical areas in order to meet their needs.
- 5.6 In developing the new scheme, national evidence and examples of best practice in housing allocations were considered. In addition, the Scheme reflects updates in new legislation and guidance, including, to improve access to social housing for members of the Armed Forces, Veterans and their families, and the Scheme is fully compliant with the housing requirements of the Domestic Abuse Bill 2020.
- 5.7 The Scheme has been developed with regards to the Council's Corporate Plan 2021-2025 priorities and associated actions within improved life chances and thriving villages and towns. In addition, it is mindful of the Integrated Care Strategy and the 10 'live your best life' ambitions.
- 5.8 The proposed Scheme seeks to provide access to social rented housing for our most vulnerable residents, including those experiencing homelessness, those with complex health and welfare needs, victims of domestic abuse and those subject to exploitation. The proposed Scheme also recognises the Local Authority's corporate parenting role, through the allocation of housing for young people leaving care and are ready for independent living.
- 5.9 Proposed draft Scheme
- 5.10 The draft West Northants Housing Allocation Scheme sets out the proposed rules regarding:
 - a) Who is eligible for social rented housing
 - b) Who would not qualify for social rented housing in West Northamptonshire
 - c) How applications will be assessed and the priority that will be accorded depending on the level of housing need
 - d) How West Northants Council will allocate social rented housing.

5.11 Eligibility and Qualification

5.12 To join the West Northants Housing Allocation Scheme, an applicant will need to be both eligible and qualify.

- Eligibility

5.13 Social rented housing can only be allocated to people who have a permanent right to reside in the UK. Eligible applicants are defined by immigration legislation. If an Applicant is not eligible, then their application to join the West Northants Housing Allocation Scheme, does not progress any further.

- Qualification

5.14 Local Authorities are able to set their own local non-discriminatory qualification criteria. The draft scheme sets out persons who are non-qualifying and will not be allowed to join the Scheme.

5.15 It is proposed that the following circumstances of applicants will not qualify for the Housing Allocation Scheme:

a) Persons under 18 years of age

An applicant defined as a child (anyone age 0-17 inclusive). Exemptions will apply to a child who is aged 16 or 17 where a suitable third party can act as a trustee and hold a legal tenancy until the child reaches the age of 18 years.

b) Persons incapable of holding a tenancy

An applicant lacking the mental capacity to hold a tenancy as defined in the Mental Capacity Act 2005

c) Persons that do not meet the West Northants local connection criteria

Applicants need to have a local connection to West Northants for 2 years (based on either residency, employment, family associations, other special reasons, care leavers).

Exemptions will apply in the following cases:

- where the local authority has accepted a full statutory homelessness duty
- an applicant who are victims of domestic abuses
- an applicant who are members of the armed forces community

d) Persons found guilty of unacceptable or unreasonable behaviour

An applicant that is guilty of unacceptable behaviour that makes them unsuitable to be a tenant. There are a number of behaviours set out in paragraph 5.4.3 of the draft Scheme

e) Persons who have housing related debt

Applicants who have outstanding liabilities such as rent or service charge arrears or re-charges, above the equivalent value of one-twelfth of the annual amount payable. There is an emphasis within the Scheme on the willingness and evidence of regular affordable payments of the applicant to address the debt, whilst ensuring the affordability of the applicant.

f) Persons who have breached tenancy conditions

Applicants who have been evicted for any breach of tenancy conditions. There are a number of behaviours set out in paragraph 5.6.1 of the draft Scheme.

g) Persons who are homeowners in the UK or abroad

It is proposed that applicants who are homeowners will be disqualified. There are a number of exemptions that will apply, these are set out in paragraph 5.7.4 of the draft Scheme.

h) Persons who have an income and savings above the financial resource limit

An Applicant who has a gross household income of £60k or above will not qualify. This figure will be kept under review and on the circumstances of an applicant.

An Applicant with savings above £16,000 will be disqualified from the Scheme. The sum of £16,000 has been adopted as it accords with the rate at which the Department of Work and Pensions (DWP) sets its own criteria regarding entitlement to welfare benefits. This savings threshold will change in line with the DWP benefit and pension rates.

i) Persons who do not have a recognised housing need

An Applicant who does not fall within one of the priority bands will be assessed as having no housing need will not qualify on this scheme. This is to ensure that through the Scheme we make best use of the finite resource of social rented housing and ensure that Applicants that join the Scheme have realistic opportunities of being re-housed.

An exemption will apply if the Applicant has no housing need but establishes a local connection within a local lettings policy in relation to rural exception sites, and the local connection determined within the relevant legal agreements.

5.16 Prioritisation

5.17 The Council is required by law to determine the relative priority that housing Applicants are awarded.

5.18 The Housing Act 1996 sets out that some people due to specified circumstances or characteristics are given a priority for an allocation of social rented housing, also known as a reasonable preference:

- a) People who are homeless within the meaning of Part 7 of the 1996 Act
- b) People who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under s.192(3)
- c) People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- d) People who need to move on medical or welfare grounds, including grounds relating to a disability
- e) People who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others).

5.19 Applicants will be prioritised for an allocation of social rented housing according to the following criteria:

- Bands, in the order of A to D. Band A has the highest priority and Band D the lowest.
- Where two or more applicants might have the same priority in the same Band, then the effective date will be used to prioritise between Applicants.
- The effective date will be the date that the Local Authority receives the last piece of supporting information to enable the completion of housing assessment and accepted onto the Scheme.

5.20 Band A

Applicants awarded a Band A include those who have urgent medical need and those that need to move due serious risk of harm. In addition to support the need to make best use of housing stock, Band A priority will also be awarded to those applicants who are over-occupying their homes by one or more bedroom, and those releasing adapted properties that are no longer required by the applicant or a member of their household.

5.21 Band B

Applicants awarded a Band B include those are entitled to a reasonable preference. In particular those who are owed a homeless prevention, relief or main duty, need to move due to insanitary or overcrowded conditions. This band recognises the Council's corporate parenting responsibility, hence, includes care leavers who are ready to move into more independent living, and also household approved by the local authority as foster carers and require a larger property in order to look after a child under the care of the local authority. In addition, armed forces personnel are included in this band to reflect the statutory guidance to improve access to social housing. This priority band also includes those with high medical and / or welfare needs, and hardship grounds

5.22 Band C

Applicants awarded Band C represent those with lower-level housing needs and includes applicants with medium welfare needs. It includes homeless households who are in priority need but are intentionally homeless. In addition, those households who are overcrowded due to lacking one bedroom, Applicants who have at least one dependent child and are sharing facilities with others and split households.

5.23 Band D

This band includes a limited number of Applicants, including those who have refused the maximum number of offers of accommodation (for the majority of Applicants this will be 2) and are demoted to this band for 12 months. It will also include households who have been deemed to have deliberately worsened their circumstances. This band will also include specific households who are permitted to qualify for the Scheme with no housing need but have a local connection to a rural exception site, where allocation requirements are contained within legal planning agreements.

5.24 **Wider strategic priorities**

5.25 The priority banding also considers the wider strategic objectives of West Northamptonshire and its partners considering the role of housing in meeting health and social care outcomes. Examples of this are to those requiring suitable accommodation to facilitate hospital discharge (Band A), those ready to move on from supported housing or Local Authority care (Band), and those applicants who are victims of domestic abuse, racial abuse and hate crimes (Band A and B). The proposed policy approach also awards priority to those Applicants who are considered to be socially isolated and are unable to access services that are required (Band C).

5.26 **Choice based lettings**

5.27 The draft Scheme is proposing to operate a choice-based lettings (CBL) scheme. Operating an CBL Housing Allocation Scheme is regarded as best practice, as it promotes greater customer choice as it enables applicants to bid for a property to be re-housed. This approach can support people to move to locations they may not have previously considered, once they can access information about property types and demand in different areas.

5.28 The draft Scheme is proposing that properties to be re-let will be advertised on a weekly basis. Adverts will be created for each of the properties which will give details of the available properties and any specific criteria or restriction on who can bid. An Applicant will be able to make 3 bids during each bidding cycle.

5.29 **Offers of suitable accommodation**

5.30 It is proposed that Applicants will be entitled to two refusals of a reasonable offers of accommodation. However, the following exceptions are recommended:

- a) Homeless applicants to whom the authority has accepted a S193 main duty to accommodate will only receive only refusal of a reasonable offer of accommodation. After the first refusal, the 2nd nomination/offer will be through a direct match/auto-bid.
- b) Homeless applicants to whom the authority has accepted a S188 duty to accommodate will only receive only refusal of a reasonable offer of accommodation. After the first refusal, the 2nd nomination/offer will be through a direct match/auto-bid.
- c) Applicants who are subject to MAPPA are entitled to one reasonable offer to accommodation, this will be through a direct matching.

5.31 This will enable their high urgent housing needs to be resolved at the earliest opportunity, and timely move-on from temporary accommodation into permanent accommodation. Safeguards will be in place to ensure that any offers of accommodation are suitable in line with statutory suitability regulations.

5.32 Impacts of the new draft Scheme

5.33 The new draft Scheme has been developed to ensure that it is legally compliant and where required will align and harmonise the operation of the Scheme across West Northants. Criteria within the draft Scheme has been set against national sets of formula, for example savings thresholds linked to DWP Benefit and Pension rates, this makes the Scheme more robust and at less risk of challenge.

5.34 The current three existing Schemes in operation have collectively approx. 4000 households registered for re-housing. The draft West Northamptonshire Housing Allocation Scheme has the potential impact on applicants who will have access to a greater number of properties across West Northants under the draft new Scheme.

5.35 The existing schemes apply different thresholds for their qualification criteria, and the new Scheme will provide a consistent approach across West Northants, especially in the following areas:

5.36 Table 1: Summary of qualification criteria changes

		Existing Allocation Schemes			Proposed new scheme
Aspects of scheme	of	Daventry area	Northampton area	South Northants area	Draft Scheme WNC

Local connection	Residency last 12 months	Residency last 3 years	Residency 6 out of the last 12 months	2 years immediately prior to application
Housing related debt	Will not qualify with housing debt over £1000	Reduced priority for rent arrears	Will not qualify with over 8 weeks' worth of housing related debt	Will not qualify if rent exceeds 1/12 of the annual repayment amount and have failed to three monthly or 12 weekly consecutive payments
Property ownership	Do not qualify however exceptions in place	Combines assets and savings to for exclusion where there is no reasonable preference	Do not qualify – however exemptions in place	Do not qualify, however exceptions in place
Income threshold	Capped at £60k	Capped at: £30k single £40k joint	Capped at £60k	Capped at £60k
Savings threshold	No threshold	Capped at £16k for single applicant and £32k for joint	Capped at £16k	Capped at £16k
No housing need	Band D	Do not qualify	Do not qualify – exemption for rural schemes	Do not qualify – exemption for rural schemes

5.37 The proposed prioritisation banding system (A-D) is much simpler than some of the existing schemes, without the inclusion of points or stars etc.

5.38 A comparison exercise of the various aspects of the existing allocation schemes banding criteria shows that the new proposed scheme is broadly similar, and it is unlikely to be a significant impact on any one group of applicants in relation to losing or gaining relative priority for an allocation of housing. This is largely because the draft Scheme is framed on reasonable preference categories which existing schemes also reflect.

- 5.39 The new proposed Scheme is much clearer on how medical and welfare needs will be considered and prioritised with the Scheme, and the information that will need to be provided by recognised medical professionals.
- 5.40 A particular impact on current applicants to the legacy Daventry Allocation Scheme is those with no housing need seeking social rented accommodation. Under the proposed new draft Scheme, households with no housing need will not qualify for the scheme. In practice, this is likely to have a limited impact, as the demand on the current legacy scheme is approx. 135 applicants.
- 5.41 Alongside the work to develop a new draft housing allocation scheme for West Northamptonshire; are three related projects:
- a) The housing allocation Scheme ICT system
 - b) The housing allocation function and where it sits
 - c) The implementation of a new housing allocation Scheme and the alignment of processes and procedures.

6. Issues and Choices

- 6.1 It is a legal requirement under Part 6 of the Housing Act 1996 (as amended) that Local Authorities have a Housing Allocation Scheme
- 6.2 West Northamptonshire Council is required to have a harmonised housing allocation scheme by 1 April 2024 as set in the Local Government (Structural Changes) Transitional Arrangements (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation).
- 6.3 Therefore, to enable us to adhere to these timescales it is recommended that the draft West Northants Housing Allocation Scheme is approved for public and stakeholder consultation.
- 6.4 The Council may be at risk of legal challenge if we do not have an adopted Housing Allocation Scheme within the timescales set out.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.2 The draft Housing Allocation Scheme proposed does have costs associated with the accompanying ICT system. The proposed ICT solution and confirmation of the supplier will be subject to a procurement process. Work is currently taking place to identify what the ICT costs will be, and if these were to exceed existing budgets, a further report to Cabinet would follow.

7.2 Legal

- 7.2.1 It is legal requirement under Part 6 of the Housing Act 1996 (as amended) that Local Authorities have a Housing Allocation Scheme, that sets out who is eligible to apply for social rented housing,

how the local authority will prioritise Applicants and the basis on which a Local Authority will allocate accommodation.

7.2.2 In accordance with the Local Government (Structural Changes) Transitional Arrangements (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation) West Northamptonshire Council requires a new Council Housing Allocations Scheme by 1 April 2024.

7.2.3 Section 166A (13) states that:

Before adopting an allocation scheme, or making an alteration to their scheme reflecting a major change of policy, a local housing authority in England must:

- a) send a copy of the draft scheme, or proposed alteration, to every private registered provider of social housing and registered social landlord with which they have nomination arrangements and;*
- b) afford those persons a reasonable opportunity to comment on the proposals.*

7.2.4 The proposed consultation will satisfy this requirement.

7.2.5 Section 168(3) of the Housing Act 1996 as amended states: When the authority make an alteration to their scheme reflecting a major change of policy, they shall within a reasonable period of time take such steps as they consider reasonable to bring the effect of the alteration to the attention of those likely to be affected by it.

7.2.6 The consultation is proposing to contact all existing housing applicants and notify them of the draft changes which will satisfy this legal requirement.

7.2.7 A review of the draft West Northants Housing Allocation Scheme is being sought from Counsel to ensure the Scheme's lawfulness.

7.3 **Risk**

7.3.1 There is a legal requirement to consult on the proposed draft Housing Allocation scheme therefore failure to do so will leave West Northants open to challenge on the Scheme that is implemented.

7.4 **Consultation and Communication**

Subject to Cabinet approval, the draft Scheme will undergo a ten-week public and stakeholder consultation to seek input and feedback that will be used to shape and inform the final Scheme. This will then be submitted to Cabinet for final approval and adoption. Moving forward, the Council will undertake a range of communications activities to ensure stakeholders will be kept informed and engaged on the development and changes to the Scheme.

7.5 Consideration by Overview and Scrutiny

7.5.1 A presentation to Children's, Education and Housing Overview and Scrutiny took place on the 19th June 2023. Recommendations have been made to Cabinet and are set out in a separate report, however the completeness the recommendations and an officer response are set out below:

1. The proposed non-qualifying criteria for the Housing Allocation Scheme should not bar persons who have housing related debt but who are making reasonable efforts to pay it back.

Response: The draft Scheme has a person-centred approach to housing related debt, focusing on debt that is above the equivalent value of one twelfth of the annual amount payable by an Applicant. The emphasis within the Scheme is the Applicants willingness to address the housing related debt and proposes that the applicant is required to have a repayment plan and requires no less than three monthly or 12 weekly continuous payments.

Any repayment agreement will be based on the affordability of the applicant, rather than the level of debt. Efforts will be made to take into consideration why the housing related debt had arisen in the first place.

2. The proposed non-qualifying criteria for the Housing Allocation Scheme should deal robustly with persons who have damaged social rented housing let to them in the past.

Response: The draft Scheme is robust in its approach to applicants who have been in breach of a tenancy (regardless of tenure) within the previous six years. This is set out in section 5.6.1.

3. An applicant who has at least one dependent child and is living in accommodation where the facilities are shared with others outside their own household should be placed in Band B not Band C of the proposed bands for assessing housing need.

Response: The current draft Scheme has 'An applicant who has at least one dependent child and is living in accommodation where the facilities are shared with others' this category of need is within Band C. However the current draft does not a distinction between sharing facilities with family associations and those sharing facilities with households outside of their family associations. The Scheme could separate these housing need categories out to reflect the following:

Band B: An Applicant has at least one dependent child and is living in accommodation where the facilities are shared with others who are not part of your family association

Band C: An Applicant has at least one dependent child and is living in accommodation where the facilities are shared with a family association.

*Family Association are defined within the local connection criteria, section 5.3.2 (C)
Sharing facilities are defined as sharing a bedroom, kitchen and main front door*

4. The proposed bands for assessing housing need should include provision for an applicant who has a dependent child under 16 years old who is subject to a Child Protection Plan.

Response: The draft Scheme includes the use of discretionary powers in relation to qualification, choice and prioritisation in a limited individual case, where an applicant needs to move due to:

- a) Multi-Agency Risk Assessment Conference (MARAC).
- b) Multi-Agency Public Protection Arrangements (MAPPA).
- c) Action being taken as a result of adult or child safeguarding concerns.

A decision as to whether or not to exercise discretion will be made at the point of receipt of application and again at the point of offer.

5. Clear information regarding the affordability of properties should be made available to applicants at an early stage in the bidding process, ideally including an affordability calculator tool.

Response: The current draft Scheme includes within the appendices, an affordability assessment checklist, which sets out how to determine whether an Applicant can afford the housings costs of the property they have been allocated.

When implementing the ICT to support the operation of the Scheme, work will take place on developing a self-service affordability calculator that Applicants can also use. Work will also take place with Registered Providers across West Northamptonshire develop a standard approach to assessing affordability.

6. The go-live date for the new Housing Allocation Scheme should be scheduled for after 1 April 2024 to mitigate risks that could result from coinciding with the date when Council Tax bills are issued.

7.6 Climate Impact

7.6.1 None

7.7 Community Impact

7.7.1 An Equality Screening Assessment in respect of the draft Housing Allocations Scheme has been completed and will be made available alongside the formal public and stakeholder consultation. Changes will be made to the ESA to reflect any feedback gathered during the consultation.

8. Background Papers

none

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West Northamptonshire Council Housing Allocation Scheme

June 2023

DRAFT

Contents

1. Introduction	3
2. Aims of the Scheme	5
3. Scheme outline	5
4. Eligibility	9
5. Qualification	14
6. Registration	24
7. Assessment of an application	27
8. Prioritisation of applications	42
9. Making an Allocation	51
10. Applicants Right to Review	64
11. Information about the Scheme	66

Appendix A: Legal Framework

Appendix B: Registered Providers which own stock in the LA area

Appendix C: Participating Registered Providers

Appendix D: Cases where provisions about allocations do not apply

Appendix E: Determining an Applicants' ability to afford an allocation of social rented housing

Appendix F: Determining an applicants' entitlement to bedrooms, for Assessing overcrowding, under-occupancy and for an allocation of accommodation

Appendix G: Annual report

Appendix H: Glossary

1.0 Introduction

- 1.1.1 The West Northants Housing Allocation Scheme describes how social rented housing is available through our Choice Based Lettings Scheme. It explains how the scheme operates, its processes and how people can apply for social rented housing, to West Northamptonshire Council (the “**Local Authority**”). Throughout this Scheme a reference to the ‘Local Authority’ means West Northants Council.
- 1.1.2 This scheme replaces the three separate Allocations schemes in place for the legacy Local Authorities of Daventry, Northampton and South Northants.
- 1.1.3 All Applicants who are on the Local Authority’s previous Schemes, will have to reapply to join this Scheme.
- 1.1.4 The Scheme sets out:
- a) who can apply and the eligibility and qualification criteria to join the Scheme
 - b) the extent of choice offered to Applicants when an allocation is being made
 - c) Applicants that are entitled to an additional or reasonable preference for an allocation
 - d) how priority between Applicants will be determined when an allocation is being made
 - e) the arrangements for allocating Council homes
 - f) the arrangements for allocating homes owned by the Local Authority that are managed on its behalf by Northamptonshire Partnership Homes (“**NPH**”).
 - g) the arrangements for allocating homes owned by registered providers of social housing (“**Registered Providers**”), who own and/or manage social rented housing in the Local Authority area.
- 1.1.5 The Local Authority will allocate social rented housing to:
- a) persons (“**Applicants**”) applying to become a social housing tenant, for both general needs and supported housing (including housing for older persons), let at affordable rent and social rent rates.
 - b) secure/assured tenants, with a housing need seeking to move to another dwelling house (“**Transfer Applicants**”), let under secure/assured tenancies.

1.2 Registered Providers

- 1.2.1 There are a number of Registered Providers (Housing Associations) across West Northamptonshire who own and manage social rented housing. A list of these Registered Providers (RPs) can be found at Appendix B. Those RPs participating in this Scheme can be found at Appendix C.

- 1.2.3 People who make an application to the Local Authority for an allocation of social rented housing, are also entitled to make separate additional applications for housing directly to any Registered Provider, where their own housing allocation rules and policies allow this.

1.3 Allocation of social rented housing

- 1.3.1 An “**allocation**” is defined as occurring when the Local Authority select an Applicant to be a secure or introductory tenant of social rented housing held by the Local Authority, or nominates a person to be an assured tenant (encompassing flexible and affordable tenancies) of social rented housing held by a Registered Provider, subject to certain exceptions.
- 1.3.2 The Local Authority will accept applications from its current tenants, for transfers (“**Transfer Applicants**”) to alternative social rented housing available in the Local Authority area. Such Applicants have the right to:
- a) Make applications.
 - b) Have their applications considered.
 - c) Be notified as to their rights to information and review.
 - d) Confidentiality of the fact of their application.
- 1.3.3 The Local Authority will initially treat Transfer Applicants in the same way as all other Applicants, except that there will be no inquiries made about eligibility. Transfer Applicants will be prioritised in the same way as new Applicants (e.g. by housing need and then date of applying to join the scheme).
- 1.3.4 Transfer Applicants will be made an offer that ensures they do not inadvertently lose accrued rights and will be an equivalent tenancy to that which they are transferring from. Arrears of rent outstanding on a previous tenancy can be transferred to the new one when both properties are held by the Local Authority, subject to agreement as to how those arrears will be cleared (compliance with the arrears agreement will be a term of the new occupancy agreement).

2.0 Aims of the scheme

- 2.1.1 The Scheme seeks to ensure that social rented housing across West Northants is allocated to people whose housing needs cannot be met by the general housing market, in a fair, transparent and effective way, having regard to any law, official guidance and good practice.
- 2.1.2 The aims of the West Northants Allocations scheme are to:
- a) have a clear and transparent scheme that provides a fair and consistent approach for assessing and allocating social rented housing
 - b) achieve an appropriate balance of choice against the shortfall of social housing, and ensuring we help that in greatest housing need
 - c) contribute to the development of mixed and sustainable communities
 - d) make best use of the Councils and Registered Provider social rented homes
- 2.1.3 The Scheme will be subject to periodic review, but no later than every two years.

3.0 Scheme outline

- 3.1.1 West Northants Allocations Scheme is a Choice Based Letting Scheme (CBL). This means that applicants have some choice about where they apply to live.
- 3.1.2 West Northants Council will maintain a housing register. Applications to the register are made online at [\(insert link once known\)](#) and assessed using the scheme to determine eligibility and qualification.
- 3.1.3 Allocations will be made with fairness and equity and have regard to the priorities of the scheme. Allocations will also take into account any specific criteria the Local Authority or Registered Providers may have and any restrictions in either a local lettings plan or other planning requirements. See Section 7.24 for information about local lettings plans.
- 3.1.4 There is a high demand for social rented housing across West Northants area and we will balance providing choice and housing need to ensure that housing is offered in a way that helps to best manage the housing stock.
- 3.1.5 The Local Authority will ensure anyone is able to access support to apply and to gain information about the scheme easily. This assistance is available:

Online: xxxxx

Phone: xxxxxxx

Email: xxxxxxx

In person at Council offices – [add addresses](#)

3.2 Equality and Diversity

- 3.2.1 West Northants Council is committed to ensure that the scheme will be accessible, responsive and sensitive to the diverse needs of applicants, and will be at the centre of our decision making and service delivery. The scheme will deliver a quality service without prejudice and discrimination to all its customers, by preventing and eliminating discrimination on the grounds of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex and Sexual Orientation.
- 3.2.2 The Local Authority will carry out appropriate checks on an Applicant's eligibility to be allocated social rented housing and will ensure these checks are not discriminatory on the basis of race, nationality, ethnic origin, or any other protected characteristic as defined by the Equality Act 2010. The Local Authority will monitor the impact of the policy to ensure that it promotes equality of opportunity to all applicants including minority groups.
- 3.2.3 The Local Authority will monitor the performance in screening housing applications for immigration status to ensure that members of ethnic minorities, who are eligible for an allocation of social rented housing, do not experience unreasonably long delays whilst their application is being considered.
- 3.2.4 The Local Authority will train its employees about housing allocation law and practice and the duties and responsibilities under the Equality Act 2010. The Local Authority shall ensure that language and interpretation support is available for Applicants who have difficulty reading, understanding or speaking English.

3.3 Information sharing, confidentiality and data protection

- 3.3.1 The information which an applicant provides relating to their housing application will be treated as confidential in accordance with guidelines on handling personal data. The Local Authority will operate this scheme in accordance with our obligations under the Data Protection Act 2018. Applicants will be advised of their right to make a complaint to the Office of the Information Commissioner if they believe the Local Authority has failed to fulfil its obligations and responsibilities as set out in the Data Protection Act 1998.
- 3.3.2 We will make all applicants aware and ask for their consent when they apply to the West Northants Allocation scheme that their personal information will be held and

shared with our housing providers and other relevant external agencies. This is for the purposes of assessing an application, considering an allocation of accommodation being made or to prevent fraud in accordance with the applicant declaration when making an application.

3.3.3 All personal information will be processed in accordance with the requirements of the Data Protection Act 2018. Applicants have the right to access personal information held about them under the Data Protection Act 1998. For further information please see the Local Authority's Data Protection Policy <https://www.westnorthants.gov.uk/your-council/data-protection-policy>

3.3.4 Applicants have the right to confidentiality. An application will not be divulged to any other party without an Applicant's consent, unless it gives rise to a safeguarding concern. Applicants will be asked to give consent to share relevant details of their application with relevant third-party organisations, such as public authorities, Registered Providers, voluntary organisations and others. Where consent is given, this only extends to those who can provide evidence that can help to determine an application and/or who need to know to process an allocation (e.g. employees of health, social care, criminal justice, social housing organisations, etc). For further information, please refer to the Local Authority's Information Sharing Protocol [insert hyper-link].

3.4 The role of Elected Councillors

3.4.1 Elected Councillors of the Local Authority are prohibited from making decisions about any individual allocation pertaining to any accommodation situated in their electoral ward area or any person who is resident in their electoral ward area.

3.4.2 Elected Councillors may seek to obtain general information about the allocation of housing, can represent their constituents and discuss their cases with administrators of the Allocation Scheme.

3.4.3 Elected Councillors should participate in making decisions about the overall content of this scheme.

3.4.4 Elected Councillors should consider whether the Local Authority's Code of Conduct requires them to declare an interest before participating in such deliberations. If in any doubt, the advice of the Local Authority's Monitoring Officer should be obtained.

3.5 Scope of the Scheme

- 3.5.1 There are a number of cases where provisions about allocations do not apply, these are set out in appendix D.

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4.0 Eligibility

- 4.1.1 To join the West Northants Housing Allocations Scheme an applicant must be both 'eligible' and a 'qualifying person'. When considering applications, the Local Authority will establish if an applicant is eligible for an allocation of accommodation and if they qualify for an allocation of a property. Only if these two criteria are met (subject to certain exceptions set out within this policy) can an applicant join the West Northants Housing Allocations Scheme.
- 4.1.2 Eligible applicants are defined by immigration legislation, this is set out in the Housing Act 1996 [Housing Act 1996 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1996/52).

4.2 Applicants who are eligible

- 4.2.1 The following classes of persons, subject to satisfying a habitual residency test, will be eligible to join this Scheme:
- A. British citizens (constituting the nations of England, Scotland and Wales).
 - B. Commonwealth citizens with a right of abode in the UK immediately before 01 January 1983 who have remained commonwealth citizens throughout (excluding non-British citizens from Pakistan and South Africa, but inclusive of citizens from Gambia and Zimbabwe).
 - C. Irish citizens (constituting the nations of Northern Ireland and Republic of Ireland)
 - D. EEA Nationals (other than those from Ireland) and their family members, who
 - a. have acquired limited leave to enter and remain in the UK
 - b. were frontier working before 31 December 2020, or
 - c. are lawfully residing in the UK by 31 December 2020, but still have to apply to, or acquire status under the EU Settlement Scheme before the deadline of 30 June 2021, and are covered by the "Grace Period statutory instrument"
 - E. Persons exempt from immigration control (e.g. diplomats and their family members based in the UK and some military personnel).
 - F. Persons granted refugee status by the UK Government.
 - G. Persons granted exceptional or limited leave to enter or remain in the UK with condition that they and any dependents have resource to public funds (e.g. humanitarian or compassionate circumstances).
 - H. Persons with current leave to enter or remain in the UK with no condition or limitation, and who are habitually resident in the UK, The Channel Islands, the Isle of Man or the Republic of Ireland (defined as the Common Travel Area) (a person whose maintenance and accommodation is being sponsored must be

resident in the Common Travel Area for five years since date of entry or date of sponsorship, unless the sponsor has died).

- I. Persons who have humanitarian protection granted under the Immigration Rules (e.g. a person whose asylum application has failed, but they face real risk of harm if they returned to their state of origin).
- J. Persons who moved to the UK as child seeking asylum and have been given limited leave to remain.
- K. Persons who have limited permission to enter or remain in the UK, from November 2018 onwards, due to Calais leave.
- L. Persons who have limited permission to enter or remain in the UK as the family member of a 'relevant persons of Northern Ireland.
- M. Persons who have leave to enter or remain in the UK under Appendix Hong Kong British National (Overseas) of the Immigration Rules, and your leave is not subject to a condition requiring you to maintain and accommodate yourself or any person dependent upon you.
- N. Persons who are a relevant Afghan citizen, such as one who has worked for the UK government in Afghanistan.
- O. Persons who have permission to enter or remain in the UK and left Afghanistan in connection with the collapse of the Afghan government took place on 15 August 2021 and are allowed to claim housing and welfare assistance from the state;
- P. Persons who are currently living in the UK and previously was living in Ukraine before 1 January 2022 and left as a result of the Russian invasion which took place on 24 February 2022 and have arrived in the UK under the Ukraine family scheme or the homes for Ukraine scheme and have been granted leave to remain.
- Q. Persons who are currently living in the UK and previously was living in Ukraine before 1 January 2022 and left as a result of the Russian invasion which took place on 24 February 2022 and have arrived in the UK under the Ukraine family scheme or the homes for Ukraine scheme and have been given limited leave to remain
- R. Persons who have been granted limited leave to remain due to being a victim of human trafficking or slavery
- S. Persons who were living in Sudan before 15 April 2023 and left as a result of conflict that commenced on 15 April 2023 and have been granted leave to remain and are allowed to claim housing and welfare assistance from the state and do not have a person that will sponsor your stay in the UK.

4.2.2 EEA Nationals means nationals of any of the EU member states, and nationals of Iceland, Norway, Liechtenstein and Switzerland. A list of countries in the EU and EEA can be found [here](#).

- 4.2.3 Eligibility provisions do not apply to Applicants who are already secure or fixed-term tenants (let at social rent or affordable rent) of Registered Providers seeking to transfer.
- 4.2.4 Even when an Applicant is eligible for an allocation of social rented housing, only those who are habitually resident in the United Kingdom, Ireland, the Isle of Mann or the Channel Islands, will be eligible for an allocation (except persons which exempt from the requirement to be habitually resident, as defined in law or statutory guidance). See Appendix C for details.
- 4.2.5 Applicants who are subject to immigration control or are an ineligible person from abroad will not be eligible for an allocation of social rented housing. See Appendix D for details
- 4.2.6 Where there is any uncertainty about an Applicant's immigration status, the Local Authority shall contact the Home Office. Before doing so, Applicants will be advised that such inquiries will be made in order to comply with data protection legislation. Confirmation of the immigration status of an Applicant from abroad will be obtained, where necessary, from the Home Office by emailing EvidenceandEnquiry@homeoffice.gsi.gov.uk
- 4.2.7 The Local Authority is not subject to the duty arising from the Immigration Act 2014, part 3, chapter 1, to carry-out a 'right to rent' check on each letting. The Local Authority will only perform checks on the eligibility of any Applicant, as per this section of this Scheme.
- 4.2.8 Please note that law on eligibility is complex and is subject to change, and the scheme will be guided by updates to the Allocation of Accommodation Guidance for Local Authorities.

4.3 Habitual residence

- 4.3.1 In order to pass the habitual residence test, the Local Authority will need to be satisfied that a person is actually a resident in the United Kingdom and has both an appreciable period of residence and a settled purpose of establishing residence.
- 4.3.2 Even when an Applicant is eligible for an allocation of social rented housing, only those who are habitually resident in the Common Travel Area will be eligible for an allocation (except persons who are exempt from the requirement to be habitually resident, as defined in law or statutory guidance).

4.3.3 The Local Authority will generally make inquiries into habitual residence where an Applicant has come to live in the United Kingdom during the previous two years, the following tests will be carried out to confirm if an Applicant is habitually resident:

- a) the degree of permanence in the person's residence in the United Kingdom of Great Britain & Northern Ireland, Republic of Ireland, Isle of Man or the Channel Islands
- b) the association between a person and their place of residence
- c) why a person has come to live in the United Kingdom
- d) whether a person is joining family or friends in the United Kingdom
- e) whether a person has accumulated a continuous period of residence prior to making their application
- f) the length of residence in another country
- g) visits abroad for holidays or to visit relatives and other temporary periods of absence will be disregarded
- h) a person's future intentions, employment prospects and centre of interest
- i) exemptions from the habitual residence test include European Economic Area nationals and their family members who are workers or self-employed, or have certain permanent rights of residence, or have been removed from another country to the United Kingdom

4.4 Applicants who are not eligible

4.4.1 Applicants who are subject to immigration control or are ineligible persons from abroad will not be eligible for an allocation of social rented housing. The following classes of person will not be eligible to join the Scheme:

- a) persons not habitually resident in the Common Travel Area
- b) European Economic Area nationals whose only right to reside in the United Kingdom is:
 - i. derived from their status as a jobseeker (or their status as a family member of a jobseeker)
 - ii. an initial right of residence for 3 months
 - iii. derivative right of residence because the person is the primary carer of a British citizen
 - iv. right to reside as a result of the person's deportation, expulsion or other removal by compulsion of law from another country to the United Kingdom (including European Economic Area nationals exercising European Union Treaty rights, who were previously settled in the United Kingdom prior to deportation)

- c) Persons whose only right to reside in the United Kingdom is an initial right for no more than 3 months, including those who would become an unreasonable burden on the social assistance system of the United Kingdom
- d) Persons who are excluded by section 115 of the Immigration and Asylum Act 1999 to entitlement to universal credit under Part 1 of the Welfare Reform Act 2012 or to housing benefit

4.4.2 Where there is any uncertainty about an Applicant's immigration status, the Local Authority shall contact the Home Office. Before doing so, Applicants will be advised that such inquiries will be made in order to comply with data protection legislation. Confirmation of the immigration status of an Applicant from abroad will be obtained, where necessary, from the Home Office by emailing EvidenceandEnquiry@homeoffice.gsi.gov.uk

4.4.3 The Local Authority is not subject to the duty arising from the Immigration Act 2014, part 3, chapter 1, to carry-out a 'right to rent' check on each letting. The Local Authority will only perform checks on the eligibility of any Applicant, as per this section of this Scheme.

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5.0 Qualification

5.1.1 In addition to eligibility criteria, Applicants are subject to the West Northants qualification criteria.

5.1.2 The following groups of persons are non-qualifying and will not be allowed to join the Scheme, or will be removed from the Scheme, as applicable.

Non-qualifying criteria	Section
Persons under 18 years of age	5.1.3
Persons incapable of holding a tenancy	5.2.1
Persons that do not meet the West Northants Local Connection criteria	5.3.1
Persons found guilty of unacceptable or unreasonable behaviour	5.4.1
Persons who have housing related debt	5.5.1
Persons who have breached tenancy conditions	5.6.1
Persons who are homeowners in the United Kingdom or abroad	5.7.1
Persons who have an income and savings above the financial resource limit	5.8.1
Persons who do not have a recognised housing need	5.9.1

5.1.3 **Persons under 18 years of age**

An Applicant incapable of holding a tenancy agreement, which extends to:

- A. Persons defined as a child in English and Welsh law (anyone aged 0 - 17 inclusive).
An exemption will apply to an Applicant who is a child aged 16 or 17, (who may or may not also feature another person(s) aged 16 or 17 as a usual household member(s)), where a tenancy can be granted to a third party (e.g. an adult relative or friend or corporate parent, etc), 'a trustee', and held on trust for the child until they reach the age of 18 years. An exemption will also apply if there is a person aged 18 years or over who is willing to enter into a joint tenancy agreement with a child.

- B. Persons defined as a child in need as a result of a statutory assessment carried out in accordance with Children Act 1989, section 17. When making decisions about the qualification of a child aged 16/17 or an adult (a person aged 18 years and over) who is leaving the care of the Local Authority, full regard will be made to joint protocol agreed (16/17 year old protocol and the Care Leavers protocol) between Northamptonshire Children's Trust and Housing Services for rehousing care leavers. Former care leavers aged 18 years or older fall outside the scope of

this section and determination as to whether they qualify will be based on any or all relevant factors in the entirety of chapter 5.

5.2.1 **Persons incapable of holding a tenancy**

5.2.2 Persons lacking mental capacity as defined in the Mental Capacity Act 2005 who are unable to hold a tenancy agreement, meet the obligations of holding a tenancy or make informed decision relating to an offer of accommodation will not usually be awarded a tenancy without a nominated person with lasting power of attorney (finance), enduring power of attorney or authorisation from the Court of Protection prepared to sign a tenancy agreement on the applicant's behalf and the Local Authority is satisfied that the necessary support to sustain a tenancy is in place.

5.3.1 **Local Connection criteria**

5.3.2 An Applicant who does not have a minimum of two years continuous connection to the West Northants area immediately prior to the date of application and will need to satisfy any of the following factors (exemptions apply to Applicants who are survivors of domestic abuse and Armed Forces personnel):

- A. **Residence** - a connection is established by being normally resident within the Local Authority area, by their own choice for a minimum period of two years. Being normally resident includes permanent housing but also includes anyone who has nowhere to live, occupying interim accommodation provided under the Local Authority's homelessness duties, community care duties, or other duties.

Persons who have been detained in the Local Authority (e.g. in prison or hospital) will not be able to establish a local connection as this does not constitute a choice of being resident in the area. Nor will former asylum seekers who were previously accommodated under Immigration and Asylum Act 1999, section 98 (temporary support) or section 4 (hard cases support), or former asylum seekers previously accommodated under the Asylum Seekers (interim Provisions) Regulations). Exemptions to residence conditions will apply to:

- i. Homeless households and care leavers owed a duty by the Local Authority placed outside the local authority area
- ii. Transfer Applicants under-occupying and living within the West Northants area and wish to downsize to a smaller home

B. Employment – a connection established by employment of no less than two years duration (including an apprenticeship) will be limited to the usual place of work.

Applicants who are self-employed, or their profession requires them from time to time to work outside the area, will need to demonstrate that their employment has mainly been based in West Northamptonshire.

Applicants on leave due to maternity leave or sickness who remain employed will qualify for this criterion if there is no reason to believe their employment is due to cease.

Any work that is short-term (e.g. a fixed-term contract), marginal (e.g. less than 16 hours per week and earnings allow for claiming Universal Credit or entitlement to Working Tax Credits), ancillary (e.g. occasional (even regularly) work that is undertaken in the Local Authority area, but the main place of work is outside the Local Authority area) or voluntary (e.g. where no payment is received, or payment is made only for expenses) will not be taken into account.

An exemption will apply for Applicants who need to move to take-up an offer of work. When deciding whether to apply an exemption, the Local Authority will consider evidence (the following list is not exhaustive and the Local Authority will consider any other appropriate factors and local circumstances):

- a) the distance and/or time taken to travel between work and home.
- b) the availability and affordability of transport, taking into account the level of earnings.
- c) the nature of the work and whether similar opportunities are available closer to home.
- d) other personal factors, such as medical conditions and childcare, which would be affected if a move could not take place.
- e) the length of the work contract.
- f) whether failure to move would result in the loss of an opportunity to improve their employment circumstances or prospects, such as taking a better job, a promotion, or an apprenticeship.
- g) in circumstances where a job is being offered, and there is a need to move to take it up, and their intention to take up an offer of employment.
- h) verification of employment, or an offer of employment, and acceptance of it from the employer, such as:
 - i. a contract of employment,
 - ii. wages/salary slips or bank statements in cases of zero hours contracts,

- iii. proof of receipt of tax and benefit information,
- iv. a formal offer letter.

- C. **Family associations** – a connection established by family relationships will be limited to immediate family members (defined as spouses/partners, parents, step parents or other legal guardians, children or step children (aged 18 and over), siblings and step siblings or grandparents where there are sufficiently close links in the form of frequent contact) and their residence being within the Local Authority for a minimum period of two years. An Applicant who can prove they have a continuing caring responsibility for someone who is resident in the Local Authority area, and that this care could not be provided unless they were resident in the region, will be exempt from local connection requirements.
- D. **Other special reason** – Applicants who need to be near special medical or support services which are only available in the Local Authority area will be exempt from local connection requirements.
- E. **Care leavers** – An Applicant aged 18-21 years (or up to 25 years old if they are pursuing a programme of education agreed in their pathway plan), who are owed a duty under Children Act 1989, section 23C, by the Local Authority will be deemed to have a local connection to the Local Authority area.

