



Cabinet

A meeting of the Cabinet will be held at the Council Chamber, The Forum, Moat Lane, Towcester, NN12 6AD on Tuesday 14 November 2023 at 6.00 pm

Agenda

Public Session	
1.	Apologies for Absence
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 10 October 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.	Report of the Adult Social Care and Health Overview and Scrutiny Committee - Integrated Care across Northamptonshire (iCAN) Scrutiny Review (Pages 13 - 62)
7.	Commissioning of the National NHS Health Check Programme for West Northamptonshire. (Pages 63 - 70)

8.	West Northamptonshire Housing Allocation Scheme (Pages 71 - 218)
9.	Northamptonshire Corporate Parenting Board Annual Report 2022-23 (Pages 219 - 254)
10.	Resources and Waste Strategy for West Northamptonshire (Pages 255 - 318)
11.	Estate and Construction & Maintenance Climate Strategies (Pages 319 - 372)
12.	Council Tax Care Leavers Discount (Pages 373 - 388)
13.	Local Council Tax Reduction Scheme 2024-2025 (Pages 389 - 392)
14.	Public Spaces Protection Order - Emporium Way (Pages 393 - 404)
15.	Active Travel Fund 4 - Connecting the Active Quarter - Access for All, Northampton (Pages 405 - 412)
16.	Decision Taken Under Special Urgency Powers: Acquisition of Former Bus Depot, St James, Northampton (Pages 413 - 430)
Exclusion of the Press and Public	
17.	<p>Exclusion of the Press and Public</p> <p>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 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"</p>
Private Session	

Catherine Whitehead
Proper Officer
6 November 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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The Guildhall
St Giles Street
Northampton
NN1 1DE



Cabinet

Minutes of a meeting of the Cabinet held at Council Chamber, The Forum, Moat Lane, Towcester, NN12 6AD on Tuesday 10 October 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 Jonathan Harris
 Councillor Keith Holland-Delamere
 Councillor Koulla Jolley
 Councillor Paul Joyce
 Councillor Bob Purser
 Councillor Wendy Randall

Officers:

Anna Earnshaw, Chief Executive
 Rebecca Purnell, Assistant Chief Executive
 Martin Henry, Executive Director - Finance (Section 151 Officer)
 Sarah Hall, Deputy Director - Law & Governance (Deputy 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
 Sally Burns, Director of Public Health
 Lisa Hyde, Acting Director of Communities and Opportunities
 Jo Barrett, Assistant Director - Housing and Communities
 Paul Hanson, Head of Democratic & Elections
 Kathryn Holton, Committee Officer
 Gillian Baldock, Political Assistant to the Conservative Group

52. Apologies

There were none.

53. Declarations of Interest

There were none.

54. **Minutes**

The minutes of the meeting on 19 September were agreed as an accurate record.

55. **Chair's Announcements**

There were none.

56. **Northamptonshire Youth Justice Plan**

At the Chair's invitation Councillor Baker presented the report and outlined the salient points.

Councillors made the following comments:

- The report and strategy were welcomed. However the increase in violence and use of weapons, especially by boys and young men was concerning.
- Would the data be split between North Northants and West Northants in future? Provision of detail by LAP area would also be helpful.
- Most of the funding had been used for salaries – more needed to be spent on prevention and early intervention.

Councillor Baker responded as follows:

- Salary costs were primarily related to provision of the dedicated and experienced youth/social workers rather than overhead costs.
- Data could be obtained from the new police data system – potentially segregated by LAP.
- Splitting between North Northants and West Northants was in the hands of Ofsted and would be likely to happen at some point.

The Executive Director People advised that prevention of youth offending was a priority and ways of improving early help were being looked at.

Councillor Golby offered his support to the report. Money had been given by Public Health to tackle issues such as substance abuse.

The Chief Executive stated that there were a high number of children in care in the figures. Detailed case studies had identified that very early diagnosis and intervention were key in preventing youth offending.

RESOLVED: Cabinet agreed the content of the Youth Justice Plan for 2023/24 and recommend the Plan to Council for approval.

57. **The Establishment of a West Northamptonshire Standing Advisory Council for Religious Education (SACRE)**

At the Chair's invitation Councillor Baker presented the report proposing the SACRE for West Northants.

A Councillor welcomed the report and pointed out that a SACRE adviser had now been employed to work one day per week in West Northants and one day per week in North Northants.

RESOLVED: That Cabinet;

- a) Approved the establishment of a West Northamptonshire SACRE.
- b) Approved the SACRE Constitution as detailed in Appendix A

58. **West Northants Council nightly purchased temporary accommodation procurement via Dynamic Purchasing System**

At the Chair's invitation Councillor Brown presented the report. The proposed Dynamic Purchasing System would provide enhanced competition between providers and enable WNC's duty under the Housing Act to be met. The cost over a 5 year period would be up to £30m (accommodation, not system costs) but would be offset by £20m benefits.

Councillors made the following comments:

- The report was necessary and welcomed.
- Would the system help to control costs and monitor quality of temporary accommodation?
- Would the provision be available in all areas? Many people requiring temporary accommodation had no money or transport.
- It would be good if temporary accommodation could be provided in-house in order to control the costs.

Councillor Brown responded as follows:

- The new system would help to monitor costs.
- Increased quality was an objective of the system.
- The spread of accommodation depended on what provision was available. Placing people locally was always the aim, but the needs were massively tilted towards Northampton.
- The council sought to maintain a healthy stock of temporary accommodation but needed private sector assistance at times of high demand.

RESOLVED: Cabinet approved;

- a) The commencement of the procurement process and delegated authority to the Head of Private Sector Housing, in consultation with the Cabinet Member for Housing, Culture & Leisure; Procurement Governance Group and Chief Financial Officer (s151) to manage the process throughout its lifespan, including procuring, awarding, maintaining and cooling off (if needed) the DPS.
- b) The introduction of a new Dynamic Purchasing System (DPS) for the booking of nightly purchased temporary accommodation for homeless households from the 1st June 2024
- c) That the duration of the DPS be for an initial 5-year period beginning from the notified contract award commencement date and with the option to extend on an annual basis whilst the DPS remains fit for purpose and depending upon the Council's ongoing need for this type of temporary accommodation.

59. Procurement of Key Waste Contracts

At the Chair's invitation Councillor Larratt presented the report proposing to commence procurement of key contracts.

Councillors made the following comments:

- A councillor who had been a member of the working group considered that the process had been good. Contracts were vital in continuing to provide a good service.
- Public education and engagement was important, together with encouragement to mend and reuse rather than discard items.
- Use of recycling boxes in terraced streets needed to be addressed.
- Reduced opening hours of recycling centres potentially resulted in issues, including queuing on local roads.
- Community schemes (such as collection of blister packs) needed to be supported and linked to the work done by the council.
- Due diligence and transparency regarding the end destination of recycled items was needed to reassure residents.
- Opportunities should be taken to focus on sustainability, for example in the vehicles used.

Councillor Larratt thanked all those who had spoken for their support and comments and made the following points:

- Residents were key and engagement with them was important.
- Discussions were ongoing regarding opening hours of recycling centres.
- An appointment system could address the issues of queuing at recycling centres, although residents were not in favour of this.
- 85% of residual waste was currently being recycled.
- Harmonisation of waste contracts was the ultimate aim, although some current contracts extended until 2028.

RESOLVED: That Cabinet;

- a) Approved the commencement of procurement for a new contract(s) for the treatment of residual waste.
- b) Approved the commencement of procurement for new contracts for the provision of Household Waste Recycling Centre services.
- c) Approved the commencement of procurement of a contract for a waste transfer facility to enable bulking of dry mixed recyclables collected from the South area.
- d) Delegated authority to the Executive Director for Place, Economy and Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste Services, and the Executive Director for Finance to:
 - i) Finalise the specification for the contracts;
 - ii) Take decisions relating to the procurement processes, to enable them to progress as planned; and
 - iii) Award the contracts, providing the procurement exercises reach a satisfactory conclusion.

60. **Transfer of Dedicated School Grant Funding for Forensic Services from the Education and Skills Funding Agency (ESFA) to West Northants Council**

At the Chair's invitation Councillor Baker presented the report and advised that all other similar units were now being run by local authorities as they were best placed to undertake this.

Councillors made the following comments:

- The report and extra funding was welcomed.
- The beneficial community impact of discussions with St Andrews to train other schools should be noted.

Councillor Baker acknowledged the potential benefit of the closer working relationships.

RESOLVED: That Cabinet;

- a) Accepted the additional funding and commissioning responsibilities for St Andrew's Healthcare forensic services.
- b) Approved the award of a contract to St Andrews Healthcare for the provision of education and training for young people up the age of 18 detained in the unit.

61. **Purchase of a dwelling in Northampton for NCT (General Exception Rule has been applied)**

At the Chair's invitation Councillor Longley presented the report. The largest overspend of NCT was in placements and this was an opportunity to save money and provide a good home for 4 children.

Councillor Baker advised that the property was a bungalow with plenty of parking which would be occupied by 4 children with complex medical needs who required a stable home.

Councillors made the following comments:

- This was a good news story. It was important that planning and consultation with neighbours was undertaken well.
- Bringing care back in-house was welcomed.
- There was an old care home in Daventry which could potentially be redeveloped to provide more accommodation.

RESOLVED: That Cabinet:

Authorised the Assistant Director Assets & Environment to purchase the property in question, or if that should prove impractical, another property which delivers similar outcomes, in each case within the approved budget.

62. **West Northants Housing Allocations Function**

At the Chair's invitation Councillor Brown presented the report and outlined the salient points.

Councillors made the following comments:

- Concern was expressed about losing knowledge locally. It was important to bring the experience from the Housing Allocations team into any solution.
- Obtaining the right data was important to ensure people were placed in the most suitable accommodation.
- A single approach made sense but would create change. Reassurance was needed that those involved would be engaged in the transition.
- It was important that arms-length providers supplied information in a timely way.

Councillor Brown responded as follows:

- The concerns regarding the workforce were understood and the process would be undertaken sensitively.
- The integrity of data during transition was important – management of customer data needed to serve residents in the best way.
- Everyone needed to buy into the change management process and be trained effectively.
- The provision of more useful information and contacts for arms-length providers to ward members would be looked at.
- The consultation results were expected to be reported to Cabinet in November.

RESOLVED: Cabinet decided that an in-house team manage the housing allocations service and deliver the Council's single housing allocations scheme for West Northamptonshire.

63. **Acquisition of Broadmead Court**

At the Chair's invitation Councillor Brown presented the report. The opportunity had arisen for the council to acquire a building for 21 units of temporary accommodation. A government subsidy was available and the council had a duty to relieve homelessness. The current need was acute.

Further discussion and consideration of the recommendations was postponed to the private session which followed.

RESOLVED: That Cabinet;

- a) Approved the proposal to acquire Broadmead Court as outlined within exempt Appendix A subject to a red book valuation, satisfactory due diligence having been undertaken and approval by the S151 Officer of a fully costed business case to develop the property using either SHAP or Housing Revenue Account funding.
- b) Delegated authority to the Assistant Director of Assets and Environment in consultation with the S151 Officer, the Portfolio Holder for Housing, Culture and Leisure and the Portfolio Holder for Finance to negotiate and acquire Broadmead Court including completion of the legal requirements.
- c) Delegated authority to the Director of Communities and Opportunities to undertake a compliant procurement process and to enter into construction contracts, and any related bonds to develop Broadmead Court into self-contained flats to accommodate people with immediate housing and support needs

65. Four Waterside and Marefair - Appointment of Preferred Development Partner

At the Chair's invitation Councillor Lister presented the report seeking approval for the appointment of a development partner for the Four Waterside and Marefair development. The site had been empty for a significant length of time and there were 5 acres to be developed.

Further discussion and consideration of the recommendations was postponed to the private session which followed.

RESOLVED: that Cabinet:

- a) Subject to robust financial and other due diligence having been carried out in respect of Bidder 1 approved the selection of Bidder 1 as the preferred development partner for Four Waterside and Marefair having considered the detail set out within this report and exempt Appendix A.
- b) Noted the use of £1.5m of Towns Fund and £7m of Enterprise Zone grant funding that will be used for the delivery of this scheme.
- c) Delegated authority to the Director of Communities and Opportunities in consultation with the Executive Director for Finance, Director of Legal and Democratic and Cabinet Member for Economic Development, Town Centre Regeneration and Growth and Cabinet Member for Finance to negotiate and conclude the terms of and enter into, the Development Agreement and associated documents with the preferred bidder, in accordance with the Final Tender. This includes engaging with the preferred bidder to confirm financial commitments and other commercial terms through the finalisation of the Development Agreement and associated documents in accordance with the Final Tender and detailed Heads of Terms contained within it.
- d) Approved the recommendations set out in the Exempt Appendix A.

66. Private Session

In respect of the following items the Chair 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 resolved: "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".

67. Private Appendix - Item 13 Broadmead Court

This item was considered in private session.

68. Private Appendix - Item 14 - Four Waterside and Marefair

This item was considered in private session.

The meeting closed at 8.00 pm

Chair: _____

Date: _____



WEST NORTHAMPTONSHIRE COUNCIL

CABINET

14 NOVEMBER 2023

Cabinet Member For Adult Care, Wellbeing, And Health Integration: Councillor Matt Golby

Report Title	Report of the Adult Social Care and Health Overview and Scrutiny Committee – Integrated Care across Northamptonshire (iCAN) Scrutiny Review
Report Author	James Edmunds, Democratic Services Assistant Manager James.edmunds@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	11/10/2023
Chief Finance Officer (S.151)	Martin Henry	11/10/2023
Communications Lead/Head of Communications	Craig Forsyth	04/10/2023

List of Appendices

Appendix A – Report of the Adult Social Care and Health Overview and Scrutiny Committee scrutiny review of Integrated Care across Northamptonshire.

1. Purpose of Report

- 1.1. The report presents to the Cabinet for consideration the report and recommendations of the Adult Social Care and Health Overview and Scrutiny Committee scrutiny review of Integrated Care across Northamptonshire.

2. Executive Summary

- 2.1 The former People Overview and Scrutiny Committee established a task and finish panel to scrutinise the delivery of intended outcomes from the Integrated Care across Northamptonshire (iCAN) programme at key points during the period of the programme contract. iCAN was a joint health and social care transformation programme focussed on support for frail people over 65 years of age in the county.
- 2.2 The Task and Finish Panel met four times through 2022. The Panel took information from senior leaders involved in delivering the iCAN programme or working in related areas; representatives of the system transformation partner supporting delivery; representatives of service users; and other expert advisors. The scrutiny review was intended to run for a longer period but this was affected by a change in the delivery model for the iCAN programme in 2023. This made it logical for the Panel to report back on its conclusions and resulting recommendations at that point. In any case, the Panel's recommendations are focussed on future activity following on from the iCAN programme.
- 2.3 The Task and Finish Panel presented its report to the Adult Social Care and Health Overview and Scrutiny Committee on 14 September 2023. The final version of the report is set out at Appendix A.

3. Recommendations

- 3.1 It is recommended that the Cabinet:
- a) Agrees that the development of future support for people living with frailty in West Northamptonshire should not link frailty solely to age and should include appropriate provision for affected people below 65 years of age.
 - b) Agrees that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should include provision for residents living near the borders of Northamptonshire who are likely to be treated at hospitals in neighbouring areas.
 - c) Agrees that business cases for any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should be based on the principle that services are capable of being deployed at any time during the day and week.
 - d) Agrees that a feature of the development of new Local Area Partnerships in West Northamptonshire should be to look at how they link in with iCAN programme initiatives.
 - e) Agrees to a review of demographic projections informing the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme, in order to identify the effect of any differences between previous projections and actual Census 2021 information.
 - f) Agrees that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should ensure that actions to improve headline performance on length of stay in acute care do not result in worse outcomes for patients in practice.

- g) Agrees to seek confirmation from the appropriate authority that GP practices in West Northamptonshire are consistently contacting patients discharged from hospital within 48 hours as required by GP contracts and that action to reinforce compliance is taken where necessary.
- h) Agrees that re-admissions of frail older people to acute care should be included in data used to judge the effectiveness of the original iCAN programme and any future services supporting independent living for frail older people in West Northamptonshire following on from it.
- i) Agrees that the development of the iCAN Collaborative should ensure that the new organisational model does not lead to reduced accountability for the effectiveness of the services involved.
- j) Agrees that West Northamptonshire Council should arrange for all councillors to be provided with information about local community first responder schemes in their respective Local Area Partnership areas.

4. Reason for Recommendations

- 4.1 The recommendations resulting from the scrutiny review are intended to contribute to the development of effective services supporting independent living for frail older people in West Northamptonshire. This reflects the Overview and Scrutiny function's role for the development and review of policy.

5. Report Background

- 5.1 The purpose of this scrutiny review was to scrutinise the delivery of intended outcomes from the Integrated Care across Northamptonshire (iCAN) programme at key points during the period of the programme contract. iCAN was a joint health and social care transformation programme focussed on support for frail people over 65 years of age in the county. The programme was intended to produce benefits in terms of improved outcomes for residents, reduced operating costs and less reliance on acute hospital care through increased focus on community-based care, prevention and joint working within the care system.
- 5.2 The scope for the scrutiny review identified the following key lines of enquiry:
 - Can Overview and Scrutiny take confidence that the iCAN programme is delivering the outcomes that it is intended to achieve? iCAN is intended both to improve the experience that people have of health and social care in West Northamptonshire and also to deliver financial savings in the local health and social care system.
 - How is the overall assessment of progress made by the iCAN programme reflected in the lived experience of service users and staff members?
- 5.3 The choice of this topic for scrutiny by the former People Overview and Scrutiny Committee reflected the importance of supporting independent living and managing overall demand on acute hospital care. The Integrated Care Northamptonshire Strategy 2023-2033 "Live your Best Life" includes the ambition of providing access to health and social care when [people] need it, supported by the outcome that people are supported to live at home for as long as possible and

only spend time in hospital to meet medical needs. iCAN remains one of four focus areas for collaborative working in health and social care to deliver the Strategy.

- 5.4 The scrutiny review links to West Northamptonshire Council's corporate priority to improve the life chances of all residents and to the following specific aims:
- to support adults to live independent and self-sufficient lives for as long as possible
 - to provide support needed by people who are vulnerable or lack a support network
 - to work with the health sector in more integrated ways, ensuring our residents can "chase well, stay well and live well."
- 5.5 The intended outcome of the scrutiny review was to gain assurance about the outcomes being delivered by the iCAN programme and, if necessary, to make evidence-based recommendations to the West Northamptonshire Council Cabinet intended to assist in addressing any risks or areas of concern that may be identified.

6. Issues and Choices

- 6.1 The Cabinet is asked to consider the recommendations of the Adult Social Care and Health Overview and Scrutiny Committee and to provide a response to them to the Committee. The West Northamptonshire Council constitution states that the Cabinet shall consider a report submitted by an Overview and Scrutiny Committee at the next available Cabinet meeting. The Cabinet shall respond to the Overview and Scrutiny Committee within two months of the report being submitted.
- 6.2 The key findings, conclusions and recommendations from the scrutiny review are set out in this section of the report.

Focus of the iCAN programme

- 6.3 The Task and Finish Panel recognised that the iCAN programme was set up to focus on improving support for a specific group of people in the local population – frail adults over 65 years of age – in order both to improve their health outcomes and to make better use of available resources and reduce demand on acute care in Northamptonshire. At the same time, the Panel wishes to make the point that more general work on frailty should not be linked solely to age. A person's physical condition is not determined solely by their age: many people over 65 years of age are not frail and some people affected by frailty are below this age. The Panel encourages that this principle is taken into account appropriately in the development of future support for people in West Northamptonshire who are living with frailty, building on the iCAN programme.
- 6.4 The Task and Finish Panel considered that focussing the iCAN programme on the two acute hospitals in Northamptonshire, although logical geographically, could risk people living near to the borders of the county being disadvantaged in relation to the standard of care available to them. The Panel noted, for example, that residents of South Northamptonshire are likely to access acute care in Oxfordshire, rather than at Northampton or Kettering general hospitals. People living in this area who are in the target group for the iCAN programme therefore may not benefit from it, as well as potentially being affected by other issues relating to joined-up working

or information-sharing that might result from receiving acute care from a different integrated care system. The Panel encourages that moving forward the iCAN programme and any related work that succeeds it should be focussed as far as possible on people (the services available to residents of Northamptonshire) rather than on place (the locations from which services are delivered).

- 6.5 Thirdly, the Task and Finish Panel commented that services intended to enable frail older people to remain living independently and to enable a more focussed use of acute care should ideally operate for 24 hours a day on 7 days a week. The Panel highlighted that people concerned about retaining their independence and their dignity could continue to live at home in difficulty until they reached a crisis point, which would not necessarily occur during business hours. If alternative provision was not available at this point they would come into acute care. The Panel therefore encourages that business cases for future services arising from the iCAN programme should be based on the principle that all services should be available 24/7.
- 6.6 Lastly, the Task and Finish Panel wishes to highlight that future development of iCAN support must be effectively linked in to the work of the nine new Local Area Partnerships (LAPs) to be established in West Northamptonshire. This should logically occur: iCAN is one of the priority areas in the Integrated Care Northamptonshire Strategy 2023 – 2033; the LAPs are an intrinsic part of the integrated care system structure that are intended to translate strategy into local action. The Panel recognises that the LAPs were not in place when the original iCAN programme was developed and implemented. The Panel therefore sees a benefit in reinforcing that this important connection must be made effectively.

Recommendations:

- A) The Cabinet to agree that the development of future support for people living with frailty in West Northamptonshire should not link frailty solely to age and should include appropriate provision for affected people below 65 years of age.
- B) The Cabinet to agree that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should include provision for residents living near the borders of Northamptonshire who are likely to be treated at hospitals in neighbouring areas.
- C) The Cabinet to agree that business cases for any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should be based on the principle that services are capable of being deployed at any time during the day and week.
- D) The Cabinet to agree that a feature of the development of new Local Area Partnerships in West Northamptonshire should be to look at how they link in with iCAN programme initiatives.

Outcomes delivered by the iCAN programme

- 6.7 The Task and Finish Panel welcomed examples of work under the iCAN programme having a positive impact on services that it was able to see as the scrutiny review progressed. In January 2022 the Panel noted that staff training at Kettering General Hospital had reduced the time taken to complete pre-discharge needs assessments of patients: the Panel considered that this was exactly the type of outcome that the programme should produce. In April 2022 the Panel was advised that front door trial projects at the two acute hospitals had enabled frailty teams to double the daily average number of patients seen. In September 2022 the Panel was advised that the average length of stay in hospital for people in the scope of the iCAN programme had been reduced by 1.63 days compared to April 2021, which was also producing a benefit of around 40,000 annual bed days across both acute hospitals. The Panel also noted that service-users were giving positive feedback about the practical difference being made by iCAN programme initiatives.
- 6.8 The challenge that the Task and Finish Panel experienced during the scrutiny review was gaining a clear picture of sustained positive outcomes from the iCAN programme in return for the resources committed to it, including the cost of the external system transformation partner Newton Europe. In part this reflected significant changes to the operating context for the programme during its implementation. It was highlighted to the Panel that the COVID-19 pandemic had occurred between the design and delivery of the programme and that the impact of the pandemic needed to be taken into account in assessing the outcomes being delivered by the programme. The Panel was advised in April 2022 that the acute care system was at that point outperforming the targets set in the original iCAN business case for attendances, admissions, length of stay and bed days and, overall, the number of acute care beds being used by non-elective patients over 65 years of age had fallen below the 2019 baseline. The Panel was advised that changes to ways of working made under the programme were contributing to this position but it had also been affected by the pandemic. The Panel subsequently heard in September 2022 that the acute care system in Northamptonshire was operating with fewer overall beds than anticipated when the programme had commenced, due to the pandemic and other factors, and that bed days being saved by the programme were covering this reduction. Therefore, the Panel could not accept there was clear evidence of sustained and positive outcomes.
- 6.9 The Task and Finish Panel was advised that the level of challenge faced by the acute care sector after the start of the iCAN programme had led to the need to increase its focus on contributing to system pressures in the immediate future rather than over the next five years. The context for the programme had also been changed with the publication of Census 2021 information in June 2022, which showed a large increase in the number of people over 65 years of age in Northamptonshire with the number of people of 70 years of age showing the most significant increase and going up faster than had been projected in the original iCAN business case.
- 6.10 The Task and Finish Panel raised the need for demographic projections informing the iCAN programme to be reviewed in order to identify whether the latest census data would affect the resources required for the programme and the savings it will deliver. The Panel makes the same point to West Northamptonshire Council in relation to any further phase of work carrying on from the original iCAN programme.

- 6.11 In addition, the Panel emphasises that assessment of the outcomes produced by iCAN initiatives must look at the patient experience behind improved headline-level performance. The Panel stated during the scrutiny review that performance on acute care bed occupancy and length of stay needed to be judged in the full context. A reduction in the number of people over 65 years of age attending hospital during the past year could be due to a range of factors in addition to the effect of iCAN. In turn, it would not be a positive outcome if vulnerable people were being discharged too soon. The Panel sought reassurance that discharge decisions were not based on an assumption that everyone had support in place to enable them to live independently. Decisions also needed to take account of ‘human factors’: some people at the point of being discharged from hospital could be too proud to say that they needed help or could just want to get back to their own homes. The Panel encouraged that, as far as possible, patients, families and carers should be involved in producing a patient’s post-discharge care plan and be informed about, and have confidence in, what would happen to the patient after they were discharged from acute care. There should also be an appropriate handover to any new organisation that would be providing care to a patient after they were discharged.
- 6.12 On a point related to care after discharge, the Task and Finish Panel was advised that people discharged from hospital should receive a phone call from their GP practice 48 hours afterwards to check their support needs and inform their care plan, which was a requirement in GP contracts. The Panel raised the need to check how consistently GPs in West Northamptonshire were meeting this requirement. Anecdotal information suggested this was not the case. The Panel also highlights the importance of monitoring the number of frail older people re-admitted to hospital and of including this as a measure when judging the effectiveness of the original iCAN programme and any further phase of work that builds on it.

Recommendations:

- E) The Cabinet to agree to a review of demographic projections informing the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme, in order to identify the effect of any differences between previous projections and actual Census 2021 information.
- F) The Cabinet to agree that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should ensure that actions to improve headline performance on length of stay in acute care do not result in worse outcomes for patients in practice.
- G) The Cabinet to agree to seek confirmation from the appropriate authority that GP practices in West Northamptonshire are consistently contacting patients discharged from hospital within 48 hours as required by GP contracts and that action to reinforce compliance is taken where necessary.
- H) The Cabinet to agree that re-admissions of frail older people to acute care should be included in data used to judge the effectiveness of the original iCAN programme and any future services supporting independent living for frail older people in West Northamptonshire following on from it.

Development of an iCAN collaborative

6.13 The Task and Finish Panel was given an overview in September 2022 of plans to develop iCAN using the 'collaborative' organisational model, as was the case for work in all four of Integrated Care Northamptonshire's priority areas. The collaborative model provides a legal framework for relevant organisations to work together in partnership to plan and deliver local services. The proposed establishment of collaboratives reflected the need to establish distinct programmes as permanent ways of working, to secure benefits achieved so far and develop a service delivery model that created the conditions for integrated working in the long term. The Panel was advised that the iCAN collaborative would be a structure to bring together staff working on common areas not an employing organisation. It was anticipated that the initial basis for joint working would be a memorandum of understanding, with the potential for delegation to a lead provider in future. The Panel considered that the joined up approach reflected in the iCAN collaborative was positive but emphasised that it should not result in reduced accountability, which could increase the risk of service delivery slipping or partnerships not operating affectively.

Recommendations:

- l) The Cabinet to agree that the development of the iCAN Collaborative should ensure that the new organisational model does not lead to reduced accountability for the effectiveness of the services involved.

iCAN and emergency medical response

6.14 The Task and Finish Panel recognised that the iCAN programme itself is not directly concerned with the emergency medical response element of the health system. At the same time, the Panel considered that it was valid to look at links between the two areas: part of the purpose of the iCAN programme was to manage the level of pressure on acute care in the county; one of the effects of this pressure could be to increase handover times for ambulances at acute hospitals, with consequent effects on emergency response capacity. The Panel was reassured to hear that Northamptonshire was in a better position than other parts of the East Midlands in terms of time spent by East Midlands Ambulance Service personnel waiting to hand over patients at the two acute hospitals in the county. The Panel also noted however this still left many patients in difficult positions and was far from perfect. The Panel welcomed feedback on the positive impact of particular initiatives that broadened the way in which emergency care could be provided or that supported independent living for frail older people, including work being done under the iCAN programme. The Panel therefore considered that taking a wider view helped to inform its understanding of the benefits that iCAN could produce.

6.15 When the Task and Finish Panel sought to consider the relationship between support for independent living and emergency medical response needs it touched on the contribution of community first responders: volunteers who are trained to attend certain types of emergency calls in their local areas to provide care before the arrival of more highly skilled medical professionals. The Panel noted the obvious benefit produced by community first responder schemes, particularly in rural areas where an ambulance may take longer to arrive. As a small practical outcome from this scrutiny review the Panel proposes that it would be beneficial for all

councillors to be provided with more information about schemes operating in their local areas, to inform them about a source of support for members of the community and, potentially, to enable them to encourage involvement in these schemes.

Recommendations:

- J) The Cabinet to agree that West Northamptonshire Council should arrange for all councillors to be provided with information about local community first responder schemes in their respective Local Area Partnership areas.

Conclusion of the scrutiny review

6.16 The Task and Finish Panel wishes to highlight that it has not been able to bring its work to as neat a conclusion as was set out in its original scope. After the Panel's last meeting in September 2022 a further meeting was scheduled in December 2022 but had to be postponed for practical reasons. Efforts were then made to schedule another Panel meeting in Spring 2023, before the Chair was advised that the programme had changed to a local authority-based delivery model, with a new lead officer. The Panel would have benefited from better communication about this situation, which contributed to producing a gap in its work and questions that it was still seeking to resolve about the outcomes delivered by the iCAN programme. Specific questions were outstanding around the cost of the programme to the Council so far and information on how the reported improvements had equated into financial savings as projected by the original reports. Given the changes affecting the subject of the scrutiny review, as well as recent changes to the operation of the Council's Overview and Scrutiny Function, the Chair took the view that it was most appropriate for the Panel to report back to the Adult Social Care and Health Overview and Scrutiny on the work it had completed and also enable the Committee to decide how it wished to proceed further on this topic. However, the Panel raises the need for the appropriate Overview and Scrutiny committee to seek a clearer picture than it has been able to obtain so far of the benefits generated by the iCAN programme in return for the resources committed to it by West Northamptonshire Council and in turn how these have benefitted residents and supported the live your best life priority.

Recommendations:

- K) The Overview and Scrutiny Triangulation Group to recommend that the appropriate Overview and Scrutiny committee(s) receive a report to a future meeting confirming:
- The total financial cost to West Northamptonshire Council of the iCAN programme to the end of 2022/23, including the cost of the system transformation partner
 - The positive outcomes directly resulting from the iCAN programme delivered to the end of 2022/23.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 Specific recommendations resulting from the scrutiny review may have resources and financial implications. The Cabinet should consider these implications when producing its response to the Adult Social Care and Health Overview and Scrutiny Committee as set out in paragraph 6.1 above.

7.2 Legal

7.2.1 The role of Overview and Scrutiny Committee 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.

7.3 Risk

7.3.1 The recommendations resulting from the scrutiny review are intended to contribute to mitigating risks associated with the provision of support to frail older people to assist them to live independently. The Task and Finish Panel sought to identify recommendations that are reasonable and practical in current circumstances. The Cabinet is able to give further consideration to risks that may be connected with implementing specific recommendations when producing its response to the Adult Social Care and Health Overview and Scrutiny Committee.

7.4 Consultation and Communications

7.4.1 The Task and Finish Panel heard from a range of expert advisors when gathering information for the scrutiny review, as set out in the final report.

7.5 Consideration by Overview and Scrutiny

7.5.1 The recommendations presented to the Cabinet are the result of a scrutiny review by an Overview and Scrutiny task and finish panel. The final report of the task and finish panel was considered and approved by the Adult Social Care and Health Overview and Scrutiny Committee on 14 September 2023.

7.6 Climate Impact

7.6.1 None directly relating to this report.

7.7 Community Impact

7.7.1 The recommendations resulting from the scrutiny review are intended to have a positive impact on frail older people and their families in all areas of West Northamptonshire.

8. Background Papers

People Overview and Scrutiny Committee agenda papers and minutes, 21 September 2021

People Overview and Scrutiny Committee work programme

Adult Social Care and Health Overview and Scrutiny Committee agenda papers and minutes, 27 June 2023

iCAN Task and Finish Panel agenda papers and notes, January 2022 – September 2022

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**West
Northamptonshire
Council**

**Adult Social Care and Health
Overview and Scrutiny Committee**

**Integrated Care across
Northamptonshire (iCAN)
Scrutiny Review**

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Chair's Foreword

I am pleased to present this report resulting from the work of the Task and Finish Panel set up by the former People Overview and Scrutiny Committee to scrutinise the results being produced by Integrated Care across Northamptonshire (iCAN).

iCAN was a joint health and social care transformation programme focussed on support for frail people over 65 years of age in the county. The programme was intended to help older people to remain living independently for longer, producing better health outcomes for them and helping to manage demand on acute hospital care. iCAN remains one of four priority areas of work for Integrated Care Northamptonshire.

The choice of this topic for scrutiny reflects West Northamptonshire Council's corporate priority to improve the life chances of all residents. The scrutiny review had the following key lines of enquiry:

- Can Overview and Scrutiny take confidence that the iCAN programme is delivering the outcomes that it is intended to achieve? iCAN is intended both to improve the experience that people have of health and social care in West Northamptonshire and also to deliver financial savings in the local health and social care system.
- How is the overall assessment of progress made by the iCAN programme reflected in the lived experience of service users and staff members?

I would like to thank the councillors who made up the Task and Finish Panel with me for their efforts and the professionals and patients' representatives who contributed information and views to the Panel.

The Task and Finish Panel gained a picture of positive actions delivered under the iCAN programme but was ultimately not able to reach a clear conclusion about the overall value added by the programme, in part due to changes to the operating context and to the focus and delivery of the programme during the scrutiny review. This may be an issue that the Adult Social Care and Health Overview and Scrutiny Committee wishes to take further. In any case, I hope that the recommendations presented here can still contribute to strengthening future services for residents of West Northamptonshire.



Councillor Emma Roberts
Chair, iCAN Task and Finish Panel

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

- Councillors Janice Duffy, Andre Gonzalez De Savage, Rosie Herring, Rosie Humphreys, Wendy Randall and Sue Sharps, who sat with me on the Panel.
- Senior leaders involved in the delivery of the iCAN programme or working in related areas: Kim Curry, iCAN Delivery Director; Katie Brown, Assistant Director Safeguarding and Wellbeing, West Northamptonshire Council; and Julie Curtis, Delivery Director Health and Care Integration, West Northamptonshire Council.
- Representatives from Newton Europe, the system transformation partner supporting delivery of the iCAN programme: Rosanne Furniss, Director; Adam Walker, Director; and Sam Newton, Business Manager.
- Members of the iCAN People Advisory Group: Mark Major (Chair), Alan Christie, Julie Thew and Sheila White.
- Senior leaders from East Midlands Ambulance Service: Michael Jones, Divisional Director Northamptonshire; Lee Brentnall, Divisional Senior Manager for Quality; and Martin Claydon, Head of Operations.

Executive Summary

The purpose of the scrutiny review was to scrutinise the delivery of intended outcomes from the Integrated Care across Northamptonshire (iCAN) programme at key points during the period of the programme contract. iCAN was a joint health and social care transformation programme intended to produce benefits in terms of improved outcomes for residents, reduced operating costs and less reliance on acute hospital care through increased focus on community-based care, prevention and joint working within the care system.

The scrutiny review links to West Northamptonshire Council's corporate priority to improve the life chances of all residents and to the following specific aims:

- to support adults to live independent and self-sufficient lives for as long as possible
- to provide support needed by people who are vulnerable or lack a support network
- to work with the health sector in more integrated ways, ensuring our residents can "chase well, stay well and live well."

The scrutiny review was carried out by a Task and Finish Panel of the People Overview and Scrutiny Committee across four meetings from January – September 2022. The scrutiny review was intended to run for a longer period but a change in the delivery model for the iCAN programme whilst the scrutiny review was underway made it logical for the Panel to report back on its findings at this point.

The Task and Finish Panel has considered the following matters during its work:

- iCAN programme aims and progress towards the delivery of intended outcomes at key 'stage gate' points in the programme contract
- How patients and service users were informing the iCAN programme and how the programme was affecting their experiences of services
- How the iCAN programme might affect, or be affected by, the provision of emergency first response in West Northamptonshire.

The information and comment that expert advisors provided to the Task and Finish Panel is set out in section 6 of this report below.

After all of the evidence was collated the Task and Finish Panel reached the following conclusions:

Focus of the iCAN programme

The Task and Finish Panel recognised that the iCAN programme was set up to focus on improving support for a specific group of people in the local population – frail adults over 65 years of age – in order both to improve their health outcomes and to make better use of available resources and reduce demand on acute care in Northamptonshire. At the same time, the Panel wishes to make the point that more general work on frailty should not be linked solely to age. A person's physical condition is not determined solely by their age: many people over 65 years of age are not frail and some people affected by frailty are below this age. The Panel encourages that this principle is taken into account appropriately in the

development of future support for people in West Northamptonshire who are living with frailty, building on the iCAN programme.

The Task and Finish Panel considered that focussing the iCAN programme on the two acute hospitals in Northamptonshire, although logical geographically, could risk people living near to the borders of the county being disadvantaged in relation to the standard of care available to them. The Panel noted, for example, that residents of South Northamptonshire are likely to access acute care in Oxfordshire, rather than at Northampton or Kettering general hospitals. People living in this area who are in the target group for the iCAN programme therefore may not benefit from it, as well as potentially being affected by other issues relating to joined-up working or information-sharing that might result from receiving acute care from a different integrated care system. The Panel encourages that moving forward the iCAN programme and any related work that succeeds it should be focussed as far as possible on people (the services available to residents of Northamptonshire) rather than on place (the locations from which services are delivered).

Thirdly, the Task and Finish Panel commented that services intended to enable frail older people to remain living independently and to enable a more focussed use of acute care should ideally operate for 24 hours a day on 7 days a week. The Panel highlighted that people concerned about retaining their independence and their dignity could continue to live at home in difficulty until they reached a crisis point, which would not necessarily occur during business hours. If alternative provision was not available at this point they would come into acute care. The Panel therefore encourages that business cases for future services arising from the iCAN programme should be based on the principle that all services should be available 24/7.

Lastly, the Task and Finish Panel wishes to highlight that future development of iCAN support must be effectively linked in to the work of the nine new Local Area Partnerships (LAPs) to be established in West Northamptonshire. This should logically occur: iCAN is one of the priority areas in the Integrated Care Northamptonshire Strategy 2023 – 2033; the LAPs are an intrinsic part of the integrated care system structure that are intended to translate strategy into local action. The Panel recognises that the LAPs were not in place when the original iCAN programme was developed and implemented. The Panel therefore sees a benefit in reinforcing that this important connection must be made effectively.

Outcomes delivered by the iCAN programme

The Task and Finish Panel welcomed examples of work under the iCAN programme having a positive impact on services that it was able to see as the scrutiny review progressed. In January 2022 the Panel noted that staff training at Kettering General Hospital had reduced the time taken to complete pre-discharge needs assessments of patients: the Panel considered that this was exactly the type of outcome that the programme should produce. In April 2022 the Panel was advised that front door trial projects at the two acute hospitals had enabled frailty teams to double the daily average number of patients seen. In September 2022 the Panel was advised that the average length of stay in hospital for people in the scope of the iCAN programme had been reduced by 1.63 days compared to April 2021, which was also producing a benefit of around 40,000 annual bed days across both acute hospitals.

The Panel also noted that service-users were giving positive feedback about the practical difference being made by iCAN programme initiatives.

The challenge that the Task and Finish Panel experienced during the scrutiny review was gaining a clear picture of sustained positive outcomes from the iCAN programme in return for the resources committed to it, including the cost of the external system transformation partner Newton Europe. In part this reflected significant changes to the operating context for the programme during its implementation. It was highlighted to the Panel that the COVID-19 pandemic had occurred between the design and delivery of the programme and that the impact of the pandemic needed to be taken into account in assessing the outcomes being delivered by the programme. The Panel was advised in April 2022 that the acute care system was at that point outperforming the targets set in the original iCAN business case for attendances, admissions, length of stay and bed days and, overall, the number of acute care beds being used by non-elective patients over 65 years of age had fallen below the 2019 baseline. The Panel was advised that changes to ways of working made under the programme were contributing to this position but it had also been affected by the pandemic. The Panel subsequently heard in September 2022 that the acute care system in Northamptonshire was operating with fewer overall beds than anticipated when the programme had commenced, due to the pandemic and other factors, and that bed days being saved by the programme were covering this reduction. Therefore, the Panel could not accept there was clear evidence of sustained and positive outcomes.

The Task and Finish Panel was advised that the level of challenge faced by the acute care sector after the start of the iCAN programme had led to the need to increase its focus on contributing to system pressures in the immediate future rather than over the next five years. The context for the programme had also been changed with the publication of Census 2021 information in June 2022, which showed a large increase in the number of people over 65 years of age in Northamptonshire with the number of people of 70 years of age showing the most significant increase and going up faster than had been projected in the original iCAN business case.

The Task and Finish Panel raised the need for demographic projections informing the iCAN programme to be reviewed in order to identify whether the latest census data would affect the resources required for the programme and the savings it will deliver. The Panel makes the same point to West Northamptonshire Council in relation to any further phase of work carrying on from the original iCAN programme.

In addition, the Panel emphasises that assessment of the outcomes produced by iCAN initiatives must look at the patient experience behind improved headline-level performance. The Panel stated during the scrutiny review that performance on acute care bed occupancy and length of stay needed to be judged in the full context. A reduction in the number of people over 65 years of age attending hospital during the past year could be due to a range of factors in addition to the effect of iCAN. In turn, it would not be a positive outcome if vulnerable people were being discharged too soon. The Panel sought reassurance that discharge decisions were not based on an assumption that everyone had support in place to enable them to live independently. Decisions also needed to take account of 'human factors': some people at the point of being discharged from hospital could be too proud to say that they needed help or could just want to get back to their own homes. The Panel encouraged that,

as far as possible, patients, families and carers should be involved in producing a patient's post-discharge care plan and be informed about, and have confidence in, what would happen to the patient after they were discharged from acute care. There should also be an appropriate handover to any new organisation that would be providing care to a patient after they were discharged.

On a point related to care after discharge, the Task and Finish Panel was advised that people discharged from hospital should receive a phone call from their GP practice 48 hours afterwards to check their support needs and inform their care plan, which was a requirement in GP contracts. The Panel raised the need to check how consistently GPs in West Northamptonshire were meeting this requirement. Anecdotal information suggested this was not the case. The Panel also highlights the importance of monitoring the number of frail older people re-admitted to hospital and of including this as a measure when judging the effectiveness of the original iCAN programme and any further phase of work that builds on it.

Development of an iCAN collaborative

The Task and Finish Panel was given an overview in September 2022 of plans to develop iCAN using the 'collaborative' organisational model, as was the case for work in all four of Integrated Care Northamptonshire's priority areas. The collaborative model provides a legal framework for relevant organisations to work together in partnership to plan and deliver local services. The proposed establishment of collaboratives reflected the need to establish distinct programmes as permanent ways of working, to secure benefits achieved so far and develop a service delivery model that created the conditions for integrated working in the long term. The Panel was advised that the iCAN collaborative would be a structure to bring together staff working on common areas not an employing organisation. It was anticipated that the initial basis for joint working would be a memorandum of understanding, with the potential for delegation to a lead provider in future. The Panel considered that the joined up approach reflected in the iCAN collaborative was positive but emphasised that it should not result in reduced accountability, which could increase the risk of service delivery slipping or partnerships not operating affectively.

iCAN and emergency medical response

The Task and Finish Panel recognised that the iCAN programme itself is not directly concerned with the emergency medical response element of the health system. At the same time, the Panel considered that it was valid to look at links between the two areas: part of the purpose of the iCAN programme was to manage the level of pressure on acute care in the county; one of the effects of this pressure could be to increase handover times for ambulances at acute hospitals, with consequent effects on emergency response capacity. The Panel was reassured to hear that Northamptonshire was in a better position than other parts of the East Midlands in terms of time spent by East Midlands Ambulance Service personnel waiting to hand over patients at the two acute hospitals in the county. The Panel also noted however this still left many patients in difficult positions and was far from perfect. The Panel welcomed feedback on the positive impact of particular initiatives that broadened the way in which emergency care could be provided or that supported independent living for frail older people, including work being done under the iCAN programme. The Panel therefore considered that taking a wider view helped to inform its understanding of the benefits that iCAN could produce.

When the Task and Finish Panel sought to consider the relationship between support for independent living and emergency medical response needs it touched on the contribution of community first responders: volunteers who are trained to attend certain types of emergency calls in their local areas to provide care before the arrival of more highly skilled medical professionals. The Panel noted the obvious benefit produced by community first responder schemes, particularly in rural areas where an ambulance may take longer to arrive. As a small practical outcome from this scrutiny review the Panel proposes that it would be beneficial for all councillors to be provided with more information about schemes operating in their local areas, to inform them about a source of support for members of the community and, potentially, to enable them to encourage involvement in these schemes.

Conclusion of the scrutiny review

The Task and Finish Panel wishes to highlight that it has not been able to bring its work to a neat conclusion as was set out in its original scope. After the Panel's last meeting in September 2022 a further meeting was scheduled in December 2022 but had to be postponed for practical reasons. Efforts were then made to schedule another Panel meeting in Spring 2023, before the Chair was advised that the programme had changed to a local authority-based delivery model, with a new lead officer. The Panel would have benefited from better communication about this situation, which contributed to producing a gap in its work and questions that it was still seeking to resolve about the outcomes delivered by the iCAN programme. Specific questions were outstanding around the cost of the programme to the Council so far and information on how the reported improvements had equated into financial savings as projected by the original reports. Given the changes affecting the subject of the scrutiny review, as well as recent changes to the operation of the Council's Overview and Scrutiny Function, the Chair took the view that it was most appropriate for the Panel to report back to the Adult Social Care and Health Overview and Scrutiny on the work it had completed and also enable the Committee to decide how it wished to proceed further on this topic. However, the Panel raises the need for the appropriate Overview and Scrutiny committee to seek a clearer picture than it has been able to obtain so far of the benefits generated by the iCAN programme in return for the resources committed to it by West Northamptonshire Council and in turn how these have benefitted residents and supported the live your best life priority.

Based on these conclusions, the Task and Finish Panel makes the following recommendations:

Focus of the iCAN programme

- A) The Cabinet to agree that the development of future support for people living with frailty in West Northamptonshire should not link frailty solely to age and should include appropriate provision for affected people below 65 years of age.
- B) The Cabinet to agree that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should include provision for residents living near the borders of Northamptonshire who are likely to be treated at hospitals in neighbouring areas.

- C) The Cabinet to agree that business cases for any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should be based on the principle that services are capable of being deployed at any time during the day and week.
- D) The Cabinet to agree that a feature of the development of new Local Area Partnerships in West Northamptonshire should be to look at how they link in with iCAN programme initiatives.

Outcomes delivered by the iCAN programme

- E) The Cabinet to agree to a review of demographic projections informing the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme, in order to identify the effect of any differences between previous projections and actual Census 2021 information.
- F) The Cabinet to agree that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should ensure that actions to improve headline performance on length of stay in acute care do not result in worse outcomes for patients in practice.
- G) The Cabinet to agree to seek confirmation from the appropriate authority that GP practices in West Northamptonshire are consistently contacting patients discharged from hospital within 48 hours as required by GP contracts and that action to reinforce compliance is taken where necessary.
- H) The Cabinet to agree that re-admissions of frail older people to acute care should be included in data used to judge the effectiveness of the original iCAN programme and any future services supporting independent living for frail older people in West Northamptonshire following on from it.

Development of an iCAN collaborative

- I) The Cabinet to agree that the development of the iCAN Collaborative should ensure that the new organisational model does not lead to reduced accountability for the effectiveness of the services involved.

iCAN and emergency medical response

- J) The Cabinet to agree that West Northamptonshire Council should arrange for all councillors to be provided with information about local community first responder schemes in their respective Local Area Partnership areas.

Conclusion of the scrutiny review

- K) The Overview and Scrutiny Triangulation Group to recommend that the appropriate Overview and Scrutiny committee(s) receive a report to a future meeting confirming:
 - The total financial cost to West Northamptonshire Council of the iCAN programme to the end of 2022/23, including the cost of the system transformation partner
 - The positive outcomes directly resulting from the iCAN programme delivered to the end of 2022/23.

Assessing the impact of the scrutiny review

- L) The Adult Social Care and Health Overview and Scrutiny Committee to agree to review the impact of the scrutiny review six months after the presentation of the final report to decision-makers.

West Northamptonshire Council

Adult Social Care and Health Overview and Scrutiny Committee

Report of the iCAN Task and Finish Panel

1. Purpose and Rationale

- 1.1 The purpose of the scrutiny review was to scrutinise the delivery of intended outcomes from the iCAN programme at key points during the period of the programme contract. iCAN was a joint health and social care transformation programme intended to produce benefits in terms of improved outcomes for residents, reduced operating costs and less reliance on acute hospital care through increased focus on community-based care, prevention and joint working within the care system.

2. Key Lines of Enquiry

- Can Overview and Scrutiny take confidence that the iCAN programme is delivering the outcomes that it is intended to achieve? iCAN is intended both to improve the experience that people have of health and social care in West Northamptonshire and also to deliver financial savings in the local health and social care system.
- How is the overall assessment of progress made by the iCAN programme reflected in the lived experience of service users and staff members?

A copy of the scope of the Scrutiny Review is attached at Appendix A.

3. Context and Background

- 3.1 The People Overview and Scrutiny Committee at its meeting on 21 September 2021 scrutinised the progress made with the development of iCAN and the position on key risk factors that could affect delivery of the programme. As a result of this item of business the Committee agreed to establish a Task and Finish Panel to provide further oversight of the delivery of iCAN programme outcomes, linked to the gateway review points in the contract. The Task and Finish Panel comprised Councillor Emma Roberts (Chair) and Councillors Janice Duffy, Councillor Andre Gonzalez De Savage, Rosie Herring, Rosie Humphreys, Wendy Randall and Sue Sharps.
- 3.2 The iCAN Task and Finish Panel carried out its work across four meetings on 26 January, 27 April, 8 July and 27 September 2022. The Panel was due to meet again on 19 December 2022 but this meeting had to be postponed due to ill-health and other factors that prevented participants from attending. Efforts were then made to schedule another Panel meeting in Spring 2023, before it was confirmed to the Chair at the end of April that the iCAN programme had changed to a local authority-based delivery model. In light of this significant change to the previous programme, the gap in Panel meetings, and the impending changes to Overview and Scrutiny, the Chair

took the view that it was most appropriate for the Panel to report back to the Adult Social Care and Health Overview and Scrutiny on the work it had done and also enable the Committee to decide how it wished to proceed on this topic. The way in which the Panel’s work ultimately came to an end is the subject of further comment in section 7 of the report below.

4. Corporate Priorities

4.1 This scrutiny review links to the Council’s corporate priority to improve the life chances of all residents and to the following specific aims:

- to support adults to live independent and self-sufficient lives for as long as possible
- to provide support needed by people who are vulnerable or lack a support network
- to work with the health sector in more integrated ways, ensuring our residents can “chose well, stay well and live well.”

5. Background – rationale and aims of iCAN

5.1 iCAN is one of the four priority areas for Northamptonshire’s Integrated Care System. The Integrated Care Northamptonshire Strategy 2023 – 2033 sets out the following aims:

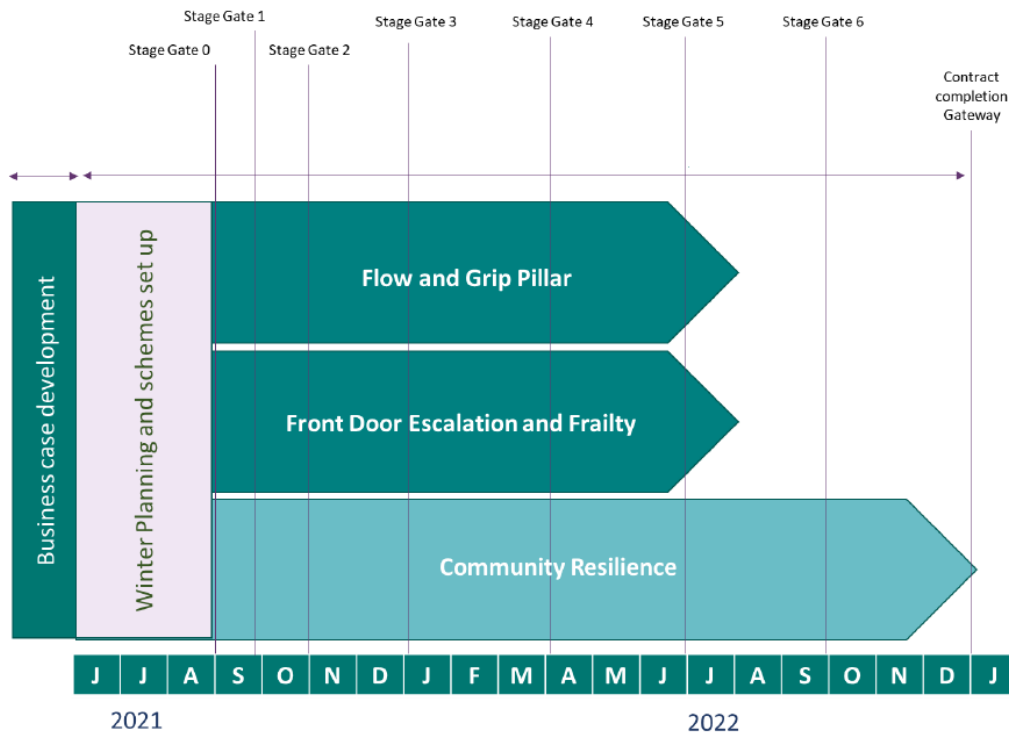
iCAN is about improving the quality of care on offer for older people in our county. We want to achieve the best possible health and wellbeing outcomes for older people and support them to stay independent for as long as possible. To meet the needs of adults over the age of 65, the elderly and those who are frail, the three core aims of the iCAN programme are to:

- *ensure we choose well: no one is in hospital without a need to be there*
- *ensure people can stay well*
- *ensure people can live well: by staying at home if that is right for them.*

5.2 The iCAN programme involved work on three focus areas, referred to as pillars:



5.3 The original timing for progression of the iCAN programme contact through key ‘stage gate’ points identified in September 2021 was as follows:



5.4 A report presented to the West Northamptonshire Council Cabinet in July 2021 seeking approval to commission an external system transformation partner to support delivery of the iCAN programme made the following points about the need for iCAN and the benefits it was intended to deliver, as they were understood at that time:

Our population is growing older and people are living longer with complex conditions. The number of people living in Northamptonshire is expected to grow from 741,000 in 2018 to 803,000 by 2028 – that’s an increase of more than 8% in 10 years. But for our elderly population there has been a steady increase in the over 65s of around 65% from 122,000 in 2014 to an anticipated 201,000 by 2034 and this its rising and faster than most other areas. We are also seeing a rise in mental health demand and the longer term implications of some of our health inequalities.

[...]

The Northamptonshire Health and Care system has been challenged over many years and this has been characterised by:

- *Too many people being admitted to our hospitals*
- *91 over 65s are admitted each day and this is increasing*
- *Patients staying too long and when they no longer need acute care*
- *Delays in discharging people*
- *Very high occupancy in our hospitals*
- *An inability to cope with any surge in demand and pressured winters*
- *Too much reliance on bed based solutions in hospital and on discharge*
- *Significant financial pressure on our budgets*

- *A lack of capacity in our facilities and workforce to meet the demand*
- *A knock on impact to social care in care costs and market capacity to meet the demand.*

[...]

iCAN is a joint initiative and builds on the transformation of Adult Social Care that was commenced in 2019. The iCAN programme would see the realisation of benefits across health and social care in terms of improved outcomes for residents, reduced operating costs and less reliance on acute hospital care as the focus shifts to more community based care, prevention and joint working.

We know that Acute hospital beds are extremely costly to maintain (at an estimated £200 a day) and when people stay too long, they have poor outcomes and increasing need for long term social care support. As a system we want to do more to care for more people at home, ensure they don't stay in hospital too long and that they are returned back to independence and their own homes. This is better for them, better for the hospitals and more cost effective too.

Whilst creating significant improvement to the experience people have of health and Social Care locally, the successful implementation of iCAN is also designed to deliver between £13.3m and £18m recurrent savings to the local Health and Social Care System.

- 5.5 A presentation given to the People Overview and Scrutiny Committee meeting on 21 September 2021 referred to in paragraph 3.1 above included the following points that further reinforced the importance of iCAN and of the outcomes it was intended to deliver:
- *iCAN is a priority because we recognise that frail and elderly care is the single biggest area of demand, activity, acute care, cost and performance improvement areas.*
 - *Without iCAN by 2025 the system of health and care risks being overwhelmed by increased demand. iCAN is critical to enabling the system to cope.*
 - *By 2024, the programme will be delivering a recurrent gross saving of £13.3m per year (stretch target of £18m).*

6. Information Collection

- 6.1 Expert advisors provided information and comment to the Task and Finish Panel at meetings on 26 January, 27 April, 8 July and 27 September 2022.
- 6.2 This section of the report sets out comments made by expert advisors to the Task and Finish Panel in each of the main areas considered during the scrutiny review. The Panel's own conclusions and recommendations are set out in section 7 of the report.
- 6.3 The date when expert advisors commented to the Task and Finish Panel is indicated in each case, to reflect that the subject of this scrutiny review was the development of, and the outcomes produced by, a specific programme over time.

iCAN programme aims and progress towards the delivery of intended outcomes at key 'stage gate' points in the programme contract

26 January 2022

Rosanne Furniss, Director, Newton Europe

- The overall picture regarding performance against high-level metrics for the iCAN programme was positive. Significant work was being done to look at how to measure practical outcomes from the patient perspective and incorporate these into the performance monitoring process.
- The number of people attending Accident and Emergency (A&E) departments was an indicator of the effect of the iCAN programme: if the programme was working the number should reduce. Performance was currently ahead of target but this was due to the effect of the COVID-19 pandemic. Before the pandemic there had been a rising trend in A&E attendances. The pandemic had resulted in a massive decrease in attendance, particularly amongst people aged over 65 years, which had not yet returned to a stable position.
- The number of people aged over 65 years admitted to hospital in Northamptonshire and the length of hospital stays were also currently ahead of target due to the effect of the pandemic.
- The number of days that a person aged over 65 years was in a hospital bed was a further performance indicator used for the iCAN programme. Prior to the pandemic this had been 25,000 bed days per month. The current figure was lower but needed to be analysed to check that it was due to the provision of support and not due to the pandemic.
- Work was being done on all of the performance metrics to ensure that they gave an informed view of the actual effect of iCAN programme measures. It was not being claimed that the programme had produced the apparent performance improvements seen at this point.
- Stage Gate 3 of the iCAN programme contract had been rescheduled to 1 March 2022. Work was currently being done on developing lower level metrics to produce a picture at this point that would quantify the operational impact of the iCAN programme on performance, as distinct from the impact of the pandemic and of national measures.
- The residential care and domiciliary care sectors were currently operating under considerable pressure. The iCAN programme would contribute to addressing this situation: fewer people entering acute care should reduce resulting demand on residential care. Work was being done with care providers to map the level of demand and capacity needed in the area and to build this into the long term care model, in order to ensure that sufficient capacity was available.
- The flow and grip pillar included work to improve the processes and timings for requesting long term care, which had already been reduced from 11.5 to 2.5 days.
- Current demands on paramedics were an example of why it was important that iCAN was a whole-system approach. The East Midlands Ambulance Service was

very involved in the programme. The level of demand on the care system made it necessary to look at how overall capacity and resources were deployed to best effect. The duration of the iCAN transformation programme reflected that it took time to re-balance existing arrangements.

- A complex discharge from hospital involved a needs assessment of the patient in order to set up an appropriate support package. Staff training on the assessment process at Kettering General Hospital had reduced the time taken to complete assessments. Performance at Northampton General Hospital was at a similar level but had been more consistent.
- A range of work was being done to improve information-sharing within the care system. The Northamptonshire Analytics Reporting Platform (NARP) was intended to give common access to information.

Assistant Director Safeguarding and Wellbeing

- There was sufficient residential care capacity in West Northamptonshire: staffing was the area of pressure.
- There was not a disparity in the time it took to place someone in residential care between local authority-funded and self-funded care.
- Northamptonshire was due to implement the Northamptonshire Care Record (NCR), an integrated care record across all health and care providers, in April 2022.
- Work was being done on supporting the domiciliary care market with the aim that West Northamptonshire Council funding to providers was directed to the workforce.
- The COVID-19 Omicron variant had produced a further impact on the care market and had highlighted more underlying issues about the state of the market and local authorities' approach to commissioning.
- Oxfordshire took a different approach to whole-system working than Northamptonshire. Discharge assessments for patients at the Horton Hospital in Banbury did go through Northamptonshire, although the effectiveness of the current approach needed to be assessed. The number of Northamptonshire residents admitted to hospital in Warwickshire was relatively small. The main cross-border issues for Northamptonshire related to Oxfordshire. Addressing these issues was part of future planning.
- There were challenges relating to care provision in South Northamptonshire, for example, regarding the availability of domiciliary care.
- The iCAN programme would assist in identifying and developing the amount of night-time care needed in West Northamptonshire.
- Multi-disciplinary teams providing wrap-around care had been operating across Northamptonshire since November 2021. The effect of this provision would be reviewed to identify if it was reducing overall demand or just dealing with the same demand in different ways. Wrap-around support for people discharged from hospitals at weekends was an area that needed further attention.

27 April 2022

iCAN Delivery Director

- Challenges arising since the start of the iCAN programme had resulted in the need to increase its focus on contributing to system pressures in the immediate future, not just over the next five years. Phase 2 of the programme beginning in May 2022 represented the foundation programme phase. It would focus on actions intended to have a significant impact on reducing attendances and admissions to acute care; reducing escalation in care needs; reducing the length of stay in acute care, building on existing improvements; improved use of support at home; and developing performance dashboards to give better oversight of performance.
- The five year route map for iCAN was still at the heart of the programme.

Business Manager, Newton Europe

- Community resilience pillar – There had been challenges at the end of 2021 due to work responding to the COVID-19 pandemic but strong elements of the new iCAN approach were already in place. Specific actions were having an impact and had produced positive feedback from service users. Additional provision had been made to mitigate a surge next winter.
- Frailty escalation and front door / Flow and grip pillars – Front door trial projects at the two acute hospitals had enabled frailty teams to double the daily average number of patients seen and enabled geriatricians to identify people who could continue to live at home with support. Work on flow and grip was helping to provide the right support to individuals to achieve the best outcomes.
- The health system was currently exceeding the targets in the original iCAN business case for attendance: overall, the number of beds being used by non-elective patients over 65 years of age was below the 2019 baseline. New ways of working introduced under the iCAN programme were contributing to this, but performance had also been affected by the pandemic.
- The front door trial projects currently operated for 8 hours a day on 5 days a week. The trial was intended to demonstrate their impact. This would inform a business case for the future, which might include extending the operating time.
- People who were frail were identified at the front door of the acute system using a frailty assessment process and by a specialist frailty clinician.
- All iCAN programme metrics had improved since the baselines were originally set in 2019. Oversight of performance was being developed, for example, by adding key performance indicators on patients classed as 'stranded' (in hospital for 7 days or more) and 'super stranded' (in hospital for 21 days or more) and enhancing focus on patients' reasons to reside in hospital.

8 July 2022

iCAN Delivery Director

- The context for the iCAN programme had changed in that Census 2021 information now available showed a large increase in the number of people over 65 years of age in Northamptonshire. The number of people over 70 years of age had the most significant increase and was going up faster than had been projected in the original iCAN business case.
- A new phase of the iCAN programme was designed to bridge the gap between short- and long term demand.
- Forecasts for delivery against the three main iCAN metrics showed a slight upward trend, which reinforced the importance of contextualising the programme effectively. Activity was expected to move back more towards pre-pandemic levels and there needed to be a good picture of how the programme was affecting this, informed by both high level data and the bottom up view.
- Positive outcomes were being seen. Waiting times at Kettering General Hospital for patients to be discharged had been reduced. Throughput for CT scans had improved and was actually ahead of trajectory at the current time.
- Collaborative work being done to improve the intermediate care discharge pathway was a crucial aspect of overall work to improve community pathways, particularly given long term demand. This was an exciting piece of collaboration that had been identified through the iCAN programme.
- The ICS model required the formation of provider collaboratives to address inequalities in health outcomes and improve service effectiveness. The iCAN programme was one of the priorities for the Northamptonshire ICS. It was necessary for it to develop from a transformational programme to a collaborative by April 2023, which would involve a significant amount of work.
- There was a clear picture of how working as a collaborative should assist in addressing priority issues relating to hospital admissions and stays, maximising independent living and making best use of available resources.
- The direction of travel against the key metrics was as anticipated: performance would worsen before it improved. The challenge was that the pandemic had occurred between the design and delivery of the iCAN programme.
- The Stage Gate 4 review point had been delayed to allow further work to review operational forecasts for the key iCAN metrics to reflect the current context.
- It was not currently expected that changes in the operating context of the iCAN programme would change associated spending or savings.
- Work on improving community pathways was focussed exactly on understanding what capacity was needed in Northamptonshire for home care packages and how this could be provided.