5.3.3 Local Connection exceptions

5.3.4 The local connection criteria will not apply to the following applicants:

- a) An Applicant where the Local Authority has accepted a full statutory homelessness duty under S 193(2), S195(2), or (189B) of Part 7, Housing Act 1996
- b) An Applicant who are victims of domestic abuse or threats of domestic abuse, or escaping domestic abuse or harm, will be exempt from local connection requirements, as will those who have sought a place of safety in a refuge or other form of temporary accommodation in the Local Authority area.
- c) An Applicant who are members of the Armed Forces community:
 - i. An Applicant who are currently serving in the Regular Armed Forces or were serving in the Regular Armed Forces at any time in the five preceding years of their application, and their spouses.
 - ii. An Applicant who are a bereaved spouse or civil partner, of a person who was serving in the Regular Armed Forces, where the bereaved spouse or civil

partner has recently ceased, or will cease, to be entitled to reside in Ministry of Defence accommodation following the death of their Service spouse or civil partner and the death was wholly or partially attributable to their service.

- iii. An Applicant who are serving or former members of the Reserve Armed Forces who are suffering from a serious injury, illness or disability which is wholly or partially attributable to their Service.
- iv. An Applicant who are divorced or separated spouses or civil partners of Service personnel, who are required to move out of accommodation provided by the Ministry of Defence.
- v. An Applicant who are adult children of service personnel who are no longer able to remain in the family home due to the impact of their family moving from base-to-base.

5.3.5 An Applicant who meets any of these exceptions will need to provide supporting evidence.

5.4.1 **Unacceptable or unreasonable behaviour**

5.4.2 An Applicant or a member of their household, who have been guilty of past unacceptable behaviour serious enough to make them unsuitable to be a social housing tenant or would be serious enough that a county court judge could make an outright order for the Local Authority to obtain possession, had the Applicant been a tenant at the time the unacceptable behaviour was carried out.

5.4.3 The meaning of unacceptable behaviour for the purpose of this Scheme will encompass a past action or activity (including an omission, failure to act, passivity or inactivity) on the part of the Applicant or a present member of their household. An Applicant will be considered unsuitable to be a tenant if there has been no improvement in their behaviour since the date when the unsuitable behaviour occurred, to the date when a decision is made about their application and/or when an allocation of social rented housing is due to be made. The Local Authority will not take account of any behaviour relating to a spent conviction under the Rehabilitation of Offenders Act 1974, section 4(1). Unacceptable behaviour is defined as:

- a) having an unspent conviction of a serious offence, committed in the locality of their property, against a person with a right to reside or occupy accommodation.
- b) having an unspent conviction of a serious offence, committed elsewhere against the Local Authority or a Registered Provider or agents acting on their behalf, which directly or indirectly was related or affected carrying out housing management functions

- c) perpetrators of domestic abuse who are subject to a non-molestation order, an injunction order, an occupation order or a restraining order, which is in force at the date an application is being determined.
- d) having an unspent conviction at the date an application is being determined for a serious offence as defined by the Serious Crime Act 2007, Part 1, Schedule 1, committed in the locality of a property against another person or the Local Authority or a Registered Provider.
- e) breaching a provision of an injunction under section 1, conviction under section 30, or an order made under section 80 of the Anti-social Behaviour, Crime and Policing Act 2014, which occurred in the locality of a specified property or elsewhere which caused nuisance, annoyance, harassment, alarm or distress to a person in the locality or the Local Authority or a Registered Provider, or resulted in access to property that has been prohibited under section 76 of the Anti-social Behaviour, Crime and Policing Act 2014, for a continuous period of more than 48 hours.
- f) having an unspent conviction for an offence under section 80(4) or 82(8) Environmental Protection Act 1990, concerning noise from a property which was a statutory nuisance as per section 79(1), Part 3 of the Environmental Protection Act 1990.
- g) having an unspent conviction for an offence under the Fraud Act 2006, Forgery and Counterfeiting Act 1981 or Social Housing Fraud Act 2013, involving withholding, falsifying or misrepresenting any information to access to be allocated social rented housing or sub-letting of social housing by current tenants.
- h) within the past previous 5 years (having committed any other behaviour that would give grounds for possession under Housing Act 1985, section 84, Schedule 2, Part 1, Grounds 1-7 and section 84A. This includes an Applicant being responsible for:
 - i. Causing nuisance or annoyance to other people; living, visiting or carrying out lawful activities in the locality of their home, and/or employees of the Local Authority, or people employed by other organisations, to carry out housing management functions, for the Local Authority.
 - ii. Causing an offence or another adult residing with them causing an offence, for which they were convicted which took place during and at the scene of a riot in the UK.
 - iii. Causing violence or threats of violence towards another person or their family members, who were living at the same property as the Applicant, which resulted in them leaving and being unlikely to be allowed to return to the property.
 - iv. Allowing acts of damage or neglect of their property or common parts of a building in which their property is situated or failing to take reasonable

steps to stop any person residing with them to cause acts of damage or neglect to the property.

- v. Allowing internal structures and amenities (doors/ walls etc) and furniture provided by a landlord for use as part of their tenancy, or for use in common parts, to deteriorate due to ill-treatment, and in a circumstance where a lodger has caused the ill-treatment, not taking reasonable steps to evict that lodger.
- vi. Being granted a tenancy as a result of deliberately making a false statement, made by themselves or another person at their prompting.

5.5.1 **Housing related Debt**

5.5.2 An Applicant or a member of their household who has outstanding liabilities (such as rent or service charge arrears, or recharges) attributable to a tenancy which are more than 1/12th of the annual amount payable (or which was payable) by an Applicant to a landlord in respect of a tenancy.

5.5.3 When determining a realistic repayment agreement, there will be an emphasis on an Applicant's willingness to address the debt and to come to an agreement to do so, along with evidence of regular affordable payments (of at least 3 monthly or 12 weekly consecutive payments). Any agreement will be based on the affordability of an Applicant, rather than the level of debt. Efforts will be made to take into consideration why the arrears have arisen. The urgency of an Applicant's housing need will also be of paramount importance.

5.5.4 Housing related debts included in Debt Relief Order will remain outstanding until 12 months from the date of issue, at which point the debts are formally written off by creditors and the debtor is discharged. Households owed a statutory homeless duty will be exempt from the 12-month criteria.

5.5.5 For the purpose of this Scheme, outstanding rent arrears or debts which fall within the following categories will be disregarded:

- a) any outstanding liability (such as rent arrears) attributable to a tenancy of which the Applicant (or a member of their household) is not, and was not when the liability accrued, the tenant.
- b) any rent or other liability which is outstanding, but where the amount outstanding is less than 1/12th of the annual amount payable (or which was payable) to a landlord in respect of a tenancy, or the Applicant has both (i) agreed payments with a landlord for paying the outstanding liability, and (ii)

made payments in line with that arrangement for at least three months and is continuing to make such payments.

- c) any outstanding liability of an Applicant or anyone who will live with them, which does not relate to the tenancy of a property.
- d) any outstanding liability that has been declared unenforceable or statute barred (e.g. any debts that can no longer be recovered through court action). For rent arrears this will be after six years. (Debts which are subject to court action before the unenforceable period begin will not become statute barred).

5.6.1 Breaches of tenancies

An Applicant or a member of their household who have been found to have breached any of the following tenancy conditions, within the past six years, regardless of tenure:

- a) purposely failing to report repairs.
- b) failing to allow contractors to enter the property to carry out maintenance.
- c) running a business from the property without permission from the landlord.
- d) Subletting part or the whole of the property without permission
- e) having an unspent conviction for using or allowing their property to be used for illegal or immoral purposes.
- f) Or any other scenario that would give grounds for possession under Housing Act 1985, section 84, Schedule 2, Part 1, Grounds 1-7 and section 84A.

5.7.1 Property ownership

5.7.2 An Applicant or a member of their household who are homeowners and have a legal right to occupy their own home (either freehold, leasehold, under mortgage or shared ownership) will not qualify subject to the exceptions below (disregards apply to An Applicant who have survived domestic abuse).

5.7.3 Where an Applicant has sold a property within the last five years, and the funds received from that sale would have allowed them to meet their housing needs, but they have disposed of these funds, the Local Authority reserves the right to disqualify them from the Scheme.

5.7.4 If an Applicant has transferred the ownership of their homes to family members, within the last five years, and the proceeds of a sale could have allowed the Applicant to meet their housing need, the Local Authority reserves the right to disqualify them from the Scheme. The following exceptions will apply:

- a) property has been valued as having negative equity (or limited equity in respect of disabled adaptation to be made).
- b) where the property has not been let, but the owner cannot secure entry to the property, for example due to it not being safe to enter the property due to severe structural faults, or there are squatters living in the property.
- c) where it is probable that occupying the property will lead to abuse from someone living in the property.
- d) where it is probable that occupying the property will lead to abuse from someone whether in that property or elsewhere.
- e) where the Local Authority has issued a Prohibition Order under the Housing Act 2004 due to continued occupation of the property may endanger the health of the occupants and there are no reasonable steps that can be taken by an Applicant to prevent that danger (e.g. where it is not possible to adapt a property due to the physical arrangements of a dwelling, or the cost of adaptations is prohibitive, or an Applicant is in negative equity).
- f) the Applicant or a member of their household does not have the financial resources in respect of the value or sale of the property as set out in 5.8.1 below.
- g) an applicant of state pension age and over who cannot stay in their own home and need, based on medical/welfare to move into sheltered, supported or assisted living accommodation where the nature of their current accommodation does not meet their needs and they do not have sufficient resources to meet their housing need elsewhere.

5.8.1 **Income and Savings**

5.8.2 An Applicant or a member of their household with financial resources consistent with the United Kingdom Government's upper limit for savings, this is currently set out as £16k within the common rules of the Department of Work and Pensions Benefit and Pension Rates (disregards apply to Armed Forces personnel). This upper savings limit will change in line with the DWP Benefit and Pension rates.

5.8.3 An Applicant / joint applicant who has a high income, defined in this context as at least £60,000 gross household income in the most recent tax year ending prior to them making application to join the scheme and/or being made an offer of accommodation (disregards apply to applicants who have survived domestic abuse). Household income includes any income received by the Main/Joint applicant.

5.8.4 An Applicant whose qualification would solely derive from a household member who is subject to immigration control, due to them not being entitled to freely enter or

remain in the United Kingdom, or not being entitled to public funds, will not qualify to join the Scheme.

5.8.5 Property ownership conditions, plus thresholds for Income and savings will not be applied to Applicants who are victims of domestic abuse or threats of domestic abuse or escaping domestic abuse or harm.

5.8.6 Any compensation for an injury or disability sustained on active service with the Armed Forces or Reserve Forces will be disregarded when calculating financial resources. Any mesne profit debts accrued by occupants of service families accommodation will be disregarded, subject to them providing a copy of their notice to vacate or Certificate of cessation of Entitlement to Service Families Accommodation (the Local Authority may contact the Ministry of Defence Loss of Entitlement team by emailing DIORDAccn-LOETeam@mod.gov.uk with any queries about the status of such Applicants).

5.9.1 **No housing need**

5.9.2 An Applicant who have no assessed housing needs will not qualify on this Scheme. However, any person can access advice and assistance on other housing options from the Council's Housing Solutions Team. If an applicant does not fall into any of the priority bands they will be regarded as having no housing need / being adequately housed.

5.9.3 The following exception will apply:

5.9.4 Where an Applicant has no housing need but establishes a local connection within a local lettings policy in relation to a rural exception site (including entry level exception sites) (as determined in relevant legal agreements). The local connection as determined in the relevant agreements, will be specific to the village where the development is located, or a neighbouring village, and will be permitted to join the housing register but will only qualify to bid on properties where the rural exception development is to which they satisfy a local connection. Local connection to such sites will be verified at the point of application and at the point of nomination.

5.9.5 Preference will be given to applicants who meets the local connection criteria to the rural exception site development, who also falls within a reasonable preference category. If there are no exception site applicants who also fall within a reasonable preference category, then preference will be given to other exception site applicants in Band 4 in accordance with their effective date.

6.0. Registration

6.1 Information and Advice

6.1.1 Information and advice will be made available in writing via the website of the Local Authority and in-print where an Applicant is unable to access the website.

6.1.2 Information and advice will also be provided orally via the telephone or videotelephone, or, when an Applicant is unable to communicate via this media, in-person either at an office of the Local Authority or at their home or other appropriate location when they are unable attend an office of the Local Authority.

6.1.3 The Local Authority will consider requests for information in translated and alternative formats (e.g. Braille, large print, audio etc) and provide materials as relevant. The special needs of specific groups of prospective Applicants (e.g. those housebound, prisoners, gypsies and travellers, etc), will be taken account of when making any arrangement to access and provide information and advice.

6.1.4 The Local Authority will provide any person, regardless of whether or not they intend to make an application to this Scheme, information about:

- i. The social housing in its area and other housing options.
- ii. Rights to make an application for an allocation of social rented housing.
- iii. The rules associated with initial consideration of an Applicant's application to join this Scheme, plus the treatment of any nomination for social rented housing made by the Local Authority to a Registered Provider.
- iv. Potential stock availability.
- v. Eligibility, qualification and prioritisation criterion for joining the Scheme and being offered an allocation of social rented housing by the Local Authority and being offered a nomination of social rented housing.

6.1.5 The Local Authority will provide Applicants with the following general information accompanied by a free summary of this Scheme:

- i. How their application is likely to be treated.
- ii. Whether or not they have been accepted as being eligible for an allocation or any reasons for being determined as ineligible
- iii. Whether or not they qualify to join the Scheme and, where not, the reasons for being disqualified.
- iv. The type of property they are likely to be allocated and the number of bedrooms they might be entitled to have.

- v. The method that will be used in assessing their needs.
- vi. The number of other Applicants with equal or greater priority.
- vii. An assessment of the likely time that they will have to wait to receive an offer by reference to average waiting time or the number of allocations of similar properties, based on data available for the most recent 12-month period.
- viii. Any facts about the Applicant's case which have been or will be taken account of when making decisions.
- ix. The right to request a review of any decision that they are not eligible and/or do not qualify to join the Scheme, or concerning an allocation or nomination of social rented housing.
- x. Any review decision, along with the grounds for that decision in a written acknowledgement.
- xi. The right to seek a judicial review on any point of law where this Scheme (or the administration of it) is irrational, illegal, or fails to follow public law procedural requirements.

6.2 Assistance for vulnerable applicants

6.2.1 The Local Authority will freely help Applicants who are likely to have difficulty in making an application (e.g. due to mental or physical impairment, or because of any other special characteristic) to join the Scheme. This assistance will include (this list is not intended to be exhaustive):

- i. Completing any form that might exist.
- ii. Explaining what evidence might be required for the Local Authority to determine any eligibility and qualification criterion that might be in force and help collect this evidence for assessment.
- iii. Explaining what evidence might be required to determine the degree of priority for when allocations are made and help collect this evidence for assessment.
- iv. Explain what evidence might be required to help determine the type of property that should be allocated and help collect this evidence for assessment.
- v. Express a preference of the location of the social rented housing they might be allocated.

6.2.2 The Local Authority is subject to the Equality Act 2010 which has been duly considered when formulating this Scheme. A separate *Equality Impact Assessment* has been completed and copies can be requested from the Local Authority or downloaded from its website. The *Equality Impact Assessment* has identified any potential impact on people with a protected characteristic, showing these as positive, negative or neutral,

plus includes actions to mitigate any such negative impacts. To ensure compliance with public sector equality duties, the following arrangements will be made by the Local Authority and/or Registered Providers for each individual Applicant with a relevant protected characteristic, such as persons who have a disability:

- i. Assistance to make an application, including exercising any choice they might be entitled to.
- ii. Via a specific question at the application stage, to identify the housing needs.
- iii. Provide information on a property's accessible features.
- iv. At the stage of offer or nomination, to allow extra time, (of a duration relevant to the circumstances of any given case) to determine whether or not to accept an offer.

6.2.3 The Local Authority will maintain a list of suitable homes for disabled people with access needs, to avoid potentially disadvantaging Applicants who might require a home with such features.

6.2.4 The Local Authority will advise Applicants that equalities information will be collected, to enable a better understanding of peoples' housing needs and to ensure that no one is discriminated against as a result of the way this Scheme has been framed, or during the administration of it. Applicants will be informed as to how such data will be used, handled and stored.

7.0 Assessment of an Application

7.1 Assessment of need

7.1.1 Only Applicants who have been assessed as eligible and who qualify will have their housing need assessed.

7.2 Housing need

7.2.1 Reasonable preference

7.2.2 The Council is required by law to determine the relative priority that housing applicants are awarded. This is particularly important as the demand for social housing is greater than the availability of homes.

7.2.3 The law, as it applies to local housing authorities, requires that reasonable preference for housing must be given to those in the categories set out in the Housing Act 1996 (as amended). Applicants with reasonable preference must be given a reasonable head-start in terms of accessing housing over those who do not have reasonable preference. Reasonable preference does not mean that applicants will have an absolute priority over all other Applicants.

7.2.4 The statutory reasonable preference categories in section 166A (3) to I of the Housing Act 1996 (as amended) are:

- a) People who are homeless (within the meaning of Part VII of the 1996 Act)
- b) People who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under section 192(3)
- c) People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- d) People who need to move on medical or welfare grounds, including grounds relating to a disability
- e) People who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others).

7.3.1 Medical needs

7.3.2 Applicants or members of the applicant's household who have applied due to medical or welfare need, will be assessed on information provided by recognised medical professionals, for example your GP, a consultant or occupational therapist, with direct knowledge of the Applicants or a member of their households health and the impact on their housing needs.

7.3.3 The Local Authority will only consider this information if it is demonstrated that:

- i. The medical condition is being caused by or made worse by the applicant's housing condition **and**
- ii. the applicant's current property cannot be improved or adapted to meet the needs of the applicant at a reasonable cost **and**
- iii. rehousing is likely to significantly improve the Applicants conditions.

7.3.4 The Local Authority will not consider an application on medical grounds for the following:

- i. health problems that are not affected by your housing or where health problems cannot be improved by moving accommodation
- ii. medical issues which relate to housing defects which can be resolved by action taken by you, or your landlord
- iii. you are homeless and the temporary accommodation provided by the Local Authority is affecting your medical/welfare needs. This is because the local Authority would review the suitability of the accommodation if it is impacting on your health and welfare.
- iv. the medical issue relates to someone who is not part of your household.

7.4.1 Welfare needs

7.4.2 If you are applying for housing due to welfare related issues we will assess your application based on information provided by professionals for example Police; Social Services; support agencies; or a medical Consultant.

7.4.3 We will only consider this information if it is demonstrated that:

- i. there is a need which has not been covered elsewhere in this policy
- ii. this need could cause significant hardship if it were not met
- iii. your welfare need will only be met by a move into a Council or housing association property

7.4.4 Medical and welfare prioritisation

7.4.5 Medical /welfare banding decisions will be made following an assessment and if you are found to have a medical / welfare need you will be awarded one of three bands:

1. Band A – Urgent medical/ welfare needs
2. Band B – High medical / welfare needs
3. Band C – Medium medical / welfare needs

7.4.6 **Band A:** Urgent Medical need - Condition is expected to be life threatening and/or terminal and re-housing is required to address the detrimental effect caused by the current accommodation, either due to the location of the present accommodation and / or due to the physical conditions of that accommodation.

7.4.6 The applicant would be awarded Band A – Urgent / welfare medical needs if the accommodation is no longer suitable to the applicant or a member of their household, where one or more of the following circumstances apply:

- i. are housebound and unable to access or exit your home due to your medical and housing conditions
- ii. require the permanent use of substantial medical equipment at home, such as kidney dialysis equipment, or mobile or ceiling track hoists, but your property, or landlord, prevents you from having this
- iii. are a full-time wheelchair user requiring wheelchair adapted housing and your current home is not wheelchair adapted or suitable for adaptation,
- iv. have moderate to severe dementia and your property is becoming unsafe for you,
- v. have had severe strokes or traumatic brain injuries resulting in a loss of function on one, or both, sides of the body,
- vi. have advanced Motor Neurone Disease or Multiple Sclerosis.
- vii. live in a home which is now unsafe for you due to a change in your medical condition or mobility e.g. you have become severely sight impaired and are now at significant risk of injury due to falls.
- viii. have developed epilepsy, are subject to regular seizures which cannot be controlled by medication and you live in a property with stairs, or which can only be accessed by stairs.
- ix. are serving or have served in the Armed Forces and are suffering from a serious physical injury, serious mental or physical illness or disability which is attributable (wholly or partly) to that service

7.4.7 **Band B:** High medical / welfare need

7.4.8 The applicant or a member of their household would be awarded Band B – High medical /welfare needs if the accommodation is no longer suitable to the applicant or a member of their household, if one or more of the following circumstances apply:

- i. have significant back or knee problems and have difficulty carrying children or shopping upstairs,
- ii. are severely vulnerable due to frailty or advanced age and need to move to sheltered, supported or extra-care accommodation
- iii. have a severe and enduring mental illness which they are no longer able to manage and where a move would substantially improve your wellbeing,
- iv. have bilateral arthritis of the hips and knees and use mobility equipment, and are struggling to enter or leave the home.
- v. have a chronic or progressive medical condition (example: MS)
- vi. have had moderate strokes with recovery of some function,
- vii. have chronic obstructive pulmonary disease or emphysema and are unable to get around in the home.
- viii. have Schizophrenia or Bipolar Affective Disorder, which they are no longer able to manage because of the current living conditions
- ix. have an Autistic Spectrum disorder with behavioural problems, global developmental delay or moderate to severe learning disabilities and the current home is becoming unsafe or causes an impact on other family members. If it is agreed to award an extra bedroom for the applicant, or a member of your household, they will not receive an overcrowding band but will be able to bid for properties with one bedroom more than their needs as defined under the bedroom standard.
- x. are transitioning and there is medical and psychiatric evidence to support the need for their own room whilst undergoing transition, particularly in the case where gender re-assignment surgery is taking place. If it is agreed to an award an extra bedroom, the Applicant will not receive an overcrowding band but will be able to bid for properties with one bedroom more than their needs as defined under bedroom standard.
- xi. have cardiomyopathy or congestive cardiac failure or lung disease and can no longer manage the stairs in their home.
- xii. requires ground floor accommodation (or a stairlift) AND requires alternative bathing facilities to that in current accommodation on medical and / or social care grounds where it is not possible to adapt the current property
- xiii. are serving or have served in the Armed and are suffering from a physical injury, mental or physical illness or disability which is attributable (wholly or partly) to that service

- xiv. need to give or receive essential care and support that is substantial and ongoing and cannot be provided from or in their current accommodation. Applicants may either be in receipt of Carers Allowance or have a carer who is in receipt of Carers Allowance or have had an assessment by social services or similar support agency, so it can be established that care and/or support is substantial / essential
- xv. has a learning disability and needs to move into mainstream accommodation. This decision will be based on an assessment made by the Learning Disabilities Team.
- xvi. have undergone lengthy rehabilitation in residential surroundings and are ready to attempt independent living in the community;
- xvii. need to move on from drug or alcohol recovery program. The applicant is ready to move-on from a recovery program, and has been accepted as ready for independent living by a relevant support provider where it is not possible or appropriate to return to their former home
- xviii. moving on from short-term supported housing and hostels, including specialist accommodation for those with mental health issues. The applicant is ready to move-on from an approved supported accommodation provider or care in West Northamptonshire. The applicant must have been accepted as ready for independent living by a relevant support provider.

7.4.9 **Band C** – Medium medical / welfare needs

7.4.10 The applicant or a member of their household would be awarded Band C – medium medical /welfare needs if the accommodation is no longer suitable to the applicant or a member of their household, if one or more of the following circumstances apply:

- i. is otherwise adequately housed but the applicant, or a member of their household, has a medically diagnosed condition which means that they need access to their own secure, outside space for example those with autism; ADHD; a learning disability, or has an assistance dog.
- ii. is living in a property which is having a detrimental impact on their health / welfare and there are no remedies available to improve the conditions:
 - a. Need improved heating on medical or social care grounds
 - b. Living in a building with poor sound-proofing and day to day living noises from their neighbours is impacting on their wellbeing.
- iii. A family association who is not applying to move with the Applicant, but they have a medical need which restricts the use of their accommodation and requires the applicant to find alternative accommodation
- iv. time related medical issues, for example pregnancy, or a broken leg.

- v. is becoming socially isolated due to own or public transport no longer being readily available , for example due to limited mobility and bus routes changing and unable to access services required

7.5 How to Apply

- 7.5.1 If a person wants to join the West Northants Housing Allocation Scheme, they will need to complete an online application form through our choice-based lettings scheme. Whenever necessary, the Local Authority will also arrange for applications to be completed by other means such as when an Applicant is having difficulty completing the prescribed online form, this includes where a person with a protected characteristic, needs or requests an alternative method.
- 7.5.2 Applicants will be provided with a user account to securely log into via the Scheme website. The Local Authority will primarily communicate with Applicants via their user account:, to provide them with information and advice, give assistance, issue warnings about fraud, seek further evidence or clarify matters relating to evidence already submitted, make notifications as whether someone is eligible and qualifies to join the Scheme, notify that a renewal application is required, make an offer of an allocation, confirm whether an Applicant wishes to accept an offer of an allocation and other matters relating to their application. Whenever necessary, the Local Authority will also communicate with Applicants via other means, such as email, telephone/video telephone, letter/leaflet or in-person, etc, such as when they are having difficulty using their Scheme user account. This, includes where a person with a protected characteristic, needs or requests an alternative method of communication.
- 7.5.3 All applications must be made using the prescribed online Housing Assessment form published by the Local Authority.
- 7.5.4 Copies of the application form can be accessed from the Scheme website [\[insert hyper-link\]](#). Applications can only be made by a sole individual, all other persons who might presently live with the Applicant can feature as usual household members. Multiple applications are not allowed. An Applicant may have only one active application with the Local Authority (but is entitled to have active applications with other local authorities and/or Registered Providers).

7.6.1 Supporting documentation

- 7.6.2 Consideration of an application will be based on the information provided on the application form, plus any evidence supplied by an Applicant (e.g. proofs of identify,

etc), or information gained from public bodies (e.g. prisons, young offender institutes, secure training centres, secure colleges, youth offending teams, probation services, DWP/Jobcentre Plus, social services authorities (adult social services and child social care), NHS Trusts and NHS Foundation Trusts, Ministry of Defence, general medical practitioners, schools, police, etc), Registered Providers, voluntary organisations, land registry and credit agencies and any other persons or organisation that might be able to provide or verify evidence relevant to a person's application.

- 7.6.3 In addition to the application, the following documents (where available) must be submitted as evidence to verify the information provided by the main Applicant:
- a) Passport, to help determine eligibility to rent social housing in England.
 - b) A utility or Council Tax bill or other relevant documentation from the past three months, to help determine eligibility to rent social housing in England.
 - c) Birth certificate, to help determine qualification to join the Scheme.
 - d) Details of any relevant unspent convictions (see section 4.13), to help determine qualification to join the Scheme.
 - e) All financial records from the past three months relating to income and savings, to help determine qualification to join the Scheme.
 - f) All legal records relating to property ownership to help determine qualification to join the Scheme.
 - g) Any other information that helps to determine eligibility and/or qualification to join the Scheme.

7.7.1 Cancelling a housing application

- 7.7.2 A housing applicant's housing application will be cancelled in the following circumstances:
- a) at the Applicant's request
 - b) When the Applicant either becomes ineligible for housing or ceases to qualify for inclusion onto the Scheme
 - c) When the Applicant has been housed through the Scheme or in relation to those who are owed a homelessness duty, they have accepted an offer of suitable accommodation, which has resulted in the duty has been discharged
 - d) When the Applicant accepts an Assured Shorthold Tenancy
 - e) When the Applicant fails to maintain their housing application, or they move home and fail to provide the Local Authority with the relevant contact details and update their application to reflect their new housing situation
 - f) When the Applicant fails to respond to a request for further information within the specified time
 - g) When the Applicant fails to respond to the annual review

7.8.1 Renewal of Applications

7.8.2 Applicants will be required to renew their application annually, from the anniversary of being accepted to join the Scheme. Failure to renew an application will result in an application being closed and membership of the Scheme being discontinued. Applicants will have 21 days from receipt of this information to comply with the renewal request. Failure to comply will result in an Applicant being removed from the Scheme.

7.9.1 Application processing standards

7.9.2 The Local Authority will aim to process applications within 33 working days, after an Applicant has submitted a completed application and all supporting documents.

7.9.3 Any application which gives the Local Authority a reason to believe a person may be homeless or threatened with homelessness will trigger inquiries as to what duty of assistance, if any, is owed under Housing Act 1996, Part 7 (as amended). Any information provided by an Applicant in support of their application to join the Scheme, or to determine the degree of priority they might be entitled when social rented housing is being allocated via this Scheme, or what might constitute a reasonable offer under the Scheme, will be used, along with any other relevant evidence to determine what homelessness duty, if any, is owed by the Local Authority. Such inquiries and any subsequent assistance a person might be entitled to are outside the scope of this Scheme. The Local Authority has separate arrangements to administer public law homelessness duties. Contact details for which are as follows

- A. [insert name of service]
- B. [insert address]
- C. [insert phone number]
- D. [insert email address]
- E. (insert website link)

7.10 Who can be included on an application

7.10.1 The applicant should include on their housing application other persons who normally reside with them or who would reasonably be expected to reside with them as a member of their household. All household members who will be living in the new tenancy must be included on the application in order that qualification checks can be conducted. Applicants and household members can only be included in one West Northamptonshire housing application.

7.10.2 The following can be included on an application if they normally live with the applicant(s) or could reasonably be expected to do so:

- a) Partner or spouse,
- b) Children dependent on the applicant / joint applicant
- c) Adult children
- d) Other adults who are dependent on the applicant / joint applicant

7.10.3 Other people will only be considered if there are demonstrable extenuating circumstances that require them to live with applicants; for example, to provide or receive ongoing and substantial care which can be evidenced.

7.10.4 In all circumstances, the Local Authority may decide whether a person is normally resident as a member of the applicant's family and whether they will be considered for rehousing as a member of the applicant's household. The Local Authority will consider each applicant's individual circumstances when deciding whether to allow persons to be included on the application.

7.11.0 Dependent children

7.11.1 A dependent child is defined as being aged 0-15 years, or 16-18 years and attending or enrolled in full-time approved non-advanced education or training. The Local Authority will usually expect that an applicant receives Child Benefit in respect of dependent children.

7.12.2 In determining whether a dependent child can be considered as part of the household where there is shared parental responsibility, the Local Authority will consider whether there is a sufficient degree of permanence or regularity to constitute normal residence as a member of the family. The Local Authority may also consider the demand for and supply of accommodation, as well as any under occupation which may result where a child spends part of a week with one parent and part of a week with another.

7.12.3 Factors that that Local Authority will consider include:

- a) who has the main parental responsibility of the child / children?
- b) what is the child's main and principal home?
- c) what address is registered with GP/School/Nursery?
- d) who predominantly cares for the child?

7.13.0 Adult Children, other non-dependents

- 7.13.1 Non-dependent children are defined as any children of the applicant or joint applicant who do not meet the definition of a dependent child. A non-dependent child is usually aged 18 years or over or aged 16/17 and who is not attending or enrolled in any full-time approved non-advanced education or training.
- 7.13.2 Where the household includes people aged 18 years or over that are capable of living independently, the Local Authority will assess the needs of the whole household and may refuse to allow them to be included on an application, for example if it is unable to meet the need through existing social housing in West Northants.
- 7.13.3 The Local Authority may require such non-dependent members of the household (including adult children, or extended family members) to apply for housing separately.
- 7.13.4 The Local Authority will allow adult children living with their parents who are serving in the armed forces or resident at university to be included on an application. In these circumstances their parental home will be considered as their principal home.
- 7.13.5 Where it is determined that an adult child, or other non-dependent is not capable of living independently, for example because of a disability or severe learning difficulties, family accommodation may be awarded if it benefits the wellbeing of the household.

7.14.0 Split and non-traditional households

- 7.14.1 Applications are welcomed from persons who live at two separate addresses, or applications from non-traditional households e.g. friends, but who wish to live together at one single address, one person will have to feature as the Applicant (although an Applicant together with one or more other persons might be able enter into a joint tenancy with the Local Authority or a Registered Provider, subject to such an organisation's acquiescence), with the other person(s) featuring as a usual household member. Anyone who might usually reside with an Applicant, or who might reasonably be expected to reside with an Applicant, can feature as part of the application.
- 7.14.2 A usual household member is a person who primarily (for at least 50% of a month) or exclusively lives with an Applicant. People who usually live with the Applicant, but are temporarily absent due to circumstances beyond their control (e.g. they are in prison, care of a local authority, hospital, armed forces, etc), are also considered a usual household member.

7.14.3 If applicants are applying to include family members who are not living in the United Kingdom, the application may be registered but applicants cannot be nominated together until the family has been reunited in the United Kingdom.

7.15 Children in care

7.15.1 Children in compulsory or voluntary care can be included on an application subject to written confirmation from social services that the children are to live on a permanent basis with the applicant(s). Households currently undertaking fostering may be able to include foster children as part of their application. Written confirmation from social services of the fostering arrangement will be required and considered to inform the decision.

7.16 Provision / receipt of care

7.16.1 Applicants or applicant household members, who require a full-time residential carer which is evidenced by social services or a primary health care professional, may include the carer on their application. People who provide substantial long-term care to another person which requires that person to live with an applicant in order to receive the care, may include that person on their application.

7.16.2 Care needs which cannot be provided by visiting carers must be verified by social services. The care needs must be substantial, i.e. a need for personal care with basic daily activities (dressing, feeding, bathing, toileting), or an inability to live independently certified by a medical professional. It would also be expected that the Applicant or member of their household would be in receipt of Carer's Allowance and Disability Living Allowance with the highest care component.

7.17 Verification

7.17.1 Upon receiving an application, the Local Authority will:

- a) Confirm accuracy of all information provided by an Applicant. Where information is inaccurate or missing, the Local Authority will contact the Applicant notifying them of this and requesting that they provide further relevant information. Where information requires verifying by a third party (e.g. housing, health, social care or other professional), the Local Authority will contact the relevant party and seek their opinion about the Applicant's circumstances at the date of their application and how this affects their housing needs.
- b) Confirm whether an Applicant is eligible for an allocation of social rented housing.
- c) Confirm whether an Applicant satisfies the qualification criteria for this scheme:

- i. If the Applicant has applied on the grounds of being homeless or owed a homelessness duty, ascertain whether or not the Applicant has already made an application for homelessness assistance.
 - ii. If yes, subject to the Applicant's acquiescence, access the Local Authority's homelessness database for information relevant to the Applicant's application for an allocation of social rented housing.
 - iii. If no, subject to the Applicant's acquiescence, arrange for the Applicant to make an application for homelessness assistance and share any information from the Applicant's application for an allocation of social rented housing that might be relevant to their application for homelessness assistance.
- d) Confirm an Applicant's priority for an allocation.
 - e) The date the priority is awarded from (the effective date in Band)
 - f) Confirm the best interests of any children that might need to be taken account of.
 - g) Confirm whether an Applicant's circumstances warrant any discretion needing to be exercised.
 - h) Confirm what would constitute a reasonable offer of accommodation, also explaining
 - a. Affordability will be determined in accordance with the criteria set out in Appendix E.
 - b. Bedroom entitlement will be determined in accordance with the criteria set out in Appendix F
 - i) Advise them of their right to request a review of any of the above matters.

7.17.2 If an Applicant is found to have more than one housing need, the Applicant will be awarded the Band which gives the highest priority.

7.18.1 **Effective date**

7.18.2 The 'effective date' is used to prioritise between applicants within the same band. The effective date of an application will be the date that the Local Authority receives the last piece of supporting information to enable the completion of the housing assessment and accepted onto the housing register.

7.19.1 **Missing Information and incomplete applications**

7.19.1 If an Applicant does not provide all the information needed to process and assess an application, within 28 calendar days of asking for it, the Local Authority will cancel the application.

- 7.19.2 If the Applicant is unable to provide all of the information within this timescale the Applicant must contact the Housing Allocations Team to request a time extension.
- 7.19.3 The above steps will be repeated whenever the Applicant notifies the Local Authority of a change of circumstances and also at the point the Local Authority will make an offer or a nomination of social rented housing to an Applicant.

7.20.1 Application decisions

- 7.20.2 Decisions on applications will be notified in writing, regardless of whether they are adverse or successful. Additional arrangements will be made for Applicants who might have difficulty understanding the implications of the decision to be informed orally (e.g. via a telephone call or in person).
- 7.20.3 Where the notification confirms a successful decision, Applicants will also be told when realistically they might be offered a letting of social rented housing.
- 7.20.4 Unsuccessful Applicants, who have been declared not eligible for an allocation of social rented housing or disqualified from joining the Scheme, can make a new application when they believe there has been a change of circumstances.
- 7.20.5 Where the notification confirms a decision that an Applicant is ineligible for an allocation of social rented housing or disqualified from joining the Scheme, the Applicant will be given reasons for the decision based on the relevant facts of the case. They will be informed that they can make a further application whenever they believe there has been a material change to their circumstances. They will also be informed of their right to a review.
- 7.20.6 Decisions about applications made by employees of the Local Authority, will be made as per the rules set out in this Scheme. However, all such decisions will be verified via a series of random checks by a designated senior officer with responsibility for administering housing allocation functions for the Local Authority. Applicants will be asked at the point of making an application, whether they (or anyone who lives with them or might reasonably be expected to live with them) are an employee of the Local Authority. Where a person affirms on their application that they (or a usual household member) are an employee of the Local Authority, they will be notified of the process to deal with any conflicts of interest which will involve a senior officer processing the application and ensuring that it is dealt with impartially without any reference to the relevant employee. The same principle will be applied to relatives of persons who are employed by the Local Authority.

7.21.1 Change in circumstances

7.21.2 Applicants whose circumstances change (i.e. change of address / household changes once they've been accepted onto the Scheme must notify the Local Authority of such changes.

7.21.3 An Applicant will need to complete an on-line change of circumstances form. Following a change of circumstances, the Applicant will not be able to bid until the application has been reassessed.

7.21.4 Where there is a change to an Applicant's or a member of their household medical / welfare need, the Applicant will need to complete the online medical questionnaire and provide supporting documentation from a GP or medical professional.

7.21.5 Eligibility and qualification for the Scheme will be reconsidered when there is a change in circumstances, and this may change the band your application has been placed in.

7.22.1 Band changes as a result of a change of circumstance

7.22.2 If as a result of a change in circumstances an Applicant gains a higher banding preference for re-housing (e.g. they move from Band B up to Band A), their effective date will be amended to reflect the date of the change.

7.22.3 If as a result of a change in circumstances an Applicant is assessed as having the same banding preference (e.g. they remain in Band B), their effective date will remain in force.

7.22.4 If as a result of a change in circumstances an Applicant is assessed as having less banding preference (e.g. the move from Band B down to Band C), their effective date will remain in force.

7.22.5 If as a result of a change in circumstances an Applicant becomes ineligible or disqualified, then they shall cease to be a member of the Scheme.

Change in circumstances	Effective date
Gains a greater priority and be placed in a higher band	The date at which the higher band applies will be used
Be assessed as being in the same band	The original effective date will be used
Less priority due to their circumstances and be placed in a lower band	The original effective dates will be used
Become ineligible or may no longer qualify	The application will be removed from the Scheme

7.23.1 Deliberately worsening circumstances

7.23.2 If an applicant or a member of their household has done something that has deliberately made their housing circumstances worse, the Local Authority may reduce the level of priority with the application demoted to Band D for a period of 12 months from the date of the decision.

- a) Abandoned or terminated previous accommodation without securing alternative accommodation first
- b) Sold a property or given notice on a tenancy with securing alternative accommodation first
- c) Been found to have deliberately disposed of assets or capital that would have enabled them to secure suitable accommodation

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8.0 Prioritisation of applications

8.1.1 Once an housing application has been assessed it will be categorised in one of four bands according to the relevant housing need that exists.

8.1.2 Applicants will be prioritised for an allocation of social rented housing according to the following criteria:

- Bands, in the order of A to D. Band A has the highest priority and Band D the lowest.
- Where two or more Applicants might have the same priority in the same Band, then the effective date (see section 7.18.1) will be used to prioritise between applicants.

8.1.3 In determining in which band to place an Applicant, the following priorities will apply:

- a) Applicants whom the Local Authority have chosen to award an additional preference, in addition to the requirement to be afforded a reasonable preference for an allocation, will be placed in Bands A or B.
- b) Applicants whom statute stipulates must be afforded a reasonable preference, will be placed in B.