27 September 2022

Adam Walker, Director, Newton Europe

- The total annual bed days for each of Northampton General Hospital and Kettering General Hospital was approximately 200,000.
- The total acute care bed base in Northamptonshire was approximately 1,200 beds across Northampton General Hospital and Kettering General Hospital. Between the initial diagnostic that informed iCAN and the start of the iCAN programme this had been reduced by 180 beds: 72 beds had been lost due to COVID-19 infection control measures and 108 for other reasons. The first 72 beds had now been returned to the base but the acute care system was still operating with 108 fewer beds than anticipated when the iCAN programme had started. The iCAN programme was now saving enough bed days to cover this reduction, which was why performance was green-rated but the practical impact of this seemed less apparent.
- When hospitals were operating with 90% bed occupancy it affected patient flow and this would filter back to A&E.
- The iCAN programme ultimately should contribute to reducing delays at A&E by reducing demand for hospital services.
- Triangulation was a central part of assessing iCAN outcomes. The process used both headline level data and a more granular level of detail about the impact of different workstreams, which was also compared with feedback from patients about their experience of services.
- It was understandable that green-rated performance did not seem to be reflected in perceptions of the situation on the ground at this point. The iCAN programme had enabled the care system in Northamptonshire to recover some ground but there was still a long way to go.
- The iCAN programme was not intended to deliver cashable savings. It was designed to prevent demand from overwhelming the care system.
- The system had performed well to achieve a length of stay reduction of 1.63 days against the targeted reduction of 0.28 days. However, there was a challenge resulting from the high starting baseline: before the iCAN programme had started the average length of stay in Northamptonshire was 9-10 days. Further improvement was possible. Kettering General Hospital was performing slightly better than Northampton General Hospital.
- Assessments by the Complex Discharge Hub as well as social care assessments provided assurance that patients returning to their own homes had the capability and the appropriate support arrangements to resume independent living. Monitoring readmissions also helped to identify any causes for concern. The position on readmissions in Northamptonshire was largely steady, although the impact of the COVID-19 pandemic still needed to be fully understood.
- Complex discharge pathway 1 involved a person returning to their own home with support. Pathway 2 involved rehabilitation provided in a setting such as a

community hospital and the use of Discharge to Assess beds. Pathway 3 involved residential and long term nursing care.

- The position in Northamptonshire concerning the length of time between a person being medically fit for discharge from hospital and starting their care package in complex discharge cases was not typical of the national position. The average figure could disguise significant variances. There was the capacity in Northamptonshire to maintain inputs and outputs: the challenge was a backlog in cases. Services had been redesigned to address this, which had led to a short term loss of capacity for pathway 1 but would ultimately increase capacity by 30% for no extra cost. This would require 3 months to come into effect.
- Capacity at pathway 2 would be enhanced by work to develop Turn Furlong Specialist Care Centre in Northampton as an integrated facility, which would increase throughput.
- Work on complex discharge should bring the average delay down to 3-5 days, which was more typical of the national position. The national target was only 3 hours, which raised the question of whether this was an appropriate target. The potential impact of the current economic climate on capacity in the care market also created risks to the provision of ongoing care as part of pathways 1 and 2.
- The flow and grip pillar of the iCAN programme focussed on addressing issues that could hold up hospital discharges. Wards and processes had been reviewed to identify opportunities to improve. There were still issues with discharge at weekends. Hospitals had used the Patient Time Matters data tracker for the past 6 months to track the cumulative effect of delays. This had contributed to improving performance.

iCAN Delivery Director

- The iCAN programme was already delivering positive outcomes, in the context of an ageing local population. These included reducing the average length of stay in hospital by two days compared to April 2021, which was an impressive achievement, and producing a benefit of around 40,000 annual bed days. Positive feedback was also being received from service-users.
- Performance in key areas of work was largely green-rated at the Gateway 4 point for both trajectories and plans. Areas for improvement were reviewed and addressed: performance on Northampton General Hospital diagnostics had been reviewed to identify why targets were not being met, resulting in a re-baselining whilst retaining the overall aim.
- There had been considerable debate amongst system leaders about why the current situation on the ground did not feel more different than it was. The situation reflected current challenges in areas including workforce, GP retention and increasing demand on Kettering General Hospital to 2024.
- The Patient Advisory Group was currently carrying out a significant piece of work on patient experience, which could help to identify any issues with discharge decisions and patients' ability to return to independent living.

- The discharge planning process should identify if a patient had no family members nearby or similar support network and arrange for appropriate support. It was not assumed that a person would have someone to care for them.
- The iCAN programme and other Integrated Care Northamptonshire programmes were now moving towards becoming collaboratives. This was about establishing specific programmes as permanent ways of working. Developing the iCAN Collaborative was a complex area of work due to the number of partners and contracts involved.
- The Integrated Care Board (ICB) on 18 August 2022 had considered the case for change and the outline plan to establish iCAN as a collaborative by April 2023. The business case had been discussed with a range of partners. Development of the iCAN Collaborative was now at the stage of securing system agreement to the case for change and starting to develop shadow governance arrangements and operational delivery plans. The final stage of the process would involve reaching any formal collaborative, contractual or delegation agreements required.
- A pragmatic approach was being taken to the development of the proposed operating model and scope of services for the iCAN Collaborative. The services to be included in the Collaborative would be built up in tranches. The first tranche would be largely made up of services that were already funded through the Better Care Fund to provide a good foundation. Development was focussing on shared points of access, integrated community-based multi-disciplinary teams and integrated discharge and intermediate care. This would feed into winter and surge planning and response.
- The iCAN Collaborative case for change was focussed on how it would produce better outcomes for all concerned. Patients would benefit from greater focus on prevention and on support for independent living, a greater understanding of alternative options available to them and easier access.
- There was currently no intention to TUPE-transfer staff as part of developing the iCAN Collaborative. The Collaborative was a structure rather than an organisation to which staff could be transferred.
- Development of the iCAN Collaborative would include working through any human resources aspects involved, supported by appropriate specialist advice. All collaboratives would need to do this.
- There was not a national deadline to set up collaboratives. It was an ambition to establish the iCAN Collaborative by April 2023.
- The ICB would be accountable for the iCAN Collaborative whilst partners would also still be subject to their own statutory obligations. It would be important to develop effective governance arrangements for the Collaborative, which would be assisted by taking a co-production approach.

Delivery Director Health and Care Integration

- People discharged from hospital should receive a phone call from their GP practice 48 hours afterwards to check their support needs and inform their care plan. This was a requirement in GP contracts.
- The iCAN Collaborative aimed to bring together staff working on common areas not to change the organisation employing them. It was anticipated that the initial basis for joint working would be a memorandum of understanding. There was the potential for delegation to a lead provider but that had not been discussed yet.

How patients and service users were informing the iCAN programme and how the programme was affecting their experiences of services

27 April 2022

iCAN Delivery Director

- The 10 principles for how Integrated Care Systems (ICSs) should work with people and communities formed the basis for the way in which iCAN was operating. The People Advisory Group (PAG) was being used to provide early engagement. Co-production was central to iCAN and the PAG and Overview and Scrutiny could provide constructive challenge on how well the programme was doing on this. It was also important to ensure that iCAN was a learning programme.
- Neighbourhood and collaborative design was a focus for all ICS workstreams. The ICS model represented the best opportunity to achieve the long-held aim of providers working together to deliver seamless services.

Chair, iCAN People Advisory Group

- The iCAN programme involved the highest level of partnership working and collaboration that he had seen in his own 30 years of experience in relevant fields in Northamptonshire.
- The People Advisory Group (PAG)'s key focus areas were to provide oversight and challenge on the iCAN programme and to contribute to co-production. It had a significant amount of expert knowledge in this regard. The PAG could also carry out the same functions on other areas of work: for example, it was currently contributing to work by West Northamptonshire Council and North Northamptonshire Council on regulated care.
- Service users were giving positive feedback on services introduced as part of the iCAN programme, including multi-disciplinary crisis response teams and the countywide befriending service. By the end of 2022 there were due to be four community asset programmes running in the county supporting people with different long term conditions.
- The iCAN programme had extra surge funding that was being used on projects to support pressure in the acute hospitals. Additional staff had been provided in A&E to identify the best treatment and support options for people. Work was also being

done to support discharge from hospital by addressing issues that could prevent a person who was clinically well enough to be discharged from leaving hospital, such as a need for adaptations to be fitted in their home to enable them to live independently.

- Councillors should be assured that the iCAN programme involved good initiatives that were making a difference in practice, although there remained much more to do. Councillors could help to inform future work and to suggest potential priorities within this. The PAG had already highlighted end-of-life care as an area that needed attention in Northamptonshire, to improve the consistency of care and the outcomes that were achieved.
- The iCAN programme involved scaling up the provision of remote monitoring equipment in Northamptonshire.
- Northamptonshire needed to have a plan to get sufficient carers to meet local needs. 10 per cent of the population of Northamptonshire were carers. The PAG could contribute to any work by local authorities on this matter.
- It was important to invest in community-based solutions to healthcare needs: not doing so was a false economy. Care planning and patient handovers did not represent significant costs but would have an impact if not done effectively. Helping patients in hospital to eat was a role that could be done by local volunteers, provided that the need for it was identified and supported.

Alan Christie, iCAN People Advisory Group member

- He was the full-time carer for his wife who had multiple sclerosis. They had benefitted from having a monitor at home that measured his wife's blood pressure, temperature and oxygenation level. When difficulties occurred Mr Christie could pass on this information to help medical professionals to decide what intervention was required.
- He had been able to monitor his wife's breathing when she had caught COVID-19, which had meant she had not needed to be admitted to hospital.
- A monitor cost around £60.00 and was literally a life-saver, as well as reducing the need for hospital admissions.
- The last time his wife was admitted to hospital he had arranged for her carers to go in to help care for and feed her. This had helped to maintain the continuity of her care.
- Hospitals were better at treating patients than at caring for them. He had seen cases of patients who were not able to feed themselves being left with a meal.

Sheila White, iCAN People Advisory Group member

- Her main concern in relation to local health services was the different levels of access currently offered by GPs. A consistent approach across all surgeries would help members of the public.

- Communication was key to effective service delivery. There was a difference between offering a consistent level of service to all and ensuring that people were aware of the services available to them.

Julie Thew, iCAN People Advisory Group member

- She was a carer for two adults who lived at different addresses. Carers played a key role in the health and social care system but were not given much attention when the question of what good care looked like was being considered.
- The iCAN programme aims of enabling people to remain in, or return to, their own homes rather than staying in hospital would be affected if carers were not available.

8 July 2022

Chair, iCAN People Advisory Group

- The PAG was intended to promote co-production and work being done through iCAN in which it was involved was receiving good feedback from patients and carers. The PAG also contributed to wider areas of work such as a bid for community diagnostic centres in Northamptonshire.
- Key messages resulting from PAG meetings were shared with the senior leadership of the iCAN programme.
- A considerable amount of case study work was done on successful outcomes and lessons that could be learnt from experience.
- The PAG was seen as an example of good practice operating in Northamptonshire.

How the iCAN programme might affect, or be affected by, the provision of emergency first response in West Northamptonshire.

8 July 2022

Divisional Director Northamptonshire, East Midlands Ambulance Service

- East Midlands Ambulance Service (EMAS) received 490 calls per day in Northamptonshire. An ambulance did not need to be sent to 50-60% of the total calls received.
- EMAS had 450 staff based in Northamptonshire, an increase of 30% in the past 3 years, and 8 ambulance stations.
- From 17 to 42 double-crewed ambulances were sent out each day.
- The COVID-19 pandemic had produced unprecedented demands on capacity. The number of category 1 ambulance calls, involving an immediate response to a life-threatening condition, had increased by 27% in the second lockdown. This was a whole-system issue. Extra resources provided by the government were not sufficient to counterbalance increased demand.

- Northamptonshire was in a better position than other parts of the East Midlands in terms of hours lost by EMAS waiting at hospitals. There had recently been 30 ambulances waiting for 7-8 hours at a hospital in Leicester and a similar situation in north Lincolnshire. When delays were experienced in Northamptonshire partners were able to work together to get things moving again.
- Northamptonshire was the smallest of EMAS's divisions and performed the best on non-conveyance.

Head of Operations, East Midlands Ambulance Service

- The patients seen by EMAS were more poorly than in the past.
- EMAS had a non-conveyance rate of 50-60%. In these cases, patients were passed to the clinical assessment team and given advice over the phone, given advice in-person by EMAS personnel, or transported to a non-acute location to receive help.
- Current attendances were down 10% compared to the previous year. This reflected the Hear and Treat and See and Treat model, which involved dealing with more cases on the phone and at the scene where possible.
- Delays handing over patients at hospitals affected EMAS's ability to respond to demand. It worked with acute trusts to manage this issue as far as possible. EMAS lost 16,000 hours waiting at hospitals, including 1,178 hours in Northamptonshire. When there were delays in handover EMAS worked with acute trusts to maintain the minimum care standards for patients. This could involve hospital staff going out to treat patients waiting in ambulances. Rapid handover bed could be needed to release ambulances.

Divisional Senior Manager for Quality, East Midlands Ambulance Service

- EMAS had a system in place to manage the risk of harm to critically ill patients from delays. This made provision for staff on the scene to report back that a delay should be reviewed if it would cause potential harm to the patient. The NHS commissioner carried out harm reviews of selected cases involving a delayed response as part of quality control mechanisms. Members of the public could give feedback about services through the Patient Advice and Liaison Service. EMAS had a robust overall approach.
- In his experience in his current post since August 2021 the iCAN programme had been very productive. Good progress had been made with frailty support. The new operating model for adult social care in Northamptonshire was embedded and there was not a risk of reverting to old approaches.
- There was a consistent approach across Northamptonshire to the provision of same day emergency care (SDEC), which involved medical care being provided to patients who would otherwise need to be admitted to hospital. Kettering General Hospital and Northampton General Hospital had been operating SDEC for several years. EMAS crews' knowledge of it had been increased over the past 9 months. Direct pathways were also now available for patients including those with cardiac and stroke conditions.

- Work on falls prevention would help to reduce ambulance call-outs. The approach to falls now looked at different options for care to meet a patient's needs. For example, a person who had had a single fall might be better served by receiving orthopaedic treatment rather than needing to attend A&E.
- The yellow bracelet scheme – a bracelet containing a patient's medical records, which could be scanned by medical personnel – and EMAS crews being able to use tablets to access medical records remotely supported a more effective response.
- Kettering General Hospital already had a frailty unit and Northampton General Hospital was just developing one. EMAS did not currently have direct access to frailty units but had a contact in each unit. This meant that a frail patient taken to A&E could be collected from there by staff from the unit rather than waiting in A&E, which could have a negative effect.
- A new assessment process had been set up for patients who had experienced a minor fall. A nurse in the EMAS control room could assess these patients, enabling them to be passed directly to iCAN and support put in place from the Intermediate Care Team (ICT). This approach was diverting 1-2 patients per day from needing to be taken to hospital.
- There was now provision for patients needing same day surgical care to be taken directly to the relevant surgical unit for issues such as abdominal pain. Work was also being done on community solutions for urology and catheter issues, which would reduce demand on both EMAS and A&E.
- National guidance on SDEC produced by NHS England was used as the basis for triage decisions. The paramedic attending a call and the SDEC divisional leader would make a joint decision about where to take a patient. There was confidence in the process used.

7. Key Findings, Conclusions and Recommendations

- 7.1 After all of the evidence was collated the Task and Finish Panel reached the conclusions set out in this section of the report.

Focus of the iCAN programme

- 7.2 The Task and Finish Panel recognised that the iCAN programme was set up to focus on improving support for a specific group of people in the local population – frail adults over 65 years of age – in order both to improve their health outcomes and to make better use of available resources and reduce demand on acute care in Northamptonshire. At the same time, the Panel wishes to make the point that more general work on frailty should not be linked solely to age. A person’s physical condition is not determined solely by their age: many people over 65 years of age are not frail and some people affected by frailty are below this age. The Panel encourages that this principle is taken into account appropriately in the development of future support for people in West Northamptonshire who are living with frailty, building on the iCAN programme.
- 7.3 The Task and Finish Panel considered that focussing the iCAN programme on the two acute hospitals in Northamptonshire, although logical geographically, could risk people living near to the borders of the county being disadvantaged in relation to the standard of care available to them. The Panel noted, for example, that residents of South Northamptonshire are likely to access acute care in Oxfordshire, rather than at Northampton or Kettering general hospitals. People living in this area who are in the target group for the iCAN programme therefore may not benefit from it, as well as potentially being affected by other issues relating to joined-up working or information-sharing that might result from receiving acute care from a different integrated care system. The Panel encourages that moving forward the iCAN programme and any related work that succeeds it should be focussed as far as possible on people (the services available to residents of Northamptonshire) rather than on place (the locations from which services are delivered).
- 7.4 Thirdly, the Task and Finish Panel commented that services intended to enable frail older people to remain living independently and to enable a more focussed use of acute care should ideally operate for 24 hours a day on 7 days a week. The Panel highlighted that people concerned about retaining their independence and their dignity could continue to live at home in difficulty until they reached a crisis point, which would not necessarily occur during business hours. If alternative provision was not available at this point they would come into acute care. The Panel therefore encourages that business cases for future services arising from the iCAN programme should be based on the principle that all services should be available 24/7.
- 7.5 Lastly, the Task and Finish Panel wishes to highlight that future development of iCAN support must be effectively linked in to the work of the nine new Local Area Partnerships (LAPs) to be established in West Northamptonshire. This should logically occur: iCAN is one of the priority areas in the Integrated Care Northamptonshire Strategy 2023 – 2033; the LAPs are an intrinsic part of the integrated care system

structure that are intended to translate strategy into local action. The Panel recognises that the LAPs were not in place when the original iCAN programme was developed and implemented. The Panel therefore sees a benefit in reinforcing that this important connection must be made effectively.

Recommendations:

- A) The Cabinet to agree that the development of future support for people living with frailty in West Northamptonshire should not link frailty solely to age and should include appropriate provision for affected people below 65 years of age.
- B) The Cabinet to agree that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should include provision for residents living near the borders of Northamptonshire who are likely to be treated at hospitals in neighbouring areas.
- C) The Cabinet to agree that business cases for any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should be based on the principle that services are capable of being deployed at any time during the day and week.
- D) The Cabinet to agree that a feature of the development of new Local Area Partnerships in West Northamptonshire should be to look at how they link in with iCAN programme initiatives.

Outcomes delivered by the iCAN programme

- 7.6 The Task and Finish Panel welcomed examples of work under the iCAN programme having a positive impact on services that it was able to see as the scrutiny review progressed. In January 2022 the Panel noted that staff training at Kettering General Hospital had reduced the time taken to complete pre-discharge needs assessments of patients: the Panel considered that this was exactly the type of outcome that the programme should produce. In April 2022 the Panel was advised that front door trial projects at the two acute hospitals had enabled frailty teams to double the daily average number of patients seen. In September 2022 the Panel was advised that the average length of stay in hospital for people in the scope of the iCAN programme had been reduced by 1.63 days compared to April 2021, which was also producing a benefit of around 40,000 annual bed days across both acute hospitals. The Panel also noted that service-users were giving positive feedback about the practical difference being made by iCAN programme initiatives.
- 7.7 The challenge that the Task and Finish Panel experienced during the scrutiny review was gaining a clear picture of sustained positive outcomes from the iCAN programme in return for the resources committed to it, including the cost of the external system transformation partner Newton Europe. In part this reflected significant changes to the operating context for the programme during its implementation. It was highlighted to the Panel that the COVID-19 pandemic had occurred between the design and delivery of the programme and that the impact of the pandemic needed to be taken into account in assessing the outcomes being delivered by the programme.

The Panel was advised in April 2022 that the acute care system was at that point outperforming the targets set in the original iCAN business case for attendances, admissions, length of stay and bed days and, overall, the number of acute care beds being used by non-elective patients over 65 years of age had fallen below the 2019 baseline. The Panel was advised that changes to ways of working made under the programme were contributing to this position but it had also been affected by the pandemic. The Panel subsequently heard in September 2022 that the acute care system in Northamptonshire was operating with fewer overall beds than anticipated when the programme had commenced, due to the pandemic and other factors, and that bed days being saved by the programme were covering this reduction. Therefore, the Panel could not accept there was clear evidence of sustained and positive outcomes.

- 7.8 The Task and Finish Panel was advised that the level of challenge faced by the acute care sector after the start of the iCAN programme had led to the need to increase its focus on contributing to system pressures in the immediate future rather than over the next five years. The context for the programme had also been changed with the publication of Census 2021 information in June 2022, which showed a large increase in the number of people over 65 years of age in Northamptonshire with the number of people of 70 years of age showing the most significant increase and going up faster than had been projected in the original iCAN business case.
- 7.9 The Task and Finish Panel raised the need for demographic projections informing the iCAN programme to be reviewed in order to identify whether the latest census data would affect the resources required for the programme and the savings it will deliver. The Panel makes the same point to West Northamptonshire Council in relation to any further phase of work carrying on from the original iCAN programme.
- 7.10 In addition, the Panel emphasises that assessment of the outcomes produced by iCAN initiatives must look at the patient experience behind improved headline-level performance. The Panel stated during the scrutiny review that performance on acute care bed occupancy and length of stay needed to be judged in the full context. A reduction in the number of people over 65 years of age attending hospital during the past year could be due to a range of factors in addition to the effect of iCAN. In turn, it would not be a positive outcome if vulnerable people were being discharged too soon. The Panel sought reassurance that discharge decisions were not based on an assumption that everyone had support in place to enable them to live independently. Decisions also needed to take account of 'human factors': some people at the point of being discharged from hospital could be too proud to say that they needed help or could just want to get back to their own homes. The Panel encouraged that, as far as possible, patients, families and carers should be involved in producing a patient's post-discharge care plan and be informed about, and have confidence in, what would happen to the patient after they were discharged from acute care. There should also be an appropriate handover to any new organisation that would be providing care to a patient after they were discharged.
- 7.11 On a point related to care after discharge, the Task and Finish Panel was advised that people discharged from hospital should receive a phone call from their GP practice 48

hours afterwards to check their support needs and inform their care plan, which was a requirement in GP contracts. The Panel raised the need to check how consistently GPs in West Northamptonshire were meeting this requirement. Anecdotal information suggested this was not the case. The Panel also highlights the importance of monitoring the number of frail older people re-admitted to hospital and of including this as a measure when judging the effectiveness of the original iCAN programme and any further phase of work that builds on it.

Recommendations:

- E) The Cabinet to agree to a review of demographic projections informing the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme, in order to identify the effect of any differences between previous projections and actual Census 2021 information.
- F) The Cabinet to agree that the development of any future services supporting independent living for frail older people in West Northamptonshire following on from the iCAN programme should ensure that actions to improve headline performance on length of stay in acute care do not result in worse outcomes for patients in practice.
- G) The Cabinet to agree to seek confirmation from the appropriate authority that GP practices in West Northamptonshire are consistently contacting patients discharged from hospital within 48 hours as required by GP contracts and that action to reinforce compliance is taken where necessary.
- H) The Cabinet to agree that re-admissions of frail older people to acute care should be included in data used to judge the effectiveness of the original iCAN programme and any future services supporting independent living for frail older people in West Northamptonshire following on from it.

Development of an iCAN collaborative

- 7.12 The Task and Finish Panel was given an overview in September 2022 of plans to develop iCAN using the ‘collaborative’ organisational model, as was the case for work in all four of Integrated Care Northamptonshire’s priority areas. The collaborative model provides a legal framework for relevant organisations to work together in partnership to plan and deliver local services. The proposed establishment of collaboratives reflected the need to establish distinct programmes as permanent ways of working, to secure benefits achieved so far and develop a service delivery model that created the conditions for integrated working in the long term. The Panel was advised that the iCAN collaborative would be a structure to bring together staff working on common areas not an employing organisation. It was anticipated that the initial basis for joint working would be a memorandum of understanding, with the potential for delegation to a lead provider in future. The Panel considered that the joined up approach reflected in the iCAN collaborative was positive but emphasised that it should not result in reduced accountability, which could increase the risk of service delivery slipping or partnerships not operating affectively.

Recommendations:

- I) The Cabinet to agree that the development of the iCAN Collaborative should ensure that the new organisational model does not lead to reduced accountability for the effectiveness of the services involved.

iCAN and emergency medical response

7.13 The Task and Finish Panel recognised that the iCAN programme itself is not directly concerned with the emergency medical response element of the health system. At the same time, the Panel considered that it was valid to look at links between the two areas: part of the purpose of the iCAN programme was to manage the level of pressure on acute care in the county; one of the effects of this pressure could be to increase handover times for ambulances at acute hospitals, with consequent effects on emergency response capacity. The Panel was reassured to hear that Northamptonshire was in a better position than other parts of the East Midlands in terms of time spent by East Midlands Ambulance Service personnel waiting to hand over patients at the two acute hospitals in the county. The Panel also noted however this still left many patients in difficult positions and was far from perfect. The Panel welcomed feedback on the positive impact of particular initiatives that broadened the way in which emergency care could be provided or that supported independent living for frail older people, including work being done under the iCAN programme. The Panel therefore considered that taking a wider view helped to inform its understanding of the benefits that iCAN could produce.

7.14 When the Task and Finish Panel sought to consider the relationship between support for independent living and emergency medical response needs it touched on the contribution of community first responders: volunteers who are trained to attend certain types of emergency calls in their local areas to provide care before the arrival of more highly skilled medical professionals. The Panel noted the obvious benefit produced by community first responder schemes, particularly in rural areas where an ambulance may take longer to arrive. As a small practical outcome from this scrutiny review the Panel proposes that it would be beneficial for all councillors to be provided with more information about schemes operating in their local areas, to inform them about a source of support for members of the community and, potentially, to enable them to encourage involvement in these schemes.

Recommendations:

- J) The Cabinet to agree that West Northamptonshire Council should arrange for all councillors to be provided with information about local community first responder schemes in their respective Local Area Partnership areas.

Conclusion of the scrutiny review

7.15 The Task and Finish Panel wishes to highlight that it has not been able to bring its work to as neat a conclusion as was set out in its original scope. After the Panel's last meeting in September 2022 a further meeting was scheduled in December 2022 but had to be postponed for practical reasons. Efforts were then made to schedule

another Panel meeting in Spring 2023, before the Chair was advised that the programme had changed to a local authority-based delivery model, with a new lead officer. The Panel would have benefited from better communication about this situation, which contributed to producing a gap in its work and questions that it was still seeking to resolve about the outcomes delivered by the iCAN programme. Specific questions were outstanding around the cost of the programme to the Council so far and information on how the reported improvements had equated into financial savings as projected by the original reports. Given the changes affecting the subject of the scrutiny review, as well as recent changes to the operation of the Council's Overview and Scrutiny Function, the Chair took the view that it was most appropriate for the Panel to report back to the Adult Social Care and Health Overview and Scrutiny on the work it had completed and also enable the Committee to decide how it wished to proceed further on this topic. However, the Panel raises the need for the appropriate Overview and Scrutiny committee to seek a clearer picture than it has been able to obtain so far of the benefits generated by the iCAN programme in return for the resources committed to it by West Northamptonshire Council and in turn how these have benefitted residents and supported the live your best life priority.

Recommendations:

- K) The Overview and Scrutiny Triangulation Group to recommend that the appropriate Overview and Scrutiny committee(s) receive a report to a future meeting confirming:
- The total financial cost to West Northamptonshire Council of the iCAN programme to the end of 2022/23, including the cost of the system transformation partner
 - The positive outcomes directly resulting from the iCAN programme delivered to the end of 2022/23.

Assessing the impact of the scrutiny review

- 7.16 It is good practice for Overview and Scrutiny to revisit issues that have been the subject of in-depth work, to assess how its recommendations have been implemented and what have outcomes they have produced.

Recommendations:

- L) The Adult Social Care and Health Overview and Scrutiny Committee to agree to review the impact of the scrutiny review six months after the presentation of the final report to decision-makers.

OVERVIEW AND SCRUTINY

TASK AND FINISH SCRUTINY REVIEW – SCOPE

1. Topic

Integrated Care across Northamptonshire (iCAN)

2. Responsible Overview and Scrutiny Committee

People Overview and Scrutiny Committee (OSC)

3. Purpose of the scrutiny review

To scrutinise the delivery of intended outcomes from the iCAN programme at key points during the period of the programme contract. iCAN is a joint health and social care transformation programme intended to produce benefits in terms of improved outcomes for residents, reduced operating costs and less reliance on acute hospital care through increased focus on community-based care, prevention and joint working within the care system.

4. Key lines of enquiry

- Can Overview and Scrutiny take confidence that the iCAN programme is delivering the outcomes that it is intended to achieve? iCAN is intended both to improve the experience that people have of health and social care in West Northamptonshire and also to deliver financial savings in the local health and social care system.
- How is the overall assessment of progress made by the iCAN programme reflected in the lived experience of service users and staff members?

5. Outcomes

To gain assurance about the outcomes being delivered by the iCAN programme and, if necessary, to make evidence-based recommendations to the West Northamptonshire Council Cabinet intended to assist in addressing any risks or areas of concern that may be identified.

6. Approach

Scrutiny will be carried out by a task and finish panel made up of the following councillors:

1. Councillor Emma Roberts (Chair)
2. Councillor Janice Duffy
3. Councillor Andre Gonzalez De Savage
4. Councillor Rosie Herring

5. Councillor Rosie Humphreys
6. Councillor Wendy Randall
7. Councillor Sue Sharps

The panel will meet with identified expert advisors periodically whilst the iCAN programme is in operation to get an overview of progress with the delivery of programme outcomes, any issues affecting planned delivery and how these are being mitigated.

Panel meetings will generally take place remotely, with the option of the final meeting being held in-person. Panel meetings may be held either during the day or in the evening to suit need.

7. Information required

Progress updates on iCAN programme delivery, supported by input from the following expert advisors:

- iCAN programme team representative(s)
- Executive Director of Adults, Communities and Wellbeing or specific service representative
- Newton Europe representative(s) – system transformation partner

Feedback from staff engagement activity carried out as part of iCAN programme implementation.

Information on service-users’ experience of the outcomes delivered by the iCAN programme, from the following sources:

- Feedback obtained from the iCAN People Advisory Group and/or from stakeholder groups supporting the co-production element of the iCAN programme led by the Deputy Chief Executive of Northamptonshire Healthcare NHS Foundation Trust as iCAN Deputy Senior Responsible Officer.
- Direct input from invited service users if suitable information is not available from other existing sources.

8. Resources and support

- Democratic Services officer support for panel meetings and for production of any report or recommendations that may result.

9. Timetable and key dates

The timing of panel meetings will be aligned to remaining iCAN contract gateway review points, which are as follows:

Stage Gate 3	March 2022
Stage Gate 4	June 2022

Stage Gate 5	September 2022
Stage Gate 6	December 2022
Contract Completion Gateway	March 2023

The People OSC may also wish to consider scheduling an agenda item on progress with the iCAN programme at one of its meetings at the mid-point of the contract, to enable public scrutiny of the 'mid-term' position informed by the panel's work.

10. Follow-up

The People OSC may consider the need for any further scrutiny activity on this topic following the completion of the panel's work as part of regular oversight of the People OSC's work programme.

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

14 November 2023

**Cabinet Member for Adult Care, Wellbeing and Health Integration-
Councillor Matt Golby**

Report Title	Commissioning of the National NHS Health Check Programme for West Northamptonshire.
Report Author	Dr Annapurna Sen, Consultant Health Protection and Health Care Public Health Annapurna.Sen@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	16.10.2023
Chief Finance Officer (S.151)	Martin Henry	13.10.2023
Other Director	Stuart Lackenby	26.10.2023
	Sally Burns	23.10.2023
Communications Lead/Head of Communications	Becky Hutson	30.10.2023

List of Appendices

None

1. Purpose of Report

- 1.1. The purpose of this report is to: inform Cabinet of the outcomes of West Northamptonshire NHS Health Check service evaluation, seek approval to adopt the recommended care pathway for the delivery of the NHS Health Check programme within West Northamptonshire, and agree commissioning of the recommended service provision.

2. Executive Summary

- 2.1 The NHS Health Check programme sets out to screen individuals aged 40-74 for signs of Cardiovascular Disease (CVD) to diagnose early and manage the condition, and to raise awareness around CVD and its complications to help prevent disease onset.
- 2.2 A service evaluation has been carried out on the NHS Health Check programme delivery in West Northamptonshire, to formally evaluate its service provision. The evaluation identified the need for the service delivery models to be appraised and to redesign the care pathway, finding a feasible model that addresses cost and clinical effectiveness as well as barriers in access to service provision.
- 2.3 Based on the recommendation, an option appraisal has been carried out by West Northamptonshire Public Health Team appraising three care models:
1. to continue with the existing pathway and do nothing.
 2. service provided solely by General Practices.
 3. an integrated model between General Practices and community providers with an outreach provision to address inequality.

Option 3 was found to be the most advantageous model, coordinating a seamless delivery of the NHS Health Check programme at a cost of £350,000 per year for five-year contract. The model provides enhanced clinical and cost effectiveness, in comparison to the other options appraised.

Members are requested to approve and adopt the recommended model and agree the commissioning of the integrated NHS Health Check care pathway for the West Northamptonshire population.

3. Recommendations

- To adopt and agree the recommended model of care for redesigning our service, improving access to NHS Health Checks for early detection of CVD diseases and preventing premature mortality due to CVD and its complications.
- Agree to initiate the commissioning process of the recommended service delivery model for the NHS Health Check programme in West Northamptonshire for its implementation for five-years (2+2+1).

4. Reason for Recommendations

- 4.1 The existing NHS Health Check programme does not meet national expectations. The CVD prevalence across West Northamptonshire has risen and continues to rise, and CVD related mortality in the area is higher than the national average.
- 4.2 The recommended model of service delivery will:

- provide capacity to deliver a tailored service aimed at improving CVD related health outcomes.
- focus on targeting inequalities in accessing the NHS Health Check service, supporting improvements to the quality of life in groups experiencing inequalities and inequity.
- improve service delivery by aligning community providers with General Practices and increasing resident's opportunities of receiving Health Checks and thereby uptake.
- better aligned service delivery with the prevention strategy, helping to reduce delays in treatment and increase referrals to community behavioural interventions that will reduce the risks of developing CVD diseases. This will result in a reduced demand on primary healthcare systems and have a reduction in the number of CVD complications, and CVD related admissions to the hospitals.
- offer providers an enhanced payment package, which supports process improvements and performance outcomes.
- provide an improved training package for providers that enhances the quality of Health Check delivery and incorporates Basic Life Support, Mental Health First Aid and Making Every Contact Count(MECC). Community providers will also be offered condensed IPC (Infection Prevention and Control) training.
- enable enhanced collaboration in primary care between General Practices, community providers and independent providers.
- provide a model that is financially and clinically effective at achieving health benefits of the NHS Health Check screening programme.
- provide a service that aligns to:
 - statutory requirement under the Local Authorities Regulation Act 13.
 - NHS Ambition Core 20PLUS5 to support in reducing healthcare inequalities by increasing hypertension case finding.
 - the 'All our Health' framework, ensuring the NHS Health Check programme reaches high-risk and vulnerable communities.
 - the objectives of the West Northamptonshire Local Area Partnerships (LAP) who aim to make a difference of those who live in the area through tailored and targeted support.
 - to the West Northamptonshire Health and Wellbeing Strategy ambitions three (opportunities to be fit, well and independent) and nine (access to health and social care).
 - the Integrated Care Network's Live your Best Life Strategy ambitions three (opportunities to be fit, well and independent) and nine (access to health and social care).
 - the three levels of the recommended preventative approach (primary, secondary, and tertiary).

5. Report Background

- 5.1 The NHS Health Check programme has been implemented in 2009 to screen for early signs of cardiovascular disease (CVD) to prevent poor health outcomes including stroke, heart, kidney disease and CVD related premature mortality.

The government is planning to roll out a digital offer which intends to deliver an additional one million Health Checks over the four years from 2024.

- 5.2 Following the disaggregation of Public Health Team into two separate teams of North and West Northamptonshire Councils and the end of the joint commissioning arrangements on 31st March 2024, West Northamptonshire Public Health recognised a need to recommission the service.

The NHS Health Check service had not been formally evaluated for 6 years. A contributory factor of this was due to the review date falling in the middle of the COVID-19 pandemic when the service delivery was suspended, and the workforce redeployed to the pandemic response.

- 5.3 A gap analysis on the financial spend of the programme, indicated that the service had been underspending. A decision had been taken to formally review the existing service provision and its care pathway to assess the strengths and gaps in the programme delivery. To facilitate the process of service evaluation a quick health status assessment on CVD was carried out.

The service evaluation identified the prevalence of CVD disease in Northamptonshire is higher than the England average, including Diabetes and Hypertension. It also demonstrated all age mortality for 75+ as well as mortality for Stroke and Dementia are higher than the national averages.

Data also showed low uptake of NHS Health Check programme in the working age population especially those from an IMD (Index of Multiple Deprivation) decile 2 and 3 and people from ethnic minority groups residing in West Northamptonshire.

The qualitative analysis of service user feedback highlighted a lack of local awareness and promotional marketing to fully inform the benefits of the service and its availability. The service provider feedback received from General Practices and community providers, stated the need for additional payment to meet the increasing cost of delivery.

This may be due to factors including: the base rate paid using payment by activity model, and a lack of incentivisation to meet the increasing cost of delivery.

The evaluation looked into the secondary evidence to better understand the implementation of the NHS Health Check digital offer. The review findings recommended ensuring the availability of an in-person Health Check service for those experiencing digital exclusion.

- 5.4 The options appraisal reviewed the following three options:

5.4.1 The existing model of delivery: that has two separate routes in which patients can enter the programme, either through General Practices or community providers. The continuation of delivery under the current care pathway will lead to a persistent underspend of the programme and will affect the performance. It is unlikely to meet the national target of 100% of the population invited to the programme. The authority will remain below the national benchmark for completed Health Checks. In addition, the increase in the number of individuals on a CVD register will continue to rise, and a delay in diagnosis and treatment of undetected cases will lead to complications and premature mortality causing additional burden on the Health care economy.

- 5.4.2 Patients solely access the programme through their General Practices: the benefit of this option is that the practices retain the eligible patient information, and information being stored on one data system, therefore reducing the risk of process failure.

However, evidence suggests that General Practices do not have the capacity to consume the entire NHS Health Check programme, as they are still dealing with the impact of the pandemic. General Practices may therefore find it challenging to meet the demands of the programme, resulting in performance failure.

- 5.4.3 The recommended option is a 'care delivery model with an integration between General Practices and community providers, coordinating a seamless delivery of the programme with an outreach arm that addresses inequalities.'

This pathway encourages General Practices to refer exceeding demand to community providers to deliver the Health Check. The benefit of this model is that General Practices who are unable to fulfil delivering the NHS Health Checks to their eligible patient population, can signpost patients to an aligned community provider. This is advantageous as the General Practices will not lose the patient and will be incentivised for referral and follow up to meet their administrative costs. The aligned community providers will have a strengthened working relationship with the General practices and will reduce burden of ineligible screening and prevent financial loss. The patient and the system will benefit from improved accessibility to a stable referral pathway, process delivery and completed Health Check.

- 5.4.4 The base rate of delivering NHS Health Checks for the preferred option is £22 per activity for all providers. There is an additional stratified payment arrangement to incentivise General Practices to meet the demand of incomplete Health Checks:

An additional payment of £2 per patient included for sign-posting patients who could not complete at the practice, to the community provider.

A further £2 per patient will be paid for a conversion (completed Health Check by the community provider and sent back to the General Practices).

There is a further £5 per patient to manage and follow a raised result, irrespective of the site completing the Health Check to cover the additional clinical cost incurred by the General Practices.

The total cost of delivery of the preferred option, including the IT(Information Technology) system contract worth £59,162 will be within the given reduced budget envelope of £350,000. The budget allocation will have a review when the NHS digital offer within the programme is implemented and fully functioning.

The allocated budget for NHS Health Check 2022-2023 may have some savings, this saving will be mobilised in preparation to streamline the recommended model.

6. Issues and Choices

- 6.1 The recommended model is detailed in section 5.4.3, as one of the most cost and clinically effective model of care in achieving health benefits of the NHS Health Check screening programme.

- 6.2 There is an option of adopting either of the other two proposed models. However, the analysis did not find them to be feasible, considering the current CVD health needs of the West Northamptonshire population and the system requirement of service provision.
- 6.3 The equality impact assessment identified that the recommended option meets the need of all layers of demography and is equitable to all by applying a proportionate universalism approach to improve the health of the entire population, whilst signposting most disadvantaged faster.
- 6.4 One of the tests of implementing this model of NHS Health Check, is to manage two separate commissioning models that include payment by activity and block contract to best fit the need of our population.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 Demand on primary care system is exceeding their current capacity, especially due to the impact of the COVID-19 pandemic and the healthcare system as a whole is still in the process of recovering from the effect of the pandemic and has not yet returned to pre pandemic activity levels.
- 7.1.2 The Health Checks programme is funded from the Public Health Ringfenced Grant and the existing budget is currently sufficient to cover the anticipated costs. There may be a need of additional funding in future years if the service outperforms and exceeds 70% of the local aspiration. The budget allocation will be reviewed once the NHS Digital offer within the programme is fully implemented and functioning.

7.2 Legal

- 7.2.1 The obligations and standards required for the National Health Check programme will be incorporated into the terms and conditions that will govern the delivery of these services through the contracts to be let. These terms will be drafted by West Northamptonshire Council's Legal Services and be included in the invitation to tender documentation.
- 7.2.2 Under the Local Authorities Regulations 2013 each local authority shall plan for the provision of NHS Health Checks being offered to eligible persons in its area.

7.3 Risks

- 7.3.1 **Low Risk:** Reluctance to behavioural change in our population towards reducing CVD risk and taking up the NHS Health Check offer.

Mitigation:

- Increase delivery of health education session to promote risk of CVD, benefits of NHS Health Check screening and lifestyle interventions to prevent CVD complications.
- Plan local communication campaigns to increase awareness about availability of NHS Health Checks and its benefits.

- Work with anchor institutes to promote the benefits of taking up the NHS Health Check offer. Example, work with local sports teams including Northamptonshire Saints, Northampton Town Football Club, and other influencers.

7.3.2 **Moderate Risk:** 100% of the eligible population accept the Health Check offer. The expenditure will exceed beyond the given budget envelope.

Mitigation:

- The suggested model addresses strategic priorities of other streams of preventative and protective health interventions which gives us the opportunity to collaborate and share funding for overlapping ambitions and priorities which would help to draw any deficit from their budget envelopes.
- Increased costs will reduce with the implementation of NHS digital Health Checks, giving benefit in our provider costs in the future. There will be minimal initial additional cost in promoting the digital offer, this is included within the given budget.
- Any additional cost of service delivery can be funded from the Public Health reserve, as the NHS Health Check programme is a statutory responsibility which West Northamptonshire Council is mandated to deliver.

7.3.3 **Moderate Risk:** Incompatible IT system between some of the community providers and General Practices creating dependencies for community providers on General Practices for engagement with the eligible population, which will delay the screening process and affect the uptake.

Mitigation:

- Commissioners to ensure that a structured contractual arrangement with the providers is in place through strengthening governance, safeguarding, external referral pathways and integration with wider healthcare system.
- Strengthening data and information agreement between community providers and General Practices.
- Clear service specification within the contractual arrangements with a requirement for General Practices to upload patient Health Check records received from community providers in a timely manner and ensure timely follow up of patients are completed.

7.3.4 **High Risk:** Conflict between primary care and community providers may lead to disjointed delivery of the service, leading to process failure and poor uptake and health outcomes.

Mitigation:

- Regular communications from the commissioners with all providers, supporting them with understanding, addressing issues, and creating collaborative interactions and communication between all providers and commissioners.

7.4 Consultation and Communications

- 7.4.1 This report has been produced for West Northamptonshire Council and submitted through the established governance arrangements.
- 7.4.2 There are clear national guidelines for the delivery of the clinical elements of the NHS Health Check programme. Consultation on the delivery model to ensure access for high-risk groups and communities will be a requirement of the new service specification and contracts.
- 7.4.3 The report has been consulted on with two ICB Deputy Chief Medical Officers and General practices and is due to be taken to the Local Medical Council and Local Pharmaceutical Council for consultation.

7.5 Consideration by Overview and Scrutiny

- 7.5.1 None

7.6 Climate Impact

- 7.6.1 During the preparation for new arrangements from 2024, climate impact has been given consideration in the option appraisal and the suggested models of service delivery.

7.7 Community Impact

- 7.7.1 The report considers the health and wellbeing of West Northamptonshire resident population. Improving accessibility and delivery of the NHS Health Check service will improve CVD outcomes and a positive impact on the wellbeing of the eligible residents.

8. Background Papers

- 8.1 Background papers on service evaluation, options appraisal can be requested for further details.



WEST NORTHAMPTONSHIRE COUNCIL

CABINET

Tuesday 14 November 2023

Cabinet Member for Housing, Culture and Leisure - Councillor Adam Brown

Report Title	West Northamptonshire Housing Allocation Scheme
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List of Appendices

Appendix A: West Northants Housing Allocation Scheme

Appendix B: How the Housing Allocation Scheme was developed

1. Purpose of Report

- 1.1. To seek Cabinet approval of the final West Northamptonshire Housing Allocation Scheme to provide a framework for the allocation of social rented homes across West Northamptonshire from April 2024.

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 applicants and the basis on which a Local Authority will allocate accommodation.
- 2.2 Under the Local Government (Structural Changes) Transitional Arrangements) (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation) West Northamptonshire Council (WNC) was given an exemption of the requirement to have a single allocation scheme and that exemption will expire on 31st March 2024 and WNC therefore must have a new Council Housing Allocations Scheme in place by 1 April 2024.
- 2.3 The 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 West Northamptonshire's most vulnerable residents whilst ensuring that the area's valuable housing resources go to those in most in need.
- 2.4 This report sets out the final draft West Northants Housing Allocation Scheme following the conclusion of a 10-week consultation with service users and stakeholders. It provides a summary of the feedback received from the consultation and explains how this this has influenced the final draft Scheme.
- 2.5 The proposed Scheme will be through a choice-based lettings operating system, which enables residents to make choices about which properties they are interested in.

3. Recommendations

- 3.1 It is recommended that Cabinet:
- a) Approves the final West Northants Housing Allocation Scheme for West Northamptonshire contained in Appendix A to this report
 - b) Approve delegated authority to Portfolio Holder for any minor amendments to the Scheme prior to operational commencement on the 1 April 2024

4. Reason for Recommendations

- 4.1 To accord with legislation and which requires a harmonised Housing Allocations Scheme to be published by 1 April 2024.

- 4.2 Aligning three existing housing allocation schemes into one Scheme, which will create equality of opportunity to access social rented housing across West Northamptonshire.

5. Report Background

- 5.1 West Northamptonshire Council is required to produce a new Housing Allocation Scheme. 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.
- 5.2 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.
- 5.3 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.
- 5.4 The new 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 final draft 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 Details of the housing allocations scheme proposed for approval

5.10 The final 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 The draft final Scheme at Appendix A contains full details of these rules.

5.12 Eligibility and Qualification

5.13 To join the West Northants Housing Allocation Scheme, an applicant will need to be both eligible and qualify.

5.14 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.

5.15 The Scheme has set out that 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.

5.16 It is proposed that the following circumstances of applicants will **not** qualify for the Housing Allocation Scheme:

- Persons under 18 years of age
- Persons incapable of holding a tenancy
- Persons that do not meet the West Northants local connection criteria
- Persons found guilty of unacceptable or unreasonable behaviour
- Persons who have housing related debt
- Persons who have breached tenancy conditions
- Persons who are homeowners in the UK or abroad
- Persons who have an income and savings above the financial resource limit
- Persons who do not have a recognised housing need

5.17 Changes to qualification criteria following formal consultation

5.18 The consultation on the draft Scheme has not resulted in changes to the qualification criteria. Although some further detail and points of clarity have been added to the criteria. These updates relate to:

- Local Connection criteria – the connection for employment and family as criteria for qualifying has been defined much more tightly.
- Housing related debt – the Scheme now sets out an approach depending on the level of debt and the decisions that will be made. This will be clearer for Applicants but will also be easier for assessing officers to apply the criteria. The emphasis on housing related debt is the evidence that the applicant is maintaining regular / consecutive affordable payments to reduce the debt.
- No housing need – More clarity added and sets out that if none of the circumstances as defined in the priority bands are relevant to the applicant then they will be regarded as having no housing need.

5.19 **Prioritisation**

5.20 The Council is required by law to determine the relative priority that housing Applicants are awarded.

5.21 The proposed banding criteria reflects the statutory reasonable preference categories and additional preference. Four priority bands A-D are proposed which contain a list of criteria that satisfies each priority band.

5.22 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.

5.23 Band A

5.24 This band relates to housing need that is exceptional and an immediate need to move. This will include households that are owed the main statutory homelessness duty and those who are accommodated in interim temporary accommodation. This band is also for applicant's who are suffering sudden or severe progressive life-threatening medical conditions or disability because their current home is unsuitable and poses an immediate and serious danger to the individual, and those with exceptional welfare and social hardship. Care leavers who have had a duty of care accepted under the Children's Act are also prioritised within this band.

5.25 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.

5.26 Changes to Band A priority following formal consultation

- **Homeless households** - Households that are owed a main statutory homeless duty and those in interim temporary accommodation, were originally in Band B, but are now within Band A. There was a concern that the consultation draft Scheme placed all of the homelessness duties into Band B. This could have restricted our ability to move households on from temporary accommodation and would have impacted on our ability to re-house those in greatest housing need. In addition applicants, with a prevention duty and not in temporary accommodation would have had the same level of priority of an applicant in temporary accommodation.
- **Care leavers** were originally in Band B, but are now within Band A
- **Private sector properties with Cat 1 hazards** – properties with Cat 1 hazards were originally in Band B, alongside properties that were lacking basic facilities. Cat 1 hazards are now in Band A, and the category for lacking basic facilities remaining in Band B
- **Armed Forces** – were originally in Band B, but are now within Band A
- **Supported move-on** – originally in Band B within medical category, however to ensure timely move-on from short-term supported housing and hostels it was considered that move-on required a category of its own, and a higher priority.

5.27 Band B

Band B priority includes applicants that are owed a homeless prevention or relief duty. This priority also includes applicants who are severely overcrowded by 2 or more bedrooms, and those with severe medical or disability needs.

5.28 Changes to Band B priority following formal consultation

- **Private sector properties** with Cat 1 hazards were moved into Band A.
- **Older people approved for sheltered accommodation** – a new category has been included within Band B to reflect those applicants who have been assessed as requiring from sheltered / supported or other specialist older people’s accommodation
- **Applicant with at least one dependent child sharing with others** – this category has been moved to Band C within the new category ‘Insecurity that risks homelessness’

5.29 Band C

Band C priority includes applicants with lower-level housing needs. This includes applicants that are threatened with homelessness and have insecure living arrangements, those with medium medical / disability and right to move applicants.

5.30 Changes to Band C priority following formal consultation

- **Insecurity that risks homelessness** - this a new category which encompasses those that are threatened with homelessness and have insecure living arrangements that are not sustainable in the longer term. The aims to is give sufficient priority on the Scheme to ensure that they stay in the family home and wait for an offer of social rented housing rather than become homeless.

5.31 Band D

This band includes two specific groups of applicants with no housing need, but are permitted to qualify for the scheme, namely those with a local connection to a rural exception site or section 106, where allocation requirements are contained within legal planning agreements and those seeking sheltered accommodation. including households who have been deemed to have deliberately worsened their circumstances.

5.32 Changes to Band D priority following formal consultation

- **Seeking older person's accommodation** – this additional category of need has been included, although the household have no housing need, but are eligible to be considered for older persons accommodation.

5.33 Other matters

5.34 Offers of suitable accommodation

5.35 It is proposed that most Applicants will be entitled to two reasonable offers of accommodation. However, the following exceptions are proposed:

- a) Applicants owed a statutory homeless duties (Band A) will be made one suitable offer of accommodation determined by a system generated 'autobid' function;
- b) Applicants in Band B with a homelessness duty will be entitled on **one** offer of accommodation via the Scheme's bidding system.
- c) Applicants who are subject to MAPPAs will be made one reasonable offer to accommodation, this will be through a direct matching.
- d) Most Applicant in Band A (bar the exceptions above) will be allowed two suitable offers of accommodation and will be allowed to bid, however a direct offer may be made at any time due to the immediacy of their need to be rehoused.

- 5.36 This will enable emergency 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.
- 5.37 Changes to offers following formal consultation
- 5.38 Number of offers to statutory homeless – the consultation draft Scheme was suggesting that all applicants would receive 2 reasonable offers of accommodation. Consultation feedback identified the impact on managing households in temporary accommodation would be considerable, and that households would remain in temporary accommodation longer than they would if the Scheme was amended to 1 offer policy approach.
- 5.39 The final draft Scheme has proposed that Applicant owed a statutory homelessness duty will be made one suitable offer (via autobid) and a refusal will mean that their banding priority for being owed a statutory homeless duty will be removed.
- 5.40 However the Scheme has included some additional safeguards for Applicants owed a statutory homeless duty who refuse an offer of accommodation. It is proposed that the application is reviewed following the refusal of one offer and if the offer was reasonable, the Council would deem that its legal duty had been discharged, and the Applicant would be placed in a lower appropriate Band that reflects their housing need.
- 5.41 Direct offers
- 5.42 The consultation draft Scheme included provision for when the Council may choose to make a direct offer outside of the choice based lettings scheme. There may be circumstances where for operational or financial reasons there is a need to make a direct offer. The section on direct offers has been amended to ensure that it allows us to make direct offers outside of the CBL system.
- 5.43 Medical / Disability needs
- 5.44 The Scheme is still proposing to offer three priority bands based on medical / disability housing needs:
Band A: Emergency medical or disability – Applicants who are suffering sudden or severe progressive life-threatening medical condition and an immediate need to move because their current home is unsuitable and poses an immediate and serious danger to the individual.

Band B: Severe medical / disability need – Applicant living in accommodation with a severe long term medical condition or severe disability that means they urgently need to move because their home is assessed as being highly unsuitable.

Band C: High medical /disability – Applicants who need to move on medical grounds because their medical condition or disability is adversely affected by their current accommodation.

The Scheme provides additional guidance and provides example of circumstances for each of the medical/disability priorities. This will help Applicants when applying, but it is also intended to guide the assessing officers to determine the different thresholds set for each Band award.

5.45 **Wider strategic priorities**

5.46 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 A), and those applicants who are victims of domestic abuse, racial abuse and hate crimes (Band A and B).

5.47 **Choice based lettings**

5.48 The final 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.

5.49 The final 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.

5.50 **Impacts of the new draft Scheme**

5.51 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.

- 5.52 There are currently over 4000 applicants registered to and active on the existing three housing allocations scheme across West Northamptonshire. The draft proposed scheme has the potential to have a positive impact on existing and future applicants prospects of securing accommodation as applicants will have access to a greater number of properties across West Northamptonshire under the new scheme.
- 5.53 The most noticeable changes will be experienced by applicants on the housing register in the South Northants area. The legacy scheme operates a direct lettings scheme, whereas the proposed new scheme will be on a choice-based lettings basis.
- 5.54 All existing applicants will also experience more disruption in relation to the reapplication process associated with the proposed new scheme and IT system. However, this is not an unusual requirement with the delivery of a new allocation scheme and bespoke IT system and also acts to replace the annual renewal process whereby applicants are required to check and confirm the details on their application. It will be important that we ensure the sufficient opportunities for accessing help and support with the reapplication process are available and communicated to applicants.
- 5.55 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:

Table 1: Summary of qualification criteria changes

Aspects of scheme	Existing Allocation Schemes			New scheme
	Daventry area	Northampton area	South Northants area	Final draft WNC Scheme
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	Debt under £100 will be disregarded. Debt over £1000 and at least consecutive payments and have repaid at least 25% of their original debt will

				<p>be permitted to join the register and bid for properties</p> <p>Debt over £1000 and no arrangements to repay will not qualify to join the Scheme</p> <p>Debt of £500-£999 will qualify to join the Scheme but unable to bid unless evidence of consecutive payments</p> <p>Debt under £500 will qualify to join and bid on the Scheme, but will need to demonstrate consecutive payments.</p>
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 exemptions 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	Capped at £16k	Capped at £16k

		applicant and £32k for joint		
No housing need	Band D	Do not qualify	Do not qualify – exemption for rural schemes	Do not qualify – exemption for rural schemes and older persons accommodation

- 5.56 The local connection qualification has changed, it is now proposed that the local connection for residency, employment and close family connection is a minimum of two years continuous connection to the West Northants area. This is more likely to negatively impact those applicants registered on Daventry and South Northants legacy scheme as the current legacy local connection is lower (12 months or less).
- 5.57 The qualification criteria for housing related debt now sets out an approach depending on the level of debt and the repayment arrangements in place. This will be clearer for Applicants but will also be easier for assessing officers to apply the criteria. The emphasis on housing related debt is the evidence that the applicant is maintaining regular / consecutive affordable payments to reduce the debt.
- 5.58 A potential impact of applicants on the Daventry legacy scheme is those with no housing need seeking general needs housing. Under the new scheme, applicants will not qualify if they do not have a housing need, unless they meet one of the exemptions (local connection for a rural exception site / seeking older persons accommodation). In practice, this is likely to have a limited impact, as the demand on the current legacy scheme is approximately 135 applicants.
- 5.59 The proposed prioritisation banding system (A-D) is much simpler than some of the existing schemes, without the inclusion of points or stars etc.
- 5.60 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.
- 5.61 The new proposed Scheme is much clearer on how medical needs will be considered and prioritised with the Scheme, and the information that will need to be provided by recognised medical professionals.

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 It is recommended that the final draft West Northants Housing Allocation Scheme is approved and adopted for publication.
- 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

7.1.1 The draft Housing Allocation Scheme proposed does have costs associated with the accompanying ICT system. Following an options appraisal on the two incumbent ICT solution providers, it was recommended that Capita Open Housing is chosen as the preferred provider to develop the ICT solution based on timescales, costs and complexities. The costs associated with this are within the service budget envelope.

7.2 Legal

7.2 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.

7.2.1 Under the Local Government (Structural Changes) Transitional Arrangements (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation) West Northamptonshire Council the exemption from the requirement set out in 7.2 above expires and therefore a new Council Housing Allocations Scheme must be in place by 1 April 2024.

7.2.2 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.

7.2.3 The consultation carried out has satisfied this requirement.

7.2.4 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.

7.2.5 The Scheme has been developed to be compatible with other relevant legislation, regulations and guidance.

7.3 Risk

7.3.1 There is a legal requirement to have in place an allocations scheme for determining priorities and the procedure to be followed in allocating social rented housing.

7.3.2 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.

7.3.3 The impact of non-compliance to the structural change order could result in reputational damage, risk of challenge and potential consequences from central government. Furthermore, interruption to the Housing Allocation service would not be acceptable as this is a front line service, with many customers in a priority groups who may be at risk and vulnerable.

7.4 Consultation and Communications

7.4.1 Prior to the formal consultation period, the scheme was developed jointly through validation workshop and involved elected members, officers, NPH, local partners and stakeholders.

7.4.2 A ten-week consultation in respect of the draft West Northamptonshire Housing Allocation Scheme was launched on the 19 July and closed on 26 September 2023. An online survey was made available on the Council website. Consultation survey responses were received online, telephone and email.

7.4.3 The consultation was promoted via press releases, website articles, staff /member briefings. All existing applicants of the three legacy schemes were contacted directly via email to notify them of the consultation opportunity and the relevance of the proposed changes to the allocation of social rented housing across West Northamptonshire in the future.

7.4.4 The consultation presented key proposals and invited respondent to say whether or not they strongly agreed, agreed, neither agreed nor disagreed, disagree, strongly disagree and unsure

with the draft proposals. It also provided sufficient scope for respondents to provide free text feedback on each proposal and on the wider draft scheme.

7.4.5 The key proposal areas on which feedback was specifically sought were:

- The proposed qualifying criteria to join the Scheme
- The proposed other matters around offers of accommodation and deliberately worsening circumstances
- The proposed priority banding criteria.

7.5.6 The consultation received a total of 732 responses analysed, consisting of 445 fully completed responses. 624 (85%) of respondents were from local residents of West Northamptonshire and 363 (57%) of respondents were already registered with a current housing allocation scheme within West Northants.

7.5.7 There was positive support for the draft housing allocation scheme as 69% of respondents strongly agreed and/or agreed with the proposals within the consultation. 15% neither agreed nor disagreed, whilst only 12% disagreed and/or strongly disagreed with the proposals.

7.5.8 Appendix B – ‘How the Housing Allocation Scheme was developed’ shows the breakdown of respondents by demographic factors and illustrates a representative sample and a large proportion of existing service users engaged in the consultation. Table 2 of this document identifies the key comments / responses and how these have influenced the final draft scheme.

7.6 Consideration by Overview and Scrutiny

7.6.1 A presentation to Children’s, Education and Housing Overview and Scrutiny took place on the 19th June 2023, with recommendation presented to Cabinet in July 2023.

7.7 Climate Impact

None

7.8 Community Impact

7.8.1 An Equality Screening Assessment in respect of the final Housing Allocations Scheme has been completed, and reflects the changes made to Scheme following consultation. Their assessment concludes that there are no negative impacts.

8 Background Papers

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**West
Northamptonshire
Council**

West Northamptonshire Council Housing Allocation Scheme

November 2023



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DRAFT

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. 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.

1.1.4. 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.

1.2.2. 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. Transfer Applicants (like all 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 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 Local Authority and Registered Provider social rented homes.

2.1.3. The Scheme will be subject to periodic review, in accordance with legal or statutory guidance.

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 9.11.1. 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 who needs support to apply to join the housing allocation scheme or exercise their right of choice to the housing they might be offered, will be able to access support. Any person will be entitled to request information about the allocation of social rented housing in the West Northants local authority area.

3.1.6. 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 center 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. The Local Authority will make reasonable adjustments for those applicants with protected characteristics, when making an application, when expressing choice and when determining whether or not to accept or reject an offer. The impact of the Scheme on applicants with protective characteristics will be monitored.

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. Information about an application will not be shared with any third party without expressed consent from the applicant. 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 F.

4.0. Eligibility

- 4.1.1. To join the West Northants Housing Allocation 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). The legislation and accompanying regulations regarding eligibility for housing are complex and subject to regular change. Please see appendix D for further details.

4.2. Habitual residence

- 4.2.1. 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.
- 4.2.2. 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).
- 4.2.3. 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.

4.3. Applicants who are not eligible

4.3.1. 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.

4.3.2. 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

4.3.3. 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.

5.0. Qualification

5.1.1. In addition to eligibility criteria, Applicants are subject to the West Northants qualification criteria. Applicants will need to demonstrate that they satisfy the qualification criteria at both the date when they applied to join the scheme and again at any future date when they might be offered accommodation.

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 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 will need to satisfy any of the following factors (Applicants that are exempt from satisfying local connection criteria are listed below at section 5.3.3).

- A. **Residence** – Lived in the Local Authority’s area continuously for the last 2 years prior to housing application and that residence was of their choice. If the Applicant is registered on the housing register, they must continue to live in the Local Authority’s area to remain on the housing register. 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).

- B. **Employment** – The applicant or their partner are employed in permanent employment in the Local Authority’s area and to travel to work by public transport would take them in excess of 90 minutes each way and they do not have their own transport.

Employment is defined as paid employment for at least 16 hours or more per week for a continual period of at least 6 months and is not work that is considered to be temporary, casual or seasonal. Where there is a zero hour contract the assessment will consider if, on average over a 3 month period, the person is working for 16 hours a week or more and that zero hours contract is not a temporary contract. The applicant or household member must be working at the point of any offer of a tenancy is made.

Where Applicants who are self-employed they must demonstrate that:

- Their self-employed work they perform is:
- In the Local Authority’s area, and
- Cannot be performed from home, and
- They have been self-employed for a continual period of at least 6 months, and
- Their self-employment work is not work that is considered to be temporary or seasonal

In addition, the Applicants must be working as self-employed at the point an offer of an tenancy is made.

NOTE: Employment must be their actual place of work in area and not employment based on a head office or regional office situated in the area but from which the applicant does not work. For applicants employed by a national company their actual place of work must be within the area.

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.

- a) Verification of employment, or an offer of employment, and acceptance of it from the employer, such as:
 - i. A contract of employment.
 - ii. Wages and or 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. Close Family connections – The Applicants have close family (normally considered to be a spouse or partner, mother, father or other legal guardians, brother, sister or adult son or daughter) that have lived in the district for a minimum of the last 2 years and the Applicants need to be in the Local Authority's area to give or receive essential support from close family.

NOTE: It is for the Local Authority to decide on whether an Applicant meets this local connection qualification for close family.

D. 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. Local Connection exceptions

5.5.3. The local connection criteria will not apply to the following applicants:

- a) An Applicant who are homeless (within the meaning of Housing Act 1996 Part 7) or owed a homelessness duty under S190 (2) S193 (2) S195 (2) of Housing Act 1996 Part 7.
- b) A Transfer Applicant who is entitled to a reasonable preference, due to needing to move to a particular locality in the district, with failure to meet that need would cause hardship, because they work in the district, or have been offered work in the district and they intend to take this work up.
- c) A Transfer Applicant who is under-occupying their home and wishes to downsize to a smaller home. An Applicant who is a victim 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.
- d) An Applicant who needs to move away from another area to escape violence or harm.
 - e) An Applicant who needs support to rehabilitate and integrate back into the community.
 - f) An Applicant who has is a refugee that has been granted leave to remain less than two years prior to the date of their application and was residing in the Local Authority area at the date they received their leave to remain.
 - g) An Applicant who is a gypsy or traveller.
 - h) Right to Move 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):
 - i. The distance and/or time taken to travel between work and home.
 - ii. the availability and affordability of transport, taking into account the level of earnings.
 - iii. The nature of the work and whether similar opportunities are available closer to home.
 - iv. Other personal factors, such as medical conditions and childcare, which would be affected if a move could not take place.
 - v. The length of the work contract.
 - vi. 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.
 - vii. 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.
 - i) 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 Local Authority area.
 - j) An Applicant who are members of the Armed Forces community:
 - i. An Applicant who are currently serving in the Regular Armed Forces.
 - ii. Or were serving in the Regular Armed Forces at any time in the five preceding years of their application, and their spouses.
 - iii. 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.
 - iv. 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.