8.2. Band A

8.2.1 Band A will consist of any Applicant in the following circumstances:

1. An Applicant under-occupying a social rented home within West Northamptonshire by one or more bedrooms
2. Sudden loss of existing home as a result of a disaster
3. Need to move as home within West Northamptonshire area is subject to a compulsory purchase order or requires major works
4. An Applicant releasing an adapted West Northamptonshire Council home or Registered Provider property within the West Northants area, where the adaptations are no longer required.
5. An Applicant assessed as an urgent medical need whose condition is life threatening and / or terminal and their accommodation is a major contributory factor and re-housing is required due to detrimental effects caused by the current accommodation.
6. Planned discharge from hospital is imminent and there is no accommodation available which is reasonable to occupy

7. Victims of domestic abuse, who are homeless or owed any homelessness duty and/or have been identified as high-risk victims of domestic abuse at MARAC
8. Victims of racial harassment amounting to violence or threats of violence
9. Victims of hate crime amounting to violence or threat of violence
10. Witnesses of crime, or victims of crime, who would be at high risk of intimidation amount to violence or threats of violence

8.2.2 Band A - Criteria and additional details

1. An Applicant who is under-occupying social rented housing by one or more bedrooms, as per the criteria set out in paragraph 9.7 (Bedroom Standard). The Applicant will need to be a social rented tenant of the Local Authority or a tenant of a Registered Provider living within West Northants and are under-occupying by one or more bedrooms, and the Local Authority would be able to nominate to the resulting vacancy. The Applicant would need to be willing to move to suitable smaller accommodation. Applicants awarded this band will only be considered for properties that offer fewer bedrooms than their current accommodation.
2. Sudden loss of existing home as a result of a disaster, such as those who are required to leave their home due to fire safety concerns identified by the Fire & Rescue Service.
3. Where the Applicant needs to move because their home in WNC area is subject to a Compulsory Purchase Order or requires major works, their application date will be the date the CPO was made.
4. An Applicant releasing an adapted social or affordable rented property in West Northants Council where the adaptations are no longer required by either the Applicant or a member of the household, and the Applicant is willing to move to non-adapted accommodation. The adapted property to be released will be fully wheelchair accessible and offers level access. This band will not apply where the adaptation does not offer a realistic solution to others.
5. An Applicant is assessed as having an urgent medical need and the condition is expected to be terminal or life threatening and re-housing is required due to detrimental effects caused by present accommodation, either due to the location of the present accommodation and/or due to the physical conditions of that accommodation. A health or social care professional with direct knowledge of the Applicant's condition will be contacted by the Local Authority for an opinion of the Applicant's health and the impact on their housing needs, when evidence submitted by an Applicant requires clarification on either a point of accuracy or of the prevailing

circumstances of their condition. The Local Authority will consider whether an Applicant's needs could be met by providing aids and adaptations to the current home, to enable them to remain in their present accommodation. Please refer to Section 7.3.1 for further details.

6. The Applicant or a member of the household cannot be discharged from hospital or a rehabilitation centre because they have no accommodation, or their current accommodation has been deemed hazardous to their health and the situation cannot be rectified to enable them to continue to live there, and they have been accepted by the Local Authority as being able to sustain their own independent accommodation.
7. Victims of domestic abuse, including those who have been provided temporary protection in a refuge or other form of temporary accommodation, who are homeless or owed any homelessness duty and/or have been identified as high-risk victims of domestic abuse at a local MARAC. Domestic abuse defined as any incident or pattern of incidence of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender. The abuse can encompass, but is not limited to, psychological, physical, sexual, financial and emotional abuse.
8. Victims of racial harassment amounting to violence or threats of violence and are at significant harassment and the risk of harm
9. Victims of hate crime amounting to violence or threats of violence and are at significant threat and risk of harm due to their age disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
10. Witnesses of crime, or victims of crime, who would be at high risk of intimidation amounting to violence or significant harassment and risk of harm if they remained in their current homes.

8.3 Band B

- 8.3.1 Band B will consist of Applicants entitled to a reasonable preference for an allocation of social housing accommodation. These Applicants are defined for the purpose of this Policy as persons who are:

1. Homeless applicants owed a S189B initial duty, who are homeless and owed the S188 interim duty to accommodate having reason to believe a priority need
2. Homeless applicants owed a S193 duty
3. Homeless applicants owed a S189B relief duty, but are not owed the S188 interim accommodation duty
4. Homeless applicants threatened with homelessness and owed the S195 prevention duty
5. An Applicant who is overcrowded and requires two or more additional bedrooms
6. An Applicant occupying insanitary housing or living in unsatisfactory housing conditions
7. An Applicant where the Local Authority has a Corporate Parenting Responsibility where a young person (care leaver) who have had a duty of care accepted under the Children's Act by the Local Authority and is ready for independent living
8. An Applicant approved by the Local Authority as foster carers or to adopt, who need to move to a larger home in order to look after a child under the care of the Local Authority's children services
9. Applicants who are members of the Armed and Reserve forces
10. An Applicant who are bereaved spouses and civil partners of members of the Armed forces leaving Service Family Accommodation
11. An Applicant assessed as a High medical need or High welfare need due to detrimental effects caused by the present accommodation.
12. An Applicant that is subject to MAPPA (levels 2 and 3)
13. An Applicant that needs to move on hardship grounds

8.3.2 Band B - Criteria and additional details

1. Homeless, specifically owed the section 189B relief duty owed to all eligible persons who are homeless and owed the section 188 interim duty to accommodate due to having an apparent priority need.
2. Owed a duty under Housing Act 1996, Part 7, specifically, those who are:
 - i. Not intentionally homeless and have a priority need for accommodation, owed the section 193 main duty.
3. Homeless, as defined by Housing Act 1996, Part 7, section 175, regardless of whether they have made an application for homelessness assistance, including

those who are owed the section 189B relief duty owed to all eligible persons who are homeless, but are not owed the section 188 interim accommodation duty.

4. The Applicant is threatened with homelessness and owed a S195 Homeless Prevention duty
5. Severely overcrowded due to lacking two or more bedrooms. For the purposes of determining overcrowding, an assessment will be made against the minimum room size for licensed Houses in Multiple Occupants (for licences issued after 01st October 2018) or the UK Government's Bedroom Standard for any other type of dwelling, which allows a separate bedroom each for:
 - i. A married or cohabiting couple,
 - ii. Adult aged 21 years or more,
 - iii. Pair of adolescents aged 10-20 years of the same sex,
 - iv. Pair of children aged under 10 years regardless of sex
 - v. An adolescent aged 10-20 years paired with a child aged under 10 years of the same sex,
 - vi. An unpaired adolescent aged 10-20 years,
 - vii. An unpaired child aged under 10 years.
6. Occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions. The Environmental Protection Act 1990, Part 3 (in relation to premises which pose a statutory nuisance to the occupant), Housing Act 1985, Part 10 (relating to overcrowding) and the Housing Act 2004, relating to Category 1 Hazards will be taken account of by the Local Authority when determining an Applicant's housing conditions. The following list is intended to be illustrative and in no way prescribed or definitive:
 - i. Lacking a bathroom or kitchen, as verified by an Environmental Health Officer or equivalent.
 - ii. Lacking an inside WC, verified by an Environmental Health Officer or equivalent.
 - iii. Lacking cold or hot water supplies, electricity, gas, or adequate heating, as verified by an Environmental Health Officer or equivalent.
 - iv. Property in disrepair, this will only apply to significant hazards (Part 1 of the Housing Act 2004), where those hazard(s) cannot reasonably be removed or reduced to a satisfactory level and within a reasonable timescale, as verified by an Environmental Health Officer or equivalent.

7. An Applicant where the Local Authority has a Corporate Parenting Responsibility where a young person (care leaver) who have had a duty of care accepted under the Children's Act by the Local Authority and is ready for independent living.
8. Persons approved by the Local Authority as foster carers or to adopt, who need to move to a larger home in order to look after a child under the care of the Local Authority's children services, including those who require a larger property in order to secure a Special Guardianship order or Child Arrangement Order with respect to a looked after child or for a child that is deemed at high risk of becoming looked after otherwise.
9. Members of the Armed and Reserve Forces, such as:
 - i. Former members of the Regular Armed Forces.
 - ii. Serving members of the Regular Armed forces 6 months prior to discharge.
 - iii. Serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability (including a mental ill health condition) which is wholly or partially attributable to their service.
 - iv. Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability which is wholly or partially attributable to their service.
10. Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner, which was wholly or partially attributable to their service.
11. An Applicant who has been assessed as having a High medical and/or welfare need to move (including grounds relating to a disability), due to detrimental effects caused by present accommodation, either due to the location of the present accommodation and/or due to the physical conditions of that accommodation. A health or social care professional with direct knowledge of the Applicant's condition will be contacted by the Local Authority for an opinion of the Applicant's health and the impact on their housing needs, when evidence submitted by an Applicant requires clarification either on a point of accuracy or of the prevailing circumstances of their condition. The Local Authority will consider whether an Applicant's needs could be met by providing aids and adaptations to the current home, to enable them to remain in their present accommodation. Once accommodation is allocated to a person with medical or welfare needs, their support and care needs will be assessed jointly by social services, Children services, housing support providers, NHS Trusts, and other relevant agencies. **Please see section 7.5.7 for more information.**

12. An Applicant subject to MAPPA (level 2 and 3)
13. Hardship grounds – Needing to move to a particular locality in the district of the authority, where failure to meet this need would cause hardship (to themselves or others). The following list is intended to be illustrative and in no way prescribed or definitive:
 - i. Escaping anti-social behaviour such as harassment, alarm, distress, as result of nuisance or annoyance in relation to the occupation of their premises, or as a result of housing-related nuisance or annoyance, from a person.(having been evidenced by HASBAG, Police, community safety partnership, or other professionals)?
 - ii. Suffering from financial hardship and having difficulty in meeting their housing costs, which has been assessed and verified from either the Local Authority’s housing debt and advice team, or a recognised external organisation that carries out affordability assessments.

8.4 BAND C

8.4.1 Band C will consist of Applicants who are eligible and qualify to be allocated social rented housing via this Scheme (includes applicants who have welfare needs and this is made worse by their current accommodation, applicants sharing facilities) and social rented housing is an affordable housing option for them.

1. An Applicant who are intentionally homeless and have a priority need for accommodation owed the S190 duty
2. An Applicant overcrowded due to lacking one bedroom
3. An Applicant is a separated family due to no suitable accommodation
4. An Applicant has at least one dependent child and is living in accommodation where the facilities are shared with others
5. An Applicant assessed as a medium welfare need due to detrimental effects caused by the present accommodation
6. Take-up a particular permanent employment, education or training opportunity and in respect of Transfer Applicants, be closer to work

8.4.2 Band C – Criteria and additional details

1. Owed a duty under Housing Act 1996, Part 7, specifically those who are:

- i. Intentionally homeless and have a priority need for accommodation, owed the section 190 duty.
2. Overcrowded due to lacking one bedroom. For the purposes of determining overcrowding, an assessment will be made against the minimum room size for licensed HMOs (for licences issued after 01st October 2018) or the UK Government's Bedroom Standard for any other type of dwelling, which allows a separate bedroom each for:
 - i. A married or cohabiting couple,
 - ii. Adult aged 21 years or more,
 - iii. Pair of adolescents aged 10-20 years of the same sex,
 - iv. Pair of children aged under 10 years regardless of sex ,
 - v. An adolescent aged 10-20 years paired with a child aged under 10 years of the same sex ,
 - vi. An unpaired adolescent aged 10-20 years,
 - vii. An unpaired child aged under 10 years.
 3. An Applicant and their household who cannot live together as a family due to no suitable accommodation (Section 7.9.0)
 4. An Applicant has at least one dependent child or a pregnant women (once the pregnancy has reached 24 weeks) with a confirmed due date, sharing accommodation with their family or another household and is otherwise adequately housed.
 5. An Applicant assessed as a medium welfare need due to detrimental effects caused by the present accommodation. Please see Section 7.5.9 for further information.
 6. Take-up a particular employment, education or training opportunity and in respect of Transfer Applicants, be closer to work

8.5 BAND D

1. 1. An Applicant has refused the maximum number of suitable offers and will be demoted to a reduced priority for a period of 12 months
2. An Applicant has no housing need but establishes a local connection to a S106 or village exception site, whether the connection is to the specific village where the development is located, or within the cascading villages (as set out in the relevant legal agreements).
3. An Applicant has deliberately worsened their circumstances to gain more priority through this Scheme

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| <ol style="list-style-type: none">4. Any other applicant who is eligible and qualifies and not covered by any of the above |
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8.5.1 Band D – criteria and additional details

1. An Applicant who has exhausted their right to refuse an allocation of social rented housing and will remain in Band D for a period of 12 months from the date of final refusal.
2. An Applicant has no housing need but establishes a local connection to a S106 or village exception site, whether the connection is to the specific village where the development is located, or within the cascading villages (as set out in the relevant nomination agreement / local lettings plan). Local Connection to such sites will be verified at the point of application and at the point of nomination.
3. An Applicant has deliberately worsened their circumstances to gain more priority through this Scheme (see Section 17.7.1 for more information).
4. Any other applicant who is eligible and qualifies and not covered by any of the above.

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9.0 Making an allocation

9.1.1 Properties and advertising

9.1.2 Social rented housing properties that are due to become vacant, will be advertised through a choice based letting system and applicants will be able to place bids for properties which have been assessed as meeting their needs.

9.1.3 Adverts for properties will be created and properties will be advertised on a weekly cycle in the form of an advert, details of available properties are advertised on the website at [xxxxxx \(insert link\)](#).

9.1.4 The Local Authority, and Registered Providers will create adverts and will provide the following information whenever any dwelling is made available by the Local Authority or Registered Providers:

- a) type (e.g. house, flat, bungalow, etc), size (e.g. number of bedrooms, bathrooms, etc) and location (e.g. by electoral ward).
- b) who the landlord is
- c) how much the weekly rent is and the cost of any service or support charges
- d) if the property is a social or affordable rent
- e) type and length of tenancy
- f) floor level and whether there is a lift
- g) whether it is already accessible for people with disabilities or could be adapted to be so.
- h) whether there is access to a shared or private garden.
- i) the year the property was built, if available.
- j) whether pets are allowed
- k) an indication of the cost of running it e.g., the likely Council Tax valuation, typical charges paid for utilities, If the property is subject to a local lettings plan or a sensitive let
- l) if the property is restricted by a Planning Obligation under Section 106 of the Town and Country Planning Act 1990 and where offers of tenancies may only be made to applicants with a strong local connection to an exception site
- m) closing date of advert

9.1.5 Properties will be advertised displaying any specific criteria or restrictions on who can bid, for example if there is a restriction on age group or family size, suitable only for persons with supported or specialist needs.

9.1.6 The labelling of properties is an important part of housing allocation process, as it enables the Local Authority to set parameters on which types of households can

apply for vacancies and whether any particular types of households will be given preference over other when being considered for specific vacancies.

- 9.1.7 Labelling should generally be as inclusive as possible, to maximise choice, whilst allowing preference to be given to certain household types to make the best use of stock, meet local priorities and giving as much choice as possible to help create sustainable communities.

9.2.1 Bidding for a property

- 9.2.2 Applicants are required to bid for a property if they want to be considered for it and may bid for a maximum of up to three properties per week. This does not guarantee that they will be offered any property they might make a bid for.
- 9.2.3 It is important that applicants are able to access the Local Authority's Choice Based Lettings Scheme and that relevant support is provided where appropriate. Applicants are encouraged to self-identify if they require support in the bidding process, where assistance would enhance successful bids and they would otherwise not be able to participate fully in the scheme. The Local Authority will also identify and support any Applicants who may have a difficulty in expressing a preference. The Local Authority will use its own judgement on initial contact with an Applicant, based on whether they need assistance to complete an application.
- 9.2.4 Applicants are expected to place bids regularly. Applicants who are not making bids will be contacted to determine if this is due to them having difficulties. Particular attention will be paid to ensuring those who are homeless, have a disability or are from an ethnic minority group, are provided with any support they might need to make bids. If bids are not placed with a six-month period and suitable properties have been advertised during this time, the Applicants will be contacted to assess the reason. Applicants who fail to respond may be removed from the Scheme.
- 9.2.5 Applicants accepted as homeless, including those applicants living in temporary accommodation and the Local Authority has a statutory duty to them under homelessness legislation, need to secure housing urgently. It is therefore expected that Applicants to be actively bidding on advertised vacancies.

9.2.6 Homeless applicants are therefore expected to check the adverts each week and apply each week for vacancies which are suitable for their household in terms of size and type. If an Applicant has not utilized all of their available bids at the end of a bidding cycle and the Housing Solutions Team consider that an advertised property is suitable, they may place a bid on behalf of the applicant or reduce prioritisation by lowering the applicant's band.

9.3.1 Autobid

9.3.2 In some cases, the systems software that the Local Authority uses, will place bids on an applicant's behalf. The system places bids on suitable properties which provide the best possible chance of nomination.

9.3.3 Direct offers

9.3.4 In some circumstances, the Local Authority will not advertise available properties, instead a direct offer of accommodation may be made to an applicant. Any direct offer will constitute a formal and suitable offer, and if refused will be subject to the same rules for the number of offers as set out in section 9.9.1. Decisions regarding direct offers will be agreed by a Senior Housing Officer within the Housing Team.

9.3.5 Illustrative examples of direct offers are as follows, this list is not exhaustive:

- a) hard to let properties where no suitable bids have been received
- b) where the local authority makes a direct offer by way of discharging a housing duty;
- c) where a direct offer is made to an applicant for an adapted property following an assessment by Social Care and Occupational Therapy
- d) where an allocation is required to ensure protection of the public for example following a decision made by a Multi-Agency Public Protection Arrangements Meeting (MAPPA)
- e) where an applicant has been referred as subject to the Witness Protection & Anonymity Orders
- f) where the local authority considers it necessary to suspend choice-based lettings for a period of time, for example due to a public health emergency or another similarly significant event. Such decisions will be taken by the Senior Housing Management Team
- g) any other circumstance that enables the Council to make best use of housing stock and /or respond to emerging local housing needs

9.4.1 Shortlisting of applications

9.4.2 Once the bidding cycle for the advertisement is closed, all bids will be shortlisted according to the banding criteria and any qualifying letting criteria or property criteria specified on the property advert.

9.4.3 An offer of accommodation will be considered reasonable if the property being offered will meet the housing needs of an Applicant, having had regard to the following matters at the date when the offer is made:

- a) Whether the Applicant and their household would be overcrowded or under-occupying. As a general rule, allocations will be made so that a property is fully occupied. If this is not possible, under-occupation will be considered, subject to an affordability assessment
- b) Affordability of the property when compared to the Applicants' income and expenditure, see Appendix B for the methodology that will be followed to determine whether a property is affordable
- c) Location of the property in regard to essential journeys the Applicant needs to make
- d) Public sector equality duty in Equality Act 2010, section 149
- e) When there is a child or children in the Applicant's household, the duty to safeguard and promote the welfare of children in the Children Act 2002, section 11
- f) In respect of school-age children, the duty in the Human Rights Act 1989, that no person should be denied the right to an education (Notwithstanding this, an offer of accommodation might necessitate a child having to move school).
- g) Space and arrangement of the property (e.g. whether the Applicant and usual household members could access the property and suitably move around inside and use all of its features, in particular taking account of any medical and/or physical needs).
- h) The general condition of the property (e.g. that it is in a reasonable state of repair, there are suitable fire safety and carbon monoxide precautions and a current gas safety record, the property is free from damp and mould growth, there is reasonable hygiene, sanitation and water supply, etc).
- i) The specific health needs of the Applicant or their usual household members
- j) The proximity and accessibility of family support
- k) The proximity and accessibility of medical facilities and other support services which are currently used by or provided to the Applicant or the usual family members that are essential to that persons' wellbeing
- l) The proximity of alleged perpetrators or victims of domestic abuse, or other types of abuse or harassment

9.4.4 Instances when an Applicant who requires adaptations who is offered a property, that is subsequently deemed to be unable to be adapted, or where existing adaptation are not appropriate for an Applicant's needs, will not be deemed as a refusal.

9.4.5 The Local Authority will publish feedback on the outcomes of allocations made. Requests for this information to be provided in alternative formats will be considered on an individual basis.

9.4.6 If an Applicant is shortlisted for two properties on the same day, they will be asked to choose which property they wish to be offered/nominated to. Once the Applicant has made this decision, the other property will be offered to the next applicant on the shortlist.

9.5.1 Bypassing an Applicant for an offer

9.5.1 In some situations a property will not be offered to the highest ranked applicant who has expressed a preference for it. Shortlisted Applicants may be bypassed for a number of reasons.

9.5.2 The list below provides a general guide to the possible reasons for bypassing an applicant, however this is not exhaustive, and each case will be assessed individually.

- a) If an applicant bids for a property and their household details do not match the household criteria set out in the advert;
- b) If an applicant bids for a property that does not meet their specified medical / welfare needs;
- c) If the property is adapted and the applicant does not need those specific adaptations
- d) If the property is not adapted and the applicants needs specific adaptations, based on their medical / welfare assessment;
- e) If the reason for the move is domestic abuse, racial abuse, hate crimes etc and the move is not considered to be far enough from the area to resolve the issues;
- f) If the property advertised is through a Local Lettings Plan and the Applicant's household details do not match the household criteria set out in the advert.

9.6.1 Pre nomination / offer Verification

9.6.2 Before an offer or nomination is made the Local Authority will contact the Applicant to check that their circumstances have not changed, and that the Applicant would still be entitled to be considered for the property. Applicants will be expected to provide up to date original documentation.

9.6.3 If the Local Authority assess that the Applicants circumstances have changed and this would mean that the applicant's band should be reduced, or the Applicant's effective date in band be changed, then the Applicants will not be offered the property. If the Applicant has moved and has not provided an update on their circumstances, then the property will not be offered.

9.6.4 If it is not possible to complete the verification, or the Applicant does not provide the required information the bid will be overlooked, and the property will be offered to the next applicant on the shortlist.

9.7 Bedroom standard

9.7.1 One bedroom will be allocated to each of the following, (this includes students and members of the armed forces or reserve forces if they're away and intend to return home):

- A. A married couple, cohabiting couple or single parent
- B. Adult aged 21 years or more
- C. Pair of adolescents aged 10-20 years of the same sex
- D. Pair of children aged under 10 years regardless of sex
- E. An adolescent aged 10-20 years paired with a child aged under 10 years of the same sex
- F. An unpaired adolescent aged under 21 years
- G. An unpaired child aged under 10 years
- H. A household member who cannot share due to a disability or medical condition, or due to fostering arrangements being facilitated by the Local Authority.
- I. An overnight carer for any usual household member, if the carer isn't a usual household member.
- J. Approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
- K. A new approved adopter or foster carer for up to 52 weeks of approval if no child has been placed with the Applicant's household during that time.
- L. Households with an expected mother are treated as though the child has been born once the pregnancy has reached 24 weeks. Confirmation of the pregnancy and expected date of delivery such as the Pregnancy Maternity Certificate (MATB1) or GP/Midwife letter is required.

9.7.2 This standard is then compared with the number of bedrooms available for the sole use of the household. Appendix F provides further details on how the Local Authority will determine an Applicants entitlement to bedrooms.

9.7.3 Due to the shortage of larger properties, Applicants who are eligible for four-bedroom properties may also be considered for larger three-bedroom properties, for example, a three-bedroom property with two separate living rooms where one room can be considered to be used as a bedroom. Unless the property has a though kitchen/lounge or kitchen/diner and only one other separate living room. In considering the use of room which could be used as a bedroom, regard will be given to whether the room has a fixed heating appliance with exposed flame which would make it unsuitable for use as a bedroom.

9.8.1 An offer/nomination of accommodation

9.8.2 Following an offer or nomination by the Local Authority to an Applicant, the Local Authority will notify the landlord of the property, of the Applicant meeting the criteria and provide their application for consideration.

9.8.3 The Registered Provider may ask for additional documentation and reserve the right to carry out pre-tenancy checks.

9.8.4 Applicants will be given a reasonable period to properly consider whether to accept a property. This will typically be 24 hours following a viewing, however, the personal circumstances of each Applicant, including those who are vulnerable Applicants, unfamiliar with the property being offered, in hospital, require a support worker to be present at the viewing, are working, or have childcare commitments will be given longer to consider the property offered. Any longer timescale will be based on the specific circumstances of an Applicant. The actual letting will be handled by Northamptonshire Partnership Homes or a Registered Provider, who will complete the letting following the offer and acceptance of a tenancy agreement by the Applicant.

9.8.5 Applicants will be provided with an opportunity to view the property prior to accepting or rejecting the dwelling being offered. Applicants can expect properties to be fit for occupation at the date of the letting, or that any repairing obligations imposed on a registered provider, will be met within a reasonable time of commencement of the tenancy.

9.8.6 Applicants will not be offered an allocation that at the date an allocation or nomination is made, would result in them under-occupying the dwelling (as per the definition used by the Department of Work and Pensions to determine claims for help with housing costs), being overcrowded (as per the United Kingdom Government's Bedroom Standard) or being unable to afford housing costs (including rental charge and any service charges), reasonable living expenses equal to universal credit standard

allowances, relevant expenditure to nurture and keep safe any child that lives in the household, and any priority debts.

- 9.8.7 As a general rule, allocations will be made so that a property is fully occupied. If this is not possible, under-occupation will be considered subject to an affordability assessment.
- 9.8.8 Applicants who receive support from a carer who does not live with them and who is required to stay overnight, and meets the requirements as set out in Section 7.11, will have their need for a spare room taken account of whenever possible.
- 9.8.9 Properties on the ground floor, with an accessible bathroom will be offered to Applicants who have a medical need for such a dwelling over an Applicant who has no need for such accommodation.
- 9.8.10 Any particular needs of older Applicants will be taken account of. A health or social care professional with direct knowledge of the Applicant's condition will be contacted by the Local Authority for an opinion of the Applicant's health and the impact on their housing needs when evidence, submitted by an Applicant, requires clarification either on a point of accuracy or of the prevailing circumstances of their condition. The needs of Applicants who have been approved by the Local Authority to adopt or foster and require a larger property will be taken account of. The extent and circumstances of an Applicant's household will be taken account of, as to whether they would be eligible or qualify in their own right or not.
- 9.8.11 Applicants will not be made an offer of a property in an electoral ward in which they have previously been the perpetrator or victim of anti-social behaviour, hate crime, violence or domestic abuse, or where the perpetrator or victim now currently lives.
- 9.8.12 Applicants will be informed when an offer is made whether the property will be furnished or unfurnished.

9.9.1 Number of offers

- 9.9.2 To ensure applicants only bid for properties in which they are genuinely interested, and in order to be fair as possible to all Applicants, the number of offers an applicant can refuse is limited.
- 9.9.3 All Applicants are entitled to **two** refusals of a reasonable offer of accommodation, except for the following exceptions:

- i. Homeless applicants to whom the authority has accepted a S193 main duty to accommodate will only receive only refusal of a reasonable offer of accommodation. After the first refusal, the 2nd nomination/offer will be through a direct match
 - ii. Homeless applicants to whom the authority has accepted a S188 duty to accommodate will only receive only refusal of a reasonable offer of accommodation. After the first refusal, the 2nd nomination/offer will be through a direct match
 - iii. Applicants who are subject to MAPPA are entitled to one reasonable offer to accommodation, this will be through a direct matching.
- 9.9.4 Once an Applicant has exhausted the applicable refusal threshold, if the Applicant refuses a final suitable offer, they will be given reduced preference for a period of 12 months.
- 9.9.5 When an offer is refused, an assessment will be made as to whether this was a suitable offer. The Local Authority will consider the circumstances of each refusal on a case-by-case basis and confirm with an Applicant they are refusing an offer prior to imposing a sanction.

9.10.1 Register Provider / Landlord refusal

- 9.10.2 In some circumstances Registered Providers / Landlords may refuse to offer a tenancy to a nominated Applicant in accordance with their own policies. They carry out their own verification processes and they may refuse to accept an Applicant as a tenant if they do not meet the guidelines set out in their own policies. The Registered Provider/Landlord may also prevent an offer going ahead where the property is not considered suitable for the Applicant or a member of their household. This may include issues of public safety, risk or sustainability of the tenancy.
- 9.10.3 If a Registered Provider/Landlord rejects an Applicant, they will inform the Applicant in writing how they reached the decision and if the Applicant wishes this to be reviewed, the Applicant or their representative must make a written request directly to the Landlord concerned within 21 days of the decision. If the Local Authority does not agree with the decision of the Registered Provider/Landlord, we will negotiate with them, however if the negotiation is unsuccessful, then the Local Authority will have to move to the next Applicant on the shortlist.

9.11.1 Local Lettings

9.11.2 The Local Authority will use local lettings schemes to achieve a wide variety of housing management and policy objectives subject to agreement with the Local Authority. The following list is intended to be illustrative and in no way prescribed or definitive. The Council is under no obligation to instigate a local lettings scheme for any of the examples listed below:

- a) Allocating accommodation in rural villages and giving priority to Applicants with a connection to a particular parish
- b) Creating more mixed and/or sustainable communities.
- c) Dealing with a concentration of deprivation.
- d) Ensuring properties that are particularly suited to being made accessible (e.g. ground floor flats) are prioritised for those with access needs.
- e) Relocating essential workers such as teachers, nurses and police officers within a reasonable travelling distance from their work.
- f) Supporting people in work/volunteering or who are seeking work or seeking volunteering opportunities.
- g) Dealing sensitively with lettings in rural areas to sustain communities by giving priority to those with a local connection of more than two years.
- h) Where a child to adult ratio could be lowered on an estate where there is high child density or, conversely, young single people could integrate into an estate where there is high ratio of older persons.
- i) Where there are reasons to positively discriminate due to age, for example accommodation is only suitable for Applicants under the age of 35 years, or over the age of state pension entitlement.

9.11.3 Upon identification of particular types, clusters or locations of housing for particular types of Applicants, a local lettings scheme will be used to deal with letting those homes. Local letting schemes will have clear evidence of need for the approach being taken. Any local lettings scheme will not dominate the Scheme and will overall give a reasonable preference to those in Band A and Band B over Applicants in Band C or Band D. To adopt a local lettings scheme, evidence will be submitted for approval by the Housing Solutions Service Manager prior to any local letting scheme being put into force. Any local lettings scheme adopted will set out the following:

- a) A clear definition of the objective(s) to be achieved, backed up by evidence.
- b) A method which is likely to achieve the objective(s).
- c) An equality impact assessment.
- d) How the scheme will be monitored and who will be involved.
- e) Mechanisms of reporting and reviewing the scheme.

- f) How the views of local communities have shaped the scheme (e.g. with people who are on the electoral register as being resident in an electoral ward(s), where a local letting scheme is being proposed. Their view will not be treated as an overriding factor in decision making).
- g) The circumstances in which the local lettings scheme will be reviewed or will come to an end.

9.11.4 Local lettings schemes will be adopted to set aside:

- a) A portion of properties for letting of new build properties for the first time, to be determined in accordance with the Local Authority's Local Plan.
- b) A portion of properties, to be determined annually (from date of adopting this Scheme) by the Local Authority, for former members of the Armed Forces based on the number of applications made by and allocations made to former members of the Armed Forces during the preceding 12 months.
- c) A portion of properties, to be determined annually (from date of adopting this Scheme) by the Local Authority, for households in types of employment where skills are in short supply.
- d) A portion of properties, to be determined annually (from date of adopting this Scheme) by the Local Authority, for prospective and approved foster carers and adopters (endorsed by the Local Authority), so it can satisfy its duty under Children Act 1989, section 22G to ensure there is sufficient accommodation available to the needs of looked after children, based on intelligence provided by the Local Authority's Children Services.
- e) A portion of properties, to be determined annually (from date of adopting this Scheme) by the Local Authority, a minimum of which is one percent (1%) of all properties allocated, to Transfer Applicants who need to move for work related reasons, based on the number of applications made by and allocations made to Transfer Applicants who need to move for work related reasons, during the preceding 12 months.

9.11.5 A local lettings scheme will be adopted for specific types of accommodation which provide with linked support services for:

- a) Older persons applying for accommodation at an Extra Care Scheme or sheltered housing. A joint assessment of the Applicant's housing, care and support needs will be undertaken by the Local Authority's housing and adult social care departments, subject to consent from the Applicant.
- b) Single parents aged 16/17 years, who are not living with their parents. A joint assessment of the Applicant's housing, care and support needs will be undertaken by the Local Authority's housing and children services departments, subject to consent from the Applicant.

- c) Rough sleepers and people at risk of rough sleeping. An assessment of housing and support needs will be undertaken by the Local Authority housing department, adult social care department, or an organization commissioned by the Local Authority to provide support to people sleeping rough or at risk of rough sleeping.
- d) Sex offenders. A joint assessment will be undertaken by the local Police Service, National Probation Service, the Local Authority's adult social care department, health professionals and other bodies to manage risk to the community.

9.11.6 A local letting scheme will be adopted for displaced agricultural workers, where they have been displaced due to a need to accommodate another agricultural worker and the farmer cannot provide suitable alternative accommodation for the displaced worker and needs to be rehoused in the interest of efficient agriculture.

9.12.1 Discretion

9.12.2 Discretion about qualification, choice, prioritisation (banding) or being allocated social rented housing will be exercised by the Local Authority only in limited individual cases where there are exceptional circumstances as defined below:

- a) Providing protection to people who need to move away from another area, to escape violence, harm, or intimidation.
- b) Enabling those who need support to rehabilitate and integrate back into the community.

9.12.3 Discretion about qualification, choice, prioritisation (banding) or being allocated social rented housing will be exercised by the Local Authority only in limited individual cases, where an applicant (or a member of their household or someone who might usually be expected to live with them) needs to move due to:

- A. Multi-Agency Risk Assessment Conference (MARAC).
- B. Multi-Agency Public Protection Arrangements (MAPPA).
- C. Action being taken as a result of adult or child safeguarding concerns.

9.12.4 When assessing whether discretion should be applied, the Local Authority will consider:

- A. All the circumstances of the Applicant, including whether they would usually qualify to join the Scheme, the degree of choice they would be entitled to, the degree of prioritisation they would be entitled to and the type of social housing they might be allocated, if no discretion was applied.
- B. What the exceptional circumstances are. They should be unusual or remarkable circumstances which indicate that the Applicant's housing needs are more urgent than other Applicants.

- C. What will be the consequences if no discretion is exercised. This will include considering how serious the potential consequences are and how likely each potential consequence is.

9.12.5 When deciding, the Local Authority will have regard to:

- A. The fact that decisions to exercise discretion will be kept to minimum.
- B. The need for consistency with previous decisions regarding exercising discretion.
- C. What would be a fair outcome to ensure that there is no discrimination.
- D. The likelihood and severity of the potential consequences of discretion not being exercised.

9.12.6 A decision as to whether or not to exercise discretion will be made at the point of receipt of application and again at the point of offer.

9.12.7 This Scheme and the administration of it, will be the principal way to allocate housing for the purpose of the Local Authority entering into secure or fixed-term tenancies (let at social rent or affordable rent and can include a probationary period) with Applicants, or making a nomination for a Registered Provider to enter into an assured shorthold or an assured tenancy with Applicants.

9.12.8 Decisions concerning Applicants who are granted a fixed-term tenancy and whether to grant a further fixed-term are outside the scope of the Scheme. Applicants whose fixed term expires and a further tenancy is not granted will be entitled to make an application to join this Scheme. Decisions about whether they are eligible or qualify to join this Scheme will be made consistent with all other Applicants. Information about the types of tenancies the council offers and how it can be found in the following documents:

1. West Northamptonshire Tenancy Strategy [insert hyper-link]
2. West Northamptonshire Tenancy Policy [insert hyper-link]

10.0 An Applicants Right to a Review

10.1 Applicants will be informed of their right to request a review of any of the decisions shown below within 21 calendar days of receiving a decision about their housing application:

- i. That an Applicant is not eligible for an allocation, due to being subject to immigration control or being an ineligible person from abroad.
- ii. That an Applicant is not within a class of persons qualifying to join the Scheme.
- iii. The degree of preference an Applicant has been afforded under the Scheme, including any changes made to the degree of preference they are entitled to.
- iv. The facts of an Applicant's case which are likely to be, or have been, taken account of when deciding whether to make an allocation or a nomination to a Registered Provider, including their medical condition or other welfare needs.
- v. The type of social rented housing for which an Applicant will be considered under the Scheme.
- vi. The extent of an Applicant's household.
- vii. Whether an allocation or a nomination constitutes a final offer with the terms of this Scheme.

10.2 Applicants must request a review in writing and can provide supporting evidence at that time. Reviews will be accepted:

By email: xxxxx

In writing to: xxxxxxx

10.3 The review will be a re-consideration of all the relevant facts and the legal requirements at the date the review is carried out. Upon receipt of a review request from an Applicant, the Local Authority will complete the review within eight weeks (56 days). This timeframe can be extended by mutual agreement between the Local Authority and the Applicant. The review will be carried out by the Allocations Manager, who will not have previously been involved in making the original decision. An Applicant will not usually be entitled to an oral hearing. However, when the Local Authority deem an oral hearing helpful to determine the facts of the case, an Applicant will be entitled to have an advocate present.

10.4 If the Local Authority concludes that there was a deficiency or irregularity in the original decision, or in the manner in which it was made, but is minded to decide against the interests of the Applicant anyway, the Local Authority shall notify the Applicant of their intentions and the reasons for them. The Applicant and/or their advocate may then, within a reasonable period of time, make oral and/or written representations to the Local Authority.

- 10.5 Notification of all review decisions, including reasons for decisions made, will be made in writing.
- 10.6 Applicants will be informed of their right to pursue a judicial review. This includes a refusal to take an application to join the Scheme. If Applicants are dissatisfied with how their application and any subsequent complaint has been handled by the Local Authority, they will be informed of their right to make a claim of maladministration to the Local Government & Social Care Ombudsman or the Housing Ombudsman.

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11.0 Information about this Scheme

- 11.1 The Local Authority will provide a copy of this Scheme to any person who requests one, irrespective of whether they intend to make an application or not. A summary version of this Scheme is also available. Electronic copies will be provided, copies in alternative formats will be considered on an individual basis. A copy of this Scheme is available on the Local Authority's website [\[insert hyperlink\]](#)
- 11.2 Copies of this Scheme can be requested by:
- a) In person [insert office address to which customer can visit in person].
 - b) In writing [insert postal address if different from above].
 - c) On the phone [insert telephone number].
 - d) By email [insert email address]
 - e) Online [insert website hyperlink, which contains all of the above].
- 11.3 Prior to adopting this Scheme, the Local Authority carried out consultation on how it intended to prioritise allocations. Applicants who were members of the Scheme in force at that time and other people, such as advocates for people who have protected characteristics, as the Local Authority deemed appropriate were consulted before finalising this Scheme. Any major changes to this Scheme that will affect the relative priority of a large number of Applicants who were members of the previous Scheme, have been communicated in writing.
- 11.4 When formulating this Scheme, a variety of consultation methods, such as focus groups and online surveys, were used to solicit opinions from interested and relevant parties. The Local Authority took account of the needs of specific groups, such as persons with a disability, or learning and support needs. The Local Authority has published a report on the consultation of this Scheme, on the outcomes of the consultation and changes that have been made to the Scheme.
- 11.5 This Scheme will be reviewed by the Local Authority at least every two years (and more often if required, for example due to legislative or regulatory changes) in conjunction with Applicants and other appropriate persons or organisations.
- 11.6 Should any further amendments be made to this Scheme, the Local Authority will take such steps as it considers reasonable, within a reasonable period of time, to bring to the attention of those likely to be affected by:
- a) any subsequent alteration to this Scheme that would affect the relative priority of a large number of Applicants; and
 - b) any significant alteration to any associated procedures for administering this Scheme.

- 11.7 Minor changes will be agreed by Senior officers in consultation with the Portfolio Holder for Housing and Communities. This will assist in ensuring that the Scheme continues to meet legislative and best practice requirement and changes that may involve clarification on wording etc.
- 11.8 If any changes relate to a major change of policy which significantly impacts on any single group, the Council will comply with the procedures as set out in part VI of the Housing Act 1996 and the Scheme should be referred to Cabinet for approval and the possibility of consultation.
- 11.9 **Co-operation with Registered Providers**
- 11.10 Arrangements for nominating Applicants for homes owned by Registered Providers, set down in an agreement [\[insert hyper-link\]](#) prescribe the portion of lettings that Registered Providers will make available to the Local Authority. The agreement also has a criterion for how Registered Providers can accept or reject a nomination and describes how any disagreements between the Local Authority and Registered Providers about nominations will be resolved .
- 11.11. A system has been adopted to monitor the effectiveness of the nominations agreements, to allow the Local Authority to be satisfied that it is fulfilling its legal obligations to allocate social rented housing. An annual report on nominations agreements will be presented to elected councillors of the Local Authority and will be shared with Registered Providers who have entered into a nomination agreement with the Local Authority.
- 11.12 The Local Authority and Registered Providers have agreed an information sharing protocol that accords with the General Data Protection Regulation and Data Protection Act 2018. The Local Authority will require written consent from an Applicant to share their information with a Registered Provider.
- 11.13 Applicants will be informed of their rights to make a complaint to a Registered Provider about a decision to reject a nomination. The methods by which complaints can be made are set out in the housing allocation rules and policies published by each Registered Provider. Applicants that have a dispute about the housing allocation rules and policies of Registered Providers, and how these affect any nomination made, will be informed of their right to make a complaint directly to the organisation and if still dissatisfied after their complaint has been investigated, to the Housing Ombudsman. Applicants will also be informed of their right to seek judicial review on any point of law of a Registered Provider's decision to reject a nomination. Additionally, Applicants

who consider that there has been unlawful discrimination or infringement of human rights will be informed by the Local Authority of their right to seek assistance from the Equality and Human Rights Commission.

11.14 Fraud

11.15 Every Applicant will be provided with advice about offences in relation to applications, prior to making an application. Applicants will be disqualified, and might be prosecuted, if they deliberately withhold information, provide misleading information, or do not notify the Local Authority of any change in circumstances (e.g. change in income, change in household formation). A warning will include the following facts: a person guilty of such an offence could be liable to pay a fine (with no maximum) and may also face prosecution for fraud which can result in imprisonment.

11.16 Other matters

11.17 A copy of this Scheme has been sent to the Regulator of Social Housing and the Local Government & Social Care Ombudsman.

11.18 The Local Authority is permitted to contract out the administration of specific public law housing allocation functions to a third party. Any such arrangements that might be in force are outside the scope of this Scheme. Where such arrangements have been established, any reference made in this Scheme to the Local Authority automatically extends to any third party appointed to undertake such administration.