- v. 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.
- vi. 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.

5.3.4. 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. A serious offence is defined as per Housing Act 1985, Schedule 2A.

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 any member of their current or prospective household.

5.4.4. This will apply where an Applicant, or any member of their current or prospective household, has demonstrated serious unacceptable behaviour that, in the view of the Local Authority, makes them at the time of their application, or since their application, unsuitable to be a tenant.

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 (as defined in the Housing Act 1985 Sch 2A), 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.

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. 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. How decisions for Applicants with a housing related debt will be made

a) Applicants with debts of £1,000 or more who have not made any arrangement to address the debt

Applicants with debts of £1000 or more who have not made an arrangement acceptable to the Local Authority to address the debt. They will fail to qualify to join the housing register unless the circumstances surrounding the debt are exceptional and an assessment concludes that there is no real risk of future non-payment.

b) Applicants with debts of £1,000 or more who have already made an arrangement to address the debt at the point of their application

Applicants will be permitted to join the register and be able to bid for accommodation if they have maintained a payment arrangement for at least 13 weeks and have repaid at least 25% of their original debt.

Applicants who satisfy the above will be permitted to bid for properties. All partner housing association landlords are encouraged to abide by these guidelines and to accept bids on this basis. However, a housing association to whom the debt is owed, may wish to see that a longer period of repayment has been kept to. Any requirement by the partner to whom the debt is owed for payments to be maintained for a longer period should not prevent an applicant from bidding for properties advertised by another housing association partner.

c) Applicants with debts of £500-£999

Applicants with debts of £500-£999 will be eligible to join the register but ineligible to bid, unless the applicant can demonstrate to the Local Authority that there is a low risk of non-payment for a new tenancy. They will still be allocated a band and will accrue their time in band whilst they take action to resolve the debt as per the rules in the policy.

Evidence of a low risk of non-payment for a new tenancy could include:

- a) A history of not having housing debts.
- b) A history of regular rent payments.
- c) A history of payment arrangements having been maintained.

Where no such evidence exists, an applicant will be unable to bid until there is evidence that:

- a) They have maintained a repayment arrangement for 8 weeks.
- b) Reduced the debt to below £500.
- c) Demonstrated that they have addressed the issues that caused the debt.

d) Applicants with debts of £101-£499

Applicants with debts of £101-£499 will be eligible to join the register and eligible to bid, unless there is clear evidence of a future risk of non-payment. Arrears of £100 or under will not be considered.

Evidence of a future risk could include factors such as:

- a) A long history of housing debt.
- b) A long history of poor rent payments.
- c) A long history of breached payment arrangements.

Where such evidence does exist, the applicant will be unable to bid until there is evidence of:

- a) Maintaining a payment arrangement for 8 weeks.
- b) Demonstrating that the causes of the previous problems have been addressed.

Applicants who are disqualified for a housing related debt should notify the Local Authority immediately when they have either repaid at least 25% of their original debt so their circumstances can be reassessed. If it is agreed they can then join the housing register their effective registration date will be the date they have been assessed as qualifying for the register and will not be the date of their earlier application which resulted in the decision that they did not meet the qualification rule.

The only exception to the rent arrears or housing related debt rule is where an applicant can demonstrate that their circumstances are exceptional, and they would therefore face serious hardship or risk through not being allowed to qualify.

An exception may be considered where for example, an applicant has a good payment history but has incurred a debt as a result of a 'one off' problem, or where a tenant had to flee domestic abuse and a subsequent debt has built up for the tenancy left.

5.6.1. Breaches of tenancies

5.6.2. 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) Wilfully 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 for the purpose of being allocated social rented housing, will be treated as still possessing the value of their home given away, (provided that an applicant knew the existence of homeownership being a disqualification criteria) will be disqualified from joining the Scheme. Except when an applicant who has or had a legally enforceable debt that is or was immediately repayable, or to make payments due to the threat of having to make high interest payments, will not be treated as still possessing the value of their home given away.
- 5.7.4. If an Applicant has transferred the ownership of their homes to family members, 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.
- 5.7.5. The following exceptions will apply:
- a) Property has been valued as having negative equity within three months of the date of application and date of any offer of accommodation that might subsequently 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.
 - 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 or a Fire Authority issued a Prohibition Order 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 and or 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 and or 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 and or 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 has no assessed housing needs will not qualify on this Scheme. An applicant will be regarded as having no housing need / being adequately housing if none of the circumstances as defined in the priority bands are relevant to them or a member of their household, both at the date of application and again at the date of

any subsequent offer of accommodation that might be made. Any person can access advice and assistance on other housing options from the Local Authority's Housing Solutions Team.

5.9.3. The following exceptions will apply:

5.9.4. Where an Applicant has no housing need but establishes a local connection within a local lettings policy (see section 9.11.1) 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 Local Authority 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, who have direct knowledge of the Applicants or a member of their households health and the impact on their housing needs.

7.3.2. A relevant health medical professional is defined as:

- Occupational Therapist
- Specialist medical advisor
- Community / mental health nurse
- Hospital / discharge liaison
- Social Worker
- GP
- Health visitor

7.3.3. Applicants who have applied for an allocation of social rented housing due to medical /disability needs, pertaining to themselves and / or a member of their household, will qualify to join the Scheme if there is evidence (at the date of the application and again at the date of any accommodation that might be offered) that:

- i. Their medical / disability needs cannot be met in their current accommodation.
- ii. Their needs are being made worse or will be made worse by remaining in their current accommodation.
- iii. Their current property cannot be improved and / or adapted to meet their needs, wither at all or at a reasonable cost / time.
- iv. Rehousing is likely to significantly improve their needs.

7.3.4. Medical priority will **not** be normally be awarded in the following circumstances:

- i. Where the applicant has a health issue, however severe, that is not impacted by the accommodation occupied.
- ii. Health problems that are not affected by your housing or cannot be improved by moving.
- iii. Where a move would only make a marginal improvement to the applicant's condition.

- iv. Medical impact caused by housing defects that are likely to be rectified in a reasonable time frame, by action taking by the Applicant or by the landlord.
- v. Where another reasonable course of action is available to the applicant to resolve their difficulties
- vi. Time-related medical problems (e.g., pregnancy-related problems or a broken leg).
- vii. Disrepair problems not impacting significantly on the applicant's medical condition (note under the Scheme an applicant may receive priority separately for living in unfit or unsatisfactory housing depending on the assessment made of their circumstances and impact).
- viii. Overcrowding not impacting significantly on the applicant's medical condition. (NOTE: Under the policy an applicant may receive priority separately for being overcrowded).
- ix. If the situation can be resolved by equipment or minor adaptations which can be implemented in a reasonable period of time.
- x. You are homeless and the temporary accommodation provided by the Local Authority is affecting your medical needs. This is because the Local Authority would review the suitability of the accommodation if it is impacting on your health and welfare.
- xi. The medical issue relates to someone who is not part of your household.

7.4.1. Medical priority

7.4.2 Medical priority can be awarded under three of the priority bands. These are:

7.4.3. Band A: Emergency Medical or Disability

7.4.4. Band A award is for Applicants who are **suffering sudden or severe progressive life-threatening** medical conditions and need an immediate move because their current home is unsuitable (as it does not meet their medical needs and/or cannot be adapted) and **poses an immediate and serious danger** to the individual.

7.4.5. The following provides some examples on the threshold set for a Band A award:

- i. Applicants who have a progressive, chronic or life-threatening medical condition and cannot be discharged from hospital because they do not have any accommodation, or their accommodation is unsuitable for example, because they cannot access toilet and/or bathing facilities in the property. This will include cases that cannot be discharged from hospital because their home is, and will remain, permanently entirely unsuitable or entirely inaccessible to live in.

- ii. Where the assessing officer accepts that the evidence from a relevant health professional indicates that there is a significant risk of serious and permanent injury and/or permanent disability.
- iii. Applicants who have a progressive, chronic or life-threatening medical condition and urgently need to move to accommodation with significant disabled adaptations, such as accommodation suitable for a wheelchair user.
- iv. A serious illness, where an applicant is receiving palliative care and urgently requires rehousing to facilitate the on-going provision of that care.
- v. The applicant's health is so severely affected by the accommodation that it is likely to become life threatening, e.g., applicant has severe mental health problems that are significantly exacerbated by their accommodation and that opinion is fully evidenced by the applicant's consultant or mental health services.
- vi. Due to limited mobility a person is unable to access essential parts of the property e.g., bathroom/toilet and no adaptation is possible.
- vii. A member of the household is elderly or disabled or has a progressive illness and is likely to require admission to hospital or residential / nursing care in the immediate future and re-housing would enable the person to remain at home.
- viii. Where the applicant is prevented from having access to kidney dialysis, respiratory, or other similar essential equipment. This will normally apply where these circumstances are likely to prevent someone from remaining in their home for all or most of the time. Such a condition would be likely to be ongoing, rather than a temporary condition.

7.4.6. Band B: Severe medical or disability

7.4.7. Band B award is for Applicants who are suffering severe, long term, medical conditions (chronic or progressive) or severe disability that need to move urgently because their home is deemed unsuitable and is directly detrimental to the Applicants' health condition.

7.4.8. The following provides some examples on the threshold set for a Band B award.

- I. A life-threatening condition which is seriously affected by the current housing and where re-housing would make that condition significantly easier to manage.
- II. A life limiting condition and their current accommodation is affecting their ability to retain independence or enable adequate care.
- III. A new and life-changing condition that severely impairs their mobility, meaning they are unable to carry out day-to-day activities, or have difficulty accessing facilities inside and outside of their accommodation and require housing into suitable accommodation.

- IV. An applicant or member of his / her household usually has a chronic condition, examples might include a respiratory condition, severe asthma, or emphysema – and that the condition is being made worse by the current accommodation.
- V. Where their current property leaves a person at risk of infection, e.g., where an applicant is suffering from late-stage or advanced AIDs.
- VI. People who have a severe mental health or learning disability which significantly affects their ability to lead a normal life, and which puts them at risk of admission to hospital or residential care. Evidence would normally need to be provided from a specialist consultant psychiatrist or a certified pediatric nurse that their current accommodation is having a significant detrimental impact on the mental health of any member of the household.
- VII. People living in a mobile home, caravan or converted vehicle which, due to medical conditions, the vehicle cannot meet their essential needs.
- VIII. Where remaining in the current accommodation poses a significant risk of serious and permanent injury and/or permanent severe disability.
- IX. Someone with a medical or disability who's housing has rendered them housebound.
- X. Where a move would avoid the need for another service (e.g., Social Services) from having to provide a significant level of support. This might include for example residential care, overnight care provision, or other support with similar resource implications.
- XI. Where someone suffers with epilepsy or other conditions that cause frequent and unpredictable falls and all medical interventions to prevent them have been investigated. This will involve an assessment of the layout of their current accommodation, for example the number and nature of steps, stairs or other hazards that may increase the risk of serious injury.
- XII. The applicant or household member requires significant disabled adaptations to meet their needs and this is not possible in their current accommodation or would not be cost effective.
- XIII. Armed forces personnel who need to move to suitable adapted accommodation because of a serious injury, medical condition or disability that he or she has sustained as a result of service.
- XIV. Veterans who have actively served in the armed forces and are suffering from severe post-traumatic stress disorder or serious illness directly related to service in the forces.
- XV. An occupational therapist has identified that the current accommodation is partially suitable but:
- XVI. The applicant or member of his / her household needs a major adaptation, such as a level access shower; or
- XVII. The applicant or member of his / her household has significant difficulty managing stairs or difficulty accessing the property owing to stairs or slopes leading to

- doorways and the occupational therapist recommends a lift, ramped access or ground floor living; and
- XVIII. The adaptations are unlikely to be completed in a reasonable period of time.
 - XIX. Applicants who have significant mobility issues and would benefit from a move to ground floor or level access accommodation.
 - XX. Applicants who have significant mobility issues and would benefit from a move to accommodation that has level access showering facilities.
 - XXI. Children with severe conditions such as autism, or cerebral palsy or ADHD where their long-term needs cannot be met without long term settled accommodation.
 - XXII. A person with a severe disability requiring some adaptations to their property that cannot be provided for in their current accommodation.
 - XXIII. Where an applicant can access their home but struggles to access normal day-to-day facilities within it (e.g., bath / shower / toilet) without experiencing significant difficulty, pain or other discomfort. This would include cases where an adaptation is possible but cannot be undertaken in a reasonable period of time. (Note: any priority would be removed if an adaptation is completed, or work started).

7.4.9. Band C – High medical or disability

7.4.10. A Band C award is for applicants who need to move on medical grounds because their medical condition or disability is adversely affected by their current accommodation.

7.4.11. The following provides some examples on the threshold set for a Band C award.

- i. Has a learning disability and needs to move into mainstream accommodation.
- ii. 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.
- iii. Is living in a property which is having a detrimental impact on their health and or welfare and there are no remedies available to improve the conditions:
 - Need improved heating on medical or social care grounds.
 - Living in a building with poor sound-proofing and day to day living noises from their neighbours is impacting on their wellbeing.
- iv. 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.

- 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.
- vi. An applicant suffering from harassment or neighbour nuisance, such as verbal abuse or damage to the property. The problems will have been reported to the landlord and/or the Police for action, but a satisfactory conclusion not found. The harassment is not at a level whereby the applicant has an urgent need to move.

7.4.12. When medical priority will not normally be awarded

7.4.13. Medical priority will not normally be awarded in the following circumstances:

- a) Where the applicant has a health issue, however severe, that is not impacted by the accommodation occupied
- b) Health problems that are not affected by housing or cannot be improved by moving
- c) Where a move would only make a marginal improvement to the applicant's condition
- d) Medical impacts caused by housing defects that are likely to be rectified in a reasonable time frame.
- e) Where another reasonable course of action is available to the applicant to resolve their difficulties.
- f) Time-related medical problems (e.g., pregnancy-related problems or a broken leg)
- g) Disrepair problems not impacting significantly on the applicant's medical condition. (Note under the policy an applicant may receive priority separately for living in unfit or unsatisfactory housing depending on the assessment made of their circumstances and impact).
- h) Overcrowding not impacting significantly on the applicant's medical condition. (Note under the policy an applicant may receive priority separately for being overcrowded).
- i) If the situation can be resolved by equipment or minor adaptations which can be implemented in a reasonable period of time.

7.5.1 How to Apply

7.5.2. 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.

- 7.5.3. 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 and or 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.
- 7.5.4. All applications to join the Scheme must be made using the prescribed online, which can be found here (insert hyperlink). Assistance is available for any person who is unable to complete the application form.
- 7.5.5. 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).
- 7.5.6. Supporting documentation
- 7.5.7. 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.

7.5.8. 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 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.

7.6. Cancelling a housing application

7.6.1. A housing applicant's housing application will be cancelled, subject to any appeal 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, subject to an appeal.
- 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, or equivalent form of tenure.
- 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.

7.7. Renewal of Applications

7.7.1. Applicants will be notified to renew their application annually, from the anniversary of their effective date 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.

7.8. Application processing standards

7.8.1. The Local Authority will aim to process applications within 33 working days, after an Applicant has submitted a completed application and all supporting documents.

7.8.2. 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)

7.9. Who can be included on an application

7.9.1. 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.

7.9.2. 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 and or joint applicant.
- c) Adult children.
- d) Other adults who are dependent on the applicant and or joint applicant.

7.9.3. 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.

7.9.4. 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.

7.10. Dependent children

7.10.1. 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.

7.10.2. 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.

7.10.3. Factors that that Local Authority will consider include:

- a) Who has the main parental responsibility of the child and or children?
- b) What is the child's main and principal home?
- c) What address is registered with GP, School and or Nursery?
- d) Who predominantly cares for the child?

7.11. Adult Children, other non-dependents

7.11.1. 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.

7.11.2. 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.

7.11.3. The Local Authority may require such non-dependent members of the household (including adult children, or extended family members) to apply for housing separately.

7.11.4. 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.

7.11.5. 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.

7.12. Split and non-traditional households

7.12.1. 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.

7.12.2. 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.

7.12.3. 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.

7.13. Children in care

7.13.1. 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.

7.14. Provision and receipt of care

7.14.1. 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.

7.14.2. 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.

7.15. Verification

7.15.1. 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 G.
 - b. Bedroom entitlement will be determined in accordance with the criteria set out in Appendix H.
- i) Advise them of their right to request a review of any of the above matters. See Chapter 10 for further details.

7.15.2. If an Applicant is found to have more than one housing need, the Applicant will be awarded the Band which gives the highest priority.

7.16. Effective date

7.16.1. 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.

7.17. Missing Information and incomplete applications

- 7.17.1. 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 may cancel the application.
- 7.17.2. 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.
- 7.17.3. 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.

7.18. Application decisions

- 7.18.1. 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).
- 7.18.2. Where the notification confirms a successful decision, Applicants will also be told when realistically they might be offered a letting of social rented housing.
- 7.18.3. 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.
- 7.18.4. 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.
- 7.18.5. 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.

7.19. Change in circumstances

7.19.1. Applicants whose circumstances change (i.e., change of address and or household changes once they have been accepted onto the Scheme must notify the Local Authority of such changes.

7.19.2. 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.

7.19.3. Where there is a change to an Applicant's or a member of their household medical and or welfare need, the Applicant will need to complete the online medical questionnaire and provide supporting documentation from a GP or medical professional.

7.19.4. 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.

7.20. Band changes as a result of a change of circumstance

7.20.1. 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.

7.20.2. 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.

7.20.3. 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.

7.20.4. If as a result of a change in circumstances an Applicant becomes ineligible or disqualified, then they shall cease to be a member and will be removed from 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

7.21. Deliberately worsening circumstances

7.21.1. An Applicant or a member of their household who has deliberately worsened their housing circumstances to qualify for an allocation of social rented housing or to gain a reasonable preference or an additional preference for an allocation of social rented housing may have the level of priority with the application demoted to Band D for a period of 12 months from the date of the decision.

7.21.2. An applicant will have deliberately worsened their housing circumstance if:

- Action or inaction by the applicant, resulted in the applicant no longer occupying accommodation;
- **And** the actions or inaction was the primary cause of the applicant no longer occupying accommodation;
- **And**, the accommodation was suitable for the applicant;
- **And** it would have been reasonable for the applicant to have continued to occupy the accommodation.

7.21.3. Examples could include:

- 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.

8.0. Prioritisation of applications

8.1.1. Once a 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 7.16.) will be used to prioritise between applicants.

8.2. Band A

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference	
Category of Housing Need	Summary Guide of Criteria
Homeless households owed a main homeless duty under s.193 (2) by West Northants Council	<p>Applicants who are owed a main homeless duty under Section 193 (2) (or for any applicant still owed a Section 195 (2) duty prior to the introduction of the Homelessness Reduction Act in 2018).</p> <p>This means households that have been assessed as being owed the main homeless duty for being unintentionally homeless and in priority need and are not accommodated in long term suitable temporary accommodation.</p>
Homeless households owed a relief duty under Section 189B (2) and likely to be owed a main duty if the relief duty ends unsuccessfully	Applicants who are owed a relief duty under Section 189B (2) where the applicant is, at the point of that 189B duty being accepted, considered likely to be in priority need and unintentionally homeless, whether a decision to that effect has been made or not, and the applicant is accommodated in interim temporary accommodation.
Emergency medical or disability	A Band A award is for applicants who are suffering sudden or severe progressive life-threatening medical conditions or disability and need an immediate move (e.g., to facilitate hospital discharge) because their current home is unsuitable (as it does not meet their

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference

Category of Housing Need	Summary Guide of Criteria
	<p>medical needs and / or cannot be adapted) and poses an immediate and serious danger to the individual.</p> <ul style="list-style-type: none"> • where an applicant’s condition is expected to be terminal within a period of twelve months and rehousing is required to provide a basis for the provision of suitable care; • the condition is life threatening and the applicant’s existing accommodation is a major contributory factor; • the applicant’s health is so severely affected by the accommodation that it is likely to become life threatening; • the applicant has severe mobility issues, is housebound and is unable to leave their accommodation save with assistance that will result in high risk to themselves or their carer. They have an assessed need to move to accommodation that meets their needs; • the applicant is a wheelchair user who is unable to use their wheelchair within their current accommodation and has an assessed need to move to wheelchair suitable accommodation; • the applicant’s accommodation is directly contributing to the deterioration of the applicant’s health such as severe chest condition requiring intermittent hospitalisation as a result of chronic dampness in the accommodation and the condition of the property cannot be resolved within a reasonable period of time – usually 6 months; • where overcrowding in the property leaves the applicant at risk of life-threatening infection. <p>NOTE: 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</p>

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference

Category of Housing Need	Summary Guide of Criteria
	<p>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</p>
<p>Exceptional circumstances welfare and social hardship</p>	<p>The Local Authority recognises that there may be exceptional circumstances where the only way an exceptional housing need can be resolved is through a Band A award. In the interests of fairness to all these applicants these circumstances are kept to a minimum. Examples of exceptional welfare and social hardship circumstances include, but are not limited to:</p> <ul style="list-style-type: none"> • a severe threat to life; • Victims of domestic abuse/violence; • immediately due to serious threats to one or more members of the household, or whose continuing occupation would pose a threat to the community; • cases nominated under the Police Witness Protection Scheme or other similar schemes that the Local Authority has agreed to be part of; • Sudden loss of existing home as a result of a disaster – applicant’s home is uninhabitable due flood, fire or natural disaster through no fault of the applicant and there is no prospect of the problems being remedied within a reasonable period of time i.e. six months; • an applicant who has an exceptional need that is not covered in the Allocation Scheme. For example, where child or public protection issues require rehousing or for domestic abuse where all other options to remain in the home have been considered; • a care leaver assessed as ready to move to independent settled housing with a profound disability or assessed as having a significant

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference

Category of Housing Need	Summary Guide of Criteria
	<p>vulnerability over and above the fact that they have been in care, who is assessed as needing to be housed urgently to significantly improve the impact their current circumstances are having on their disability or vulnerability;</p> <ul style="list-style-type: none"> • other exceptional circumstances as authorised by the Lead Manager for the Housing Allocation function or equivalent. <p>For any Private Registered Provider tenant, the expectation is that, where it is safe to do so, a like for like management transfer would be granted or an emergency decant provided whilst a suitable transfer can be arranged.</p>
Armed Forces	<p>The Applicant or member of the household with an urgent housing need (reasonable preference as defined in this policy) and have access to no other accommodation who:</p> <ul style="list-style-type: none"> • Are serving (and will soon leave) the regular forces and are suffering from serious injury, illness, mental ill health, or disability which is attributable to the person's service; • Has recently ceased, or will cease to be entitled, to reside in accommodation provided by the MOD following the death of that person's spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service; or • Is serving or has served in the reserve forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service.

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference	
Category of Housing Need	Summary Guide of Criteria
	For this purpose "the regular forces" and "the reserve forces" have the meanings given by section 374 of the Armed Forces Act 2006.
Private sector properties insanitary or unfit Those living in insanitary conditions where the conditions pose an ongoing and serious threat to health	<ul style="list-style-type: none"> Private sector tenants and residents of dwellings where the Local Authority's Private Sector Housing Team has determined the property poses a Category 1 hazard under the Housing Health and Safety Rating System and <ol style="list-style-type: none"> the hazard is being dealt with by a prohibition order or emergency remedial action notice or equivalent; and the Local Authority is satisfied that the problem cannot be resolved by the landlord within six months and as a result continuing to occupy the accommodation will pose an exceptionally serious risk to the applicant's health. This includes a property that has severe damp, major structural defects including subsidence, flooding, collapse of roof, or living conditions that are a statutory nuisance, and there is no prospect of the problems being remedied within a six-month time period. A private sector property either owned or rented where a statutory notice has been issued by the environmental health department that an unfit property is to be demolished under the Housing Act 2004. <p>Note: this category will not include Private Registered Provider tenancies because there is a legal requirement on social landlords to urgently remedy defects that pose a risk to their tenants.</p>
A care leaver who has had a duty of care accepted under the Children's Act by the	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

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference	
Category of Housing Need	Summary Guide of Criteria
Local Authority and is ready for independent living	<p>Children’s Act by the Local Authority and is ready and approved for move on to independent living.</p> <p>NOTE: As part of the annual fixed quote of studio/1 bedroom properties</p>
An Applicant under-occupying a social rented home within West Northamptonshire by two or more bedrooms	<p>An Applicant who is under-occupying social rented housing by two or more bedrooms, as per the criteria set out in paragraph 9.7. (Bedroom Standard).</p> <p>Where a secure or flexible council tenant will release a home with two or more bedrooms by moving to a property with fewer bedrooms than they currently have.</p> <p>NOTE: A Housing Association tenant who will release a home with two or more bedrooms are eligible if their landlord agrees that the vacated property can be used for a nomination by the Local Authority.</p>
Releasing an adapted property	<p>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.</p> <p>NOTE: The allocation of this band will be at the discretion of the Local Authority where there is an unmet need for the property occupied. This band will not apply where the adaptation does not offer a realistic solution to others.</p> <p>NOTE: A Housing Association tenant who will release an adapted property they no longer require are eligible if their landlord agrees that the vacated property can be used for a nomination by the Local Authority.</p>
Supported move-on	Approved move-on from local authority commissioned short-term supported housing and hostels, including

Band A: Exceptional and immediate need to move. These cases have been awarded reasonable preference plus additional preference

Category of Housing Need	Summary Guide of Criteria
	<p>specialist accommodation for those with mental health and residential care based on the annual fixed quota of studio/1-bedroom properties</p> <p>NOTE: The assessment criteria will normally require the following before Band A will be awarded:</p> <ul style="list-style-type: none"> • An applicant is ready to move to independent settled housing on the recommendation of the support worker/ social care service or equivalent; and • The housing service agree with this recommendation; and • The applicant is in need of medium to long term rather than short term ongoing tenancy support; and • That support package has been assessed and is in place.

8.3. Band B

BAND B: Need to Move – Reasonable preference assessed as having an urgent housing need

Category of Housing Need	Summary Guide of Criteria
<p>Applicants owed one of the following homelessness duties or are sleeping rough and do not wish to make a homeless application</p>	<p>Applicants owed any of the following homelessness duties by West Northants Council as set out below:</p> <ol style="list-style-type: none"> 1) Applicants where the Section 189(B) Relief duty has been brought to an end and an applicant has been assessed at that point as being intentionally homeless (and hasn't been disqualified under the unacceptable behaviour disqualification rule). 2) Applicants owed the Section 193 C (4) Main duty where the Prevention or Relief duty was ended by the Local Authority due to their deliberate non-cooperation. 3) Applicants owed a Section 189B (2) Relief duty by the Local Authority and not considered likely to be in priority need. 4) Applicants owed a Section 195 (2) Prevention of homelessness duty by the Local Authority and not considered likely to be in priority need.

BAND B: Need to Move – Reasonable preference assessed as having an urgent housing need	
Category of Housing Need	Summary Guide of Criteria
	<p>5) Applicants where the Section 189(B) Relief of homelessness duty has been brought to an end and the applicant is determined to be homeless but not in priority need and therefore not owed a Main homeless duty.</p> <p>6) Are sleeping rough and do not wish to make a homeless application</p>
Overcrowded by 2 bedrooms	<p>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:</p> <ol style="list-style-type: none"> 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.
Applicants living in unsatisfactory housing lacking basic facilities.	<p>Applicants without access at all to any of the following facilities verified by an environmental health officer or equivalent:</p> <ul style="list-style-type: none"> • A bathroom or kitchen. • An inside WC. • Hot or cold water supplies, electricity, gas or adequate heating. <p>Note: Applicants who have access to shared facilities re cooking, bathroom, and toilet will not qualify under these criteria.</p>

BAND B: Need to Move – Reasonable preference assessed as having an urgent housing need	
Category of Housing Need	Summary Guide of Criteria
	<p>This banding award does not include applicants sleeping rough or with no fixed abode. They will be dealt with under the homelessness criteria in this banding Scheme.</p> <p>Any decision to award Band B for this category will take into account the reasons why the applicant does not have access to these facilities and whether this is a temporary or long-term situation.</p>
Severe medical or disability grounds	<ul style="list-style-type: none"> • Where an applicant (or a member of their household) is living in accommodation with a severe, long term, medical conditions (chronic or progressive) or severe disability that means they urgently need to move because their home is assessed as being highly unsuitable and is directly detrimental to the applicants' physical or mental health. • Where an applicant's (or a member of their household) housing is unsuitable because of severe medical reasons or because of their disability. The applicant (or member of their household) is not housebound, but their current housing is exacerbating their health conditions. <p>See Section 7.4.8. for examples of when a Band B award may be awarded.</p>
Applicants 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	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.
Hardship or welfare need to move for care or support	Need to move to a particular locality in the local authority area, where failure to meet this need would cause hardship (to themselves or others). The following list is

BAND B: Need to Move – Reasonable preference assessed as having an urgent housing need	
Category of Housing Need	Summary Guide of Criteria
	<p>intended to be illustrative and in no way prescribed or definitive:</p> <ul style="list-style-type: none"> • Those who need to move to give or receive care that is substantial and on-going • Those who need to access social services facilities and are unable to travel across the local authority area • Those 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). • Those suffering from severe 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. • Those who need to take up (or continue) employment, education or a training opportunity that is not available elsewhere and who do not live within reasonable commuting distance.
Existing tenants who will release a high demand property	<p>Tenants who will:</p> <ul style="list-style-type: none"> • Move into a smaller property releasing a high demand property. • Occupy a house and wish to move to a general needs flat. <p>NOTE: Housing Association tenants who will release a home in high demand are eligible if their landlord agrees that the vacated property can be used for a nomination by the Local Authority.</p>
Older people approved for sheltered accommodation	Applicant (usually over pensionable age, but in exceptional circumstances 55+) who are assessed as likely to benefit (e.g., by retaining their independence for longer) from sheltered / supported or other specialist

BAND B: Need to Move – Reasonable preference assessed as having an urgent housing need	
Category of Housing Need	Summary Guide of Criteria
	older people's accommodation where there is a need to move but that need is not assessed as meeting the criteria for a Band A award.
Subject to MAPPA (levels 2 and 3)	Subject to Multi agency public protection arrangements

8.4. Band C

BAND C: Need to move but with a lower housing need / Right to move applicants	
Category of Housing Need	Summary Guide of criteria
<p>Insecurity that risks homelessness</p> <p>Note: For this group under the policy, after 6 months in Band C an applicant will be moved up to Band B with their effective date being the date they were put into Band B.</p>	<p>A pregnant applicant (once the pregnancy has reached 24 weeks) or applicant with a child or children who are sharing a home with family who are not part of their household and where:</p> <p>a) They have no ownership or tenancy rights, and the arrangement is short term and very insecure and only available whilst the applicant is actively seeking an offer of social housing or alternative accommodation with friends or in the private rented sector, and</p> <p>b) They were owed a prevention of homelessness duty as they were assessed as likely to become homeless within 56 days, and that duty has ended because they have been allowed to remain at home whilst they bid for social housing with their Band B priority and it is likely that they can remain for at least a year, and</p> <p>c) The family member with the interest in the home has agreed to allow the applicant to remain for at least a year.</p>
Separated family	An Applicant and their household who cannot live together as a family due to no suitable accommodation – section 7.12.
Right to move applicants	Existing social tenants of accommodation in England whom the Local Authority have assessed as qualifying under the Government's Right to Move regulations.

BAND C: Need to move but with a lower housing need / Right to move applicants	
Category of Housing Need	Summary Guide of criteria
	Allocation to applicants who qualify for this award is limited to a maximum of 1% of all lettings.
Medical	An Applicant or a member of their family are assessed as having a high medical or disability need due to detrimental effects caused by the present accommodation. Please see Section 7.4.9. for further information.

8.5. Band D

Band D:	
Category of Housing Need	Summary Guide of criteria
Seeking older person accommodation	The applicant and any other members of their household have no housing need but are eligible to be considered for, and are seeking, sheltered, supported or assisted living accommodation. The applicant's current housing tenure will determine which property type they are eligible for.
Local connection to a S106/ rural exception site	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).
Deliberately worsening circumstances	An Applicant has deliberately worsened their circumstances to gain more priority through this Scheme. See section 7.21. for more information

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.

9.1.4. 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 \(insert link\)](#).

9.1.5. 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.

9.1.6. 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.

9.1.7. 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.

9.1.8. Labelling should generally be as inclusive as possible, to maximize 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. Bidding and auto bidding

- 9.2.1. Most Applicants will be 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 cycle. This does not guarantee that they will be offered any property they might make a bid for.
- 9.2.2. In some cases, 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, this is known as Auto bid.
- 9.2.3. It is important that applicants are able to access the 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 needed 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, and where necessary auto-bidding may be applied. Applicants who fail to respond may be removed from the Scheme.
- 9.2.5. The table below summaries the bidding mechanism, the number of bids per cycle and the number of offers of accommodation that different categories of applicants are entitled to:

Band and criteria	Bidding mechanism	Number of bids per cycle	Number of offers
Band A where a statutory homelessness duty is owed	Auto-bid	Up to 3	1
Band A where a statutory homeless duty is not owed	Manual bidding - Choice, however direct offer may be made in certain	Up to 3	2

	circumstances – see section 9.3.2		
Applicant subject to MAPPA	Direct offer	n/a	1
Band B- homelessness duties	Manual bidding - choice	Up to 3	1
Band B, C and D where there is no homeless duty	Manual bidding - Choice	Up to 3	2

9.2.6. Band A – Statutory Homeless duty applicant

9.2.7. To ensure timely resolution of their housing circumstance Applicants accepted as being owed a statutory homelessness duty have their choice removed and are placed onto 'auto bid'. This is to ensure the Local Authority prevents and relieves homelessness at the earliest opportunity.

9.2.8. Applicants owned any of the statutory homeless duties will be made one suitable offer of accommodation in writing and a refusal will mean that that the Applicants banding priority for being owed a statutory homelessness duty will be removed.

9.2.9. A failure to engage in the nomination, viewing or verification process which results in a property being withdrawn, will be regarded as an implied refusal of the offer.

9.2.10. For Applicants owned a statutory homelessness duty who wish to refuse an offer of accommodation under the Scheme the additional provisions will apply:

- a) If the applicant's housing circumstances mean they could be awarded a band A-D for a housing need other than being owed a homeless duty, the Applicant will be awarded that band regardless of their decision to refuse an offer. This would mean the Applicant would be able to receive a second offer to reflect their housing need.
- b) At the point the applicant refuses an offer of social rented housing it will be kept open for 48 hours to allow the applicant to reconsider, and to seek independent advice.
- c) At the point of offer an applicant will be informed in writing that they may accept the offer and still seek a review of its suitability and if they are successful in their review a further offer will be made. If they refuse the property offered this information will also be conveyed verbally to the applicant.

d) There are special suitability / refusal rules that apply to applicants where the Local Authority has accepted a homeless duty.

- The property is the right size and type for the applicant's household
- The property is safe for the applicant's household to live in
- The property is affordable for the applicant
- Consideration has been given to the location of the property
- Consideration has been given to any special needs the applicant and their household members may have
- Consideration is given to any other relevant circumstances that the applicant has told the Local Authority about

e) If the Applicant does not have another housing need when their banding for being owed a statutory homeless duty is withdrawn they will be removed from the Scheme.

9.3. Direct offers of accommodation

9.3.1. Not all properties that become available will be advertised and offered through the CBL system. There may be circumstances where for operational or financial reasons there is a need to make a direct offer of housing outside of CBL and, in exceptional circumstances, outside of the band and date order criteria set out in this policy.

9.3.2. Specifically, this would be where there are urgent operational or financial reasons to depart from the CBL system of lettings. Examples include but are not limited to:

- 1) Where an applicant is homeless and in temporary accommodation and owed a section 189B (2) Relief duty or 193(2) Main duty under the Housing Act 1996 and a Local Authority wish to make a direct offer to move applicants out of temporary accommodation in order to manage any budgetary or legal impact on that Local Authority.
- 2) Situations where urgent re-housing is required due to an applicant's existing property being uninhabitable, or where there are serious health and safety or personal protection issues that need to be addressed, or to discharge a statutory homelessness duty.
- 3) Urgent housing need situations where, given the applicant's circumstances, it would not be reasonable to wait for a successful bid through the CBL system to deliver an offer.

- 4) Direct offers to persons who a partner Local Authority has a duty to rehouse under section 39 of the Land Compensation Act 1973.
- 5) Where an applicant is not being realistic in the areas they are bidding for and, as a result, may be occupying a temporary accommodation unit that is needed for a newly presenting homeless applicant.
- 6) Where a vacant adapted property, or a property designed to disability standards, becomes available and that property could be allocated to an applicant whose disability needs best match that property regardless of the date they were registered.
- 7) Where the decision of the Local Authority is that it is inappropriate for the applicant to participate in 'Choice Based Lettings'. For example, a vulnerable applicant nominated by Adult Social Care Department where the outcome of an assessment is that a direct let is the best letting solution for that applicant.
- 8) Other examples, including individual circumstances of some applicants subject to Multi Agency Public Protection Arrangements (MAPPA), or it is assessed presents a risk to themselves or others and it is considered inappropriate for the applicant to participate in choice-based lettings. In these cases, applicants are considered on a case-by-case basis, and the range of housing options will be considered.
- 9) Where an applicant has been referred as subject to the Witness Protection & Anonymity Orders.
- 10) 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
- 11) Hard to let properties where no suitable bids have been received
- 12) Any other circumstance that enables the Local Authority to make best use of housing stock and or respond to emerging local housing needs.

9.3.3. 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 9.9.2.

9.4. Shortlisting of applications

9.4.1. 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.

9.4.2. 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 E 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 and Part 3 EA 2010.
- 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 1998, 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.

- 9.4.3. 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.
- 9.4.4. 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.
- 9.4.5. 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 and or nominated to. Once the Applicant has made this decision, the other property will be offered to the next applicant on the shortlist.
- 9.4.6. 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. 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.
- 9.5.3. 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 and or 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 and or 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. Pre nomination and offer Verification

- 9.6.1. 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.
- 9.6.2. 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.
- 9.6.3. 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.
- 9.6.4. 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.
- 9.6.5. 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 and or 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. This standard is then compared with the number of bedrooms available for the sole use of the household. Appendix H provides further details on how the Local Authority will determine an Applicants entitlement to bedrooms.

9.7.4. 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. An offer and or nomination of accommodation

9.8.1. 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.

9.8.2. The Registered Provider may ask for additional documentation and reserve the right to carry out pre-tenancy checks.

- 9.8.3. 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.
- 9.8.4. 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.
- 9.8.5. 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 defined in the allocation of accommodation code of guidance) 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.
- 9.8.6. 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.
- 9.8.7. 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 7.14., will have their need for a spare room taken account of whenever possible.
- 9.8.8. 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.
- 9.8.9. 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.

9.8.10. 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.

9.8.11. Applicants will be informed when an offer is made whether the property will be furnished or unfurnished.

9.9. Refusals

9.9.1. 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.

9.9.2. Most Applicants are entitled to two suitable offers of accommodation, except for the following exceptions:

- i. Applicants owned any of the statutory homeless duties (Band A) will be made **one** suitable offer of accommodation through the Scheme **auto-bidding** system or in some circumstances through a direct let.
- ii. Applicants in Band B with a homelessness duty will be made **one** offer of accommodation via the Scheme's bidding system.
- iii. Applicants who are subject to MAPPA are be made **one** suitable offer of accommodation, this will be through a **direct offer**.

NOTE: Most Applicants in Band A (bar the exceptions above) will be allowed 2 suitable offers of accommodation and will be allowed to bid, however a direct offer may be made at any time due to the immediacy of their need to be rehoused.

9.9.3. 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. There are special suitability /refusals rules that apply to applicants where the Local Authority has accepted a homeless duty (see Section 9.3.2.)

9.9.4. All applicants that refuse their final offer of accommodation will not qualify for the West Northants Housing Allocation Scheme for a period of 12 months and their housing application will be cancelled.

9.9.5. The Local Authority may consider a re-application within the 12-month non-qualifying period if there has been a significant change in their circumstances through no fault of their own which adversely affects the household or would otherwise result in the West Northants Scheme band increasing.

9.10. Register Provider and or Landlord refusal

9.10.1. In some circumstances Registered Providers and or 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 and or 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.

9.10.2. If a Registered Provider and or 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 and or 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. Local Lettings

9.11.1. 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 Local Authority 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 and or 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.

9.11.2. 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.

9.11.3. 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.

9.11.4. 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 and or 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 organisation 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.

9.11.5. 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. Discretion

9.12.1. 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.

9.12.2. 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 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.

9.12.3. 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.
- D. Such decisions will be taken by the Assistant Director of Housing and Communities (or equivalent) or their delegated representative.

9.12.4. 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.

9.12.5. 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.

9.12.6. 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.

9.12.7. 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 Local Authority 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

10.1.1. 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.

10.1.2. 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

10.1.3. 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.

10.1.4. 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.

10.1.5. Notification of all review decisions, including reasons for decisions made, will be made in writing.

10.1.6. 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.

11.0. Information about this Scheme

11.1.1. 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 [\[insert hyperlink\]](#)

11.1.2. 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].

11.1.3. 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.

11.1.4. 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.

11.1.5. 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.

11.1.6. 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.

- b) Any significant alteration to any associated procedures for administering this Scheme.

11.1.7. 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.

11.1.8. If any changes relate to a major change of policy which significantly impacts on any single group, the Local Authority 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.

11.2. Co-operation with Registered Providers

11.2.1. 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.

11.2.2. 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.

11.2.3. 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.

11.2.4. 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.

11.3. Fraud

11.3.1 Every Applicant will be provided with advice about offences in relation to applications, prior to making an application. Section 171 (6) of the Housing Act 1996 explains that any person applying for an allocation of social rented housing will have committed a criminal offence if they deliberately falsify information on their application, or deliberately withhold information when applying to joint housing allocation scheme or when being made an offer of accommodation. If a person is found to be falsifying their application or withholding information, at the date of application and or at the date and offer is made, then they can be liable to pay a significant financial penalty. If subsequently a person is allocated housing and it is discovered that a person fraudulently obtained social housing in the past, then again there could be a financial penalty or a prison sentence depending on the extent of the falsification or withholding information that occurred and how long time at the lapped between when the person applied for housing and the date that the fraud was uncovered.

11.4. Other matters

11.4.1. A copy of this Scheme has been sent to the Regulator of Social Housing and the Local Government & Social Care Ombudsman.

11.4.2. 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) Domestic Abuse Act
- g) Armed Forces Act 2021.
- h) Asylum and Immigration Act 1996.
- i) Immigration and Asylum Act 1999.
- j) Children Act 2004.
- k) Equality Act 2010.
- l) Data Protection Act 2018.
- m) European Union (Withdrawal Agreement) Act 2020.
- n) 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.
- o) 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 B for a list of Registered Providers who own or manage stock in the Local Authority area).

Appendix D – Eligibility

D.1. As of November 2023 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
 1. Have acquired limited leave to enter and remain in the UK.
 2. Were frontier working before 31 December 2020, or;
 3. 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.
- D.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](#).
- D.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.
- D.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).

- D.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 section 4.4. for details.
- D.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.
- D.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.
- D.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.

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Appendix E – Housing related debt

How decisions for applicants with a housing related debt will be made

E.1. a) Applicants with debts of £1,000 or more who have not made any arrangement to address the debt

Applicants with debts of £1000 or more who have not made an arrangement acceptable to the Local Authority to address the debt. They will be ineligible to join the housing register unless the circumstances surrounding the debt are exceptional and an assessment concludes that there is no real risk of future non-payment.

E.2. b) Applicants with debts of £1,000 or more who have already made an arrangement to address the debt at the point of their application

Applicants will be permitted to join the register and be able to bid for accommodation if they have maintained a payment arrangement for at least 13 weeks and have repaid at least 25% of their original debt.

Applicants who satisfy the above will be permitted to bid for properties. All partner housing association landlords are encouraged to abide by these guidelines and to accept bids on this basis. However, a housing association to whom the debt is owed, may wish to see that a longer period of repayment has been kept to. Any requirement by the partner to whom the debt is owed for payments to be maintained for a longer period should not prevent an applicant from bidding for properties advertised by another housing association partner.

In order to encourage good financial management and discourage applicants from using doorstep lenders, who often charge high interest loans, lump sums of 50% or more for the total debt owed will be accepted but the applicant must still demonstrate that repayments have been made for at least 8 weeks prior to the lump sum payment in order to be allowed to bid.

Where a discretionary housing payment (DHP), or payment from homelessness prevention grant funding has been agreed to clear or reduce debt to the level required an application to join the register may be agreed. A decision on whether an applicant will then be allowed to bid for accommodation will be made on a case-by-case basis which will focus on whether there is still a significant risk of the applicant defaulting on rent payments for a future tenancy.

The Local Authority will not always require debts of £1000 plus to be paid in full as long as they have maintained a repayment agreement for at least 13 weeks even if this has not resulted in the repayment of 25% of their original debt. To always require the debt to be paid in full may act as a disincentive to make an attempt to repay the debt and for some applicants is likely to mean that they have to demonstrate an extended repayment period of several years before they can be

considered for accommodation. This would be unfair on applicant's who have demonstrated through their repayment actions a commitment to pay off the debt, meaning that the risk of any further debt for a new tenancy is low. Requiring a debt of £1000 plus to always be paid off in full, also makes it more likely that the social landlord will be unable to recover the debt.

E.3. Applicants with debts of £500-£999

Applicants with debts of £500-£599 will be eligible to join the register but ineligible to bid, unless the applicant can demonstrate to the Local Authority that there is a low risk of non-payment for a new tenancy. They will still be allocated a band and will accrue their time in band whilst they take action to resolve the debt as per the rules in the policy.

Evidence of a low risk of non-payment for a new tenancy could include:

- d) A history of not having housing debts,
- e) A history of regular rent payments, and
- f) A history of payment arrangements having been maintained.

Where no such evidence exists, an applicant will be unable to bid until there is evidence that:

- d) They have maintained a repayment arrangement for 8 weeks, and
- e) Reduced the debt to below £500, and
- f) Demonstrated that they have addressed the issues that caused the debt.

In order to encourage good financial management and discourage applicants from using doorstep lenders, who often charge high interest on loans, lump sums of 50% or more of the total owed will be accepted but the applicant must still demonstrate that repayments have been regularly made for at least 8 weeks prior to the lump payment in order to be allowed to bid.

Where a discretionary housing payment (DHP), or payment from homelessness prevention grant funding has been agreed to clear or reduce debt to the level required an application to join the register may be agreed. A decision on whether an applicant will then be allowed to bid for accommodation will be made on a case-by-case basis which will focus on whether there is still a significant risk of the applicant defaulting on rent payments for a future tenancy.

E.4. Applicants with debts of £101-£499

Applicants with debts of £101-£499 will be eligible to join the register and eligible to bid, unless there is clear evidence of a future risk of non-payment. Arrears of under £100 will not be considered.

Evidence of a future risk could include factors such as:

- d) A long history of housing debt,

- e) A long history of poor rent payments, and
- f) A long history of breached payment arrangements

Where such evidence does exist, the applicant will be unable to bid until there is evidence of:

- c) Maintaining a payment arrangement for 8 weeks and
- d) Demonstrating that the causes of the previous problems have been addressed.

Applicants who are disqualified for a housing related debt should notify the Local Authority immediately when they have either repaid at least 25% of their original debt so their circumstances can be reassessed. If it is agreed they can then join the housing register their effective registration date will be the date they have been assessed as qualifying for the register and will not be the date of their earlier application which resulted in the decision that they did not meet the qualification rule.

The only exception to the rent arrears or housing related debt rule is where an applicant can demonstrate that their circumstances are exceptional, and they would therefore face serious hardship or risk through not being allowed to qualify.

An exception may be considered where for example, an applicant has a good payment history but has incurred a debt as a result of a 'one off' problem, or where a tenant had to flee domestic abuse and a subsequent debt has built up for the tenancy left.

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Appendix F - Cases where provisions about allocations do not apply

- F.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.

F.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 G – Determining an Applicants’ ability to afford an allocation of social rented housing

- G.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. See Appendix E for details on housing related debt.
- G.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.
- G.3. 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.
- G.4. Any amount an Applicant is charged for occupying a dwelling e.g., rental charges must be demonstrated to be affordable for them.
- G.5. What an Applicant can afford to pay will vary according to the type of dwelling and their personal circumstances.
- G.6. Following a property being allocated, the Local Authority will wish to consider affordability as part of their processes for allocating a property.
- G.7. 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.
- G.8. 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.

- G.9. 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.
- G.10. 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.
- G.11. The following formula shall be followed to determine whether charges for a dwelling are affordable
- G.12. 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.
- G.13. Ignore any:
- a) Tenancy related debts that are statute barred.
 - b) Not accrued by the tenant.
 - c) Accrued as a result of financial abuse.
- G.14. Once the above factors have been ignored, take note the total amount of outstanding income.
- G.15. 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.
- G.16. 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.
- G.17. Where two or more people will hold a tenancy jointly, income and debts from all tenants should be taken account of.

Appendix H – Determining an Applicants’ entitlement to bedrooms, for assessing overcrowding, under-occupancy and for an allocation of accommodation

- H.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.
- H.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.
- H.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.
- H.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.
- H.5. Applicants who have contrived an overcrowding or under-occupation situation will not qualify to join the Scheme.

- H.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.
- H.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.

H.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.

H.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.

- H.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.
- H.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.
- H.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 I – Annual report

- I.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. Auto bid / Direct offers.
 - iii. Final offer.
 - iv. As a result of a review decision.

Appendix J - Glossary of terms

Term	Description
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.

Term	Description
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 Local Authority 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 Local Authority'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 and or location or across a type of property. A Local Lettings Plan would only be agreed in consultation with the Local Authority and partners and aims to bring benefits to the area e.g., to create more balanced sustainable communities.
MAPPA	Multi-agency Public Protection Arrangements
MARAC	Multi-agency Risk Assessment Conference
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.

Term	Description
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

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Appendix 1: How the Housing Allocation Scheme was Developed

This document presents a summary of responses from the ‘Have your say on the Draft West Northamptonshire Council Housing Allocation Scheme’ consultation and details how we have taken them into consideration for the final version of the West Northamptonshire Housing Allocation Scheme, which is to be implemented on 1st April 2024.

Figures 1-4 show the demographic of the respondents, whilst figures 5-18 show the numbers and percentages of those who responded to that particular question. Under each figure, there is a summary of all of the comments received that highlight the general responses to that question.

The formal consultation on the draft housing allocation scheme ran from 19th July – 26th September 2023. We had a total of **732 responses** analysed, with **445 completing** the whole questionnaire from a variety of groups and individuals including residents, registered providers, voluntary and charitable organisations, statutory bodies, and parish/town councils. There were **3751 separate comments** throughout the consultation, although not all of these were completed.

Charts 1-4 shows the overall satisfaction of responses on the consultation, broken down further to reflect each section. Table 1 shows the summary of the consultation responses and how this scheme will address those comments. Table 2 shows the issues that raised the most comments.

This Scheme was developed jointly by elected members of West Northants Council, officers, local partners and stakeholders through the following channels:

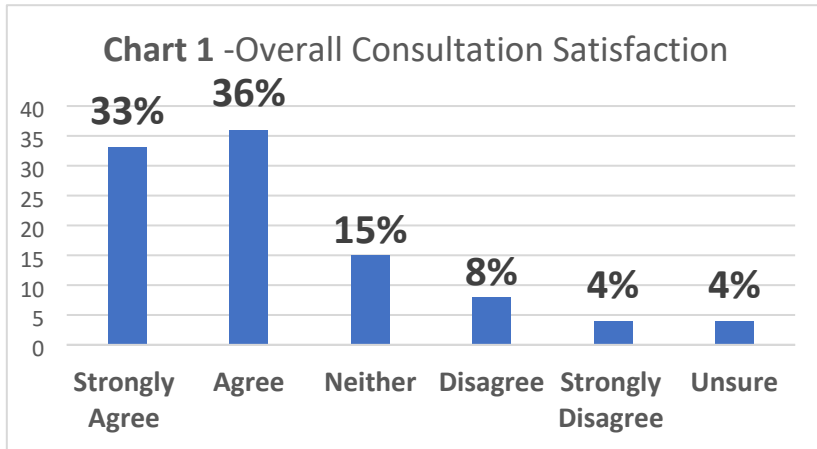
Evidence gathering – We collected a wide range of evidence across all areas which impact on Housing Allocations to understand what would be needed within a new Scheme which supersedes three existing Schemes in Daventry, South Northants, and Northampton.

Validation workshops – We held a number of workshops with different departments in the council, NPH and external organisations who will be involved with the delivery of the new housing allocation scheme to understand the context and delivery challenges they face.

Member and Scrutiny committee involvement – We attended Executive Programme Board (EPB) and Health, Education and Housing Overview and Scrutiny committee to share the draft scheme as it was developed and to receive input into the final draft of the Scheme.

Formal public consultation – We did a full public consultation to understand people’s concerns and priorities so that we could ensure the new housing allocation scheme had the right focus that matched the local housing needs of residents in West Northamptonshire.

Charts 1-4 below show the overall satisfaction from the survey questions as well as a breakdown of satisfaction in the three sections. Over two thirds of people strongly agree or agreed with all proposals within the housing allocation policy draft scheme, same can be said for the qualification, other matters, and banding sections. Only a small percentage of people strongly disagreed or disagreed with the proposals, in which table 1 at the end of the document outlines what has changed as a result of comments received throughout.



The first set of questions set out the demographics of those replying to the consultation. Figures 1-4 show who has replied.

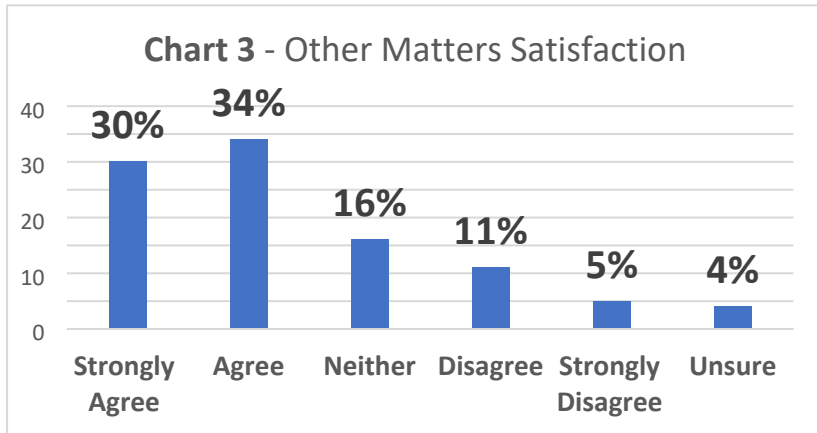
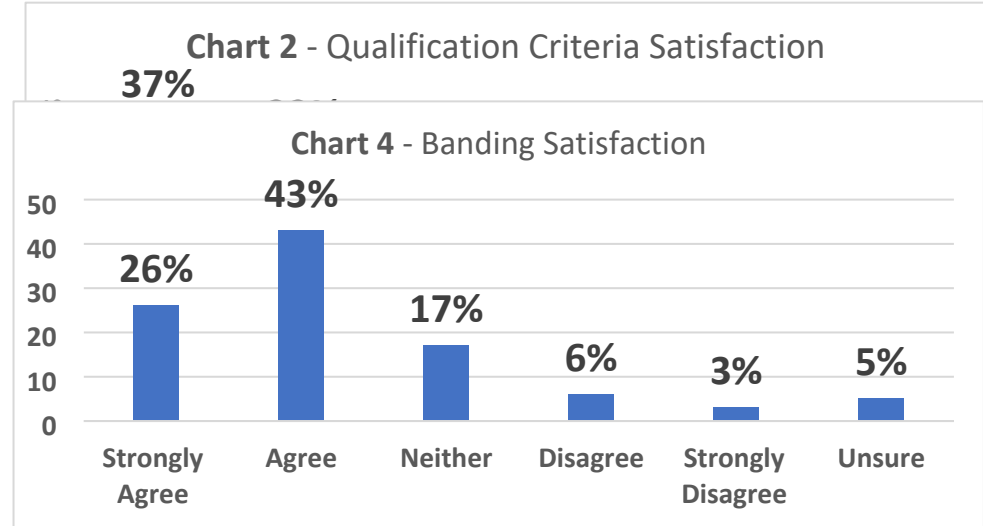


Figure 1 - Are you responding to this consultation as (select on answer):	
Answer:	Count (#)
A local resident of West Northamptonshire	624
A registered provider/housing association	18
A representative of a town/parish council	4
On behalf of a local authority	3
A representative of the voluntary sector or a community organisation	4
A representative of any other business or organisation	1
A West Northamptonshire Council councillor	3
A town or parish councillor	5
A West Northamptonshire Council employee	9
Other (please detail below)	41
Total	712
Not answered	20

Figure 2 - Are you (select one answer)		
Answer:	Count (#)	Per cent (%)
A homeowner, outright or mortgaged	70	11%
A tenant of affordable or social housing, such as a housing association tenant	200	31%
In other affordable housing such as shared ownership	4	1%
A private tenant	162	25%
A lodger or rent a room	28	4%
Living with friends or family (including parents)	100	16%
No fixed abode	31	5%
Other (please give details below)	41	6%
Total	636	100%
Not answered	96	

Figure 3 - Please let us know which of the following apply to you:		

Answer	Count (#)	Per cent (%)
I am already registered with a current Housing Allocation Scheme within West Northants	363	57%
I am thinking of registering	132	21%
None of the above	138	22%
Total	633	100%
Not answered	363	57%

Figure 4 - Are you a Northamptonshire Partnership Homes/Council tenant?		
Answer	Count (#)	Per cent (%)
Yes	132	21%
No	444	69%
Unsure	64	10%
Total	640	100%
Not answered	92	

The **Registered Providers** that replied to the consultation were as follows:

- Northamptonshire Partnership Homes (replied as a 'Local Authority')
- Northamptonshire Rural Housing Association
- Amicus Trust Ltd
- BPHA
- Places For People
- Midland Heart
- Futures Housing Group
- Grand Union Housing Group
- Anchor Homes

There were a small number of **other organisations** including parish councils that also responded, they are as follows:

- Emmaus Village Carlton
- Croughton Parish Council
- Farthinghoe Parish Council
- Old Stratford Parish Council
- Cosgrove Parish Council
- Town Council
- Change Grow live
- Northampton Children's Trust
- Resettle
- Eve
- West Northamptonshire Council

The findings from the formal public consultation are highlighted below:

Section 1 – Qualification:

Figure 5 – Qualification: Local connection		
To what extent do you agree or disagree with the local connection criteria?		
Answer	Count (#)	Per cent (%)
Strongly agree	194	34%
Agree	215	38%
Neither agree nor disagree	85	15%
Disagree	34	6%
Strongly disagree	13	2%
Unsure	28	5%
Total	569	100%
Not answered	163	

There were **264 separate comments** given on the question around Local Connection.

Most comments strongly agreed or agreed with the proposed local connection criteria, stating that local people should have priority over people moving into the area. It gives local people a better chance of securing social housing, as well as lots of comments suggesting that family support is critical.

Some neither agreed or disagreed stating that the local connection criteria were ok, but believed that if a property was vacant and no one from that area was moving in, then the bordering area should be able to move in.

Those who disagreed or strongly disagreed stated that the 2 years criteria are too long and that it discriminates against those who need to move to the area because of work commitments. Some also wanted a further definition into ‘family connection’. A couple of comments also suggested a 5 year local connection criteria. It was also mentioned that there is not enough social housing in areas where people grew up which is forcing them to look elsewhere, making the proposed local connection criteria difficult.

One comment suggested that these changes do not consider the local needs of West Northants and will cause an increase in demand.

Overall, the majority of comments were in support of the proposed local connection criteria.

Figure 6 – Qualification: Unacceptable or unreasonable behaviour		
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To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?		
Answer	Count (#)	Per cent (%)
Strongly agree	316	58%
Agree	161	29%
Neither agree nor disagree	32	6%
Disagree	17	3%
Strongly disagree	10	2%
Unsure	11	2%
Total	547	100%
Not answered	185	

There were **249 separate comments** given on the question around unacceptable or unreasonable behaviour.

Most comments strongly agree or agree with the proposed criteria stating that everyone should be able to live in a neighbourhood that is safe and peaceful. Good behaviour also encourages areas to be nice places to live. Some also believe that if people have these past convictions, then they need to face the consequences and leave people who abide the law to live in peace.

Some who agreed or neither agreed or disagreed were mostly in favour of the proposed criteria but had some comments around the term ‘unacceptable and ‘unreasonable’ being too subjective and need to stick to legal terms. Some would also like to see support given to those who have been found guilty of unacceptable or unreasonable behaviour. Some were also not confident on this being adhered to with those falling under this category still managing to get themselves on the housing register.

Those who strongly disagreed or disagreed suggested that people should be given a second chance and commented that people can change and become better and should not be held to this criteria.

Comments alluded to the timescales of this behaviour, stating if it was a long time ago then it is fine, but not if it was recent.

Overall, the majority of comments were in favour of the proposed unacceptable or unreasonable behaviour criteria.

Figure 7 - Qualification: Housing related debt		
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To what extent do you agree or disagree with the disqualification for those who have a housing related debt?		
Answer	Count (#)	Per cent (%)
Strongly agree	121	23%
Agree	166	31%
Neither agree nor disagree	108	20%
Disagree	75	14%
Strongly disagree	37	7%
Unsure	26	5%
Total	533	100%
Not answered	199	

There were **297 separate comments** given on the question around housing related debt.

Those who did strongly agree or agree and made comments believed that people should clear their debts before applying to the scheme, some commented stating why should those who do not have debt and pay their rent on time be disadvantaged over those who do not pay their rent on time.

Some of those who neither agreed or disagreed, stated that it should be done on a case-by-case basis, some people get into housing related debt from no fault of their own. The circumstances as to why people are currently in housing related debt should be considered. Some want to see what an acceptable level of payment in a payment plan is, for example is £1 enough?

Most of the comments strongly disagreed or disagreed with the proposed housing related debt criteria, stating that the current cost of living crisis and current climate has made it extremely difficult for people to keep on top of things like rent. Comments also suggested that this criteria is punishing people further who are in housing related debt and won't be able to afford a home via other means. Sometimes debt is not the fault of the individual so they should not be punished and made potentially homeless. A theme of people wanting to see exemptions for various reasons.

Overall, over half of responses strongly agreed or agreed with the proposed housing related debt criteria, however the comments leaned more towards the strongly disagreed or disagreed with a strong emphasis of this being on a case by case basis due to different personal circumstances.

Figure 8 - Qualification: Breaches of tenancies		
To what extent do you agree or disagree with the breaching tenancy criteria?		
Answer	Count (#)	Per cent (%)
Strongly agree	250	48%
Agree	193	37%
Neither agree nor disagree	43	8%
Disagree	13	2%
Strongly disagree	10	2%
Unsure	13	2%
Total	522	100%
Not answered	210	

There were **250 separate comments** given on the question around breaching tenancy conditions.

Most comments were strongly agreed or agreed with the proposed criteria for breaching of tenancy conditions, stating that tenants should know and respect the rules at all times. People who do not respect the rules do not deserve to be considered for the housing register.

Some neither agreed nor disagreed stating that most of the criteria was fine, however there were a number of comments that related to repairs and concerns that repairs were not carried out in a timely manner by the landlord would jeopardise applicants place on the housing register.

Only a small amount strongly disagreed or disagreed, stating that not everyone should be subject to sanctions within the scheme, for example, living in a shared house if just one person breaks the rules. There should also be an expanded list that covers all types of breaches that occur in social and private sector tenancies. Also, that tenants need more help than they currently receive which could lead them to inadvertently breach tenancy conditions. Some people should be given a second chance.

Figure 9 – Qualification: Property Ownership		
To what extent do you agree or disagree with the property ownership criteria?		
Answer	Count (#)	Per cent (%)
Strongly agree	220	43%
Agree	166	32%
Neither agree nor disagree	68	13%
Disagree	27	5%
Strongly disagree	15	3%
Unsure	19	4%
Total	515	100%
Not answered	217	

There were **260 separate comments** given on the question around property ownership.

There were some comments that strongly agreed or agreed, stating that if you own a property then you should not be allowed to rent a council house and should sell the house if they needed the money.

Some comments also referred to this not being polices fully and that fraudulent reports are not identified.

However, most comments suggested that this should be reviewed on a case by case basis as everyone's circumstances are different. A lot of comments leant towards those who were domestic abuse victims or those who were going through a breakup and were disabled, making it hard to find suitable properties.

Figure 10 – Qualification: Income and savings		
To what extent do you agree or disagree with the disqualification of those earning £60,000 or more?		
Answer	Count (#)	Per cent (%)
Strongly agree	218	43%
Agree	149	30%
Neither agree nor disagree	61	12%
Disagree	35	7%
Strongly disagree	31	6%
Unsure	11	2%
Total	505	100%
Not answered	227	

Figure 11 – Qualification: Income and savings		
To what extent do you agree or disagree with the disqualification of those with savings of £16,000 or more?		
Answer	Count (#)	Per cent (%)
Strongly agree	126	25%
Agree	134	27%
Neither agree nor disagree	103	21%
Disagree	81	16%
Strongly disagree	38	8%
Unsure	20	4%
Total	502	100%
Not answered	230	

There were **321 separate comments** given on the question around income and savings.

The comments were focused more around the £16k savings, those who strongly agreed or agreed suggested that if you have £16k saved up then you can at least afford to rent privately and that earning £60k is also enough to do this. Some also suggested that an increased should be applied to around £70k income and £30k savings to ensure genuine need.

Others commented that £16k would never be enough to put a deposit down on a house in today’s climate, with some suggestions that this should be raised to £25k. It was also commented that people should be able to do what they want with their money and that income and savings shouldn’t be included in the criteria. DLA and PIP should also not be included as income.

Some comments referred to a ‘large’ salary does not reflect the outgoings people may have to undertake a certain job.

Overall, most people were in favour of the income and savings proposal, however the comments lean towards £16k being outdated and needs to be reviewed.

Figure 12 – Qualification: No Housing Need		
To what extent do you agree or disagree with the disqualification of those who have no housing need?		
Answer	Count (#)	Per cent (%)
Strongly agree	133	26%
Agree	163	32%
Neither agree nor disagree	96	19%
Disagree	52	10%
Strongly disagree	37	7%
Unsure	23	5%
Total	504	100%
Not answered	228	

There were **300 separate comments** given on the question around no housing need.

The comments on this question are fairly mixed as is the overall responses. Most comments suggest that the person should be assessed for housing, and it should be based on their own personal circumstances. This who strongly agree or agree have stated that those who do not have a housing need should not even be compared to those that do have a housing need and see this questions as very straight forward.

Some have commented that the 'no housing need' has not been defined so are unable to comment on the question. Some have 'no housing need' but are constantly affected by anti-social behaviour, which is ruining their mental health, where does this sit under the no housing need criteria. Comments also suggested that if you have no housing need then you should not be allowed on to the register.

There were comments that stated people should be allowed to move if they are uncomfortable in their current home.

Section 2 – Other Matters:

Figure 13 - Other matters, Deliberately worsening circumstances		
To what extent do you agree or disagree that those who have purposely worsened their housing circumstances should be given the lowest priority?		
Answer	Count (#)	Per cent (%)
Strongly agree	171	35%
Agree	180	37%
Neither agree nor disagree	78	16%
Disagree	30	6%
Strongly disagree	13	3%
Unsure	19	4%
Total	491	100%
Not answered	241	

There were **291 separate comments** given on the question around deliberately worsening circumstances.

A high number of comments stated that people strongly agree or agree with this proposed criteria, suggesting that if you are deliberately worsening your circumstances then you should indeed be disqualified from the housing register, as other people are being honest and abide by the rules.

Those who neither agree or disagree stated that it needs to be looked into as to why people would deliberately worsen their circumstances, they could be fleeing domestic abuse or have mental health problems.

A lot of comments focused around not being able to either define what is 'deliberate' and also proving if they have deliberately worsened their circumstances. This needs to be reviewed and explained in more detail.

Figure 14 - Other matters, Number of offers		
To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property?		
Answer	Count (#)	Per cent (%)
Strongly agree	118	24%
Agree	156	32%
Neither agree nor disagree	75	15%
Disagree	80	17%
Strongly disagree	36	7%
Unsure	19	4%
Total	484	100%
Not answered	248	

There were **329 separate comments** given on the question around number of offers.

Those who strongly agree or agree stated that if the person needs a house, then they should take up the offer. Responses suggested that people are on the housing register to be housed and that turning down this number of offers goes against the reason they are on the housing register in the first place.

There were concerns that the blanket approach in adopting a Scheme that allows 3 offers could have implications on trying to manage those households in temporary accommodation for those owed a statutory homelessness duty, but also could in higher refusal rates and impact on void relet time.

Other suggested that the adverts need to have more detail such as pictures of the property, everyone should be considered on a case by case basis with investigations in to why someone has refused an offer, it could be for a number of reasons such as the area not being suitable for them.

There were comments that suggested a range of alternative number of offers should be given. Some stated that people should be able to turn down as many as the like until they are offered something that is suitable for that individual, others wanted 4 or 5 refusals. Some also stated that 12 months was too long if all offers were refused and that 6 months was more reasonable.

Some were suggesting that the area needs to feel safe for them and will not accept somewhere that could harm their health. Should retain priority until a suitable property is found, most people will accept if it is suitable for them. MAPPA applicants should be given the same number of refusals.

Some stated that definitions of ‘reasonable’ and ‘acceptable’ need to be explained in more detail.

Section 3 – Prioritisation of Applicants:

Figure 15 - Prioritisation of applications, Band A		
To what extent do you agree or disagree with Band A being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	176	37%
Agree	207	43%
Neither agree nor disagree	49	10%
Disagree	24	5%
Strongly disagree	6	1%
Unsure	16	3%
Total	478	100%
Not answered	254	

There were **294 separate comments** given on the question around prioritisation of Band A.

Most people strongly agree or agree with the criteria within Band A. Comments suggest that people are happy with the criteria and that those who need housing the most should indeed be in the top priority band.

A number of comments suggested that they are surprised Homeless categories have been left out of the top band and have called to have this put in Band A.

Some have suggested that urgent medical need should be in Band A. Some have also asked how people will prove they are entitled to be placed in their bands.

There was a suggestion around making Downsizing its own band, as well as having an emergency band. Some also suggested that there is a lot of criteria in band A which makes it very difficult for anyone in the lower bands to be housed.

Figure 16 - Prioritisation of applications, Band B		
To what extent do you agree or disagree with Band B being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	122	26%
Agree	224	47%
Neither agree nor disagree	72	15%
Disagree	25	5%
Strongly disagree	6	1%
Unsure	23	5%
Total	472	100%
Not answered	260	

There were **303 separate comments** given on the question around prioritisation of Band B.

A lot of responses either strongly agreed or agreed and stated that they had no problem with what was in Band B. However, most of the comments had suggested what they thought needs to be moved around. Again, a lot of comments stated that homeless should be in Band A, and that people in Band B get forgotten due to those in Band A getting the priority.

Some have stated that fostering should not be in this band as they chose this profession and should sort their own housing, as well as stating that people could use fostering to gain a bigger house and then stop fostering once they move in. Some have also suggested that people have more children on purpose and should be placed in Band D.

Some have suggested that MAPPA should not be in Band B as this is rewarding illegal/criminal behaviour.

Others have stated that the highest medical need should be in Band A as well as care leavers.

Some have stated that priority should only be given to those who have been on the housing register the longest.

Figure 17 - Prioritisation of applications, Band C		
To what extent do you agree or disagree with Band C being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	83	18%
Agree	205	44%
Neither agree nor disagree	104	22%
Disagree	34	7%
Strongly disagree	17	4%
Unsure	21	5%
Total	464	100%
Not answered	268	

There were **308 separate comments** given on the question around prioritisation of Band C.

Most comments for Band C were around the intentionally homeless criteria, most who commented around this stated they those who are intentionally homeless should not be considered for the housing register at all. Others though have stated that certain circumstances such as domestic abuse could be a reason for this, and each case should be looked at individually.

Some asked for an example or a definition of intentionally homeless. Some have suggested overcrowding should be in a higher band.

Some clarity to be given on the medium medical welfare was suggested.

Figure 18 - Prioritisation of applications, Band D		
To what extent do you agree or disagree with Band D being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	112	24%
Agree	178	39%
Neither agree nor disagree	99	22%
Disagree	29	6%
Strongly disagree	18	4%
Unsure	24	5%
Total	460	100%
Not answered	272	

There were **295 separate comments** given on the question around prioritisation of Band D.

Most people strongly agreed or agreed with the criteria in Band D, although the comments had varying suggestions.

A lot of comments stated that local connection should be placed in a higher band and that people should not be disadvantaged to live in a place where they grew up, especially in villages.

Some comments also suggested that Band D should be taken out completely as they feel people will never get housed and is pointless.

It was asked for 'deliberately' to be defined. Some have suggested that people who have deliberately worsened their circumstances should be completely disqualified.

General Comments

There were **415 separate general comments** at the end of the consultation.

A lot of the general comments alluded to that respondents' personal circumstances, however there were a lot of suggestions and overall thoughts about the scheme as a whole.

Overall comments are positive, people have stated that bringing the scheme under one WNC scheme will benefit the area. It is very important to keep local family connection when considering the content of the scheme.

There were a lot of comments that suggested research needs to take place into the individual circumstances before making any decisions, an emphasis within the comments stated that people need to be listened to more, especially around refusing offers. Some people cannot help their situations and should not be punished for this.

Some comments alluded to the timeframe in which this scheme is being worked on, asking why this is coming down to the final months before it needs to be implemented when the council has had 3 years to complete it.

People's mental health needs to be taken into consideration a lot more when making decisions. Some people commented that homeless applicants should not be allowed to refuse any offers at all.

People should be allowed to move up priority bands after a certain timeframe of being in a particular band.

Some also suggested that more work should be focussed on building social housing rather trying to place people into bands.

Table 1: Summary of consultation comments and how the housing allocation scheme is responding

	You said....	Summary	We did...
Section 1 – Qualification			
1	Family Connections should be made clearer in the scheme document.	<p><u>Question 1 (Figure 5)</u> To what extent do you agree or disagree with the local connection criteria?</p> <p>Questions were asked in the consultation feedback around making the ‘family connection’ criteria clearer within the scheme document.</p> <p>The consultation draft scheme provided a definition of family associations and explained this is limited to immediate family members.</p> <p>It also set out the qualifying criteria for employment and family connection</p>	<p>Based on the consultation responses, the definition of family association (now referred to a ‘close family connections’, and the criteria around employment has been rewritten to define them much more tightly.</p> <p>The definition of ‘close family’ has been more narrowly defined to include ‘spouse or partner, mother, father or other legal guardians, brother, sister or adult son or daughter.</p> <p>Change to draft Scheme.</p>
	Local connection of 2 years is too long.	<p><u>Question 1 (Figure 5)</u> To what extent do you agree or disagree with the local connection criteria?</p> <p>The consultation draft Scheme set out that a local connection can be established by virtue of two years’ residency, close family connections and employment</p>	<p>The Scheme needs to match demand to supply, and this is balanced against limited supply of affordable housing. Applying a local connection criteria can support this. The local connection criteria being proposed is in line with neighbouring local authorities. There are also some exceptions to the local connection – see section 5.3.4</p> <p>No change to Scheme</p>

2	<p>People with convictions should be disqualified from the scheme if they are serious and recent.</p>	<p><u>Question 2 (Figure 6)</u> To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?</p> <p>The meaning of unacceptable behaviour for the purpose of this scheme will apply where an Applicant, or any member of their current or prospective household, has determined that, in the view of the Local Authority, makes then at the time of their application, or since their applicant, unsuitable to be a tenant.</p> <p>The Scheme will not take account of any behaviour relating to a spent conviction. Unacceptable behaviour is set out on section 5.4.1 of the Scheme.</p>	<p>The Rehabilitation of Offenders act 1974 prohibits any organisation or person taking account of spent convictions any person might have.</p> <p>It is considered that the final draft Scheme is comprehensive around unreasonable behaviour, however some minor changes to wording has been made.</p> <p>Change to draft Scheme.</p>
3	<p>People should be helped with their unacceptable and unreasonable behaviour; they might have acted this way due to a number of reasons such as mental health.</p>	<p><u>Question 2 (Figure 6)</u> To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?</p> <p>The Council will provide general advice and assistance and has a duty to provide information and help to any person who seeks it, regardless of if the person is an applicant of the housing allocation</p>	<p>Each application will be assessed on a case-by-case basis, and the assessing officer will determine whether an applicant should not qualify based on their unacceptable behaviour.</p> <p>No change to Scheme.</p>

		scheme or intending to make an application.	
4	What if I feel like I my previous unacceptable and unreasonable behaviour has been dealt with.	<p><u>Question 2 (Figure 6)</u> To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?</p> <p>Housing allocation law allows any person that might have been previously declared as ineligible or disqualified from joining a housing allocation scheme, to reapply at any time when the matters that caused them to be ineligible and or disqualified, are no longer relevant. Therefore, applicants can reapply to the Scheme at any time they believe their conviction(s) are no longer relevant.</p>	<p>Applicants cannot be permanently excluded from applying to or joining a housing allocation scheme.</p> <p>No change to Scheme.</p>
5	<p>What actually is housing related debt and can this be made clearer in the scheme document.</p> <p>Concern that people with housing related debt will not be able to afford a home via other means.</p>	<p><u>Question 3 (Figure 7)</u> To what extent do you agree or disagree with the disqualification for those who have a housing related debt?</p> <p>The consultation draft Scheme outlined details of housing related debt, and the categories of debt that would be disregarded. t. The emphasis on housing related debt was around an applicants' willingness to address the debt and provide evidence of regular affordable payments to reduce the debt.</p>	<p>Based on consultation responses it was recognised that this part of the Scheme may be difficult to understand, and it was felt that clearer criteria was required.</p> <p>The final draft Scheme set out an approach depending on the level of debt and the decisions that will be made in relation to housing related debt.</p> <p>The Scheme still retains the emphasis on the evidence that the applicant is maintaining regular / consecutive affordable payments to reduce the debt.</p>

			Change to the Scheme.
6	Repairs are always left unattended to by the Landlord, and it is the tenants who are punished, how can this be emphasised in the scheme document in terms of repairs under this section.	<p><u>Question 4 (Figure 8)</u> To what extent do you agree or disagree with the breaching tenancy criteria?</p> <p>The consultation draft Scheme set out the areas where an applicant may have breached tenancy conditions which includes purposely failing to report repairs or failing to allow contractors to enter a property to carry out maintenance.</p>	<p>It is considered that the final draft Scheme is reasonable in its approach to possible breaches of tenancy</p> <p>No change to Scheme.</p>
7	Some people lie about not owning a property when they actually do.	<p><u>Question 5 (Figure 9)</u> To what extent do you agree or disagree with the property ownership criteria?</p> <p>The consultation draft Scheme included the consequences around withholding / providing misleading information on the housing register application.</p>	<p>The final draft Scheme includes a section (11.3) on Fraud and advice about offences in relation to applications if they deliberately withhold information, provide misleading information etc. Further information in relation to fraud has been added</p> <p>Change to Scheme.</p>
8	It needs to be clearer in the document what the exemptions are for people who already own a property.	<p><u>Question 5 (Figure 9)</u> To what extent do you agree or disagree with the property ownership criteria?</p> <p>The consultation draft Scheme provided information with regards to property ownership and what exemptions applied. See section 5.7.1</p>	<p>Exemptions to disqualification due to homeownership are set out at section 5.7.4 of the draft Scheme.</p> <p>No change to Scheme.</p>

9	Some disagree with the earnings and savings limits that are outlined in the scheme document.	<p><u>Question 6 & 7(Figure 10 & 11)</u></p> <p>To what extent do you agree or disagree with the disqualification of those earning £60,000 or more?</p> <p>To what extent do you agree or disagree with the disqualification of those with savings of £16,000 or more?</p> <p>These limits are in line with central government’s policies.</p>	<p>The Department of Work and Pensions (DWP) use the £16,000 savings threshold when determining claims for welfare benefits. The Scheme also sets out that this upper savings limit will change in line with the DWP Benefit and Pension rates.</p> <p>An income cap of £60,000 is used by DLUHC and the regulator of social housing for their policy to determine affordable rents.</p> <p>No change to Scheme.</p>
10	It would great if the scheme document outlined what income is relevant and what is not.	<p><u>Question 6 & 7(Figure 10 & 11)</u></p> <p>To what extent do you agree or disagree with the disqualification of those earning £60,000 or more?</p> <p>To what extent do you agree or disagree with the disqualification of those with savings of £16,000 or more?</p> <p>This is outlined in Appendix E on what will be considered as income.</p>	<p>No change to Scheme.</p>
11	What does ‘no housing need’ actually mean and can there be a clear criteria.	<p><u>Question 8 (Figure 12)</u></p> <p>To what extent do you agree or disagree with the disqualification of those who have no housing need?</p> <p>The consultation draft Scheme provided information on ‘no housing need’.</p>	<p>The final draft Scheme has incorporated more clarity on ‘no housing need’ and sets out that if none of the circumstances as defined in the priority bands are relevant to the applicant then they will be regarded as having no housing need.</p> <p>Change to Scheme.</p>
Section 2 – Other Matters			

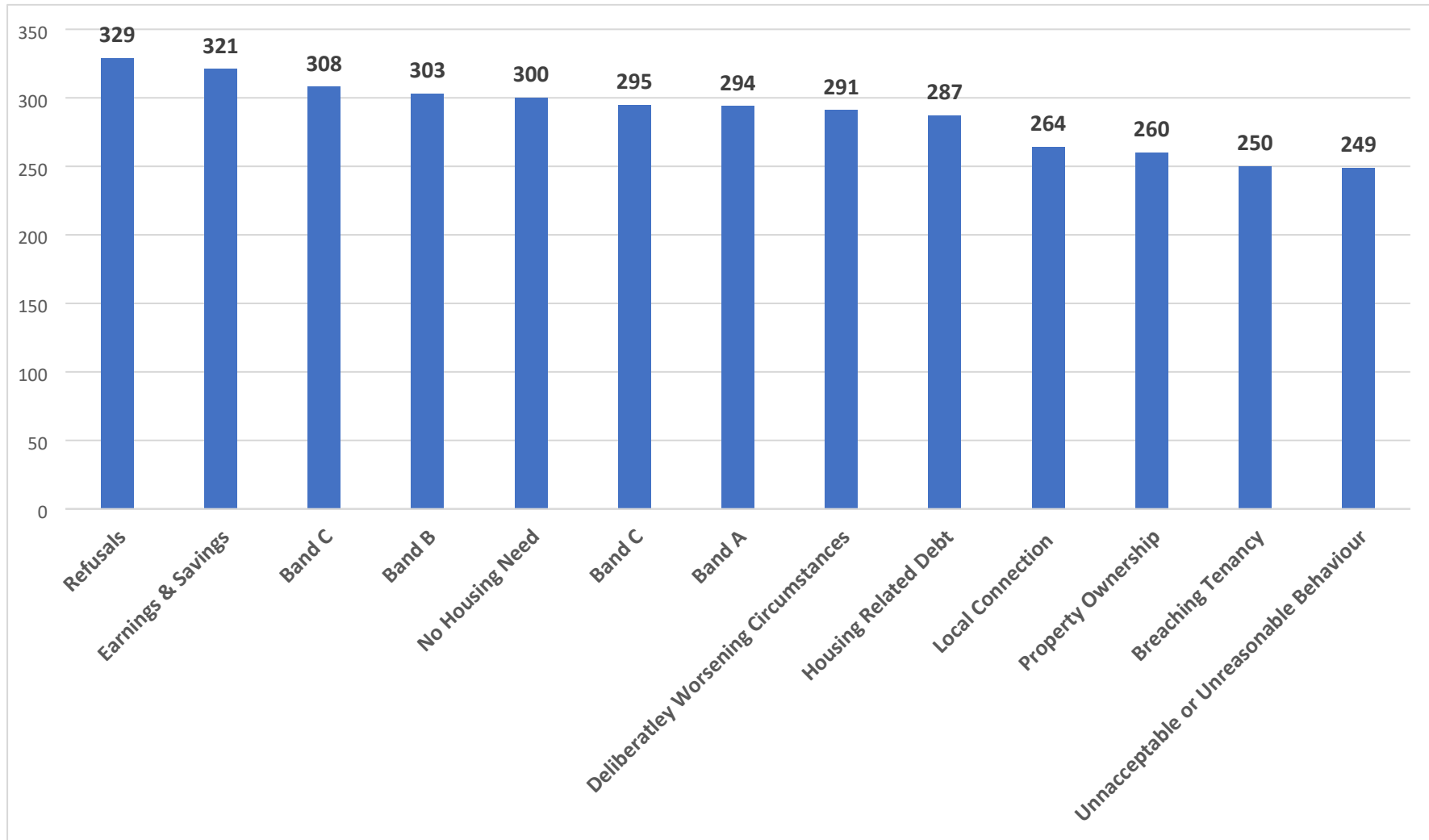
1	There needs to be a definition and a clear formula of what deliberately worsening circumstances actually means and how it is evidenced.	<p><u>Question 9 (Figure 13)</u> To what extent do you agree or disagree that those who have purposely worsened their housing circumstances should be given the lowest priority?</p> <p>There is a section on deliberately worsening circumstances, this will be made clearer in the draft scheme.</p>	<p>The final draft Scheme has been changed to make it clearer on what circumstances could be considered as deliberately worsening circumstances – see section 7.22.</p> <p>Change to Scheme.</p>
2	If the applicant has evidence that shows why they refused offer, this should be considered.	<p><u>Question 10 (Figure 14)</u> To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property?</p> <p>The consultation draft Scheme sets out that when an offer is refused, an assessment will be made as to whether the offer was suitable. The circumstance of each refusal will be considered on a case-by-case basis. Section 9.4.3 of the Scheme sets out that Applicants have a right to request a review if they disagree with a decision.</p>	<p>The final draft Scheme is proposed to be a choice-based lettings scheme which means that many applicants will have choice over the areas in which they reside The draft Scheme has been updated to provide clear rules that apply and the process if an Applicant refuses on offer of accommodation</p> <p>Change to Scheme.</p>
3	There are risks of adopting a Scheme that allows 3 offers – this approach could result in higher refusal rates and impact on void relet time. There would also be an impact on trying to manage temporary accommodation for those owed a statutory homelessness duty.	<p><u>Question 10 (Figure 14)</u> To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property?</p> <p>The consultation draft Scheme was proposing that most applicants would</p>	<p>The final draft Scheme has been amended based on consultation feedback and the risks of adopting this approach. The draft Scheme now proposals that most applicants will be entitled to two suitable offer of accommodation, except for certain exemptions: Applicants owed any of the statutory homeless duties / and those applicants who are subject to</p>

		receive 2 offers of accommodation, with the penalty on the refusal of the 3 rd offer	MAPPA will be made one suitable offer of accommodation, either through auto-bidding or a direct offer. Change to Scheme.
4	The amount of time an applicant suspended from the housing register after refusing more than 2 offers should be 6 months and not 12 months.	<u>Question 10 (Figure 14)</u> To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property? The consultation draft Scheme was proposing that following an Applicant exhausting their offer threshold, their application would be given a reduced priority – moved to Band D.	The final draft Scheme has been amended based on consultation feedback, and now proposes that once an Applicant has exhausted the applicable offer threshold, if they refuse a final suitable offer, they will be disqualified from Housing Allocations Scheme for a period of 12 months. Change to Scheme.
Section 3 – Banding			
1	There are so many categories in Band A, those in any of the other bands will never be housed.	<u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band A being awarded in these circumstances? Band A includes housing circumstances that are exceptional and an immediate need to move. Although there are a number of categories in this priority Band, the percentages of people in Band A should be relatively low.	Band A includes housing circumstances that are exceptional and an immediate need to move. Although there are a number of categories in this priority Band, the percentages of people in Band A should be relatively low No change to Scheme.
2	People in temporary accommodation should be moved into Band A.	<u>Question 11 (Figure 15)</u>	Following consultation feedback, those households who are owed a main homeless duty under s.193

		<p>To what extent do you agree or disagree with Band A being awarded in these circumstances?</p> <p>The consultation draft Scheme proposed that most statutory homelessness, including those in temporary accommodation would be placed in Band B.</p>	<p>and owed a relief duty under s.189B (2) and likely to be owed a main duty if the relief duty ends unsuccessfully and the applicant is accommodated in interim temporary accommodation are now placed in Band A.</p>
3	MAPPA applicants should not be included within the scheme.	<p><u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band B being awarded in these circumstances?</p> <p>The consultation draft Scheme had MAPPA applicants within band B.</p>	<p>MAPPA applicants will remain in Band B as their criminal involvement has to be relevant to the housing register only. This will be made clear in the new scheme document.</p> <p>No change to Scheme.</p>
4	Care leavers should be moved into Band A.	<p><u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band B being awarded in these circumstances?</p> <p>The draft consultation Scheme had care leavers in Band B,</p>	<p>The final draft Scheme has changed the priority banding for care leavers who have a duty of care accepted under the Children’s Act by the Local Authority and are ready for independent living are to be moved into Band A from Band B</p> <p>Change to Scheme.</p>
5	Why are there no homeless categories in Band A, they need to be moved here.	<p><u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band B being awarded in these circumstances?</p> <p>The draft consultation Scheme placed all of the homelessness duties into Band B.</p>	<p>Following consultation feedback, those households who are owed a main homeless duty under s.193 and owed a relief duty under s.189B (2) and likely to be owed a main duty if the relief duty ends unsuccessfully are to move up into Band A, and the other homelessness duties remain in Band B.</p> <p>Change to Scheme.</p>

6	Band D should be removed as no one will ever be housed in this band.	<p><u>Question 11 (Figure 15)</u></p> <p>To what extent do you agree or disagree with Band D being awarded in these circumstances?</p> <p>The consultation draft Scheme included those applicants, Band D will need to remain for those people who do not fit into any of the other categories.</p>	<p>Band D incorporates a number of different categories including those applicants who are demoted. In some cases, people in band D can be housed. This band will need to remain for those people who do not get matched into any of the other bands.</p> <p>No change to Scheme.</p>
4. General			
1	Will there be some form of FAQ's set up?		FAQ's will be available for applicants which outline answers to the frequently asked questions relevant to the new housing allocation scheme document.
2	What happens if people do not bid on properties?		Section 9.2.3 of the final draft Scheme sets out that applicants are expected to bid regularly. If an Applicant does not bid, contact will be made to assess the reason and where necessary auto-bidding may be applied. Applicants who fail to respond may be removed from the Scheme

Table 2: Issues that raised the most comments





WEST NORTHAMPTONSHIRE COUNCIL

CABINET

14 November 2023

Cabinet member for Children, Families & Education – Councillor Fiona Baker

Report Title	Northamptonshire Corporate Parenting Board Annual Report 2022-23
Report Author	Thomas Norford, Corporate Parenting Project Officer, Northamptonshire Children's Trust. Thomas.Norford@NCTrust.co.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	11/10/2023
Chief Finance Officer (S.151)	Martin Henry	11/10/2023
Other Director	Rebecca Wilshire Director of Children's Services (acting up) Rebecca.Wilshire@westnorthants.gov.uk	07/09/2023
Communications Lead/Head of Communications	Becky Hutson	11/10/2023

List of Appendices

Appendix A – Northamptonshire Corporate Parenting Board Annual Report 2022 - 23...

1. Purpose of Report

- 1.1. To provide Cabinet with an update on the Northamptonshire Corporate Parenting Board Annual Report and to seek Cabinet's approval on the Report being shared at the next Full Council meeting.

2. Executive Summary

1.2. The annual report is structured as follows:

- **Executive Summary.** Summarising the report as a whole.
- **Governance and Statutory Context.** Sets out the legal underpinning of corporate parenting, and the structure and role of the Board, including in light of the creation of the Trust and creation of two unitary councils.
- **Board activity.** Summarises the activity of the Board during the reporting period, including meeting arrangements, membership and service reports.
- **Young people's participation and successes.** Including details of the summer celebration event for children in care, and how the Board celebrates and includes young people.
- **Corporate Parenting Board diagnostic.** Details about a diagnostic exercise carried out with the Local Government Association, with identified strengths, risks and opportunities for development.
- **Northamptonshire Children Trust's (NCT's) Improvement Plan progress.** Setting out progress achieved and areas for development under the improvement plan's six key headers.
- **Appendix: four priorities.** Progress and areas of development in respect of the four priorities set out in the Corporate Parenting Strategy 2021-25.

3. Recommendations

- 3.1 It is recommended that the Cabinet note the content of the Northamptonshire Corporate Parenting Board Annual Report that gives an overview of the Corporate Parenting Board and its oversight, challenges and activities.
- 3.2 Note that The NCT Corporate Parenting Strategy 2021-25 sets out four key priorities including updates on each areas progress.
- 3.3 Recommend that the report is taken to the Councils' Full Council meetings for consideration.

4. Reason for Recommendations

4.1 Reason for Recommendations:

- To promote and monitor the Trust's corporate parenting strategy.
- To encourage all members and employees to recognise their role as corporate parents.

4.2 Alternative Options Considered:

4.3 No other options considered

5. Report Background

5.1 Local authorities and their partners are responsible for ensuring that care-experienced children and young people are as safe and well cared for as any other child. This responsibility is called

‘corporate parenting’ and applies equally to children who have entered the UK from overseas and are separated from their families. Corporate parenting duty rests not only with social workers and their managers, but also any other agency that provides services and support to children in care such as health services, housing departments, the police and schools. Corporate parents have specific duties for young people leaving care and making the journey to independence.

- 5.2 The report sets out the role, structure and activity of the Corporate Parenting Board, including progress achieved against the NCT Improvement Plan and the Corporate Parenting Strategy.

6. Issues and Choices

- 6.1 NCT produce an Annual Report and an Annual Review which gives an overview of the whole service including Corporate Parenting. The Annual Report will give further overview of any issues.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The annual report sets out the Councils’ corporate parenting responsibilities and aspirations for children and young people and is intended to help the local authorities devote appropriate finances and resources to meeting these aims.

7.2 Legal

- 7.2.1 The annual report sets out the legal framework for local authorities’ corporate parenting responsibilities. The recommendations of the report are intended to help the local authority meet its legal corporate parenting responsibilities.

- 7.2.2 The Board itself is not a statutory body. However, selected service reports are required to be seen by a suitable oversight body, and Board fulfils this function.

- 7.2.3 The annual report aims to help the council and NCT meet its corporate parenting objectives and priorities:

- 7.2.4 Four priorities for children in care and care leavers are set out in the NCT Corporate Parenting Strategy 2021/25:

- Live Safe, Be Safe
- Fulfil Potential
- Develop Resilience
- Enjoy Good Health and Wellbeing.

7.3 Risk

- 7.3.1 Relevant risks are those associated with the council and the Trust failing to meet its corporate parenting responsibilities and aspirations for children and young people, including:

- Children and young people have poor outcomes and do not achieve their potential.
- NCT and Council employees do not recognise their role as corporate parents.

7.3.2 Overall, these risks imply a deleterious impact on the outcomes for children in care.

7.4 **Consultation and Communications**

7.4.1 The report was submitted to and agreed by the Corporate Parenting Boards for West and North Northamptonshire Councils in July 2023.

7.4.2 The Council continues to work with partners including Northamptonshire Children's Trust to promote the objectives and outcomes within the report.

7.5 **Consideration by Overview and Scrutiny**

7.5.1 This report has not been considered by the councils scrutiny committee

7.6 **Climate Impact**

7.6.1 None specifically identified

7.7 **Community Impact**

7.7.1 The recommendations aim to improve outcomes for Northamptonshire children and young people in care and care leavers, including in the community.

8. **Background Papers**

8.1 None



Northamptonshire Corporate Parenting Board Annual Report 2022 – 2023

*“Children, Young People and Families at the heart of all we do - in every decision
we make and every action we take”*

Olivia Ives
Assistant Director Corporate Parenting

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Introduction

Welcome to the annual report for Northamptonshire's Corporate Parenting Board. This sets out the activity of the Board for the 2022-23 period, and some of the exciting developments happening within Northamptonshire Children's Trust.

Corporate parenting means giving the same level of care and support that any parent would want for their own child. Parenting does not simply stop as a young person reaches maturity, so this responsibility extends to helping children in care successfully transition to independent adulthood. Celebrating children and young people is also important, and it is wonderful that we have reintroduced large-scale, annual celebration events. As well as celebrating 'headline' achievements such as sporting and academic excellence, we want to highlight the small steps our children make which add up to massive progress. This can mean simply feeling able to sit with foster carers for a meal or having a phone call with a family member.

Young people have made an increasingly important contribution to Board over the year, not least our new care-experienced Board member, and our fantastic care-experienced Apprentice Champions. There is more to do, however, to make sure young people have a major say in the operation of the Board and shaping our services.

Many innovative and far-reaching initiatives are helping to improve outcomes for Northamptonshire children and young people, and partnership working with other organisations is a recurrent theme of these initiatives. New monthly panels, for example, are helping children secure a permanent home at the earliest possible stage, and helping older young people transition to independence. The Valuing Care project, which commenced in February 2023, is helping the right resources reach the children who need them most. The project is taking place in collaboration with Impower and operates through the principles of therapeutic care.

A diagnostic exercise with the Local Government Association highlighted many strengths of the Board, as well as opportunities and areas for improvement. The outcomes of this were insightful and welcome. The decision has been taken that henceforth each council will operate its own Board, in keeping with Ofsted's requirement to assess each council's data separately. We relish this challenge, which will increase elected members' capacity to scrutinise and challenge services for children and young people in their areas.

Executive Summary

Corporate parenting means promoting the same outcomes that any good parent wants for their child. This responsibility for local authorities and their partners is set out in legislation, government publications and statutory guidance.

Northamptonshire Children's Trust delivers children's social care across the county on behalf of West and North Northamptonshire Councils. During the financial year 2022-23, the Corporate Parenting Board met five times, and remained a single entity covering the whole county. It was chaired by both councils' elected lead members with cabinet responsibility for children's social care. As of May 2023, the Board has disaggregated, with each council facilitating its own Board.

Aside from its own annual report, during 2022-23 the Board received and scrutinised annual reports from the Independent Reviewing Officer Service, fostering and adoption services, the Virtual School, and the Integrated Care Board. Statutory health assessments remained an issue of intense scrutiny for the Board, but members were somewhat reassured by the remedial actions being undertaken.

Every Board meeting included a scorecard of selected metrics, prompting debate and challenge from Board members. This showed recovery in terms of some key health-related metrics, and continuing strong performance in terms of care leavers in employment, education and training. Ad-hoc and thematic reports to the Board included a detailed presentation around the sufficiency of foster places and the challenges therein; services available for young people leaving care, including disparities in council tax exemption schemes between the two councils; an update on a national safeguarding review for children with disabilities in residential placements; and care-experienced people's contact with the criminal justice system.

Although there is more to do, the Board made sure young people's voices were heard and utilised. A care-experienced young person was recruited to the Board as a full member, and the Board liaised with the Trust's participation groups. In many cases, young people contributed to the reports and presentations which came to Board, particularly the leaving care item. Every Board included a dedicated slot for celebrating the achievements of children and young people, and a very successful celebration event took place in July 2022 with children nominated for awards in four categories.

The Local Government Association diagnostic exercise in March 2023 highlighted many strengths of the Board and areas for opportunities and improvement. The Trust's Young Inspectors team contributed to this valuable process. Key outcomes included the need for greater young people's participation in Board, and a shared vision of corporate parenting among members.

Northamptonshire's improvement journey is captured in the overarching Improvement Plan, which lists aims and activities in six key areas: excellent leadership; recruit, retain and develop an awesome workforce; relationship-based practice; quality assurance and learning; healthy partnerships; and effective use of resources. Key developments include the Valuing Care project, the Sufficiency Strategy and new panels created to promote children's early permanence and transition to independence.

The Trust's Corporate Parenting Strategy includes four aims which we want to achieve for children and young people: live safe, be safe; fulfil potential; develop resilience; and enjoy good health and wellbeing.

1. Governance and Statutory Context

What is corporate parenting?

Local authorities and their partners are responsible for ensuring that care-experienced children and young people are as safe and well cared for as any other child. This responsibility is called 'corporate parenting' and applies equally to children who have entered the UK from overseas and are separated from their families. Corporate parenting duty rests not only with social workers and their managers, but also any other agency that provides services and support to children in care such as health services, housing departments, the police and schools. Corporate parents have specific duties for young people leaving care and making the journey to independence.

Legal background

The collective responsibility for local authorities was first laid out in the Children Act 1989 and the Children (Leaving Care) Act 2000. The central role of councils as effective corporate parents has been emphasised by government in the publications *Care Matters: Time for Change* (DCSF 2007), *Care Matters: Time to Deliver* (DCSF 2008), and consolidated in aspects of the Children and Young Persons Act (2008). Other legislation and statutory guidance that determine our duties include:

- Adoption and Children Act 2002
- Care Leavers (England) Regulations 2010 Children and Adoption Act 2006
- Children and Families Act 2014
- Children and Social Work Act 2017
- Human Rights Act 1998
- The Adoption Agencies Regulations 2005 (as amended by the Adoption and Care Planning (Miscellaneous Amendments) Regulations 2014
- The Children's Homes (England) Regulations 2015
- The Care Planning, Placement and Case Review and Fostering Services (Miscellaneous Amendments) Regulations 2013
- Adoption and Care Planning (Miscellaneous Amendments) Regulations 2014
- The Care Planning and Fostering (Miscellaneous Amendments) (England) Regulations 2015
- Working Together to Safeguard Children 2018
- Borders, Citizenship and Immigration Act 2000

Principles of corporate parenting

The Children and Social Work Act 2017 provided a welcome distillation of corporate parenting responsibilities through seven principles of corporate parenting. Local authorities and their partners are required:

1. To act in the best interests, and promote the physical and mental health and well-being, of those children and young people;
2. To encourage those children and young people to express their views, wishes and feelings;
3. To take into account the views, wishes and feelings of those children and young people;
4. To help those children and young people gain access to, and make the best use of, services provided by the local authority and its relevant partners;
5. To promote high aspirations, and seek to secure the best outcomes, for those children and young people;
6. For those children and young people to be safe, and for stability in their home lives, relationships and education or work; and
7. To prepare those children and young people for adulthood and independent living.

The Act introduced some new responsibilities relating to children in care and care leavers. These include a requirement to publish a 'Local Offer to Care Leavers,' setting out the services available to young people leaving care, extend the provision of personal adviser support to all care leavers up to the age of 25 and to provide education advice and guidance to young people formerly in care. The Act also introduces a number of requirements to ensure that court processes are focussed on long term plans for and specific needs of the child.

The Care Leavers Charter

The Care Leavers' Charter is a set of promises to care leavers, published by the Government in 2012. It is "Designed to raise expectation, aspiration and understanding of what care leavers need and what the government and local authorities should do to be good corporate parents." The Charter will "Remain constant through any changes in legislation, regulation and guidance."

We promise:

- To respect and honour your identity
- To listen to you
- To believe in you

- To inform you
- To be a lifelong champion
- To support you
- To find you a home

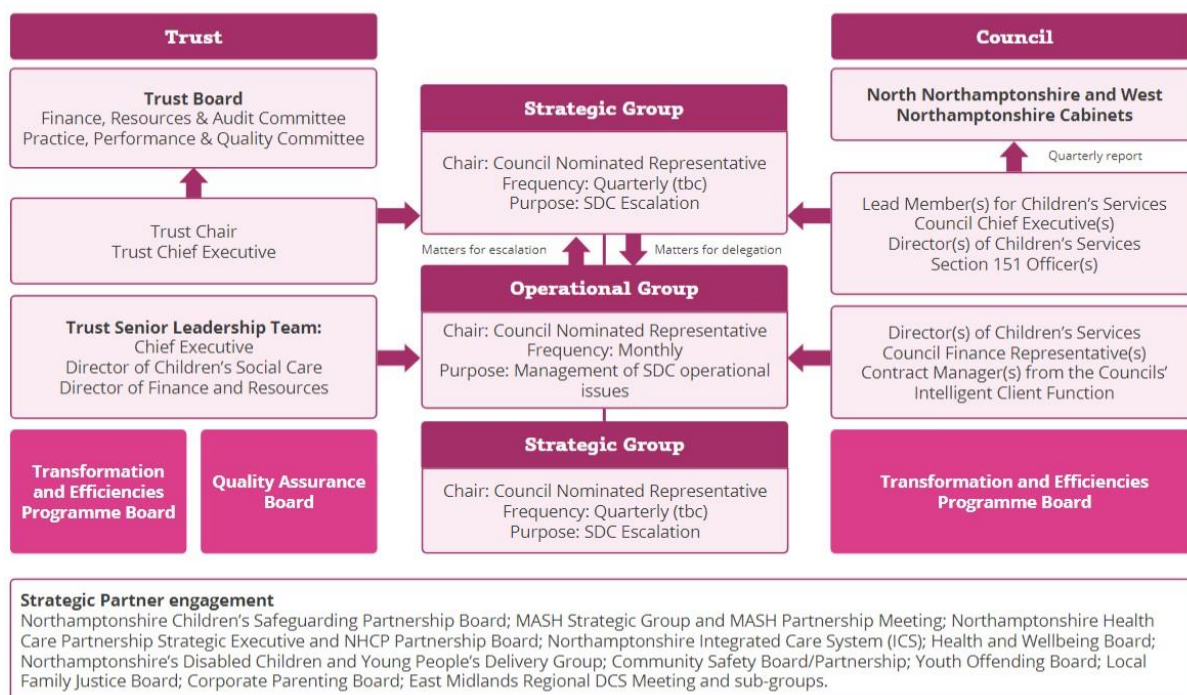
NCT has developed a separate set of promises to care leavers which have been adopted by the Board.

[NCT and the move to unitary authorities](#)

From April 2021 Northamptonshire County Council and seven district and borough councils were replaced by two new councils: North Northamptonshire Council and West Northamptonshire Council. Some services which were delivered by different councils were brought together (aggregated), while others which were delivered by the county council were split (disaggregated).

Northamptonshire Children's Trust was established on the 1st of November 2020 to deliver children's social care across the county. It is owned by West and North Northamptonshire councils but in order to achieve operational independence it has its own board of directors which sets strategic aims for the Trust, oversees its management and holds the executive team to account.

Northamptonshire Children's Trust governance arrangements



The disaggregation of the Corporate Parenting Board, 2023

A decision was taken at the inception of NCT for there to be a single Corporate Parenting Board inclusive of both councils, with shared chairing duties. However, as of May 2023, each council will hold its own Corporate Parenting Board. This decision was geared to allowing each council greater scrutiny and accountability, and ultimately better outcomes, for children and young people under their remit. The decision to disaggregate also reflects Ofsted's requirement for disaggregated data for the two councils.

The Pledge to Children in Care and Care Leavers

The Board's pledge to young people in care and care leavers was drawn up in conjunction with the Children in Care Council and is available to view on the Young Northants and the Trust's websites.

We will help you be physically and emotionally healthy

We will have achieved this when:

- You have the right support for your physical, mental and emotional wellbeing and you do not have to wait too long for it.
- The adults close to you understand your needs.
- You have a good understanding of your health needs and history, when you are in care and when you leave care.

We will make sure you are living in the right place

We will have achieved this when:

- You are living with people who understand you, care for you well and build a positive relationship with you.
- You have a safe and stable home life.
- Where you are living does not affect how well you are looked after.

We will make sure you have great relationships in your life

We will have achieved this when:

- You have regular contact with those who are important to you, as long as it's safe.
- You understand why you are in care and are involved with the plans that affect your life.
- We are warm and courteous towards you, do what we say we will, and respect your culture and identity.
- You have enough quality time with the adults (social worker, personal adviser, teacher, doctor, nurse) who are there to support you, at a time that is convenient to you.
- Changes of social worker or personal adviser are avoided wherever possible. Any changes are explained to you, and you are introduced to the new person properly.

We will make sure you get a good education

We will have achieved this when:

- You are achieving the best you can.
- You have a stable school where you feel safe.
- You feel part of your school community and are able to take part in clubs and activities.
- You have adults who understand your needs and put the right things in place to support them.

We will help you prepare for the future

We will have achieved this when:

- As you become independent, you have a suitable place to live which feels like a proper home.
- You are in education, employment or training, helping you reach your potential.
- You are helped to manage your money effectively and get the right benefits.
- You have access to leisure services and can get around easily.

We will involve you in developing our services and holding us to account

We will have achieved this when:

- We celebrate your successes.
- We actively seek and take account of your views, wishes and feelings to improve our services to you.
- You can access useful and accurate information about services available and the people who can support you.
- You feel able to share complaints compliments and comments about our services.
- There is a range of opportunities for you to get involved to with helping to improve all services to children and young people.

2. Board Activity, 2022-23

Membership and meeting arrangements

During the reporting period, a single Corporate Parenting Board operated in the county, with representation from both councils. It met every two months, aside from July 2022 when the meeting was cancelled to allow focus on the Children in Care Celebration and Awards. Meetings took place both in person and via video link. Cllr Scott Edwards (North) and Cllr Fiona Baker (West) shared chairing duties. As of March 2023, the membership of Board was as follows:

West Northamptonshire members:

Fiona Baker (Chair, Con), Louisa Fowler (Con), James Hill (Con), Stephen Hibbert (Con) Harry Barrett (Lab).

North Northamptonshire members:

Scott Edwards (Chair, Con), Lora Lawman (Con), Macauley Nichol (Con), Gill Mercer (Con) [replaced Cedwien Brown], Leanne Buckingham (Lab) [replaced Zoe McGhee].

Board was also attended by Trust officers and other representatives, including:

- Chief Executive Officer and Director of Children’s Social Care for Northamptonshire Children’s Trust (NCT).
- Directors and Assistant Directors for Children’s Services, West and North Northamptonshire Councils.
- Assistant Director and Strategic Manager for Corporate Parenting, NCT.
- Head of Adoption, Fostering and Children’s Homes, NCT.
- Strategic Manager, Safeguarding and Quality Assurance Service, NCT.
- Principal Social Worker, NCT.
- Head of The Northamptonshire Virtual School.

- Head of the Northamptonshire Youth Offending Service.
- A Children's Trust board member.
- A care-experienced young person.
- Vice Chair, Northamptonshire Foster Carers Association.
- Assistant Director, Housing and Communities, WNC.
- Chief Nursing Officer and Designated Nurse, Northamptonshire Integrated Care Board.
- Corporate Parenting Project Officer (providing administration and other support), NCT.

Other NCT officers and representatives of partner agencies attended as required, on invitation.

Annual reports

While Board is not a statutory body per se, legislation requires that an appropriate oversight body has sight of certain statutory annual reports. Our Board fulfils this function, providing scrutiny and oversight to NCT services. Where possible, reports for Board are summarised for presentation during the meeting, with the full reports being shared a week prior.

The following annual reports were scrutinised by Board during 2022-23. Note, however, that the annual reports related to the year 2021-22 unless otherwise stated.

The Independent Reviewing Officer Service.

Independent Reviewing Officers (IROs) ensure care plans meet the needs of children and young people. They follow up on agreed actions and make sure people do what they say they will do. IROs chair children's statutory annual reviews, and make sure the child's voice is an integral part of the process.

NCT has 16 full-time and 1 part-time IRO, who between them chaired over 3000 children and young people's reviews during 2021-22, compared with just under 3000 the previous year. 87% of initial reviews took place within the statutory timeframe, with this figure rising to 90% for second reviews and 95% for those subsequent. Pleasingly, 92% of children participated in their review in some way, whether through the Mind of My Own children's mobile app, in person, a letter or other means. In many cases, children chaired their own review and chose the meeting location. Every IRO report now includes a letter written directly to the child or young person themselves. Government guidance recommends an IRO caseload of between 50 and 70. Our average caseload was 74 for the reporting period, reflecting the increasing children in care population.

During the year a new care plan format was developed in consultation with young people, which they reported finding easier to follow. The service continues to work closely with CAFCAS and regional IRO forums, to develop good practice and escalate concerns.

Locally, IROs raise formal and informal escalations on individual cases where there could be significant impact for children and young people. Key findings from this process are shared in a

quarterly report to the Quality Assurance Board. Arising themes are addressed in regular service managers' meetings and monthly performance clinics.

Ongoing priorities for the IRO service include ensuring that the voice of children and young people is central to review and care planning processes, and holding monthly meetings with service managers to share concerns and good practice. IROs are being encouraged to fully evidence the direct and indirect contact they have with children and young people and their families.

Corporate Parenting Board Annual Report.

The Board approved its annual report for the year 2021-22.

The Fostering Service.

NCT's Independent Fostering Agency operates on behalf of both councils. The service undertakes many statutory functions concerning foster carers, including assessment and review, approval, supervision, support, and training.

At the end of the reporting period, 72% of children in care lived in a fostering placement, as opposed to residential care or other arrangements. Nationally and locally, recruitment and retention of foster carers remains a huge issue. Around 41% of Northamptonshire children in care live in agency foster care placements as opposed to 'in-house' placements. Finding suitable in-house placements for sibling groups, older children, and those with complex needs remains a challenge. 34 new foster carers were recruited by the end of the year, and although this was 3 less than the previous year, it represented a net gain of 2 households. The percentage of children who lived in the same placement for 2-plus years remained strong, at 66%, indicating that most children are placed in homes that meet their needs. In April 2022 there were 213 approved mainstream in-house fostering households, as well as 122 approved family and friend households.

The service undertakes a wide ranging of marketing activities to recruit new carers, including the use of Google adverts, Facebook campaigns, and web videos. Awareness days throughout the year such as Mother's Day and Hidden Heroes Day were also used to reach a wider audience. Our Christmas advent calendar on social media showed a different reason to foster for each day of the month, as shared by our carers. Through social media, the service shared 'a day in the life of' different roles such as a foster carer, social worker, panel advisor, and foster carers' birth children.

Other developments in the service include streamlining recruitment, assessment and approval processes; improving reporting systems; appointing a new registered manager; holding timely retention meetings with carers who are thinking of leaving; and further development of the resilience carer scheme, for children with complex needs. Staff have undergone secure base attachment and dyadic development training. Our foster carers, meanwhile, now have access to the National Association of Therapeutic Parenting. This provides access to training, webinars and

networks of support with a focus on therapeutic approaches. The service continues to strengthen its links with the Northampton Foster Carers Association, the vice-chair of which attends Board.

Board challenged the service regarding Regulation 24 cases. These are cases in which children are placed with people with whom they already share a connection. Fostering agencies are required to assess these places within a certain period, which can be extended to 24 weeks. The majority of the service's cases are assessed within timescale; if they are not assessed in time, it is often due to delays with medical or background checks. In some cases, it is appropriate for the child to be placed with their connected persons, without those persons being officially approved as foster carers, and the service understands the narrative behind all such cases.

The Adoption Service.

Like the fostering service, the adoption service operates on behalf of both councils. Its remit includes recruiting and assessing prospective adoptive parents; family-finding for children who are being adopted; supporting families both before and after adoption; and helping adults who were adopted to access their records. The service includes the Adoption Panel, which considers approvals for adopters and proposed matches of children with adopters. The service is now part of Family Adoption Links, a Regional Adoption Alliance (RAA). This allows access to a wider range of training and resources, particularly in terms of finding matches for children, while retaining strategic control.

During the reporting year 26 children were matched with and placed with adoptive families. 41 children had a plan for adoption agreed, compared to 29 the previous year, an increase reflecting a recovery from the pandemic period. 26 new adopter households were approved, from 187 initial enquiries. 38 adoption orders were granted by the court. Positively, there were no adoption disruptions (that is, where a placement breaks down before the adoption order is granted) during the reporting year.

As with fostering, recruitment and retention activity includes a wide range of social media campaigning, in-person follow ups to enquiries, a comprehensive training offer, regular support groups and responsive actions taken when families are struggling. The service includes workers who are trained in therapeutic life story work and video interactive guidance. During the reporting period the service also sourced almost £1 million from the national Adoption Support Fund.

Board and the service itself agreed that the service's data collection systems require improvement; better systems will allow more time for practitioners to actively work with families. Other plans for the service include improving the feedback mechanisms for children and families, launching a new staff training plan and implementing the RAA's core training offer for adopters.

The Virtual School.

The Virtual School (VS) is a statutory body which promotes the educational attainment of children in care. This involves monitoring and improving the timeliness and quality of Personal Educational Plans (PEPs); monitoring children's progress, attendance and exclusions; and devolving the centrally funded money set aside for the education of children in care. For the first time, the VS presented to Board separate reports for the North and West authorities. The reporting period was for the 2021-22 academic year. During that time, the VS quality assured 1083 PEPs for statutory school-age children for the North, and 1313 for the West, reflecting the children in care population size for each area. For both authorities, just under 80% of PEPs were rated Good, a substantial improvement from 64% (North) and 65% (West) in the previous academic year.

The VS continued its school holiday activity programme, with 139 children taking part in events, and delivered a wide range of training to school governors, teachers, carers, parents and guardians. After an update to legislation, the VS now also delivers advice and guidance to previously looked after children.

Priorities for the VS include improving the quality and timeliness of the bespoke early years and post-16 PEPs; supporting schools around new exclusions guidance; and helping services ensure they discharge their duties to children with Special Education Needs and Disabilities. The VS is also exploring the potential widening of its remit to include any children with a social worker.

Board challenged the VS regarding figures around fixed term exclusions for pupils, but acknowledged that the team proactively works with schools to explore alternative options. When appropriate the NCT Chief Executive has worked with council directors to avoid permanent exclusions for children in care.

The Integrated Care Board and the Health of Looked After Children.

Northamptonshire's Integrated Care Board (ICB) reported to the Board on how it had met its statutory responsibilities for children in care. While they may of course have similar health needs to their peers, children in care often have more acute needs because of a history of neglect and abuse. This is particularly the case for children from overseas who are separated from their families; the ICB carries out specific programmes for these children, such as screening for blood-borne diseases.

Performance around statutory health assessments for children in care has been a protracted issue in Northamptonshire and nationally, particularly the timeliness of initial health assessments when a child first enters the care system. This issue was raised at most Board meetings through the year, with members providing robust scrutiny. Challenges have included the availability of paediatricians, and the difficulty of assessing children with complex needs placed out of county. Remedial actions taken to improve this picture include detailed mapping and analysis of health assessment procedures and extra staffing to address a backlog of review assessments. Board was reassured that as of December 2022, the proportion of initial assessments taking place on time had risen to around

84%. It should be noted that while too many children's health assessments are late, any child with a known health issue is prioritised and receives a timely assessment and follow-up care. Board's ICB representative is also part of a regional group which intends to lobby central government to effect changes which would help local authorities and their health partners meet their statutory obligations.

Evidencing that children in care undergo a timely dental check has also been an ongoing challenge, not least due to issues with recording the checks when they happen. This picture has improved somewhat at the time of writing, however, and all accommodation providers have been asked to provide dental check details for all children in their care. Carers have also been provided with a letter to show to dentists, highlighting that children in care should be treated as a priority.

Northamptonshire's specialist Looked After Children's Mental Health Team continues to provide vital care and guidance; nearly 300 children were open to the service in 2022. Through a Public Health project, the team has now recruited an advanced mental health specialist to work in the Trust's Leaving Care Team. Ongoing priorities for the ICB include further improving the timeliness of health assessments, undertaking a review to understand the needs of separated children and improving data-sharing practices with the Trust. The Strengths and Difficulty Questionnaire (SDQ) is a short behavioural and emotional screening questionnaire, which aims to provide information about a child's wellbeing. There have been challenges with the SDQ pathway in Northamptonshire and work has been undertaken with key partners to develop a new pathway and improve the SDQ process.

Performance scorecard

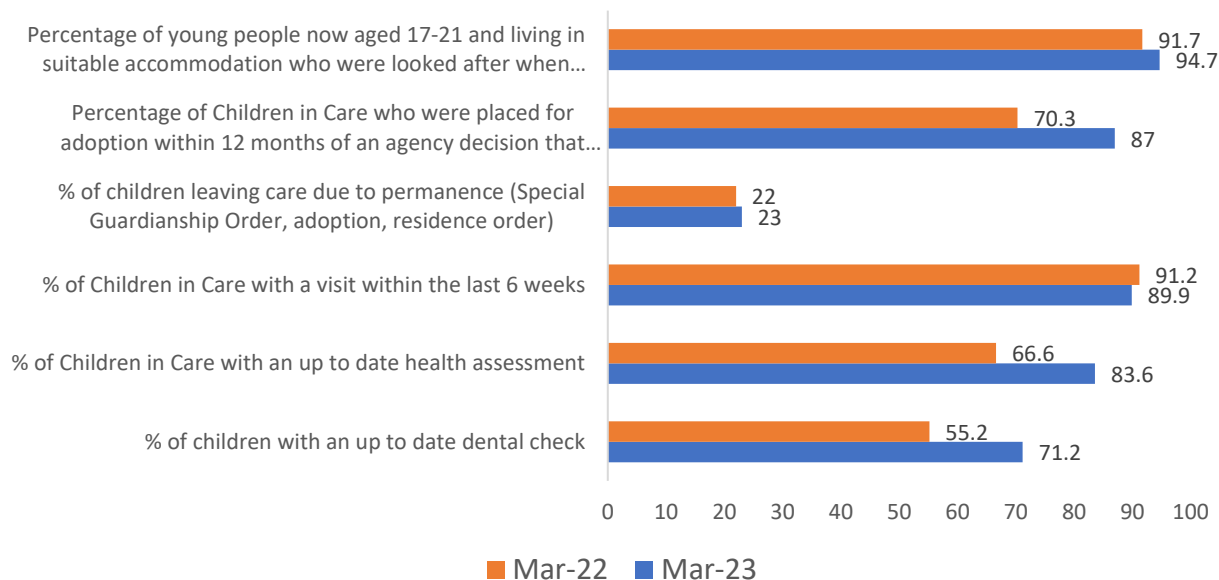
The Board reviews a performance scorecard at each meeting, providing an opportunity for dialogue, scrutiny and challenge between officers, partner agencies and elected members. Measures include some of the national metrics required by the DfE and the scorecard relates closely to the Trust's Improvement Plan. Measures are grouped under the following headings:

- General measures (such as population data, timeliness of statutory visits).
- Placements (proportion of children living out of county, placement stability measures).
- Adoption (timeliness of placements, number of orders granted).
- Care Leavers (accommodation, employment and training measures).
- Education (education plan timeliness and quality, exclusions).

Discussions focussed heavily on health assessment performance, with a specific agenda item on this topic coming to Board in January. However, the scorecard has been used throughout the year as a starting point for scrutiny of the Trust's and its partners' performance in many areas.

Often, this scrutiny has furthered members’ understanding of a child’s journey through care. For example, while scorecard averages may suggest that children wait too long to be adopted after an adoption order is made by the courts, this may disguise a very positive journey for individual children towards being adopted by a family that is perfect for them.

Performance Scorecard: Selected Mar 2022/Mar 2023 comparison data.



Thematic and ad-hoc reports

At every meeting, the Board focusses on a particular topic of relevance to care-experienced children and young people, informed by the NCT’s priorities and Improvement Plan, and feedback from young people themselves. Young people, NCT officers and partner agencies are often invited to contribute. Items may also be added to future agendas as a result of discussions held in Board.

The following provides a summary of the topics discussed at Board during the year.

Sufficiency update.

In recent years the population of children in care has risen markedly, placing a strain on the sufficiency of foster care placements across the country. The needs of children have also become increasingly complex, requiring carers with the specialist skills needed to meet such children’s needs. While they have reduced consistently over the last five years, the number of crisis and emergency placement requests remains a challenge.

In Northamptonshire, a high proportion of residential and fostering placements are provided by third party agencies such as Independent Fostering Agencies, which are Ofsted regulated. For older young people, Independent Supported Accommodation providers are often a very beneficial step on the

journey to independence. These providers are not regulated by Ofsted, but are required to abide by the Trust's framework agreement and will soon be required to abide by a national set of standards.

The Trust undertakes a range of activity to ensure that third party providers are meeting the needs of children in their care. This includes block-purchasing agreements, quality assurance visits and provider events. Around a quarter of our children in care live in placements outside the county.

While this can be due to a lack of an available placement in-county, it is often the most appropriate solution for the child's needs.

The Sufficiency Action Plan is geared to improving our sufficiency of homes for children in care. The plan includes commissioning two new emergency children's homes, a review of the leaving care accommodation offer, exploring new block placement contracts and working closely with partners to overcome challenges in the sufficiency market. An external review of our placement service found that we have a good understanding of our challenges, but there is much work to do.

The Placement Management Service receives many same-day placement requests, coming in peaks and troughs. Sometimes these cannot be fulfilled in-house, so the young person may move to an unregulated setting, which are subject to close managerial scrutiny. Such requests may be due to placement breakdowns and so encouraging placement stability has been a strong area of focus. Wrap-around support within the community can promote placement stability, an area for which elected councillors are in a unique position to help.

Board was also challenged to consider and drive the means of reducing the need for a such a high level of placement sufficiency in the first place. This would effectively mean reducing the number of children who are in care unnecessarily. This will be achieved through strengthened early help for families, high quality social work and edge of care services.

Services for Young People Leaving Care.

The Leaving Care Team, with the help of some enthusiastic (and somewhat raucous) care-experienced young people, shared with the Board activities in four areas: the Local Offer to Care Leavers, council tax exemptions, the new Accommodation Panel and the Independent Living Programme.

The Local Offer is a publication which sets out the services available to children moving from care to independence, including services available from partner agencies. The offer includes the provisions required by statute, such as a £2000 setting up home allowance. Northamptonshire young people also have access to a mental health professional within the Leaving Care Service, free halls of residence accommodation through the University of Northampton, council tax exemptions, and drop-in clinics with partner organisations such as housing services.

Consulting with young people themselves is a vital part of developing the offer, and young people have told us what they would like to see, such as improved access to leisure services and travel discounts. Young people spoke very positively about the support they receive from their personal adviser. At the time of Board an event was being planned to bring together national and local businesses, to challenge them to offer employment and other opportunities for our young people. The Leaving Care Team is now working to exploit the wide range of opportunities resulting from the successful event.

The Trust employs two care-experienced Apprentice Champions in the Leaving Care Service. They spoke powerfully about council tax exemptions for care leavers, and how the exemptions currently offered by the west and north councils vary, creating something of a 'postcode lottery.' Elected members themselves were challenged to take the issue up with their respective councils.

A new multi-agency panel has been set up which considers, on an individual basis, the accommodation and other needs of young people transitioning to independence. Housing services, adult social services and Prospects (a service which helps young people into work and training) are regular members, and the panel considers around twenty cases a month. This can include young people referred to the panel due to specific concerns. Typical actions resulting from the panel include helping remove barriers to housing applications being made, expediting referrals to adult services, and offering practical advice to personal advisers and social workers.

The Independent Living Programme runs over four days and helps young people gain the skills they need for moving on to independence. Board held a live question and answer session with a group of young people who had attended the programme. They had learnt a lot about topics such as budgeting, cooking, substance misuse and sexual health. While they feared the programme would rather drag, it was in the event very enjoyable, with some participants overcoming their shyness and making new friends. One young person was excited because the course had facilitated and prepared her for moving into a training flat. When asked what advice they would give other young people thinking of doing the course, they said 'Just do it, it's fun!'

National Safeguarding Review: Children with Disabilities.

In October 2022 the DfE's Child Safeguarding Practice Review Panel published a review into very serious abuse to a number of children with disabilities and complex needs at three residential special schools in Doncaster. The panel chair wrote to all Directors of Children's Services in England requesting that reviews were undertaken in respect of disabled children living in residential settings. The Trust completed the review and reported its findings to Board.

The Trust identified five such children and undertook extensive work to look at their arrangements and needs. This entailed liaising with parents, social workers and commissioners, and understanding the voice of the children themselves. The report to Board confirmed that in each case, arrangements

were as they should be, although capturing data around Educational and Health Care plans and using it effectively was identified as an area for development. The process also involved looking at each of the establishments and ensuring there were no concerns or required actions; again, the outcome was satisfactory.

As well as the Corporate Parenting Board and the Local Safeguarding Partnership, the results of the process were submitted to the national panel overseeing the review, and to the regional DfE. The Trust has chosen to repeat the exercise every six months.

Care-experienced people and youth justice.

Colleagues from Northamptonshire's Youth Offending Service (YOS) presented a detailed report to Board about care-experienced young people's involvement in the youth justice system, prompting lively debate among members.

Between June 2022 and January 2023, the proportion of YOS cases who were care-experienced rose from 15% to 16.3%. The proportion of first-time offenders who were care-experienced had fallen, due in part to the relatively new multi-agency Protocol for Reducing the Criminalisation of Children in Care and Care Leavers. However, the dip seen in reoffending rates for older teenagers was unfortunately not reflected among care-experienced young people.

There was no strong correlation between living in a residential setting and offending; young people who offend come from a variety of placement types, but notably, repeat offenders who are care-experienced have often undergone multiple changes of placement. A late entry to care is also a factor. Unsurprisingly, offending rates were closely aligned with deprived areas.

The YOS liaises closely with the courts, social workers and residential homes, to give guidance on how to communicate with young people. This involves understanding behavioural triggers and levels of risk, and management plans for dealing with incidents. Many offending young people from residential homes have been the victim of some form of exploitation; they are often faced with weighing the perceived risks from both the law, and criminal gangs. Often, they are more concerned with the wellbeing of their family than their own. A multi-agency approach is vital if these risks are to be mitigated.

A new multi-agency Out of Court Disposal Panel has been created. This means that for every young person who comes to YOS with some form of criminal outcome, a decision is made as to whether an out of court disposal is feasible. The new Turnaround project is also in place and helping to share responsibility for these young people more evenly across agencies. As a result, there are more Outcomes 22s, which is when the police decide to defer prosecution to allow an opportunity for the accused to engage with intervention activity.

3. Young People's Participation and Successes

Officers and elected members try hard to include young people in the Board's functioning, whether by inviting them to attend in person or provide materials such as videos or artwork. Materials prepared for the Board are written in a young person-friendly format wherever possible. The Board liaises closely with the participation groups: the Children in Care Council, the Care Leavers' Council, and the Shooting Stars group for young people with special educational needs or disabilities. Children and Young people's contribution is evidenced in many of the reports and presentations which come to Board, the IRO Annual Report for example, which includes feedback from young people and a special version of the report written directly to them.

While there is work to do, young people contributed significantly to the Board during 2022-23. One particularly welcome development was the recruitment of a care-experienced young person as a full member. As detailed above, young people presented their views to the Board about the benefits of the Independent Living Programme, issues around council tax exemptions, and their hopes for the Local Offer to Care Leavers.

Celebrating children and young people

Like any good parent, the Corporate Parenting Board celebrates the achievements of children. Every meeting includes a slot in which anonymised stories of children and young people's successes are shared, and all receive a certificate and shopping voucher in recognition. These achievements have included high-level accomplishments such as having written work published or securing first class degrees. But the Board also celebrates those ostensibly small steps, which add up to significant progress. This has included achievements as simple as being able to attend school regularly or engage with a social worker.

After a pandemic-induced hiatus, the Awards and Celebration Event for Children in Care returned in a big way in July 2022 and was a roaring success.



Over 400 nominations were received for children in four categories: Determined to Learn, Making a Difference, Aspirational Star, and Super Skills. Every nominee received a letter and certificate, personally signed by the Trust CEO Colin Foster. The event was held at Fernie Fields Sports Field in Moulton, Northampton, and was well-attended by children, foster carers and family members. Ample support was provided by a small army of volunteers, including members of our fantastic young people's participation groups who created a fantastic balloon arch. Both lead members from Board attended and were delighted to meet so many of our amazing children and young people. As well as the awards ceremony itself, events included a climbing wall, animal experience, live DJ, archery, football and a chill-out tent.