Appendix A: Legislative framework

- A.1 This Scheme has been formulated with regard to the law and regulatory requirements, including:
- a) Housing Act 1985
 - b) Housing Act 1996
 - c) Homelessness Act 2002
 - d) Housing and Regeneration Act 2008
 - e) Localism Act 2011
 - f) Armed Forces Act 2006
 - g) Asylum and Immigration Act 1996
 - h) Immigration and Asylum Act 1999
 - i) Children Act 2004
 - j) Equality Act 2010
 - k) Data Protection Act 2018
 - l) European Union (Withdrawal Agreement) Act 2020
 - m) Statutory guidance:
 - i. Allocation of accommodation: guidance for local authorities, December 2020, updated January 2023
 - ii. Providing social housing for local people, December 2013
 - iii. Right to Move and social housing allocations, March 2015
 - iv. Improving access to social housing for victims of domestic abuse, November 2018, updated January 2022
 - v. Improving access to social housing for members of the Armed Forces, June 2020
 - n) The regulatory standards for registered providers of social housing in England:
 - i. Tenancy Standard, published April 2012
- A.2. Case law from the English and Welsh Courts has also been taken into consideration.
- A.3. An equality duty is imposed on the Local Authority by the Equality Act 2010, section 149 (the “Public Sector Equality Duty”). Regard has been had to this public-sector equality duty and to the equality objectives that it sets out when formulating this Scheme and it will inform decision-making on individual cases so far as the law requires. Allocations of social rented housing will be monitored to determine whether equal opportunities obligations are being met, to identify any negative impact on people with protected characteristics. A plan will be adopted to mitigate any negative impacts.
- A.4. This Scheme intends to always ensure that non-discriminatory decisions will be made about the allocation of social rented housing. Regard has been had to advice on

allocating housing to disabled people published by the Equality and Human Rights Commission, along with other associated research and guides that are available.

- A.5. When formulating this Scheme, an equality impact assessment was undertaken to avoid discrimination and to demonstrate compliance with the public-sector equality duty. Particular attention has been paid to the housing needs of refugees, Gypsies and Travellers, people with disabilities, older people, people with mental health problems, and people who identify as lesbian, gay, bisexual or transgender. Any substantial variation to this Scheme will also be subject to an equality impact assessment. For further information, please see *the Scheme's Equality Impact Assessment* [\[insert hyper-link\]](#).
- A.6. This Scheme has been formulated to ensure compliance with the Human Rights Act 1998, the Equality Act 2010 and the European Convention on Human Rights Article 14 and regard has been had to the advice and guidance published by the Equality and Human Rights Commission for social housing providers on housing discrimination. The administration of the Procedure will be undertaken in a non-discriminatory manner so not to treat any person directly or indirectly less favourably than others because of a protected characteristic, with particular attention being paid to people with a disability.
- A.7. When drawing up this Scheme, the Local Authority has taken account of the objectives of its Homelessness and Rough Sleeping Strategy and Tenancy Strategy.
- A.8. The Local Authority will provide regular, accurate and generalised information on how the Scheme is managed, to actively dispel any misconceptions arising about the allocation of social rented housing and immigration, including data on nationality and immigration status, to strengthen public confidence in the Scheme.
- A.9. Applicants will be informed of their right to seek assistance from the Equality and Human Rights Commission, if they believe the Local Authority has breached the Human Rights Act 1998, by contravening their human rights or unlawfully discriminating against them.
- A.10. When formulating this Scheme, the Local Authority has considered and taken full account of the need to safeguard and promote the welfare of children, in accordance with the Children Act 2004, section 11.
- A.11. This Scheme and the administration of it will accord with the objectives and actions set out in the Local Authority's joint working protocol agreed between its Housing Services and Children Services.

- A.12 When making decisions about individual applications for an allocation of social rented housing, the best interests of any children involved will be treated as a primary (but not overriding) consideration. Active involvement from the Local Authority's Children Services department will be sought when making decisions about housing allocations where there is involvement with an Applicant or a usual member of their household with the Local Authority's Children Services. If there is some uncertainty about whether an Applicant should qualify specifically due to matters relating to services' duties, the Children Services team will be consulted.

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Appendix B – Registered Providers which own stock in the Local Authority area

B.1. The Local Authority has copies of the rules and policies for allocating social rented housing for the following Registered Providers, which all own and/or manage stock in the Local Authority area. Applicants can request a copy of such rules and policies from the Local Authority or directly from any of the Registered Providers listed below.

- 1 Accent Housing Limited
- 2 Advance Housing and Support Limited
- 3 Anchor Hanover Group
- 4 bpha Limited
- 5 Bromford Housing Association Limited
- 6 Catalyst Housing Limited
- 7 Clarion Housing Association Limited
- 8 Derwent Housing Association Limited
- 9 Dimensions (UK) Limited
- 10 EMH Housing and Regeneration Limited
- 11 Fairhive Homes Limited
- 12 Futures Homescape Limited
- 13 Futures Homeway Limited
- 14 Grand Union Housing Group Limited
- 15 Greatwell Homes Limited
- 16 GreenSquareAccord Limited
- 17 Heylo Housing Registered Provider Limited
- 18 Housing 21
- 19 Hyde Housing Association Limited
- 20 Inclusion Housing Community Interest Company
- 21 Langley House Trust
- 22 Legal & General Affordable Homes Limited
- 23 London & Quadrant Housing Trust
- 24 Longhurst Group Limited
- 25 Metropolitan Housing Trust Limited
- 26 Midland Heart Limited
- 27 Muir Group Housing Association Limited
- 28 Northamptonshire Rural Housing Association Limited
- 29 Nottingham Community Housing Association Limited
- 30 Optivo
- 31 Orbit Group Limited
- 32 Orbit Housing Association Limited
- 33 Paragon Asra Housing Limited

- 34 Places for People Homes Limited
- 35 Places for People Living+ Limited
- 36 Platform Housing Limited
- 37 Reside Housing Association Limited
- 38 Sage Housing Limited
- 39 Sage Rented Limited
- 40 Sanctuary Housing Association
- 41 Stonewater (2) Limited
- 42 Stonewater Limited
- 43 The Abbeyfield Society
- 44 The Guinness Partnership Limited
- 45 The Riverside Group Limited
- 46 Trinity Housing Association Limited
- 47 Westmoreland Supported Housing Limited

- B2. Information on the number of properties owned and managed by each Registered Provider shown above and how to contact them, can be found on the Local Authority's website [\[insert hyper-link\]](#).

Appendix C: Participating Registered Providers

- C.1 *The following Registered Providers have chosen to enter into a common housing allocation scheme, whereby they will share with the Local Authority a common database of applicants and/or a common housing allocation policy.*
- A. *Registered Providers that hold a common database of applicants with the Local Authority*
 - i. *[to be confirmed]*
 - B. *Registered Providers that hold a common housing allocation policy with the Local Authority*
 - i. *[to be confirmed]*
 - C. *Registered Providers that hold a common database of applicants and a common housing allocation policy with the Local Authority*
 - i. *[to be confirmed]*
- C.2 *Other Registered Providers that own and manage stock in the West Northamptonshire area, have chosen to not join the Local Authority in a common housing allocation scheme. They publish their own rules and policies about how they will allocate social rented housing. Copies of such documents are available directly from the relevant Registered Providers. The Local Authority holds copies of housing allocation rules and policies, for Registered Providers that own or manage stock in the Local Authority area (See Appendix A for a list of Registered Providers who own or manage stock in the Local Authority area).*

Appendix D - Cases where provisions about allocations do not apply

D.1 *There will not have been an allocation in any of the following cases. The Local Authority and/or Registered Providers shall have their own rules and policies for these matters, which should be referenced for further details:*

- a) *The granting of a tenancy that is not of the type specified in the legal definition of allocation, such as one without security of tenure (e.g. a 'family intervention tenancy', temporary accommodation provided to homeless households that are owed a duty of assistance, etc).*
- b) *Granting a tenancy to a person who is currently and lawfully occupying a property held on a family intervention tenancy.*
- c) *The vesting (by succession) of a periodic secure or introductory tenancy on the death of the current tenant.*
- d) *The devolution of a fixed term secure tenancy on the death of a tenant.*
- e) *The assignment of a secure tenancy as part of a mutual exchange.*
- f) *The assignment of a secure or introductory tenancy to a person who would have been qualified to succeed to the tenancy on a tenant's death.*
- g) *The vesting or disposal of a secure or introductory tenancy pursuant to a court order made under the following provisions of family law statutes:*
 - a. *section 24 of the Matrimonial Causes Act 1973 (property adjustment orders in connection with matrimonial proceedings);*
 - b. *section 71 of the Matrimonial and Family Proceedings Act 1984 (property adjustment orders after overseas divorce);*
 - c. *paragraph 1 of schedule 1 of the Children Act 1989 (orders for financial relief against parents); and*
 - d. *schedule 7, Part 2 of the Family Law Act 1996 (orders for moving a tenancy from an existing tenant to a new tenant).*
- h) *The vesting or disposal of a secure or introductory tenancy pursuant to an order made under Part 2 of schedule 5, or paragraph 9(2) or (3) of schedule 7, to the Civil Partnership Act 2004 (property adjustment orders in connection with civil partnership proceedings or after overseas dissolution of civil partnership).*
- i) *A transfer initiated by a private registered provider of social housing of a secure or introductory tenancy (i.e. not initiated by an application for a transfer by the tenant).*
- j) *A tenancy being granted as part of a surrender and re-grant where two social housing tenants wish to exchange their homes and one tenant holds a flexible tenancy or an assured shorthold tenancy.*
- k) *Where a tenant has been displaced from previous accommodation and has been provided with suitable alternative accommodation under the Land Compensation Act 1973.*

- l) The granting of a secure tenancy to a former owner-occupier or statutory tenant of a defective dwelling house acquired by the Local Authority.*
- m) The granting of a secure tenancy to a person who is already a secure tenant or an assured tenant of a private registered provider of social housing unless the person applies for a transfer and is entitled to a statutory reasonable preference.*

D.2 The letting of a property and actual entry by an Applicant into a tenancy agreement for a particular property is beyond the scope of this Scheme. The Local Authority's Tenancy Policy determines how decisions are made about type of tenancy an Applicant might be given [\[insert hyper-link\]](#). Each Registered Provider also has their own tenancy policy, copies of which can be requested from individual organisations.

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Appendix E – Determining an Applicants’ ability to afford an allocation of social rented housing

- E.1. An Applicant will be disqualified from joining the Scheme if they have outstanding rent arrears or other property related liabilities above a specified cap.
- E.2. Property related liabilities shall be limited to outstanding current or former rent arrears, service charge arrears and recharges for property related damage. Any liabilities that are statute barred, were not accrued by the Applicant, or were accrued as result of financial abuse shall be wholly disregarded.
- E.3. The following criterion will be used when determining whether to disqualify an Applicant with outstanding property related liabilities:
- An Applicant’s liabilities exceed more than 1/12th the annual repayment amount, and
 - they have failed to make three monthly or 12 weekly consecutive payments.
- E.4. Notwithstanding the above, any allocation is conditional on an Applicant being able to pay any charges (e.g. rent and/or services charges) levied for occupying a dwelling.
- E.5. Any amount an Applicant is charged for occupying a dwelling e.g. rental charges must be demonstrated to be affordable for them.
- E.6. What an Applicant can afford to pay will vary according to the type of dwelling and their personal circumstances.
- E.7. Following a property being allocated, the Local Authority will wish to consider affordability as part of their processes for allocating a property.
- E.8. When determining affordability, the Local Authority shall consider whether an Applicant can afford the housing costs of the property they have been allocated, without being deprived of basic essentials, such as food, clothing, heating, transport and other essentials specific to their circumstances.
- E.9. All income should be taken account of when determining an Applicants’ reasonable living expenses, other than rent, having regard to any children who might reside with them (local authorities have a duty to promote and safeguard the welfare of children under Children Act 1989, which is relevant in the matter of determining affordability). The following will be considered income for the purpose of an affordability assessment:
- a) Salary

- b) Compensation, including fees, commissions, fringe benefits, etc
- c) Gains derived from dealing in property
- d) Interest
- e) Rents
- f) Royalties
- g) Dividends
- h) Annuities
- i) Income from life insurance and endowment contracts
- j) Shares
- k) Income from a trust

- E.10. If an Applicant is unable to pay any or all of the housing costs, the Local Authority registered provider might arrange for another source of funding (e.g. Discretionary Housing Payment). In cases involving a child, this might be from the Local Authority's Children Services under Children Act 1989 section 17. After housing costs, a tenant should be left with sufficient income to pay all other reasonable costs.
- E.11. An Applicant shall have the right to request a review of an affordability assessment, this should extend to the right to a review of any charges levied for occupying a dwelling. Should an Applicant remain dissatisfied, they shall be informed of their right to make a complaint to the relevant ombudsman and/or pursue judicial review.
- E.12. The following formula shall be followed to determine whether charges for a dwelling are affordable
- E.13. Evidence for an Applicant:
- a) Total income from all sources, including earnings, fees, other payments, savings, welfare benefits they are in receipt of or would be entitled to claim
 - b) Total debts, including priority and non-priority debts
- E.14. Ignore any:
- a) tenancy related debts that are statute barred
 - b) not accrued by the tenant
 - c) accrued as a result of financial abuse
- E.15. Once the above factors have been ignored, take note the total amount of outstanding income.
- E.16. To determine whether a prospective tenant can afford the housing costs of the property that has been allocated to them
- a) Take note of their total income

- b) Deduct from the total income received, housing costs (including rental charge and any service charge)
- c) Deduct from the total income received, other reasonable living expenses, equal to Universal Credit standard allowances, for items such as,
 - i. food
 - ii. clothing
 - iii. heating
 - iv. transport
 - v. other essentials, specific to the circumstances of the prospective tenant (and any other person that lives with them, or might be reasonably expected to live with them)
- d) Deduct from the total income received, relevant expenditure to nurture and keep safe any child that lives in the household
- e) Deduct from the total income received any priority debts, such as,
 - i. court fines
 - ii. council tax
 - iii. TV licence
 - iv. child maintenance
 - v. gas and electricity bills
 - vi. Income Tax, National Insurance and VAT
 - vii. mortgage and any loans secured against a home owned by the Applicant (and any other person that lives with them, or might be reasonably expected to live with them)
 - viii. hire purchase agreements if what has been purchased is essential

E.17. From the remaining amount of income, a calculation can be made as to whether the prospective tenant can afford the housing costs of the property that has been allocated to them.

E.18. Where two or more people will hold a tenancy jointly, income and debts from all tenants should be taken account of.

Appendix F – Determining an Applicants’ entitlement to bedrooms, for assessing overcrowding, under-occupancy and for an allocation of accommodation

- F.1 For the purposes of determining overcrowding, an assessment will be made against the minimum room size for licensed HMOs (for licences issued after 1st October 2018) or the UK Government’s Bedroom Standard for any other type of dwelling, which allows a separate bedroom each for:
- A. A married couple, cohabiting couple or single parent
 - B. An Adult
 - C. Pair of adolescents aged 10-20 years of the same sex
 - D. Pair of children aged under 10 years regardless of sex
 - E. An adolescent aged 10-20 years paired with a child aged under 10 years or the same sex
 - F. An unpaired adolescent aged under 21 years
 - G. An unpaired child aged under 10 years
- F.2 Once an Applicant’s bedroom needs are known, the Local Authority will confirm whether an Applicant’s existing accommodation is overcrowded or under-occupied. The Local Authority will confirm the size and type of the existing accommodation and the usual members of the Applicant’s household. This might include the Local Authority (or an agent on its behalf) carrying out an inspection of an Applicant’s current accommodation, or seeking evidence from their current landlord or other relevant parties.
- F.3 Whilst determining whether an Applicant is overcrowded or under-occupied, the Local Authority will consider whether any other services could assist an Applicant in resolving their overcrowding or under-occupation and will advise the Applicant accordingly.
- F.4 The Local Authority will notify Applicants as to whether they are overcrowded or under-occupying. Applicants that are overcrowded or under-occupied by two or more bedrooms will be placed in Band A. Applicants that are overcrowded or under-occupied by one bedroom will be placed in Band B. Applicants that are not overcrowded or under-occupied will not qualify to join the Scheme, unless there are any other grounds relevant to their Application.
- F.5 Applicants who have contrived an overcrowding or under-occupation situation will not qualify to join the Scheme.

F.6 Applicants will each be entitled to one bedroom each (this includes students and members of the armed forces or reserve forces and any other person who is temporarily away and intend to return home):

- A. A married couple, cohabiting couple or single parent
- B. An Adult
- C. Pair of adolescents aged 10-20 years
- D. Pair of children aged under 10 years regardless of sex
- E. An adolescent aged 10-20 years paired with a child aged under 10 years or the same sex
- F. An unpaired adolescent aged under 21 years
- G. An unpaired child aged under 10 years
- H. A household member who cannot share due to a disability or medical condition, or due to fostering arrangements being facilitated by the Local Authority.
- I. An overnight carer for any usual household member, if the carer isn't a usual household member.
- J. Approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
- K. A new approved adopter or foster carer for up to 52 weeks of approval if no child has been placed with the Applicant's household during that time.

F.7 Properties will be allocated to the following household types:

- A. Bedsit
 - a. A married couple, cohabiting couple or single parent, or
 - b. An Adult
- B. One-bedroom properties
 - a. A married couple, cohabiting couple or single parent, or
 - b. An Adult
- C. Two-bedroom properties
 - a. A married couple, cohabiting couple or single parent, or
 - b. An adult, with any **one** of the following:
 - i. Pair of adolescents aged 10-20 years
 - ii. Pair of children aged under 10 years regardless of gender
 - iii. An adolescent aged 10-20 years paired with a child aged under 10 years or the same gender
 - iv. An unpaired adolescent aged under 21 years
 - v. An unpaired child aged under 10 years

- vi. A household member who cannot share due to a disability or medical condition, or due to fostering arrangements being facilitated by the Local Authority.
- vii. An overnight carer for any usual household member, if the carer isn't a usual household member.
- viii. Approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
- ix. A new approved adopter or foster carer for up to 52 weeks of approval if no child has been placed with the Applicant's household during that time.

D. Three-bedroom properties

- a. A married couple, cohabiting couple or single parent, or
- b. An adult, with any **two** of the following (multiples of the same bedroom entitlements or different bedroom entitlements are permitted):
 - i. Pair of adolescents aged 10-20 years
 - ii. Pair of children aged under 10 years regardless of gender
 - iii. An adolescent aged 10-20 years paired with a child aged under 10 years or the same gender
 - iv. An unpaired adolescent aged under 21 years
 - v. An unpaired child aged under 10 years
 - vi. A household member who cannot share due to a disability or medical condition, or due to fostering arrangements being facilitated by the Local Authority.
 - vii. An overnight carer for any usual household member, if the carer isn't a usual household member.
 - viii. Approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
 - ix. A new approved adopter or foster carer for up to 52 weeks of approval if no child has been placed with the Applicant's household during that time

E. Four-bedroom properties

- a. A married couple, cohabiting couple or single parent, or
- b. An adult, with any **three** of the following (multiples of the same bedroom entitlements or different bedroom entitlements are permitted):
 - i. Pair of adolescents aged 10-20 years
 - ii. Pair of children aged under 10 years regardless of gender
 - iii. An adolescent aged 10-20 years paired with a child aged under 10 years or the same gender
 - iv. An unpaired adolescent aged under 21 years
 - v. An unpaired child aged under 10 years

- vi. A household member who cannot share due to a disability or medical condition, or due to fostering arrangements being facilitated by the Local Authority.
- vii. An overnight carer for any usual household member, if the carer isn't a usual household member.
- viii. Approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
- ix. A new approved adopter or foster carer for up to 52 weeks of approval if no child has been placed with the Applicant's household during that time

F. Five-bedroom properties

- a. A married couple, cohabiting couple or single parent, or
- b. An adult, with any **four** of the following (multiples of the same bedroom entitlements or different bedroom entitlements are permitted):
 - i. Pair of adolescents aged 10-20 years
 - ii. Pair of children aged under 10 years regardless of gender
 - iii. An adolescent aged 10-20 years paired with a child aged under 10 years or the same gender
 - iv. An unpaired adolescent aged under 21 years
 - v. An unpaired child aged under 10 years
 - vi. A household member who cannot share due to a disability or medical condition, or due to fostering arrangements being facilitated by the Local Authority.
 - vii. An overnight carer for any usual household member, if the carer isn't a usual household member.
 - viii. Approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
 - ix. A new approved adopter or foster carer for up to 52 weeks of approval if no child has been placed with the Applicant's household during that time

F.8. Applicants who are statutorily overcrowded at the point of application and remain so at the point of an offer of accommodation being made, that include adults who would be eligible and qualify for an allocation of social rented housing in their own right, will be offered allocation of multiple properties, one for the Applicant and their usual household members and another(s) for any eligible and qualifying adult(s) that would otherwise have been a household member.

F.9. Applicants who receive support from a carer who does not live with them, and who is required to stay overnight, will be allocated a property with one additional bedroom

for use by an overnight carer. A health or social care professional with direct knowledge of the Applicant's condition will be contacted by the Local Authority for an opinion of the Applicant's health and the impact on their housing needs, when evidence submitted by an Applicant requires clarification on either a point of accuracy or of the prevailing circumstances of their condition.

- F.10 Accessible properties will always be offered to Applicants with a need for such accommodation (e.g. due to disability), over those with no such need, even when those with a need might have been waiting a shorter time than those without a need. A health or social care professional with direct knowledge of the Applicant's condition will be contacted by the Local Authority for an opinion of the Applicant's health and the impact on their housing needs, when evidence submitted by an Applicant requires either clarification on a point of accuracy or of the prevailing circumstances of their condition.
- F.11 Properties purposely built for elderly Applicants will always be offered to Applicants that are elderly, over those with no such need, even when those with a need might have waited a shorter time than those without a need. A health or social care professional, or other relevant professional, with direct knowledge of the Applicant's condition will be contacted by the Local Authority for an opinion of the Applicant's health and the impact on their housing needs, when evidence submitted by an Applicant requires either clarification on a point of accuracy or of the prevailing circumstances of their condition.
- F.12 Properties suitable for Applicants that have been approved by the Local Authority to adopt or foster, who require a larger property for an adoption or fostering placement to commence, will always be offered to such Applicants over those with no such need, even when those with a need might have been waiting a shorter time than those without a need. Active involvement from the Local Authority's Children Services will be sought when making decisions about housing allocations where there is involvement with an Applicant or a usual member of their household from the Local Authority's Children Services.

Appendix G – Annual report

G.1 An annual report will be published by the Local Authority about allocations made as a result of this Scheme. . The report will consider matters such as:

- a) Who was allocated social rented housing
 - i. characteristic (e.g. age, gender, household formation etc)
 - ii. eligibility and ineligibility
 - iii. qualification and disqualification
- b) What social rented housing was allocated
 - i. number of bedrooms
 - ii. property types
 - iii. tenure type (e.g. general need social rented, general needs affordable rent, supported housing social rent, supported housing affordable rent, etc)
 - iv. tenancy length (e.g. fixed-term or long-term)
- c) When was social rented housing allocated
 - i. waiting times by band
- d) Where was social rented housing allocated
 - i. by electoral ward
- e) With whom was social rented housing allocated
 - i. by registered provider
- f) Why was social rented housing allocated
 - i. reasonable preference category
 - ii. victims of domestic abuse
 - iii. armed forces veterans
 - iv. local connection
 - v. right to move criteria
- g) How was social rented housing allocated
 - i. choice-based lettings
 - ii. direct let
 - iii. final offer
 - iv. as a result of a review decision

Appendix H - Glossary of terms

Adaptations	Adjustments to a property to assist a disabled member of the household access the property or facilities
Affordable Rent	Rented housing let by registered providers of housing to households who are eligible. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local private rented market rent.
Allocation Scheme	This is how housing is allocated in the WNC area. It prioritises applicants by using a banding system.
Applicant	A person who applies to register onto the WNC housing register.
Banding	We will categorise WNC applications into one of four bands which reflect the level of priority for housing. These bands are A, B, C, D. Applications in Band A have the highest level of priority and D the lowest.
Bid	The term used when an applicant expresses their interest in a property advertised.
Care Leaver	An adult who has spent time living in the care system, away from their family
Choice Based Letting	This scheme that allows applicants to express a choice about where they want to live from within their eligible properties.
Common Allocation Scheme	Registered Providers have chosen to enter into a common housing allocation scheme, whereby they will share with the Local Authority a common database of applicants and/or a common housing allocation policy
Compulsory Purchase Order	Legal function allowing local authorities to obtain land or property without the consent of the owner.
Direct Match	In exceptional circumstances, WNC may allocate a property to an applicant without it being advertised.
Eligibility	Eligibility determines who is eligible to, or is allowed to join the Keyways register under the provisions of the Housing Act 1996 and related legislation. A person who is not eligible will not be able to join the register or to bid for properties. Eligible applicants will then be advised what type of property (i.e. size) they are eligible to bid for.
Fixed Term Tenancy	Tenancies granted to new tenants that are for a fixed length of time. Tenancies will not normally be granted for less than five years, except for those who have not held a tenancy before, where a one year starter or introductory tenancy may be used.
Flexible Tenancy	flexible tenancy lasts for a fixed period of time (normally for an initial 10 years and subsequently 5 years upon review, unless there are

	special circumstances). When your flexible fixed term tenancy ends, the council does not have to give you another tenancy.
General Needs	Social housing is housing rented by a housing association at rents which are usually below those that are charged in the private rented sector. It is regarded to be 'general needs' housing when there is no additional support provided to tenants beyond a normal housing management and repairs service.
Habitual Residence	Whether the applicant's residence in the United Kingdom is of a settled nature. For example, it looks at the length and continuity of residence, work/work prospects or family ties.
Hard to Let	A property where one or more of the following symptoms are exhibited: a small or non-existent waiting list for the property; tenancy offers on a property frequently refused for reasons other than personal reasons; higher than normal rates of tenancy turnover for a property
Household	A group of people who live together and share money
Housing Register	A list of customers requesting social housing who are eligible for assistance in accordance with the Council's Allocation Scheme.
Housing Related Debt	Rent arrears are any housing-related debt owed to; social landlords or private landlords. Arrears includes non-payment of rent, court costs, water rates, chargeable repairs, and compensation owed to landlords where a tenancy has been ended and the tenant has failed to leave.
Independent Living	Living in a safe property, with your own self-contained apartment in a modern scheme in the heart of the community
Introductory Tenant	An introductory tenancy is a trial period before you become a secure tenant. Introductory tenants have fewer rights than secure tenants, and their tenancies can be ended more easily if they break their tenancy conditions.
Local Authority	West Northamptonshire Council
Local Lettings Scheme	Local Lettings Schemes can be agreed in exceptional circumstances for the allocation and letting of social housing within an agreed community / location or across a type of property. A Local Lettings Plan would only be agreed in consultation with the Council and partners and aims to bring benefits to the area e.g. to create more balanced sustainable communities.
Mutual Exchange	A mechanism to swap accommodation between two social housing tenants that relies on each tenant moving permanently into the other person's/tenant's property.
Nomination	The term used when a local housing authority provides, from its housing register, the name and details of an applicant to a landlord for an offer of housing.
NPH	Northamptonshire Partnership Homes – The Arms Length Management Organisation of WNC

Offer	Suitable accommodation is offered to the applicant
Prioritisation	The band in which the applicant is placed, based on their housing need.
Qualification	Criteria set out in which the applicant is able to join the scheme
Reduced Preference	The applicant is entitled to reasonable preference but are found to have sufficient resources to buy a property on the open market.
Refusal	An applicant refuses a suitable offer of accommodation
Registered Providers	A housing association or a not-for-profit company registered with Homes England to provide social or affordable housing.
Secure Tenant	As a secure tenant, you can normally live in the property for the rest of your life, as long as you do not break the conditions of the tenancy.
Social Rent	Rent that is paid typically to housing associations and/or the local authority
Social Rented Housing	Rented housing restricted by national rent controls owned by a local authority or registered provider such as Housing Associations.
Supported Housing	Accommodation is provided alongside support, supervision or care to help people live as independently as possible in the community
Tenancy	The temporary possession or occupancy of property that belongs to another person (landlord)
Temporary Accommodation	This is accommodation offered to applicants under homeless legislation. It is not provided on a long term basis.
The Scheme	The West Northamptonshire Allocation Policy
Transfer Applicants	Secure/assured tenants, with a housing need seeking to move to another dwelling/house let under secure/assured tenancies
Under-Occupying	A tenant is considered to be under-occupying their home when they have more bedrooms than they are eligible for.
WNC	West Northamptonshire Council



WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11th July 2023

Cabinet Member for Adult Care, Wellbeing and Health Integration: Councillor Matt Golby

Report Authors	<p>Sally Burns Director of Public Health Sally.Burns@westnorthants.gov.uk</p> <p>Victoria Rockall Head of Community Safety, Engagement and Resettlement Housing and Communities Victoria.Rockall@westnorthants.gov.uk</p>
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List of Approvers

Monitoring Officer	Catherine Whitehead	14/06/2023
Chief Finance Officer (S.151)	Martin Henry	14/06/2023
Communications Lead/Head of Communications	Becky Hutson	14/06/2023

List of Appendices

Appendix A	Anti-Poverty Strategy key delivery principles
Appendix B	DPH 'Poverty and the Cost of Living' Annual Report
Appendix C	Progress being made against the 32 commitments.
Appendix D	Anti-Poverty Strategy year 1 spend.
Appendix E	Anti-Poverty Strategy and Action Plan 2022/23 – A Year in Review, Overview and Scrutiny Committee 3rd May 2023.
Appendix F	HSF 3 distribution partners.

1. Purpose of Report

- 1.1. The Anti-Poverty Strategy 2022 – 2025 was approved by Cabinet in April 2022. Following Cabinet approval, the strategy was published, and a comprehensive action plan developed. Delivery of the action plan commenced in July 2022. A commitment was made that an annual report would be produced after 12 months. This is the first annual report. Its aim is to provide an update on progress and outline broad actions going forwards into year 2.

2. Executive Summary

- 2.1 The West Northamptonshire Anti- Poverty Strategy (APS) was published in April 2022. The Public Health Team and the Housing and Communities Team worked quickly with the APS Oversight Board and other partners to turn the Strategy into a series of measurable actions.
- 2.2 Due to the wide range of strategic objectives and commitments, the APS Oversight Board met in June 2022 and agreed a set of “Must Do” actions across the Strategy’s 3 priorities:
1. Supporting people who are struggling in poverty now.
 2. Preventing people from falling into poverty in the first place.
 3. Continue to influence Government and other national organisations to get a better deal for our communities in West Northants.
- 2.3 The report highlights that work on the APS has coincided with the escalating cost of living requiring specific short term actions and responses, but also that good progress has been made against the year 1 Must Dos – as reported to the Overview and Scrutiny Committee on 3 May 2023.
- 2.4 One of the most pleasing aspects of year 1 delivery has been the partnership working – between council teams, the VCS and Primary care - that has produced successful outcomes. In a recent email exchange Rachel McGrath (CEO Northamptonshire Community Foundation) remarked to Cllr Golby that “I do think the WNUA anti-poverty strategy is an exemplar in strategic collaboration to tackle poverty locally and compared to other counties, thank you to you and your team for all your hard work”.
- 2.5 This report will briefly refer to work currently being undertaken to develop and agree the refreshed series of Must Do actions for year 2, and actions to measure success against the 9 APS performance indicators highlighted in page 17 of the APS – see link below:

<https://www.westnorthants.gov.uk/community-safety-and-emergencies/tackling-poverty-west-northants>

3. Recommendations

- 3.1 It is recommended that Cabinet:

- a) Note that good progress has been made in Year 1
- b) Note that the Anti Poverty Strategy (APS) Oversight Board is committed to supporting a refreshed series of actions for year 2 – some of which are longer term, ambitious actions.

Reason for Recommendations

- 3.2 This is the first annual report of the APS. We are reporting on actions and impact to date. The delivery of the Strategy is guided by the APS Oversight Board - where there is a complete consensus to see a refreshed series of Must Do actions for year 2. A recognition to move towards priority 2 - 'preventing people from falling into poverty in the first place'.

4. Report Background

- 4.1 The Anti-Poverty Strategy 2022 – 2025 was published in April 2022 with a clear vision: 'for a fairer and more inclusive West Northamptonshire, where everyone is able to live their best life, prosperous and fulfilling, free from poverty and inequality'. In the foreword to the report, Cllr Matt Golby noted that we are "now facing some uncertainty as we emerge from the recent pandemic, which has amplified many of the inequalities that existed across our communities in West Northamptonshire. It has led to an increased need for services from the Council and partners who have been working hard to find ways to maintain and increase support for those facing hardship".
- 4.2 Since the APS was published the cost of living has increased, which has particularly increased pressure on many of our most vulnerable residents, thereby increasing health inequalities. It has and will add considerable strain to the NHS, local authority and public health services, and services provided by the voluntary and community sector (VCS) in West Northamptonshire as the numbers of residents experiencing poverty and presenting with poor health outcomes grows significantly.
- 4.3 The APS was shaped around 3 strategic priorities
 1. Supporting people who are struggling in poverty now
 2. Preventing people from falling into poverty in the first place
 3. Continue to influence Government and other national organisations to get a better deal for our communities in West Northamptonshire
- 4.4 To deliver on these priorities the strategy outlined 8 strategic objectives and 32 commitments. The Implementation Team added 9 key principles that should guide the way that we collectively work to achieve better outcomes for our residents. The APS key delivery principles are attached as Appendix A.
- 4.5 The Anti-Poverty Strategy Group established to develop the strategy continued to meet following publication in the form of an Anti- Poverty Strategy Oversight Board to drive forward delivery of the strategy and its supporting action plan.

- 4.6 It is vital that the APS continues to be delivered in partnership with other important Council strategies including:
- West Northamptonshire Housing Strategy 2022-2025
 - West Northamptonshire Community Safety Strategy
 - Northamptonshire Climate Change Strategy 2020 – 2023, as well as emerging plans and strategies in development including the Health and Wellbeing Strategy, Homelessness Strategy and Economic Regeneration Strategy.
- 4.7 The recently published DPH Annual Report 2022 – ‘Public Health Effects of the Cost of Living’ highlights the relationship between poverty and poor health. In her introduction to the report Sally Burns – the Director of Public Health – states: “This report sets out the evidence that links different aspects of poverty with health consequences, as well as the level of need across West Northamptonshire – showing our continued focus in delivering our Anti-Poverty Strategy for residents. We have also taken the opportunity to highlight just some of the amazing projects that have already been delivered in partnership with public sector, community voluntary sector and wider organisations as part of our Anti- Poverty Strategy work”. The report is attached as Appendix B. The videos that accompany the report can be found at: <https://bit.ly/DPHR22>.

5. Issues and Choices

- 5.1 Following publication of the strategy in April 2022, by June 2022 an ambitious action plan had been developed with over 100 actions to address the 3 strategic priorities. The Oversight Board agreed to focus on identified critical **‘Must Do actions’** for year 1. These primarily focused on priority 1 and supporting those facing hardship.
- 5.2 A presentation, noting the good progress that has been made against the year 1 Must Dos, was reported to the Overview and Scrutiny Committee May 2023 – see 7.5 below. A copy of the slides is attached as Appendix E.
- 5.3 This report will outline progress against each of the year 1 Must Dos, as well as noting progress against the broader 32 commitments.
- 5.4 It will end by referring to work currently being undertaken to develop and agree the refreshed series of Must Do actions for year 2, and actions to measure success against the 9 APS performance indicators.

Progress against each of the year 1 Must Dos – April 2022 to March 2023:

5.5 Community Training Partnership:

The aim of the Community Training Partnership (CTP) is to provide training for all frontline workers and volunteers (FLWVs) on the key social welfare issues in West Northamptonshire.

FLWVs come from all sectors and include:

- WNC customer services colleagues
- Social prescribers
- Colleagues providing support and advice for residents from the VCS and council
- Colleagues running food banks and food larders
- Members of faith settings and so on.

The CTP identified and amplified a range of advice, support, and referral pathways for FLWVs. These pathways included but were not be limited to:

- Housing and homelessness
- Money and debt
- Welfare rights
- Immigration issues
- Social mobility
- Employment and skills
- Mental health support
- Winter preparedness
- Long term food aid
- Early years
- Family support

The CTP will now develop and deliver training modules that upskill FLWVs to understand and help tackle the challenges outlined above: what are they hearing on the ground in their day-to-day interaction with residents, what immediate support and/or advice can they provide, and how do they refer effectively into expert support.

Following two soft market testing events in September and October 2022, the contract for the delivery of the CTP was awarded in March 2023 for a 2 year period to The Hope Centre and Community Law Service. A fast-paced mobilisation period is planned for April to June 2023. An initial range of training sessions will be delivered in July, with a full timetable planned for September to December 2023.

5.6 Household Support Fund:

The 'Must Do' action in relation to the Household Support Fund (HSF) was to review the process and learning from allocation of HSF1 and HSF2 to ensure that HSF3 was reaching those in severe hardship. It was also to work in partnership with The Food Aid Alliance (FAAWN) - an alliance of foodbanks and other food aid providers - to enable partners to develop long term food aid to support those in severe hardship.

Good progress has been made:

- To reach as many vulnerable residents as possible a significant proportion of the HSF 3 was awarded to the Northamptonshire Community Partnership for distribution by VCS partners.
- 6009 vouchers to the value of £751,125 were awarded by 21 partners.
- Over £240,000 was allocated to our Foodbanks via FAAWN.

- An additional £100k public health grant funding was allocated for 'wraparound' support' provided by VCS partners.
- Partners have been very pleased with this area of the APS:
- **Braunston Heart reported:** *'As always in a rural community, people are reluctant to come forward and admit they need help and support. It is difficult to locate those in most need and inform them of the voucher's existence. By contacting the Church, local school, toddler group and Friendly Club we now have an established network of contacts to push out the message. What was great to see this time was not only were families coming forward, but they were also encouraging their grandparents (if appropriate) to come forward too - a very proud older generation. Hopefully this also raised our profile in being a body within the village to reach out to. We are pleased to have been a part of this scheme as it has allowed us to help those in need which forms part of helping the community which is the basis of our organisation.'*
- **Food for Thought Daventry reported:** *'Massive difference to people living in market towns and villages. Some used the HSF to purchase a big shop of bulk items that they need every week and other used it sparingly as they went to maximise the duration of the grant. This opened up possibilities for people to get basic items like sanitary products and toothpaste but also healthy choices of food. Thank you to the team at NCF for their speed and efficiency of response.'*

5.7 Fuel poverty/Warm Welcoming Spaces:

The Must Do Action was to establish as a matter of urgency a cross sector fuel poverty working group identifying all possible interventions ahead of the 22/23 winter period.

The group met for the first time on 25 September 2022 and based on learning from other local authorities, the decision was taken to prioritise the creation and implementation of Warm Welcoming Spaces (WWS).

We define these spaces as a local community provision of safe, welcoming warm spaces that are free and open to residents across West Northamptonshire.

The warm welcoming spaces provide:

- A warm location
- Refreshments
- Companionship
- Information/advice on how to mitigate increases to the cost-of-living

£180,000 in public health grant funding was allocated to develop and enhance Warm Welcoming Spaces for a 3-year period to cover winters 22/23 to 25/26. £41,142 was spent in and this was able to be funded by Household Support Fund 3.

The roll out and coordination of WWS in year 1 has been successful with:

- 96 WWS registered online
- 47 of which (Over 50% of registered spaces) applied for and received grant funding to contribute towards their costs.

- This scheme has resulted in nearly 53,000 attendances in grant funded spaces over the winter months of 2022/23, resulting in a cost per attendance of £1.89.
- Of the residents attending our spaces 3,371 were referred onto wraparound services.

Next steps:

In response to evidence of continued need of Welcoming Spaces (social isolation, cost of living, mental health issues, and access to wraparound services) the small grants programme will be rolled out to support summer 2023 period.

Planning for winter 23/24 - building on best practice and lessons learnt from year 1 with an emphasis on the provision of wraparound services and enhancing the offer to our rural communities.

5.8 Money and debt:

The Must Do action was to review and expand the financial wellbeing service offer within West Northamptonshire. Good progress has been made, particularly in improving capacity in the short term while system transformation progresses.

£180,000 in funding has been awarded to 3 VCS partners to provide 4.4 FTEs emergency Money and Debt Advisors in response to increases to the cost of living for a 12 month period. The providers are:

- Community Law Service
- Citizens Advice North Oxon and South Northants
- Citizens Advice Daventry

Next steps:

The Assistant Director for Revenues and Benefits with the support of a transformational change team is working to 3 workstrands:

1. Internal Restructure – the pulling together of existing internal capacity to create a joined up money and debt advice service for residents.
2. VCS Contracts – building sustainable capacity to work in alignment with the WNC Money and Debt Service to ensure we have sufficient capacity to meet all our resident’s needs.
3. Pathways – ensuring all residents have easy and accessible access to money and debt services – this may be agile and include face to face and online access.

A business case is currently being prepared to fund a new post of Financial Inclusion Officer, supporting the delivery of the change team’s work, and providing wider strategic direction around financial wellbeing.

5.9 Immigration support and advice:

The Must Do action was to create a sustainable approach to address the shortfall in immigration support and advice to ensure all eligible residents achieve settled status.

Good progress has been made:

The Immigration Support and Advice task and finish group met for the first time in July 2022.

The task and finish group participated in a system mapping event in October.

The aim was to make sense of the complexity of this issue:

- Identify connections
- Build a collective representation of the issue
- Engage diverse stakeholders
- Integrate knowledge, skills, and experience
- Develop a coordinated response.