4. Corporate Parenting Board Diagnostic

A Local Government Association (LGA) team carried out a diagnostic exercise between 14th and 16th of March 2023, and fed its findings back to the Board in the same month. The LGA took the role of ‘critical friend’ and met with many of the members and officers who attend Board. The diagnostic considered the following themes:

- Governance and Board effectiveness.
- Appreciation of impact, including data and performance.
- The voice and influence of care-experienced children and young people.
- Ownership by the councils and the Trust.
- Health and wellbeing of children in care and care leavers.
- Aspiration and achievement.
- Quality, planning stability and permanence (sufficiency).

Additionally, the team considered the effectiveness of the current Board arrangements in improving outcomes for children and young people, and how best to deliver the Board’s functions in the future. The Trust’s Young Inspectors team was heavily involved, and interviewed the lead members and service managers in the corporate parenting service. In their feedback, they said they would like more young people on the Board, and a stronger method by which the Board hears and understands the voices of young children. Members should be more experienced at working with children, the Young Inspectors said, and the celebration of young people’s achievements should be expanded. They also felt that documents for Board should be more accessible.

What follows are highlights from the LGA team’s feedback to the board.

Strengths

Trust officers demonstrated a strong commitment to an effective Board, and aspirations for children and young people. Both lead members were similarly committed, and other members had shown a desire to challenge the Trust for the benefit of children and young people. There existed a strong partnership with health colleagues and a commitment to make improvements in that area, and as a general point, the Virtual School was highlighted as a strength. Documents presented to the Board were of good quality and the Terms of Reference were clear. The team welcomed the celebration of young people’s successes at every Board meeting, although this could include more of the ‘small steps’ type of progress that are very important to children.

Areas for consideration and opportunities

The diagnostic concluded that the diverging ambitions of the west and north councils was an issue to be resolved. The team also could not firmly evidence that all members of the board had a sound understanding of the meaning of being an effective corporate parent. Mirroring the view of the

Young Inspectors, the team noted room for much greater participation and engagement with children and young people themselves, as well as foster carers and third-party organisations. Opportunities to learn from organisations such as the LGA should be taken. Similarly, there was the opportunity for closer links with other board structures, such as the Joint Commissioning Board.

Risks

A desire for structural changes could, the team concluded, take energy away from focussing on children's outcomes; while bringing benefits, separate boards could increase the resource burden on Trust officers and other partner members. As young people themselves have noted, the two councils have increasingly divergent offers for care-experienced young people, for example in housing and council tax. Some members have demonstrated a lack of commitment to the Board through their poor attendance of meetings.

What next?

The LGA team suggested that the Board would benefit from its members being united in terms of their understanding of corporate parenting. LGA workshops could help in this regard, as could an understanding of how to use data effectively. The overall governance of the Board needed to be strengthened; regional groups and other authorities' boards could prove instructive. Notably, the LGA suggested that members should actively engage with children and young people outside of the meeting arena, to better understand their journey and experiences.

The Board welcomed the findings of the diagnostic, and agreed it was a valuable exercise. As noted earlier, both councils have since agreed to set up their own individual boards, to be facilitated by their respective democratic services teams.

5. NCT's Improvement Plan: Progress

Northamptonshire Children's Services had its standard Ofsted ILACS inspection in September and October 2022 and are now rated as 'Requires Improvement to be Good'. The journey to improve outcomes for children, young people and families in Northamptonshire is captured in the ongoing Improvement Plan. The following highlights some developments, as of May 2023, most relevant to children in care, under the headings of the Plan's six overarching priorities. Details of 'what good looks like' is listed under each priority.

1. Excellent leadership

Children's experiences and outcomes are improved as a result of consistently good quality management oversight and supervision. Sufficient resources are allocated and managed to enable effective delivery of NCT services.

Performance clinics within the corporate parenting service now have a much greater focus on quality assurance, supervision and oversight. In the last quarter of 2022-23, IROs noted improvements in the management oversight within care plans, case recording and assessments. A new model of performance clinics and quality assurance for Independent Fostering Agencies is now in place. Unregistered foster placements for children in care are now reviewed on a weekly basis by senior managers. Budget forecasts for placements have been reviewed, to reflect local and national pressures. The Trust has also contributed to the DfE consultation around the social care workforce.

2. Recruit, retain and develop an awesome workforce

Children are supported by consistent practitioners who have the capacity and skills to develop effective relationships and undertake good quality work with them. Children and families receive an appropriate response in an emergency out of hours.

Social worker vacancies across the Trust have reduced from 17.1% in 2022 to 16.4% in March 2023. 12 Newly Qualified Social Workers started with the Trust in May 2023, with 13 due to start in September. A case management system for the Trust's fostering service is in the procurement stage. Through the annual social work health check, practitioners have reported that their workload is manageable and that they are well supported.

3. Strong relationship-based practice

Children and families receive the right specialist and timely response that meets their needs and improves their outcomes. Children are well cared for in a permanent and safe home at the earliest opportunity. Care leavers have access to support that meets their needs and improves their outcomes.

With a number of other authorities, the Trust joined the Valuing Care project, supported by Impower. This commenced in February 2023, and seeks to help the Trust get the right resources to children in care who need them. This will promote the Trust's ability to show how we are improving children's life chances, particularly in terms of making sure they have a permanent home and avoid entering care where alternative options are viable. As of May 2023, 78% of Valuing Care assessments had been completed for the identified cohort of children.

As detailed elsewhere in this report, processes around health assessments have been strengthened, with a resulting increase in the number of children receiving a timely assessment. The quality of assessments remains high according to quality assurance checks. Pathways around Strengths and Difficulties Questionnaires (SDQs) are being reviewed and strengthened.

Multi-Disciplinary Team (MDT) meetings have now been embedded in Leaving Care, Children in Care and Disabled Children's Teams, leading to better collaborative working between professionals.

Across the Trust, good and outstanding practice is more routinely seen, shared and celebrated.

The Trust aims to reduce the number of children entering care unnecessarily. To this end, weekly review meetings are taking place with the police regarding children being police-protected, with alternative options being explored. A new Strategic Manager now oversees case progression for children at risk of entering care, and family network meetings are being undertaken more routinely. The average length of court proceedings for children reduced from 67 weeks in June 2022, to 47 in January 2023 and the Valuing Care project identified 27 children who could potentially return to their families' care.

The Trust's Permanence Tracking Panel takes place twice a month (once for each council). On a case-by-case basis, it considers how best to remove barriers to children achieving permanence, whether that means returning to their family, a long-term foster placement or other arrangement. Children in care often need help understanding their past and present, in order to thrive in the future. Their wishes and feelings are expected to be integral to all assessments and ongoing work, and a dynamic model for life story work is being embedded.

As mentioned earlier, exciting developments to the Local Offer to Care Leavers are underway, with increased apprenticeship opportunities, social activities and mentoring. The new Accommodation and Transitions panel operates in close partnership with housing services in each council, adult social services, and Prospects. It considers how best to help young people make a successful transition to independence, while also achieving best value for the Trust. Russell House in Northampton remains a valuable drop-in service for care leavers, and hosts clinics with partner organisations, such as Prospects. There is a need for a similar resource in the north of the county.

4. Insightful quality assurance and learning

Children's outcomes and experiences are improved as a result of improving practice.

IROs are using a thematic approach to escalating concerns around practice. By the latest measure, 50% of their escalations are resolved within one working day, 70% within five working days. Ten children in care teams had no escalations raised in the last quarter of 2022-23. 72% of children who had a statutory looked after child review in March 2023 had a care plan completed within 3 working days prior to the review taking place. This compares to 62% completed when a similar exercise was undertaken in June 2022.

5. Healthy Partnerships that improve outcomes for children

Risks for children who are experiencing contextual vulnerabilities are effectively managed and the impact on them is minimised. Children and Families in need of additional help receive the right support at the right time which makes a difference to their lives. Children with additional and complex needs receive the right support at the right time which makes a difference to their lives. Children in care and care leavers reach their potential in terms of educational attainment.

Better early help for families means better outcomes for children, and a reduced likelihood of entering the care system. A new Early Help Strategy is in development, with a focus on partnerships and practice. North Northamptonshire is in the process of commissioning the Early Parenting Pilot, through localised family hubs.

A number of developments are underway to help children in care and care leavers achieve their educational potential. The Virtual School continues to quality assure every Personal Education Plan, and meets quarterly with strategic leads in education and social care. A new tracking system to monitor children's educational progress has been developed.

As of May, 64.4% of Northamptonshire care leavers are in some form of educational, employment or training. While the Trust aims to drive this figure further upward, it is already consistently above the national care leaver average. Two paid work experience positions have been secured through the Valuing Care project, and a host of similar opportunities have opened up through the engagement event with local businesses, hosted by the Trust. Care-experience is not a 'protected characteristic'

under UK equality law (there is an argument that it should be), but regardless, the Trust and the two councils now have a ring-fenced interview process in place for care leavers applying for jobs.

6. Effective use of resources

NCT commissioning and performance management has the best possible impact on outcomes for children. Children in care are cared for in a home which meets their needs and improves their outcomes. Older teenagers receive the right support and accommodation to meet their needs and help transition into adulthood.

Recommendations from an external review of the Trust's commissioning, quality assurance, performance management and assurance arrangements are being considered. This will be critical in improving outcomes for children and young people, as well as value for money for the Trust.

The Sufficiency Strategy and Action Plan is helping to improve short term placement stability, measured by determining the proportion of children three or more placement moves in a rolling twelve-month period; this figure decreased from 11.9% in October 2022, to 11% in January 2023. Unregistered placements are closely monitored and have reduced from 27 in September 2022 to 22 in April 2023.

New processes are in place to promote the retention of our foster carers, with retention meetings taking place at the earliest opportunity when foster carers raise concerns, and the continued promotion of the resilience carer scheme. Through the Circle to Success project, engagement work is taking place with external Independent Foster Agencies and providers of Independent Supported Accommodation and residential provision. This remains in its early stages but has led to new recruitment initiatives for foster places for children with disabilities.

A new residential home for children with complex needs has partially opened, with another due to open soon. Similarly to our provision at Belinda Ferrison House in Northampton, a new YMCA-run suite of training flats is due to open in summer 2023.

As detailed elsewhere in this report, the new Accommodation and Transitions Panel is helping professionals to coordinate support for young people moving towards independence. An action plan for 16 and 17-year-olds at risk of homelessness is now in place.

Appendix 1: Four Priorities

The NCT Corporate Parenting Strategy 2021-25 sets out four key priorities. This appendix sets out progress against the specific criteria under each priority.

Priority 1: Live safe, be safe

Key service areas and strategies : Sufficiency Strategy, Fostering and Adoption Recruitment Strategy, Commissioning Strategy

How we achieve this	Key Success Criteria	Progress
<ul style="list-style-type: none"> • We will work with communities, businesses and partner agencies to recruit more foster placements to meet the needs of the looked after children cohort and increase placement choices. • If a child or young person has to move from where they are living, we will involve them in the decision making as much as possible and give them an information profile of the placement they are moving to. • If possible, we will keep our children who are looked after with their brother and sisters when they come into care. • Families and friends are always considered in the planning process and our children are placed with family and friends in instances where it is safe to do so. • We will improve choice and quality of accommodation and support for older young people in care and care leavers. • We will offer support to care leavers moving to independence to maintain tenancies. • We will continue to develop clear service pathways for children at risk of Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM) supported by a multi-agency process. • We will continue to ensure that all children and young people who go missing receive return interviews, a completed risk assessment and 	<ul style="list-style-type: none"> • Increase sufficiency of local placements to increase choice for children in care. • Increase in the number of children in foster placements who turn 18 and stay put in their placement. • Reduction in the number of children in care with 3+ placement moves. • Reduction in the number of children returning to care within one year of previous period of care. • Increase in the number of children in care in longterm placements (fostering). • Percentage of children in care during the year who were placed within 12m of the decision (adoption). • Reduction in number of missing episodes for looked after children and increase in number of independent return home interviews. • Reduction in number of looked after children who are first time entrants to criminal justice system. 	<ul style="list-style-type: none"> • Short term placement stability improved from 11.9% (Oct 2022) to 11% (March 2023). • New emergency / complex needs children’s home partially opened, another due to open June 2023. • 32 young people live in Staying Put arrangements as of June 2023; a new, clearer staying put agreement has been launched. • Between March 2022 and March 2023, the percentage of children with 3 or more placement moves in 12 months dropped from 12.7% to 11%. It dropped further to 10.6% in June 2023. • The proportion of children who enter care within 12 months of a previous care episode dropped from 10% to 6% between March 2022 and March 2023. • For 2022-23, 70.3% of children for whom the agency decision was adoption, were placed for adoption within 12 months of the decision. This is a slight decrease from 72% the previous year, however the latest quarterly figure for this metric is 77.8%. • For children who go missing, 99% of return interviews were completed, although children’s participation in these has reduced from 71% to 62% over the year. • Between January 2021 and June 2022 15% of first entrants to the criminal justice system were children in care. For the period 1st

<p>timely management of identified risks.</p> <ul style="list-style-type: none"> • We will further develop a multiagency response to serious youth violence enabling early identification of young people. 		<p>April to 15th November 2022, this proportion fell to 11.3%.</p>
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Priority 2: Fulfil potential

Key service areas and strategies: Virtual School, SEND Strategy and Transformation Programme, Care Leavers Strategy.

How we achieve this	Key Success Criteria	Progress
<ul style="list-style-type: none"> • Educational needs or requirements of the child will be considered at the outset of any placement. • We will support our children with education, training and employment options to help them achieve the best they can. • Children who need to change schools will be allocated a new school place without delay. • Children with additional needs will be supported to have appropriate provision so they can achieve their potential. • All children will have a Personal Education Plan (PEP). • Young people leaving care will be encouraged and supported with accessing further and higher education and training opportunities including apprenticeships. • We will increase apprenticeships, work experience and training opportunities across the councils, partners and the private sector. 	<ul style="list-style-type: none"> • All looked after children will have an up-to-date PEP supported by daily monitoring calls to each school where a child attends to ensure attendance. • Improvement in educational attainment of children. • Increase in proportion of care leavers in education, employment and training. • Reduction in number of children without a school place. • Increase in care leavers undertaking apprenticeships and other opportunities in the Trust and councils. • EHC Plans for children are reviewed annually and quality assurance demonstrates plans are of good quality. 	<ul style="list-style-type: none"> • Every PEP is quality assured by the Virtual School, with a compliance figure of around 97% to 98% for the two council areas. 79% were rated Good for the secondary school cohort for 2021-22. • At Key Stage 1 in academic year 2021/22, 23% of NNC children care achieved the expected levels in reading, writing and maths. This figure was 10% for WNC children in care. • The Progress 8 score for Key Stage 4 for NNC was -1.41 (-0.11 difference to national figure). For WNC, the figure was -0.78 (+0.52 difference with national figure). • Meaningful year-on-year comparative data around educational attainment are unavailable due to the pandemic. • Around a quarter of the school age children in care have an EHC Plan, and all their PEPs are quality assured by the Virtual School. • Virtual School continues to work closely with schools to reduce exclusions. • Any children not on school roll are supported by the VS to access the right provision for them, including tutoring. • There have been 6 apprenticeships in the Trust over the last 2 years, including our Care-Experienced Apprentice Champions. • The proportion of care leavers in

		<p>education, employment or training remains stable at around 62%, and above national averages.</p> <ul style="list-style-type: none"> • Prospects NEET service holds weekly drop-in sessions for care leavers. • Local Offer event with businesses and partners has led to increased opportunities for care leavers in terms of education, employment and training, including apprenticeships
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Priority 3: Develop resilience

Key service areas and strategies: Reunification Policy, Workforce Development Strategy, Joint Housing Protocol, Participation Strategy.

How we achieve this	Key Success Criteria	Progress
<ul style="list-style-type: none"> • We will help our children to learn about who they are as well as the important events in their lives. • We will make sure all necessary information and paperwork is obtained in a timely way such as passport, birth certificate and national insurance number. • We will promote family time between children, young people and their families in a way that enables them to have positive relationships with the people who are important to them where this is safe. • We will support children to reconnect with family and other trusted adults in a safe and to learn about their family history. • We will work with children and families to ensure there is effective support in place to support and maintain a return home. • We will continue to build positive relationships with our children and never give up on them. • We will ensure children have a variety of means to express any concerns they may have and that these are acted on promptly. 	<ul style="list-style-type: none"> • Increase in children moving out of care and number of children returning home. • Proportion of visits to children in timescale. • Increase in percentage of permanent social workers in the corporate parenting service. • Increased number of children engaging in Children in Care Council and participation events. • Feedback from children and 	<ul style="list-style-type: none"> • Between March 22 and March 23, the proportion of children leaving care due to permanence fell slightly from 22% to 19%. However, the permanence tracking panel is now driving permanence for children at the earliest possible stage. Also note that for some children residential care is the best option until adulthood, and these are not reflected in permanence figures. • Around 84% of children receive a visit within 6 weeks, a dip from 91% the previous year. • Between March and May 2023, social work vacancy figures in the service fell from 16.7% to 15%. • Several hundred children received nominations and awards at large scale celebration events in 2022 and 2023. Feedback from 2022 was used to inform the 2023 event. • 139 children took part in Virtual School holiday activities. • Participation number for the Children in Care Council has remained stable at around 16; the group contributed a great deal to the celebration events. • New feedback mechanisms for children are in place and being developed, including the Mind of My Own app, development of the Trust's websites, a child-friendly complaints process, and the Young Inspectors group. • The Voice of the Child working group regularly feeds back to senior managers and boards.

<ul style="list-style-type: none"> • We will aim to keep changes for our children to a minimum. • We will make certain that we have a robust and active Children in Care Council who are able to influence and shape services. • We will offer support to care leavers moving to independence to maintain tenancies. 	<p>young people.</p>	<ul style="list-style-type: none"> • As of June 2023, the Mind of My Own app is being relaunched with new features, including the ability for workers to respond to children directly through the app. • Care leavers continue to receive support in maintaining tenancies via the joint protocol with housing services, which includes regular meetings with housing services, and the Accommodation and Transitions Panel.
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Priority 4: Enjoy good health and wellbeing

Key service areas and strategies: Integrated Care System, CCG Health of Looked After Children

Strategy

How we achieve this	Key Success Criteria	Progress
<ul style="list-style-type: none"> • Children receive appropriate, dedicated services within agreed timescales including access to health assessments, dental appointments and emotional health and wellbeing services. • We will give access to appropriate emotional and mental health support for looked after children when they need it. • We will support care leavers to achieve positive mental wellbeing and emotional resilience. • Children with complex needs and disabilities will have access to integrated services. • We will make sure our children who are looked after can access their health records and history. • We will develop support offers to foster carers including access to Children and Adolescent Mental Health Services (CAMHS). • We will help our children do the things that are important to them in terms of culture and religion. • Children will enjoy a smooth transition between children's services and adult social care. 	<ul style="list-style-type: none"> • Children and young people identify themselves as health and happy. • % of children in care with Strengths and Difficulties (SDQ) scores. • Proportion of care leavers provided with a health passport. • Reduction of care-experienced young people who are street homeless or involved in offending behaviour. • Increased placement stability performance. • Number of children referred to MIAP aged 16. 	<ul style="list-style-type: none"> • High-level oversight and scrutiny continues in respect of Health Assessments. Figures for initial assessments continue to fluctuate; 87% in December 2022, falling to 43% in March 2023. Review assessment figures remain stable around 67%, a rise from the 2021/22 average of 62%. • There have been challenges with the SDQ pathway in Northamptonshire and work has been undertaken with key partners to develop a new pathway and improve the SDQ process. • All children are provided a health passport at their final statutory review. They are also directed to the NHS mobile app. • Between June 2022 and January 2023, the proportion of YOS cases who were care-experienced rose from 15% to 16.3%. The proportion of first-time offenders who were care-experienced had fallen, due in part to the relatively new multi-agency Protocol for Reducing the Criminalisation of Children in Care and Care Leavers. • All young people at risk of homelessness are closely scrutinised at senior manager level. For a snapshot of June 29th 2023, there was one young person classified as No Fixed Abode, with 10 sofa surfing. • Between March 2022 and March 2023, the percentage of children with 3 or more placement moves in 12 months dropped from 12.7% to 11%. It dropped further to 10.6% in June 2023. • The Leaving Care Service now has a dedicated mental health specialist working in the team.

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

14 November 2023

**Cabinet Member for Climate, Transport, Highways and Waste Services:
Councillor Phil Larratt**

Report Title	Resources and Waste Strategy for West Northamptonshire
Report Author	Fiona Unett, Assistant Director Waste fiona.unett@westnorthants.gov.uk

List of Approvers

Monitoring Officer	Catherine Whitehead	26/10/2023
Chief Finance Officer (S.151)	Martin Henry	26/10/2023
Executive Director Place, Economy and Environment	Stuart Timmiss	26/10/2023
Communications Lead/Head of Communications	Becky Hutson	26/10/2023

List of Appendices

Appendix A – Resources and Waste Strategy

Appendix B – Resources and Waste Strategy Consultation – Summary and Key Findings

1. Purpose of Report

1.1. The purpose of the report is to:

- 1.1.1. secure agreement of the new Resources and Waste Strategy for West Northamptonshire, and
- 1.1.2. to note the associated action plan which will facilitate the implementation of the Strategy.

2. Executive Summary

- 2.1 A Resources and Waste Strategy for West Northamptonshire has been developed. The Strategy is a set of 10 principles, which will be used to guide the development of the Council's waste services over the next 15 years.
- 2.2 The purpose of the Strategy is to provide a sustainable vision for waste services and street cleansing services, to inform decision making related to them. The result will see services becoming harmonised over the West Northamptonshire area as current arrangements end, and to provide a sustainable vision for waste and recycling services.
- 2.3 By prioritising waste reduction, reuse and recycling, the environmental impact of waste can be minimised. The increased emphasis on education and awareness will empower West Northamptonshire's residents to be 'responsible consumers' helping the Council to achieve its recycling targets and reduce the cost of waste services.
- 2.4 Improving street cleansing services by working with partners, also forms part of the Strategy.
- 2.5 It is recognised that waste and street cleansing services should also be efficient and value for money and these are included as principles within the Strategy, alongside investing in waste infrastructure, where there is a business case to do so.
- 2.6 The Strategy will be implemented through the actions set out in the action plan, with progress monitored annually and the action plan reviewed and updated.
- 2.7 The development of the Strategy and associated action plan has been steered by a Waste Members Working Group, developed with independent advice from technical experts and it has been informed and tailored by considering more than 3000 responses to a public consultation.
- 2.8 The Strategy aligns with our communities' priorities and West Northamptonshire's values and other strategies. For example, it will help the Council to achieve its sustainability and anti-poverty strategies.

3. Recommendations

- 3.1 It is recommended that Cabinet approve the Resources and Waste Strategy.

4. Reason for Recommendations

- 4.1 It is essential for the Council to have a 'vision for waste services' which will ensure that as existing arrangements for West Northamptonshire's waste and street cleansing expire, the new arrangements are consistent with the vision. The Strategy will provide a set of principles to guide decisions regarding replacement arrangements which will help facilitate sustainable and efficient waste services.

5. Report Background

- 5.1 Under the Environmental Protection Act 1990, the Council has a variety of statutory duties related to the collection and disposal of waste and recycling and also street cleansing, including to:
- 5.1.1 collect waste and recycling from households; and
 - 5.1.2 arrange for the disposal of municipal waste collected in its area; and
 - 5.1.3 arrange for places to be provided for residents to deposit their household waste; and
 - 5.1.4 keep relevant land clear of litter and refuse as far as practicable.
- 5.2 Under the structural change order, West Northamptonshire Council (WNC) inherited a number of contracts from the predecessor authorities, which enable the Council's statutory duties to be fulfilled. These contracts expire on different dates (up to June 2028) and replacement arrangements must be made.
- 5.3 Since vesting day, contracts which have expired have generally been replaced on a like for like basis, taking advantage of economies of scale where arrangements in more than one of the geographic areas is also due to end. For example, a new contract for the processing of Dry Mixed Recyclables is being procured for the material collected in the Daventry and South areas, combining what was previously two separate contracts.
- 5.4 Some of the Council's waste contracts make arrangements for the treatment of waste and recyclables 'behind the scenes' and residents do not use them directly. However, West Northamptonshire residents interact directly with other arrangements, such as the Household Waste Recycling Centre (HWRC) services, or the kerbside waste collection arrangements. It is important that these waste services align over time so that eventually the residents of West Northamptonshire receive and have access to equivalent, or harmonised services.
- 5.5 In order to achieve consistent, harmonised and sustainable services, it is essential for the Council to have a 'vision' for waste services, which will also help the Council achieve its ambitions and objectives set out in separate strategies. For example, waste services have a role in helping the Council become more sustainable, enable residents to live their best lives by having clean and green space, and contribute towards delivery of the anti-poverty strategy.

Resources and Waste Strategy

- 5.6 To provide the Council with a 'vision' for waste services, a Resources and Waste Strategy has been developed over the past year, in association with a Waste Members Working Group and independent consultants (Appendix A).
- 5.7 The Strategy is a set of 10 principles, which will be used to guide the development of waste services in West Northamptonshire as they evolve and harmonise, and to ensure waste services are delivered in accordance with the wider ambitions and objectives of the Council.
- 5.8 The 10 principles, which are described in more detail within the Strategy are:
- 5.8.1 To provide appropriate, harmonised waste services;
 - 5.8.2 To move waste up the waste hierarchy;
 - 5.8.3 To support local prevention initiatives and increase waste education;

- 5.8.4 To deliver high performing services, recycle more and achieve other targets (section 5);
 - 5.8.5 To ensure waste services are value for money;
 - 5.8.6 To invest in West Northamptonshire's waste infrastructure to support performance and value for money;
 - 5.8.7 To consider future changes when designing services;
 - 5.8.8 To work with partners to improve street cleansing;
 - 5.8.9 To consider carbon emissions and sustainability in our decisions regarding waste services;
 - 5.8.10 To align waste services with West Northamptonshire's wider values and strategies.
- 5.9 As noted earlier, there is a general principle to harmonise waste services across West Northamptonshire. The principles also prioritise waste reduction, reuse, and recycling, so that the environmental impact of waste can be minimised. An increased emphasis on education and awareness will empower West Northamptonshire's residents to be 'responsible consumers' and 'waste champions', helping the Council to achieve its recycling and waste reduction targets and reduce the cost of waste services.
- 5.10 The Council's contracts to treat recyclable materials and residual waste that have been collected will also be informed by the 10 principles. For example, maximising the treatment of waste that can't be recycled by ensuring that energy is recovered will be included in contract specifications. Value for money will be achieved by awarding contracts via competitive procurements and also by awarding contracts for the whole West Northamptonshire geographic area.
- 5.11 Investing in infrastructure, where there is a business case to do so, will support improved performance and value for money and the principles also 'build in' flexibility to allow for future changes in legislation or improvements in technology. By looking wider than waste services alone, the Council can work with partners to improve street cleansing, reduce carbon emissions and enable infrastructure development to help deliver the Council's wider objectives.
- 5.12 The Strategy includes an action plan which includes projects that will implement various aspects of the Strategy. Any proposals to make significant changes to service delivery will be the subject of future consultations with formal decisions taken by Cabinet where required.
- 5.13 A public consultation to gather residents and stakeholder's opinions on the vision for waste management in West Northamptonshire has been completed and the results have been analysed and taken into account in the development of the Strategy (Appendix B). Generally, respondents supported the vision and 10 principles that were proposed.
- 5.14 The Strategy, with its 10 principles, provides a flexible approach to guide West Northamptonshire's waste services over the next 15 years and can take account of factors that are outside of the Council's direct control, such as legislation changes.

Procurement of Contracts for the Treatment of Residual Waste and Household Waste Recycling Centre Services

- 5.15 At its October meeting, Cabinet were asked to consider proposals to commence procurement of replacement contracts for the treatment of residual waste and for HWRC services in advance of agreeing the Strategy, because of the long procurement timescales required for these contracts.
- 5.16 The existing contractual arrangements which enable the Council to fulfil its duties to treat and dispose of residual waste, to provide Household Waste Recycling Centre services, and to bulk dry mixed recyclables collected in the South area are due to end 31 March 2025. Therefore, to ensure continuity of waste services, it was necessary to seek authority to secure new arrangements, otherwise there was an increased risk that the Council will not have the necessary arrangements prior to the end of existing contracts.
- 5.17 The Waste Members Working Group will continue to be involved in the development of the specification for the proposed contracts, which will ensure that the contract specifications align with the principles of the Resources and Waste Strategy.

6. Issues and Choices

- 6.1 The Council could have decided not to develop a Resources and Waste Strategy at this time, especially given the continued uncertainty about national requirements for waste services. However, without the Strategy, the Council may not have been able to take consistent decisions about replacement arrangements as current contracts expire.
- 6.2 The Council may have decided to take a different approach to developing the Resources and Waste Strategy, and attempted to include solutions for all waste related issues within the document. For example, whether the waste fleet of vehicles should switch to an alternate fuel, or whether 3 weekly collections should be implemented across West Northamptonshire. However, taking this approach would have taken much longer to develop the Strategy, which is required as soon as possible to inform decisions about replacement arrangements.
- 6.3 The approach that has been taken, to develop a vision for waste services and a set of 10 principles allows the Council to make service decisions about, which will help implement the vision in a gradual way as existing arrangements end. As noted earlier, where significant changes are proposed, these will be the subject of a separate Cabinet paper.

Equalities Impact Assessment Screening Form

- 6.4 An equalities impact assessment screening form has been completed. The screening assessment has identified a neutral impact for the majority of protected characteristic groups.
- 6.5 There will be a positive impact on the environment and residents with lower income, because the Strategy includes additional emphasis on waste prevention activities, such as:
- the recovery of items suitable for reuse and resale, and
 - the reduction of food waste.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The purpose of the Strategy is to provide a vision and a set of principles to guide the development of waste services and these include to ensure waste services are efficient and value for money.

7.1.2 The majority of the financial implications associated with implementing the Strategy will become clear as new arrangements are secured, which may result in lower costs for some aspects of the service, due to greater economies of scale working across the whole of West Northamptonshire.

7.1.3 The action plan includes a set of proposals and projects, some of which will require funding to implement. Some of the projects, particularly those with an objective to minimise waste, or move it up the hierarchy are 'invest to save'. However, it is difficult to quantify and demonstrate the financial impact of these projects, because waste that is prevented (or reduced) cannot be measured. As a guide, it costs more than £100 per tonne to treat residual waste and the Council manages approximately 100kt residual waste each year. Therefore, a 1% reduction in residual waste could save £100k. Business cases should be developed for each of the invest to save projects to determine the investment required and the payback period for any savings that are deliverable within each project. Funding can therefore be determined for these schemes on a case by case basis as required.

7.2 Legal

7.2.1 The Resources and Waste Strategy will help the Council fulfil its statutory duties. Legal advice will be taken for any procurements that are required to implement the Strategy, or where any significant service changes are proposed that will be the subject of a separate Cabinet decision.

7.2.2 The national legislation related to local authority waste management and street cleansing is subject to regular review and change. Changes will be monitored to ensure that West Northamptonshire's service remain compliant with legislation.

7.3 Risk

7.3.1 The key risks are:

	Risk	Mitigation
i.	DEFRA may change national legislation which means the Strategy has to be changed.	The Strategy has been developed with the intention that it is flexible because it is a set of principles, which can accommodate changes in legislation.

		The Strategy will be reviewed annually so any changes in legislation can be taken into account as they are known.
ii.	Funding to secure the projects on the action plan will not be secured.	Discussions as part of the budget setting process are on going. Some of the projects are invest to save and may be able to proceed where there is sufficient confidence that they will not adversely impact the budget.
iii.	Funding for waste services may be reduced, which results in service changes that are not aligned to the Strategy.	Budget setting discussions occur annually as part of the Council's medium term financial planning process. One of the principles of the Strategy is to deliver value for money services, and this will be a continued objective of any service changes, alongside consideration of the other 9 principles (including to increase performance, reduce waste, etc.)
iv.	There is a risk that new contracts procured will not be consistent with the Resources and Waste Strategy.	The Strategy has been developed in consultation with a Waste Members Working Group who will be involved in the development of specifications for new contracts.

7.4 Consultation and Communications

7.4.1 The vision, which provides the 'headlines' of the Strategy, has recently been the subject of a public consultation (Appendix B). More than 3000 responses were received, which is a high response rate, demonstrating how important waste services are for West Northamptonshire's residents. The results of this consultation have been analysed and used to refine the Resources and Waste Strategy.

7.4.2 In general, the consultation responses were supportive of the proposed vision. Customer satisfaction was most important to respondents, followed by preventing and reducing waste and protecting the environment. Some changes to the Strategy have been made as a result of the consultation, including to increase the emphasis on waste education, and other specific projects included in the action plan.

7.4.3 If, in the future, any specific significant changes to services are proposed, these will be the subject of further consultation and a separate Cabinet paper and decision. For example, if after the development of a business case for 3 weekly collection of residual waste is developed and a separate consultation has been completed, there is a proposal to implement this change, then this decision would be the subject of a separate Cabinet paper.

7.4.4 Communication and consultation will play a key role in delivering the strategy, not just by informing decisions related to service changes, but also to help engage with West Northamptonshire residents and encourage behavioural change.

7.5 **Consideration by Overview and Scrutiny**

7.5.1 A Waste Members Working Group was established in December 2022 to steer the development of the Resources and Waste Strategy. The group includes representatives from the 3 geographic areas of West Northamptonshire and all political parties. The group has regularly reported progress to the Place Overview and Scrutiny Committee.

7.5.2 The Waste Members Working Group have reviewed the draft strategy and the consultation outcomes and are in agreement with the final draft of the Resources and Waste Strategy that Cabinet are asked to agree.

7.5.3 The Waste Members Working group will continue to be involved in the implementation of the Strategy by steering the development of the specification for services as existing arrangements expire.

7.6 **Climate Impact**

7.6.1 The climate impact of managing municipal waste is minimised when it is managed in accordance with the waste hierarchy. This means waste should be prevented where possible, reused, recycled, energy recovered and as a last priority landfilled. This is one of the principles of the Resources and Waste Strategy.

7.6.2 In addition, there is a principle to consider carbon emissions and improve sustainability of waste management in all decisions related to waste services.

7.7 **Community Impact**

7.7.1 Waste services are a 'front line' service provided directly to all West Northamptonshire's residents. The Strategy consultation has highlighted that customer service is important to residents. Therefore, this will be a key consideration when making any changes to waste services.

7.7.2 As noted previously, if there are any significant service changes proposed, these will be the subject of a separate Cabinet report.

7.7.3 Overall there is limited community impact from the proposals. An Equality Impact Assessment screening form has been completed and this has not identified a negative impact.

8. Background Papers

None.

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Resources and Waste Strategy

Foreword

I am pleased to introduce West Northamptonshire Council's first Resources and Waste Strategy. This Strategy has been produced by a Working Group of Elected Members and Council officers, with expert advice from a team of technical consultants and informed by the views of our residents, following formal public consultation.

A key priority for West Northamptonshire, endorsed by our residents is ensuring we have a sustainable approach to dealing with our waste, and that we minimise the waste we produce whilst maximising the waste we recycle. We want to become more efficient and build on what is already a valued service, reflecting the needs of our very different communities.

Through the production of the Strategy, we have created a vision of how we see West Northamptonshire Council's waste services developing in the future. The vision incorporates ten principles which cover all aspects of the service, and which are described in full in this document.

The Strategy will be used in the forthcoming years to inform our decision making on waste services matters, as we harmonise and develop services to meet the needs of our residents, customers and the requirements of central government. There will be an enhanced focus on waste prevention which, our residents have told us is important to them. Waste prevention provides the maximum environmental and economic benefits of all waste management options. We will be exploring how we can maximise the reuse of waste items and materials, through both our own services and working in partnership with others. We will be looking at how and when we collect the household and commercial waste from our residents and customers for reuse, recycling, composting, treatment and disposal, to provide a harmonised service which increases recycling, reduces the amount of waste sent for treatment and disposal and reduces carbon emissions. In Street Cleansing we will be reviewing services and working with partner organisations and voluntary groups to better co-ordinate efforts to make West Northamptonshire a clean and green place to live, work and visit.

Although a new authority in 2021, West Northamptonshire, through its legacy councils has a proven track record in providing high performing and cost-effective waste management services. We have been in the top 10 in the national league tables for recycling performance and received industry recognition for innovative and ambitious service provision. Through our new Resources and Waste Strategy we wish to build on this legacy; levelling up examples of good practice across all waste services in West Northamptonshire. Now that we are a unitary authority, we have the ideal opportunity to make holistic decisions for both waste collection and disposal. Residents are already experiencing better customer service, more comprehensive waste communications and more materials collected for recycling than ever before. For example, a new waste electricals and battery collection service was introduced in Daventry, and all residents have waste services information at their fingertips with a new 'West Northants App' and residents' magazine.

We aim to be ambitious but realistic, taking the views of our residents and the financial constraints in which the Council operates into consideration.

We currently recycle or compost 47 % of all the household waste that we collect and 3 % is reused (soil and hardcore). A further 38 % going to waste treatment facilities and 12 % landfilled. Through this Strategy we are setting targets to reduce the tonnage of general waste, boost recycling and further reduce the need to send waste to landfill. Each year we will review and update an Action Plan, detailing how these targets will be achieved and what resources are required to do so.

I would like to thank the Members, officers and consultants for their hard work in researching and drafting this Resources and Waste Strategy. Most of all I would like to thank our residents and customers for diligently separating your waste for recycling and to the over 3,000 interested people who took the time to respond to our Resources and Waste Strategy Consultation. We hope that you will continue this journey with us as we transform services and deliver the Strategy Vision.

Cllr Phil Larratt

Cabinet Member for Environment, Transport, Highways and Waste

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Executive Summary

A Resources and Waste Strategy for West Northamptonshire has been developed. The purpose of the Strategy is to provide a sustainable 15-year vision for waste and street cleansing services, which will inform decision making related to these services. The result will see services becoming harmonised over the West Northamptonshire area as current arrangements end.

The Strategy is a set of 10 principles, which will be used to guide the development of waste services in West Northamptonshire as they evolve and harmonise, and to ensure waste services are delivered in accordance with the wider ambitions and objectives of the Council.

The 10 principles are:

1. To provide appropriate, harmonised waste services;
2. To move waste up the waste hierarchy;
3. To support local prevention initiatives and increase waste education;
4. To deliver high performing services, recycle more and achieve other targets;
5. To ensure waste services are value for money;
6. To invest in West Northamptonshire's waste infrastructure to support performance and value for money;
7. To consider future changes when designing services;
8. To work with partners to improve street cleansing;
9. To consider carbon emissions and sustainability in our decisions regarding waste services;
10. To align waste services with West Northamptonshire Council's wider values and strategies.

The development of the Strategy has been steered by a cross-party Members Waste Working Group, with expert input and verification by independent consultants, and has been tailored using the feedback from a public consultation.

The Strategy does not seek to answer all possible questions about how services might change in the next 15 years. As contracts and existing arrangements expire, the vision and 10 principles will inform decisions about replacement arrangements. If significant changes to services are proposed, these will be the subject of a separate business case, consultation and Cabinet decision as required.

An action plan is included within the Strategy which gives an overview of the projects and work that will be carried out to implement the vision. Progress against the action plan will be reviewed and the action plan will be updated annually.

1. Introduction

West Northamptonshire's 425,000 residents receive waste services on a weekly basis and many residents will list waste as one of the key services they receive from the Council. This high level recognition of waste as a Council service and the scale of the operation means it is essential that we have a robust plan for developing these services for the future.

West Northamptonshire Council's Resources and Waste Strategy has been produced by a team of Officers and a working group of Members, with expert advice from external consultants and informed by the views of our residents and our commercial customers.

In developing this Strategy, a public consultation exercise was completed during the summer of 2023. The feedback received has been incorporated into this Strategy and its action plan.

The purpose of this Strategy is to set out the strategic approach that West Northamptonshire Council will take in managing the 183,500 tonnes of local authority collected municipal solid waste we collect annually, covering the fifteen-year period from 2024 to 2039.

The Strategy builds upon the work of our predecessor councils and takes account of potential changes in Government policy in waste collection, disposal, the wider circular economy and carbon reduction. As the first Resources and Waste Strategy we have published as a unitary authority, the Council is able to take a holistic approach to waste management from waste prevention, collection, treatment through to disposal ensuring the best economic and environmental outcomes for our residents.

Scope

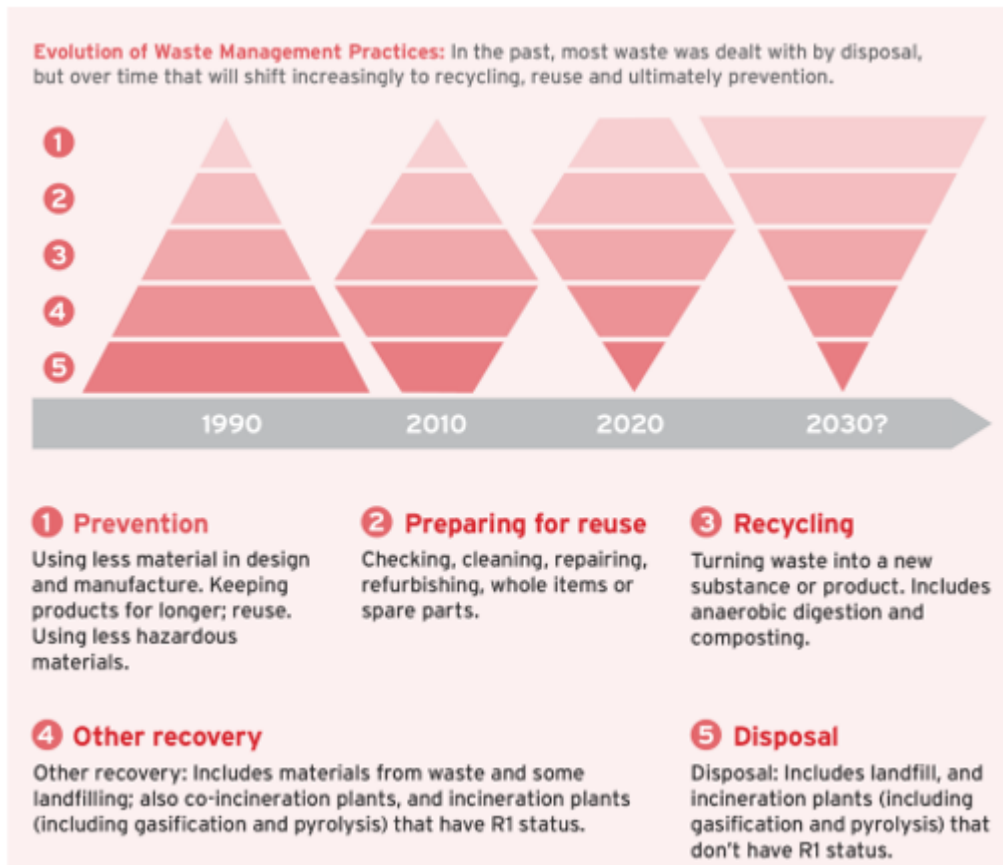
This Strategy addresses all the waste managed by West Northamptonshire Council, collected by our kerbside collection services, and at our network of Household Waste Recycling Centres (HWRCs). This waste includes "household waste", which is the waste we collect from households, street sweepings, litter, and waste received at HWRCs, as well as commercial waste from our trade waste customers, and waste from clearing up fly-tipping incidents.

The Strategy includes all the waste streams we collect – residual waste, commercial, recycling, garden waste for composting, food waste, clinical waste, items of bulky household furniture, waste electrical items and batteries. We have also included our street cleansing service in this Strategy as it is intrinsically linked to the waste service as a whole.

Context

Waste management has evolved over the last 40 years to become more focused on waste prevention, reuse and recycling (Figure 1) and our Resources and Waste Strategy will build on this as we plan for the next 15 years.

Figure 1 Evolution of Waste Management Practices



Waste legislation and statutory guidance is frequently subject to change (Appendix C). In December 2018, the Government published its Resources and Waste Strategy for England, detailing its proposed approach for how it will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England. At the time of developing this Strategy, the final details of how the national strategy will be implemented are still unknown. Therefore, in producing our Strategy for West Northamptonshire, we have taken a flexible approach to ensure that any future government requirements can be accommodated once they are known.

Vision & Ambition

Members and Officers have developed a Vision for how we would like to see the Council's Waste Services developing in the future (Figure 2). In this Strategy document we provide more details of the ten principles of this vision, explaining why each is important and setting out how we plan to achieve them. Each year of the Strategy we will produce an Action Plan, detailing progress made, and the projects and actions planned for the forthcoming year, which will contribute to achieving the vision.

Figure 2 Resources and Waste Strategy Vision



Working with our residents, elected members and contractors we will implement the Strategy through the annual action plan and review and report on the progress we have made. The Strategy Action Plan will:

- look at ways to reduce non-recyclable waste and move waste up the hierarchy
- identify best practice waste collection systems to provide efficient services (such as waste tracking, route optimisation and data driven decision processes)
- explore technologies used for treatment of this waste, including emerging technologies and the roles they play in providing cost-effective, long-term collection, processing and treatment solutions, and
- include key projects required to help implement the vision.

2. 'Provide appropriate, harmonised waste services'

Kerbside Waste Collection Services

West Northamptonshire Council currently (2023) operates a comprehensive kerbside household waste collection service, providing residents with a convenient and reliable way to reuse, recycle or dispose of their household waste. These kerbside waste collection services are delivered by a range of operating models (via a commercial waste collection organisation, a joint venture and by directly employed staff). This is because as a new authority formed in 2021, West Northamptonshire Council has adopted the waste collection and disposal arrangements from its predecessor authorities. As a result, there are some differences in the way waste is collected across West Northamptonshire. Further details about the current kerbside collection services are provided in Appendix A.

Our aim for West Northamptonshire's kerbside waste collection service is to ensure that all residents can recycle the same range of materials regardless of whether they live in a house, terraced house or flat. This work will include investigating the relative merits of different collection frequencies (in terms of recycling performance, cost, carbon emissions and customer service) and consider the collection containers used, taking into account the space available at the property for wheeled bins. Residents' services will be tailored where appropriate, so that services are suitable for different housing types.

Harmonising services will be a gradual process, due to the existing contractual arrangements, with long term objective that from 2028 we have one delivery method to provide appropriate, harmonised kerbside waste collections across the whole of West Northamptonshire.

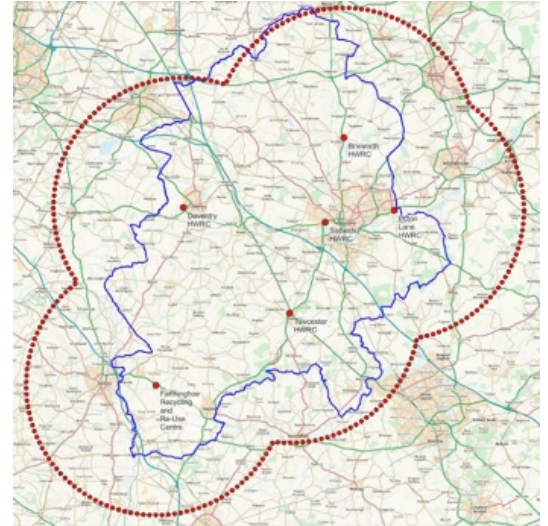
What did our residents say?

- 67% of respondents agreed/strongly agreed that all households should have their waste collected in the same way and the same frequency.
- We also asked which bins were usually full by collection day. Only 21 % of residents' general (residual) waste bins were full on collection day. Whereas 38% of respondents said their recycling bin was full by collection.

Household Waste Recycling Centres

Our network of six Household Waste Recycling Centres (HWRCs) also form an important part of our waste collection services. Residents can bring a wide range of waste materials for reuse and recycling to all six sites. Non-recyclable (or residual) waste is accepted at all sites except Farthinghoe, which is for reusable or recyclable waste only.

Further information about the HWRCs is provided in Appendix A .



Currently, our residents are well served with access to HWRCs with 99 % of residents living within 10 miles (as the crow flies) of a site. However, our sites vary in age and size, with some being split level, allowing easy access to the skips for the various materials accepted and other sites use metal ramps to enable residents to access skips.

As part of implementing this Strategy and improving waste services in West Northamptonshire, we will consider options to invest in the HWRC infrastructure. This may result in the number or location of sites changing.

The arrangements for delivering these services are due to change in 2025 when the contracts expire, so other aspects such as the operating hours and the reuse services will be considered and aligned with the implementation of this Strategy.

The objectives of any investment and changes to these services would be to increase the amount of material that is collected for reuse and recycling, to improve the accessibility of these services and improve services for our residents.

What did our residents say?

- Our residents said they would like to see more reuse options at our HWRCs, with 80% of respondents saying that they would donate items and 42% of residents saying they would buy items.
- The majority of respondents said they would like the ramps to be removed and the sites re-developed into split-level for ease of use.
- The majority of respondents would like the opening days and times to be reviewed and increased to enable increased access.
- 59% of residents agreed that the sites should be restricted to West Northamptonshire residents.

3. Develop services that prevent waste first and reuse, recycle and recover energy where possible'

When considering how to deal with the 183,500 tonnes of municipal waste managed in West Northamptonshire each year, the Council will apply the waste hierarchy when making key decisions.

The “waste hierarchy” (Figure 3) prioritises waste management options according to what is best for the environment. It gives top priority to preventing waste in the first place. When waste is created, the best options are to reuse it, then recycle it, then recovery, and last of all disposal (e.g. landfill).

In 2021/22 of the total waste collected by West Northampton through its kerbside services or its network of Household Waste Recycling Centre:

- 3% was reused
- 47 % was recycled
- 38 % had energy recovered from it
- 12% was landfilled



Figure 3, The Waste Hierarchy

Waste Prevention

Not only does preventing waste result in the best environmental outcomes, it also saves the Council and therefore our residents, the most money through avoided waste collection and disposal costs.

The impact of waste prevention initiatives can only be measured by looking at the tonnage of residual waste collected per household (and business) and seeing a decline over time.

The Council will consider ways to enable waste prevention, including:

- Promotion of home composting
- Providing advice on how to reduce junk mail
- Facilitating the use of real nappies rather than disposables
- Promotion of food waste prevention through meal planning, using up leftovers and use of community food larders
- Promotion of repair cafes, hiring rather than buying and establishing libraries for the loan of certain items
- Promoting behavioural change such as use of refill shops/options and avoiding products that are heavily packaged
- Restricting residual waste capacity by providing smaller bins or by collecting residual bins less frequently

Waste Reuse

Reuse includes activities such as upcycling, selling or passing on secondhand furniture and clothes, and re-purposing waste objects into something useful. Residents will engage in many reuse activities without any involvement or encouragement from the Council: for example, selling unwanted items online, taking clothes and bric-a-brac to a charity shop and reusing shopping bags. There are, however, ways in which the Council can facilitate and further encourage reuse, through education and communication activities, and we will increase our focus on this area, by including targeted projects in the annual action plan.

Recycling

Recycling involves converting waste material into something which can be used again. It can become the same thing, for example recycling glass bottles into more glass bottles or something different, for example, recycling plastic bottles into fleece jumpers. Composting of garden waste and anaerobic digestion of food waste is included in recycling as new, useful products are made from the waste materials. In the case of food waste, compost like material and renewable energy are produced.

The Council offers comprehensive kerbside recycling services to most households and to our commercial customers, collecting a wide range of recyclable materials. Additional materials can be recycled at HWRCs. We will continue to promote and invest in these services, exploring opportunities to expand them to more households and to collect more materials when this becomes possible.

Energy Recovery

There will always be waste that cannot be recycled and which requires safe and cost-effective disposal. Residual waste has a high caloric value, meaning that it contains energy which can be released to generate partially renewable energy. Energy can also be recovered from organic waste through the creation and capture of biogas during composting and anaerobic digestion. Consequently, the Council has a preference for generating energy from residual waste rather than disposing of waste in landfill.

Disposal to Landfill

The last waste management option is landfill, where the waste is buried and allowed to slowly rot down over time. Less energy is recovered because the waste is not burnt and there is the potential for pollution of the atmosphere and ground water, although modern landfill sites are very carefully managed and monitored. Also, when waste is landfilled, the resource can only be used once (with no option to recycle or recover energy). For these reasons, landfill will be the last option that is considered for the disposal of waste. However, there will always be some waste where landfill is the only permitted option because it is not suitable for treatment or recycling, and there may also be some residues after energy recovery that require landfilling.

Government Targets

The UK government recognises the importance of waste reduction and through its 2023 Environmental Improvement Plan set a target to halve residual waste produced per person by 2042.

Although a national target, the Council will aim to contribute to the achievement of this target by implementing waste reduction policies and projects, details of which will be included in the annual action plan.

What did our residents say?

- The consultation highlighted that there is a lot of scope for the Council to enable waste prevention and recycling and this is something that our residents would support.
- For example, 45% of residents would like to use reusable nappies, 55% of residents would like to donate to or use community larders and 33% would like to compost at home.

4. 'Support local waste prevention and reuse initiatives and Increase Waste Education.'

As discussed earlier, waste prevention is at the top of the hierarchy and should be considered before any of the other options below it.

Waste Prevention has the best environmental outcomes of all waste treatment options. The waste does not have to be collected and treated, saving the emissions (including carbon) associated with those activities and the costs of providing them and preserving valuable resources.

There are many commercial, charitable and voluntary sector organisations, who work in the field of waste prevention either directly or indirectly. They often work outside the scope of West Northamptonshire Council, but they carry out great work and help to reduce the amount of waste that the Council is required to collect for either reuse, recycling or disposal.

Waste prevention initiatives often have other knock-on benefits to the wider community than just preventing waste. For example, charities who collect items of unwanted furniture for reuse prevent those items from becoming waste but also provide cheaper furniture for those on low incomes, who cannot afford to buy new.

Another example of waste prevention is the network of community larders. They take unsold food and groceries from local supermarkets and businesses, which would otherwise be wasted. The food is sold at a heavily discounted rate to members of the community larder, who are on a low income. This helps them to provide nutritious and affordable meals for their families.

Through this Resources and Waste Strategy, the Council wishes to promote, support and facilitate waste prevention activities undertaken by outside organisations to enable them to grow, reach more residents and therefore have a greater impact.

This work has started in our support and promotion of the Community Larder network in West Northamptonshire. In the annual action plan, we will provide details of the other projects we wish to work with and facilitate.

Waste Education

Raising awareness about waste and recycling issues is an important part of this Resources and Waste Strategy and will contribute greatly to its successful implementation.

Waste Education can take many forms but includes;

- Speaking to school children about waste and recycling, who may pester their parents into action and who will become the citizens of the future.
- Increasing awareness of the reasons why it is important to reduce and recycle waste and not to drop litter, so that behaviour is changed, good habits are formed, and it becomes a way of life.
- Ensuring that all residents know how to correctly take part in the recycling services provided by the council means that they run more efficiently, and we reduce the cost of contamination in recycling containers.
- Empowering West Northamptonshire’s residents to be ‘responsible consumers’ helping the Council to achieve its recycling targets and reduce waste and therefore the cost of waste services.

Waste education is a theme which runs through the Resources and Waste Strategy and will feature heavily in the annual action plan.

What did our residents say?



5. 'High Performing Services'

The Council, working with its residents and communities, can contribute significantly to the effectiveness of protecting and conserving the environment, by increasing the amount of material that is recovered for reuse, recycling and composting and working towards a circular economy.

There are some challenges which need to be considered as part of aspiring to have high performing services, such as increasing waste tonnages due to population growth, contaminated recyclables and financial constraints.

In delivering this Strategy we will explore ways in which services can be high performing, finding solutions to the challenges and learning from best practice elsewhere.

Wardell Armstrong case study on high performing authorities.

The best performing authority in minimising residual waste generation is East Devon. Here dry recycling and food waste collections are offered weekly, with residual waste only collected once every three weeks. In addition to restricting the frequency of residual waste collected, bin capacities have been reduced to 180 litres, providing a nominal weekly allowance of just 60 litres. The Council does not collect any loose waste or additional bags, however it does provide a one-off chargeable collection of residual waste should residents request an additional collection.

Targets

We have set targets which take account of our current performance, the Council's ambition and central Government's national targets as follows:

West Northamptonshire Targets

- Increase the amount of waste that is recycled and composted from 47 % to 50 % by 2030.
- Reduce waste to landfill from 12 % to 10 % by 2028.
- Become net zero in Carbon emissions within directly delivered Council activities by 2030.
- Contribute towards West Northamptonshire becoming net zero in Carbon emissions by 2045.

National Targets

- Reduce residual waste tonnage by 24 % by 2028.
- Halve residual waste generated per person by 2042.

We believe that these targets are challenging and achievable and take account of constraints, such as costs and availability of markets for recyclable materials.

We will report on progress made on these targets as a part of the annual Action Plan, where we will also review them for subsequent years. We will identify areas for continuous improvement, involving residents, businesses, and communities in waste management plans.

What did our residents say?

- 68% of our residents told us that they believe high recycling performance is very important and in doing so protect the environment.
- However, customer service is also a priority for respondents.

6. 'Value for Money'

West Northamptonshire Council's services are provided using public funds and the Council is responsible for ensuring that it provides 'value for money services' by securing the services and products that it procures achieving best value and by maximising the efficiency of delivering all services. Our residents can help us provide waste services at the lowest cost by reducing the amount of waste they produce, and we will encourage and enable them to do this. Likewise, we will support our residents in putting the right materials in the right containers, which in turn reduces the overall costs of the management of waste.

The formation of West Northamptonshire Council brought together three waste collection areas (Daventry, Northampton and the South) and the waste disposal functions, which means decisions about waste services can be made holistically, for the whole geographic area and take into account waste collection and disposal costs.

Efficient Services

Like other Council services, the efficiency of delivering waste services is a key consideration in keeping costs as low as possible. Benchmarking with and learning from other similar authorities, taking into account factors such as geography (rural / urban mix), demographics and population size will help the Council ensure the cost and quality of its waste services are at least comparable with other similar authorities.

Optimising waste collection rounds across the whole of West Northamptonshire as existing contractual arrangements end, will help to reduce the mileage covered by our waste collection vehicles and consequently reduce the amount of fuel used, the associated costs and carbon emissions.

When new waste services are procured, or decisions are taken about changes to services, the cost implications for the whole waste system will be considered – something which was difficult prior to becoming a unitary authority. When the specification for the new Household Waste Recycling Centre services is developed, consideration will be given to controls which help ensure that only waste which should be disposed of for free can be disposed of at no charge, to help minimise the costs to the residents of West Northamptonshire.

Savings

As well as reducing carbon emissions, preserving natural resources and other beneficial environmental impacts, moving the management of waste up the waste hierarchy can help save money. However, this is not a universal rule, since very high recycling performance may come at an increased cost. Therefore, the targets included in this Strategy balance the need for the services to be efficient.

When making decisions about waste services, customer satisfaction is an important consideration, although it is recognised that any change to a waste collection service may

negatively impact on customer satisfaction until residents become used to the changes. However, waste services are only one of many essential services delivered by the Council, which is why the cost of waste services should be kept as low as possible, whilst maintaining acceptable service standards.

Waste services that are delivered via a contract will continue to be subject to competitive procurement processes to help ensure the best value providers. As contracts expire and new arrangements are secured, there may also be economies of scale as the geographic areas of West Northamptonshire are considered as one.

Income generation

Some of the materials that are collected at the kerbside and at the Household Waste Recycling Centres have a monetary value. For the Council to secure the highest value for these materials it is important that reusable items which are in good condition, and co-mingled dry mixed recyclables collected at the kerbside should be free from contamination.

Like the majority of local authorities, West Northamptonshire Council levies a charge for the collection of garden waste, ensuring that only those who use the service, pay for it. The charges have been harmonised across the Council area, and income is used to contribute to the rising costs of providing the waste collection services.

The Council offers a paid for 'bulky waste collection' service for items which residents may find difficult to transport to the Household Waste Recycling Centres. We recognise that when residents want to dispose of something they would rather it was quick and convenient. We will review this service to increase reuse of furniture and white goods and ensure sufficient capacity so that the service is responsive to resident's requests. This may increase income and help reduce fly tipping.

West Northamptonshire Council also offers a (chargeable) waste service for commercial customers to dispose of their trade waste and recycling. This is a local service, offering recycling services for a wider range of materials than other traditional waste management companies. Expanding this service will help increase the Council's income and increase recycling.

Finally, by developing its own waste facilities, the Council may be able to sell any spare capacity to generate an income which could help to subsidise the increasing costs of waste management. For example, the Council may decide to develop a Materials Recycling Facility which can sort West Northamptonshire's Dry Mixed Recyclables (DMR) and possibly have space for other Councils' material. Developing waste facilities requires significant investment and is a long-term project but may be beneficial in keeping West Northamptonshire Council's waste service costs low and generate an income.

What did our residents say?

62 % of our residents said that it is very important that we reduce service costs, although 87% prioritise customer satisfaction over cost.



7. 'Invest to become self-sufficient'

The majority of West Northamptonshire's waste infrastructure was established decades ago and there have been many changes in the waste collection systems and population of the area since.

Even relatively simple waste facilities such as Household Waste Recycling Centres and Waste Transfer Stations are designed with a tonnage throughput in mind and population growth in the area means these facilities are operating at close to capacity.

The Council doesn't own any waste treatment facilities such as anaerobic digestion facilities for food waste, open windrow composting facilities for green waste, materials recycling facilities for sorting dry mixed recyclables or energy from waste facilities for treating residual waste. This means it is currently reliant on commercial waste management companies to process these waste streams and the Council may be able to achieve better value for money by investing in its own waste processing infrastructure.

Although West Northamptonshire is fortunate to be well served by commercial waste facilities within reasonable distance for some waste streams, as part of implementing the Resources and Waste Strategy, consideration will be given to potential opportunities for the Council to develop its own facilities. This approach may have non-cashable benefits such as long-term security of capacity, control over operating parameters and risks and certainty of processing costs. However, detailed business cases would be required to determine the risks and financial viability since the investment required in these facilities can be significant.

There is also a potential opportunity for the Council when considering the development of waste treatment facilities, which is to sell any spare capacity at a commercial rate, and this would help reduce the cost of the facility for West Northamptonshire Council and our taxpayers. Neighbouring authorities may be interested in co-development, which may reduce costs and enable economies of scale and a partnership arrangement is another option to consider and take into account in a business case.

Since developing a detailed business case can cost a considerable amount and also take time, the options most likely to offer the best opportunities have been identified with the help of independent experts (Wardell Armstrong). These options are outlined in Appendix B and will be the focus of an initial waste infrastructure review.

8. 'Future proof for national requirements'

One of the objectives of the Resources and Waste Strategy is to provide a clear vision regarding the principles for the waste service, to inform decisions regarding changes to the service as they evolve.

By having a set of principles with a supporting action plan that is reviewed regularly, the Council will be able to take into account of:

- Changes in legislation and statutory guidance;
- Changes in market conditions, for example changes in the value of materials or treatment capacity that are likely to have a long-term impact;
- Changes in local policies or politics.

We will also 'build in' flexibility by:

- Using research, including the work completed to develop this Strategy to inform decisions on how we deliver services and the specification for our services;
- Considering partnering with other local authorities to provide resilience and share risks;
- Using data and trends to forecast what might happen in the future, for example how growth in West Northamptonshire might affect the waste collected;
- Ensuring the terms and conditions of our future contracts allow for changes.

Future Service Delivery and Emerging Technologies

As part of implementing the Resources and Waste Strategy, West Northamptonshire Council will engage with the industry to benefit from their expert knowledge on the best technologies being used for specific parts of the waste management system. We will do this as part of informal 'market testing' prior to making decisions about changes to services or procuring new services.

Whilst we wish to embrace advances and improvement in technology, we are also mindful of the importance of using established and reliable options when making multi-million-pound investment decisions and spending tax payers' money.

9. 'Work with Partners to Improve Street Cleansing'

Litter within our Council area is unsightly, it has a negative effect on the perception of the area, and it is also hazardous to the environment and wildlife. Litter is a sign that people do not respect their local environment which can then lead onto other issues.

Street cleaning, including picking up litter, places a significant financial and resource burden on local authorities, and a poor local environment can discourage inward investment which could result in suppression of property prices, damaging local economic growth. Therefore, it is in everyone's interest to tackle this issue.

West Northamptonshire Council has a statutory duty to keep 'relevant land' clear of litter and refuse, as far as is practicable. Tackling litter is a wider issue than just clearing it up, and prevention is better than cure. Through implementing this strategy, we will help to educate our residents and communities to not drop litter which will help to keep the area clean and tidy and save valuable resources which can be spent on other essential services.

Enforcement activities compliment education activities to help the "war on litter" and colleagues in the Council's Environmental Protection Team have suite of powers that can be used to deter littering and fly-tipping and to require business owners to clear litter from a designated area around their property.

The Waste Team will work with other teams within the Council with the objective of reducing fly tipping, addressing this anti-social behaviour through education and enforcement.

The Council is not the only organisation responsible for keeping West Northamptonshire litter free. There are many other organisations who have a role, and in some cases, a statutory responsibility, including educational establishments, National Highways, Town and Parish Councils, Network Rail, private land owners and businesses. In addition to this, there are many voluntary organisations operating in West Northamptonshire who take an active interest in litter and fly-tipping issues, undertaking litter picking activities and educational work.

To create a truly 'Clean and Green' West Northamptonshire all interested parties need to work together. The Council will adopt a coordination and facilitation role in bringing the organisations and other Council colleagues with a responsibility and interest in litter together to combine efforts to bring about the best outcomes.

What did our residents say?



10. 'Embed our aim to reduce our carbon emissions and improve sustainability in all decisions'

The build-up of carbon dioxide (CO₂) and other greenhouse gases are causing the atmosphere to warm, creating global changes to the climate.

Following its declaration of a climate emergency, the Council has adopted ambitious targets to achieve net zero emissions of 'carbon' (carbon dioxide and other gas implicated in global warming, measured as tonnes of carbon dioxide equivalent warming potential). These are for the Council to achieve net zero in its own operations by 2030 and for West Northamptonshire as a whole to achieve net zero by 2045.