The initial system mapping shared with Oversight Board in December 2022 and a West Northamptonshire approach was created and shared at a soft market testing event in March 2023.

The key benefits of the approach will be:

- Serving our communities – its estimated that there may be between 2000 and 4000 residents, including children, who need this support.
- Whilst public health has a huge interest in mitigating the consequences of poverty and poor health from being trapped in the immigration system or ‘living below the radar’ – there are clear dividends for the Council in terms of:
 - Residents achieving ‘status’ being able to work in the tax paying economy.
 - Significant savings in the cost of temporary accommodation for the Northamptonshire Children's Trust.
 - Large potential savings regarding pupil premiums.
 - And finally - it's hard to put a price on improved community cohesion and public health.

The suggested West Northamptonshire approach is:

A hub and spoke model, with a network of 5 to 10 local immigration support and advice hubs across West Northamptonshire – probably based in VCS partners who already provide wraparound services e.g. a food bank, money and debt support, they may be one of our Warm Welcoming Spaces and/or distributing the Household Support Fund on our behalf.

- The network will provide a safe and reassuring first port of call for those requiring support and advice.
- This network will be focused in areas of most need – so expect a greater concentration in the N4 LAP for example; we may also locate a hub in a specific community VCS partner serving a particular community; and we will need to work out ways to cover rural locations.
- The network will triage and refer into a virtual Expert Hub that provides free of charge level 2 and 3 accredited advice and casework.

Next steps:

This Must Do will go forward into year 2 for prioritisation consideration.

5.10 Social mobility, employment, and skills:

The Must Do action was to initiate and establish an emphasis on the development of a holistic approach to learning and employment for residents, forming a learning and skills consortium that delivers in local and trusted settings.

An initial meeting of stakeholders was held in December 2022, and a task and finish group was established to map the initial offer and how to showcase it. However, progress has been slow, and this Must Do needs to roll into year 2 and receive urgent attention from May 2023 onwards.

Good progress, however, is being made on Care Leavers:

- A Mentoring proposal is currently being explored.
- Care Leavers and Anchor Institutions – a session is planned for May 2023 to support anchors to become more inclusive when recruiting and supporting care leavers.

5.11 Communications:

The Must Do action was to create a range of approaches to communicate the availability of all support and services, plus public health and primary care provision to all partners working with residents.

The focus has been on the Cost-of-Living campaign:

- The Cost of living (CoL) resource hub is live on WNC website with accompanying promotional comms (www.westnorthants.gov.uk/cost-of-living).
- Social media campaign successfully launched and shared on a rolling basis through WNC and partner channels.
- A toolkit created for Warm Welcoming Spaces and shared with partners for use.
- Approx. 80 community groups/organisations distributed cards/posters to over 40,000 residents across West Northamptonshire signposting to the online Cost of Living resource hub and phone number.
- Media coverage received from local media outlets signposting to WWS and CoL including a BBC News article focussing of COL and WWS:
<https://www.bbc.co.uk/news/articles/cv27eeygve7o>

Next steps:

- The translation of materials including videos and document handouts – includes filming of community organisations / leaders and supports signposting to key information.
- Develop a revised communications plan to be developed in alignment with HSF4 distribution looking at key milestones and/or activities for consistent promotion.
- Communications to be revised in alignment with welcoming spaces next steps.
- Review and update CoL resource hub and WWS map to ensure up to date and accurate.

6.12 Progress against the 32 commitments

The compilation of the annual report has given us time to reflect on good progress being made against the 32 commitments. Of the 32 commitments we feel that good or reasonable progress has been made against at least 22 commitments – see Appendix C.

6.13 Developing and agreeing the refreshed series of Must Do actions for year 2:

Must Do Actions year 2:

- At the APS Oversight Board on 11 May 2023, it was agreed that the implementation team will commit to a refreshed series of Must Do actions in year 2 that consolidate actions in Priority 1, transition more efforts into Priorities 2 and 3; and identify the bigger picture changes required such as economic regeneration around employment and skills, and Housing for example.
- It was noted that the cost of living crisis had driven significant year 1 effort into Priority 1 but that the success indicators of the APS were broadly more focused in Priorities 2 and 3.
- The implementation team is currently working up a draft refreshed series of year 2 Must Do actions for approval by the APS Oversight Board.

There are 4 key actions required in this planning:

1. Consolidation of Year 1 Must Dos – across Priority 1 and Priority 2.
2. Agree and deliver the Year 2 ‘Must Dos’ – transitioning more efforts into Priorities 2 and 3.
3. Agree and set milestones for the key actions around the bigger picture changes required such as economic regeneration around employment and skills, and Housing for example.
4. Measuring success against the APS 9 success outcomes - creating and populating a performance framework.

The implementation team will present the year 2 Must Do actions in 2 domains:

- Must Do actions owned by the Implementation Team.
- Must Do actions agreed and owned by other WNC teams or partners – these are likely to include economic regeneration around employment and skills, and Housing for example.

The Implementation Team will also revisit the 8 Strategic Objectives and 32 Commitments of the APS to ensure we note successes/shortfalls in year 1 and address any actions to be prioritised in the refreshed series of year 2 Must Do actions – this work has already begun - see Appendix C.

6.14 Actions to measure success against the 9 APS success indicators:

The implementation team is currently working on actions to measure success against the 9 performance indicators:

- This involves a process of finalising the refreshed series of Must Do actions in year 2 with the APS Oversight Board (anticipated summer 2023).
- Attributing the Must Do actions in year 2 to each of the 9 APS success indicators.
- Identifying High Level KPI(s) from business cases for public health funding and/or partner team’s KPIs to each year 2 action.
- Identifying a range of available indicators that can provide evidence to evaluate progress.

6. Implications (including financial implications)

6.1 Resources and Financial

- 6.1.1 £2 million of funding over 3 years from the Public Health reserve was allocated to support delivery of the Anti-Poverty Strategy actions. Poverty is associated with poor health outcomes both through the direct impact of the stresses of poverty and indirectly through inability to access basic goods for health (food, shelter, warmth etc.) As noted above in 5 – the cost of living has increased pressure on many of our most vulnerable residents, thereby increasing health inequalities.
- 6.1.2 To date £870,000 has been allocated over a period of 3 years to deliver the initial Must Do actions. Of this, £124,235 has been spent in ‘Year 1’ (2022/23)
- 6.1.3 Delivery has also involved the additional national grant funding in the form of the Household Support Fund (HSF) which is now in its fourth tranche of delivery, and in the last year distributed over £5 million to households suffering hardship and the voluntary sector organisations that support them. The availability of Household Support Funds 2 and 3 in 2022/23 has meant that expenditure to date against the £2m set aside from the Public Health Reserve has been lower than expected, as some planned projects have been funded by HSF. This has freed up additional funding in future years to be spent on Anti-Poverty Projects.
- 6.1.4 Appendix D provides an outline of what was spent in 2022/23 financial year including planned projects that were funded by HSF4.
- 6.1.5 Going forwards into year 2, there will be resource and financial implications, and these will be assessed and prioritised as part of the process of agreeing the refreshed series of Must Do actions for year 2.
- 6.1.6 A significant proportion of resources and financial support may already be allocated – for the Housing Strategy, for example.
- 6.1.7 Other Must Do actions are already part of transformational change projects – such as Money and Debt.
- 6.1.8 The implementation team will also seek to identify external funding sources if possible.
- 6.1.9 In the first instance, it’s anticipated that a paper presenting the refreshed series of Must Do actions for year 2, with potential resource and financial implications, will be taken to ELT in the summer of 2023.
- 6.1.10

6.2 Legal

- 6.2.1 There are no specific legal implications arising from the proposals.

6.3 Risk

- 6.3.1 There are no significant risks arising from the proposed recommendations in this report.

6.4 Consultation and Communications

- 6.4.1 The APS was produced by an Oversight Strategy Development Group following widespread consultation with partners and colleagues across West Northamptonshire and beyond. Salford City Council provided a range of learnings and best practice from their pioneering work in this field for example.
- 6.4.2 One of the principles of the delivery of the APS is that in order to deliver optimally we need ‘a true partnership between the VCS, Primary Care, WNC, and other partners’. The Implementation Team has remained committed to this approach.
- 6.4.3 The Oversight Strategy Development Group has transitioned and grown to become the APS Oversight Board. It meets monthly – reflecting the pressures of the cost of living.
- 6.4.4 Details of consultative and collaborative work undertaken includes:

Warm Welcoming Spaces:

- Working group and weekly cross sector project team.
- Best practice identified working with Gateshead Council.
- Fuel Poverty Task and Finish Group

Community Training Partnership:

- 2 soft marketing events to shape the programme specification.
- Sharing best practice and experience with Newham Borough Council Social Welfare Alliance Team (the model upon which the Community Training Partnership is based).
- Community Training Partnership cross sector strategy group launched.

Immigration Support and Advice:

- Immigration Support and Advice Task and Finish Group
- External Expertise: working in partnership with Dr Natalie Savona to produce a system map of the current position of immigration in West Northamptonshire.
- External Expertise: consulting Jo Wilding, author of ‘It’s a no-brainer’: Local authority funding for immigration legal advice in the UK .
- External Expertise: member of Advancing Mental Health Equality Collaborative (AMHE) Subgroup: Refugees, Asylum Seekers and Migrant Community

Household Support Fund 2 and 3:

- Following consultation with Northamptonshire Community Foundation and key VCS stakeholders, new model of delivery of HSF vouchers launched with 20 VCS partners distributing.

Food Aid:

- Working in partnership with West Northamptonshire Sustainable Food Network who are leading response to long term food support for the population alongside FAAWN who represent foodbanks and food clubs across patch.

Mental Health:

- Employment, Primary Care and Public Health working group

- NHS Talking Therapies – Northamptonshire Healthcare NHS Foundation Trust
- Food bank insights and Mental Health training information session to help compile the Mental health Joint Strategic needs Assessment.
- Mental health and suicide prevention training framework

Learning, Skills, and Employment:

- WNC's Learning and Skills Consortium Partner Workshop

Additional Partnership working:

- Attendances at VCS thematic Groups
- Attendance at Northampton City of Sanctuary Annual Meeting
- Regular Project updates at Health and Wellbeing Forums and Health and Wellbeing Board
- Project Updates to Parish Council Forum
- Project Updates: Social Prescribers' Community of Interest Group
- Sharing Best practice with Wokingham Borough Council and Frimley ICS
- Health Inequalities Workshop

Attendance and Contribution to National Events:

- Attendance and contribution toward seminar - New Local/JRF workshop 2 on designing out deep poverty and destitution.
- Attended and contributed towards Joseph Rowntree Foundation Consultation on development of rethinking how tackle poverty.
- Attended Joseph Rowntree Foundation Seminar - The cost of the renting crisis: housing subsidies and affordability in the UK'.
- Contributed towards and attended launch of national report 'It's a no-brainer': Local authority funding for immigration legal advice in the UK' by Jo Wilding
- 'Cost of Living' month briefings – Citizens Advice Bureau

Internal WNC liaison:

- Housing and Homelessness teams
- Money and Debt Transformational Change team
- Customer Services
- The Children's Trust
- Adult Social Care
- Economic Development Team

6.4.5 Details of communications with residents include:

Online support:

Cost of Living Hub:

<https://www.westnorthants.gov.uk/cost-living-support>

Warm Welcoming Spaces information including online register:

<https://www.westnorthants.gov.uk/cost-living-support/looking-warm-spaces>

Northants Live website – Warm Welcoming Spaces:

<https://www.northantslive.news/news/northamptonshire-news/warm-spaces-across-west-northants-7845892>

Toolkits:

- Warm Welcoming Spaces toolkit

Hard copy information:

- Cost of Living Cards
- Cost of Living Poster

The following information has been distributed through our Warm Welcoming Spaces programme:

- Armed Forces Community Partners Resource Pack
- Energy and Food Poverty Project – Age Concern
- NHS leaflet – Here when you need Us”
- NHS leaflet – List of Crisis Cafes
- Northamptonshire Safeguarding Adults Board – Training Timetable
- Leaflet – Northamptonshire Good Neighbour Schemes
- West Northamptonshire Council Leaflet – Employment Support Services
- IAPT leaflet – Talking Therapies
- Mind Mental Health Navigator Directory of Services

Press:

- BBC News website - Warm Welcoming Spaces featuring Councillor Matt Golby and Alex Copeland of The Hope Centre <https://www.bbc.co.uk/news/articles/cv27eeygve7o>

6.4.6 We continue to invest in the Poverty Truth Commission, led by Voluntary Impact Northamptonshire, capturing the lived experience of those living in Poverty or facing hardship.

6.5 **Consideration by Overview and Scrutiny:**

A presentation was made to the Overview and Scrutiny Committee on 3 May 2023. This is attached as Appendix E.

Key comments were:

- How do we have more focus on priority 2 of the strategy going forwards into year 2.
- It was noted that the cost of living crisis compelled us to focus on Priority 1.
- How do we reduce dependency on the public health reserve and HSF?

6.6 **Climate Impact:**

In year 1, the ‘Sustainable Heat Network Feasibility’ Study has been funded and the results will help shape Fuel Poverty and Climate Emergency policy and practice moving forward.

The Fuel Poverty priorities in year 2 and beyond aims to reduce poverty and the carbon footprint. Proposed actions include improving insulation in homes and retro-fitting social housing in partnership with our Housing Team and Housing Associations - contributing towards the Council goal of reaching Net Zero by 2030.

6.7 Community Impact:

- 6.7.1 One of the delivery principles of the APS is to deliver against need in local and trusted settings across our urban and rural geography.
- 6.7.2 An example of this is the delivery of the HSF – where to reach as many residents experiencing poverty as possible, a significant proportion of the HSF 2 and 3 funding rounds was awarded to the Northamptonshire Community Partnership for distribution by VCS partners. The list of HSF 3 distribution partners is attached as Appendix F. This also gives the numbers of residents who were allocated vouchers. The breakdown of distribution by ward is also available providing evidence that we were able to support both urban and rural communities.
- 6.7.3 The WWS project has illustrated widespread community impact and the key metrics have been provided in 6.
- 6.7.4 The APS has worked in close alignment to the implementation of Local Area Partnerships.
- 6.7.5 The design of the immigration support and advice concept – for delivery in year 2 – has been specifically designed and soft market tested - to deliver in local and trusted settings. It's a hub and spoke model. The concept provides a network of 5 to 10 local immigration support and advice hubs across West Northamptonshire who will triage and refer into a virtual Expert Hub that provides free of charge level 2 and 3 accredited advice and casework. More detail has been provided in 6.

7. Background Papers

- 7.1 The Implementation Team has strived to stay up to date with thoughts and approaches around long term poverty drivers and the current cost of living– with escalating levels of residents experiencing poverty. The list below are our key sources of guidance, best practice, learning, and inspiration:
- NHS Long Term Plan 2019
<https://www.longtermplan.nhs.uk>
 - The Hewitt Review: an independent review of integrated care systems
<https://www.gov.uk/government/publications/the-hewitt-review-an-independent-review-of-integrated-care-systems>
 - The Marmot Review 10 years on - [Marmot Review 10 Years On - IHE \(instituteofhealthequity.org\)](https://www.instituteofhealthequity.org)
 - 'Fuel Poverty, Cold Homes, and Health Inequalities in the UK' – Sir Michael Marmot.
<https://www.instituteofhealthequity.org/resources-reports/fuel-poverty-cold-homes-and-health-inequalities-in-the-uk>
 - UK Poverty 2022: The essential guide to understanding poverty in the UK - JRF
<https://www.jrf.org.uk/report/uk-poverty-2022>
 - Destitution in the UK 2020 – JRF
[Destitution in the UK 2020 | JRF](https://www.jrf.org.uk/report/destitution-in-the-uk-2020)

- 'It's a no-brainer': Local authority funding for immigration legal advice in the UK - Jo Wilding
<https://justice-together.org.uk/wp-content/uploads/2023/05/JT-Local-authority-funding-for-immigration-v3.pdf>
- The Gateshead model of Warm Welcoming Spaces
<https://www.gateshead.gov.uk/article/21164/Warm-Spaces>
- Monthly 'Cost of Living Briefings' from CAB provides latest trends and crucial national data for ongoing needs analysis.
- Newham Social Welfare Alliance training framework – [Newham Social Welfare Alliance Programme Sept -Nov 2022](#)
- Newham Social Welfare Alliance for November 2020 (especially executive summary) - [social-welfare-alliance-report-nov-20-july-21 \(newham.gov.uk\)](#)
- Bromley By Bow case study of the Newham Social Welfare Alliance - [Microsoft Word - Newham Case Study.docx \(bbbc.org.uk\)](#)
- Poverty in Northampton, Hope Centre - [9322-Poverty-report-FINAL-PRINT.pdf \(northamptonhopecentre.org.uk\)](#)
- Integrated Care Northamptonshire Strategy – 'Live Your Best Life'
<https://www.icnorthamptonshire.org.uk/download.cfm?doc=docm93jjm4n21837.pdf&ver=53062>
- West Northamptonshire Strategic Plan
<https://www.westnorthants.gov.uk/corporate-plan/our-strategy>

APS Key Delivery Principles

	Principle
1.	A true partnership between the VCS, Primary Care, WNC ,and other partners will enable this to work
2.	A communication and engagement strategy is vital
3.	Deliver against need in local and trusted settings across our urban and rural geography
4.	Utilise the emerging framework of the neighbourhood areas and link these actions with developments in the creation of the Integrated Care System in Local Area Partnerships
5.	Wraparound - develop broad multi-service models that may be wrapped around an initial primary concern such as the provision of food, primary care, or a key form of advice
6.	Joined up working - as recommended for the various consortium approaches – across long term food aid, debt, immigration support and advice, and learning and employment - will be essential
7.	Funding of local partners to deliver actions and build capacity and ensure local reach to most vulnerable
8.	Keep reflecting and maintain a 'real time' list of evolving key actions that we must continue to implement in priorities 1 and 2
9.	Provide a balance of alleviating immediate hardship and providing progressive solutions

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**DIRECTOR OF
PUBLIC HEALTH
ANNUAL REPORT
2022**

**PUBLIC HEALTH EFFECTS
OF THE COST OF LIVING CRISIS**

Wellbeing
WEST NORTHANTS

Page 475



**West
Northamptonshire
Council**

Welcome to this year's Director of Public Health (DPH) Annual Report. West Northamptonshire Council has strengthened its commitment towards helping people live their best lives by adopting a fresh approach towards tackling poverty and deprivation, as set out in our Anti-Poverty Strategy.

This Annual Report strengthens the case for action, documenting the challenges that still face our residents and identifying actions we need to take, not just as a local authority, but as a whole health and care system. In the video showcase that accompanies this report, highlights the many brilliant projects and examples of partnership working that are already underway to help prevent and mitigate against the effects of poverty across West Northants.

Cllr Matt Golby,

Cabinet Member for Adult Social Care, Public Health and Wellbeing



I'm very pleased to introduce this first Director of Public Health (DPH) Annual Report for West Northamptonshire. The last DPH Annual Report was for the whole of Northamptonshire and focused on the work of the previous two years that addressed the biggest public health emergency in generations – the COVID-19 pandemic. In the last year we have been facing a second major threat to health and wellbeing in the form of a cost-of-living crisis.

The drivers and impacts of health inequalities were made even more clear through the pandemic. We have seen the positive impact that good work, education and warm and secure housing has on our physical and mental health. We have also seen those with low incomes being most vulnerable to losing one or more of these key determinants of health.

This report sets out the evidence that links different aspects of poverty with health consequences, as well as the level of need across West Northamptonshire – showing our continued focus in delivering our Anti-Poverty Strategy for residents.

We have also taken the opportunity to highlight just some of the amazing projects that have already been delivered in partnership with public sector, community voluntary sector and wider organisations as part of our Anti- Poverty Strategy work.

I'd like to extend my heartfelt thanks to all of the groups who have worked so closely on this agenda in recent years. Only a very small selection of examples were able to be included in this report, but we do encourage readers to find wider information on our anti-poverty projects published regularly as Health and Wellbeing Board updates.

In the accompanying videos we show just some of the local work already undertaken to deliver the strategy. We hope this will further galvanise the system to deliver even better health and wellbeing outcomes for our residents.

Sally Burns,

Director of Public Health



RELATIONSHIP BETWEEN POVERTY AND HEALTH

Poverty means not having enough money to meet basic living needs like food, clothing and warm shelter. This has a direct impact on people's physical health, as well as their mental health due to the stresses and strains of surviving without enough money.

The relationship between poverty and health is complex and works both ways – people who have poorer health are at greater risk of living in poverty.

We know that the longer someone lives in poverty, particularly in childhood, the worse their health outcomes are¹.

In communities where the percentage of households living in poverty is higher, healthy life expectancy is lower. An increase of 1% in the percentage of households living in relative poverty is associated with a 6-month decrease in male healthy life expectancy in that community.²

The national economic downturn has meant that the number of people struggling to make ends meet will have increased.

In West Northamptonshire we estimate as of 2019 that around 37,300 people (nearly 1 in 10 of our residents) were living in households receiving less than 60% of the average UK income; including 13% of children and 11% of older people aged over 60³. It's important to note that these figures may be falsely reassuring; as costs of goods increase faster than wages increase, we may see more people unable to afford basic goods, but the "relative poverty" numbers may not change.

Data from the 2021 Census found that 33.2% of households in West Northants were deprived on one factor of deprivation being either; education, employment, health or housing compared with 33.5% in England. In addition, 12.1% were deprived on two factors (14.2% England), 2.7% were deprived on three factors (3.7% England), and 0.2% were deprived on all four factors (0.2% England).⁴



1. Green et al. Timing of poverty in childhood and adolescent health: Evidence from the US and UK <https://doi.org/10.1016/j.socscimed.2017.12.004>

2. The Health Foundation. Relationship between poverty and healthy life expectancy by neighbourhood. www.health.org.uk/evidence-hub/money-and-resources/poverty/relationship-between-health-and-poverty?gclid=EAlalQobChML_PDTgN6f_wIVBMbtCh1bPgenEAAAYASAAEgJv0fD_BwE

3. Office for Health Improvement and Disparities (OHID). Public Health Profiles <https://fingertips.phe.org.uk/>

4. ONS. Census 2021. www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/buildacustomareaprofile/ 22.01.17

WHO IS MOST AT RISK OF LIVING IN POVERTY?

We know that certain groups are more likely than others to be living in poverty; families with children (particularly lone parents), people from certain ethnic minority groups, people with disabilities, people with long term conditions, carers and care leavers, those who are unemployed, those with irregular immigration status (vulnerable migrants) and other socially excluded groups including Gypsy Roma Travellers.^{5/6}

In West Northamptonshire:



2.4% of people aged over 16 are unemployed which is equivalent to over 8,100 people; ranging from 5.2% unemployment in Northampton town centre to 1% in Clipston, Naseby and Yelvertoft.



19.1% of households in West Northamptonshire privately rent, which is almost a fifth of households (20.5% England average) which is a significant increase from 6.5% in 2001.



The ethnic groups at greatest risk of living in poverty in the UK are Bangladeshi and Black African communities. Only 1.1% of the population of West Northants identify as Bangladeshi and 3.4% as Black African⁷.



5.9% of residents (around 25,000) say their life is limited by a long term physical or mental health condition or illness, compared to 7.1% across England.



8.2% (ASP⁸) of the population (around 34,000 people) aged 5 and over provide some level of unpaid care to others weekly, compared to 8.9% (ASP) across England as a whole.



The Cost of Living Vulnerability Index (CLV Index) is a measure developed by the Centre for Progressive Policy, that seeks to identify parts of England experiencing particular hardship in the current economic climate. The CLV Index includes six indicators: fuel poverty, food insecurity, child poverty, claimant count, economic inactivity and low pay.⁹ Compared with other local authorities in England, West Northants ranked around the middle in terms of overall cost of living vulnerability. Focusing only on the work-based indicator which includes rates of economic inactivity and low pay – West Northants was ranked 110 out of 307 (1=worst).



6.6% of households are lone parent households which is equivalent to 11,313 households, as opposed to 6.9% of lone parent households nationally. There has been very little growth compared to 2011.



5. UK Parliament. Poverty in the UK: Statistics. <https://commonslibrary.parliament.uk/research-briefings/sn07096/>

6. West Northamptonshire Council. Anti-Poverty Strategy 2022-25. www.westnorthants.gov.uk/community-safety-and-emergencies/tackling-poverty-west-northants

7. Runnymede Trust. The Colour of Money. www.runnymedetrust.org/publications/the-colour-of-money

8. Should this be an * instead as not actually a reference?

9. Centre for Progressive Policy. The levelling up outlook #5. www.progressive-policy.net/publications/the-levelling-up-outlook-5

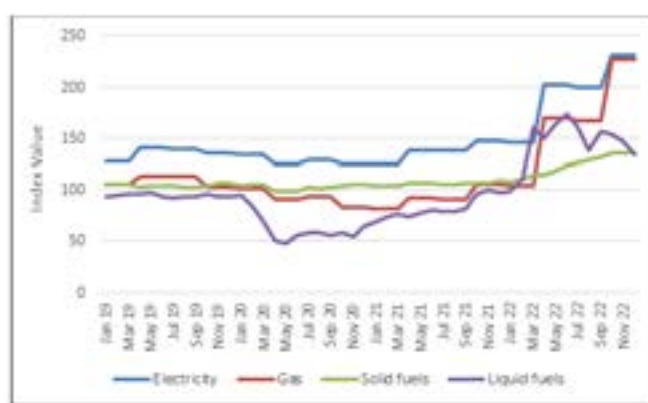


It was estimated that in 2020 approximately 12% of households were living in fuel poverty in West Northants, meaning that around 20,000 households were living in homes with an energy efficiency rating of D or lower and with a disposable income (after housing and fuel costs) that falls below the poverty line. Between January and December 2022, gas prices in the UK increased by 118% in real terms, therefore it is likely that the figure for those experiencing fuel poverty is a significant under-estimate.¹⁰

Fuel poor households and cold homes are linked to an increased risk of developing a wide range of health conditions, especially respiratory and cardiovascular, as well as poor mental health and unintentional injury¹¹.

In the winter, there are patterns of higher death rates which are likely linked in large part to the cold, often referred to as “excess winter deaths”. In 2019–20 West Northants saw an estimated 210 excess winter deaths¹². Estimates suggest that 10 per cent of excess winter deaths are directly attributable to fuel poverty¹³.

In our most deprived communities, 27% of gross income is spent on housing and power only (July 2022, Source: ONS), compared with 13% in the least deprived. Those most likely to be living in fuel poverty include; households living in privately rented accommodation (25% are fuel poor); those who are unemployed (37% compared with 13% general population); single parents of dependent children (27% are fuel poor compared with 10% of single people over 60).



Fuel price indices in the UK (2019-2022)

Homes that are cold and damp as a result of fuel poverty increase the risk of poor health and specific conditions such as lung and heart disease and in extreme conditions may lead to hypothermia.

Example projects

The Northampton Whole House Retrofit Project helps tenants living in older homes such as 1920s and 1930s built, that are managed by Northampton Partnership Homes (NPH). The Council was one of only 17 local authority areas to be awarded demonstrator funding from the Social Housing Decarbonisation Fund (SHDF) for this project.

This project has seen NPH work with leading domestic retrofit organisations to assess each home, taking a ‘whole house approach’ to understand which measures could make the most impact, such as external wall insulation, solar panels, loft insulation, changes to ventilation and new windows and doors.

All homes had a smart thermostat installed which is fitted with sensors that enable the project team to monitor the impact of these measures on internal air quality, temperature, and humidity levels. The device helps to identify households at risk of fuel poverty and has a clever function that allows NPH to communicate directly with the households.

This project won ‘Most innovative retrofit/refurbishment scheme’ at the Housing Digital Innovation Awards 2023. The energy efficiency improvements will help to protect households from the worst impacts of rising energy costs, saving them hundreds of pounds per year on heating bills, but will also have a huge impact on emissions - reducing the carbon footprint of the homes by up to 95% in some cases.

10. GOV.UK. Domestic energy prices indices. www.gov.uk/government/statistical-data-sets/monthly-domestic-energy-price-stastics

11. Institute of Health Equity. Fuel Poverty, Cold Homes and Health Inequalities in the UK. www.instituteofhealthequity.org/resources-reports/fuel-poverty-cold-homes-and-health-inequalities-in-the-uk/read-the-report.pdf

12. Office for Health Improvement and Disparities (OHID). Public Health Profiles. <https://fingertips.phe.org.uk/>

13. Institute of Health Equity. Fuel Poverty, Cold Homes and Health Inequalities in the UK. www.instituteofhealthequity.org/resources-reports/fuel-poverty-cold-homes-and-health-inequalities-in-the-uk/read-the-report.pdf

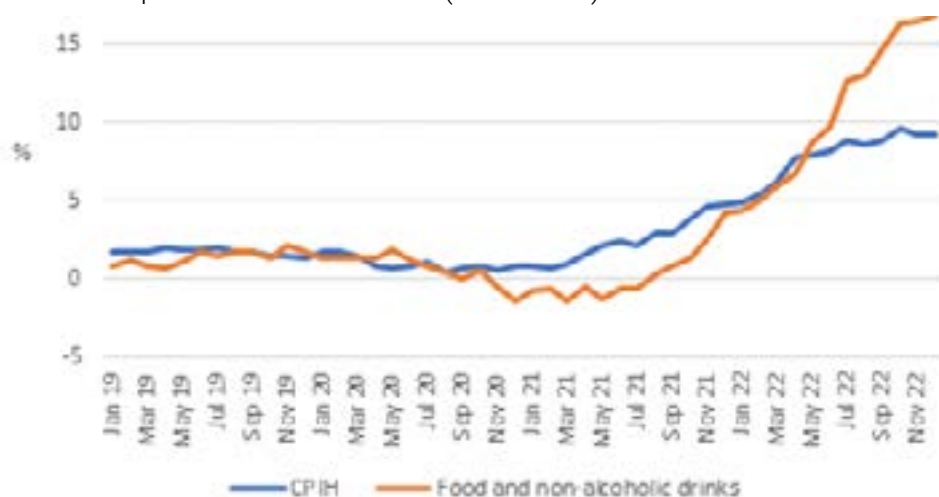
14. Office for Health Improvement and Disparities (OHID). Public Health Profiles. <https://fingertips.phe.org.uk/>

FOOD INSECURITY

Food security means having access at all times to enough food that is both sufficiently varied and culturally appropriate to sustain an active and healthy life. In 2020/21, 9% of households in the East Midlands – equivalent to around 15,600 households in West Northamptonshire did not have food security¹⁶; around half of these households will have had members of the family who have missed meals or had to eat less due to a lack of money for food.¹⁷

The Consumer Prices Index measures the change in average prices paid by consumers for goods and services and from January 2022 to December 2022, it increased by 9.2%. During this time, prices for food and non-alcoholic drinks rose by 16.9%, and the annual rate of inflation for this category has risen for 17 consecutive months. It is suggested that the last time the rate was higher than this was in September 1977, when it was estimated to be 17.6%.¹⁸ In our most deprived communities, 18% of gross income is spent on food and non-alcoholic drinks, compared with 12% in the least deprived. Family Spending ONS research suggests that even the lowest-priced food items have increased in cost by around 17% over the 12 months to September 2022¹⁹.

Consumer price inflation in the UK (2019-2022)



In 2021/22, 15% of schoolchildren in West Northants were eligible for free school meals (FSM), of which around 13% took up this offer. The proportion eligible for FSM across Northamptonshire has increased from 12% in 2015/16 to 16% in 2021/22, a pattern that follows the national and regional trajectory - though nationally there has been a greater rise in eligibility for FSM¹⁵.

Those who access food banks are a relatively small proportion, compared to those experiencing food insecurity. However, the large increase in food prices in 2022 has had a significant impact with increased demand for emergency food aid. This is evident in West Northants, with an average of 3,600 food aid parcels per week distributed by 29 food aid providers in December 2022. This does not include the additional 2,700 individuals per week (approx) paying for subsidised food from food clubs/community larders.

Food insecurity impacts on health and wellbeing across a person's life, from risk of health problems in new-borns, to links with impaired childhood development, risk of chronic diseases in adulthood and frailty in older age. 12% of deaths in Northamptonshire in 2019 were attributable to poor diets²⁰. Importantly, food insecurity means people going hungry, therefore potentially having low intake and low bodyweight, but it can also mean people only being able to afford poor quality processed foods which have high fat/salt/sugar, and can lead to higher rates of obesity.

15. GOV.UK. Schools, pupils and their characteristics. <https://explore-education-statistics.service.gov.uk/find-statistics/school-pupils-and-their-characteristics?msclid=ea854515aea311ec938b79fd152acd3as>

16. Office for Health Improvement and Disparities (OHID). Public Health Profiles. <https://fingertips.phe.org.uk/>

17. GOV.UK Family Resources Survey: Financial year 2019-20. www.gov.uk/government/statistics/family-resources-survey-financial-year-2019-to-2020

18. ONS. Census 2021. www.ons.gov.uk/economy/inflationandpriceindices/bulletins/consumerpriceinflation/december2022

19. ONS. Census 2021. www.ons.gov.uk/economy/inflationandpriceindices/articles/trackingthelowestcostgroceryitemsukexperimentalanalysis/april2021toseptember2022

20. The Institute for Health Metrics and Evaluation (IHME). GBD Compare. <https://vizhub.healthdata.org/gbd-compare/>



Example projects

Food Aid Alliance West Northamptonshire (FAAWN) was established in 2020, bringing together a wide variety of food aid providers in the county in the midst of a pandemic. It was built on the success of the Northamptonshire Food Poverty Network, led by Northamptonshire Community Foundation (NCF) since 2005, but since this time the landscape of support has increased and now there are over 30 charities in West Northants alone that support people in financial hardship through the provision of food.

The charities and groups that are represented have a range of approaches to food aid provision including food banks, pantries/community fridges, food waste reduction schemes and food clubs. Although there are different models of delivery, there is a common purpose of intending to provide for those in financial hardship, and help them move towards greater financial stability.

FAAWN was established with the focus to bring together all food aid providers to work collaboratively, share good practice and training opportunities, share surplus resources and support with deficit and funding. The group meet together quarterly, and are governed by a Memorandum of Understanding which was agreed by FAAWN members in March 2023. This includes the process of appointing the FAAWN board and admission to the FAAWN.

The members of FAAWN work closely with other VCSE organisations to ensure that advice and signposting for welfare support is available for all accessing food aid. Many of the organisations provide additional support including life skills such as cooking or growing fruit/veg, budgeting or debt management, mental health and wellbeing support and advice/advocacy services to support with a wide range of socio-economic problems.

This wrap around support offer will only be enhanced by the Community Training Partnership, launching this summer, which will train front-line staff from across statutory and voluntary services in wellbeing and welfare rights issues.



GOOD WORK AND INCOME

Having a safe and secure job with good working hours and conditions (“good” work) can positively impact your health; having a purpose, regular social contact and feeling useful are all crucial for our wellbeing, as well as having an income that allows us to secure the material things we need for good health. Broadly, unemployment is a major risk factor for slipping into poverty, however in this current economic climate even working families are struggling to make household budgets stretch.

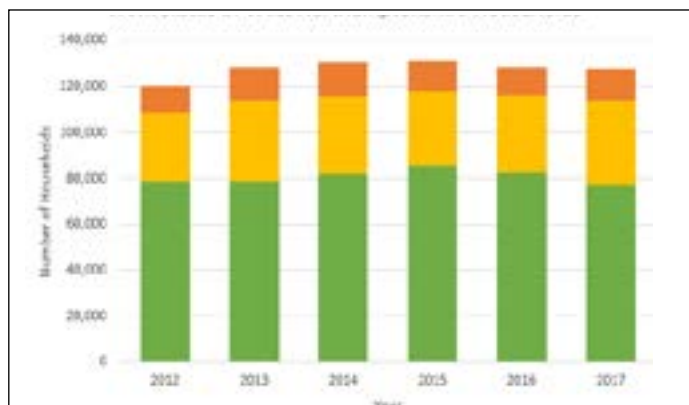
In Northamptonshire we have generally high rates of employment and low rates of unemployment. 62.9% of people aged over 16 in West Northamptonshire were in employment in 2021; among the top 20% of local authorities for high employment rates. However, despite high rates of employment we also have high rates of low paid employment with 14.7% in “routine occupations” which include HGV drivers, cleaners, porters, packagers, labourer and waiters (among the highest 40% of local authorities). In October 2022, 13.4% of adults aged 16 to 64 claimed Universal Credit in West Northants, which is a benefit that can be claimed for people on a low income or unemployed. In the area, there are also unequal access to jobs – in 2021/22 the employment rate for those with a physical or mental long term health condition (aged 16 to 64) was 7% lower than the overall employment rate.

Recent trends, exacerbated by COVID-19 has seen an increase of those who are of working age stop working and become ‘economically inactive’ by either taking retirement, some early retirement, or being unable to work due to long term sickness or caring responsibilities. The economic inactivity rate among adults aged 16-64 in West Northants has consistently been lower than the UK average until the start of the Covid-19 pandemic at which point it has risen similar to the UK average. In the financial year 2021/22, 18.8% of adults (nearly 47,000 people) aged under 65 were economically inactive in West Northants compared to 15.5% pre-pandemic (2018/19).²¹

The average annual income after housing costs across West Northants is £30,509 (compared with England £28,248), however this ranges significantly across the area. In the Castle, Abington and Phippsville, St George and Dallington Spencer area the average annual income after housing costs is £24,702, compared to Silverstone, Middle Cheney and Brackley which is £36,681.

The 2019 Index of Multiple Deprivation (IMD) is the official measure showing how deprived an area is relative to other areas in England²². It combines measures on seven different aspects of deprivation - income, employment, education, health and disability, crime, barriers to housing and services and the living environment.

This map focuses on income deprivation across West Northants and shows where neighbourhoods rank in terms of low-income households across England (red = neighbourhoods among the most income deprived 20% in England, dark green = among the least income deprived 20% in England). As shown in the map, in West Northants, the main areas of income deprivation were located around Northampton and Daventry.



Work status of West Northamptonshire Households

Source: <https://www.nomisweb.co.uk>

21. ONS. Economically inactive. www.nomisweb.co.uk/reports/lmp/la/1811939769/subreports/einact_time_series/report.aspx?

22. GOV.UK. English indices of deprivation 2019. www.gov.uk/government/statistics/english-indices-of-deprivation-2019



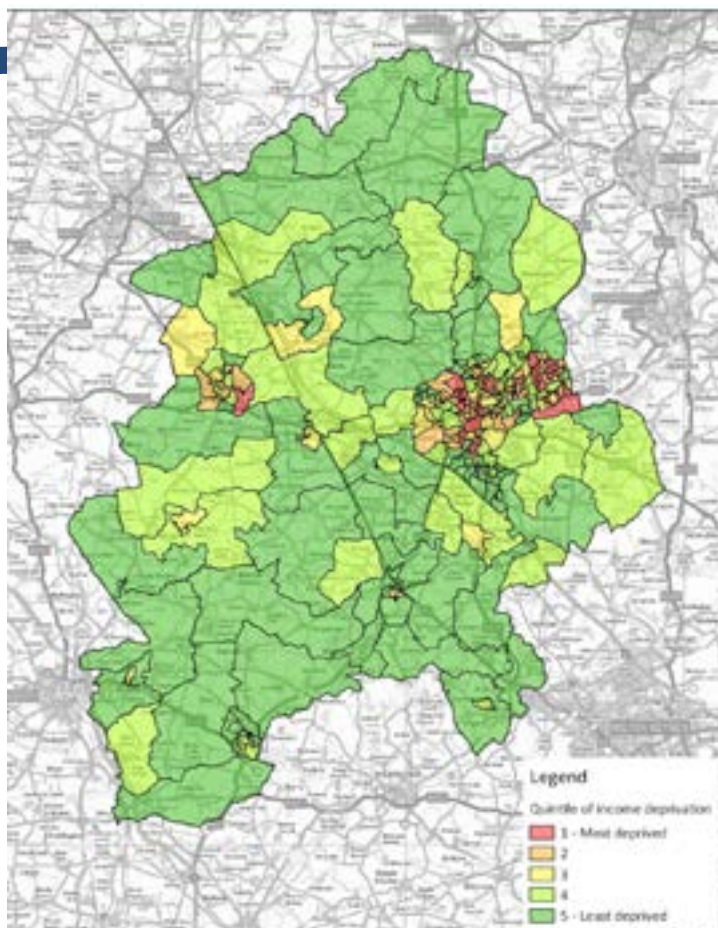
Example projects

WNCs free Employment Support Service is available to every resident and employer in West Northamptonshire. The service is available to support finding a new job as easy as possible and includes a variety of support, including mental health, training, upskilling, volunteering, searching for suitable roles and transportation issues to name a few.

With the ambition to work with every resident to access the support and training needed to find local employment and enable employers to utilise the skilled local workforce to grow their business they are supported by expert partners such as Daventry Volunteer Centre. Daventry Volunteer Centre supports residents of West Northamptonshire and provides intensive 1:1 support for anyone 19+ thinking about or looking for work. As well as traditional employment support such as CV writing and help with training and development costs, they offer a range of tailored, supported volunteer opportunities to directly help residents on their employment pathway. As well as this, they help broker jobs between people and employers to help take some of the stress of job searching away.

In addition, our Anchor Institutions Network are some of the largest employers in Northamptonshire and have the potential to create significant opportunities for our local population and are committed to reducing unemployment. With the recent formation of a collective network, the Anchor Institutions are hoping to provide more opportunities for our residents to gain meaningful work with a focus on ensuring employment is accessible and sustainable to all groups of people with different backgrounds and needs.

2019 INCOME DEPRIVATION DOMAIN OF THE IMD IN WEST NORTHANTS



HOUSING AND HOMELESSNESS

Housing conditions have a clear impact on a person's physical health, in addition to the availability and security of housing has on a person's mental health and wellbeing. A safe and settled home "is the cornerstone on which individuals and families build a better quality of life, access services they need and gain greater independence."²³

The recent Census found that regarding housing tenure, 14.4% of households in West Northants had social landlords (17.1% England), 19.2% private landlords (20.6% England) and the remainder 66.4% were owner-occupied properties (62.3% in England). It is important to note that this varies hugely across West Northants, with 60% of households in the St Michaels MSOA of central Northampton privately renting (2021 Census).

Private rental prices paid by tenants in the East Midlands rose by 4.3% in the 12 months to June 2022, being the highest annual growth in private rental prices in the UK²⁴. In West Northants, the highest monthly private rents were in South Northants in 2021/22 (£895), which was above both the Northamptonshire (£750) and England averages (£800)²⁵.

Summary of monthly private rental prices (1 October 2021 to 30 September 2022)

Area	Lower range (£)	Median (£)	Upper range (£)
Daventry	700	800	950
Northampton	670	750	870
South Northants	775	895	1,085
Northamptonshire	650	750	875
England	610	800	1,100



23. The Health Foundation. How does housing influence our health? . www.health.org.uk/infographic/how-does-housing-influence-our-health
 24. ONS. Census 2021. www.ons.gov.uk/economy/inflationandpriceindices/bulletins/indexofprivatehousingrentalprices/previousReleases
 25. ONS. Census 2021. www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland



West Northamptonshire is also an expensive place to buy property with house prices nine times that of the average household incomes in 2021, which is similar to the England average of 9.1 but higher than the East Midlands average of 7.6²⁶.

Rising housing costs can lead to rent arrears and people being evicted from their property. People and households at risk of being evicted and made homeless or households currently unintentionally homeless are entitled to support from the local authority. In 2020/21 there were 2,045 households in West Northamptonshire that fit into this category – equivalent to 12 in every 1,000 households, the fourth highest rate in the region behind the three large cities of Leicester, Nottingham and Derby. In addition to the households that approach the council for support with homelessness we know there are many others experiencing having to sleep on friends' and family's sofas to get by, known as "hidden homeless". In 2018/19 it was estimated 1.2% of households in the region were supporting sofa surfers.²⁷

A much smaller group of people but with often much more complex needs beyond those of poverty and homelessness, are those who are rough sleeping. Many people who experience rough sleeping have overlapping poor mental health, substance misuse needs and experience of the criminal justice system, as well as other traumas that are worsened by the experience of sleeping on the streets. This is the extreme end of poverty – destitution – and has an extreme impact on health and wellbeing; the average age of death of people who experience rough sleeping is 45 for men and 43 for women²⁸.

Example projects

Poor housing, difficulty in obtaining and sustaining a tenancy, sofa surfing, homelessness and associated housing related matters have been identified as key factors in limiting people with a drug and alcohol misuse issue from entering or sustaining treatment or recovery programmes.

The Positive Housing and Safe Environments (PHaSE) project, delivered by Bridge Recovery Service in partnership with Orbit Housing, provides access to 20 properties across the county for people in recovery from substance misuse.

These properties are spread across communities, some are individual houses, and others are in blocks of general needs flats. There is nothing to indicate that these properties are any different from other properties, and the allocation of accommodation is not based on current town/district of current residence so that a person may choose to move between locations (within the county) to make a 'new start'.

PHaSE is not a forever home. Tenants are given an Assured Shorthold Tenancy valid for two years, with the aim that the people housed through the project are able to move into their own independent accommodation at some point within this period.

Once someone has moved in, Bridge's recovery staff and peer mentors will tailor any support that tenants may need. All new tenants will be helped to settle in, and then will get the individual support they need to successfully move on to the next chapter.

26. Office for Health Improvement and Disparities (OHID). Public Health Profiles. <https://fingertips.phe.org.uk/>

27. GOV.UK. English Housing Survey 2018 to 2019. www.gov.uk/government/statistics/english-housing-survey-2018-to-2019-sofa-surfing-and-concealed-households-fact-sheet

28. ONS. Census 2021. www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/deathsofhomelesspeopleinenglandandwales/2021registrations#:~:text=Numbers%20of%20homeless%20deaths,of%20658%20to%20824%20deaths.

PLACE-BASED APPROACHES

Actively involving citizens and strengthening community assets is a key strategy in helping to improve the health and wellbeing of the poorest residents and seldom-heard groups, reducing health inequalities. This year, our Public Health and Communities Teams launched the 'Well Northants' programme towards addressing this. Community development workers were embedded within local communities with high deprivation (using IMD data), or shared experiences through inclusion health groups, to better understand local needs and assets, and support them to develop interventions to improve individual and community wellbeing. The model adopted for this work is based on the Well Communities Programme, running in London. This uses a framework known as the CSEAD process: Community and Stakeholder Engagement in needs Assessment and Local Programme Co-Design. This begins with talking directly to residents through street interviews, ensuring that their views are heard and that they are involved from the outset. Intelligence gathered from residents is then used to conduct a needs assessment, followed by a coproduction workshop with the community and stakeholders to develop an action plan.

Community development workers are working with local people and partners to develop neighbourhood action plans and to implement the actions and monitor progress. An example of a local activity underway is the empowerment of a group of vulnerable women, some of whom are involved in sex work, to set up their own peer led beauty and support session, with a team of volunteers accessing training on a pathway to employment. The aim is to provide a safe space for vulnerable women to come together and feel good about themselves, and to provide an opportunity to get to know other people with the same lived experiences. The volunteers involved have reported this has had a positive impact on their wellbeing, confidence and self-esteem and provided them with opportunities previously unavailable to them.



RECOMMENDATIONS FROM 2020-2022 DPH ANNUAL REPORT

	Recommendation	Action taken
1	The exploration and delivery of health-related messaging with a sense of inclusivity.	In 2022/23 there was a significant focus on achieving inclusive health-related messaging throughout all of our communications, i.e. with regards to the information that we provided, as well as the methods we used to share it. This was achieved through a broad programme of engagement with diverse communities (including those with shared ethnic identity as well as communities of shared interest e.g. those with a disability). This engagement work is helping us to ensure our future communications are tailored to the needs of these communities.
2	The continuation of collaborative working alongside other public and voluntary services to ensure the safety and wellbeing of the population in North and West Northamptonshire.	We have worked collaboratively with a range of partners to deliver health and social care interventions such as; vaccination, health screening, training, incident and outbreak management and wider support to extremely vulnerable groups who have been adversely affected during the Covid-19 pandemic. This has included distributing financial support to families of children who receive free school meals, household support fund and physical support to clinically extremely vulnerable people during lockdown. Partners include; local and regional health partners, voluntary agencies, faith groups, local businesses and workplaces, UK Health Security Agency (UKHSA) and other regional and national government agencies, community organisations, event organisers and other local authority teams.
3	The Health and Social Care system across North and West Northamptonshire should further utilise data and intelligence about the impact of Covid-19 and other health-related matters to inform services or initiatives and meet the needs of local communities.	<p>Local surveillance on case rates, testing, incidents and outbreaks, vaccination, hospital admissions, mortality and staff absence, was benchmarked against regional and national intelligence, and used to inform local recommendations through briefing of multi-agency system partners of the LRF and forums, including the Contain Management Group, Covid-19 Health Protection Board, Strategic Coordinating Group, Tactical Coordinating Group, Oversight and Engagement Board and Cabinet briefings. Weekly briefings were also delivered to the local media informing them of the situation in Northamptonshire and included implementing improvements to address gaps identified. This helped to manage case rates in Corby, Kettering and Northampton when they featured in the top 20 areas with the highest case rate nationally and managing outbreaks in local settings in the national picture.</p> <p>We are in the process of collating data to inform our local view on the effect of Covid-19, from local, regional and national benchmarking and county-wide surveys. The intelligence will be analysed and used to produce a comprehensive impact assessment, which will inform the delivery and development of services which will address the ongoing issues relating to Covid-19 and other health related matters during the recovery phase.</p>

RECOMMENDATIONS FROM 2020-2022 DPH ANNUAL REPORT

	Recommendation	Action taken
4	<p>Priority should be placed on addressing the health inequalities exacerbated by the pandemic within and across the two unitary areas by ensuring access to services for all, particularly those who are rurally or socially isolated.</p>	<p>Addressing health inequalities is a priority set out in the Integrated Care Northamptonshire (ICN) Strategy. The strategy sets out 10 Live Your Best Life ambitions and the place-based approach we will take to achieve these. We are taking a joined-up approach across all the organisations and services involved in supporting our population and communities. This will be through a new very local approach with our communities central to our operating model – our Local Area Partnerships (LAPs’).</p> <p>The ICN finalised the Health Inequalities Plan in July 2022 which sets out the system ambition to address health inequalities and the approaches required to achieve that. A Health Inequalities sub-group of the Population Health Board has been established to coordinate and have oversight of the range of work across the system that will achieve this ambition. Health inequalities funding from NHSE has also been allocated to addressing health inequalities, and a process of identifying projects that align with the health inequalities plan is underway.</p> <p>Other specific programmes of work with reducing inequalities at the core include:</p> <ul style="list-style-type: none"> • Well Northants programme - using an asset-based community development approach to work with communities most vulnerable to health inequalities to improve their health and wellbeing, using participatory budgeting processes to involve communities in decisions about how to allocate funding to projects • the Northamptonshire Anchor Network brings businesses and public sector organisations together to commit to improving health and wellbeing outcomes for our local communities by empowering the next generation, providing employment opportunities and investing locally.
5	<p>Investment in services which improve physical and mental health and wellbeing of the local populations which are key to supporting the recovery from the pandemic and the future health of the population.</p>	<p>Over the past year there has been increased investment in healthy weight programmes. In addition to the Public Health funded weight management services (offered by Slimming World, Northampton Town Football Club and Solutions 4 Health), a grant from OHID was used to offer grants to local organisations to deliver targeted weight management services to address inequities in access to existing services and reach people from minority ethnic groups, the most deprived parts of the county, men, people with mental health conditions and people with learning disabilities.</p> <p>Public Health also funded a new service to promote growing and cooking healthy food, delivered through the Hope Centre in the West and Groundwork in the North. Public Health are also conducting a review of physical health pathways and services with a view to increasing physical activity levels and building it into treatment pathways.</p> <p>Stop smoking services continue to increase their reach year on year, with 3056 quit dates set in 2021/22 and 62% of these achieving a quit at 4 weeks. Tobacco Dependency Advisors are now working in Northampton General Hospital and Kettering General Hospitals and maternity services using funding from NHSE as part of the Long Term Plan tobacco control priority.</p>

RECOMMENDATIONS FOR THE 2022 REPORT

1. Continue to deliver urgent support to those struggling right now – ensuring good access to rights advice and easy access to hardship support.
2. Ensure that the impact of financial stress on mental health is understood and addressed.
3. Continue to build on the collaborative working to ensure partnership working is at the centre of anti-poverty action including the wider Integrated Care System constituent organisations.
4. Take place-based and asset-based approaches linking with the work of the emerging Local Area Partnerships.
5. Develop longer-term strategic approaches to reduce and prevent poverty and its impacts, focusing on:
 - Fuel poverty and warm homes
 - Sustainable food
 - Skills and access to employment
 - Homelessness and rough sleeping.
6. Keep learning and reflecting and ensure that evaluation results in improved outcomes.

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Page 490

Appendix C Progress being made against the 32 commitments.

Priority 1 - Support people who are struggling in poverty right now

Priority	Ambition	Commitment	Progress
<p>Priority 1 Support people who are struggling in poverty right now</p>	<p>Commit resource and funding to deliver the strategy and resultant action plan, focusing on those most in need.</p>	<p>Map existing resource/offer and identify gaps.</p>	<p>Ongoing. Communities team have begun asset mapping - Local Infrastructure Organisations currently sense checking where we have got to – providing high level details of each of the assets mapped in readiness for website/app/directory of services development. Warm Welcoming Spaces impact analysis will help inform this.</p>
		<p>Understand needs of underserved communities.</p>	<p>Ongoing. Poverty Truth Commission funded to continue to gather lived experience, feeding into the development of the action plans/delivery of the strategy.</p>

Priority	Ambition	Commitment	Progress
<p>Priority 1 Support people who are struggling in poverty right now</p>			<p>Community Engagement network mapped – against specific groups, including vulnerable groups and against the LAP areas.</p> <p>Engagement with specific minority communities has begun e.g. non moored boating communities.</p> <p>Warm Welcoming Spaces impact analysis on minority communities is helping to shape wraparound services.</p> <p>Task and finish group has delivered recommendations on approach to immigration support and advice.</p>
		Fund VCSE organisations effectively.	<p>Ongoing.</p> <p>Warm Welcoming Spaces Summer and Winter Grants programme.</p> <p>Capacity funding allocated to VCS HSF 3 distribution partners.</p> <p>Funding approved for the commissioning of the Community Training Partnership.</p> <p>Longer Term funding being put into place – through existing direct grants.</p>

Priority	Ambition	Commitment	Progress
			Grant framework approved by Cabinet – 11 April – includes a discretionary grant pot, Social Action/Volunteers pot, Community Cohesion Pot.
		Target those at highest risk of hardship.	Ongoing. Household Support Fund - distribution to residents and investment in foodbanks and food Larders.
	Improve communication and awareness of information and support for those who are in need.	Develop communications strategy.	Complete. Cost of Living webpage and promotion via cards/leaflets – regular use of social media and promotion of support through community networks e.g. Warm Welcoming Spaces, social prescribers, VCS partners etc.
		Ensure awareness and easy access to services/offers.	Ongoing. See above.

Priority	Ambition	Commitment	Progress
	Increase access to affordable credit, free welfare and debt advice.	Invest in advice services.	Ongoing. Money and Debt Advisors one year (23/24) funding in place for additional accredited advisors (4.4 FTEs). Money and Debt Transformational Change Team working towards long term solutions.
		Work with providers of rights advice services to improve access.	Ongoing. Community Training Partnership was awarded in March 2023 for a 2 year period to The Hope Centre and Community Law Services. Warm Welcoming Spaces Wraparound approach.
		Enhance the awareness of affordable credit and savings options.	Requires further action: Money and Debt Transformational Change Team working to 3 workstreams: <ul style="list-style-type: none"> 1. Internal Restructure 2. VCS Contracts 3. Pathways for residents

Priority	Ambition	Commitment	Progress
			Business case currently being prepared to fund a new post of Financial Inclusion Officer, supporting the delivery of the change team's work, and providing wider strategic direction around financial wellbeing.
		Review the Council's debt collection practices.	

Priority 2 - Preventing people from falling into poverty in the first place

Priority	Ambition	Commitment	Progress
<p>Priority 2 Preventing people from falling into poverty in the first place</p>	<p>Commit resource and funding to deliver the strategy and resultant action plan, focusing on those most in need.</p>	<p>Pay WNC directly employed staff above RLW.</p>	<p>Complete.</p>
		<p>Encourage employers in WN to pay RLW.</p>	<p>No direct actions taken - but there are 39 accredited real living wage employers in West Northamptonshire (as at July 2022).</p>
		<p>Ensure people receive benefits entitled to.</p>	<p>Ongoing. Money and Debt Advisors one year (23/24) funding in place for additional accredited advisors. Money and Debt Transformational Change Team working towards long term solutions.</p>

Priority	Ambition	Commitment	Progress
<p style="text-align: center;">Priority 2 Preventing people from falling into poverty in the first place</p>	Commit resource and funding to deliver the strategy and resultant action plan, focusing on those most in need.	Promote social mobility by raising skills and improving access to training.	Ongoing. Fledgling Learning and Skills Consortium created in partnership with key stakeholders including University of Northampton, Northampton College, Adult Learning Services - to map existing offer of courses to raise skills and training. Anchor Institutions working in partnership to break down barriers for Care Leavers' entering employment.
	Meet housing need with good quality social housing and enable the private rented sector to be an effective housing contributor.	Develop a new WN housing strategy.	Complete.
		Support development of new homes.	
		Ensure rent levels support local housing need.	
		Encourage energy efficiency measures in private rental sector.	

Priority	Ambition	Commitment	Progress
Priority 2 Preventing people from falling into poverty in the first place		Develop new homelessness and rough sleeping strategy.	Ongoing. Strategy under development.
		Improve alternative housing options and quality private rent.	
	Build resilient and supportive communities through investment in services that support health and social wellbeing, working in partnership with communities to develop local assets and build community resource.	Listen to residents and facilitate community action.	
		Promote place-based approaches at neighbourhood level.	Ongoing. Well Northants Programme – asset/strength based community development – community development officers attending LAPs. Neighbourhood working groups established in priority areas.
		Asset-based approaches - build on strengths of communities.	As above.
		Engage in genuine co-production.	Ongoing. Well Northants Programme – World cafes, community engagement, development of co-produced action

<https://www.northamptonchron.co.uk/news/politics/more-northamptonshire-firms-sign-up-to-real-living-wage-as-inflation-hits-101-percent-amid-cost-of-living-crisis-3808686>

Priority	Ambition	Commitment	Progress
			<p>plans, participatory budgeting programme. Task and finish group has delivered recommendations on approach to immigration support and advice.</p>
		<p>Ensure access to health improvement/preventative services.</p>	
		<p>Work with those with experience of poor MH to support needs.</p>	<p>Ongoing. Happy Café project promoted and linked in with the Warm Welcoming Spaces. Mental Health identified as a major need through the Warm Welcoming Spaces planning for 23/24. Mental Health Training Framework, Promoting MH employment support offer across Supported employment, primary care and Public Health – being developed. Mental Health needs assessment undertaken with our foodbanks and food larders.</p>

Priority 3 - Continue to influence the government and other national organisations to get a better deal for West Northamptonshire

Priority	Ambition	Commitment	Progress
<p>Priority 3 Continue to influence the government and other national organisations to get a better deal for West Northamptonshire</p>	<p>Engage members of parliament and central government departments, to advocate for equality and fairness to get the best deal for our communities.</p>	<p>Continue to work together across agencies/political parties.</p>	<p>Ongoing. Cross party Anti-Poverty Oversight Board. operates well. Health and Wellbeing Board engaged. LAP boards in place. Task and finish group - immigration support and advice.</p>
		<p>Continue work of oversight group.</p>	<p>Ongoing. The Anti- Poverty Strategy Oversight Board meets regularly to drive forward delivery of the strategy and its supporting action plan. It has met more frequently than originally envisaged due to the cost of living crisis.</p>
		<p>Develop campaign to highlight dangers high-cost credit, promote responsible lending.</p>	

<https://www.northamptonchron.co.uk/news/politics/more-northamptonshire-firms-sign-up-to-real-living-wage-as-inflation-hits-101-percent-amid-cost-of-living-crisis-3808686>

Priority	Ambition	Commitment	Progress
	Utilise the evidence base for action and share this to lever in funds both locally and nationally.	Work with University of Northampton to evaluate and undertake research.	
		Share learning on local best practice.	<p>Ongoing.</p> <p>Attendance and contribution toward seminar - New Local/JRF workshop 2 on designing out deep poverty and destitution.</p> <p>Attended and contributed towards Joseph Rowntree Foundation Consultation on development of rethinking how tackle poverty.</p> <p>Contributed towards and attended launch of national report 'It's a no-brainer': Local authority funding for immigration legal advice in the UK' by Jo Wilding.</p> <p>Best practice learning shared with Newham Council, Wokingham Borough Council, Frimley ICS.</p>
		Create local area profiles.	<p>Ongoing.</p> <p>Local Area Profiles created as part of the LAP development.</p>

Priority	Ambition	Commitment	Progress
		Learn from and act on recommendations of Poverty Truth Commission.	Ongoing.

Appendix D – Year 1 Spend

Project	Summary	Length	2022/23	2023/24	2024/25	Total
Warm Welcoming Spaces Grant	Grants of £500-£1500 to create / develop WWS for VCS / Libraries	3	£60,000	£60,000	£60,000	£120,000
Community Training Partnership	Creation of social welfare alliance to deliver training to front line workers and volunteers to develop / improve referral pathways	2	0	£85,000	£85,000	£170,000
HSF3 - Building Capacity in VCS	Provision of £100k support to build / strengthen capacity in the VCS network to deliver HSF 3	1	£100,000	£0	£0	£100,000
HSF3 - additional food bank capacity		1	£24,235	£0	£0	£24,235
Money and Debt Advisors	Provision of 4.4 debt advisors for 12 months based with the VCS to provide debt support for residents.	1	£0	£180,000	£0	£180,000
Feasibility Study	Study to explore feasibility of sustainable heat network in Northampton	1	£0	£60,000	£0	£60,000
			£184,235	£385,000	£145,000	£654,235

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**West
Northamptonshire
Council**

Anti-Poverty Strategy and Action Plan 2022/23 – A Year in Review

**Overview and Scrutiny Committee – 3rd
May 2023**

Anti-Poverty Strategy

Overview

- **April 2022** – Anti-Poverty Strategy signed off by Cabinet following its co-production by an Oversight Group comprising a range of stakeholders across the VCS, Primary Care, the Council, and education partners.
- In addition to the data, we listened to the lived experiences of people in poverty. The Poverty Truth Commission has provided the opportunity to listen and learn from the lived experiences of people in poverty. A website has been set up for the Poverty Truth Commission in West Northants poverty-truth.org.uk which is encouraging real life stories, from those with lived experienced of poverty. These case studies are coming from seldom heard groups within our communities, those that are vulnerable and those most in need.



Anti-Poverty Strategy

2022-2025



Three priorities were identified within our 3-year strategy:

Supporting people who are struggling in poverty now

Preventing people from falling into poverty in the first place

Continue to influence Government and other national organisations to get a better deal for our communities in West Northants

Our priorities are supported by 8 strategic objectives and 33 commitments, high level ambition statements that collectively support the shared vision and are aligned to the 3 priorities.

June 2022 – Ambitious Action Plan developed – over 100 Actions. Oversight Group agree the need to focus on **must do actions** for year 1

July 2022 - implementation begins

The strategy is underpinned by some key principles, that we collectively work to:

Key Principles

	Principle
1.	A true partnership between the VCS, Primary Care, WNC ,and other partners will enable this to work
2.	A communication and engagement strategy is vital
3.	Deliver against need in local and trusted settings across our urban and rural geography
4.	Utilise the emerging framework of the neighbourhood areas and link these actions with developments in the creation of the Integrated Care System in Local Area Partnerships
5.	Wraparound - develop broad multi-service models that may be wrapped around an initial primary concern such as the provision of food, primary care, or a key form of advice
6.	Joined up working - as recommended for the various consortium approaches – across long term food aid, debt, immigration support and advice, and learning and employment - will be essential
7.	Funding of local partners to deliver actions and build capacity and ensure local reach to most vulnerable
8.	Keep reflecting and maintain a ‘real time’ list of evolving key actions that we must continue to implement in priorities 1 and 2
9.	Provide a balance of alleviating immediate hardship and providing progressive solutions

Must Dos

Must Do	RAG Rating
Establish an APS Community Training Partnership: provide training for all frontline workers and volunteers (FLWVs) on the key social welfare issues in West Northants	GREEN
Household Support Fund: review the current method of allocating funding to ensure it is reaching those in severe hardship/ Work in partnership with The Food Aid Alliance for WN (FAAWN) - an alliance of foodbanks - and other food aid providers to enable partners to develop long term food aid to support those in severe hardship.	GREEN
Fuel poverty: Establish as a matter of urgency a cross sector fuel poverty working group identifying all possible interventions ahead of the 22/23 winter period.	GREEN
Money and debt: Review and expand the financial wellbeing service offer within West Northants.	GREEN
Immigration support and advice: Create a sustainable approach to address the shortfall in immigration support/advice to ensure all eligible residents achieve settled status/ Establish a task and finish group to move this work forwards urgently.	AMBER
Social mobility, employment and skills: Initiate and establish an emphasis on the development of a holistic approach to learning and employment for residents - forming a learning and skills consortium that delivers in local and trusted settings.	AMBER / RED
Communications: Create a range of approaches to communicate the availability of all support and services, plus public health and primary care provision to all partners working with residents.	GREEN

Household Support Fund

- The total expenditure for the 12-month schemes (HSF1 and HSF2) between October 2021 and September 2022 was **£5,459,156** . Over 60,200 households were supported during that period.
- A further **£2,599,628** was distributed to households between October 2022 and March 2023 via the HSF3 scheme. This funding is directed at **circa 16,000 households** who are experiencing extreme food and energy hardship over the winter period, of which:
 - Over £1m allocated to the **School Holiday Food Support Scheme**
 - £884k distributed to **residents working but receiving a low wage** (under net £400 income per week) via an online application portal. A payment, in 2 parts, of £250 is made directly into their bank accounts which can be put toward essential costs.
 - To reach as many vulnerable residents as possible a significant proportion of the HSF 2 and 3 funding rounds was awarded to the Northamptonshire Community Partnership for distribution by VCS partners.
 - In HSF 3 – 6009 vouchers to the value of £751,125 were awarded by 21 partners – see next slide
 - Over £240,000 was allocated to our Foodbanks via FAAWN
 - An additional £100k public health grant funding has been allocated for "wraparound" wellbeing support for those in receipt of supermarket vouchers via the voluntary sector

Household Support Fund 3 - Partnership with VCS

Name of organisation	Number of vouchers distributed
Daventry Food Bank	562
Northampton Hope Centre	1206
The McCarthy-Dixon Foundation	873
Weston Favell Foodbank	172
United African Association	1025
NPH - Happy To Help CIC	452
Shine CIC	376
Ramgarhia Board	35
Springs Family Centre	125
Peak Empower	81
Community Law	96
Right Resolutions CIC	82
Re:store	71
Food for Thought	502
Daventry Citizens Advice	25
West Northants Money Advice	59
Brackley Foodbank	59
Towcester Foodbank	60
SNVB	102
Braunston Heart	17
West Northants Customer Service	49

Household Support Fund 4

As part of the Household Support Fund (HSF) 4 scheme, West Northamptonshire have been allocated **£5,199,257** to distribute between 1st April 2023 and 31st March 2024.

As with previous tranches of HSF this fund is to be used is used to meet immediate needs and help those who are struggling to afford energy and water bills, food, and other related essentials, however in this latest tranche of funding there is provision to deliver advice services (though this should not represent a large proportion of the allocation).

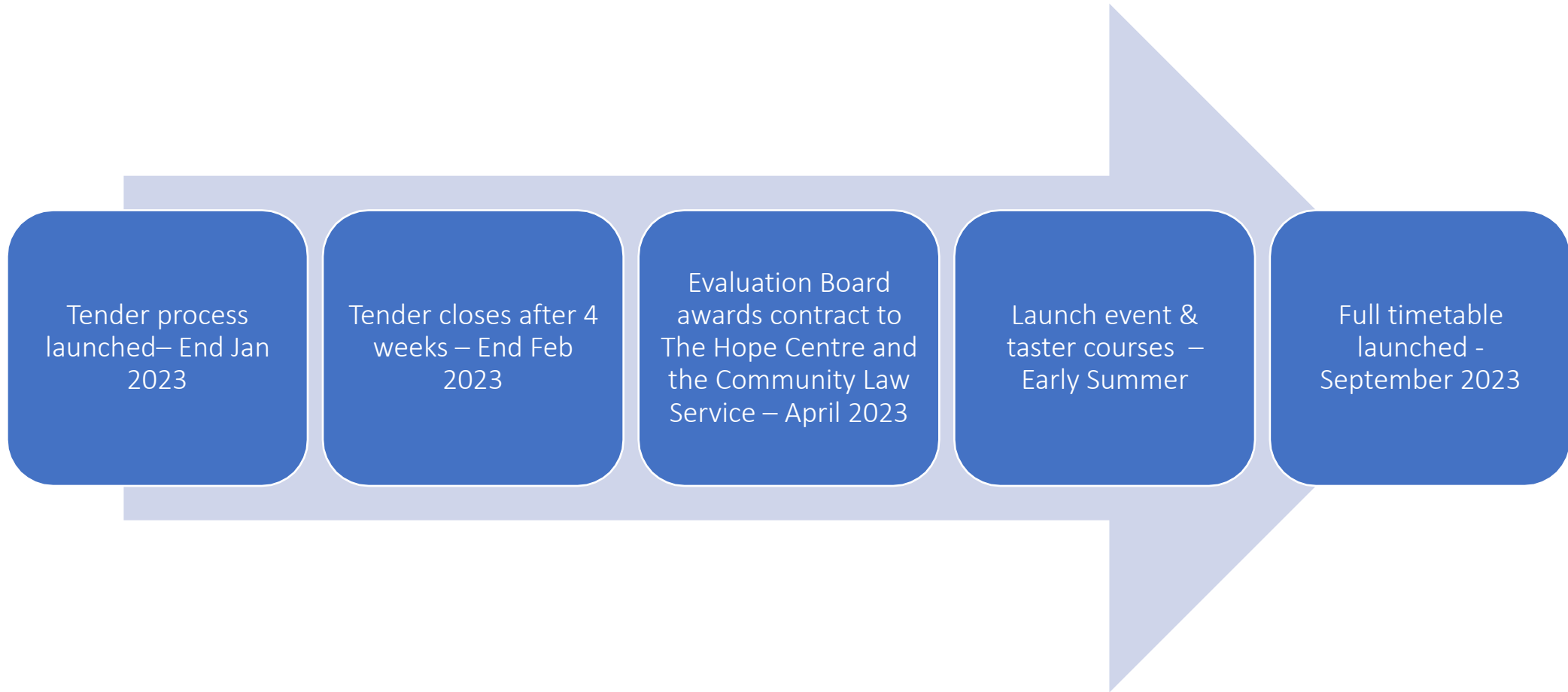
The proposed fund distribution in 2023/24 includes

- 47% allocated to holiday food support for low-income families with children (those eligible for free school meals)
- 32% in financial support to other vulnerable households or those experiencing significant hardship
- 16% in voluntary sector grants to support food aid, energy saving measures, and money and debt advice.
- The remaining 5% is allocated for administration.

Community Training Partnership

- The aim of the Community Training Partnership is to provide training for all frontline workers and volunteers (FLWVs) on the key social welfare issues in West Northants.
- FLWVs come from all sectors – and will include social prescribers, colleagues providing support and advice for residents from the VCS and council, colleagues running food banks and food larders, members of faith settings and so on.
- Key social welfare issues will include housing and homelessness, access to immigration support and advice; cost of living/money and debt issues.
- The contract for the delivery of the programme was awarded in April 2023 for a two year period to The Hope Centre and Community Law Service.





Warm Welcoming Spaces – The Journey

- Steering Group stood up 25 Sept 2022 in response to the Cost of Living Crisis
- £180,000 funding secured to develop / enhance Warm Welcoming Spaces
- Online Cost of Living Hub and Online Warm Welcoming Spaces register developed - live Nov 2022
- WWS Grants Programme live - Nov 2022
- WWS toolkit to support promotion of individual offers delivered - live Nov 2022
- Grant funded 45 organisations between Nov 2022 – March 2023 (50% of our registered spaces)



Headlines Outcomes – Jan to Mar 2023

Key Metric	Outcome
No of Warm Welcoming Spaces registered online	96
No of attendees (Grant Funded Spaces)	52,932
No of clients referred on to wraparound services	3,371

£1.89

The cost of each attendance

Bugbrooke Parish Council

One of our newer regular visitors is a partially sighted elderly man with a guide dog. His wife died at the end of last year so he now lives alone. He really enjoys coming to the warm room to chat to friends, he is sometimes tearful, but his friends are very supportive. He is determined to learn to cook for himself and has been getting advice from some of the other attendees.

Daventry Volunteer Centre

B & R (friends) come into the café more regularly since our warm space has been open and have now joined several of our social activity sessions and have made new friends. Both live in a sheltered scheme in Daventry and come into the New Street Centre, we encouraged R to see their GP when he was complaining of memory issues. We have given them both a blanket to take home donated to us by the Town Council. They were thrilled.

Welcoming Spaces – next steps

Concept and implementation into Welcoming Spaces

- Explore survey and performance results and lessons learnt, map needs including by locality, attendee age group, health conditions etc providing an evidence base to inform next steps - April / May 2023
- Event in May 2023 to celebrate success of spaces in partnership with Community Training Partnership

Grants Programme

- In response to evidence of continued need of Welcoming Spaces (cost of living, tackling social isolation & supporting mental health), small grants programme to be rolled out to spaces to cover summer period
- Planning for Winter 2023/24 using best practice learnt from the 2022/23 programme

Wraparound Services

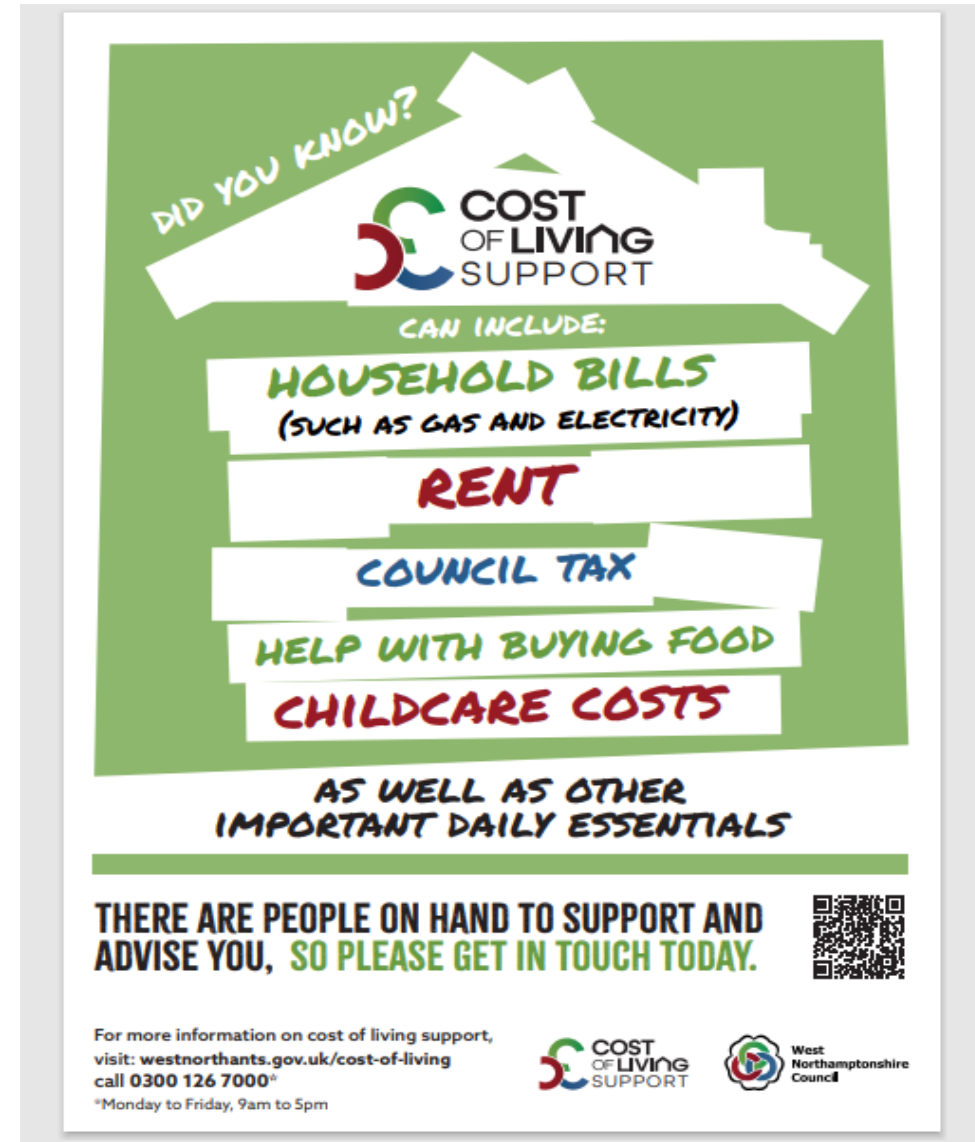
- Act as catalyst to bring Welcoming Spaces together wraparound services driven by needs analysis
- Work with our local infrastructure organisations to expand offer – ensure reach to VCS groups
- Align with the ongoing asset mapping work and LAP development

Serving our rural communities

- Use the principles of **Rural Proofing for Health** toolkit to identify future need and shape
- Pilot Northamptonshire ACRE Rural Proofing for Health Toolkit - **Rural Mental Health Matters**

Money and Debt – Emergency Response

- £180,000 funding proposal awarded to 3 VCS partners to provide 12 months (of 4.4 FTEs) emergency Money and Debt Advisors in response to the escalating cost of living crisis demands
- Providers: Community Law Service, Citizens Advice North Oxon and South Northants, Citizens Advice Daventry
- Go live: early summer 2023
- WNC Transformational change team planning new joined up approach for delivery from late 2023 onwards – holistic focus on the provision of debt and money advice provided by the VCS and internal services within WNC



DID YOU KNOW?


COST OF LIVING SUPPORT

CAN INCLUDE:

- HOUSEHOLD BILLS**
(SUCH AS GAS AND ELECTRICITY)
- RENT**
- COUNCIL TAX**
- HELP WITH BUYING FOOD**
- CHILDCARE COSTS**

AS WELL AS OTHER IMPORTANT DAILY ESSENTIALS


THERE ARE PEOPLE ON HAND TO SUPPORT AND ADVISE YOU, SO PLEASE GET IN TOUCH TODAY.



For more information on cost of living support, visit: westnorthants.gov.uk/cost-of-living call 0300 126 7000*

*Monday to Friday, 9am to 5pm

COST OF LIVING SUPPORT



This is a proposal to work within the transformational change team's work – business case currently being written – the purpose of the role is to:

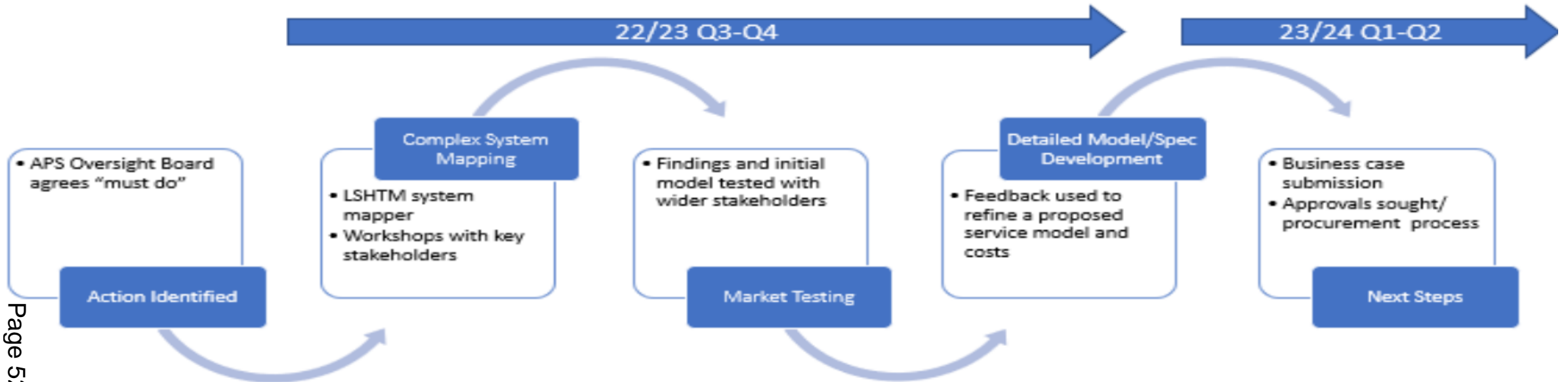
- **Increase our resident's financial capability and resilience** through direct support, education, and awareness – and carefully managed distribution of hardship funds.
- Provide cross sector leading services to help our residents develop **skills to manage their finances and access mainstream financial services.**
- Build **strategic and cross sector partnerships that help deliver pioneering solutions** to help communities to overcome problems of debt, employment and housing rights, poverty and exclusion.
- **Identify all sources of hardship funding and other support funds/ provisions to enable WNC and partners to target and support those in severe hardship.**

Immigration Support and Advice

The Anti-poverty Strategy notes that:

People with no recourse to public funds (NRPF) including vulnerable migrants are at high risk of experiencing poverty including destitution:

- Four times more likely to be behind on at least one essential bill (81% vs. 20% of general population)
- Almost half (48%) report living in overcrowded accommodation and 1 in 5 (18%) have experienced homelessness or housing insecurity.
- Three-quarters (75%) have suffered from at least one negative consequence of having NRPF, including going hungry or cold



Proposed 'Hub and Spoke' Model

Local Support

A network of 5 to 10 local immigration support and advice hubs across West Northamptonshire

Located in greatest areas of need – greater concentration in LAPS with the most vulnerable residents – e.g. N4

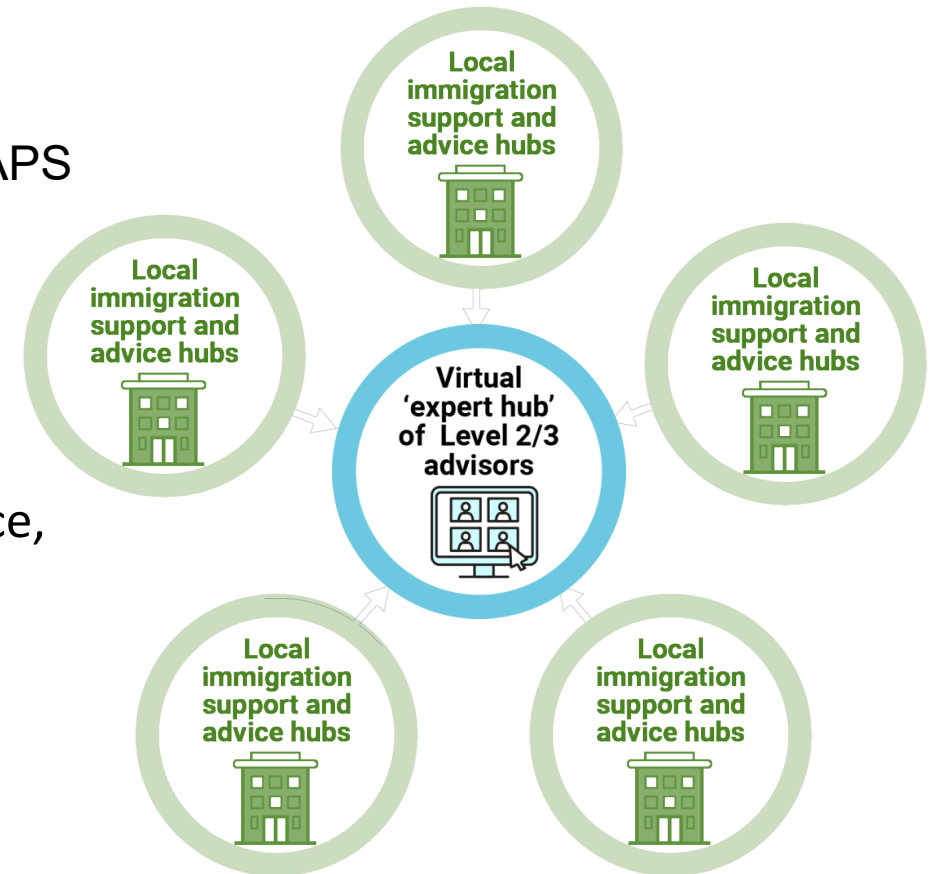
Providers of these hubs will likely be VCS partners

Expert Hub

Free level 2 and 3 accredited advice and casework

Offering a mixed, flexible delivery model – of community, office, and online options

Operating with formal referral protocols



The clearest hard financial benefits are from bullets 1-4

LESS DIRECT FOR LAS



1. Reduced (potential) demand of families supported (under S17)



NRPF families are assessed and supported under s17 of the Children Act 1989. The majority are referred at crisis point and at which point their grant of leave to remain has expired and accordingly they become unlawfully present in the UK.
Housing + subsistence for one family of 3 /4 with 2 very young children = £623 per week = £32,396 PA

2. Housing provision to adults – from rough sleeping to other accommodation help

3. Schools gaining pupil premium



Undocumented children do not receive the £1345 (primary school), £955 (secondary school) pupil premium. In other words, schools are losing substantial sums of money.