The Council's handling of waste falls under the 2030 target, whereas emissions from the waste itself, as it is generated by the residents and business of West Northamptonshire and visitors to the district, falls under the 2045 target.

The implementation of this Resources and Waste Strategy can help contribute to achieving these targets by reducing waste, increasing recycling, and considering carbon emissions in our choice of vehicle fuels, collection methods and waste treatment options.

The Waste Hierarchy and Carbon Emissions

Reducing Waste

By reducing the amount of waste we create, we reduce our carbon emissions and we use resources more sustainably.

By making informed decisions about our choice of purchasing items, such as considering how a product is packaged or using refillable and reusable resources, we can all help to reduce the amount of waste produced.

Recycling

Recycling helps reduce greenhouse gas emissions by reducing energy consumption. Extracting and mining raw materials to produce new products requires far more energy (producing more CO₂) than manufacturing products from recycled materials.

When we reuse products made of recycled paper, plastic, glass and metal, or buy less new/packaged items, we reduce the amount of energy required in manufacturing and transporting items.

Using a disposable water bottle a day for a year, results in the same climate pollution as driving 147 miles in a diesel or petrol car.

The average person bins around 131kg of food each year (25% of what they buy). This results in the same climate pollution as driving 876 miles

If the average person throws away even half the paper they use in a year instead of recycling it, they increase climate pollution by the same amount as driving 526 miles.

Waste Disposal and Treatment

In 2020, the waste management activities of the Council contributed 105.6 kt of CO₂ in West Northamptonshire. The majority of these emissions was from closed landfills which were filled with waste decades ago, but the waste within them is still decomposing and emitting greenhouse gases.

The long term impact of disposing of waste in landfill highlights the importance of moving waste up the hierarchy. This Strategy aims to reduce the amount of waste disposed of in landfill through community engagement, education, and through use of alternative collection and treatment solutions.

Transport of Waste

Waste is transported from the point it is collected from a resident's house to its final treatment point. Currently our fleet of refuse collection vehicles is powered by diesel, and many of our waste cleansing service vehicles are powered by electricity.

In implementing this strategy, the Council will consider the carbon emissions associated with transporting waste and cleaning our streets.

When considering changes to our waste services, we will seek to minimise these emissions by optimising our waste collection routes to help shorten journeys for street collection and cleaning vehicles

To help reduce carbon emissions, we will consider the use of alternate fuels in our vehicles and also ensure our electricity is generated from renewable sources, as set out in the Estates Climate Strategy.

West Northamptonshire Council has secured funding to develop an electric vehicle strategy which will help inform decisions about the use of electric vehicles in our waste collection fleet. However, we recognise that electric vehicles are not the only solution and all alternative fuel options will be considered, such as biodiesel, hydrogen and Hydrogenated Vegetable Oil.

What did our residents say?



11. 'Align service development with our corporate values'

As a relatively new unitary Council, there are a wide variety of policies, strategies and plans which will be developed over a number of years to reflect the objectives, culture and ambitions of West Northamptonshire Council. Some of these plans have been developed and adopted, whilst others are in development. However, all plans should be coordinated and consistent, to ensure the Council's resources are targeted to achieve its overall desired outcomes.

The Council's vision is to make West Northamptonshire a great place to live, work, visit and thrive and has adopted six priorities to achieve this (Appendix D). More information is available on the Council's website (www.westnorthants.gov.uk).

Waste Services closely align to the 'Green and Clean' priority, and also help to deliver aspects of 'Thriving villages and towns', 'Growth and Prosperity', 'Robust Resource Management', and 'Improved Life Chances'.

There are also a number of strategies which the Council is in the process of developing, or which have recently been adopted. This Resources and Waste Strategy is aligned with these and will help deliver aspects of them (Appendix D).

In the same way that waste services can positively contribute to the delivery of the wider council's strategies, so can other council services contribute to the delivery of this Resources and Waste Strategy. For example, the Council's specifications for works or services could include the requirement to use reused or recycled materials (for example, as proposed in the Construction and Maintenance Climate Strategy); education colleagues can promote our sustainable waste management approach; and public health colleagues can ensure that disposable vapes are not part of smoking cessation measures.

The implementation of the Resources and Waste Strategy will also benefit from coordination with Town and Parish Councils who are the 'grass roots' of Local Authorities representing the needs of their local communities and helping to communicate and deliver service initiatives.

12. Conclusion

The objective of West Northamptonshire's Resources and Waste Strategy is to provide a set of principles which will inform and guide decisions related to our waste services to result in a sustainable and resilient waste management system.

The principles are:

1. To provide appropriate, harmonised waste services;
2. To move waste up the waste hierarchy;
3. To support local prevention initiatives and increase waste education;
4. To deliver high performing services, recycle more and achieve other targets;
5. To ensure waste services are value for money;
6. To invest in West Northamptonshire's waste infrastructure to support performance and value for money;
7. To consider future changes when designing services;
8. To work with partners to improve street cleansing;
9. To consider carbon emissions and sustainability in our decisions regarding waste services;
10. To align waste services with West Northamptonshire's wider values and strategies.

By prioritising reduction, reuse, and recycling, the environmental impact of waste can be minimised. The increased emphasis on education and awareness will empower West Northamptonshire's residents to be 'responsible consumers' and 'waste champions', helping the Council to achieve its recycling targets and reduce the cost of waste services.

We recognise the importance of involving local businesses and community organisations to achieve shared goals, drive innovation, implement best practice and help overcome challenges. We will implement this strategy by working together with our residents, industry experts, community stakeholders and other council services, to achieve our aim of a clean, green West Northamptonshire.

We will implement the strategy through the actions set out in the Action Plan (section 14) and we will monitor progress and performance, review and update the action plan annually.

13. Glossary

Anaerobic digestion (AD)	Biodegradable material (typically food) is enclosed in a container and oxygen is removed, encouraging the material to break down. This produces biogas, which is a renewable energy and can be used to generate heat and electricity. AD can produce solids/liquid known as digestate which can be used as fertiliser.
Circular economy	A circular economy keeps resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life.
Climate change	Climate change refers to a change in the state of the climate, causing changes in weather patterns on a global scale and for an extended period. Effects include changes in rainfall patterns, sea level rise, potential droughts, habitat loss and heat stress.
Composting (windrow)	Green waste is placed in long heaps, called windrows, normally outdoors. The windrows are turned mechanically every so often to expose air. At the end of 16 weeks, the compost weighs around half of the original waste and is distributed for agricultural and domestic use.
DEFRA – Department for Environment, Food and Rural Affairs	The government department responsible for the environment, food and rural affairs. DEFRA's remit within the environment includes waste management.
Dry Mixed Recyclables (DMR)	Mixed recyclable materials that are collected at the kerbside, including for example, paper, cardboard, cans, plastics, glass.
Energy from Waste (EfW) with heat capture	Energy from Waste is a recovery process that takes residual waste and turns it into electricity. Capturing and using the heat generated significantly increases the overall efficiency of the process and the environmental benefits
Household Waste Recycling Centre (HWRC)	A building or site where household waste can be deposited by residents for recycling, reuse or disposal.

Joint Venture (JV)	Joint Venture. An arrangement between two parties to pool resources to achieve a common goal.
Materials Recycling Facility (MRF)	A specialised plant that receives, separates and prepares recyclable materials for marketing to end user manufacturers.
Organic (Green) Waste	Organic material such as food and garden waste.
Recyclates	Any material that is able to be recycled.
Refuse Derived Fuel (RDF)	Fuel produced by shredding and dehydrating solid waste via waste conversion technology.
Relevant Land	Relevant land is land which is open to the air on at least one side, in our direct control and to which the public have access.
Renewable Energy	Materials and energy which in its production does not rely on fossil carbon such as gas or coal.
Unitary Authority	A council established in place of, or as an alternative to a two-tier system of local councils.
Waste Recovery	Includes the burning of waste to produce energy.
Waste Transfer Station (WTS)	A building of site for the temporary holding of waste prior to loading to larger vehicles for transport to processing facilities.
WEEE	Waste electrical and electronic equipment, is equipment which requires electric currents or electromagnetic fields in order to work properly.

14. Action Plan

No	Action	When?	Contributing to Strategy Principles										
			Support Local Waste Prevention Initiatives	Develop Services that prevent waste first and reuse, recycle and recovery energy where possible	Embed our aim to reduce our carbon emissions and improve sustainability in all decisions	High Performing Services	Value for Money	Work with Partners to improve Street Cleansing	Provide appropriate, harmonised waste services	Future proof for national requirements	Invest to become self-sufficient	Align service development with our corporate values	
1	Undertake a Waste Compositional Analysis of Residual was to evaluate what residents are putting into their general waste bins and how more that could be prevented or recycled.	By March 2024		✓		✓					✓		
2	Organise a series of Repair Cafes to facilitate the repair and therefore reuse of broken electrical items.	Launch by Spring 2024	✓	✓	✓	✓	✓						✓
3	Review and Update WNC's Litter Charter produced in 2021.	March 2024							✓	✓			
4	Continue to support and facilitate voluntary litter picking organisations through the provision of equipment and regular liaison.	On-going					✓	✓					✓
5	Facilitate a series of discussions with National Highways on co-ordination of works to tackle litter on the highways network.	On-going							✓				
6	Adopt a WNC wide approach to street cleansing including graffiti removal	Nov 2024							✓	✓			
7	Collaborative working with regulatory services to take action against fly-tipping.	On-going							✓				✓
8	Produce a business case for the introduction of 3 weekly collections for residents who live in houses across West Northamptonshire.	March 2024				✓	✓			✓			
9	Consider how textiles can be collected at the kerbside across the whole of WNC	June 2024		✓	✓	✓				✓			

No	Action	When?	Contributing to Strategy Principles									
			Support Local Waste Prevention Initiatives	Develop Services that prevent waste first and reuse, recycle and recovery energy where possible	Embed our aim to reduce our carbon emissions and improve sustainability in all decisions	High Performing Services	Value for Money	Work with Partners to improve Street Cleansing	Provide appropriate, harmonised waste services	Future proof for national requirements	Invest to become self-sufficient	Align service development with our corporate values
10	Produce a programme to introduce recycling services to flats	July 2024		✓	✓	✓			✓			
11	Undertake an options appraisal for service delivery method	March 2025				✓	✓		✓			
12	Review levels of communication with residents on waste services to ensure everyone knows how to correctly take part in the service.	Ongoing		✓		✓			✓			
13	Develop the specification for the new HWRC services contract, including consideration of: <ul style="list-style-type: none"> Number of sites and locations More Reuse and Recycling only sites? Reuse Shops on site? Consider controls at HWRCs, as part of new arrangements for HWRC services. 	Jan 24		✓		✓	✓			✓		
14	Undertake a HWRC mystery shopper exercise to determine level of help and advice given to customers.	June 24		✓		✓						
15	Support and promote the local Community Food Larder Network	Jan 24	✓		✓							✓
16	Benchmark with other, similar councils	Nov 24			✓	✓	✓					
17	Run a contamination campaign to reduce contaminants in DMR and secure highest value	On going		✓		✓	✓					
18	Expand commercial waste services	On going		✓		✓	✓			✓	✓	
19	Undertake route optimisation in geographic areas.	Review in Nov 24			✓		✓				✓	

No	Action	When?	Contributing to Strategy Principles									
			Support Local Waste Prevention Initiatives	Develop Services that prevent waste first and reuse, recycle and recovery energy where possible	Embed our aim to reduce our carbon emissions and improve sustainability in all decisions	High Performing Services	Value for Money	Work with Partners to improve Street Cleansing	Provide appropriate, harmonised waste services	Future proof for national requirements	Invest to become self-sufficient	Align service development with our corporate values
20	Undertake a feasibility study to develop a Materials Recycling Facility	June 24			✓	✓	✓			✓	✓	
21	Review Bulky Waste Collections with a view to providing more collection slots and to increasing the amount of reuse of furniture and white goods.	June 24	✓	✓		✓	✓		✓			
22	Undertake a review of the council's waste infrastructure with a view to developing a business case where there are opportunities.	March 24			✓	✓	✓		✓			
23	Undertake a feasibility study on biogas and compost production	Nov 2024		✓	✓		✓				✓	

Appendix A – Current (2023) Waste Collection & Street Cleansing Services

West Northamptonshire Council currently operates a range of household waste collection services, providing residents with a convenient and reliable way to reuse, recycle or dispose of their household waste. As a new authority formed in 2021, West Northamptonshire Council has adopted the waste collection and disposal arrangements from its predecessor authorities. This means that there are some differences in the way waste is collected across West Northamptonshire.

Kerbside Collections

<p>South In House 41,800 households:</p> <ul style="list-style-type: none"> • 900 are communal • Fortnightly residual waste collections (including batteries and WEEE) • Weekly residual bag collections (for terraced) • Fortnightly Comingled DMR (including batteries and WEEE) • Weekly food • Fortnightly chargeable garden 	<p>Daventry Joint Venture 37,000 households:</p> <ul style="list-style-type: none"> • 3,200 are communal • 3 weekly residual waste collections (including batteries and WEEE) • Fortnightly Comingled DMR. • Weekly food • Fortnightly chargeable garden 	<p>Northampton Contract 100,709 households;</p> <ul style="list-style-type: none"> • 18,946 are flats • 37,187 are terraced • Fortnightly residual waste collections. • Weekly residual bag collections (for terraced) • Fortnightly Co-comingled DMR (including batteries and WEEE) • Weekly food • Fortnightly chargeable garden
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For most houses we provide wheeled bins for the collection of general household waste, mixed recycling and garden waste, which is an optional, chargeable service. Food waste caddies are provided for the weekly collection of food waste which is processed into compost like material and renewable energy. Recycling bins are collected fortnightly, and the general waste bin is collected either fortnightly or three weekly depending on location. Those who opt into the garden waste service have their bin emptied fortnightly with a one-week gap at Christmas. We also have a council-wide collection of small waste electrical and electronic equipment (WEEE) and batteries, which are sent for recycling.

As standard, we issue one black general waste bin, one blue-lidded recycling bin, one indoor food waste caddy, one outdoor caddy and one brown lidded garden bin (if subscribed to the service) per house. Extra wheeled bin capacity is available in some circumstances, for example for large families, or where there is a medical need.

In areas of high-density terraced houses, (mostly in Northampton town), there is no space to store a wheeled bin and so green sacks for general waste are provided and collected weekly. Recycling is collected in either clear plastic sacks or recycling boxes, and food waste collection services are available too. Residents can still opt into the chargeable garden waste service, and the garden waste will be collected in sacks for composting.

Most flats have large, communal bins for their general waste, located in a bin store close to the entrance to the flats. In some cases, large, communal bins are provided for mixed recycling, but not in all cases. At present no food waste is collected from flats.

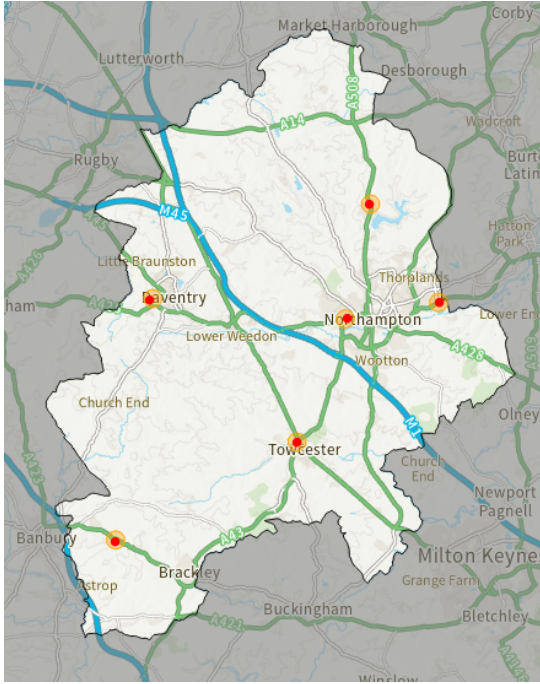
The frequency of residual waste collection currently differs across West Northamptonshire with most properties in the Northampton and South areas having a fortnightly collection and most in Daventry on a three-weekly schedule. Since its introduction in 2018, the 1,2,3 + Service in Daventry has resulted in reduced tonnages of general waste requiring treatment and disposal and increased recycling – especially food waste.

Specialist Services

Specialised collection services are also provided for other waste types such as bulky household waste (chargeable service), clinical waste and sharps.

Household Waste Recycling Centres

Our network of six Household Waste Recycling Centres (HWRCs) also form an important part of our waste collection services. Residents can bring a wider range of waste materials for reuse, recycling as well as non-recyclable waste for safe disposal at all but one site (Farthinghoe), which is for reusable or recyclable waste only.



Map showing network of 6 HWRCs in West Northamptonshire

Our residents are well served with access to HWRCs with 99 % of residents living within 10 miles (as the crow flies) of a site.

Two sites – Ecton Lane and Sixfields are licensed to accept trade waste and so businesses can bring their waste to site, have it weighed and pay for its treatment or disposal.

Sites are owned by West Northamptonshire Council but operated on our behalf by a contractor.

Our sites vary in age and size, with some being split level, allowing easy access to the skips for the various materials accepted and others using metal ramps to access the skips.

Items brought to the sites which are suitable for reuse are sold off site in all but one of the HWRCs. At Farthinghoe Reuse and Recycling Centre, only items for recycling or reuse are accepted. The items suitable for reuse are checked, tested (where necessary) put on display and sold back to members of the public, with the funds generated used for the running costs of the site.

Street Cleansing Services

West Northamptonshire Council has a statutory duty to keep ‘relevant land’ clear of litter and refuse, as far as is practicable.

To fulfill this duty and to comply with the Government’s Code of Practice on Litter and Refuse we have teams of street cleansing staff and specialist equipment deployed across West Northamptonshire, targeted in the areas where they are needed most. They undertake regular, scheduled cleansing work as well as responding to specific littering or fly-tipping incidents within an agreed timescale.

We have a network of litter bins, located in areas where litter is likely to be generated, which are emptied on a regular basis, although we also encourage our residents and visitors to take their litter home for recycling and disposal.

Resources and schedules are reviewed on a regular basis to ensure that we are making the best use of our limited resources and using them most effectively.

At present these services are delivered by three separate teams, working in Northampton, the former Daventry District area and South Northamptonshire. Over time these services will be combined into one harmonised street cleansing services for West Northamptonshire.

Appendix B – Potential opportunities to invest in waste infrastructure

Household Waste Recycling Centres

Household Waste Recycling Centres (HWRCs) are provided by the Council for residents to take their household waste for reuse, recycling and disposal, and they complement the comprehensive kerbside collection systems.

The Council currently has a network of six HWRCs, which was established decades ago and has since had limited investment to improve the facilities on site. A business case to refresh the HWRC (Household Waste Recycling Centre) infrastructure is proposed, which may result in the number and location of facilities changing in order for these facilities to better meet the needs of the growing population, improve the 'customer experience' and to promote the reuse and recycling of waste brought to the HWRCs, thereby enhancing performance of the service.

Waste Transfer Station

Waste Transfer Stations are delivery points for waste that has been collected at the kerbside in a refuse collection vehicle, where the waste is bulked prior to onward transport to a treatment facility.

Currently the Council owns waste transfer facilities in Northampton and Daventry. Refuse vehicles are relatively slow and fuel inefficient, therefore, local waste transfer stations are helpful to ensure efficient use of crew time and fuel use.

Therefore, as part of implementing the Strategy consideration should be given to developing a business case examining the financial and non-financial benefits of the Council developing a waste transfer facility in the South area.

Materials Recycling Facility

A Materials Recycling Facility (MRF) sorts the recyclables collected from West Northamptonshire's residents as part of their kerbside waste collection service, into the different material streams, prior to onward transport for reprocessing.

During Covid, when Councils nationally were collecting more recyclable materials due to changes in shopping habits and lifestyle, it became clear that limited MRF capacity was pushing processing costs for these facilities up. There is also a change in the markets for recyclables towards high quality, cleaner material to enhance the value of these materials. Therefore, the option to develop a MRF is likely to be an opportunity worth exploring further, initially by completing a feasibility study, and considering the option of working with partners.

Other Facilities

The development of other facilities has not been ruled out, but these are currently thought to offer less opportunities. However, these options, such as our own food waste treatment plant or open windrow composting site for garden waste will remain under review in case market conditions change.

Appendix C – Summary of National Waste Legislation

In the UK, waste legislation and statutory guidance is frequently subject to change.

In December 2018, the Government published its Resources and Waste Strategy for England, detailing its proposed approach for how it will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England. It was followed by a series of consultation papers on issues such as;

- a deposit return scheme for drinks bottles,
- additional responsibilities for companies who produce and use packaging material; and
- consistent waste collections across England.

The final details of these proposals are yet to be published and each of them will have an impact on how local authorities collect household waste and what waste there is to be collected and treated.

Current Key Waste Legislation

The Waste Framework Directive (2008/98/EC) sets core principles and legal frameworks for waste management in the UK. Although this is EU legislation and the UK is no longer a member state, this is still the core governing legislation which has been subsequently enacted through national legislation. It places emphasis on the waste hierarchy (prevent, reuse, recycle, recover energy, disposal), and promotes sustainability in waste management.

The Environmental Protection Act 1990 is a legislative framework covering waste collection, recycling, recovery and disposal.

The Waste (England and Wales) Regulations 2011, outline requirements for waste carriers, brokers and dealers to document and handle waste appropriately to set guidelines.

Appendix D – The Council’s Priorities and Key Strategies

The Council’s vision is to make West Northamptonshire a great place to live, work, visit and thrive and has adopted six priorities:

<p>Green and clean</p> <p>Environment and wellbeing:</p> <ul style="list-style-type: none"> • Net zero carbon by 2030 • Host a Climate summit • Increased wildlife species and more trees • Increased electric charging and energy efficiency • Vibrant towns and villages • High quality parks • Accessible green space for all 	<p>Connected communities</p> <p>Transport and connectivity:</p> <ul style="list-style-type: none"> • Improved road, rail and bus networks • Completion of major roads projects • Improved road quality • Increased use of electric vehicles and charging points • Enhanced broadband and mobile connectivity
<p>Improved life chances</p> <p>Health, Social Care and Families:</p> <ul style="list-style-type: none"> • Healthy, safe and protected Children • Increased aspirations in young people • Investment in new schools and provision • Adults supported to live independently • Care provided for those that need it • Reduced hospital stays and delays • Joined up and local services with health • Safe and secure accommodation for all 	<p>Thriving villages and towns</p> <p>Place shaping and homes:</p> <ul style="list-style-type: none"> • Regeneration of our core town centres • Safer communities with less anti-social behaviour • Flourishing and supported small business • Sustainable planning for growth • Increased affordable housing and Council homes • Raised standards of privately rented homes
<p>Economic development</p> <p>Growth and prosperity</p> <ul style="list-style-type: none"> • Published west strategic infrastructure plan • Framework for long term economic growth • Increased inward investment • Building on our rich heritage • Increased visitors to our attractions • Infrastructure benefits and investment through our role in regional forums and plans 	<p>Robust resource management</p> <p>Transparency and financial probity</p> <ul style="list-style-type: none"> • Council tax rises capped at £99 a year • Stable finances and rainy-day reserves • Robust scrutiny of spending • Open and transparent decision making • Financial prudence underpinning long term decisions and plans • Optimised debt management

[Key West Northamptonshire Council Strategies with links to waste services.](#)

	Links to Waste Services
Sustainability Strategy	<p>The Council has committed to:</p> <ul style="list-style-type: none"> • achieve Net Zero on all Council operations by 2030 and those of residents and businesses by 2045 • take a community leadership role for Sustainability in West Northamptonshire • ensure all Council strategies and policies are aligned to and contribute to the delivery of the UN Sustainable Development Goals <p>Waste Services can contribute positively to achieving the Sustainability Strategy by considering the Service’s Carbon Emissions and the alignment of the services we procure with the UN SDGs (Sustainable Development Goals).</p>
Anti-Poverty Strategy	<p>Waste Services contributes to the objectives of the anti-poverty strategy by:</p> <ul style="list-style-type: none"> • ensuring any charges for waste services are reasonable; • recovering & reselling items which have been disposed of and that are suitable for reuse; • helping residents repair broken items; and • providing resources to help residents understand how to reduce their food waste.
Live your Best Life	<p>This plan is linked with the anti-poverty strategy and has ten ambitions, which the Waste Service can help deliver by enabling West Northamptonshire to be clean and green.</p>
Place Vision	<p>The Place Vision identifies opportunity for growth in West Northamptonshire and Waste Services can facilitate this by helping to make West Northamptonshire an attractive place to live and invest in.</p>
Local Plan	<p>A new West Northamptonshire Local Plan will guide development in the area up to 2041. It is currently in development. It is important that the Resources and Waste Strategy is consistent with the Local Plan and vice versa because:</p> <ul style="list-style-type: none"> • Housing growth will determine the tonnage of waste that the Council is required to collect, and waste collection rounds will need to take into account new locations for development; • Developers will be asked to work to a set of standards to ensure provision is made for efficient waste collection and treatment for all housing types and that developers

	<p>contribute reasonable costs towards managing waste and street cleansing;</p> <ul style="list-style-type: none"> • The development of new waste facilities should be cognizant of growth areas and connectivity.
Assets Management Strategy	<p>This strategy, which is in development, will set out the principles that the Council will follow when managing, investing in and disposing of its assets. Waste facilities, including Household Waste Recycling Centres, Depots, Waste Transfer Stations are a Council assets and through the delivery of this Resources and Waste Strategy, additional facilities may be developed.</p>
Estate Climate Strategy	<p>This strategy will set out how the Council’s estate is managed to deliver net zero in operations by 2030, including large scale renewable energy deployment.</p>
Construction & Maintenance Climate Strategy	<p>This Strategy will set out how the Council’s conduct of its construction and maintenance operations will support achievement of the net zero goal, including supporting the re-use of buildings and building components, and recycling of arising at the highest practical point in the value chain.</p>
Fleet Climate Strategy	<p>This Strategy, which is at the initial stages, will consider all of the Council’s needs to move people and goods, and how this can be done in ways which support the net zero goal.</p>

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Resources and Waste Strategy Consultation - Summary and Key Findings

1. Introduction

West Northamptonshire Council was formed in April 2021 following the disaggregation of Northamptonshire County Council. It has a population of 425,725 (2021 census) with 172,643 households (2021 census).

West Northamptonshire Council is responsible for collecting all household waste and arranging for it to be recycled, treated, or disposed of. We also provide a range of special services for particular waste types such as clinical waste, commercial waste, and items of bulky household furniture.

We run a network of six household waste recycling centres (HWRCs) where members of the public can take waste for reuse, recycling, or disposal, and we are responsible for keeping streets and public open spaces free of litter and fly-tipping.

Since April 2021, we have implemented several changes to help to harmonise the waste services across West Northants as well as deliver improvements. We want to continue improving to provide fair, consistent services for residents and businesses in the area and lessen the impact waste collection, treatment and disposal has on the environment.

The Resource and Waste Strategy will set out our long-term plan and how we intend to achieve further improvements.

2. Purpose of Consultation

Some contracts procured by the previous authorities are due to expire from 2025. The requirements of the authority have changed considerably since the procurement of the current contracts for example, due to population growth (Growth area – 11.3% increase in 10 years compared with 6.2% across England), financial constraints and changes to national legislation.

This report sets out the approach taken to a public consultation completed on the Resources and Waste Strategy and provides a full breakdown of the feedback received. Recommendations are proposed and actions are noted to identify work required as an outcome of the consultation.

The consultation was open for 6 weeks from 5th July 2023 to 21st August 2023.

The consultation was open to all residents, businesses, stakeholders, and other statutory consultees who wished to have a say in the future of waste management in West Northamptonshire. The consultation was not intended as a referendum or 'decision making process'; the data gathered will be used to inform decisions about waste services.

3. Responses

In total 3316 responses to the questionnaire were received, of this 1962 were fully completed responses and 1353 were incomplete responses. Incomplete means that the respondent worked through some of the survey but did not respond to every page. Respondents were not required to complete the questionnaire fully, having the option to comment only on the areas that were important to them. When looking at total responses to individual questions, outputs shall be given in percentage/total of the number of responses to the specific question being referenced.

92% of responses were received from residents of West Northamptonshire. Responses were received from across West Northamptonshire and neighbouring authorities. Of location responses, 95% were from Northamptonshire postcodes (NN) and the remaining 5% were from areas of Leicestershire, Warwickshire, and Oxfordshire.

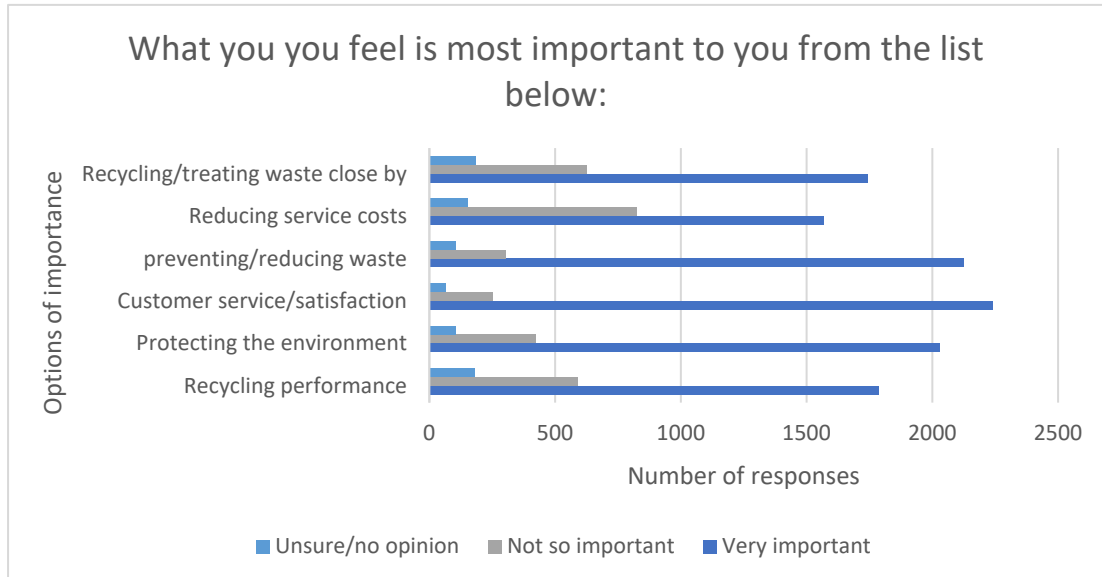
Objectives

There was general support for the vision and objectives of the Strategy. 53% of respondents were supportive of the vision and objectives, 42% neither agreed/disagreed or had an opinion, and 5% disagreed or strongly disagreed.

538 respondents made a comment on the vision and objectives of the Strategy. Of these, 5% referred to the importance of public engagement and education, 5% stated that reuse, recycling and composting should be promoted/increased, 22% of respondents mentioned the need for regular collections and a strategy to tackle fly tipping. 13% of respondents referred to the need for cleaner streets and public open spaces with the addition of more communal bins. 9% of respondents suggested more services should be built in the local area and managed in house. 4% of respondents suggested more opening days for recycling facilities, a further 4% suggested accessibility of these services should be addressed, whilst 2% commented that more responsibility should lie directly with the packaging producers and retailers.

Priorities

When asked what was most important, respondents identified reducing service costs as “not so important”, with customer service/satisfaction “most important”.

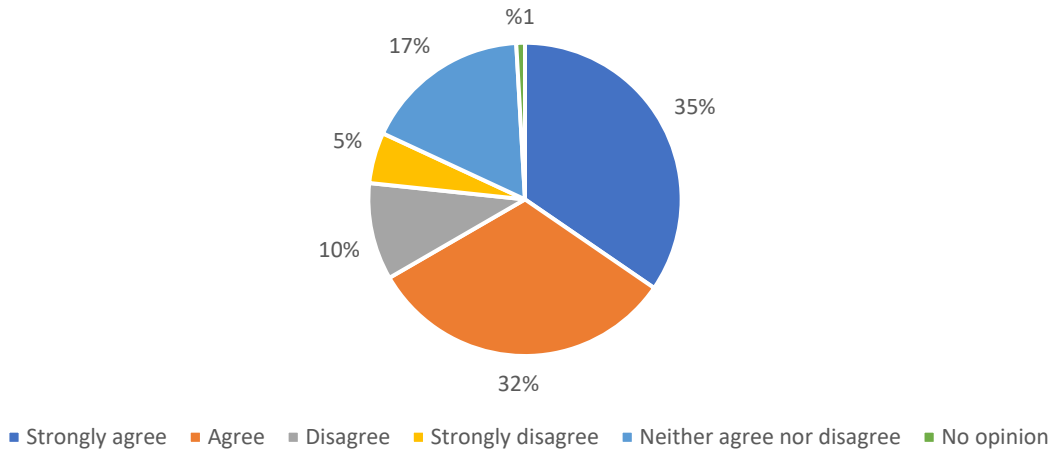


Harmonisation

67% of respondents agreed/strongly agreed that all households should have their waste collected in the same way and the same frequency.

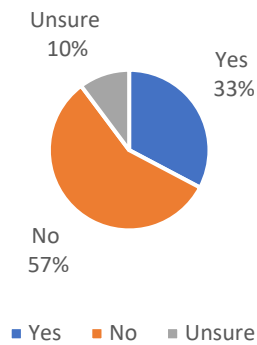
We also asked which bins were usually full by collection day. 38% of respondents said their recycling bin was full by collection, 21% said their garden waste bin was full, 16% of respondents had full food waste caddies by collection, and 21% had full non-recyclable household waste bins. 4% of respondents usually had no full bins by collection day.

To what extent do you agree or disagree that all households should have their waste collected in the same way and the same frequency?

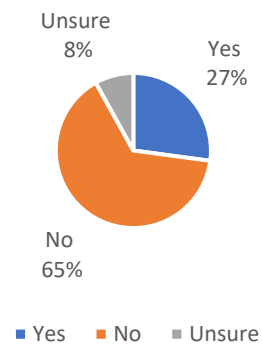


To gain further insight into how collections could be harmonised across West Northamptonshire, we asked respondents their preference on how waste should be collected, either collecting a smaller bin every 2 weeks or a larger bin collection every 3 weeks.

Downsizing household waste bin collecting every 2 weeks

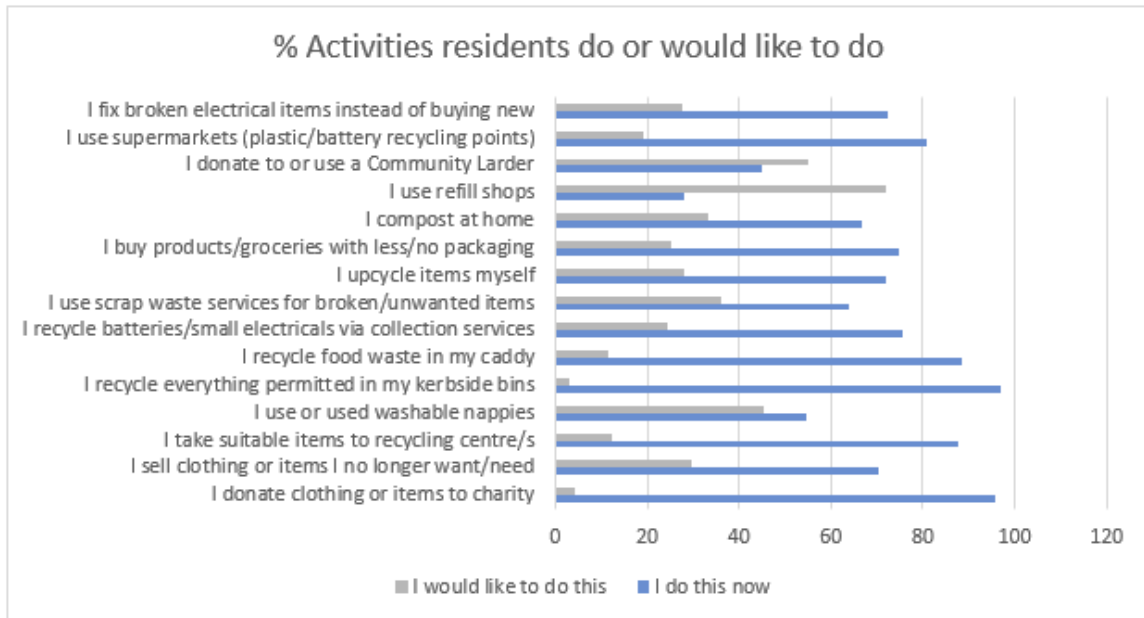


Keeping current size bin collecting every 3 weeks



Increasing recycling and waste prevention activities

In order to understand the service requirements for future service provision, we asked about our residents current recycling habits. 77% of respondents told us they currently perform various recycling activities. Of these 97% recycled all they could at the kerbside, 96% donated to charity, and 88% took items to recycling centres. Of respondents who suggested they would like to do more recycling activities in future, 72% said they would like the option to use refill shops, 36% would use scrap services in the future, and 24% would use the collection service to dispose of batteries and small electricals, buy products with less packaging, and donate to community larders.



Household Waste Recycling Centres (HWRCs)

In order to gain insight into future HWRC services, we asked several questions regarding HWRC's in West Northamptonshire.

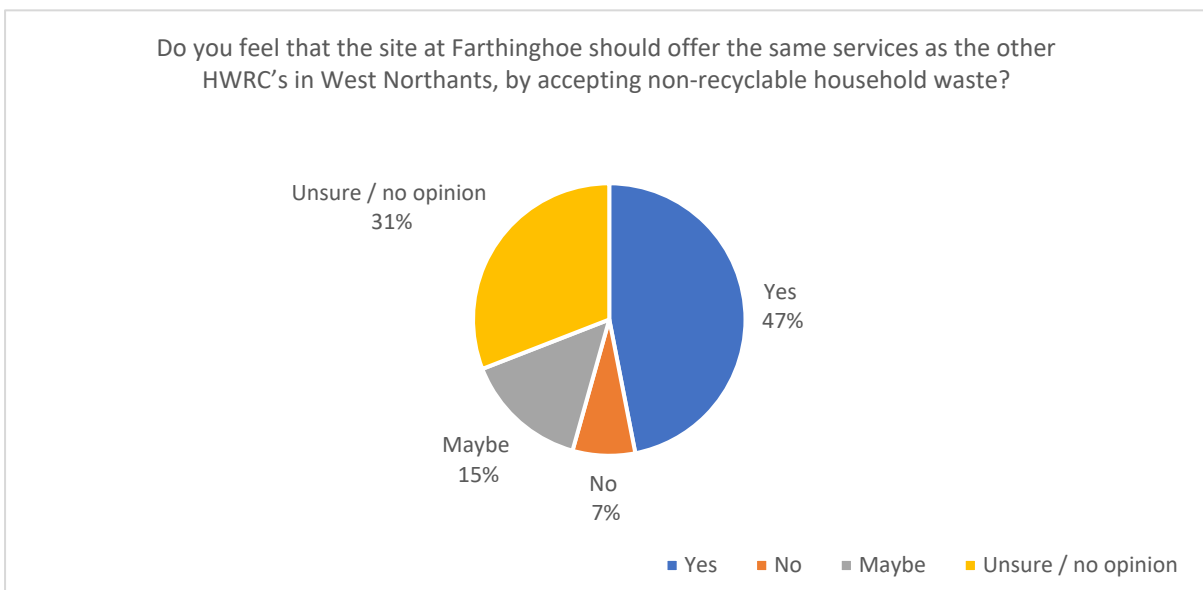
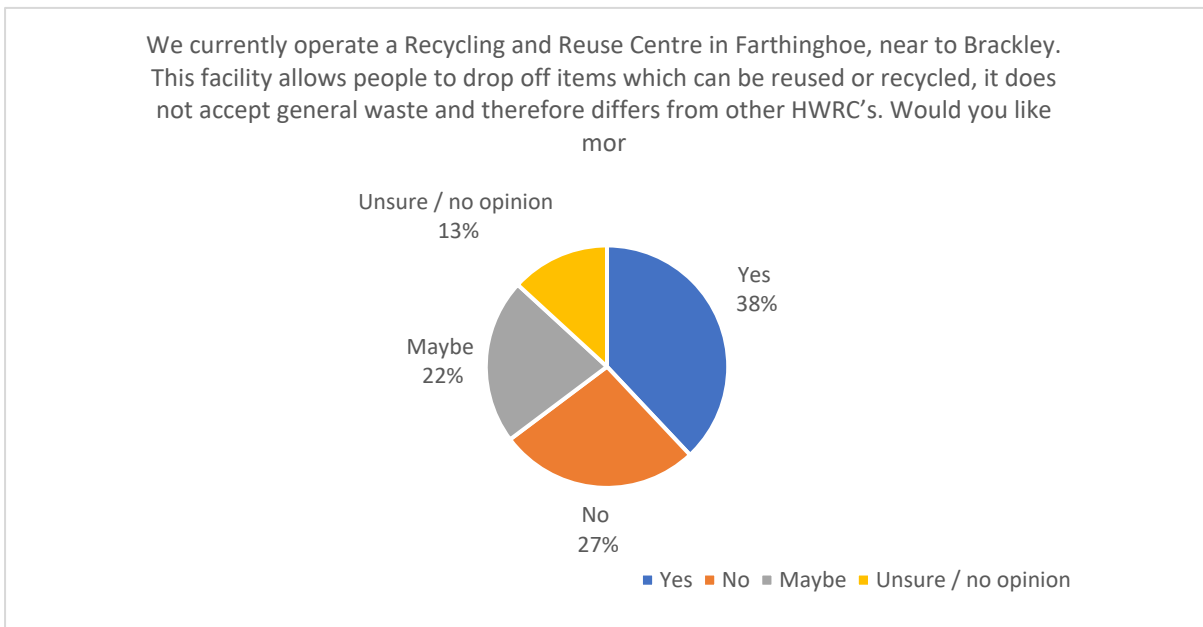
We asked if residents would like to see more reuse shops on site at HWRC's. Of those that responded 1506 (69%) said yes, 88 (4%) said no, 362 (16%) said maybe, and 240 (11%) respondents were unsure or had no opinion.

We asked if reuse shops were made available at more HWRC's, would respondents donate and buy items for re-use. 80% of respondents said they would donate items, 4% would not, and 16% might donate items. 42% of respondents would buy items for re-use, 16% would not, and 42% respondents might buy items for re-use.

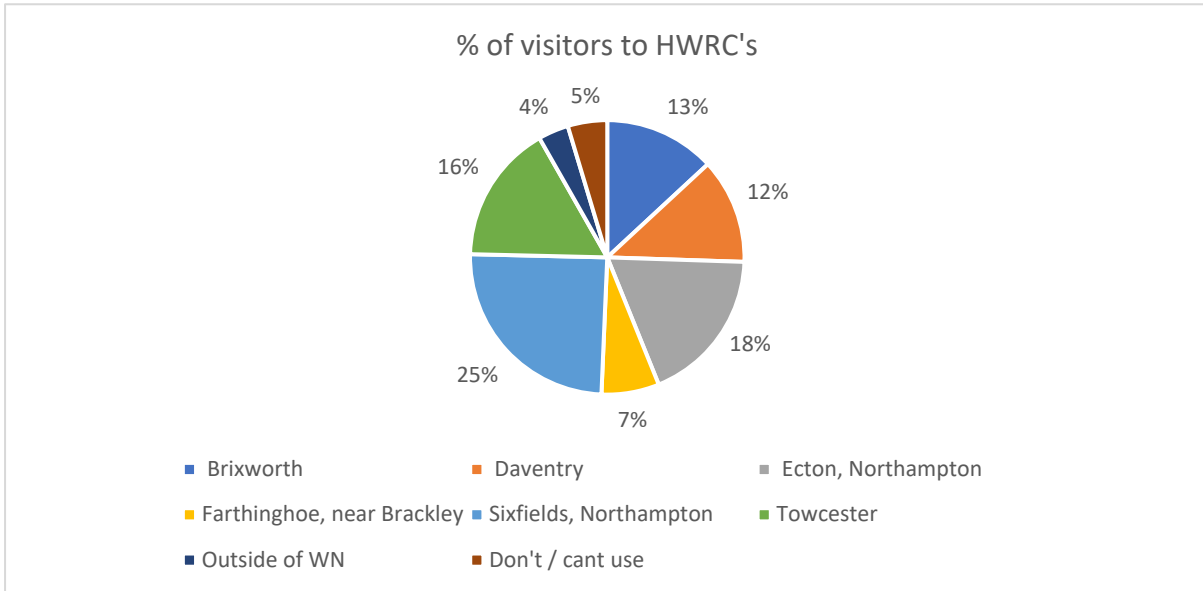
West Northamptonshire currently operate 6 Household waste recycling centres, however one (Farthinghoe near Brackley) allows people to drop off items which can be reused or recycled, and does not accept general waste, therefore differing from other HWRC's.

We asked respondents whether more of our HWRC's should operate like Farthinghoe, and whether Farthinghoe should operate like out other HWRC's and accept general waste.

The responses we received to the questions below appear to contradict each other, but can perhaps be explained because residents tend to use their local site, and may not fully understand the services that are available at different HWRCs.



We asked which HWRC's our respondents used the most. Sixfields was the most used site, gaining 25% of visits. 7% visited Farthinghoe, whilst 4% visited HWRC's outside of West Northamptonshire, and 5% did not use a HWRC at all.

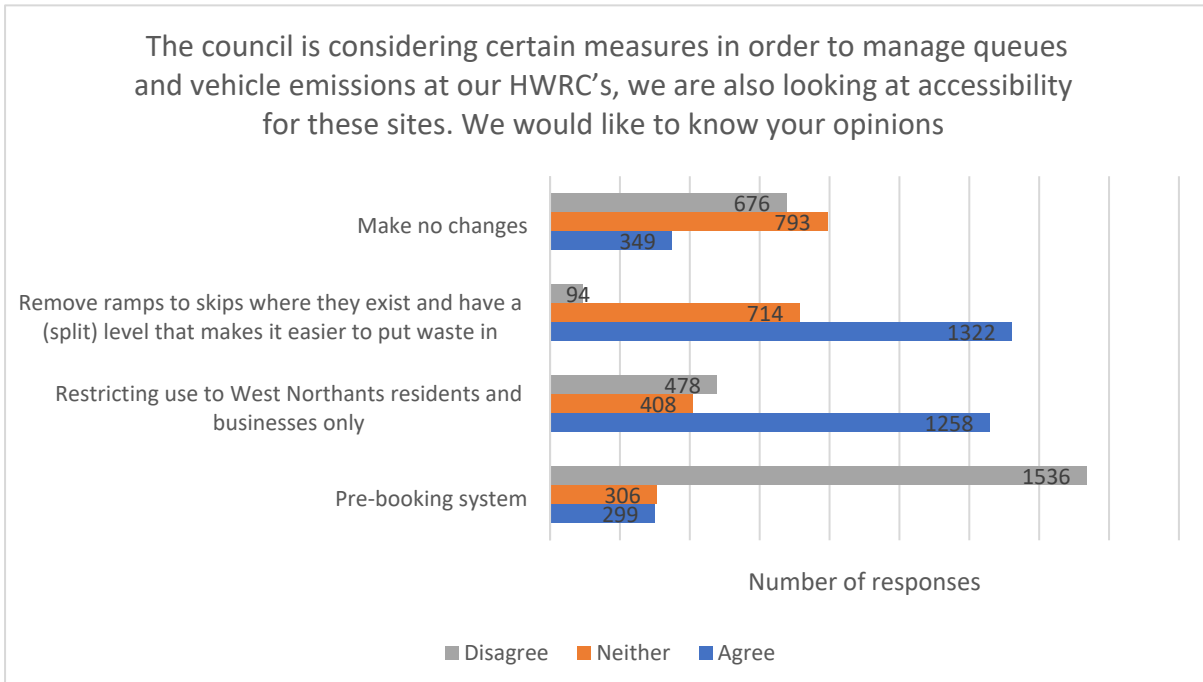


When asked how far residents travel to use a HWRC and their reasons for doing so. 1788 (86%) respondents travelled to their closest HWRC, whilst 301 (14%) travelled further than their nearest site to use one with better facilities.

To better manage queues and vehicle emissions at our HWRC's, we are also looking at accessibility for these sites. We asked to what extent residents agreed or disagreed with options being explored to help with this.

Most respondents were opposed to a booking system, however, they agreed that sites should be for West Northamptonshire's residents only?

The highest agreement response to this question related to the possibility of removing ramps and having split level facilities at all sites for ease of access.



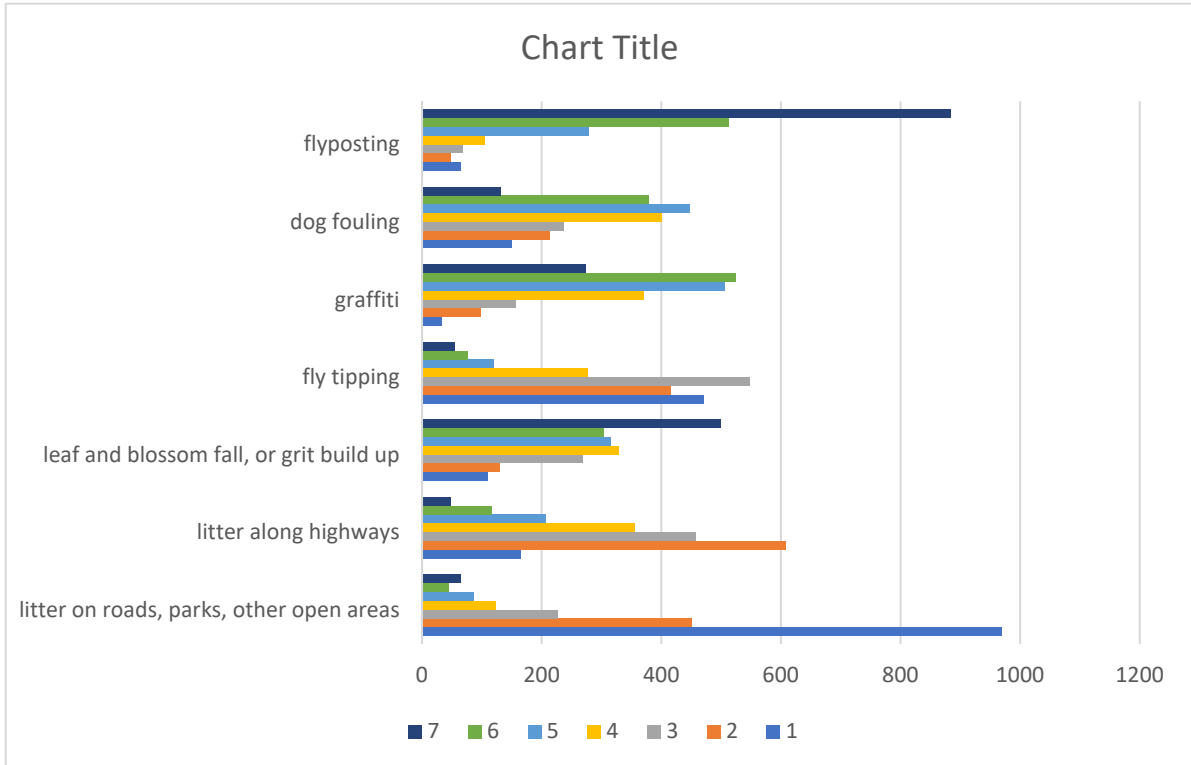
We asked if part of a booking system could be used to specify the sort of waste residents are disposing of at HWRC's, and if this could help to encourage people to sort out the waste they can, so it can be suitably separated into recycling and general waste. 58% of respondents were against a booking system, 21% agreed with booking, and 21% neither agreed/disagreed, or had no opinion.

Respondents were asked if reviewing HWRC site opening times should be considered, and what the preferred options would be. 3003 responses were received. 1304 respondents asked for sites to be open more days of the week, 587 asked for no changes (they were happy with the current provision), 546 wanted sites open later in the evenings, 453 wanted sites open earlier in the mornings, and 113 respondents had no opinion.

Street cleansing

We asked our residents, to consider the area in which they lived, and to rank by importance (1 being most important and 7 being least important) what they felt was important to them. Of these responses, most important was litter on roads, parks and other open areas with 969 number 1 (most important) rankings, followed by fly tipping with 471, litter along highways, dog fouling, leaf and blossom fall, or grit build up, flyposting and graffiti with the lowest number 1 ranking.

Flyposting was the least important of local issues gaining 883 number 7 rankings.



4. Recommendations & Actions

The vision, which forms the headlines of the Resources and Waste Strategy will remain unchanged since the overall, those who responded to the consultation agreed with it.

However, the detail of the responses to the individual consultation questions will be captured within the strategy, and particularly the associated action plan, including:

1. Improved & more frequent communications to residents to emphasise the collection services that are available, particularly:
 - a. That additional recycling can be left in a clear sack next to the recycling bin on collection days.
 - b. Bulky waste collection services are available for residents, and household waste can be taken for free to a HWRC
2. Additional emphasis on actions to prevent waste and encourage reuse, including the Council acting to enable waste prevention and reuse options.
3. Consideration of all comments and suggestions for the Household Waste Recycling Centre services when shaping the new arrangements, noting that the reuse service, operational hours and days, controls to ensure costs are minimised, and investment in the infrastructure being particularly important.
4. Increased Waste Education activity to inform residents from a young age of the importance of responsible waste actions, such as:
 - Speaking to school children about waste and recycling.
 - Increasing awareness of the reasons why it is important to reduce and recycle waste.
 - Ensuring that all residents know how to correctly take part in the recycling services provided by the council.
 - Empowering West Northamptonshire's residents to be 'responsible consumers' helping the Council to achieve its recycling targets.
5. Working with the Council's enforcement team to identify and implement effective options to reduce fly posting, dog fouling and littering.
6. Where technical language is used, documentation should be reviewed to ensure that it is easy to understand and the terminology used will be added to the text or glossary.



WEST NORTHAMPTONSHIRE COUNCIL CABINET

14 November 2023

Leader of the Council: Councillor Jonathan Nunn

Report Title	Estate and Construction & Maintenance Climate Strategies
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Report Author	Simon Bowers, Assistant Director Assets & Environment Simon.Bowers@westnorthants.gov.uk
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List of Approvers

Monitoring Officer	Catherine Whitehead	26/10/2023
Chief Finance Officer (S.151)	Martin Henry	26/10/2023
Other Director	Stuart Timmiss, Executive Director of Place, Economy & Environment	26/10/2023
Communications Lead/Head of Communications	Becky Hutson	26/10/2023

List of Appendices

Appendix A – Draft Estate Climate Strategy

Appendix B – Draft Construction & Maintenance Climate Strategy

1. Purpose of Report

1.1 To seek approval for strategies setting out the Council's approach to delivering net zero in the operation of its estate and in construction and maintenance activities.

2. Executive Summary

1.2 The Council has declared a climate emergency and set itself the goal of achieving net zero carbon in its own operations by 2030. As part of this it needs to address net zero in the operation of its estate, and in construction and maintenance activities.

- 1.3 Two strategies have therefore been produced, dealing with the different issues these areas of activity raise. The Estate Climate Strategy is focused on efficiency in energy use and on production of renewable energy, whereas the Construction & Maintenance Climate Strategy is focused on understanding and reducing emissions from construction materials and operations. Common to the strategies are arrangements for dealing with residual emissions in ways which seek to secure multiple benefits.
- 1.4 The Strategies do not form detailed business cases justifying new budgets of themselves. Rather, they provide clear directions of travel to be applied within existing budgets and to prepare business cases for new budgets. Wherever possible the focus is on saving carbon in ways which also save, or make, money for the Council.

3. Recommendations

- 3.1 It is recommended that the Cabinet:
- 3.1.1 Approves the Estate Climate Strategy, as set out at Appendix A.
- 3.1.2 Approves the Construction & Maintenance Climate Strategy, as set out at Appendix B.

4. Reason for Recommendations

- 4.1 To enable the Council to deliver on its policy of achieving net zero carbon by 2030, in respect of the operation of its estate and construction and maintenance activities.
- 4.2 To provide clear direction for the Council's staff and supply chain.
- 4.3 To maximise benefits, including financial benefits, and minimise costs.

5. Report Background

- 5.1 The Council has declared a climate emergency and set targets to achieve net zero carbon in its own operations by 2030, and for West Northamptonshire as a whole by 2045. ('Carbon' is used as shorthand for emissions of carbon dioxide and other gases implicated in global warming, measured as tonnes of carbon dioxide equivalent, CO₂e.) For these purposes, the emissions arising from the occupants of homes and business units owned by the Council but let out to others fall within the 2045 target rather than the 2030 one.
- 5.2 Alongside this the Council has adopted the United Nations Sustainable Development Goals (SDGs) to guide its wider approach to sustainability.
- 5.3 Achieving these net zero goals in the context of the SDGs requires action across the Council's operations and assets. Work is ongoing in various areas and two are now ready to make firm proposals. These relate to operation of the Council's estate, principally energy use, and construction and maintenance – how the estate is put and kept into a suitable form. Whilst these are linked, different approaches are required and therefore two strategies have been produced:

- Estate Climate Strategy.

- Construction & Maintenance Climate Strategy.

5.4 The Estate Climate Strategy provides an overview of the current operational emissions of the Council's estate, then identifies strategic steps to mitigating those emissions, and finally makes proposals for offsetting (capturing) any remaining emissions. The strategy clearly shows it is financially favourable to improve energy efficiency and produce green energy rather than have to offset it, justifying significant effort in energy efficiency and energy production. However, it is likely that some offsetting will still be needed, so the Strategy outlines an approach to delivering this.

5.5 It is noteworthy that the largest single element of the strategy, in terms of impact on carbon, is the introduction of large scale photovoltaic (solar) electricity generation. Without this it is hard to see how the net zero goal could be achieved.

5.6 The Construction & Maintenance Climate Strategy cannot provide a simple baseline, as these activities vary year by year, and the Council does not yet have emissions data from them. It therefore adopts a two-step approach:

- Identifying major areas of carbon emissions and proposing an approach to reducing those. Notably, this includes a focus on natural materials where this is practical, particularly wood, which locks up carbon taken from the atmosphere.
- A series of stages to improve the Council's understanding of carbon emissions from construction leading to pricing these into all significant projects. This is followed by estimating and offsetting emission from smaller projects where it is not practical to measure carbon.

5.7 Common to both strategies is the importance of trees and wood. In the case of the Construction & Maintenance strategy, this is to use a low-carbon, potentially carbon-negative, material. In the case of the Estate strategy, this is to use trees as a means of removing carbon from the atmosphere. They overlap in that there is potential to plant trees and use timber in construction, although this will take time to realise. A key action from both strategies is therefore to explore the business case for a productive woodland in West Northamptonshire, seeking to secure multiple benefits from it and minimising any net cost.

6. Issues and Choices

6.1 The Council could choose to adopt the strategies, or one of them, or neither of them. It could also pursue different approaches to various aspects; for example, it could focus on technological solutions for carbon removal.

6.2 Each strategy has been designed to maximise the benefits, including financial benefits, and minimise costs. They are therefore suggested to be pragmatic ways of meeting the Council's policy goals.

6.3 Other options, such as the Council investing in technological solutions for carbon removal from the atmosphere, appear unlikely to be viable at scale by 2030, and in any event to be costly and offer little in the way of collateral benefits.

- 6.4 Alternatively, the Council could focus on buying 'carbon credits' from suitable sources. However, whilst these do exist the supply is finite and, as with technological solutions, represents a pure cost rather than an opportunity for collateral benefits.
- 6.5 It is therefore recommended that the two strategies are adopted.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The Strategies are not intended to form detailed business cases justifying new budgets of themselves. This would not be practical. Rather, they provide clear directions of travel to be applied within existing budgets and to prepare business cases for new budgets. Wherever possible the focus is on saving carbon in ways which also save, or make, money for the Council.

7.2 Legal

7.2.1 The Strategies, being strategic documents, do not generally raise direct legal issues. Issues of, for example, which powers are best used to achieve certain outcomes, will be addressed on a project-by-project basis.

7.3 Risk

7.3.1 The main risks of adopting the strategies are as follows.

7.3.2 Risk 1: Delivery of aspects of the Estate strategy, notably large scale photovoltaics, may cause some concern. This will be mitigated by careful engagement with affected communities and sensitive design, including, for example, landscaping.

7.3.3 Risk 2: The costs of low-carbon measures and energy generation may not always have a positive financial case. This risk will be mitigated by focusing on projects with the best returns, and acting opportunistically where, for example, works to a building are needed in any event. Eventually the use of WNC's internal carbon price will allow the most efficient solutions to be adopted.

7.3.4 Risk 3: Delivery of low-carbon construction may, especially in the early years, increase project costs. This is likely in any significant change in construction practices. The impact should be minimised by the fact that there is a global movement in the same direction, meaning that suppliers and contractors are becoming increasingly well-equipped to provide the services at sensible costs. The move to low-carbon also offers the opportunity to reduce costs by rethinking approaches and, for example, making greater use of off-site construction with less waste and higher standards. The Council having clarity about its approach should also help its supply chain respond in positive and economical ways. Low-carbon buildings should also reduce future occupation costs.

7.3.5 The main risk of not adopting the strategies is that the Council would not have a clear direction or focus, meaning limited progress is made. The supply chain would not be engaged

opportunities to develop efficient low-carbon solutions would be lost. The net zero goal may well not be met.

7.4 Consultation and Communications

7.4.1 The Strategies will provide a clear basis on which to communicate the Council's intentions in their respective areas as it works towards delivering upon its policy of achieving net zero carbon by 2030.

7.4.2 Consultation with the supply chain will take place on the best ways of implementing the Construction & Maintenance strategy. (The issue does not really arise for the Estate Climate Strategy.)

7.5 Consideration by Overview and Scrutiny

7.5.1 None.

7.6 Climate Impact

7.6.1 The purpose of the strategies is to implement the Council's net zero goals in important areas of the Council's activity. Therefore, their impact on the climate should be wholly positive.

7.7 Community Impact

7.7.1 The approach set out in the draft strategies is designed to secure as many benefits as possible, for example looking for biodiversity and flood risk gains alongside carbon capture. Whilst some individual schemes may have, or be feared to have, some negative local impacts, the overall impact on the communities of West Northamptonshire from the package should be positive.

8. Background Papers

8.1 None.

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West
Northamptonshire
Council

Estate Climate Strategy

October 2023 v0.7 (DRAFT)



Document Version Control

Author: Energy Manager (Marouane Azennoud)
Document held by: Assets & Environment

Change History

Issue	Date	Comments
0.1	26 Sep 2023	Initial draft
0.2	13 Oct 2023	Updated draft
0.3	16 Oct 2023	Updates post ELT
0.4	17 Oct 2023	Various tidying up
0.5	19 Oct 2023	Updated background carbon calculations
0.6	20 Oct 2023	Further updates and updated usage data
0.7	3 Nov 2023	Minor revisions

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2. Introduction and approach

West Northamptonshire Council's Corporate Plan: Fresh Start Bright Future 2021-2025 provides the vision for making West Northamptonshire a great place to live, work, visit and thrive. The Corporate Plan sets out six priorities that will make West Northamptonshire a place to thrive. The priority Green and Clean, Environment & Wellbeing commits to the following objectives.

- Net zero by 2030
- Climate summit in first few months
- Increased wildlife species & more trees
- Increased electric charging & energy efficiency
- Vibrant towns & villages
- High quality parks
- Accessible green space for all

The Council declared a climate emergency and has pledged, as part of the UK100, to focus on tackling the climate emergency and reducing its carbon emissions. The pledge commits the Council to cutting its own carbon emissions to net zero by 2030 and those of residents and businesses to net zero by 2045. In delivering this objective the Council will deliver economic, and social benefits to residents, employees, and visitors.

The Council has also adopted the United Nations Sustainable Development Goals (SDGs) to provide a wider context to its sustainability efforts. The SDGs help shape the way the Council responds to the climate challenge and thus this Strategy.

The Council is seeking to embed approaches to net carbon zero across all its activities including construction, procurement, transport, highways, waste, nature, and energy management. The purpose of this strategy is to set out the context for change, the current conditions, actions required and how performance will be monitored within Assets & Environment to contribute to the overall net zero objective.

The Council also needs to improve the cost effectiveness of its operations to secure a sustainable financial position. This includes both making operational and procurement savings and generating additional income. In many cases, decarbonising WNC's estate is also an opportunity to reduce costs or generate income.

3. Scope, definitions, and exclusions

3.1 Scope of the strategy

The strategy identifies how the Council will achieve (at least) net zero carbon in its estate whilst maximising savings and income generation.

For these purposes:

'Carbon' means emissions of carbon dioxide and other gases implicated in global warming, measured as equivalent tonnage of carbon dioxide (CO₂e).

'Scope 1' emissions – direct carbon emissions, such as heating and ventilation of WNC buildings and use of fleet vehicles.

'Scope 2' emissions – indirect carbon emissions, such as grid electricity use for power and lighting, where the carbon is largely emitted at power stations.

'Scope 3' emissions – carbon emissions from WNC's supply chains, including the production of goods and services used by WNC, waste, cloud computing, and water use.

'Emissions' means all (scopes 1, 2 and 3) carbon emissions within the following headings:

- a. Consumption of electricity, gas, fuel oil, or other sources of energy used to heat, light, or provide power for operations in buildings or on open land but excluding industrial operations carried out by third parties not performing services on WNC's behalf (e.g., commercial tenants' industrial operations).
- b. Release of carbon from land due to biological, engineering, or other operations.

'Capture' means the long-term net removal of carbon from the atmosphere by biological or technical means.

'Substitution' means the provision of carbon-free electricity or other sources of energy for use by third parties.

WNC's 'estate' includes:

- a. WNC owned or occupied buildings and open land, but excluding:
 - i. Buildings where WNC only holds the freehold or superior leasehold of the land and does not own or occupy the buildings on it.
 - ii. Land or buildings held by third parties on long leases (defined for these purposes as being leases of 21 or more years in term).
- b. Buildings or open land used wholly or primarily for providing services to or on behalf of WNC even though not owned or occupied by it (the 'shadow estate').

'Net zero' means that the direct and indirect emissions of carbon from WNC's estate (see also 3.3) less carbon capture and substitution on or in WNC's estate is zero or less.

For these purposes:

- a. The purchase of 'green' energy is ignored, as it does not reflect the reality of the energy supplied. The average UK gas and electricity mix is assumed in calculations. The exception to this is where WNC is itself generating renewable energy or directly receiving renewable energy from a local facility.
- b. As information on actual energy use of WNC-owned property which is occupied by third parties is generally not available (and may reflect specific peculiarities of the occupant), typical energy use of such properties is assumed.

This strategy provides an overview of WNC's current estate carbon emissions and carbon capture and identifies how it would deliver net zero in the operations of its property estate.

The strategy identifies a list of opportunities in short, medium, and long term for:

- Reducing carbon emissions
- Carbon capture
- Generating carbon free energy on the WNC estate for use by WNC (thus reducing net emissions) or by others (substitution).
- As part of the above, savings and income generation.

It also considers identification of suitable funding, financing, and commercial arrangements to support action at scale and speed, with appropriate management of risk. Schemes to implement aspects of this strategy will need to be individually approved if not within existing budgets.

3.2 Exclusions

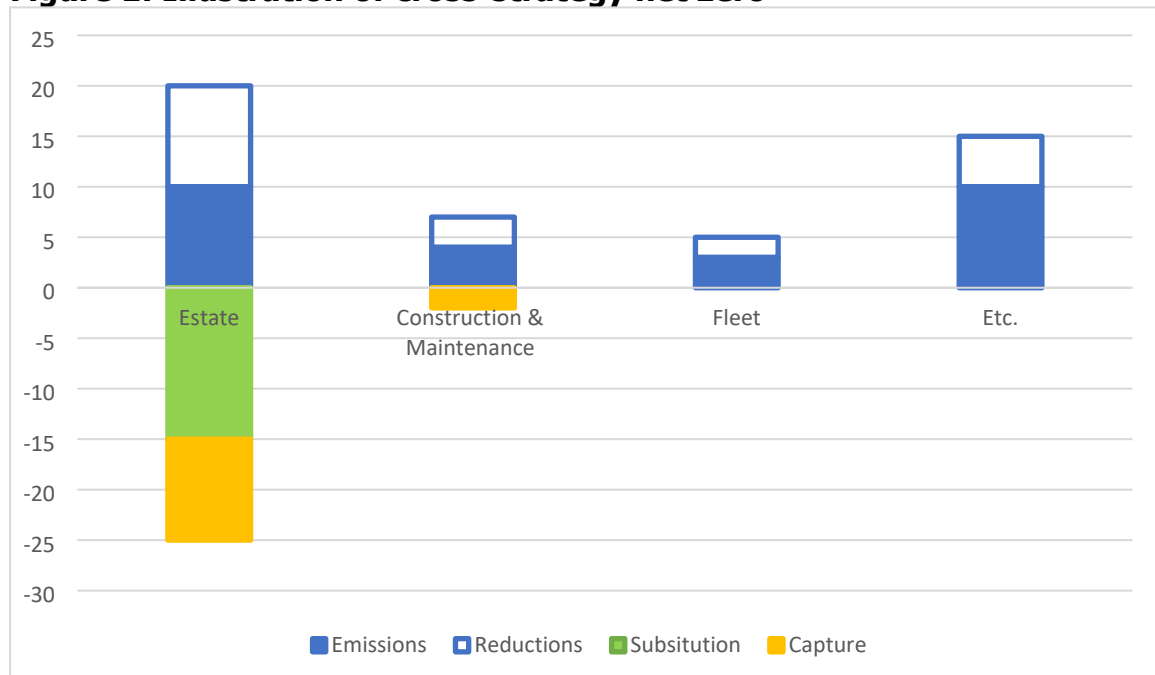
Excluded from the scope of this strategy are:

- a) Emissions from sectors of activity which have or will have their own net zero requirements.
- b) Construction & maintenance activities relating to WNC's estate (covered by their own climate strategy).

3.3 Cross-strategy implications

Where other climate strategies are unable to achieve net zero within their scope (for example, if WNC's supply chain results in net carbon emissions), these residual emissions will be treated as coming from WNC's estate. That means this strategy will set out the means of offsetting the residual carbon from all other sectors of WNC's operations. This is illustrated in Figure 1, where the illustrative total value of emissions, substitution, and capture equal zero (of course, the numbers used are not the actual figures; this is merely an illustration). Figure 1 also illustrates the importance of reduction in emissions.

Figure 1: Illustration of cross-strategy net zero



3.4 Other definitions

The following terms are also used in the strategy as defined below:

'GWh' is a gigawatt hour, that is one million kilowatt hours or the use of a traditional one bar electric fire for 114 years.

'Offsetting' is the use of carbon capture or substitution to balance emissions of carbon that WNC produces.

'PV' is photovoltaic, for solar cells, which generate electricity when sunlight falls on them.

4. Current situation

4.1 Carbon emissions

The most recent data is for financial year 2022-23. The Council recognises the emissions from business and residential occupiers of its commercial and housing stock within the 2045 net zero target, and all other emission within the 2030 target for its own operations.

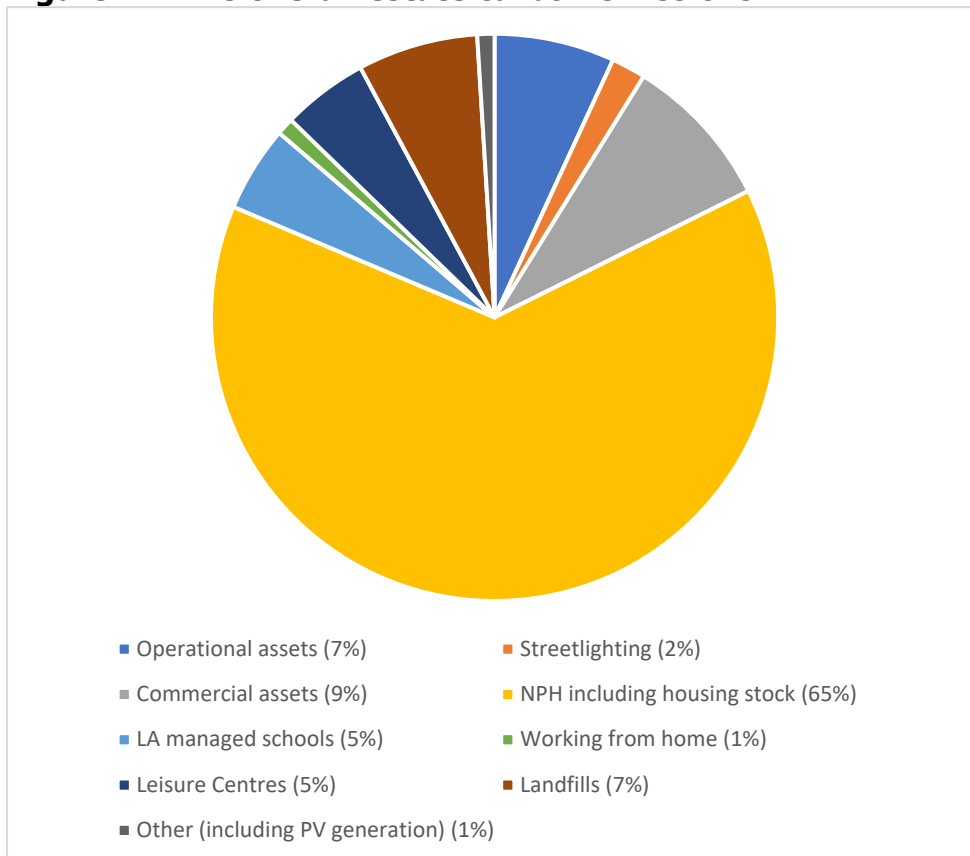
The total net emissions for WNC assets for the baseline year were 57,619 tonnes of carbon. This includes estimates for primary energy use (heating and lighting) in

Council-owned housing and commercial property. The main elements comprising this are shown in Table 1 and Figure 2.

Table 1: WNC overall carbon estate emissions

Portfolio	Emissions, tonnes carbon
Operational assets	4,178
Streetlighting	873
Commercial assets	4,902
NPH including housing stock	37,174
LA managed schools	2,621
Working from home	405
Leisure centres	3,035
Landfills	3,795
Other (including PV generation)	636
Total	57,619

Figure 2: WNC overall estate carbon emissions



WNC’s estate emitted 58,304 tonnes of carbon and saved 684 tonnes from electricity generated and exported by WNC owned PV systems. The largest emissions are from Northamptonshire Partnership Homes (NPH) (65%), commercial assets (9%), closed landfills (7%), operational assets (7%), leisure centres (5%), local authority maintained schools (5%), and street lighting (2%). The remaining portfolios’ emissions are less than 1% of the total. Some of the emissions cannot effectively be

controlled, such as the landfills. However, there is a significant potential to offset these emissions; these are presented in Section 6.

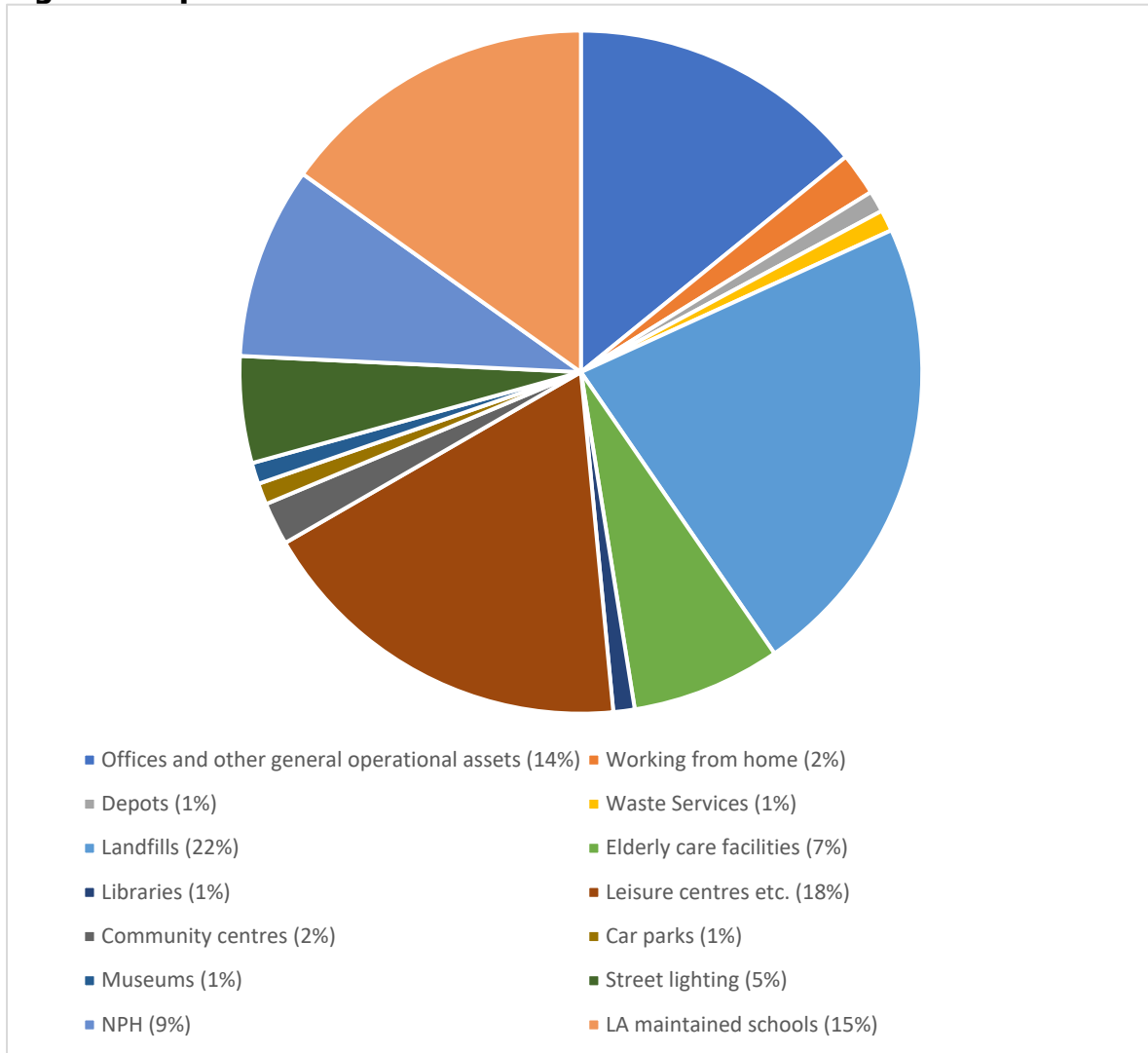
A large proportion of emissions is from assets that the Council lets to third parties, such as social houses and investment properties; together, their emissions share is around 74%. Therefore, it is essential to work with tenants to implement measures and upgrade existing energy systems to decrease the carbon emissions. The remaining WNC emissions are around 17,069 tonnes of carbon per year.

Table 2 and Figure 3 show the emissions of the Council's operational assets.

Table 2: Operational assets carbon emissions

Portfolio	Emissions, tonnes carbon
Offices and other general operational assets	2,427
Working from home	405
Depots	183
Waste Services	123
Landfills	3,795
Elderly care facilities	1188
Libraries	157
Leisure centres etc.	3,067
Community centres	393
Car parks	160
Museums	239
Street lighting	873
NPH	1,495
LA maintained schools	2,621
Other (including PV generation)	(57)
Total	17,069

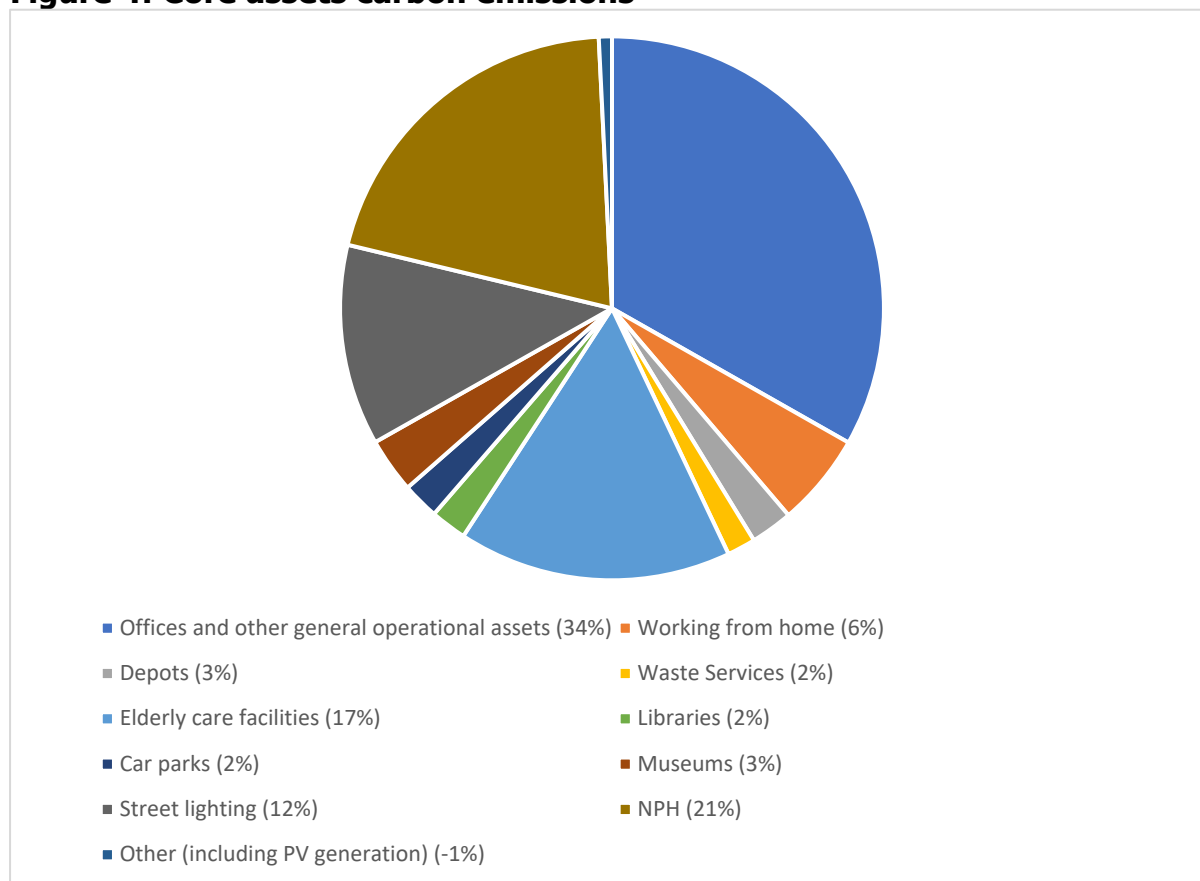
Figure 3: Operational assets carbon emissions



Finally, it is helpful to consider more closely those assets over which the Council has meaningful direct control, its 'core assets'. For these purposes closed landfills, local authority maintained schools¹, leisure centres, and community centres are excluded. This gives a focus on emissions totalling 7,194 tonnes. The results are shown in Figure 4.

¹ As schools convert to academies, they disappear from the Council's carbon emissions without any 'real world' changes occurring. It is thus helpful to remove this artificial effect.

Figure 4: Core assets carbon emissions



For the core assets, emissions from offices, NPH non-dwelling estate, and elderly persons’ facilities constitute a significant majority. This means that these are logical areas of focus for energy efficiency and carbon reduction measures.

Below are presented proposals and action plans to mitigate, decrease and offset carbon emissions. The proposed schemes and interventions will require a number of years to be implemented, whilst reaching the 2030 target. In the meantime, however, to support the Council’s efforts to decrease emissions and to lead by example, the Council approved purchasing renewable electricity and gas in 2021. This is a temporary measure that comes as close as possible to having the energy consumed by assets and street lighting being net zero while the Council is working on the actions plans presented in this document.

4.2 Estate energy use

The Council’s annual electricity and gas usage in 2022/23 is set out in Table 3. Some of this usage was directly incurred by the Council and other usage was by contractors acting on the Council’s behalf. This means the emissions fell across scopes 1, 2, and 3.

Table 3: Typical WNC annual electricity and gas usage

Area	GWh
Estate electricity	9.0

Area	GWh
Leisure centre electricity	3.3
Street lighting electricity	4.5
NPH direct electricity	2.1
Estate gas	13.2
Leisure centre gas	13.1
NPH gas	6.0
Total	51.2

The total cost of these supplies purchased by WNC directly (estate and street lighting) in 2022/23 was around £8 million. Whilst the Council’s participation in the LASER buying consortium assists, these costs have risen significantly due to global energy prices rising strongly following recovery from the Covid-19 pandemic, the war in Ukraine and other factors. Although the prices have started stabilising, they are still at historic highs; in 2021/22 the cost of these supplies was around £5 million.

5. Objective, aims, and approach

5.1 Overview

Delivering net zero in the Council’s estate cannot be divorced from its wider policy goals, including to sustainability in the round. Accordingly, objective and aims of the Estate Climate Strategy are as follows:

Objective: To reach net zero for the Council’s estate by 2030, in ways which support efficient and effective working whilst maximising savings and income generation.

Aims: To...

- a) Maximise overall benefits, by seeking solutions which deliver against WNC’s wider objectives including those defined in its social value policy.
- b) Maximise efficiency, by using the pressure of net zero to focus attention on efficient shape and use of WNC’s estate.
- c) Generate a high degree of sustainable energy locally, enabling an effective reduction in the cost of energy to WNC.
- d) Use offsetting to achieve net zero only where there is not otherwise a practical or economic solution, or the offsetting delivers wider benefits (such as biodiversity gain).

5.2 Approaches

To reach net zero, the Council has four main approaches. These complement each other and all will be required. These approaches are:

- a) Estate rationalisation: this entails reviewing Council assets to ensure they are used effectively, repurposed, redeveloped, or disposed of.
- b) Efficiency measures: interventions that will transform WNC assets to become energy efficient. This results in decreasing energy consumption and thus decreasing carbon emissions. Eventually, there will be a point where efficiency has been optimised and energy consumption cannot be reduced further.
- c) Local sustainable energy generation, notably through PV systems but other approaches may also be applicable.
- d) Carbon capture, this is achieved through activities such as tree planting.

The strategy excludes artificial measures which appear to reduce WNC's emissions by transferring assets to others without managing the underlying issues. The strategy links to other strategies and supports where practical WNC's other Corporate Plan goals.

6. Strategic actions

6.1 Estate optimisation

The Council has inherited a large portfolio of assets from the predecessor councils. In some cases, some of these assets are not utilised to their full potential; this means that resources are wasted which leads to unnecessary costs and carbon emissions.

Work is therefore already underway to reshape the Council's estate to focus on the needs of the organisation (including its partners such as NPH and Northamptonshire Children's Trust, NCT). This includes the Office Optimisation project. Data on building energy efficiency is one of the drivers of decisions on the future of the Council's estate.

The Council will:

- a) Continue to pursue optimisation of its operational estate, seeking to provide fit for purpose, energy efficient property to support service needs², and disposing (by freehold or leasehold, as appropriate) of property which is not required.
- b) Optimise its commercial estate, seeking a balance of supporting local economic development and income generation whilst improving the energy efficiency of the overall estate and meeting regulatory requirements.

² In some cases, the service need is the preservation and productive use of heritage assets. In these cases, disposal is not the intended outcome, and there is a limit to the degree that such assets can become energy efficient. This one of the drivers of the need for offsetting.

- c) Identify its shadow estate and consider how best to optimise this.
- d) Continue to use data on energy efficiency to support decisions on estate strategy.

6.2 Carbon saving opportunities

There are a range of solutions that the Council can implement to decrease the energy consumption in buildings. Some require small interventions and provide quick paybacks; these are often described as 'low hanging fruit'. Lighting upgrade to LED is one of these, it can save around one third of the electricity consumption of the building and the payback is on average around three years. There are more complex interventions that can lead to service disruptions, they require significant capital investments and have longer paybacks. Heating decarbonisation is a key example, typically achieved by upgrading heating from gas to electrically-powered heat pumps. In order to decide on interventions, the Council will follow the process set out in the following sections.

6.3 Review and prioritisation of sites

The Council has a large number of assets. Therefore, interventions need to be prioritised, with the aim being to address those which present the greatest opportunity for carbon and cost saving first. Assets will be reviewed to identify which ones need to be prioritised. The review will take into consideration three aspects:

- a) Expected future use of the asset and business need (see 6.1).
- b) Current energy consumption on a unit area (kWh/m²) and per occupant. This allows a comparison between assets based on their energy consumption.
- c) Whether there is a tactical opportunity. For example, if a building requires refurbishment or a new heating system in any event, making the cost of installing PV, or a low-carbon heating system, less expensive.

Following this review, assets will be ranked and added to the programme. The programme will be reviewed regularly to ensure that it is up to date.

6.4 Decarbonisation reports

Decarbonisation reports will be commissioned for assets identified as high priority in the rankings. The site plans, asset records, maintenance records, and energy consumption will be reviewed. This will be followed by a survey of the asset to investigate the energy systems, equipment, the building fabric, and opportunities to generate energy on site. The collected data will be analysed, and a list of decarbonisation interventions will be proposed with their costings, payback periods, and financial, energy, and carbon savings.

The data collected is essential to support applications for funding from external decarbonisation funds e.g., the Public Sector Decarbonisation Fund, as well as to make informed decisions about investment of WNC's own funds.

6.5 Decarbonisation interventions

6.5.1 Building lighting upgrade to LED

Upgrading lighting to LED typically results in large electricity savings and is one of the 'low hanging fruit' as the payback periods are very short, and the upgrade works are not generally complex, intrusive or disruptive. Depending on the existing lighting stock in a building and the operational hours upgrading the lighting to LED can result in electricity savings of between 25% to 70%. As an example, libraries not using electric heating tend only to have low electricity consuming equipment such as computers and printers. Therefore, most of their electricity is consumed by lighting and upgrading it to LED will typically lead to a decrease of building electricity consumption of around 50% to 70%.

LED lighting also has a further benefit, in that because it is more efficient more of the electricity is converted into light rather than heat. In the summer this can materially improve building comfort by reducing heating where lights need to be on.

Given these benefits, the objective is that all WNC assets should have LED lighting by 2030. The Council will continue its programme of replacing lighting units with LED ones.

6.5.2 Street lighting and traffic signs and signals update to LED

Upgrading street lighting and traffic signals to LED offers similar energy benefits to the use of LED lighting in other situations. The Council has a project to upgrade its street lighting. This will continue and be applied to traffic signs and signals.

6.5.3 Heating decarbonisation

This intervention is complex as it includes different measures that can be intrusive to our buildings and can cause disruptions to operations. However, heating is a major energy use and therefore needs to be addressed.

Firstly, a building survey will be undertaken to verify the quality of its thermal insulation. This will determine whether there is excessive heat escaping from the building. Good insulation helps with decreasing heat losses, reducing energy consumption and enabling the heating system to be optimised and not having to implement a larger sized heating system than necessary. If the survey identifies excessive heat losses, suitable solutions will be designed. These can include insulation of walls, ceilings, floors, and pipes, and upgrading windows or doors or their casements to removal thermal bridges. Some of these schemes have long payback periods (exceeding 20 years), which may mean other interventions should have higher priority.

Once the thermal insulation of the building has been addressed, the next step is to investigate the heating system and see if it is practical to switch to a low carbon

solution such as heat pumps. Heat pumps are much more efficient because whilst they use energy, most of the heat they provide has been extracted from the environment – typically from the air, a watercourse or water body, or from the ground. Most of the Council’s properties have gas heating systems and a small number have oil heating or direct electric systems. A small but increasing number have been moved to heat pumps.

Switching from gas or oil heating to heat pumps is not simple as there are many factors that needs to be taken into consideration such as the type of the building, availability of outdoor areas to install the new system, proximity to other buildings as some of these systems produce noise, type of works needed, the state of the existing heating infrastructure such as heat exchangers, heat emitters, pipes, etc. There are instances where a simple change from a gas boiler to an air source heat pump can be enough, but there are instances where the whole heating infrastructure (including heat exchangers, pipes, and emitters (radiators)) needs to be upgraded. Also, there are instance where the low heating carbon solution is not sufficient on its own and has to be combined with a direct heating system that can be used for topping up the heating during extreme cold periods, which may arise for just a few days in a year.

While the aim is generally to decarbonise the heating by 2030, there is a need to balance the investment – financial and carbon – needed to replace a heating system with the financial and carbon savings from operation of a new system. Generally, it is preferable to replace heating systems as they approach their end of life. This may mean that some offsetting remains required in 2030 and beyond.

Using heat pumps will not fully decarbonise heating unless the electricity used to run the pump is from a renewable source. Therefore, providing PV systems is a helpful complement. As electricity is, per unit of power (e.g., kWh) typically around three times the price of gas, a heat pump has to have a coefficient of performance³ of 3 in order to make the energy cost comparable. Sometimes this can mean a heat pump installation increases rather than decreases costs. Council owned PV systems are way of avoiding this problem by providing electricity at lower costs.

The Council will pursue heating decarbonisation schemes where these are, at least, overall cost neutral, and will prioritise those which deliver financial savings. This will include seeking external funding such as from the Public Sector Decarbonisation Scheme.

6.5.4 Small scale renewable energy systems

For these purposes, a ‘small scale’ renewable energy system is one which can be installed on a building or other structure. Often these do not require planning

³ The coefficient of performance or COP is the ratio of energy used by a heat pump to the heat energy emitted by it. For example, a COP of 3 means that for each 1 kWh of electricity used, 3 kWh of heat energy is emitted.

permission and because the amount of power generated is relatively small, securing grid connections for export of electricity is generally relatively easy.

Such systems will be most financially attractive when they cover the load of the building they are on, or other facilities which can be connected by 'private wire'. This is because the export price⁴ to the public electricity grid is much lower (typically around one-fifth) than the input price. Schemes working on this basis typically have a payback period of five to six years. However, this does not rule out systems which generate more than the relevant base load, provided the financial case is still worthwhile.

Where systems are installed on, or with access to, car parks, there is the potential to link them to electric vehicle (EV) charging (the Council has a project to deliver large scale EV charging underway). This offers the opportunity to use the generated power effectively, perhaps enhanced by offering lower charging prices when renewable energy is plentiful.

These renewable generation schemes are currently PV based, but advances in design are now producing small-scale wind generators, some of which form combined systems with PV. This has the benefit of increasing overall electricity production and generating power over a wider range of weather conditions.

As with the schemes described above, the first step is to review the future of the asset. The second step is to analyse the electricity consumption to identify consumption patterns and the base load. This is followed by design and costing. A business case can then be developed to apply for capital funding.

Under this strategy, the Council's portfolio of buildings has been reviewed and appropriate assets identified. There is a potential of generating 2,184 MWh of PV electricity annually. This would lead to reducing annual carbon emissions by 553 tonnes (about 1% of WNC's overall net carbon emissions, but about 5% of its annual gas and electricity power consumption). There is currently a live project at One Angel Square. This site has been prioritised as it is one of the highest consuming sites with a high base load. The asset already has a 150kWp PV system, but it only generates around 15% of the yearly demand; the new system will enhance this significantly.

The Council will:

- a) Pursue a programme of small-scale renewable energy generation on buildings and other structures it controls, favouring the most financially attractive sites first.
- b) Seek to link local renewable generation with EV charging facilities.
- c) Explore the potential of, and if appropriate implement, small-scale renewable generation beyond PV.

⁴ The export and import prices are often referred to as export and import tariffs.

6.5.5 Large scale PV systems

It is also possible to deploy PV at larger scales, and it will be necessary to do this if the local renewable generation is to make a substantial impact on the Council's carbon emissions. For this type of intervention, there is a need for large pieces of land or very large roofs. Unlike small scale renewable projects, large scale PV requires detailed feasibility studies that assess various aspects such as environmental impact, electricity grid restrictions, flood zones, and other factors. They all require planning applications and applications for grid connection to the distribution network operator (DNO). This means that it can take a number of years to build and commission a large-scale PV installation.

The Council is working on a programme of large scale PV generation, using land and facilities it owns, and potentially also acquiring sites. The aim is to fully offset the Council's gas and electricity demand. Based on Table 1, this implies a target of 50GWh per year generating capacity, saving around 10,140 tonnes of carbon per year. Together with the small scale schemes in 6.5.4 this would effectively eliminate WNC's fuel and power carbon emissions. The larger sites may include battery storage or potentially green hydrogen⁵ generation to better match supply and demand for power.

Currently sites likely to deliver around 40GWh per year have been identified as reasonably likely to be deliverable. A small number of additional schemes will therefore be necessary to meet the aim.

The Council will:

- a) Continue to pursue a programme of large scale PV systems, seeking to achieve 50GWh per year of electricity production and financial benefits whilst taking into account other environmental and social factors.
- b) Explore and where financially attractive implement battery storage, green hydrogen production, or other mechanisms to match supply and demand for power at large scale PV sites.

6.5.6 Grown biofuels

Biofuels are considered as zero emissions fuels as the carbon emitted when they are burned has recently been taken from the atmosphere. They are produced from the fermentation of sugars, starch, or cellulose or by directly burning fuel pellets. These could be extracted from plants harvested on Council owned lands. Building a dedicated facility to transform harvested plants to biofuel is unlikely to be feasible as the quantity to be harvested on the Council's land would not be large enough. However, the Council could still recognise carbon benefits, claim carbon credits, and make money from the harvested plants sold to transformation facilities.

⁵ The ways of generating hydrogen are classified by colour. Green hydrogen is generated using renewable electricity.

Nine sites have been identified as having potential for this intervention and a type of plant, Miscanthus, has been selected for evaluation. This is a plant widely used in the UK for producing biofuels. The annual potential production is 730 tonnes and carbon savings would be 33 tonnes of carbon.

The Council has a limited number of assets that can be dedicated for carbon offsetting strategies. More generally, there are many competing uses for land. It is therefore essential to identify which interventions need to be prioritised. Table 4 compares between the potential savings from large scale PV and harvesting Miscanthus in an area of land.

Table 4: Comparison between large scale PV and biofuel production

Annual production per Ha	Type of production	Capital cost⁶, £k	Income generated, £k	Carbon savings, tonnes	Payback period
592 MWh	Electricity	626	95	150	6.6
13.99 tonnes	Plant harvest	2	1	1	3.2

As it can be seen from Table 2, harvesting Miscanthus can be a cheap solution with a short payback period. However, it does not have potential to generate large income streams for the Council or reduce the emissions significantly.

Therefore, it is recommended to focus land use for energy production on large scale PV. If this is not possible, then it may make sense to invest in harvesting Miscanthus or other plants that can be processed to produce biofuels.

The Council will therefore investigate the production of plant inputs for biofuels if it appears land cannot be used for PV and the production of biofuel feedstocks is overall the most beneficial use of the land.

6.5.7 Biogas from organic waste

The Council is the recipient of large amounts of organic waste, in the form of garden and kitchen waste. This material can in principle be used to generate biogas, which when cleaned of unsuitable components can be used as vehicle fuel or provided as 'green gas' into the gas grid. Such gas would therefore either reduce the Council's own road vehicle carbon emissions or, if provided to others, qualify as substitution.

As part of its Resources and Waste Strategy, the Council will explore whether biogas production would be financially viable and environmentally beneficial.

6.5.8 Responsible behaviour

Whilst it will not remove the need for major actions as detailed above, it will also be important to reinforce patterns of behaviour among those working for the Council, so that energy usage is not unnecessarily high. Actions may include:

⁶ Does not include land value.

- a) Regular messaging in corporate communications.
- b) Seasonal campaigns such as 'net zero' week.
- c) Material in induction package for new starters.
- d) Enhanced mandatory learning courses.

6.6 Carbon offsetting

6.6.1 Introduction

Once the measures described above have been implemented, it is likely – especially bearing in mind the Council's estate carbon emissions are deemed to include the residual emissions from all other areas of its functioning, see 3.3 – that offsetting will be required. Offsetting by substitution is covered in sections 6.5.4 and 6.5.5, and potentially in 6.5.6 and 6.5.7. The focus here, therefore, is on carbon capture.

It is unlikely that carbon capture by technological means would be attractive to the Council, even if suitable technologies were sufficiently well developed in the period. They are likely to run at significant costs and generate no or limited ancillary benefits. Therefore, natural means of carbon capture are the focus.

6.6.2 Tree planting

The most obvious means of capturing carbon is the planting and ensuring the subsequent growth of trees. The structure of a tree is largely made of carbon captured from the atmosphere. This applies as long as a tree lives, or if felled and the timber is used for a purpose where it remains intact, for example in construction or making furniture.

The Forestry Commission provides estimates⁷ of carbon capture from tree planting over 30 years, ranging from 257 tonnes per hectare (Ha) for thinned broadleaf woodland to 310 tonnes for a managed mixed conifer woodland. Whilst these the capture rate will not be linear, this gives an average annual capture rate per Ha of 8.6 to 10.3 tonnes. Thus, using 10 tonnes per Ha per year, to offset the Council's current core emissions (only) would require in the order of 719Ha (1,778 acres; 0.5% of the area of West Northamptonshire) at a cost of around £17.8m. Planting one Ha is likely to cost in the order of £1,820 per Ha⁸, giving a total planting cost of around £1.3m, and thus a total cost of around £19.1m.

It is stressed that the above is not intended outcome. Rather, it illustrates the importance of reducing emissions by other means, and of renewable energy production. Nonetheless, new tree planting is likely to be an important means of dealing with some residual emissions.

⁷ [Responding to the climate emergency with new trees and woodlands, Forestry Commission \(accessed 13 October 2023\)](#)

⁸ [Morewoods, Woodland Trust \(accessed 13 October 2023\)](#)

Over 30 years 762 Ha of new woodland would have captured 236,000 tonnes of carbon. Based simply on land and planting cost, with no consideration for ongoing costs such as maintenance or income, this gives a price per tonne of carbon captured of around £86. This per-tonne price should be broadly similar at a smaller or larger scale.

It is also important that some tree planting starts as soon as possible, as early years of tree growth will produce less carbon capture than the established trees as they continue to grow.

6.6.3 Woodland: a productive approach

Given the costs of carbon capture through tree planting, it makes sense for the Council to seek multiple benefits through strategic choice of planting sites and seeking combined benefits on them. In addition to carbon capture, these could include:

- Biodiversity gain. This would include potentially allowing the Council to sell biodiversity net gain credits to other developers, or use them itself.
- Public access and enjoyment. Whilst public access needs to be managed, the Forestry Commission has shown it is possible to combine public access with productive woodland.
- Flood risk mitigation. Suitable location(s) may allow the woodland to slow the passage of water and cause some of it to be absorbed into the land or be taken up by the trees, thus reducing flood risk downstream.
- Production of wood for use in furniture and construction. Whilst it is likely to be some decades before trees are ready for use in structural building components, smaller elements such as shingles or fence posts may be available sooner, as would those for use in furniture.

Productive use of the woodland is particularly valuable as it allows the same land to be used repeatedly to capture carbon, which is then locked up in buildings, other structures, furniture, and other wooden items.

Creation of local productive woodland will need its own business case, demonstrating that it is viable and cost-effective. The aim would be to substantially reduce the net cost through the combined benefits. Additionally, grants are often available to support tree planting; these would be sought wherever suitable.

The Council will:

- a) Prepare a business case for productive woodland.
- b) Seek to create new woodland as soon as possible, so that impact on carbon capture is being delivered by 2030.
- c) Seek grants and other external funding for tree planting.

This work will be done in alignment with work on the Council's Tree Policy & Strategy and Local Nature Recovery Strategy.

6.6.4 Other organic capture

There are other actions that the Council can take to remove carbon from the atmosphere through interventions in soil management and other types of vegetation growth. These will be considered as part of work on the forthcoming Local Nature Recovery Strategy.

6.6.5 Carbon price

It will be necessary across the WNC group to set an internal carbon price, so that the Council can decide when to prevent carbon being emitted and when to offset on a balanced and cost-effective basis. This carbon price will be based on the cost to the Council of creating and managing its highest-cost carbon offsetting measures (because it is those which would not be incurred if the carbon in question was not emitted). These will probably be those involved in tree planting (6.6.2, 6.6.3) or potentially other organic capture (6.6.4). However, if the Council is unable to fully offset its carbon emissions internally, the internal price will need to reflect the cost of purchasing carbon credits externally.

7. Conclusions

The main outcomes of this strategy should be:

- The ability of the WNC group to deliver on the 2030 net zero target in practical and cost-effective ways.
- Maximised wider benefits from carbon reduction and offsetting work.
- Enhanced awareness and cultural change in which everyone takes responsibility for decarbonisation.

8. Review

This strategy and action plan will be subject to annual review. If changes to the Strategy appear to be merited, they will be prepared and submitted for approval in the usual way.

Appendix A: Estate Climate Strategy Action Plan

This section sets out our ongoing carbon reduction activities for WNC. This plan will undergo regular review and refinement as part of the overall management review cycle. The abbreviations for service areas are 'A&E' for Assets & Environment, 'HR' for Human Resources, 'HW' for Highways, 'WS' for Waste.

No.	Service areas	Source	Action	Target delivery date	Resources
1.	A&E	6.1(a), (d)	Optimisation of operational estate	Ongoing	Staff time, consultancy costs
2.	A&E	6.1(b), (d)	Optimisation of commercial estate	Ongoing	Staff time, consultancy costs
3.	A&E, commissioning services	6.1(c)	Identification of shadow estate	2024	Staff time
4.	A&E, commissioning services	6.1(c), (d)	Optimisation of shadow estate	Ongoing	Staff time, consultancy costs
5.	A&E	6.3	Review and update programme of property priorities for decarbonisation	Every six months	Staff time
6.	A&E	6.4	Preparation of decarbonisation reports and funding submissions	Ongoing	Staff time, consultancy costs
7.	A&E	6.5.1	Programme of LED lighting replacement	Ongoing to 2030	Staff time, scheme costs
8.	HW	6.5.2	Programme of street lighting and traffic signs and signals upgrade to LED	Ongoing to 2030	Staff time, scheme costs
9.	A&E	6.5.3	Programme of building heat decarbonisation	Ongoing to 2030	Staff time, consultancy costs, scheme costs
10.	A&E	6.5.4	Programme of small scale renewable electricity generation, linked to EV charging where appropriate.	Ongoing to 2030	Staff time, scheme costs
11.	A&E	6.5.5	Programme of large scale PV, including battery storage etc. where financially attractive.	Ongoing to 2030	Staff time, consultancy costs, scheme costs
12.	A&E	6.5.6	If applicable and the optimal use of land, investigate production of plants for biofuel manufacture.	Ongoing to 2030	Staff time, scheme costs

No.	Service areas	Source	Action	Target delivery date	Resources
13.	WS, A&E	6.5.7	Assessment of whether biogas production from organic waste would be worthwhile (linked to Resources and Waste Strategy).	2024	Staff time, consultancy costs
14.	A&E, HR	6.5.8	Development and implementation of programmes to encourage carbon responsible behaviour	2024 and ongoing	Staff time
15.	A&E	6.6.3(a)	Developing business case for West Northamptonshire productive woodland.	2025	Staff time, potential consultancy costs
16.	A&E	6.6.3(b)	Identify opportunities for early tree planting	2024	Staff time, land purchase and planting costs
17.	A&E	6.6.3(c)	Seek grants and other external funding for tree planting	Ongoing	Staff time, potential consultancy costs
18.	A&E	6.6.4	Consider opportunities for other organic carbon capture	2025	Staff time, consultancy costs
19.	A&E	6.6.5	WNC internal price of carbon established.	2028	Staff time
20.	A&E	7	Residual carbon being fully offset.	2030	Offsetting costs, staff time



West
Northamptonshire
Council

Construction & Maintenance Climate Strategy

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Draft 0.4	9 October 2023	For discussion at ELT and EPB
Draft 0.5	12 October 2023	Revisions post EPB
Draft 0.6	17 October 2023	Various tidying up; harmonise with ECS
Draft 0.7	3 November 2023	Minor tidying up
Draft 0.8	6 November 2023	Confirmation re NPH

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2. Introduction

West Northamptonshire Council's Corporate Plan: Fresh Start Bright Future 2021-2025 provides the vision for making West Northamptonshire a great place to live, work, visit and thrive. The Corporate Plan sets out six priorities that will make West Northamptonshire a place to thrive. The priority Green and Clean, Environment & Wellbeing commits to the following objectives.

- Net zero by 2030
- Climate summit in first few months
- Increased wildlife species & more trees
- Increased electric charging & energy efficiency
- Vibrant towns & villages
- High quality parks
- Accessible green space for all

The Council declared a climate emergency and has pledged, as part of the UK100, to focus on tackling the climate emergency and reducing its carbon emissions. The pledge commits the Council to cutting its own carbon emissions to net zero by 2030 and those of residents and businesses to net zero by 2045. In delivering this objective the Council will deliver economic, and social benefits to residents, employees, and visitors.

The Council has also adopted the United Nations Sustainable Development Goals (SDGs) to provide a wider context to its sustainability efforts. The SDGs help shape the way the Council responds to the climate challenge and thus this Strategy.

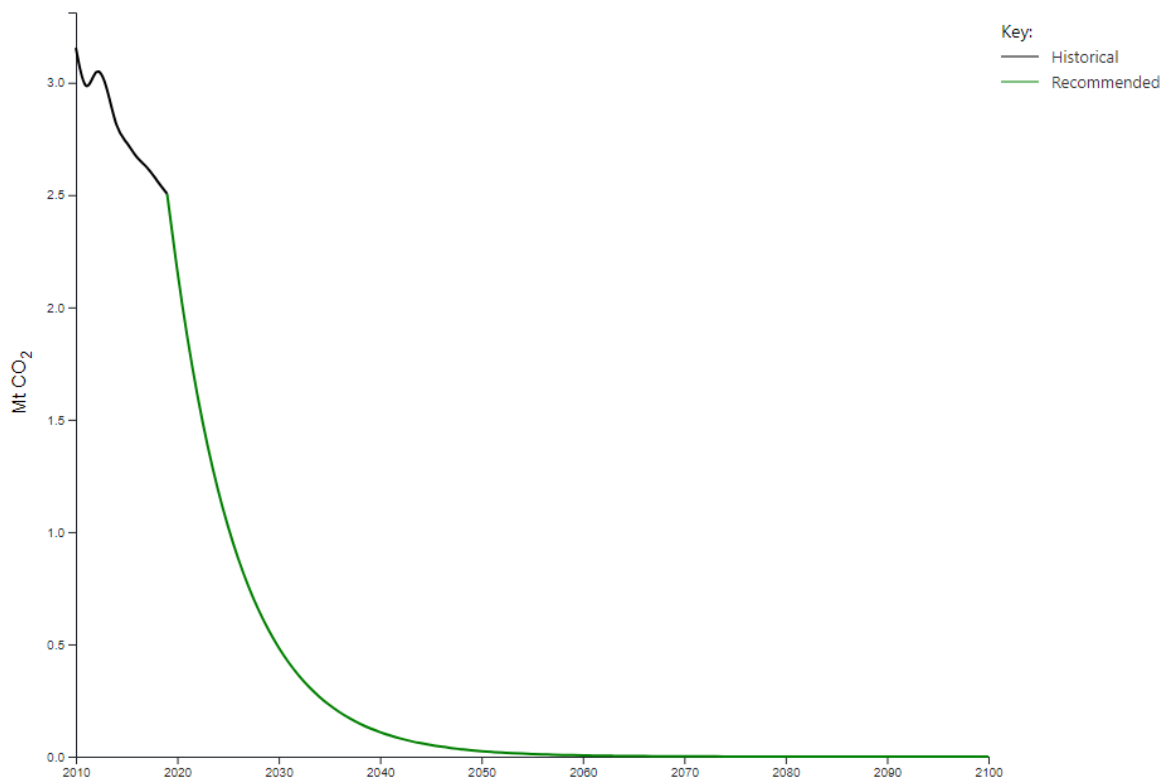
In order to deliver its legal obligations and policy goals, WNC has a significant programme of construction and maintenance work (for convenience the term 'construction' is used hereafter in this document to cover both construction and maintenance). Achieving net zero necessarily include construction and maintenance activities. The Council also benefits from continuous improvement in the cost-effectiveness of its construction operations, and in a significant number of cases, solutions will support both financial and carbon outcomes. As with other initiatives, such as our aspirations for large scale solar energy, these opportunities will be important for the Council to achieve both its sustainability and its financial objectives.

Achieving net zero is not merely about nil net emissions of greenhouse gases by a certain date; it is also about the trajectory to reach net zero; if emissions continue at a high level and then suddenly drop, more emissions will have occurred than if they are reduced over time. The International Committee on Climate Change (IPCC) stated that "In the scenarios we assessed, limiting warming to around 1.5°C requires global greenhouse gas emissions to peak before 2025 at the latest, and be reduced by 43% by 2030..."¹. The impact is illustrated for West Northamptonshire by recommended local CO₂ budgets² prepared in 2020 by the Tyndall Centre for Climate Change Research at Manchester University, as shown in Figure 1.

¹ <https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/>

² The Tyndall Centre figures are for CO₂ from energy use. Impacts from land use, land use change and forestry (LULUCF) and non-CO₂ emissions are considered separately. The CO₂ figures are a useful guide for this strategy.

Figure 1: Tyndall Centre CO₂ budget for West Northamptonshire



As Figure 1 shows, if West Northamptonshire is to contribute its 'fair' share of the UK meeting Paris Agreement targets, levels of CO₂ emissions will need to fall sharply. The Council's own targets of net zero in its own operations by 2030 and net zero for West Northamptonshire as a whole by 2045 support this approach. It is thus urgent to develop a coherent strategy to achieve carbon net zero in the Council's construction activities. That is the purpose of this document.

3. Scope and definitions

3.1 Scope of the strategy

This strategy identifies how the Council should achieve net zero carbon in its construction activities or, where this is not practical, minimising the net carbon impact, whilst pursuing savings.

For these purposes:

'Carbon' means carbon dioxide and other gases implicated in climate change, measured as equivalent tonnage of carbon dioxide (CO₂e).

'Scope 1' emissions – direct carbon emissions, such as heating and ventilation of WNC buildings and use of fleet vehicles.

'Scope 2' emissions – indirect carbon emissions, such as grid electricity use for power and lighting (including street lighting), where the carbon is largely emitted at power stations.

'Scope 3' emissions – carbon emissions from WNC's supply chains, including the production of goods and services used by WNC, waste, cloud computing, and water use.

'Emissions' means all (scopes 1, 2 and 3) carbon emissions within the following headings:

- a. Carbon emitted in the production of construction materials, including transport between manufacturing sites.
- b. Carbon emitted in the transport of construction materials to the site where they are used.
- c. Carbon emitted in construction processes, including wastage.
- d. Release of carbon from land due to construction and maintenance operations (where not covered by the Estate Climate Strategy).

'Capture' means the long-term net removal of carbon from the atmosphere by biological or technical means. Specifically in the context of construction this includes the use of construction materials (such as timber) which sequester carbon taken from the atmosphere.

'Net zero' means that the direct and indirect carbon emissions from WNC's construction activities less carbon capture in or through WNC's construction activities is zero or less.

The purchase of 'green' energy for use in construction activities is ignored, as it does not reflect the reality of the energy supplied. Thus, the average UK gas and electricity mix, and fuel mix, are assumed for calculations of construction carbon. The exceptions to this are where WNC or its suppliers or contractors are themselves generating renewable energy, directly receiving renewable energy from a local facility, or using sustainable biofuel in vehicles and construction plant.

This strategy does not manage in-use emissions of carbon (which are covered by the Estate Climate Strategy) but does take into account the need to minimise in-use emissions in design and construction of buildings and other works.

3.2 Other definitions

The following terms are also used in the strategy as defined below:

'Embedded' carbon is the carbon which will be, is being, or has been generated in the construction of a building or other works, or in their demolition and removal.

'Operational' carbon is carbon emitted in the use and maintenance of a building or other works.

'Whole life' carbon is the total of embedded and operational carbon.

'Offsetting' is the use of carbon capture to balance emissions of carbon that WNC produces.

4. Current situation

4.1 Construction activity

As noted above, WNC has to carry out construction in order to deliver its legal obligations and policy goals. Several units of the Council undertake different types of construction work, as shown in the matrix below:

	Major construction	Minor construction	Maintenance
Assets & Environment (A&E)			
Place Shaping (PS)			
Highways (HW)			

	Major construction	Minor construction	Maintenance
Care & Repair (C&R)			
Northamptonshire Partnership Homes (NPH)*			

Note: * NPH is the Council's arms' length management organisation (ALMO), which manages the Council's housing stock on its behalf.

The nature of construction activity carried out by the teams varies. Notably, the Highways service is largely concerned with civil engineering whereas the other services are, to a greater or lesser extent, focused on buildings and their immediate surroundings. However, there are also important overlaps and areas of common interest.

The Council has major programmes of construction work including:

- Delivery of new schools and school extensions and adaptations.
- Reshaping the Council's corporate estate to meet its service needs and objectives (including achieving net zero in operation).
- Highway improvements and maintenance.
- Regeneration schemes.
- Flood management and mitigation.
- Property maintenance and improvement.
- Delivery of new housing stock and improving existing housing stock (including measures to improve energy efficiency)

4.2 Addressing carbon in construction

The Council does not currently calculate or assess the carbon impacts of its construction activities. Whilst it does increasingly seek to minimise construction carbon it does not yet have a formal framework to take decisions against.

The Council procurement social value policy identifies progress in carbon reduction as one of the aspects of social value which should be considered in procurement decisions. This typically comes in the form of either carbon-related specification or contractual requirements, of assessment of carbon outcomes as part of the 'quality' scoring of bids.

The Council's Highway Services contract, with Keir, contains commitments to move to net zero under scopes 1 and 2, and to make significant progress under scope 3, by 2030. This includes obligations to calculate carbon emissions across the scope of the contract. Other contracts the Council holds which relate to construction activity typically pre-date the Council's net zero commitment or were otherwise not designed to expressly deliver low-carbon outcomes.

NPH manages a stock of about 12,000 existing Council homes and also has plans to build over a thousand new homes up to 2030. For the existing stock NPH has commissioned Parity Projects to help it develop a plan to achieve net zero emissions in operation by 2045. NPH is not currently developing a specific net zero strategy for construction.

WNC's construction supply chain is at varying levels of maturity in its ability to understand carbon impacts of design and construction choices and likewise to propose and implement low-carbon solutions. Smaller businesses are typically – but not always – less able to do this, as it requires a degree of specialist knowledge and specialisation within a business.

The Council is developing a Sustainability Strategy, which includes considering how the Council can achieve its 2030 and 2045 goals. This strategy will form part of that work.

5. Objective, aims, and approach

5.1 Overview

The Council's aim is to achieve net zero in its own operations by 2030. However, this does not require each one of its activities by itself to achieve net zero. Doing so may be uneconomic or miss benefits which could be gained from an integrated approach. Therefore, the objective and aims of the Construction & Maintenance Climate Strategy are as follows:

Objective: To achieve net zero construction which delivers good quality, attractive, economical, and functional buildings and other construction works.

Aims: To...

- a) Maximise overall benefits, by seeking solutions which deliver against WNC's wider objectives including those defined in its social value policy.
- b) Maximise efficiency, by developing knowledge and skills which enable economical and effective design and construction choices, and using the challenge of low-carbon construction to open up assumptions which may otherwise prevent efficiency gains.
- c) Use offsetting to achieve net zero only where there is not a practical or economic solution within construction, or the offsetting delivers wider benefits (such as biodiversity gain).
- d) Develop the supply chain, particularly locally, in the knowledge, skills, and systems needed to routinely deliver efficient low carbon construction.
- e) Support the delivery of net zero in operation.

5.2 Integrated working

The future is carbon net zero – in both retrofit of existing building stock and new construction. Any building not either operating at net zero or designed to be capable of this becomes an expensive liability for future generations. Therefore, this strategy, as per aim (e), seeks to deliver construction which supports net zero in operation.

Across government there is an increasing emphasis on business cases that promote carbon reduction.

5.3 Achieving net zero construction

This strategy pulls together key findings and recommendations from numerous publications, covering the ways in which the processes of briefing, design, procurement, construction, occupation, management, and valuing of building development must change to fulfil the net zero vision.

Due to the different types of construction and organisational arrangements the Council has – including its ALMO, Northamptonshire Partnership Homes (NPH) – the detailed approach to achieving the objective and aims set out in 5.1 varies, within a coherent overall approach. The main blocks are:

- Highways
- NPH
- All other WNC construction activity.

The strategy also divides into two main thrusts: a general low-carbon approach to construction in the light of net zero, and the main steps the Council will take over time to achieve net zero in construction by 2030. (As noted in the aims, where practical, economic, and appropriate, net zero will be achieved within construction, but it is highly likely that offsetting will be required. This is addressed below.)

6. A low-carbon approach

6.1 Key questions

The following questions will be used to inform the design and construction process. Whilst focused on buildings, the same principles apply to other types of construction works.

Build less	<ul style="list-style-type: none"> • Is a new building necessary to meet the brief? Has retrofit been considered? • Can existing materials on or near the site be used? • Has the brief been interrogated against actual WNC need and represents the most efficient solution? • Can uses be shared or spaces be multi-functional? • If the use is temporary, can a relocatable option be used? • Carry out a material efficiency review – are all materials proposed necessary? • Seek to simplify the design – simple designs usually mean less embodied carbon.
Build light	<ul style="list-style-type: none"> • Reduce the weight of the dead loads where possible. • What loadings are really required to meet the brief? • Can shorter spans be used?
Build wise	<ul style="list-style-type: none"> • Ensure longevity and robustness of material and systems specifications, as appropriate to the intended use. • Review material efficiency options like designing to standard building sizes or for a repeating module. • Structural members should be designed for 100% utilisation rate where possible providing this does not compromise reasonable future adaptation. • Analysing a site is an important activity at the start of a project and this can be extended to the identification of ways of reducing embodied carbon. Possible opportunities include: <ul style="list-style-type: none"> ○ There may be existing structures or buildings that can be reused or become a source of recycled materials. ○ There may be locally sourced material options, reducing transport to site while allowing architectural expression of the context. ○ Designing a project around a site topography, reusing excavated soil and reducing the amount removed from site. ○ Minimise the need for future maintenance and adaptation for climate change and ensure maintenance can be easily carried out.
Build low carbon	<ul style="list-style-type: none"> • Reduce the use of high embodied carbon materials. • Identify 'big ticket items' and focus on the big wins first including mass earthworks, structure, and envelope. • Use natural and renewable materials where practical. • Explore design for manufacture and assembly (DfMA) solutions if this reduces embodied carbon or wastage.
Build for the future	<ul style="list-style-type: none"> • Ensure future uses and end of life are considered and adaptability is designed in. • Where a building is to be designed for long life, make it attractive, so in the future there will be a desire to re-use it rather than replace it (and so waste the embodied carbon). • Consider regular structural grid and future-proofed risers and central plant space. • Mechanically fix systems rather than adhesive fix so they can be demounted and reused or recycled, supporting a circular economy.

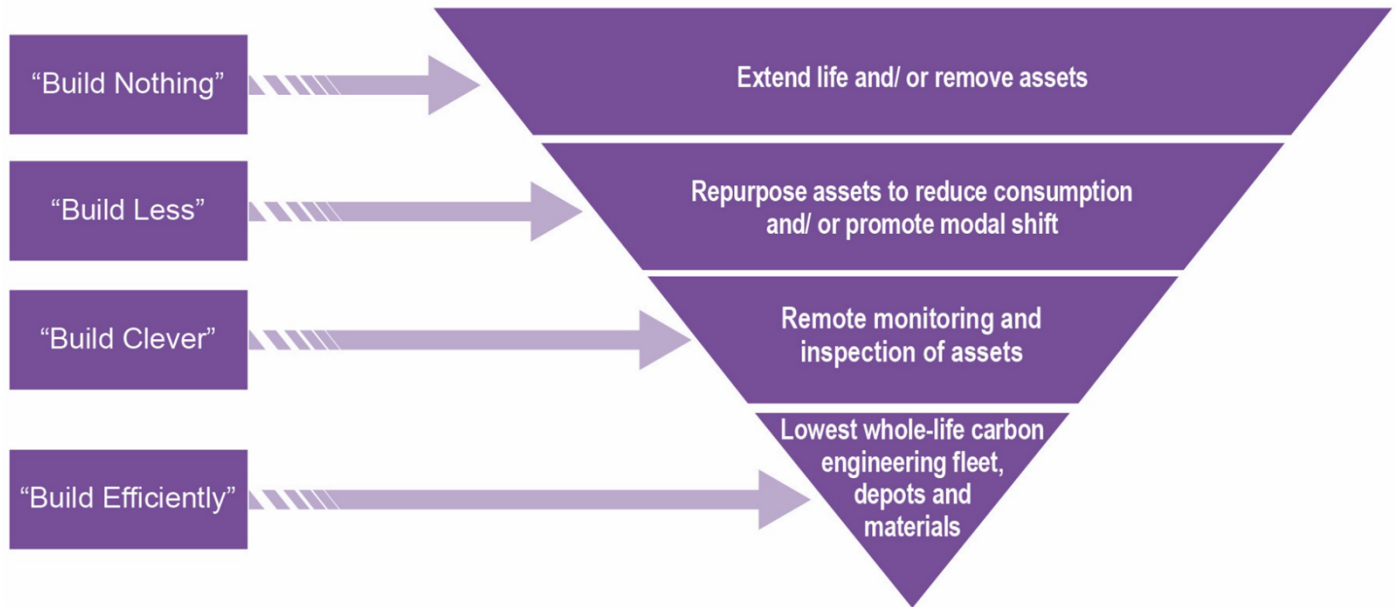
	<ul style="list-style-type: none"> Explore methods of creating longevity for materials without additional coatings, as they can reduce the recyclability of the material.
Build collaboratively	<ul style="list-style-type: none"> Solutions must involve the whole design team and intended end-users. Use 'rules of thumb' data to drive decision making in meetings, especially in the early stages of design.

A complementary approach, mapped specifically for highways activities, is shown in Figure 2.

Figure 2: PAS2080 emissions hierarchy applied to highway asset management

PAS 2080:2016
Carbon emissions reduction hierarchy

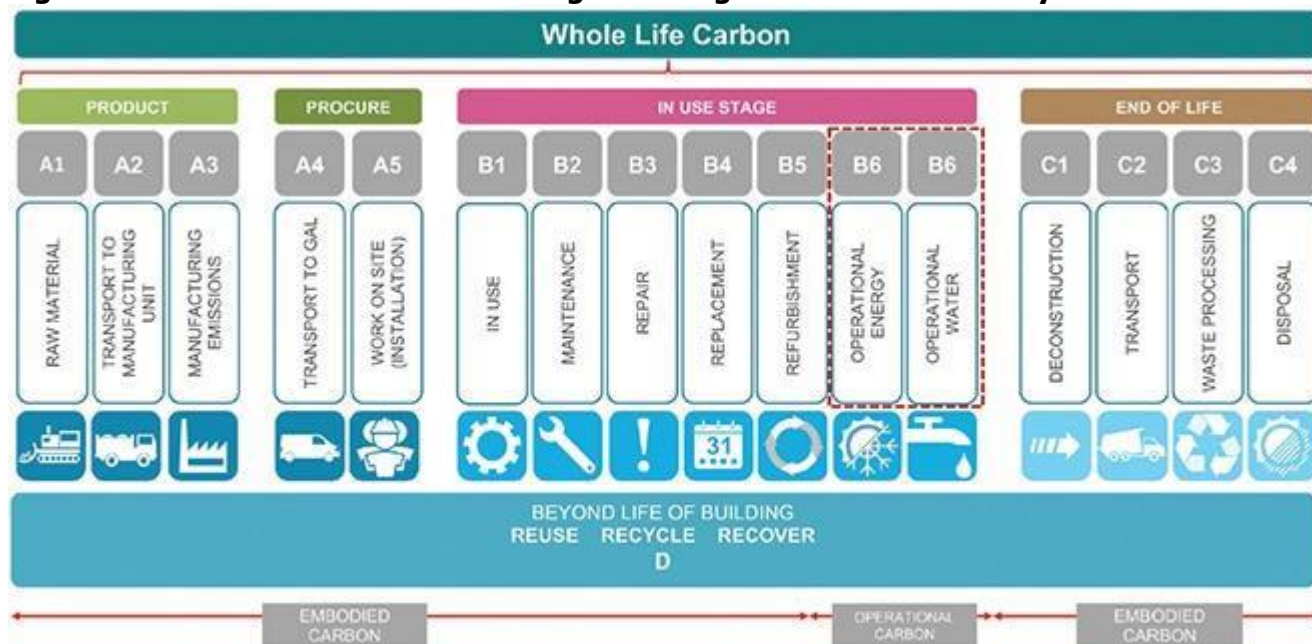
Application to of Carbon Hierarchy
to Highways Asset Management



6.2 Low carbon through design and delivery

The Council will consider procurement of net zero buildings at the start of a project, and throughout the relevant RIBA Stages, as the project develops. This is illustrated in Figure 3. Whilst RIBA stages are not typically used for civil engineering works, and are only partly relevant to maintenance works, the same overall approach should be applied in such cases.

Figure 3: Carbon considerations through building or other works life cycle



Operational carbon should also be considered in the design stages. The outputs, in time (see 7), will form part of the life cycle carbon assessment and thus guide design choices.

RIBA Stage 0 – Strategic definition and RIBA Stage 1 – Preparation & briefing

Whole life carbon thinking should start at the outset of a project at the RIBA Stages 0 and Stage 1. The Council will create clear project briefs which identify the requirements the building or other works needs to meet, so the design team can optimise the design including in respect of carbon. Briefs should also identify any particular opportunities or constraints in relation to carbon.

RIBA Stage 2 – Concept design

RIBA Stage 2 sets a project’s architectural concept in line with the site information and the project brief, including the spatial requirements. During this stage, regular design reviews are used to obtain comments from project stakeholders and the design is iterated in response. Any project brief derogations are agreed, or the project brief is adjusted to align with the emerging architectural concept.

At this stage, the design team should ensure that both embedded and operational carbon are addressed in design thinking, and any significant challenges or opportunities highlighted. Consideration should be given to choices of low-carbon materials and how these may affect the design concepts being developed, so the building or other works are not set on a high-carbon path.

RIBA Stage 3 – Spatial coordination

RIBA Stage 3 is fundamentally about testing and validating the architectural concept, to make sure that the architectural and engineering information prepared at Stage 2 is spatially coordinated before the detailed information required to manufacture and construct the building is produced at Stage 4.

At this stage, more information about embedded and operational carbon will be available, allowing refinements to design to be made to optimise outcomes. Any significant issues which are now identified should be highlighted so that informed decisions can be made before the design is further crystallised and it becomes harder and more expensive to make significant changes.

RIBA Stage 4 – Technical design

RIBA Stage 4 incorporates design details and all the key sustainability strategies into the project's drawings and specifications, for tender and procurement. It is important for the tender documentation to ensure that the competing contractors understand the project's whole life carbon requirements, the goals, as well as the process for delivering and monitoring carbon reduction during construction.

If any new issues arise these should be highlighted so informed decisions can be made about whether any changes in strategy are called for. Whilst such changes are less desirable at this stage, informed decisions are still possible.

RIBA Stage 5 – Manufacturing & construction

RIBA Stage 5 is when the actual carbon impacts of the construction process need to be monitored against intentions, taking into account any evolution of the scheme during tender and procurement. Contractor's proposals including sources of key materials will need to be evaluated as part of tender assessment, and then monitored during construction.

RIBA Stage 6 – Handover

RIBA Stage 6 should include a post-practical completion final review of the building information, with a final assessment of the embedded and the anticipated whole life carbon impacts of the completed project. This, together with information on how to manage the building efficiently and effectively – and therefore in a low-carbon way – should be included within the building operation and maintenance manual.