4. NHS acute help

5. Gain taxes (people allowed to work, or working more)

If we help 500 primary school students achieve 'enhanced status' = £672,500 PA

6. Social cohesion/capital



So important/ difficult to quantify.

- Initiate and establish an emphasis on the development of a holistic approach to learning and employment for residents - forming a learning and skills consortium that delivers in local and trusted settings
- Initial meeting of stakeholders to held December 2022
- Working group established to map the initial offer and how to showcase it
- Progress has been slow and this 'Must Do' needs urgent attention from May 2023 onwards

- Good progress however being made on Care Leavers:
 - Mentoring proposal currently being explored
 - Care Leavers and Anchor Institutions – a session is being held on 4th May to support to support anchors to become more inclusive when recruiting and supporting care leavers.

Achieved so far:

- Cost of living resource hub live on WNC website with accompanying promotional comms (www.westnorthants.gov.uk/cost-of-living)
- Social media campaign successfully launched and shared on a rolling basis through WNC and partner channels
- A toolkit created for Warm Welcoming Spaces and shared with partners for use
- Approx. 80 community groups/organisations distributed cards/posters to over 40,000 residents across the West signposting to the CoL resource hub and phone number
- Media coverage received from local media outlets signposting to WWS and CoL hub

Next steps:

- Translation of materials including videos and document handouts – includes filming of community organisations / leaders and supports signposting to key information
- Revised comms plan to be developed in alignment with HSF4 distribution looking at key milestones and/or activities for consistent promotion until March 24
- Comms to be revised in alignment with welcoming spaces next steps
- Review and update CoL resource hub and WWS map to ensure up to date and accurate



HSF Voucher Distribution Partners

Name of organisation
Daventry Food Bank
Northampton Hope Centre
The McCarthy-Dixon Foundation
Weston Favell Foodbank
United African Association
NPH - Happy To Help CIC
Shine CIC
Ramgarhia Board
Springs Family Centre
Peak Empower
Community Law
Right Resolutions CIC
Re:store
Food for Thought
Daventry Citizens Advice
West Northants Money Advice
Brackley Foodbank
Towcester Foodbank
SNVB
Braunston Heart
West Northants Customer Service

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11th July 2023

Cabinet Member for Finance: Councillor Malcom Longley

Report Title	Energy Procurement Risk Management Strategy 2024-28
Report Author	Marouane Azennoud, Energy Manager, Marouane.Azennoud@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Cath Whitehead	14/06/2023
Chief Finance Officer (S.151)	Martin Henry	14/06/2023
Other Director	Stuart Timmiss, Executive Director Place, Economy & Environment	15 June 2023
	Simon Bowers, Assistant Director Assets & Environment	16 June 2023
Communications Lead/Head of Communications	Becky Hutson	14/06/2023

List of Appendices

None

1. Purpose of Report

- 1.1 To inform Cabinet of the success of the existing energy contracting approach across the Council and to seek approval for the approach outlined for securing new energy contracts covering the period October 2024 to September 2028 including undertaking a procurement and award of such contracts.

2. Executive Summary

- 1.2 The reports presents the current energy procurement risk management strategy for 2021-24 which was inherited by WNC from the predecessor councils, what has been achieved and proposes the next steps in renewing the strategy for 2024-28.

3. Recommendations

- 3.1 It is recommended that the Cabinet:
- 3.1.1 Approves the recommended energy procurement risk management strategy.
- 3.1.2 Agrees that a procurement process should be commenced.
- 3.1.3 Delegates the responsibility for the procurement of new energy contracts and delegates the responsibility for the award of contract to the Executive Director of Place in conjunction with the Portfolio holder for Assets.

4. Reason for Recommendations

- 4.1 To accord with the Council's procurement requirements.
- 4.2 The option proposed aligns most closely with Council's 2030 Net Zero target.
- 4.3 The recommended course of action is the most cost-effective.

5. Report Background

- 5.1 The Council is currently using the LASER framework for procuring electricity and gas for the period 2020-24. The existing arrangement i.e., LASER utilities contracts were inherited from the former predecessor councils. In June 2007, the former Northamptonshire County Council (NCC) adopted the fully managed Energy Procurement Service provided by Kent County Council through their LASER Energy Buying Group. The other predecessor councils were also contracting using LASER but had different contract arrangements. LASER was founded in 1989 with a vision to help the public sector achieve the energy cost reductions made possible by newly deregulated gas and electricity markets. LASER has been purchasing energy flexibly since 2008, acting on behalf of over 200 public sector bodies, with contracts worth over £500m of energy per annum.
- 5.2 In 2021, the Council made a decision to novate the LASER utilities contracts for the former NCC to West Northamptonshire Council and merge the remaining LASER utilities contracts for the former Daventry District Council, Northampton Borough Council and South Northamptonshire Council under the main West Northamptonshire Council contract.
- 5.3 In 2021, the Cabinet approved purchasing 100% renewable electricity and gas. This has been incorporated in the existing LASER utilities contract.

- 5.4 Purchasing through LASER is permitted under regulation 22 of the Public Contracts Regulations 2006 with LASER operating as a central purchasing body as defined in the regulations. This ensures that the process fully complies with the requirements of the law. LASER also provides an invoice validation and checking service to the Council alongside the procurement activity as part of its fully managed service. This service ensures that verified, correct, quality assured bills are paid. This saves the Council from having to employ staff to validate around 200 electricity and gas invoices per month.
- 5.5 LASER's flexible procurement model aggregates the energy volumes of all customers. LASER closely monitors energy market prices and drivers, purchasing the energy requirements in multiple blocks over a period of time, prior to the point of use.
- 5.6 To spread market price risk and to avoid buying during periods of peak market pricing, the Pan Government Energy Project, now part of Cabinet Office, recommended that "all Public Sector organisations adopt aggregated, flexible and risk managed energy procurement" as the best solution to cost reduction in a complex and volatile market. Gas and electricity market prices are highly volatile and price movements of more than 100% are not unprecedented. The recommendation is to use an approved body with the focus on managed aggregated contracts. LASER is one of those approved bodies. LASER has approximately 20% more customers than it did four years ago.
- 5.7 Flexible procurement contracts are aimed at smoothing future price fluctuations and spreading our risk by pooling our energy requirements. This has protected the Council during the last energy crisis as the secured prices were below the government's threshold for receiving their financial support. In addition, this approach can support the Council with securing further environmental benefits first by identifying opportunities to enhance sustainable energy supply and second to facilitate using energy produced from large solar electricity installations arranged by the Council.
- 5.8 LASER has concluded an 'Open Procedure' procurement process, in accordance with the Public Contracts Regulations of 2015 for the tender and award of flexible energy contracts for the period from October 2024 to September 2028. This permits a public body to access LASER's frameworks and services without the need to run a separate procurement process to do so. Cabinet approval is now being sought to continue that flexible approach and to enter into a new four year procurement contract with LASER.
- 5.9 The Energy Procurement Risk Management Strategy has a strong strategic fit with the Council's vision and the foundations for the transformation of services, so they are sustainable into the future.

6. Issues and Choices

- 6.1 For the contract period from October 2024, LASER will be offering a menu of options for their clients. These comprise procurement baskets, contract periods and service delivery options and are described below and the recommendations summarised in 7.1 with their financial implications.

6.2 Procurement baskets

6.2.1 Flexible Purchase in Advance (PIA)

In this option, LASER aggregates the energy volumes of all customers who utilise the PIA basket option. All volume is purchased in multiple trades in advance of each 12-month supply period. The sum of all trades is used to calculate the aggregate wholesale basket price, which is applied to all customers in the basket. All non-energy costs (such as network charges and environmental levies) are then added to arrive at the delivered price to apply on invoicing for the following 12-month supply period. This price is firm for the 12-month period.

Recommendation: This is the option used in our current frameworks and is the one being recommended.

6.2.2 Flexible Purchase within Period (PWP)

In this option LASER aggregates the energy volumes of all customers who utilise the PWP basket option. Ordinarily, a proportion of the required energy volume is progressively purchased prior to each six month supply period and the remainder is purchased within the supply period. LASER has the option, should market conditions be appropriate, to purchase all energy requirements in advance of the six month supply period.

A reference price will be set to apply on invoices for each six month supply period. The reference price is based on the cost of all energy purchased prior to the supply period (the 'closed volume') and LASER's forecast of costs to purchase the remaining energy within the supply period (the 'open volume'). At the end of each six month supply period, once all energy requirements have been purchased, reconciliation takes place between the reference price applied to invoices and the final (achieved) purchase price.

Recommendation: This option is not being recommended as it carries significant risk to the Council in the event of high fluctuations in energy prices. The former NBC and DDC had this arrangement in place and their prices were at least 50% higher than the prices for the former NCC and SNC which had the PIA arrangement. As presented under 5.2, the Council made a helpful decision by moving them under the PIA arrangement just before the most recent energy crisis, this has helped the Council with mitigating the energy budget pressures.

6.2.3 Flex Set and Reset (FSAR)

Flexible Set and Reset allows customers to purchase a proportion of the required volume prior to delivery for each 6 month supply period. The remainder is then purchased within this period. Budget limits are agreed in advance, with commodity purchases closed out if market prices move above the pre-set limits. This option facilitates the sell back of volume if the market falls by more than the pre-set triggers. A mechanism is then in place to buy back prior to the point of use.

Recommendation: This is the option not being recommended as it carries significant risk to the Council in the event of high fluctuations in energy prices.

6.3 Contract Period

6.3.1 Four-Year Commitment

A tripartite agreement is signed between WNC, Kent County Council and the utility supplier. This provides authority to LASER to purchase all our electricity and gas supplies for a four year period (to September 2028). This gives LASER the widest possible forward procurement window in which to secure advantageous prices.

Recommendation: This is the same arrangement currently operated with LASER and is being recommended for the new contract.

6.4 LASER Services

6.4.1 Procurement Only Service (POSO)

This option provides access to LASER's procurement professionals, robust UK compliant tendering and purchasing procedures, market and industry information and control of non-energy costs. However, this service does not include bill validation.

Recommendation: This is not recommended as the Council would have to invest in resources for bill validations.

6.4.2 Fully Managed Service (FM)

This service is provided at an additional charge and is the service option currently adopted by the Council across the portfolio. In addition to items in POSO (above) the FM option also provides:

- Invoice validation of all accounts received. This ensure that customers are not invoiced for any charges if a supplier invoice fails LASER's internal checking system. Also, LASER becomes the biller instead of the utility suppliers.
- Consolidated billing: a new consolidated billing process was delivered under the current contract and this arrangement should carry over to the new contract. This allows the Council to pay 132 invoices instead of 2,460 per year. Additionally, the billing data received from LASER incorporates Council's cost centres information which facilitates recharging utility costs to services. This allows, in addition to consolidated billing, to efficiently manage the billing payment process and recharges and free up resources time to focus on other activities.
- Query management and resolution with utility suppliers. LASER's Customer Relationship Management (CRM) team deal with all queries with the utility companies on behalf of the customer. This facilitates the management of the contract as there won't need to be a direct relationship with the two electricity and gas suppliers.
- Online account management – including access to billing history, consumption, meter readings upload and query progress

- Smart meters rollout programme: LASER's CRM team will work with the Council to deliver a smart meter rollout programme. This will provide actual consumption data for billing purposes and result in minimal use of estimated billing and will prevent allocating resources to manually read the electricity and gas meters.

Recommendation: This is the same arrangement currently operated with LASER and is being recommended for the new contract.

6.5 Other providers

6.5.1 There are other public sector buying organisations (e.g. ESPO, CCS, YPO, etc.) who would satisfy the procurement regulation compliance requirements. However, very few of them offer access to multiple utility suppliers or the same range of managed services that LASER provide, and which were presented under the FM service or at the same level. As all of the buying organisations are procuring in the same wholesale market, using very similar strategies, any potential savings in commodity costs are likely to be negligible. The direct and indirect costs of changing procurement body for over 260 different supply points cannot be underestimated with the possible risk to service quality, account management and billing reliability.

6.5.2 Additionally, WNC has inherited a contract with ESPO for two street lighting supplies. This has allowed to benchmark the delivered electricity unit price (i.e., excluding renewable energy premium, Climate Change Levy (CCL), standing charges and contractor fees). The delivered unit rates for the largest street lighting unmetered supply we have under LASER is on average 1.5% cheaper than ESPO. Additionally, we have another six street lighting unmetered supplies with LASER and their delivered unit rates are cheaper by 20% than ESPO.

6.5.3 Finally, LASER secured utility prices are below market average. In fact, and as explained under 5.7, during the most recent energy crisis the Council did not receive any Government support towards electricity as the LASER secured price was below Government's support threshold. This was not the case for the two supplies under the ESPO contract which further demonstrates that the secured prices are higher than LASER prices. For gas, the Council received minimal support as LASER's gas secured prices were close to the government's support threshold.

6.6 The Council procures its own energy supply

6.6.1 Due to the size and scale of the Council's portfolio, this approach is not a viable consideration. It would require significant investment in staffing and systems. The prices received would be likely to be materially higher than using LASER or any large buying group.

6.7 Do Nothing

6.7.1 This is not a viable option as this would not comply with the Council's requirements for Procurement. Additional costs would arise as any supplies not part of an agreed contract would be liable to 'out of contract' penalty rates. Moreover, there will be high uncertainty around utilities costs as their prices are directly affected by market volatility.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The recommended approach is to enter into a new four-year contract on a purchase in advance model, with fully managed services. This reflects the current successful arrangement.

7.1.2 The current framework with LASER is currently delivering cost avoidance in procurement of energy worth £1.878m, as shown in Table 1.

Table 1: LASER cost avoidance

Description	Avoided cost £k pa
LASER’s purchasing performance – the prices achieved by LASER since the commencement of the framework are lower than the average market prices over the period.	1,666
Lower supplier management fees – reduced fees from your gas and electricity suppliers compared to buying as a standalone customer.	158
Shaping benefits – aggregating the volumes of multiple customers flattens the overall usage profile, allowing our traders to purchase at a lower price.	14
Entire market pricing – when LASER submits a bid to buy a block of energy, our suppliers are compelled to put this bid into the open market. This means we receive the lowest price anyone in the entire market is prepared to offer.	7
Flexibility of trading – our large energy purchase volumes mean we can buy larger blocks of energy over the market, which come at a discount to buying smaller blocks of energy.	2
Volume tolerance – LASER’s volume tolerances apply at the aggregated customer level (rather than individual customer level) minimising the risk of load variance penalties. As an example, no penalties were incurred for reduced usage during Covid.	1
Transparency of pricing – LASER validates supplier’s flexible prices and corrects any errors prior to opening bills being issued for each pricing period	30
Total	1,878

7.1.3 Contract Value

Following the recent utilities inflation, the existing energy contract has an approximate average annual value of £6.5m throughout the contract period (October 2021 to September 2024). The proposed new four-year frameworks (October 2024 to September 2028) will have an average annual value of around £6.0m (this excludes inflation, changes to the portfolio of buildings, and additional local solar generation, and is based on forecasted prices for October 2023). This is shown in Table 2.

Table 2: Likely overall contract values

Sector	£m			
	Electricity pa	Gas pa	Annual value	Potential four-year value

Council's building portfolio	3.182	2.013	5.195	20.780
Street lighting & traffic signals	0.905	-	0.905	3.620
Totals	4.087	2.013	6.100	24.400

The potential contract value includes green energy premiums and LASER fees. The fees we currently pay are detailed in the Table 3. The LASER fees are not expected to change for the new contract covering October 2024 – September 2028.

Table 3: Expected LASER fees

Commodity	Meter Type	Basket	Service Level	No of Supplies	Recovery	Green or Conventional	Total LASER Fees, £
Gas		PIA	FM	81	187.26	Green	15,168
Electricity	HH	PIA	FM	34	965.84	Green	32,839
Electricity	NHH	PIA	FM	50	157.02	Green	7,851
Electricity	NHH Q	PIA	FM	94	198.4	Green	18,650
Electricity	UMS	PIA	FM	11	166.24	Green	1,829
Total annual fees							76,336

7.1.4 The Council's electricity and gas budget for 2023/24 is around £4.6m for properties and £2.5m for street lighting and traffic signals. The total energy spend is thus around £7.1m per annum. The energy consumption for street lighting and traffic signals is set to decrease following the phased implementation of the LED replacement programme which is due to be completed by 2026. The energy budget is set every year and is based on the LASER secured prices for the 12 months ahead. As an example, in October 2023, the Council will receive the energy secured prices (fixed) for October 2023 to September 2024, and a forecasted price for October 2024 to March 25 based on the volumes of energy procured for the period. These prices are used to set the energy budget for financial year 2024/25.

7.1.5 Forecasting Inflation

Energy prices are affected by two main external factors: government policy and market forces. However, LASER have moved from providing long range forecasting as due to market volatility this is proving very difficult to forecast with any accuracy beyond a one to two year buying window. Additionally, LASER has also only just started purchasing for customers who have committed to the 2024 to 2028 Framework within the last few months and are still building up the amount purchased and as such would not be able to forecast for this period with any accuracy as this will change as additional customers commit.

7.2 Legal

7.2.1 Once procurement is finalised, the Council will need to sign a framework access agreement and two call-off contracts; one for electricity and one for gas.

7.3 Risk

- 7.3.1 The main risk associated with the proposal is that there is a reduction in contracted volumes from changes to the portfolio, and renewable energy and energy efficiency schemes coming on line. This risk would be mitigated by the contract allowing flexibility on volumes. The Council would need to share their high level project plan with LASER so that it amends its procurement strategy and volumes accordingly.
- 7.3.2 The risks associated with not undertaking the proposal are set out in the 'do nothing' option. Essentially the Council would be exposed to higher and volatile pricing.

7.4 Consultation and Communications

- 7.4.1 No specific consultation has been undertaken or is required. The Council would be able to communicate that it has continued to buy energy at the best prices reasonably obtainable, whilst verifying bills, and supporting transition to green energy.

7.5 Consideration by Overview and Scrutiny

- 7.5.1 None.

7.6 Climate Impact

- 7.6.1 In light of the Cabinet's decision in 2021 for purchasing 100% green electricity and gas to decrease Council's accounted carbon emissions. This has been incorporated in this procurement strategy and would mean the Council would nominally have zero carbon emissions from its property, street lighting, and traffic signal assets under the LASER contract. Of course, in practice the electricity and gas received reflect the normal UK mix of supplies, but the arrangement provides support for delivering renewable energy and thus further 'greening' the UK grids.
- 7.6.2 Additionally, the flexible procurement strategy will allow the Council to increase reliance on energy produced by its own renewable energy infrastructure once it becomes live and decrease reliance on grid energy. LASER provides a procurement service known as sleeved PPA (Power Purchase Agreement) that will allow the transport of energy from the Council's or partner's renewable energy parks to Council's assets.

7.7 Community Impact

- 7.7.1 There are no direct community impacts.

8. Background Papers

- 8.1 None

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11 July 2023

CABINET MEMBER WITH RESPONSIBILITY FOR HOUSING, CULTURE AND LEISURE - COUNCILLOR ADAM BROWN

Report Title	Housing Acquisitions Programmes
Report Author	<p>Joanne Barrett Assistant Director Housing & Communities; and Joanne.barrett@westnorthants.gov.uk Phil Morrison Strategic Finance Business Partner Philip.morrison@westnorthants.gov.uk</p>

List of Approvers

Monitoring Officer	Sarah Hall (Deputy Monitoring Officer)	03/07/23
Chief Finance Officer (S.151)	Audra Statham (Assistant Director, Finance – Accountancy)	03/07/23
Other Director	Lisa Hyde (Interim Director of Communities & Opportunities)	03/07/23
Communications Lead/Head of Communications	Craig Forsyth (Deputy Head of Communications)	03/07/23

1. Purpose of Report

- 1.1. To seek approval to increase the capital programme in the Housing Revenue Account for additional acquisitions, for the Council to participate in Local Authority Housing Fund Round 2 and to complete a procurement process to appoint a property purchasing/renovation service to support with acquisitions work programmes. This will include the Housing Revenue Account general acquisitions programme, Local Authority Housing Fund (LAHF) and a Single

Homelessness Accommodation Programme (SHAP) property acquisition and refurbishment project.

2. Executive Summary

- 2.1 The council has an acquisitions programme underway to purchase homes to increase our council-owned housing stock to meet local housing need and reduce pressures relating to homelessness and temporary accommodation costs.
- 2.2 In addition, the council will need to acquire some properties through the LAHF programme (both the initial round and the recently announced second round). Registered Provider partners were very willing to support the Council with delivery of the whole of this programme, but they have found it challenging to agree sales with developers in our area who are on-site building new properties. To achieve the LAHF programme targets it will be necessary for the Council to undertake some direct purchases from the open market. The total number of property acquisitions required for LAHF Round 1 is 30 and up to a further 10 for LAHF Round 2.
- 2.3 As outlined above, on 7 June 2023 the Department for Levelling Up and Housing and Communities (DLUHC) announced a second round of the LAHF (R2). This funding is to support local authorities to increase their stock of affordable housing, help house those on Afghan resettlement schemes currently in bridging accommodation and ease wider homelessness pressures in the local community. West Northamptonshire Council has been made an indicative LAHF Round 2 allocation of £1,32m and was required to submit an Expression of Interest (EOI) on 5 July 2023. If this EOI is accepted by central government then the Council will be expected to sign a Memorandum of Understanding to be formally awarded the funding.
- 2.4 In addition to the general acquisitions programme and LAHF programmes, the authority would like to bid for DLUHC Single Homelessness Accommodation Programme (SHAP) funding which has deadlines in September and November 2023 for submissions. The aim of SHAP is to provide funding for appropriate accommodation for entrenched rough sleepers likely to have very complex needs. This programme will also require the council to acquire and renovate suitable accommodation for this cohort.
- 2.5 The Council already has a budget for general acquisitions to meet local housing need. For the Council to complete additional acquisitions in the LAHF scheme approval for additional budget and an increase in the Housing Revenue Account capital programme will be required.
- 2.6 These multiple acquisition programmes require an increase in capacity and some additional specialist skills associated with acquisitions/renovations work. To meet funding programme deadlines these programmes must be delivered at pace. Engaging the services of an external property purchasing and renovation company will increase the pace of this activity using a specialist service and make the best use of limited officer capacity during a period of intense acquisitions activity which is unlikely to be repeated.

3. Recommendations

- 3.1 That Cabinet recommend to Full Council an increase in the capital programme of £10.907 million additional funding/borrowing in the Housing Revenue Account to deliver the LAHF R1 and R2 programmes.
- 3.2 That Cabinet delegate authority to the Section 151 Officer in consultation with the Cabinet Member for Finance and Cabinet Member for Housing, Culture & Leisure to approve the procurement of services of a property purchasing and renovation company to accelerate delivery and provide the necessary capacity to deliver the different acquisition programmes by the required deadlines subject to full business case and financial appraisal.
- 3.3 That Cabinet delegate authority to the Section 151 Officer to enter into a Memorandum of Understanding with DLUHC relating to LAHF R2 upon confirmation that the Expression of Interest is accepted.

4. Reason for Recommendations (NOTE: this section is mandatory and must be completed)

- 4.1 An increase to the capital programme is being requested to enable completion of LAHF R1 and LAHF R2 programmes within the required timeframes. When the Council submitted its LAHF R1 EOI to DLUHC Registered Provider partners were very willing to support the Council with delivery of the whole of this programme, however they have found it challenging to secure sales with private developers in our area. To achieve the LAHF programme targets it will be necessary for the Council to undertake some direct purchases from the open market. The funding on offer through the LAHF programmes offers a good level of external funding towards property acquisitions between 40% and 50% of the property cost. The properties acquired will form part of the general needs housing stock in the medium/long term so will help address local housing needs once they have been initially used in the short term as temporary accommodation focused on resettlement pressures. The Finance Team have completed modelling within the HRA and set parameters for ceiling purchase prices within each LAHF programme to ensure that the schemes 'breakeven' or payback within the expected timeframes agreed in the HRA and are therefore capable of paying off borrowing over the 40-year business planning period.
- 4.2 The services of a specialist property purchasing and renovation company are required to accelerate delivery and provide the necessary capacity to deliver the different acquisition programmes within challenging timescales. Across WNC and Northamptonshire Partnership Homes there is limited capacity to successfully deliver the three acquisitions programmes simultaneously. Cabinet is being requested to delegate authority to the S151 Officer (in consultation with the Cabinet Member for Finance and Cabinet Member for Housing, Culture & Leisure) to approve the procurement process and most importantly the costs parameters of this process. However, in total costs for these specialist services across the 3 acquisition programmes are likely to exceed £500k therefore a specific delegation to the S151 officer regarding this process and the financial parameters of it is being requested.
- 4.3 The timescales for West Northamptonshire Council for LAHF R2, are to submit an Expression of Interest (EOI) on 5 July 2023. If this EOI is accepted by central government then the Council

be expected to sign a Memorandum of Understanding swiftly afterwards to be formally awarded the funding. The Cabinet meeting cycle and dates would not allow a Cabinet decision within the required timeframes therefore delegated authority is being requested to the S151 Officer to complete this.

5. Report Background

Increase in HRA Capital Programme

- 5.1 The Local Authority Housing Fund (LAHF) is a capital fund introduced by the Department for Levelling Up, Housing and Communities (DLUHC) supporting authorities in England to provide accommodation to families with housing needs who have arrived in the UK via Ukrainian and Afghan resettlement and relocation schemes.
- 5.2 In January 2023, for LAHF R1 WNC was identified as eligible for capital grant funding (under section 31 of the Local Government Act 2003) totalling £3,73m. The funding was allocated specifically to obtain and refurbish 30 homes during 2023 for those unable to secure their own accommodation who are here under Ukrainian and Afghan resettlement schemes. The details of LAHF R1 were as follows:
- Main element: £2,59m for a minimum of 25 homes.
 - Bridging element: £1,14m in funding for a minimum of 5 larger 4+ bedroom homes to be allocated to households currently residing in bridging accommodation.
 - The funding includes £20k per property for refurbishment and other costs
 - The total grant allocation is £3,73m.
 - timescale for delivery of the programme is by 30 November 2023.
- 5.3 On 8 June 2023, WNC was informed that it had been identified as eligible for capital grant funding (under section 31 of the Local Government Act 2003) for LAHF R2 with an indicative allocation of £1,32m in funding. This second round of LAHF is additional support to councils to assist providing safe and suitable housing to those in the UK under resettlement scheme but also support local authorities to acquire good quality, and better value for money Temporary Accommodation (TA) for families owed a homelessness duty by local authorities. The funding is also intended to enable local authorities to grow their asset base, creating sustainable assets to help manage local housing pressures on an ongoing basis. The details of LAHF2 are as follows:
- Resettlement element: to provide a minimum of 7 homes.
 - The Resettlement element of the scheme is for households who have arrived in the UK on the Afghan Citizen Resettlement Scheme (ACRS) and the Afghan Relocations and Assistance Policy (ARAP) and who are currently in bridging accommodation or who have left bridging hotels and are homeless, at risk of homelessness, or living in unsuitable temporary accommodation.
 - Temporary Accommodation element: to provide a minimum of 3 homes.
 - The Temporary Accommodation element of the scheme is to provide accommodation to those households owed a homeless duty by the local authority (this is likely to be local residents to whom a homeless duty is owed).
 - The grant rate per property is £112k (based on median property prices in our area) plus £20k per property to account for other costs including refurbishment.

5.4 Key features of the schemes are:

- Support areas with housing pressures which have generously welcomed substantial numbers of people under the various resettlement schemes so that these areas are not disadvantaged by increased pressures from these arrivals on the existing housing and homelessness systems.
- The funding mitigates the expected increased pressures on local authority homelessness and social housing resources which arise from resettlement schemes as sponsorship/family placements/bridging accommodation arrangements come to an end by increasing the provision of affordable housing to those in the cohort who are homeless, at risk of homelessness, or in bridging accommodation.
- Reduces costs to local authorities on emergency/temporary accommodation.
- Deliver accommodation that as far as possible will convert into general needs housing to support wider local authority housing and homelessness responsibilities to local residents (UK nationals) e.g. after usage by this cohort ends.
- In the longer term helps to build a sustainable stock of affordable housing to meet local housing need.
- Mitigate the impact of resettlement schemes on the existing housing and homelessness systems and those waiting for social housing.

5.5 Under the schemes between 40% and 50% capital funding is provided towards property purchases. Therefore, either the Council or Registered Provider (RP) partners will need to identify between 50% and 60% match capital funding to support this programme.

5.6 Registered Provider partners were very willing to support the Council with delivery with LAHF R1 and R2 but their ability to do so is dependent on having suitable empty/dilapidated properties in their stock to bring back into use, opportunities to remodel defunct specialist accommodation, ability to 'flip' forthcoming shared ownership units into rented accommodation and agreeing sales with developers in our area who are on-site and building new properties. It is unlikely that RP partners will be able to support the whole 40 unit programme and that they will only be able to deliver apart of the programme with the remainder delivered by the council.

Procurement of a specialist property purchasing and renovation company

5.7 Services offered by specialist property purchasing and renovation companies include:

- Taking instruction from WNC concerning property requirements and searching bespoke the local housing markets for matching properties
- Rapid feedback to WNC on potential properties and ability to monitor progress of each property acquisition throughout the process
- Completion of surveys, including asbestos, fire risk assessment, building/structural, gas and electric services.
- Negotiating offers to acquire the properties
- Obtaining and reviewing due diligence survey and reports
- Production of a summary of any risks and mitigations highlighted by surveys and reports to WNC for consideration
- Preparation of a draft Schedule of Works (SOW), ahead of completion of the purchase of the property and a post-purchase site visit with a WNC representative to approve and

the SOW and the works budget

- Coordinating work associated with exchange and completion of contracts for purchases
- Ensuring all works are delivered to the required standard in accordance with the SOW
- Coordination of site visits to allow WNC personnel to oversee the progress of works at each property
- Provision of a full property handover pack including all certificates and warranty documents
- A 12-month defects warranty on each property

5.8 The services of a specialist property purchase and renovation company would accelerate delivery and provide the necessary capacity to deliver the different acquisition programmes within the challenging timescales that have been set. In particular, such a company could be very suitable for some of the potential projects being considered for the Single Homeless Accommodation Programme which include purchase of an existing building which requires extensive remodelling and/or refurbishment. The scale and complexity of such a project may not be possible within existing WNC staff resources and a property purchasing company could potentially deliver “turnkey” solution including purchasing the site and managing works for handover to the authority on payment of SHAP grant.

6. Issues and Choices

Increase in HRA Capital Programme

6.1 WNC could choose to not draw down the LAHF R1 and R2 monies but this would lead to additional revenue spend and pressure on budgets in relation to procurement of temporary accommodation to house those who have arrived in the area through resettlement programmes and are threatened with or have become homeless. Also, this would mean WNC would be declining funds being made available to help mitigate the impact of resettlement schemes on the existing housing and homelessness systems and those waiting for social housing and for additional affordable homes that in the medium to long term will be available to meet local housing needs.

Procurement of a specialist property purchasing and renovation company

6.2 The council could choose to not contract with a company offering specialist property purchasing services but this could compromise WNC’s ability to draw down funding and comply with funded programme deadlines. Lack of additional capacity and specialist skills that a property purchasing and renovation company brings could mean that the authority has reduced ability to benefit from funding support available for resettled households, not increase stock levels and fail to increase the supply of more cost-effective temporary accommodation provision. Not having a specialist company onboard could mean a bid to Homes England for further external funding through programmes such as Single Homelessness Accommodation Programme would be at risk of failure.

MoU for LAHF R2

6.3 Cabinet could choose to not delegate authority to the S151 officer to sign a Memorandum of Understanding with DLUHC but the Cabinet meeting cycle and dates do not allow a Cabinet

decision within the required timeframes therefore WNC would be unable to draw down the funding allocated to it for LAHF R2.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 There is a requirement to increase the HRA capital programme for 2023-24 to cover the full delivery of the LAHF1 and LAHF 2 schemes. This increase is to be part funded by LAHF grant and further HRA borrowing. To cover the budgeted cost of full delivery it is recommended that the HRA capital programme be increased by up to £10.907m to enable council officers to start immediately to acquire the properties already identified. This is necessary to ensure that we have the best chance of delivering these schemes. The Indicative breakdown of the £10.907m and the financing is summarised in the table below:

Acquisitions	Total
Increase in Budget Needed	£10.907m
Funded by:	
LAHF Grant	£5.051m
HRA Borrowing	£5.856m

7.1.2 The increase in the capital programme would be financed by LAHF grant (scheme 1 and 2) of approximately £5.051m with the balance of £5.856m by HRA borrowing. The individual acquisition purchase ceilings have been calculated using the financial appraisal tool which delivers a breakeven point over the 40-year HRA business planning period. Properties acquired up to these ceilings will generate revenues to payback the borrowing over the life of the business plan. This additional borrowing will cost the HRA revenue account approximately £270k per annum.

7.2 Legal

7.2.1 This report is required to ensure that the Council complies with its governance arrangements for the making of decisions, awarding of contracts and entering into of MoUs.

7.3 Risk

7.3.1 Funding for this programme and progress against budgets will be closely monitored by CAB on a regular basis and Cabinet through budget monitoring reports should the council need to make some acquisitions and therefore use some council resources.

7.4 Consultation and Communications

7.4.1 No formal consultation has been undertaken or is required on this proposal. The Council would be able to communicate that it is increasing its housing stock and reducing pressures relating to homelessness and temporary accommodation costs. Communications activity can support future stages of the procurement process to source a specialist property purchasing and renovation company.

7.5 Consideration by Overview and Scrutiny

7.5.1 None.

7.6 Climate Impact

7.6.1 None.

7.7 Community Impact

7.7.1 The LAHF acquisitions will be in localities where there is a good level of service provision including shops and public transport links and existing community hub activities focused on resettlement.

7.7.2 Temporary accommodation acquisitions will increase the supply of housing available locally and reduce the need to use expensive 'nightly-let' accommodation and bed & breakfast.

7.7.3 Participation in the SHAP programme will deliver accommodation units in a supported setting for entrenched rough sleepers to support this extremely vulnerable cohort on their journey towards independent living.

8. Background Papers

8.1 None



WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11th July 2023

Deputy Leader of the Council and Cabinet Member for Housing, Culture & Leisure: Councillor Adam Brown

Report Title	HMO Member Working Group
Report Author	Chris Stopford, Head of Private Sector Housing, chris.stopford@westnorthants.gov.uk

Contributors/Checkers/Approvers

Monitoring Officer	Catherine Whitehead	21/06/2023
Chief Finance Officer	Martin Henry	14/06/2023
Head of Communications	Becky Hutson	14/06/2023

1. Purpose of Report

- 1.1. On 16th December 2021, West Northamptonshire Council Planning Policy Committee resolved to establish a Member Working Group to:
- 1.1.1. Investigate the current rules concerning HMO.
 - 1.1.2. Consider good practice from other similar authority areas.
 - 1.1.3. Consider expert advice, to evaluation options for a way forward.
 - 1.1.4. Review the current rules, in light of evidence gathered, and suggest any amendments to the Planning Policy Committee for its formal consideration; and
 - 1.1.5. Endorses the relevant portfolio holder, Councillor Adam Brown, as the Chairman of the Member Working Group
- 1.2. The report provides a summary of the work of the Member Working Group to the Planning Policy Committee and makes recommendations for the implementation of an Action Plan for Officers of the Council to progress.

2. Executive Summary

- 2.1. The report provides commentary of the work of the Member Working Group against the resolved decision of the Planning Policy Committee in December 2021, reproduced at 1.1 above; and further puts forward a recommended Action Plan for Officers of the Council to implement and take forward the work of the group.

3. Recommendations

- 3.1 It is recommended that Cabinet:

- a) Approves the Action Plan for implementation by Officers of the Council as identified on the Action Plan, subject to separate business cases as identified in the Action Plan.

4. Reason for Recommendations

The recommendation aligns with the 16th December 2021 recommendation of the Planning Policy Committee, in that the report provides the commentary of the working undertaken by the Member Working Group, and the Action Plan provides a structure against which the work of the Working Group can be progressed, and where possible, implemented in the policy and operational practices of the Council.

5. Report Background

- 5.1 West Northamptonshire Council recognises the importance of community cohesion, and it is the case that one of the highest profile issues, in parts of Northampton, is how HMO are managed. This is a locally sensitive issue, but in fact is not unique to Northampton. Many other similar sized local authorities have similar numbers of HMO, and accordingly have similar community tensions and pressures. There is an opportunity to investigate how those other local authorities approach these issues, and to take evidence from a wide range of people and organisations to gain a comprehensive understanding of the issue and choices available to the Council.
- 5.2 The Planning Policy Committee on 16th December 2021 resolved to carry out an investigation into the rules and best practice relating to HMOs, their impact on the community locally, and to make recommendations for the future operation of the rules concerning HMO.
- 5.3 The Member Working Group, chaired by Cllr Adam Brown, includes Members drawn from cross party membership and includes Cllrs Catherine Russell, Bob Purser, Mark Hughes, Sally Beardsworth, Kilbride, Anthony Bagot-Webb, Sam Rumens and Terry Gifford.
- 5.4 The Working Group was supported throughout by Officers from Democratic Services, Housing, and Planning and utilised the skills, knowledge and experience of these officers in gaining an understanding to the regulatory framework and gathering evidence from other external sources.
- 5.5 The Working Group heard from local residents, representing Northampton HMO Action Group; and Ward Councillors (Cllr Danielle Stone, Cllr Zoe Smith) in seeking to understand the perceived

community impact of HMOs, along with representatives from the Northampton Student Landlord Network.

6. Summary of current HMO position across West Northamptonshire

6.1 The Member Working Group gathered evidence from Officers of the Council, local community groups, and local residents regarding the current position regarding HMOs.

6.2 However, for context for the Planning Policy Committee, and in support of the proposed Action Plan.

6.2.1 Members heard from the Head of Private Sector Housing who advised that there are currently 1164 licensed HMOs in the Northampton locality (previously the Northampton Borough Council area), compared with 36 in the Daventry locality (previously the Daventry District Council area), and 12 in the South Northamptonshire locality (previously the South Northamptonshire Council area). This does not include the c150 applications for licenses (either new or renewal applications) that are being processed by the Private Sector Housing Team.

6.2.2 In response to the increasing number of HMOs in the Northampton area, in 2020 the Council introduced an Additional Licensing scheme across significant areas of Northampton. This introduced a discretionary scheme where the Council could exercise additional controls over properties providing accommodation for three or four people from two or more households, sharing facilities. This discretionary power can be implemented for a maximum period of five years, and the current scheme operates until 31st January 2025.

6.2.3 The Members heard that the Housing Act 2004 only allows for the refusal of a licence where, in the opinion of its Officers, the property is considered to fall short of its mandatory amenities and facilities in terms of room sizes, kitchen and bathroom amenities, and general maintenance; or that the proposed licence holder or property manager is considered not 'fit and proper'.

6.2.4 Alongside its licensing process, Members heard that all licenced HMOs are inspected on an intelligence-led approach on a five year inspection cycle. This can be informed by a range of information held by the Council including reactive complaint data from local residents or occupiers of the properties, knowledge about the previous compliance and management history of the landlord, or area based targeted inspection activities by the Team on specific geographic areas.

6.2.5 In terms of the Private Sector Housing Team enforcement activities, the Members heard that during 2022/23 financial year the Team dealt with:

- 298 complaints regarding HMO property condition, and behaviours of landlords,
- 246 complaints regarding properties considered to be operating as HMOs, resulting in 76 being confirmed as not licensable, 66 being brought into the licensing regime, and the balance being subject to continued investigations
- issues 293 statutory enforcement notices

6.2.6 Members heard from the Planning Policy and Heritage Manager who advised that the Council has made a number of Article 4 Directions under the Town and Country Planning Act 1990.

combination, these Directions remove permitted development rights to convert properties from use as a dwelling houses to use as a small house in multiple occupation (between 3 and 6 unrelated occupiers). All such conversions across the Northampton area are required to apply for planning consent.

- 6.2.7 When drafting the Local Plan Part 2 in 2019, the former Northampton Borough Council had regard to research including work undertaken by Loughborough University. This was used to create the specific policy regarding HMOs, which is contained within the Northampton Houses In Multiple Occupation Supplementary Planning Document (SPD) 2019 which sets a policy position of no more than 10% of the total dwellings in a area of 50 metre radius being HMOs. Members were advised regarding grandfather rights that existed for HMOs operating prior to this policy.
- 6.2.8 Members head from local residents and community groups regarding their consideration of the impact of HMOs on their communities and the issues can be considered to fall within:
- The increasing prevalence of unlicensed HMOs in their communities
 - HMO licensing issues, including the general management of the properties, litter and waste generated by licensed HMOs, and a perception of a low level of enforcement activity by the Council
 - Planning issues, including an increasing prevalence of properties without the necessary planning consent, and a perception of a low level of enforcement activity by the Council
 - A concern that when applying the 10% in 50 metre radius SPD that not all HMOs were being identified, and particularly that suspected HMOs should be included within the assessment
 - General issues regarding parking in those streets that have high densities of HMOs given the number of vehicles associated with the properties
 - General issues of crime and anti-social behaviour associated with HMO style properties
 - A loss of family homes due to the increasing number of properties being bought and then converted to HMO style properties

7. Issues and Choices

- 7.1 West Northamptonshire Council, and indeed the Working Group, recognise the importance of community cohesion, and the impact that HMOs can have on our communities. It also recognises the role that HMOs have as part of the overall housing supply across West Northamptonshire, particularly for people on low incomes, key workers and students. That said, it supports the work done by its Officers in ensuring that HMOs are operated within the appropriate legal frameworks, and that those seeking to exploit their position and operate unregulated properties become the focus of attention of the Council's regulatory and enforcement services.
- 7.2 It remains that some issues are either misunderstood, or are incorrectly conflated in the debate about HMOs, and particularly the unregulated and poorly managed HMOs. The objective review of the Working Group, and its recommendations set out in the Action Plan will seek to provide assurances regarding the current regime, further review regarding additional controls which can be added to the regime, and to ensure that information is available via the Council's website providing details about the enforcement regime, the locations of HMOs, and further options that may be available to local communities.

- 7.3 It is however clear to the Working Group that the effective management of the community impact of HMOs, their regulation, and maintaining their compliance with the regime rests across a number of legislative regimes and requires a multi-agency response spanning across the Council's services and partners. Whilst the lead is being proposed as being within the Council's Planning and Private Sector Housing services, it is clear they will need the support of the Council, its partners, the regulated landlords, and our communities in general to influence significant change.
- 7.4 The recommendation regarding the implementation of an Action Plan as outlined below remains the preferred option, however, other options remain, for example the Council could accept the current position and the constraints of the regulatory regimes. This is not recommended, as it is clear that further investigation and review should be commissioned.

ACTION PLAN

Ref	Issue and Action	Lead Officer / Service	Timescale
1	<u>Litter and Rubbish generated from HMOs</u>		
1a	To ensure the accuracy of the information provided to residents, landlords, and our community generally via the website regarding the appropriate disposal of litter and rubbish	Head of Private Sector Housing	October 2023
1b	To ensure HMO licensing conditions, and the information provided with the HMO licence requires the effective control by property managers and licence holders of litter and rubbish generated from licensed HMOs	Head of Private Sector Housing	October 2023
1c	To increase the level of area-based inspections and 'spot checks' on litter and waste being generated, and not disposed of correctly, from HMO style properties	Head of Private Sector Housing / Head of Environmental Protection	Ongoing
2	<u>General maintenance of HMO properties</u>		
2a	To ensure HMO licensing conditions and guidance mirror the Council's expectations of its licensed landlords	Head of Private Sector Housing	April 2024
3	<u>Storage of waste receptacles</u>		
3a	To ensure the accuracy of the information provided to residents, landlords, and our community generally via the website regarding the appropriate storage of waste receptacles	Head of Private Sector Housing	October 2023
3b	To increase the level of area-based inspections and 'spot checks' targeted on the storage of waste receptacles from HMO style properties	Head of Private Sector Housing / Head of Environmental Protection	Ongoing

4	<u>HMO Room sizes and amenity requirements (licensed HMOs)</u>		
4a	To undertake a review of the existing HMO amenity standards that are published and accompany the HMO licence requirements. To make recommendations for the implementation of any amendments to the amenity standards, having regard to the legal requirements, best practice, and Council aspirations.	Head of Private Sector Housing	April 2024
5	<u>Access to the Register of Licensed HMOs</u>		
5a	To ensure that the access for the general public to the register of licensed HMOs is maintained, to implement any improvements that can be made to improve accessibility. Including consideration of the ability to sort the register by street or postcode.	Head of Private Sector Housing	September 2023
6	<u>Enforcement against unlicensed HMOs</u>		
6a	To continue the Council's intelligence led approach to the identification, regulation and enforcement against unlicensed HMOs seeking to ensure that those who seek to gain advantage by operation of HMOs outside of the regulatory regime face the attention of the Council's enforcement services	Head of Private Sector Housing	Ongoing
6b	To ensure that the Council uses all available powers within the Housing Act 2004, and its associated legislation, to ensure effective regulation of HMOs	Head of Private Sector Housing	Ongoing
6c	To provide information via its website, press releases, and engagement activities to provide assurances that the Council continues to provide effective regulation of HMOs across West Northamptonshire	Head of Private Sector Housing	Ongoing
6d	To increase, with the support of the Member Working Group, the resources within the Private Sector Housing Team by 2 full time officers. These Officers will focus on the determination of unlicensed HMOs, the licensing of HMOs, and the regulation of HMO licence conditions	Head of Private Sector Housing	September 2023, subject to separate business case and recruitment

7	<u>Effectiveness of the Housing regulatory regime</u>		
7a	To ensure that a timely review of the Council’s Additional HMO Licensing regime is undertaken to ensure that any decisions regarding the continuation of the scheme, and geographical extension of the scheme can be made before the expiry of the current scheme in January 2025	Head of Private Sector Housing	January 2025
7b	To collate the evidence regarding the implementation of a selective licensing regime (the licensing of all private rented accommodation). Subject to the availability of supportive evidence, to make recommendations regarding the design and implementation of a selective licensing regime	Head of Private Sector Housing	January 2025
7c	To consider and make comments to the current consultation by the Department for Culture Media and Sport (DCMS) regarding ‘ <i>Consultation on a registration scheme for short-term lets in England</i> ’ https://www.gov.uk/government/consultations/consultation-on-a-registration-scheme-for-short-term-lets-in-england/consultation-on-a-registration-scheme-for-short-term-lets-in-england	Head of Private Sector Housing	June 2023
7d	To review the available evidence and best practice and implement a policy (subject to Cabinet approval) to consider the duration of a licence under the Housing Act 2004. <i>Note: Licences can be issued for a period of up to 5 years, and default to 5 years on issue of a licence. The Council can implement a policy that informs when licensed will be issued for a shorter period of time, for example, were planning consent has not been achieved</i>	Head of Private Sector Housing	December 2023

8	<u>Article 4 Directions & Planning Policy</u>		
8a	To ensure that planning applications submitted as a result of Article 4 Directions continue to be determined in accordance with planning policy.	Assistant Director Planning & Development	Ongoing
8b	To ensure, as far as practicable and within current resources, the accuracy of the information held to determine the density of HMOs. Ensure that all available and appropriate information regarding the existence of HMOs is available to planning officers in making their recommendations <i>Note: The Council to ensure that the information held to assess the 10% within 50 metre radius includes all those properties that hold a HMO licence with the Council, are known to need a licence, have relevant planning consent to operate as a small HMO (C4) or sui generis (large HMO), and that information regarding properties that are exempt from the licensing regime area also identified and included in the assessment.</i>	Assistant Director Planning & Development	October 2023
8c	To ensure that information available to residents, communities, property owners, and developers regarding the existence of the Article 4 Directions is accessible on the Council's website	Assistant Director Planning & Development	April 2024
9	<u>Planning Enforcement in respect of unauthorised HMOs</u>		
9a	To ensure that the Council has regard to its Planning Enforcement Policy	Assistant Director Planning & Development	Ongoing
9b	To provide information via its website, press releases, and engagement activities to provide assurances that the Council continues to provide effective regulation HMOs across West Northamptonshire	Assistant Director Planning & Development	Ongoing

10	<u>Effectiveness of the Planning regulatory regime</u>		
10a	To consider and make comments to the current consultation by the Department for Levelling UP, Housing and Communities (DLUHC) <i>Introduction of a use class for short terms lets and associated permitted development rights</i> https://www.gov.uk/government/consultations/introduction-of-a-use-class-for-short-term-lets-and-associated-permitted-development-rights	Assistant Director Planning & Development	June 2023
11	<u>Parking Issues</u>		
11a	To undertake a further investigation relating to the density of vehicle ownership, including the identification of domestic and commercial ('white van) vehicles, and use across licensed HMO properties and single-family dwellings of comparable size. To consider, as a multi-agency, the impact of vehicle ownership resulting in reported community impact from HMO properties. Make recommendations regarding the provision of information to local communities, or for additional regulatory controls as appropriate.	Highways Team	January 2024, subject to a separate business case
11b	To ensure that information regarding the implementation of residents' controls parking is available on the Council's website, ensuring that local communities and their advocates and Ward Members can make informed decisions regarding the consideration of, and the implementation of such controls	Highways Team	October 2023

8. Implications (including financial implications)

8.1 Resources and Financial

8.1.1 Where the action plan requires the commissioning of further evidence, additional financial resources may be required.

8.1.2 The Action plan identifies the increase in resources for Private Sector Housing by 2 full time equivalent officers. This has a revenue cost to the Council is £100k per annum. The Housing Act 2004 section 63 permits the Council to charge a fee for applications for HMO licences. The fee, mitigated by the Provision of Services Regulations 2009, must be reasonable and proportionate. The Head of Private Sector Housing will produce a separate business case that will consider where elements of this additional cost can be included within the fees and charges for HMO licensing inspections, and enforcement activities.

8.2 Legal

8.2.1 There are no legal implications arising from the proposals to endorse the recommendations of the Working Group and agree an Action Plan approach to the progression of their recommendations.

8.2.2 Legal implications will be considered alongside the implementation of any future matters arising from the Action Plan

8.3 Risk

8.3.1 There are no significant risks arising from the proposed recommendations in this report.

8.4 Consultation

8.4.1 The Working Group have drawn evidence from local communities, Ward Members, members of the Northampton Student Landlord Network, and Officers of the Council.

8.4.2 Where, in the progression of the Action Plan, further consultation is required this consultation will be undertaken

8.5 Consideration by Overview and Scrutiny

8.5.1 Not applicable

8.6 Climate Impact

8.6.1 Not applicable

8.7 **Community Impact**

- 8.7.1 The proposed Action Plan will relate universally across the whole of West Northamptonshire.
- 8.7.2 The work of the Member Working Group was in direct response to issues raised by our Community. The work of the Working Group and the implementation of the further Action Plan is considered to have positive community impact.

8.8 **Communications**

- 8.8.1 A communication plan will be developed for the Cabinet meeting outcomes on the 11th July 2023

9. **Background Papers**

- 9.1 None



WEST NORTHAMPTONSHIRE COUNCIL

CABINET

11th July 2023

Cabinet Member for Finance: Councillor Malcolm Longley

Report Title	Disposal of land by leasehold
Report Author	James Aldridge, Head of Property Strategy & Estates James.Aldridge@westnorthants.gov.uk Dina Quainton, Senior Estates Surveyor Dina.Quainton@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	21/06/2023
Chief Finance Officer (S.151)	Martin Henry	21/06/2023
Other Director	Stuart Timmiss – Executive Director Place, Environment and Economy Simon Bowers – Assistant Director Assets and Environment	16 June 2023
Head of Communications	Becky Hutson	21/06/2023

List of Appendices

- Appendix A – Becket’s Park Pavilion
- Appendix B – 19th Century Stable Yard, Delapre Abbey
- Appendix C – Land off Manor Road, Brackley
- Appendix D – Confidential information

1. Purpose of Report

To seek approval for three disposals of land by leasehold: the former café at Becket's Park, Northampton, the 19th Century Stable Yard at Delapre Abbey, and land off Candleford Close, Brackley for a skate park and youth/community centre.

2. Executive Summary

- 2.1 It is often helpful for the Council to put property which has an important public function or heritage significance in the hands of third parties by leasehold, therefore retaining a degree of security for the public good whilst enabling beneficial use. This report sets out two cases where it is considered this applies: Becket's Park Pavilion, and the 19th Century Stable Yard, Delapre Abbey, both in Northampton.
- 2.2 The report also covers a third proposed leasehold disposal, to Brackley Town Council for land at Candleford Close, Brackley on which it proposes to construct a skate park and youth/community centre. This is intended to allow the Town Council to invest in providing facilities of value to the local community.

3. Recommendations

- 3.1 It is recommended that Cabinet:
- 3.1.1 In relation to Becket's Park Pavilion:
- a) Authorises the Assistant Director Assets & Environment to grant the leases to the proposed tenants for the respective parts of the property broadly on the terms set out in the report.
 - b) Notes and agrees to the proposed use being a part departure from the original proposal to use the whole of the building entirely for community type uses.
- 3.1.2 In relation to the 19th Century Stable Yard at Delapre Abbey authorises the Assistant Director Assets & Environment to grant extensions of the long stop date in the agreement for lease to:
- a) 31st January 2024.
 - b) In consultation with the Portfolio Holder for Finance, such later date is as reasonably necessary to support the restoration of the Stable Yard and it coming into productive use.
- 3.1.3 In relation to the land at Candleford Close, Brackley, authorises the Assistant Director Assets & Environment to grant a lease at less than best consideration to Brackley Town Council (BTC) as if BTC was a VCS group within the meaning of the Policy on the Voluntary, Community, Social Enterprise, and Faith Group use of Property and it had submitted a successful expression of interest under that Policy.

4. Reason for Recommendations

- 4.1 The reasons for each proposed transaction are set out in the relevant Appendices.

5. Report Background

- 5.1 It is often helpful for the Council to put property which has an important public function or heritage significance in the hands of suitable third parties. Depending on the nature of the property this may be a charity, voluntary group, or commercial operator.
- 5.2 It is proposed to make arrangements for two properties (a) the Pavilion in Becket's Park, Northampton, and (b) the 19th Century Stable Yard, Delapre Abbey, Northampton. In both cases the property has heritage value but is also important for public enjoyment of the surrounding parkland.
- 5.3 In the case of Becket's Park, the proposal is to let the building under two leases to a commercial café operator and Buddies of Becket's, a charity concerned with the park. The details are set out in Appendix A, with confidential information in Appendix C.
- 5.4 In the case of the 19th Century Stable Yard, the proposal is to further amend an existing agreement for lease with Delapre Abbey Preservation Trust (DAPT) to extend the longstop date by which the DAPT can call for grant of the lease. This is needed due to the extended programme for securing grants for the scheme.
- 5.5 Additionally, it is proposed to grant a lease to Brackley Town Council in order to enable it to develop a skate park and youth/community centre on land off Candleford Close, near Brackley Leisure Centre. This should deliver useful community benefits whilst not incurring any appreciable cost for the Council.

6. Issues and Choices

- 6.1 The issues and choices in each proposed transaction are set out in the relevant Appendix. In each case it is suggested the optimal choice is to proceed with the proposed disposals, as it will help the Council secure useful outcomes for the community whilst reducing its costs.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The proposed leases would result in a small annual income. They would also remove certain costs which the Council would otherwise need to pay.

7.2 Legal

- 7.2.1 Each of the disposals is proposed to be made under the powers provided by Section 123 of the Local Government Act 1972. Specific details are provided in the relevant appendices.

7.3 Risk

- 7.3.1 Risks relating to each proposed transaction are set out in the relevant Appendices.

7.4 Consultation and Communications

7.4.1 Relevant matters are set out in the relevant Appendices.

7.5 Consideration by Overview and Scrutiny

7.5.1 None.

7.6 Climate Impact

7.6.1 Relevant matters are set out in the relevant Appendices.

7.7 Community Impact

7.7.1 Relevant matters are set out in the relevant Appendices.

8. Background Papers

8.1 None.

Appendix A: Becket's Park Pavilion

A1. Executive Summary

- A1.1 Within Becket's Park, Northampton is a pavilion. This has been without formal occupation for some time, but had been used by BOB for storage. This use is not formally documented, which carries risks. The apparently unoccupied nature of the building has contributed to anti-social behaviour in the area.
- A1.2 Following advertisement, offers from two parties to lease the building were received. BOB offered to take all or part of the building, using part of storage and part (if included) for a volunteer-run café. BOB did not offer any rent and its offer for the whole building would have required investment from the Council. The other offer was from a professional café operator, to take part of the building for use as a café. The operator was willing to invest in the building and after a rent-free period to pay a modest rent. If the commercial operator's offer was accepted it was happy for BOB to have occupation of the remainder of the building.
- A1.3 A Cabinet decision of July 2021 had intended the building be used solely by a Voluntary and Community Sector (VCS) operator, but the offers received suggest the best outcome for both the community and for the Council's finances would be to accept the commercial offer and alongside that offer BOB a lease of the remainder of the building for its storage purposes. This is therefore recommended.

A2. Reason for Recommendations (NOTE: this section is mandatory and must be completed)

- A2.1 To secure use of part of the property as a café, which is likely to improve the enjoyment of the park by the public.
- A2.2 By granting the commercial lease achieving an internal refurbishment of the property which will enhance the value of the Council's asset and achieve a modest rental income (after the initial rent-free period has expired).
- A2.3 Insofar as the commercial lease is concerned, complying with the Council's duty to secure the best consideration reasonably obtainable from property disposals.
- A2.4 Granting the proposed lease to BOB will give the group some security for the future.
- A2.5 Ensuring that there are proper legal agreements in place for the management of the property.
- A2.6 To secure positive uses for the property, helping to avoid deterioration of asset.

A3. Background

- A3.1 The former café at Becket's Park comprises a single storey 19th Century style pavilion with verandas to two aspects. The building is owned freehold by the Council. It is of timber construction and probably dates from circa 1920. The building was previously used for a period

of time as a café/kiosk and the previous tenant assisted the Council with tennis court usage and hired out boats to use on the adjacent river and canal.

- A3.2 Unfortunately, the previous tenant died some years ago. The building was not formally re-let and at the present time is informally occupied by BOB. BOB is a charity which assists the Council in the management of the park and organises some of the smaller events that take place throughout the year, such as Easter egg hunts. BOB does not have any form of legal agreement to use the building and does not contribute to the building's costs in any way, including electricity usage. It is important this position is regularised.
- A3.3 A condition survey of the building was recently carried out and it was confirmed that the building is in fair condition but does require some work to improve its weather resistance. This includes replacement felt to the roof and repair of the rainwater goods together with redecoration throughout. The former requirements are in the process of being completed. Its condition would benefit from usage; this is also likely to deter vandalism and anti-social behaviour especially in the veranda areas.
- A3.4 In July 2021 Cabinet approved letting the building. At the time this was to be on the basis of a solely VCS use. The process to be followed was essentially the same as that later set out in the Council's Policy Voluntary, Community, Social Enterprise, and Faith Group use of Property. Due to staff handovers this element was missed when the property was advertised. Whilst this is regrettable the effect may, as described below, have been positive.
- A3.5 BOB had approached the Council seeking to formalise its occupancy of the property. BOB wished to enter into discussions about the future use of the building as they were of the view that it was the Council's intention to consider the demolition of the building, which despite its age, is not listed. This was incorrect but it is understandable the concern existed.
- A3.6 The Council already had a list of other parties who were interested in leasing the property, and in accordance with Section 123 of the Local Government Act 1972, was required to advertise the proposed disposal (lease) for two consecutive weeks in a local newspaper. This was done by placing a notice in the Northampton Chronicle and Echo giving the required notice and seeking expressions of interest in respect of the building.
- A3.7 Following the advertising of the Property, viewings were arranged, and bids were received from both the commercial and voluntary sector. These are described in section A4.

A4. Issues and Choices

- A4.1 To help ensure bids were credible, it was made clear that no bid would be considered unless the property had been viewed. Following the period of advertising, this generated interest from five separate parties but only two submitted bids for the property. The groups that did not submit a bid, included a railway group who required a hall like facility, another catering facility who did not want to carry out such extensive refurbishment works, and a theatre group due to the layout of the property being too small for their required use.

- A4.2 BOB put forward two offers, one for the continued use of half the building for their storage and the second for the whole of the property which would include the storage use together with the remaining half to be used as a café to be run on a voluntary basis. BOB would not be offering any rent and they would require the Council to undertake works, including reconnection of the gas and water, at the Council's cost. The group has no financial standing and would require on-going assistance from the Council with repairs and improvements, although it would carry out some refurbishment work to the kitchen area and redecoration of the property.
- A4.3 The other bid was from Mr Iain Hill who runs professional catering establishments. He would require a 10 year lease (subject to a five year rent review and a two year tenant only break clause) with modest real rent (see Appendix C). A one year rent free period would be required and he would carry out external redecoration, together with internal decoration of the café area, refurbishment of the kitchen area, reconnection of the services, the provision of a toilet for customers' use, and CCTV. Mr Hill has produced evidence of his financial standing. His lease would only be of approximately half the building including the veranda areas. He has confirmed that he would have no objection if his bid were acceptable by the Council, to allow BOB to continue to occupy the storage area of the building.
- A4.4 All the bids would mean that the Council would be responsible for the structure of the building. Under the terms of the commercial lease, the Council would continue to insure the whole of the building but recharge a proportion for the commercial tenant. The commercial tenant would be liable for business rates if applicable. However, it is possible that it would be below the threshold for 100% small occupier relief and consequently, business rates may not apply. The Council would reserve the right under the lease to continue to have access to the electric supply connection which is located within the property to provide a supply for major events which are organised in the park and the Council would pay for all electricity during that period (this supply is within the café's area).
- A4.5 The commercial tenant would have a licence for the use of a small grass area around the property allowing for tables and chairs to be provided, but these would be cleared away when the café is not open.
- A4.6 The bid from the proposed commercial tenant would result in a small annual rent payable to the Council after the initial year. It would also result in the refurbishment of the property and no or little cost to the Council and a reduced liability in the future in terms of internal repairs, interior and exterior decoration. The occupation of the building is also likely to reduce vandalism and antisocial behaviour and the tenant's proposed installation of CCTV would also assist with security.
- A4.7 The bid from BOB for the whole building would be likely to result in increased future costs to the Council and an initial contribution to the refurbishment would also be required. It is unlikely that there will be much future investment in the property. Although this is acceptable in terms of the storage area where the only works are likely to be internal decorations (which could be undertaken by the group), the café area requires a great deal of expenditure to refurbish it to a safe and hygienic standard.

- A4.8 The division of the building between the two users appears to offer the best outcomes both commercially and for the public. A professionally run café is likely to be able to respond to market demands and provide a range of services desired by park users. BOB would retain a storage facility to support its operations in the park.
- A4.9 It is therefore proposed to accept the commercial offer and to grant BOB a lease of the remaining part of the building in line with the terms of the Council's policy on the VCS use of property.

A5. Implications (including financial implications)

A5.1 Resources and Financial

- A5.1.1 The proposed leases would result in a small annual income which would help support the parks service. They would also remove certain costs which the Council would otherwise need to pay.

A5.2 Legal

- A5.2.1 The property would be leased to the commercial tenant for a period of 10 years, with the lease providing for the rent to be reviewed on the fifth anniversary of the term. The lease would also provide the tenant with a rent-free period of one year and a break option after two years. They would have a protected business tenancy (under the terms of the Landlord and Tenant Act 1954). This allows for a lease to be renewed following expiry at market rent unless certain conditions are met (for example, for breach or if the landlord wishes to use the building itself). The proposed commercial tenant requires the ability to renew the lease on expiry because of the expenditure he will incur at the start of the lease.
- A5.2.2 In line with the Council's Policy on Voluntary, Community, Social Enterprise, and Faith Group use of Property, BOB would be provided with a seven year lease, with a 'peppercorn' rent (no real rent). This would not be a protected business tenancy. BOB would be required to pay towards the utilities (the precise mechanism for calculating these payments has yet to be agreed).
- A5.2.3 The Council would still need to meet costs of structural maintenance of both parts of the property, and external decoration of the part occupied by BOB.
- A5.2.4 As this building is within an area of public open space, it is a requirement under Section 123(2A) of the Local Government Act 1972 that any disposal (including leasehold disposal) be advertised for two consecutive weeks in the local newspaper and any objections considered. The notice has been published as required and no objections were received.
- A5.2.5 Section 123 also requires that disposals longer than seven years in duration are (except with the Secretary of State's consent) at the best consideration reasonably obtainable. Since the property has been marketed and the financially best offer is proposed to be accepted, this test is met.

A5.3 Risk

A5.3.1 Although used for storage by BOB, the property appears vacant. This has attracted unwanted attention from vandals and those attempting to break in. A visual occupancy of the building with security would be likely deter anti-social activities and therefore lower the risk to the building.

A5.3.2 Taking no action is likely to generate poor publicity for the Council.

A5.3.3 At present BOB occupies the property without any legal agreement. This is poor practice and could expose the Council to legal risks and challenges. Putting in place a proper lease should remove these risks.

A5.4 Consultation and Communications

A5.4.1 All groups that had approached the Council about the building were contacted during the advertising process. The advert inviting expressions of interest encouraged interest from all sectors.

A5.5 Consideration by Overview and Scrutiny

A5.5.1 None.

A5.6 Climate Impact

A5.6.1 Bringing the building back into use as proposed is unlikely to have any material impact on the climate. The works to do so would produce some minor emissions, but by encouraging use of the park as a local facility it may reduce transport emissions.

A5.7 Community Impact

A5.7.1 Bringing the building into use is likely to be a benefit to the public as it would increase the leisure offer of Becketts Park. Having the building in visible occupation should also reduce anti-social behaviour in the area. Formalising an occupational agreement with BOB which is also likely to make them feel valued and secure.

Appendix B: 19th Century Stable Yard, Delapre Abbey

B1. Executive Summary

- B1.1 Delapre Abbey is an important historic asset in southern Northampton. Along with the parkland, it is owned by the Council. The Abbey itself is let on a long lease to the Delapre Abbey Preservation Trust (DAPT). Part of the Abbey complex, but not covered by the current lease, is the 19th Century Stable Yard.
- B1.2 The former Northampton Borough Council (NBC) entered into an agreement for lease (AfL) with the DAPT to allow the Trust to restore and manage the Stable Yard. Due to Covid-19 DAPT was unable to meet the longstop date in the AfL.
- B1.3 In September 2021 Cabinet approved the extension of the Long Stop Date in the AfL to 7th August 2022 and agreed to vary the AfL so that the lease term would be coterminous with the lease that DAPT holds on Delapre Abbey as well as other minor adjustments. For various reasons, DAPT has been unable to meet the revised long stop date of 7th August 2022.
- B1.4 This report therefore seeks authority to vary the AfL by moving the longstop date from the 7th August 2022 to 31st January 2024 but also seek delegated authority for the Assistant Director Assets and Environment to make reasonable extensions to this long-stop date should it be considered necessary and in line with project timescales for the restoration of the Stable Yard.
- B1.5 It is considered DAPT is best placed to take forward the restoration of the Stable Yard and put it to worthwhile uses. Doing so should also help DAPT remain viable and thus continue to secure the future of the Abbey. The risks to the Council of agreeing to the extension should be low.

B2. Reason for Recommendations

- B2.1 To maximise the opportunity to see the plan for the Delapre Abbey site implemented, and help sustain the Delapre Abbey Preservation Trust, thus securing important public benefits and community resources.
- B2.2 To make it more likely that public expectations will be fulfilled.
- B2.3 To minimise the risk of costs falling on the Council to restore and manage the 19th Century Stable Yard.

B3. Background

- B3.1 Delapre Abbey and park were acquired by the former Borough of Northampton in the 1940s. The Abbey building itself was let to Northamptonshire County Council for use as its archives centre until the 1990s (when that function was relocated to the current archive office at Wootton Hall Park). Since then, there has been a lengthy period of review and consideration of the future of the important listed Abbey buildings.

- B3.2 The main Abbey buildings were substantially repaired and renovated in the later part of the previous decade, the work being funded in part by NBC, in part by English Heritage and in part by fundraising by the Delapre Abbey Preservation Trust (DAPT). They are now let to DAPT on a 125-year lease from 30th April 2019. The lease is at a peppercorn and subject to a landlord rolling break on 12 months' notice with the lease being outside the security of tenure provisions of the Landlord and Tenant Act 1954. WNC remains responsible for the structure of the property and 50% of the cost of the repair of the windows with the other repairing liabilities being the responsibility of the Trust. There are also licence agreements in place to DAPT in respect of the car park, Walled Garden, Eastern Garden and South Lawn.
- B3.3 Within the grounds, but outside the areas currently let to DAPT, is a 19th Century Stable Yard. This is not listed but is within the conservation area and adds to the setting of the Abbey. DAPT has previously approached WNC with a proposal to convert the property, the detail of which was included within the September 2021 Cabinet Report but broadly included:
- Small creative business studios/workspaces. The units would be developed commercially to provide a small business complex generating income for the Abbey through rents, with a focus on creative workplace, with shared exhibition or retailing areas which are accessible to the public.
 - Niche retailing with a marketplace, a microbrewery, and a café.
- B3.4 DAPT previously applied for planning permission (N/2013/0612) for various projects including the 19th Century Stable Yard. Planning permission was given on 30th October 2013. This allowed for various works and "change of use of building to business studio/workshops (Class B1)."
- B3.5 While the other projects were completed, work was not commenced on the 19th Century Stable Yard until further investigations were undertaken and a business plan developed. A planning consultant is currently working with DAPT to develop a proposal for the site and considering whether a fresh planning application is needed. If a further planning application is required, this would be submitted by DAPT at its own cost.
- B3.6 Agreement was reached with NBC to enter into an AfL on 7th February 2020. Under this agreement, NBC would have been required to let the property to DAPT if certain conditions were met by the longstop date of 7th August 2021. This included the Landlord having approved DAPT's works plans and having secured vacant possession of the property.
- B3.7 As these conditions had not been met by the long stop date of 7th August 2021, Cabinet approved, at the September 2021 meeting, an extension of the long stop date to 7th August 2022. While DAPT has continued to develop the plans for the site, the conditions remain unsatisfied, and the revised long stop date has passed.
- B3.8 It is therefore proposed to agree an extension of the longstop date in the AfL until 31st January 2024. This should be sufficient time for DAPT to complete its wider investigations and agree proposals for the site with the Council. However, given the complexities, it is also proposed that delegated authority is given, in consultation with the relevant Cabinet Members, to make agree further extensions to the long stop date in the AfL if deemed appropriate.

B4. Issues and Choices

- B4.1 The Stable Yard is no longer needed as stables and is currently unused except for storage. DAPT has identified how it can be brought back into beneficial use and enhance the visitor experience at Delapre Abbey. Unless the property is occupied or suitably managed, it is likely that the condition of the property would deteriorate and result in increased management cost for WNC.
- B4.2 WNC could refuse consent to the extension of the longstop date in the agreement to lease. This is not recommended as it would cause uncertainty and discourage DAPT from proceeding with their plans to bring the premises back into use. The vision for the 19th Century Stable Yard is part of DAPT wider vision for Delapre Abbey which would be adversely impacted if the stables were not developed.
- B4.3 WNC could also consider whether to develop the site itself. However, no viable alternative uses other than those proposed by DAPT have been identified. The buildings are in a poor state of repair and would require substantial capital investment which has not currently been provided for. In addition to this, any future use of the site would need to be sympathetic to the wider services offered at Delapre Abbey so as not to have a detrimental impact on overall viability.
- B4.4 WNC could let the stables as storage, but it is likely the income set against the cost of maintenance would not make this a financially viable option.

B5. Implications (including financial implications)

B5.1 Resources and Financial

- B5.1.1 No income is currently being generated by the Stable Yard but the liability for repair remains with WNC. Completion of the project would mean that DAPT would take on the management of the property and the responsibility for ongoing repair and maintenance. In addition, DAPT would look to undertake significant refurbishment works which will not only enhance the value of the asset but would also enhance the overall visitor experience of Delapre Abbey.
- B5.1.2 If the stables continue to be used for storage it is unlikely the income would meet the repairing liabilities. It is therefore likely that the disposal would be at best price (see below).
- B5.1.3 All the documentation has been drafted and the proposal to alter the terms via a deed of variation should not result in material legal costs.
- B5.1.4 The property is currently largely vacant and generates no income. It is estimated that the market rent for the property would be negligible and significant capital investment would be required to achieve this.

B5.2 Legal

B5.2.1 The disposal would be authorised under Section 123 of the Local Government Act 1972. This requires that freehold disposals and all leasehold disposals of seven or more years in length must be on the best consideration reasonably obtainable. However, there is an exemption where the Secretary of State otherwise approves. Sometimes specific consent is required, but often the necessary consent is given by the General Disposal Consent (England) 2003. This gives consent for disposals at up to £2 million less than the best consideration where the Council considers that the purpose for which the land is disposed will advance the economic, social, or environmental well-being of the area or people in it. In this case, for the reasons given above, the disposal is probably best consideration or if not, is close to it. If there is a need to rely on the General Consent is reasonable for the Council to consider that the proposed use of the property would contribute to the social and economic wellbeing of both the immediate environs of the Abbey and also the wider area.

B5.2.2 The Council must also comply with the subsidy control law. However, it is considered that this case is a disposal would not result in a subsidy of the kind or scale, if it is a subsidy at all, which is prohibited.

B5.3 Risk

B5.4 Agreeing an extension would carry very little risk to the Council because the Council's obligations are, generally, limited to making the property available to DAPT and, as with the main Abbey lease, possession can be recovered should problems arise in future with the overall project.

B5.5 Not agreeing an extension to the longstop date would create uncertainty and potentially increase costs for both parties. WNC would be required to continue to manage and maintain the property with little prospect of income to mitigate the costs. The prospective community benefit would be lost and DAPT would be unable to fulfil its wider vision for the Abbey.

B5.6 Consultation and Communications

B5.6.1 There has been no specific consultation undertaken in relation to this proposal. However, the restoration and development of the Delapre Abbey site has been the subject to extensive planning, involving public consultation and engagement.

B5.7 Consideration by Overview and Scrutiny

B5.7.1 None.

B5.8 Climate Impact

B5.8.1 Bringing the building back into use as proposed is unlikely to have any material impact on the climate. The works to do so would produce some minor emissions, but by encouraging use of the Abbey as a local facility it may reduce transport emissions.

B5.9 **Community Impact**

B5.9.1 The uses proposed would provide space for small business, create jobs, and enhance the visitor experience at Delapre Abbey. It should therefore have a positive impact on the community.

Appendix C: Land off Candleford Close, Brackley

C1. Executive Summary

- C1.1 Brackley Town Council (BTC) is seeking to locate a skate park and youth/community building on land owned by WNC off Candleford Close, Brackley, near Brackley Leisure Centre.
- C1.2 Given the likely community benefits, it is proposed to offer BTC a lease on a no cost basis on terms which align with those set out in the Policy on the Voluntary, Community, Social Enterprise, and Faith Group use of Property.

C2. Reason for Recommendations

- C2.1 To enable Brackley Town Council to deliver community facilities of benefit to the people of Brackley.
- C2.2 To maximise the likelihood of sustainable delivery of the facilities and the services which would be provided in them.

C3. Background

- C3.1 BTC has a longstanding aspiration to deliver a skate park and youth/community building for the people of Brackley. As the town expands, the need for such facilities increases.
- C3.2 At BTC's request, confirmation was given by letter that a lease would be granted for a skate park on land off Candleford Close near Brackley Leisure Centre if BTC fulfilled certain conditions, notably obtaining planning permission and showing it could fund the development. That confirmation was based on delegated authority and as such was limited in the secure term which could be offered.
- C3.3 BTC recently obtained planning permission (WNS/2022/2029) and would like to proceed with the skate park.
- C3.4 Additionally, BTC sought a site for providing the youth/community centre. Originally BTC wanted to use land owned by WNC off Manor Road, Brackley (the former outdoor pool site). BTC offered to pay the value of the site, but it became clear that it would be difficult for it to do so, and additionally some of planning obligation funds it proposed to use were not suitable for that purpose. BTC also became concerned that it would be difficult to manage facilities in two different places.
- C3.5 Therefore, BTC concluded it would prefer to locate the youth/community centre alongside the proposed skate park. This is a logical outcome and should allow efficient use of land. However, it is likely that BTC will want a longer lease than can be granted under delegated authority. It is therefore proposed Cabinet grants authority to grant a lease as could be done under the terms of the Policy on the Voluntary, Community, Social Enterprise, and Faith Group use of Property. The Policy sets a default limit of seven years but allows it to be extended where justified.

C4. Issues and Choices

- C4.1 The Council could choose to grant BTC no lease, a lease of a short duration, or a lease of longer duration.
- C4.2 Granting no lease to BTC would be likely to prevent the delivery of valuable local facilities. Given BTC would be taking the lead on delivering these, at no cost to WNC except potentially use of some S106 sums which could be used for other purposes, this option is not recommended.
- C4.3 Granting only a short term lease to BTC is likely to also impair BTC's willingness to invest significantly, to a degree it would probably not provide the youth/community centre. Therefore, this option is also not recommended.
- C4.4 Having the ability to grant a longer lease to BTC (the length being determined in consultation with BTC) should enable the full project to be delivered. This should maximise the community benefits.
- C4.5 The Council could also offer the lease at no cost, at a market rent, or at a rent somewhere between those levels. Given the nature of the intended use, and the benefits to the community flowing from it, it is suggested no cost would be appropriate.
- C4.6 Therefore, the recommendation is that the lease be granted to BTC at no cost (except if applicable elements such as insurance rent) and for a lease period to be agreed on terms equivalent to those in the Policy on the Voluntary, Community, Social Enterprise, and Faith Group use of Property, that is, a period reasonably necessary to deliver a sustainable business plan. Given the scale of investment proposed this may be for a period of some decades.

C5. Implications (including financial implications)

C5.1 Resources and Financial

- C5.1.1 No income is currently being generated by the land in question. Its disposal would remove a very small grounds maintenance cost and involve a minor degree of management cost.
- C5.1.2 The land has limited value in its current condition. In theory the Council could pursue development, for example housing, but this is likely to be challenging. Therefore, whilst the disposal would be at less than best consideration, the financial loss would be small or theoretical.
- C5.1.3 Conversely, whilst very hard to measure, it is likely that the provision of facilities to positively engage young people would have financial benefits to WNC.

C5.2 Legal

- C5.2.1 The disposal would be authorised under Section 123 of the Local Government Act 1972. This requires that freehold disposals and all leasehold disposals of seven or more years in length must

be on the best consideration reasonably obtainable. However, there is an exemption where the Secretary of State otherwise approves. Sometimes specific consent is required, but often the necessary consent is given by the General Disposal Consent (England) 2003. This gives consent for disposals at up to £2 million less than the best price where the Council considers that the purpose for which the land is disposed will advance the economic, social, or environmental well-being of the area or people in it. In this case there is potentially a modest degree of under-value and therefore the Council can rely on the General Consent. It is reasonable for the Council to consider that the proposed use of the property would contribute to the social wellbeing of Brackley.

C5.2.2 The Council must also comply with the subsidy control law. However, it is considered that this case is a disposal would not result in a subsidy of the kind or scale which is prohibited. Moreover, Brackley Town Council is a public body.

C5.3 **Risk**

C5.3.1 If the Council proceeds as proposed, there would be a risk that BTC did not implement, in whole or part, the proposals outlined. However, this would not be a worse situation than if no lease was granted, and in due course the lease would come to an end or potentially could be terminated. In any event, the risk appears low since BTC is clearly motivated to proceed.

C5.3.2 If the Council declined to grant the lease on suitable terms, it is likely the community facilities would not be provided. The Council would also be likely to be subject to criticism for not enabling developments which BTC is seeking to provide for the benefit of the residents of the town, when it could do so at no cost to it.

C5.4 **Consultation and Communications**

C5.4.1 There has been no specific consultation undertaken in relation to this proposal by the Council. However, it does reflect aspirations for the town set out in the Brackley Masterplan. This was adopted in 2011 by the (then) South Northamptonshire Council. The following items are specifically relevant: H6 (social infrastructure), L5 (facilities and activities for 11-18 year olds), L8 (play spaces and equipment), L9 (indoor and outdoor leisure facilities), L10 (sports, leisure, and recreational facilities). It should be recognised that the Masterplan called for a skate park in the south of the town, in St James Park (L7), but naturally specific details such as this change over time.

C5.5 **Consideration by Overview and Scrutiny**

C5.5.1 None.

C5.6 **Climate Impact**

C5.6.1 Construction of the skate park and youth/community centre would inevitably involve some carbon emissions. However, it is considered these are justified in the context of providing community facilities for the expanding town of Brackley.

C5.7 **Community Impact**

C5.7.1 Enabling the development by BTC should result in the creation of facilities valuable to the community of Brackley, especially young people.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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