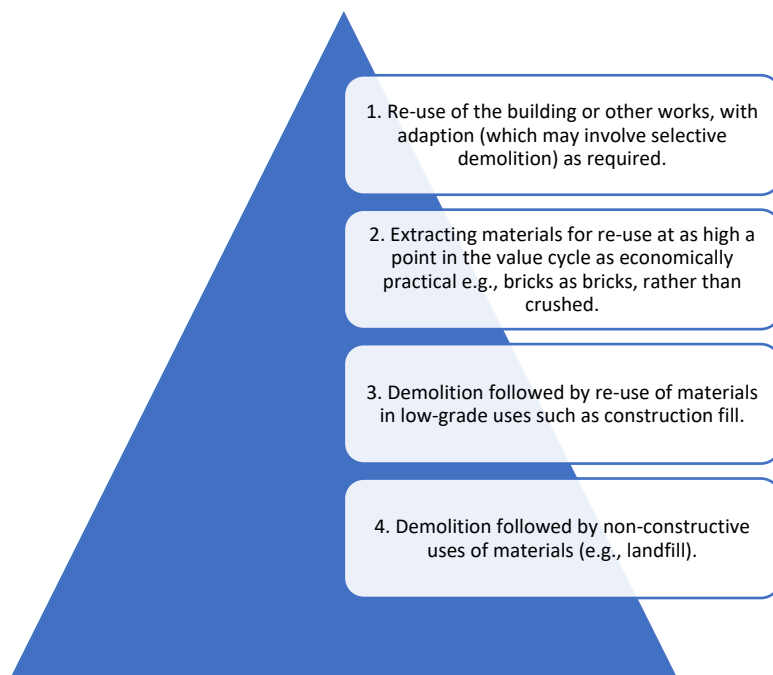
RIBA Stage 7 – Use

RIBA Stage 7 should include a post occupancy evaluation (POE) process, which takes into account of all whole life carbon impacts. This should include the actual performance of the building's environmental systems; the fabric's physical performance with respect to durability and fitness for purpose and an assessment of the maintenance regimes for both.

Re-use and demolition

When a building or other constructed item reaches the end of its useful life for its original purpose, and no other purpose naturally arises without significant change, a decision needs to be taken about its future. At that point an assessment should be made of options, with a focus on retaining benefit from the embedded carbon as far as practical. In accordance with the waste hierarchy, consideration should be given in the following order of priority shown in Figure 3.

Figure 3: Hierarchy of options at end-of-life



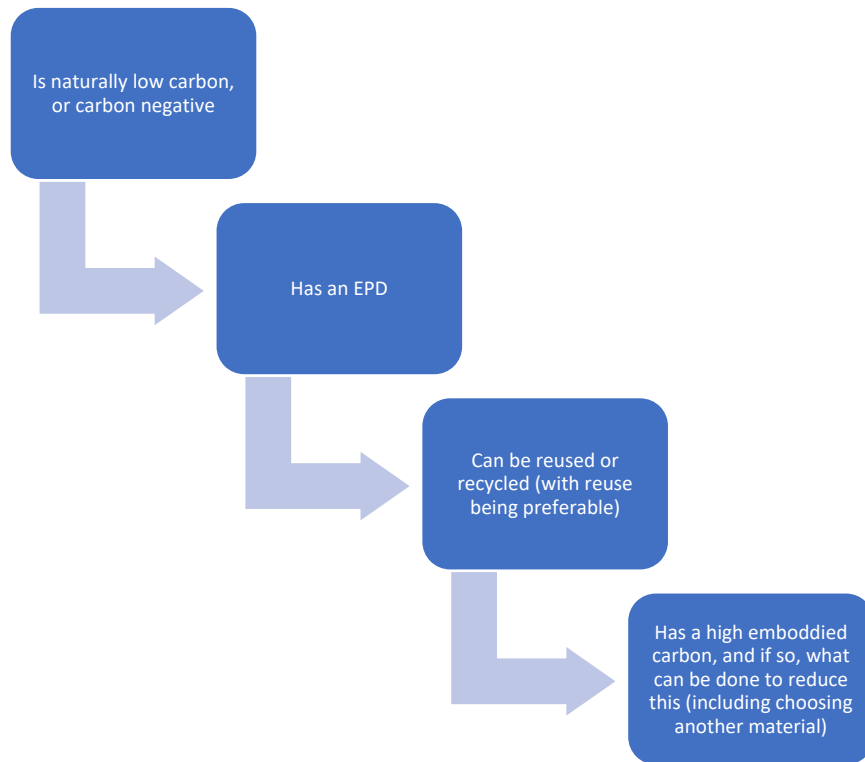
6.3 Selection of materials

There is no single solution that suits all low embodied carbon construction. Each material should be chosen to have the best performance compared to other materials including the lowest whole life carbon impact. Materials with higher embodied carbon should be considered only if a sufficient reduction of the operational carbon over the lifetime of a building or other works is likely to be achieved. Even then, consideration needs to be given to the need to reduce carbon emissions quickly, it may be preferable to use materials with lower embodied carbon. Achieving a net carbon benefit from, say, 2080 would be of limited value given the available global carbon budget to 2050³.

Wherever possible, locally sourced or reclaimed materials should be used to minimise delivery distances and packaging. The environmental product declaration (EPD), obtained via thorough life cycle analysis (LCA), details the environmental impact of a material or component. The recyclability of the material at the end of the building's life expectancy should also be considered.

For any material specified in a building, designers should consider if the product:

³ The IPCC identifies the global 'carbon budget' for the period between 2018 and 2050 as "about 420 GtCO₂ for a two-thirds chance of limiting warming to 1.5°C" whilst acknowledging a significant degree of uncertainty about the number (in either direction) (<https://www.ipcc.ch/sr15/chapter/chapter-2/>). The point stands, however, irrespective of the number; there is a total amount of carbon which can be emitted prior to 2050 whilst being reasonably likely to remain within the 1.5°C or 2.0°C limits.



6.4 Low carbon and carbon beneficial materials

Natural materials – that is, materials which can be used in construction with limited processing – are beneficial in terms of embedded carbon. Whilst this is particularly true of wood, as this 'locks up' carbon removed from the atmosphere (and is thus potentially carbon beneficial) it is also true of stone and soil as well. Where such materials can be obtained locally this also reduces transport carbon emissions and may also enhance local character in what is built.

Therefore, WNC will, where economically practical and achieves the required performance and durability, use wood, stone, earth, and organic-derived materials in its construction projects.

Wood

The growth of trees naturally removes carbon from the atmosphere and can provide attractive and durable buildings and other structures. Carbon sequestration rates are dependent on many variables, e.g., maturity, forest type, local climate, soil, and forest management. The optimum sequestration rate is reached by felling trees as they reach maturity, as the carbon sequestration rate then reduces considerably, starting the process again by planting new trees. Using the felled timber in long life harvested wood products such as construction products provides the additional benefit of delaying any re-emissions.

Structural timber can also often be recycled into further useful building components or other items. At the end of its useful life, timber retains a calorific value and can be used as a fuel, displacing the need for further fossil fuel use.

In order to ensure the harvested wood used for any timber products is replaced by a new sapling, wood and timber products should always be sourced from sustainably managed forests.

Stone

Like wood, stone is an ancient construction material. Buildings constructed of stone can last for thousands of years and are typically attractive, supporting retention and re-use. Whilst the use of stone does not remove carbon from the atmosphere in the way the use of wood can, stone is typically a low-carbon material. This is especially the case where the stone does not need to be moved long distances; due to its weight, moving stone long distances is likely to emit significant levels of carbon.

Earth

The use of mass earthworks is also an ancient practice. Earth is an excellent heat store, allowing buildings to remain cooler in summer and warmer in winter. The volume needed, however, does limit potential uses. Reinforced earth is now widely used in civil engineering works, as is earth which has been treated to improve its engineering properties. Where practical, consideration should be given to using cob or adobe for walling for example.

Earth is intrinsically low carbon. However, simply because of their scale, mass earthworks are significant emitters of carbon from construction plant. This needs to be allowed for in making decisions on its use.

Once in place Earth can be planted and provides an attractive environment for users and those passing by, and which can support biodiversity and reduction in flood risk.

Other organic based products

Consideration should be given to the use of other organic based products such as hemp blocks for walling and wool insulation. Like wood, these also have the potential to be carbon negative – that is, to sequester carbon from the atmosphere – and as such assist in achieving net zero construction.

6.5 Other materials

Where naturally low-carbon materials are not practical solutions, other materials will be used. The Council will focus on the major areas of carbon production first. In making choices, consideration needs to be given to both the inherent embodied carbon in the material and the transport carbon in moving it to the construction site.

Concrete

Concrete is the most used material in the building sector. It is used for foundations, floors, walls, and framing. It is very carbon intensive, as the process of heating limestone to create 'standard' Ordinary Portland Cement typically uses fossil fuels and also the heated limestone directly gives off CO₂.

The Council will therefore seek to minimise the use of concrete, and where it does need to be used will seek to use emerging lower-carbon concretes.

Brick

Brick is a popular choice for walls, façades, and paving, as well as some foundations. In the UK, red brick is probably the most trusted building material. Its production is the largest sector in the UK clay construction products market. Brick is produced by cutting a piece of clay into units which are fired at around 2,000°C. Emissions come from clay extraction, fossil fuels used in the heating, and from wider manufacturing processes.

Due to the heat needed for production, bricks have a relatively high embodied carbon. Whilst still likely to be used because of their practicality and attractiveness, this should be minimised. Increasingly, stone

producers are providing stone cut into brick sizes, which can be a useful alternative with a much lower embodied carbon. In some cases, unfired bricks can also be used; these also have much lower embodied carbon.

Where brick is used, designs should, where practical, support re-use, notably by using lime rather than cement mortar.

On larger scale buildings, brick slips are often used to save time and costs. Brick slips are mounted on steel fixings and used as a rainscreen. This increases embodied carbon on a weight basis and also sacrifices the thermal mass benefits. Therefore, it is unlikely brick slips will represent an appropriate choice on WNC construction projects.

Steel

51% of global steel is used for construction⁴. Steel is used in a wide range of construction projects, ranging from single dwellings to large scale infrastructure. It is flexible and capable of supporting a wide range of structural forms. It is energy intensive in extraction and refining but is capable of being recycled.

WNC will use steel where it is the most appropriate form of construction. Designs should seek to maximise the efficiency of use and support re-use and recycling once the building or other structure is no longer needed.

Aluminium

The production of primary aluminium requires a very high consumption of electricity, almost ten times that of steel. Due to the energy intensive primary production process, the embodied carbon is very high, especially if aluminium is used in large volumes.

By contrast, aluminium is highly recyclable, with properties that do not deteriorate as the material is re-used. Worldwide, around 75% of all aluminium produced is still in use. Recycling uses only around 5% of the energy needed to produce primary aluminium. The recycled material supply chain is, however, not enough to cover the current demand.

In order to reduce the embodied carbon as much as possible, where aluminium is unavoidable, it should either be recycled material or, if primary, it should have been produced using electricity from renewable sources. To support the reclaiming of aluminium at the end-of-life, inventories of aluminium components should be kept. Designs should also seek to enable aluminium to be easily removed for re-use or recycling.

Glass

Soda-lime glass accounts for 90% of all the manufactured glass. It is made up of 70-74% silica, along with sodium carbonate, lime, magnesium oxide and aluminium oxide to enhance its performance. Glass production is energy intensive but, unlike concrete, the process does not also result in the direct emission of CO₂. Glass is also highly recyclable.

With its unique translucent properties, glass is used for curtain walls, façades, windows, skylights, partitions, bulbs, and tubes. It is thus unavoidable in most building projects. However, architectural fashions have also resulted in its use in unsuitable locations, such as glass curtain walls where in practice it is undesirable to have complete transparency and excessive heat gain and loss occur. This makes it harder to achieve net zero in operation.

Designs should only use glass where its particular properties are actually beneficial. Where possible designs should support the re-use of glass components when no longer required in that building or other structure,

⁴ World Steel Association

or if this is not possible the easy and safe removal for recycling. As a last resort (but above landfill), secondary glass can have a second use as insulation or aggregate.

Bitumen

A range of bituminous binders are used to create bound surfaces for roads, paths, car parks, playgrounds and so on. Bitumen is based on a fossil fuel (oil) but as long as it remains in use in surfacing, its carbon content is not released into the atmosphere. Production of bitumen from crude oil is, however, an energy-intensive process. It is also normal to heat the bitumen-containing materials when laying them to support achieving the required degree of compaction and smoothness. In recent times, 'warm' and 'cool' mix bitumen-containing mixes have been devised, which use chemical alterations to reduce the degree of heating required when laying.

As with other materials, the use of bitumen should be minimised where realistically possible (e.g., ensuring road widths are not excessive). Cool or warm mixes should be used where these achieve the required level of performance. Once in situ, planned maintenance such as surface dressing will assist in extending the lifespan of the material and thus reducing the need for replacement.

When it is necessary to replace them, bituminous mixes should be reused with fresh binder or recycled and used as aggregate where practical.

7. The path to 2030

7.1 Overall considerations

Whilst in theory it would be desirable to move immediately to net zero construction, neither the Council nor its supply chain is able to deliver this yet. Nor can the Council or the construction industry stop construction for a period to redesign systems and products; construction must go on, for social, economic, financial, and in some cases, environmental reasons. Therefore, it is unavoidable that change will be incremental. The Council will also need to develop both its own capacity and help its supply chain develop capacity to build in low-carbon ways.

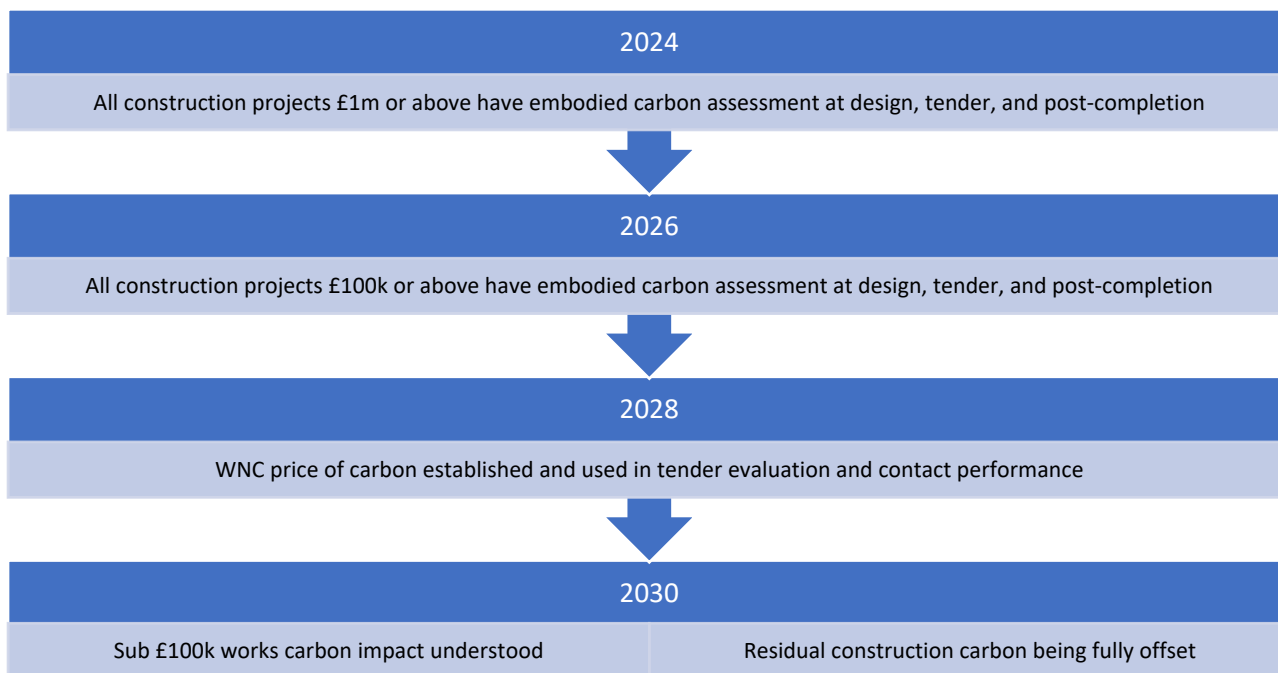
In order to achieve net zero, the Council needs to be able to measure the carbon impact of its construction operations. This will be easier to achieve in large projects and may never be practical or cost-effective for smaller ones. There is also a need to keep assessment and measurement proportionate, even on larger projects; expending a high degree of effort measuring, say, 2% of emissions is likely to distract from the steps needed to achieve meaningful reductions in major sources of emissions.

The actions set out below reflect these considerations.

7.2 Understanding and pricing carbon in construction

(For works under the Highway Services Contract, different arrangements will apply, see Section 10.)

The steps below show the key steps the Council will take in understanding and applying its construction carbon emissions:



The WNC carbon price would be based on the cost to WNC to fully offset each tonne of CO₂e emitted. Where the carbon price is used in:

- Tender evaluation, each tender price would be adjusted by the projected carbon emissions multiplied by the WNC carbon price.
- Contract performance, actual payments to contractors would be reduced by the amount of additional carbon emitted exceeds the tendered value, multiplied by the WNC carbon price.

Arrangements for offsetting are described further in section 8.

7.3 Efficient assessment

Assessing the carbon impact of every material and operation in construction is likely to be impracticable and would certainly be disproportionate, as the effort involved would exceed the value when small impacts are subject to detailed examination. It is also likely to be particularly challenging for smaller businesses to calculate the carbon impacts of their activities or the materials they propose to use.

Therefore:

- a) The Council will prepare or adopt a published inventory of commonly used significant materials together with their expected carbon impacts. Contractors would be free to propose different values with evidence to justify them but could otherwise use those provided or adopted by the Council unless it was clear this was not applicable to the particular material or process used.
- b) The use of fuel and energy on construction sites would be measured and used in carbon assessments. This should be relatively straightforward to capture, and will reflect the carbon impacts of, for example, large scale earthworks. However, the fuel used by workers travelling to and from construction sites would not be included, as it is impractical to measure in a meaningful way and is unlikely to be material on the scale of projects undertaken by the Council.
- c) Fuel and energy used in material production and transport to the construction site would be considered in carbon assessments.
- d) Where EPDs are available, they will be accepted unless there is a clear reason that they are not applicable or valid.

7.4 Skills and abilities

Delivery of effective low-carbon construction requires ongoing development of skills and knowledge, both within the Council and within its supply chain.

Accordingly, the Council will:

- a) Make low carbon design and construction a key element of staff continuing professional development (CPD).
- b) Hold an annual WNC Construction Conference (see Section 7.5) and develop a Construction Manual (see Section 7.6), to share and embed low-carbon knowledge and skills.
- c) Reward competence on low carbon design and delivery in assessing applications to be on frameworks and similar arrangements organised by the Council, and where using frameworks arranged by others, seek where practical to choose those which do the same.
- d) Work with its supply chain to help it access training and resources to develop skills, knowledge, and systems to deliver low carbon designs and construction practices.

7.5 WNC construction conference

Delivering sustainable, low carbon construction requires sustained effort from all involved, leadership, and processes for checking on progress and, if necessary, taking corrective action to ensure the goals are met. It also requires, as noted above, professional development in the new knowledge and skills needed.

To help achieve this, as well as continuous improvement of design and construction in all its aspects, the Council will hold a WNC Construction Conference each year. This will engage all those in the WNC group⁵ who are involved in business cases, procurement, design, and delivery of construction works. In addition to its wider functions, it will be a focus for reviewing progress on delivery of this Strategy and provide professional development in low carbon construction.

7.6 WNC Construction Manual

WNC is developing a Construction Manual, to capture good practice and provide guidance on the best ways of managing the conception, design, and delivery of construction projects. This will include further guidance on low-carbon design and the implementation of this strategy.

The Manual is unlikely to apply directly to Highways schemes, although some of its content should still be useful in that context.

7.7 Local material supply

The supply of suitable materials, ideally locally, will be important to successful delivery of net zero construction. Therefore, the Council will explore options for local supply of construction materials, especially low-carbon and carbon negative materials. This will include:

- a) Exploring potential existing local sources of construction materials and whether the Council can secure access to these.
- b) Exploring whether it can, through its minerals and waste planning function, and in conjunction with neighbouring authorities enable greater local provision of stone, sand, and aggregates. This should benefit both the Council and other local construction activity (thus assisting with both the 2030 and

⁵ WNC staff, those of NPH, and of any other arm's length or subsidiary bodies.

2045 targets). Such minerals sites should be designed with a view to restoration and biodiversity value on completion.

- c) Developing an internal function mapping the anticipated use and production of construction materials (notably from demolition and dismantling), aiming to maximise potential for re-use at the highest point in the value chain. If practical, this activity would be extended to other organisations involved in construction and demolition/dismantling locally.
- d) Exploring potential for local timber production – see item 7.8.

7.8 Local timber supply – West Northamptonshire productive woodland

As noted above, one of the key materials for achieving net zero construction is timber. As the growth of wood extracts carbon from the atmosphere, there is potential for the carbon locked into timber construction to balance carbon emissions from other aspects of construction.

Practically, different forms of timber will be needed, and in many cases established forestry operations will be the best sources of such timber. However, there may also be the potential to develop local supply, and in so doing, to create multiple benefits. It is, therefore, proposed to investigate the potential of creating productive woodland in West Northamptonshire, with the aim being to secure as many as possible of the following benefits:

- Production of wood for use in construction. Whilst it is likely to be some decades before trees are ready for use in structural components, smaller elements such as shingles or fence posts may be available sooner.
- Carbon capture.
- Biodiversity gain. This would include potentially allowing the Council to sell biodiversity net gain credits.
- Public access and enjoyment. Whilst public access needs to be managed, the Forestry Commission has shown it is possible to combine public access with productive woodland.
- Flood risk mitigation. Suitable location(s) may allow the woodland to slow the passage of water and cause some of it to be absorbed into the land or be taken up by the trees, thus reducing flood risk downstream.

Creation of local productive woodland will need its own business case, demonstrating that it is viable and cost-effective. This work will be done in alignment with work on the Council's Tree Policy & Strategy and Local Nature Recovery Strategy.

7.9 Procurement

Key steps relating to procurement in delivering net zero construction are set out in Section 7.2 and items (c) and (d) of Section 7.3. Alongside these carbon-specific measures, it will be important to ensure that wider sustainability issues continue to be addressed, through specification and contractual requirements, and social value scoring, as appropriate.

Additionally, where practical the Council will use partnering approaches which support early engagement of the wider construction supply chain. This maximises the potential to identify and use the best solutions, for carbon and more widely.

8. Offsetting

It is almost certain that offsetting will be needed to achieve net zero across WNC's construction works. The nature of these, involving the use of large amounts of materials, transport, and use of heavy plant, means

even with full use of low-carbon and carbon negative materials, it is likely a residual amount of carbon will be emitted. Nor would it necessarily be in the interests of the residents of West Northamptonshire to seek to achieve net zero within each sector of WNC's operations, when it could be achieved more efficiently taking them as a whole.

The WNC internal carbon price, being the cost to WNC of offsetting each tonne of CO₂e emitted, will therefore be critical in making balanced judgements about when to prevent carbon emissions and when to offset them. The price's function in tender evaluation and contract management set out in 7.2 is an example of the function it will perform.

As noted in the definitions (sections 3.1 and 3.2) offsetting is taken to mean removing carbon from the atmosphere. Whilst both biological and technological methods are permitted under the definition, it is likely biological methods will be the main or only means actually available to WNC in the period to 2030. Where possible, offsetting measures will be designed to also provide other benefits (e.g., as proposed to be explored in 7.8).

9. Northamptonshire Partnership Homes

WNC and NPH have shared aspirations for achieving net zero. This strategy is designed to be applicable to NPH operations as it is to WNC in-house projects. It has been shared with, and agreed by, NPH.

NPH will in particular collaborate with WNC on issues such as the carbon price and delivering offsetting measures.

10. Specific issues for highways

10.1 Highways contract

WNC has procured the bulk of its routine highway operations, including maintenance and smaller schemes, via a single contract. This is currently held by Keir. The contract contains extensive decarbonisation commitments. These require that by 2030 the Highways service will be net zero for scopes 1 and 2 and will have made substantial progress in removing carbon from scope 3 (which is the largest source of emissions).

10.2 Highways approach

Much of the approach set out in this Strategy is applicable to works under the Highway Service Contract (HSC), and indeed is aligned with what the contract provides. The approach to be taken will be as follows:

- a) The provisions of the HSC relating to decarbonisation will be applied.
- b) Information on net carbon emissions under the HSC will be calculated.
- c) Offsetting will be applied to net carbon emissions under the HSC as it is applied to other construction works.
- d) A low carbon palette of materials and specifications will be devised and applied.
- e) The Highways & Transport service will be an integral part of arrangements such as developing skills and ability (section 7.3), the Construction Conference (section 7.5) and local material supply (section 7.7).

10.3 Major highways projects

Major highways projects, outside of the Highway Services Contract, will be subject to the same processes and approach as for other construction works (as set out in Section 7.2).

11. Conclusions

The main outcomes of this strategy should be:

- The ability of the WNC group to deliver on the 2030 net zero target in practical and cost-effective ways.
- Maximised wider benefits from carbon reduction and offsetting work.
- Enhanced capability to deliver net zero both within WNC and NPH, but also the supply chain – helping to drive wider change and thus supporting the 2045 target.
- Enhanced awareness and cultural change in which everyone takes responsibility for decarbonisation.

12. Review

This strategy and action plan, and the Construction Manual, will be subject to annual review at the WNC Construction Conference. If changes to the Strategy appear to be merited, they will be prepared and submitted for approval in the usual way.

Appendix A: Construction & Maintenance Climate Strategy Action Plan

This section sets out our ongoing carbon reduction activities for WNC. This plan will undergo regular review and refinement as part of the overall management review cycle. In addition to the abbreviations given in 4.1, 'Proc' is Procurement, 'ED' is economic development, 'Fin' is Finance, and 'PL' is Planning.

No.	Service areas	Source	Action	Target delivery date	Resources
1.	A&E, PS, HW, NPH	7.2	All construction projects £1m or above have embodied carbon assessment at design, tender, and post-completion.	2024	Staff and consultant time
2.	A&E, PS, HW, C&R, NPH	7.2	All construction projects £100k or above have embodied carbon assessment at design, tender, and post-completion.	2026	Staff and consultant time
3.	A&E	7.2, 8	WNC price of carbon established.	2028	Staff time
4.	A&E, PS, HW, C&R, NPH	7.2	WNC price of carbon used in tender evaluation and contact performance.	2028	Staff time
5.	A&E, PS, HW, C&R, NPH	7.2	Overall carbon impact of sub-£100k works understood.	2030	Staff time, potential consultancy costs
6.	A&E, NPH	7.2, 8	Residual construction carbon being fully offset.	2030	Offsetting costs, staff time
7.	A&E	7.3(a)	Preparation or adoption of inventory of commonly used significant materials with their expected carbon impacts ('carbon toolkit')	2025	Staff time
8.	A&E, PS, HW, C&R, NPH	7.4(a)	Low carbon design and construction made a key element of staff continuing professional development (CPD).	2024 and ongoing	Staff time, training costs
9.	A&E, PS, HW, C&R, NPH	7.4(c)	Competence on low carbon design and deliver in assessing applications to be on frameworks and similar arrangements organised by the Council rewarded, and where using frameworks arranged by others, seek where practical to choose those which do the same.	2024 and ongoing	Staff time
10.	A&E, PS, HW, C&R, NPH, Proc, ED	7.4(d)	Work with the supply chain to help it access training and resources to develop skills, knowledge, and systems to deliver low carbon designs and construction practices.	2024 and ongoing	Staff time
11.	A&E	7.5	Organise WNC Construction Conference.	2024 and annually thereafter	Staff time, minor costs

12.	A&E, PS, HW, C&R, NPH, Proc, Fin	7.5	Participate in WNC Construction Conference.	2024 and annually thereafter	Staff time
13.	A&E	7.6	Prepare and keep updated WNC Construction Manual.	2023 and ongoing	Staff time
14.	A&E, HW	7.7(a)	Exploring potential existing local sources of construction materials and whether the Council can secure access to these.	2024	Staff time
15.	PL, A&E	7.7(b)	Exploring greater local provision of stone, sand, and aggregates.	2024 and ongoing	Staff time
16.	A&E	7.7(c)	Developing an internal function mapping the anticipated use and production of construction materials.	2024 and ongoing	Staff time
17.	A&E	7.8	Developing business case for West Northamptonshire productive woodland.	2025	Staff time, potential consultancy costs
18.	HW	10.2(d)	Developing low-carbon palette of materials and specifications for highway use.	2025 and ongoing	Staff time, potential consultancy costs



WEST NORTHAMPTONSHIRE COUNCIL

14 November 2023

Portfolio Holder for Finance – Councillor Malcolm Longley

Report Title	Council Tax Care Leavers Discount
Report Author	Martin Henry, Executive, Finance

List of Approvers

Monitoring Officer	Catherine Whitehead	26/10/2023
Chief Finance Officer (S.151)	Martin Henry	13/10/2203
Communications Lead/Head of Communications	Becky Hutson	26/10/2023

List of Appendices

Appendix A - S13A Policy

1. Purpose of Report

- 1.1 This report provides members with an overview of the support currently in place for Care Leavers residing in West Northamptonshire who have a Council Tax liability and outlines a proposal to introduce an automatic discount for persons aged 18 to 21 who are leaving care.

2. Executive Summary

- 2.1 West Northamptonshire Council (WNC) understands that the transition out of care for young people can be very challenging particularly when moving into independent accommodation and the requirement to manage their own finances and manage their money for the first time. This report proposes a discretionary Council Tax discount for Care Leavers aged 18-21 from April 2024
- 2.2 S13A (1) (c) of the Local Government Finance Act 1992 (as amended) gives billing authorities the discretion to reduce the amount of Council Tax payable in relation to individuals or for classes of

taxpayers. This provision is separate to and distinct from the Local Council Tax Reduction Scheme which is made under Section 13A(1)(a) of the Local Government Finance Act 1992.

- 2.3 The support currently in place from WNC for Care Leavers is Council Tax Reduction, which is means tested and awarded after statutory discounts, exemptions, disability discount. It is also subject to an application process.
- 2.4 Members are asked to consider the content of this report and to approve the proposal to implement the proposed Care Leavers scheme for 2024/25 using discretionary powers under Section 13a of the Local Government Finance Act 1992.

3. Recommendations

- 3.1 It is recommended that the meeting:
 - a) Note the contents of this report.
 - b) Recommend to Council the implementation of the proposed Care Leavers discount for 2024/25 and the policy shown at Appendix A of this report.

4. Reason for Recommendations

- 4.1 West Northamptonshire Council recognises the vulnerability of people leaving care and its role as the corporate parent. The recommended approach ensures that all eligible care leavers receive the support they are entitled to.

5. Report Background

- 5.1 The term “care leaver” is defined in the Children (Care Leavers) Act 2000 and refers to eligible, relevant, and former relevant children.
- 5.2 In its Care Leavers strategy published in 2016, the Government made recommendations that local authorities should consider exempting care leavers from Council Tax, using their powers under Section 13a of the Local Government Finance Act 1992.
- 5.3 The Council recognises that young people leaving care may find the transition of moving into independent accommodation and managing their finances challenging. As a result, young people leaving care could easily find themselves in financial difficulties.
- 5.4 Section 13a (1)a of the Local Government Finance Act 1992 allows the Council to reduce the amount of Council tax a person must pay. This includes the power to reduce the amount to nil.

6. Issues and Choices

Current Support

- 6.1 Under the Local Council Tax Reduction Scheme West Northamptonshire Council’s Care Leavers can receive help with up to 100% of their Council Tax liability. However, the scheme is means tested based on the income of the household and the current scheme also relies on care leavers making an application and providing all the required verification to support the claim, this does not

always happen, and Care Leavers do not get the support they are therefore potentially entitled to.

Proposed Change

- 6.2 The proposal is to award a local discount directly to the Council Tax account of Care Leavers aged 18-21 after any other discounts and exemptions have been applied and proportionate to the number of residents liable for Council Tax in the property. For example, a Care leaver sharing with 3 other people would receive a 25% discount. The discount will apply until the Care Leaver turns 21. From this date no discount will apply but the Care Leaver can apply for Council Tax Reduction so preventing that 'cliff edge' at 21.
- 6.3 Assistance will only be provided to young people leaving care in North and West Northamptonshire and residing within the West Northamptonshire Council area.

The benefits of introducing this policy include:

- bringing the Council in line with other Councils who already offer the discount
- It removes the need for the Care Leaver to apply for Local Council Tax Reduction
- It reduces the risk of Care Leavers not applying for support and recovery process taking place
- There are potential efficiencies for the Benefits and Council Tax teams.
- It offers greater care and support for a vulnerable group

The proposed policy asks that the Care Leavers team notify the Council Tax team in writing of any person leaving care and the discount can then be applied.

- 6.4 The Council shall operate the proposed scheme as follows:

Part 1

This applies to the following:

- (a) Care leavers who are sole occupants of a dwelling and who have liability for Council Tax; or
- (b) Dwellings that are solely occupied by care leavers, where one or more of the residents are liable for Council Tax.

Part 2

This part applies to the following:

- (a) Care leavers who are jointly and severally liable with one or more other liable person (s) who is/are not a care leaver.

A reduction in liability will only be applied after the entitlement to other national discounts or reductions have been applied and will only apply to Council Tax liabilities within the West Northamptonshire area.

Reductions for care leavers falling into Part 1 of this scheme.

The Council, under the policy, will reduce the amount of Council Tax payable to nil, after the application of all other discounts or reductions, where a Care Leaver, as defined in the policy, is

solely liable for Council Tax, and any other adult residents in the dwelling also meet the definition of Care Leaver as defined within the policy.

Reductions for care leavers falling into Part 2 of this scheme.

The Council, under this policy will reduce the amount of Council Tax payable, by applying a proportionate reduction , after the application of all other discounts and reductions, dependent upon the number of care leaver and non care leavers in the property that are jointly liable for Council Tax.

For example, if a household had four people residing in it that were jointly liable for council tax and one of those people was a care leaver, the Council Tax bill for the property would be reduced by 25% to reflect the care leaver discount.

7. Implications (including financial implications)

Resources and Financial

- 7.1 There is a cost to the Council in respect of Council Tax discretionary discount awards and this is met by the Council's general fund. The estimated cost of the proposal for 2024-25 is £35,388. These costs are based on Care Leavers residing within West Northamptonshire on 30 May 2023 who are liable for Council Tax. The cost of the scheme has been offset by a reduction in the cost of Council Tax Reduction payable to those Care Leavers, so in overall terms should be cost neutral to the Council. It should be noted that these costs are based on data provided by the Care Leavers team and may be subject to change as the number of care leavers change.
- 7.2 The automatic application of a care leavers discount should also free up some resource which can be used to improve overall council tax collection rates which would be of financial benefit to the council.

Legal

- 7.3 Section 13a (1) c of the Local Government Finance Act 1992, the Council has the power to reduce the amount of Council Tax a person must pay. This includes the power to reduce the amount to nil.

- 7.4 **Risk**
No risks identified

- 7.5 **Consultation and Communications**
Consultation has taken place with the Care Leavers team in the writing of this report. Subject to the outcomes at Council, communications activities will be undertaken to raise wider awareness of the discount and encourage take-up among care leavers.

- 7.6 **Consideration by Overview and Scrutiny**
This proposal has not been considered by Overview and Scrutiny Committee at this stage.

7.7 Climate Impact

No specific impacts have been identified

7.8 Community Impact

No specific impacts have been identified. An equality impact assessment has been carried out for the scheme for 2024-2025. This proposal has a beneficial impact on those residents with protected characteristics.

8. Background Papers

8.1 None

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**West
Northamptonshire
Council**

**West Northamptonshire Council
Council Tax S13A(1)(c)
Local Government Finance Act 1992
Policy**

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1.0 Introduction

- 1.1 The following policy outlines the Council's approach to granting discretionary reductions in liability for Council Tax under S13A (1) (c) of the Local Government Finance Act 1992 (as amended). The Council has the ability to the reduce liability for Council Tax in relation to individual cases or class(es) of cases that it may determine where national discounts and exemptions cannot be applied.
- 1.2 This policy is basically divided into three main areas namely:
- (a) **Council Tax Care Leavers** – this part of the policy covers the decision by the Council to support certain care leavers with their liability for Council Tax.
 - (b) **The Flood Recovery Framework** – this part of the policy covers situations outlined by Central Government where any parts of the Council's area were to be designated as a designated flood area; and
 - (c) **Granting of reductions in Council Tax liability in all other circumstances** - this part of the policy applies to all other circumstances where an application is made to the Council for a reduction in Council Tax liability under S13A(1)(c) of the Local Government Finance Act 1992 other than in respect of (a) and (b) above.

2.0 Legislation

- 2.1 The relevant legislation (S13 of the Local Government Finance Act 1992 as amended by the Local Government Finance Act 2012), states the following:

Reductions by billing authority

- (1) The amount of council tax which a person is liable to pay in respect of any chargeable dwelling and any day (as determined in accordance with sections 10 to 13).
- (a) in the case of a dwelling situated in the area of a billing authority in England, is to be reduced to the extent, if any, required by the authority's council tax reduction scheme.
 - (b) not applicable.
 - (c) **in any case, may be reduced to such extent (or, if the amount has been reduced under paragraph (a) or (b), such further extent) as the billing authority for the area in which the dwelling is situated thinks fit.**
- 2.2 The provisions stated in (c) above, allows the Council to reduce the Council Tax liability for any taxpayer in addition to any application for Council Tax Reduction under the Council's scheme. This is a general power that has always been available to the Council.

3.0 Council Tax Care Leavers Scheme

Introduction

- 3.1 The Council has decided to provide assistance with Council Tax to certain persons who are leaving care. This has been implemented to reflect challenges faced by many care leavers as they learn to budget their finances independently.
- 3.2 Care leavers are a particularly vulnerable group for Council Tax debt, and as they move into independent accommodation and begin to manage their own budget, it can be a challenging time, exacerbated if they fall behind with Council Tax.
- 3.3 The Council wants to support care leavers **up to the age of 21**, by the granting of a discretionary reduction of up to 100% of the Council Tax liability. This means that the Council will be providing financial support to care leavers whilst they develop independent lives and life skills.
- 3.4 Assistance will only be provided to care leavers who reside within the West Northamptonshire Council area.

The Council's Policy in respect of Carer Leavers.

- 3.5 The Council shall operate the scheme as follows.:

Part 1

This applies to the following:

- (a) Care leavers who are sole occupants of a dwelling and who have liability for Council Tax; or
- (b) Dwellings that are solely occupied by care leavers, where one or more of the residents are liable for council tax.

Part 2

This part applies to the following:

- (a) Care leavers who are jointly and severally liable with one or more other liable person (s) who is/are not a care leaver.

- 3.6 A reduction in liability will only be applied after the entitlement to other national discounts or reductions have been applied and will only apply to Council Tax liabilities within the West Northamptonshire area.

Definition of a Care Leaver for the purposes of this scheme

- 3.7 The term 'care leaver' is defined in The Children (Care Leavers) Act 2000 and refers to eligible, relevant, and former relevant children:
- The person is someone for whom West Northamptonshire Council or North Northamptonshire Council (or their legacy Councils) have acted previously as a

corporate parent.

- Relevant children are those young people aged 16 and 17 who have already left care, and who were 'looked after' for at least 13 weeks from the age of 14 and have been 'looked after' at some time while they were 16 or 17; and
- Former relevant children are those young people aged 18, 19 or 20 who have been eligible and/or relevant.

3.8 Care leavers can also be classified as a 'qualifying' care leaver. This category applies to young people who:

- (a) Left care after 1st October 2001, after they had turned 16, but who are not 'eligible' or 'relevant' because they did not fulfil the 13-week criteria.
- (b) Were accommodated, but in residential education, mental/health provision private fostering or Special Guardianship; or
- (c) For the purposes of this policy 'qualifying care leavers' will be treated in the same way as 'care leavers'.

3.9 Additionally former care leavers born before 2001 will be designated as a qualifying care leaver for the purposes of this policy.

Reductions for care leavers falling into Part 1 of this scheme.

3.10 The Council, under this policy, will reduce the amount of Council Tax payable to nil, after the application of all other discounts or reductions, where a care leaver, as defined in this policy, is **solely liable** for Council Tax, and any other adult residents in the dwelling also meet the definition of care leaver as defined within this policy.

Reductions for care leavers falling into Part 2 of this scheme.

3.11 The Council, under this policy will reduce the amount of Council Tax payable, by applying a proportionate reduction after the application of all other discounts and reductions, dependent upon the number of care leavers and non-care leavers in the property that are jointly liable for Council Tax. For example, if a household had four people residing in it that were jointly liable for Council Tax and one of those people was a care leaver, the Council Tax bill for the property would be reduced by 25% to reflect the care leavers discount.

Exclusions

3.12 This reduction will only apply where the property is occupied. No reduction will apply where premises are no one's sole or main residence or where the premises is defined as a second home.

3.13 Where the care leaver is liable for more than one property, the reduction will only be awarded in respect of the dwelling which is deemed to be their sole or main residence.

3.14 Where a care leaver lives in a household and the dwelling would be deemed exempt from Council Tax if the care leaver did not reside at the property, a 100% reduction will be awarded.

- 3.15 For the sake of clarity, no reduction will be granted where the care leaver resides in a House in Multiple Occupation (HMO) or where the care leaver resides in a property for which they are not liable for Council Tax.

Changes in circumstances

- 3.16 The Council may revise any reduction in liability where the applicant's circumstances or situation changes. The leaving care team must advise the Council when someone leaves care by completing the relevant template.

The award and duration of a reduction in liability

- 3.17 Both the amount and the duration of the reduction are at the discretion of the Council and the reduction will be awarded on the basis of the evidence supplied and the circumstances of the individual.

4.0 The Flood Recovery Framework

- 4.1 In a severe weather event with significant wide area impacts, local authorities may need central support to help their communities and businesses return to normal. Building on these principles, a core package of business and community recovery support has been developed by Central Government to serve as a framework for flood recovery funding when needed.
- 4.2 It will be for Government Ministers to determine when this support will be made available. Weather incidents with localised impacts will not usually trigger a recovery support package.
- 4.3 In relation to Council Tax, Central Government have developed a Council Tax discount package that is available under S13A (1) (c). The Council shall operate the scheme strictly in accordance with Central Government guidelines.

Who is eligible for a council tax discount?

- 4.4 Where the Council Tax Discount Scheme is activated following severe weather, The Department for Levelling Up, Housing and Communities (DLUHC) will refund eligible local authorities for granting discounts in the following circumstances:
- (a) 100% discount for a minimum of 3 months, or while anyone is unable to return home if longer, for **primary residences** whereas a result of the relevant weather event:
- Flood water entered into the habitable areas; or,
 - Flood water did not enter into the habitable areas, but the local authority regards that the residence was otherwise considered **unliveable** for any period of time. **AND**

(b) 100% council tax discount on temporary accommodation for anyone unable to return to their home, in parallel with the discount on their primary residence where applicable.

4.5 Second homes and empty homes will **not** be eligible.

4.6 Instances where households might be considered **unliveable** could include:

- where access to the property is severely restricted (e.g., upper floor flats with no access).
- key services such as sewerage, draining, and electricity are severely affected.
- the adverse weather has resulted in other significant damage to the property such that it would be, or would have been, advisable for residents to vacate the premises for any period of time, regardless of whether they do vacate or not.
- flooded gardens or garages will **not** usually render a household eligible but there may be exceptions where it could be demonstrated that such instances mean effectively that the property is unliveable.

4.7 It will be for the Council to determine eligibility under the scheme.

Properties affected by multiple instances of flooding

4.8 Residences impacted in multiple flood events will not be precluded from repeat support where this is made available by Government in respect of separate weather events.

4.9 Where the scheme is activated for two separate instances of flooding within 3 months of each other, the two discount periods will run concurrently. For example, if the second flood event occurred after 2 months, flooded properties already receiving support could be eligible for another 3 months discount, making the total period of reimbursement 5 months.

Funding

4.10 In such cases, Central Government will make payment to the Council via a Section 31 grant.

5.0 Applications for S13A(1)(c) in other cases

5.1 Where the Council receives an application for a reduction in liability in any other case (other than listed within the Central Government sponsored scheme specified above), all applications will be treated on their individual merits.

5.2 In such cases, the Council will require the applicant (where appropriate) to:

- Make a formal application for Council Tax Reduction in an appropriate format.
- Consider potential changes in payment methods and payment arrangements.
- Assist the Council to minimise liability by ensuring that all discounts, exemptions, and reductions are properly granted.

- Maximise their income through the application for other welfare benefits.
- Have taken all reasonable steps to resolve their situation prior to application.
- Provide evidence of exceptional financial hardship or exceptional personal circumstance that would merit a reduction in the Council Tax liability; and
- Not have access to assets, capital or other financial remedy that could be used to meet the Council Tax liability.

5.3 The circumstances affecting the ability to meet Council Tax liability must not be intentional by the applicant and must be deemed to be out of the applicant's individual control.

5.4 If information or evidence requested for the taxpayer has not been received within 21 days from the date of the request, then the Council will determine the application on the basis of the evidence and information in its possession.

5.5 The Council may refuse to award a discount where lack of this information and /or evidence does not enable the Council to reach an informed decision regarding the applicant's circumstances.

6.0 Delegated Powers

6.1 This S13A(1)(c) policy has been approved by the Council. However, the Council's Assistant Director Revenues and Benefits is authorised to make technical scheme amendments to ensure it meets the criteria set by the Council and, for certain defined schemes, Central Government guidance.

7.0 Notification

7.1 The Council will issue a written decision letter or revised demand notice to the applicant within one month of the decision or as soon as practicable thereafter.

8.0 Review of Decisions

8.1 Notwithstanding any reductions applied automatically to the Council Tax account, where any application is refused, the applicant will be notified that they can ask for the decision to be reviewed. Any request for a review must be made, in writing or by email, within one month of the decision letter.

8.2 A relevant officer of the Council shall undertake the review and shall respond within two months and will have regard to any further evidence supplied.

8.3 If the applicant is dissatisfied with the outcome of the review, they can, within two months of the Council's reply, appeal to the independent Valuation Tribunal Service to consider their case.

9.0 Duration of Reduction

- 9.1 The duration of any award will depend on the circumstances of each case. However, in all cases the following principles will apply:
- (a) Where the reduction is applied under a Central Government Scheme, the reduction shall be applied to the Council Tax account for the period specified in Government guidance.
 - (b) In all other cases:
 - (i) the application for the reduction can only relate to the current Council Tax financial year in which the application is made unless the delay was due to an exceptional circumstance; and
 - (ii) If an application is successful, the award period will be specific to the applicant's circumstances, but it cannot exceed a period greater than the financial year it has been awarded in or exceed the total Council Tax charge for that period.

10.0 Changes in circumstances and misrepresentation

- 10.1 A reduction in liability under S13A(1)(c) can be recovered if it has been made as a result of misrepresentation or failure to disclose a material fact, either fraudulently or otherwise. It can also be recovered as a result of the subsequent application of a national discount or adjustment in banding by the Valuation Office Agency
- 10.2 Changes of circumstances that subsequently negate the need for a reduction in liability under this policy will be recovered by the Council. Where this occurs, the Council shall notify the taxpayer accordingly.
- 10.3 Reductions in liability are not transferable following a change in address.
- 10.4 The Council reserves the right to recover any reductions in liability as a result of a change in legislation or regulation.
- 10.5 The Council is mindful that it is important to protect public funds and, as such, will take action to prosecute any case where the applicant acts fraudulently in applying for a reduction in Council Tax liability.

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WEST NORTHAMPTONSHIRE COUNCIL CABINET

14 November 2023

Portfolio Holder for Finance – Councillor Malcolm Longley

Report Title	Local Council Tax Reduction Scheme 2024-2025
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Report Author	Martin Henry, Executive Director, Finance
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List of Approvers

Monitoring Officer	Cath Whitehead	26/10/2023
Chief Finance Officer (S.151)	Martin Henry	26/10/2023
Communications Lead/Head of Communications	Becky Hutson	26/10/2023

List of Appendices

None

1. Purpose of Report

1.1. This report provides members with an update on the Local Council Tax Reduction Scheme (LCTRS) for West Northamptonshire Council (WNC) for the financial year 2023-2024 and asks members of Cabinet to recommend to Council a no change scheme for the financial year 2024-2025.

2. Executive Summary

1.2. The LCTRS must be approved and in place by 31 January each year. The scheme applies to working age claimants only, as the government prescribes the scheme for those of pension age which provides up to 100% support based on the circumstances of the individual.

1.3. On 3 November 2022 Council approved a scheme for 2023-2024 based on 20% minimum payment and with some minor changes to the local regulations relating to benefit uprating.

- 1.4. Members are asked to consider the content of this report and to recommend to Council a LCTRS for 2024-2025

3. Recommendations

- 3.1 It is recommended that the Cabinet:
- a) Notes the contents of this report
 - b) Approves the proposed LCTRS for 2024-2025 as outlined in the report
 - c) Recommends to Council a no change LCTRS for 2024-2025

4. Reason for Recommendations

To enable a Council Tax Reduction Scheme to be agreed for West Northants Council for the financial year 2024-25 to be in place by 31 January 2024

5. Report Background

- 5.1 From April 2013 each Local Authority has been required to determine a LCTRS, which replaced the national Council Tax Benefit scheme. The scheme applies to working age claimants only as the government provides a prescribed scheme (CTRS Prescribed Requirements Regulations 2012) for those of pension age, which provides up to 100% support based on the circumstances of the individual.
- 5.2 Each billing authority has discretion as to their local scheme, including the maximum support available to working age claimants (and the minimum percentage of the Council Tax bill they are required to pay) and the eligibility criteria for the scheme.
- 5.3 In November 2022 members agreed a LCTRS based on a minimum Council Tax contribution for working age claimants of 20% and some minor changes to the local regulations relating to benefit uprating. This scheme has been in place since April 2023.

6. Issues and Choices

Update on the LCTRS for 2023-2024 and impact on Council tax collection

- 6.1 As of June 2022, the total number of people in receipt of LCTRS was 19,294, 11,531 of which are of working age. As of September 2023, the total number of people in receipt of LCTRS is 18,584 with 10,8991 being of working age. The estimated cost of the scheme for 2023-2024 is £19.8m.
- 6.2 Council Tax collection rate for West Northants for 2022-2023 is 96.97% which is an improvement on 2021-2022 collection rate of 96.48%. It also compares well to the national average collection rate of 96.02% and a national average for unitary councils of 96.20%. We continue to monitor the collection rates each month and as of September 2023 the profiled collection rates are 56.92% against a target of 57.74%.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 It is anticipated that the proposal to keep the LCTRS scheme the same for 2024-25 can be contained within existing budgets.

7.2 Legal

7.2.1 The adoption of a Local Council Tax Reduction Scheme for West Northants is a legal requirement and is set out in Council Tax Reduction Scheme (Prescribed Requirements)(England) (Regulations 2012 (as amended by the Council Tax Reduction Schemes (Prescribed Requirements)(England) (Amendment) Regulations 2021).

7.2.2 If the proposal for a no-change scheme is agreed there is no requirement to consult on the LCTRS for 2024-20245

7.3 Risk

7.3.1 There are no significant risks arising from the proposed recommendations in this report.

7.4 Consultation and Communications

7.4.1 No consultation is required if the scheme remains unchanged for 2024-2025. Subject to the outcomes at Council, communications activities will be undertaken to raise wider awareness of the scheme among the public.

7.5 Consideration by Overview and Scrutiny

7.5.1 Not considered by Overview and Scrutiny.

7.6 Climate Impact

7.6.1 No impacts identified.

7.7 Community Impact

7.7.1 No specific impacts have been identified. An Equality Impact Assessment has been carried out for 2024-2025.

8 Background Papers

8.1 None

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WEST NORTHAMPTONSHIRE COUNCIL

CABINET

14 November 2023

**Cabinet Member for Community Safety and Engagement:
Councillor David Smith**

Report Title	Public Spaces Protection Order – Emporium Way
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Report Author	Vicki Rockall, Head of Service for Community Safety and Engagement, victoria.rockall@westnorthants.gov.uk
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Contributors/Checkers/Approvers

Monitoring Officer	Catherine Whitehead	26/10/2023
Chief Finance Officer (S.151)	Martin Henry	26/10/2023
Other Director/SME	Stuart Timmiss	22/8/2023
Communications Lead/Head of Communications	Becky Hutson	26/10/2023

List of Appendices

Appendix 1 – Emporium Way location map and alternative routes

Appendix 2 – Draft Order

Appendix 3 – Consultation results (available on request from Democratic Services
(democraticservices@westnorthants.gov.uk))

1. Purpose of Report

- 1.1. To agree to make a Public Spaces Protection Order (PSPO) under the Anti-Social Behaviour, Crime & Policing Act 2014 to restrict access to the Council-owned walkway, known as Emporium Way, that connects the north of the Market Square to Greyfriars, Lady's Lane and the Mayorhold Car

park.

2. Executive Summary

- 1.2. This report sets out the background for making a PSPO and the legal requirement to consult as well as the financial and legal implications of doing so. The report demonstrates the long-standing issues in the walkway, known as Emporium Way, and makes the recommendation to close the walkway and underpass by way of a Public Spaces Protection Order, initially for a period of three years.

3. Recommendations

- 3.1 It is recommended that Cabinet:
- a) Authorises the Executive Director Place and Economy to make a PSPO to restrict public access to the walkway known as Emporium Way in accordance with the results of the consultation as detailed in Appendix 3 and to carry out any outstanding legal requirements prior to it coming into force.
 - b) Approve that the PSPO is brought into force once the gates and hoardings restricting access to Emporium Way have been installed, which cannot be arranged until the decision whether to make the Order has been made.

4. Reason for Recommendations

- 4.1 A decision to approve the proposal will support the priorities of the Community Safety Partnership.
- 4.2 The recommendation is the preferred option of both partners and majority of members of the public responding to the consultation.

5. Report Background

- 5.1 The Anti-Social Behaviour, Crime and Policing Act 2014 provides local authorities and the Police with the powers to tackle anti-social behaviour and provide better protection for victims.
- 5.2 Since the introduction of the Anti-Social Behaviour, Crime and Policing Act 2014, gating of a highway can now be achieved by the making of a PSPO, simplifying the process and significantly reducing the financial outlay.
- 5.3 Public Spaces Protection Orders (PSPOs) are designed to stop all individuals, or a specific group of persons, committing Anti-Social behaviour in a public space. The criteria that must be satisfied when considering whether to make a PSPO is whether a particular activity or activities has or is likely to have a detrimental effect on the quality of life of those in the locality, that the activity is, or is likely to be, persistent or continuing in nature and unreasonable, and any restriction is justified.

- 5.4 PSPOs provide councils with a flexible power to implement local restrictions to address a range of Anti-Social behaviour issues in public places in order to prevent future problems.
- 5.5 It is important that PSPOs are used proportionately and that they are not seen to be targeting behaviour of children / young people where there is a lack of tolerance and understanding by local people.
- 5.6 A PSPO can be made for a maximum of three years. The legislation provides for the Order to be extended at the end of the period, but only for a further period of up to three years. However, Orders can be extended more than once. Local authorities can increase or reduce the restricted area of an existing Order, amend or remove a prohibition or requirement, or add a new prohibition or requirement. They can also discharge an Order. The variation or discharge of an Order are subject to statutory consultation requirements.
- 5.7 Enforcement may be shared between the Council and the Police. Breach of a PSPO is a criminal offence which can result in the issuing of a Fixed Penalty Notice (FPN) or a prosecution resulting in a fine of up to £1,000 on conviction. Enforcement can be undertaken by Council Officers, any person designated by a local authority for the purpose of issuing fines for breaches of a PSPO, and Police Officers.
- 5.8 Before making the Order, the local authority must notify people who are potentially affected by the proposed Order of how long they have to make representations, and consider any representations made.
- 5.9 West Northants Council approved the proposal to restrict public access to and gate off Francis Jetty in November 2022 and since its closure in May 2023 there has been a complete reduction in crime in the jetty.
- 5.10 Other problem public rights of way such as alleyways have been closed using the same legislation and have proved to have a positive impact on the community.

6. Issues and Choices

- 6.1 For many years, Emporium Way has been used as a place to conduct illicit activities, away from the scrutiny of passing pedestrians and other capable guardians such as the Police and wardens. Due to the low ceiling height in the underpass and layout of the alleyway, CCTV coverage is very limited and often tampered with.
- 6.2 Over the past six months a significant rise in crime and Anti-Social behaviour was raised by Northamptonshire Police and brought to the attention of the partnership group. Additional police presence was introduced alongside the disruption of the drug lines targeting children, and youth outreach provided by local youth providers. However, without constant police presence the issues continue to return.
- 6.3 Crime Data provided by Northants Police shows 20 recorded crimes from September 2021 to August 2023, increasing from 4 crimes between Sept. 2021 – Aug 2022 to 16 crimes in the same period the following year.

- 6.4 In addition, during the same two-year period 19 incidents were also recorded. Again, there has been an increase from 6 incidents between Sept 2021 – Aug 2022 to 13 incidents for the same period.
- 6.5 Northants Police Solar Team have reported 3 recent serious sexual offences in the alleyway; one guilty plea for an offence taking place in 2021 and two crimes currently under investigation from 2022 and 2023.
- 6.6 Issues witnessed by CCTV operators on a regular basis include; groups of young people causing criminal damage and Anti-Social behaviour, people buying, selling and using drugs and as a cut through for shoplifters, street drinkers and addicts to go from the town over to Oasis House and the Mounts area. In addition, the area is regularly used as a toilet, attracts vermin has been the location of numerous assaults.
- 6.7 There are two roaming cameras located in Emporium Way but due to the height of the space one is regularly vandalised.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 A PSPO can be enforced by both the Police and Council. The Council will be the agency to process the Fixed Penalty Notices (FPNs), regardless of which agency issues them. The approach to this will be agreed with the Police.
- 7.1.2 Any income generated by payment of FPNs for a PSPO must be directed back into management of the PSPO process.
- 7.1.3 There is a financial implication for the purchase of the hoarding, installation and vinyl cover in the conservation area. The estimated cost is £7,500, this is likely to be funded jointly by WNC's Community Safety budget and through a matched contribution by the OPFCC.
- 7.1.4 The cost of the hoarding and installation will be jointly funded by the Community Safety budget, regeneration and supported by the Office of Police Fire and Crime Commissioner. Any maintenance required will be funded through the PSPO Fixed Penalty Notice pot.
- 7.1.5 In the past year there have been 11 callouts for the cameras costing £935 plus VAT over the year. 5 of these call outs took place in August/September 2023. In addition, the camera had to be replaced following vandalism in March 2022 at £1475 plus VAT.
- 7.1.6 A considerable amount of capital funding is currently being invested in Northampton Town Centre, with over £10million being invested in the adjacent Market Square. Emporium Way is located between the Market and the Greyfriars site, which has been derelict since 2015 but with current plans for WNC to appoint designers to provide significant large-scale development.
- 7.1.7 The choice of materials is the most cost-effective solution for a temporary structure compared with the cost of permanent gates.

7.1.8 Highways are currently uncertain as to whether Emporium Way has ever been formally adopted as part of the public highway and the land itself is owned by the Council. If it is not part of the public highway, then there would be no requirement for a PSPO to be made in order to restrict access to it. The Council as a private landowner could simply fence off the area. However, due to the fact that it appears to have been regularly used by the public as a right of way for at least the last 20 years, whether the Council has expressly or impliedly permitted that, it is thought that the best approach is to err on the side of caution and treat it as if it were part of the public highway.

7.2 Legal

7.2.1. Public Spaces Protection Orders can be made by local authorities only if they are satisfied on reasonable grounds that two conditions are met, which are

- i) Activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality or it is likely that they will be carried within that area and that they will have such an effect and
- ii) The effect of the activities is, or is likely to be, of a persistent or continuing nature such as to make the activities unreasonable and this justifies the restrictions imposed by the Order.

7.2.1 There is a requirement for the Council to carry out a statutory consultation with the local Police force and any appropriate community representatives, as well as any owner or occupier of land within the proposed restricted area. In relation to proposals to restrict access to land, persons potentially affected must also be notified of the proposed PSPO and the period within which they may make representations about it. The Council has a legal duty to "consider" any representations received with regard to a proposed PSPO

7.2.2 In the context of this proposed PSPO, that includes owners and occupiers of adjoining or adjacent land who may have rights of access to the proposed restricted area. The reason for this is that a PSPO may not restrict a public right of way for the occupiers of premises adjoining or adjacent to a highway or where the right of way is the only or principal means of access to a dwelling.

7.2.3 The making of a PSPO can be challenged in the High Court by any interested person living within the restricted area or who works in or visits that area, within 6 weeks of it being made. The grounds on which an Order may be challenged are that there was no power to make it, that the particular prohibitions or requirements are unjustified or unnecessary or that there has been some defect of procedure in making it, which has substantially prejudiced the interests of the interested person.

7.2.4 When making a PSPO, a Council must have particular regard to the rights of freedom of expression and freedom of assembly set out in the European Convention on Human Rights.

7.2.5 The Crime and Disorder Act 1998 places a statutory duty on all local authorities to work in partnership with statutory, non-statutory, community and voluntary agencies to develop and implement strategies and policies for tackling crime and disorder.

7.2.6 Under Section 17 (1) (a) of the Crime and Disorder Act 1998, the Council has a statutory

“exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it can to prevent ... crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment’.

7.2.7 An Equality Impact Assessment screening has been completed, no issues have been raised.

7.2.8 There are no significant risks arising from the proposed recommendations in this report.

7.3 Consultation and Communication

7.3.1 For the proposed area to be restricted, there is a requirement for the Council to undertake a statutory public consultation exercise with the following, as a minimum:

- (a) The chief officer of police, and the local policing body for the area;
- (b) Whatever community representatives the local authority thinks it appropriate to consult;
- (c) The owner or occupier of land within the area;
- (d) The parish council or community council (if any) for the area; and
- (e) The county council (if any) for the area.

7.3.2 On 22 August 2023, the Executive Director of Place and Economy authorised the undertaking of a public consultation on the proposed making of a PSPO restricting public access to Emporium Way.

7.3.3 The 4-week public consultation ran from 23 August 2023 to 19 September 2023. The consultation survey was hosted on the West Northants Council -consultation hub and promoted via the Council’s media channels. The consultation was circulated to local media and stakeholders, including West Northants Residents Panel and members of the West Northants Consultation Register.

Internal and external stakeholders and partners consulted include:

- Legal Service, WNC
- Environmental Health and Licensing, WNC
- Northants Police
- Crime Prevention Design Advisors, Northants Police
- Northants Fire and Rescue Service
- Conservation, WNC
- Planning Services, WNC
- Highways, WNC
- Northampton Business Improvement District
- Office of the Police, Fire Crime Commissioner
- Community Safety, WNC
- Regeneration, WNC
- Northampton Town Council
- Grosvenor Centre

- Northampton Business Improvement District (BID)

7.3.4 Northants Police offers full support for the proposals. They request the area is closed from public access, until such a time that it may be regenerated. This is due to the poor design, the unsafe and unsecured buildings being accessed regularly, and the high levels of crime in the area.

7.3.5 In addition, the Detective Inspector for Serious Sexual Offences responded to say that this is a place where vulnerable people can be easily enticed by people who wish them harm. The victims may feel a sense of safety as a result of its proximity to an area of high footfall. However, the alley itself is secluded and not visible.

7.3.6 CCTV operators continue to witness crime and anti-social behaviour on a regular basis in Emporium Way, as well as the cameras being repeatedly vandalised, and are in support of the proposal to close the walkway.

7.3.7 Northamptonshire Fire and Rescue Service highlighted the need for any adjacent buildings with fire escapes leading through Emporium Way to have means of releasing themselves from the area. On these recommendations, quotes have been obtained to include a fire exit onto Sheep Street.

7.3.8 Conservation officers at WNC advised that the south entrance via Market Square is within the All Saints Conservation area and any long-standing barrier would need to be of an appropriate style. As a result, we have revised plans to include vinyl covering reflecting the conservation area to improve the overall look should the Market Square reopen prior to other works being completed and the restrictions reviewed.

7.3.9 The public responses to the consultation overall, support the proposal for the PSPO at Emporium Way to prevent crime and anti-social behaviour, with 68% in favour of restricting public access to the highway for 24 hours a day, 7 days a week, as opposed to 25% against, and 7% with no opinion.

7.3.10 Most respondents believe anti-social behaviour and crime are an issue in Emporium Way, 68% compared to 11% who believe it is not, and 20% who are unsure. 40% had personally witnessed ASB or illegal activity in the walkway, with a further 3% who would rather not say compared to 56% of people who had not.

7.3.11 When asked how safe they felt using Emporium Way, 65% did not feel safe, with 41% stating they felt very unsafe and 24% unsafe, compared to 15% feeling safe, or very safe.

7.3.12 54% of respondents state that the behaviours they have witnessed in Emporium Way always impact on their experience of the town centre whilst a further 35% say it sometimes does, compared to just 10% for whom it has no impact on their experience.

7.3.13 When asked if they agreed with the alternative acceptable routes, 64% of people agreed, 19% disagreed, and 17% neither agreed nor disagreed or had no opinion.

7.3.14 Several responses described their experience of issues as lone females, including feeling scared, being harassed and public indecency/exposure by men urinating in the alley.

7.3.15 In addition to questions around safety, the consultation asked what the public would like to see made of the space in future. Whilst several comments suggested it could never be made useful, others highlighted the need to improve the space to reflect the adjacent developments and investment to ensure businesses come into the town. Suggestions included:

- Physical improvements such as better lighting and cameras
- Community gardens, a park or green space
- Urban skate park
- Market stalls, Street Food space with seating
- Retain the ability to close it overnight
- Public art gallery space
- Change the above road layout to open up the space.

7.3.16 Subject to its approval, the PSPO will be communicated to local communities and other relevant stakeholders through the Council's designated channels to ensure wider public awareness. All PSPOs are also published on West Northants Council website.

7.4 Consideration by Overview and Scrutiny

7.4.1 None.

7.5 Climate Impact

7.5.1 None.

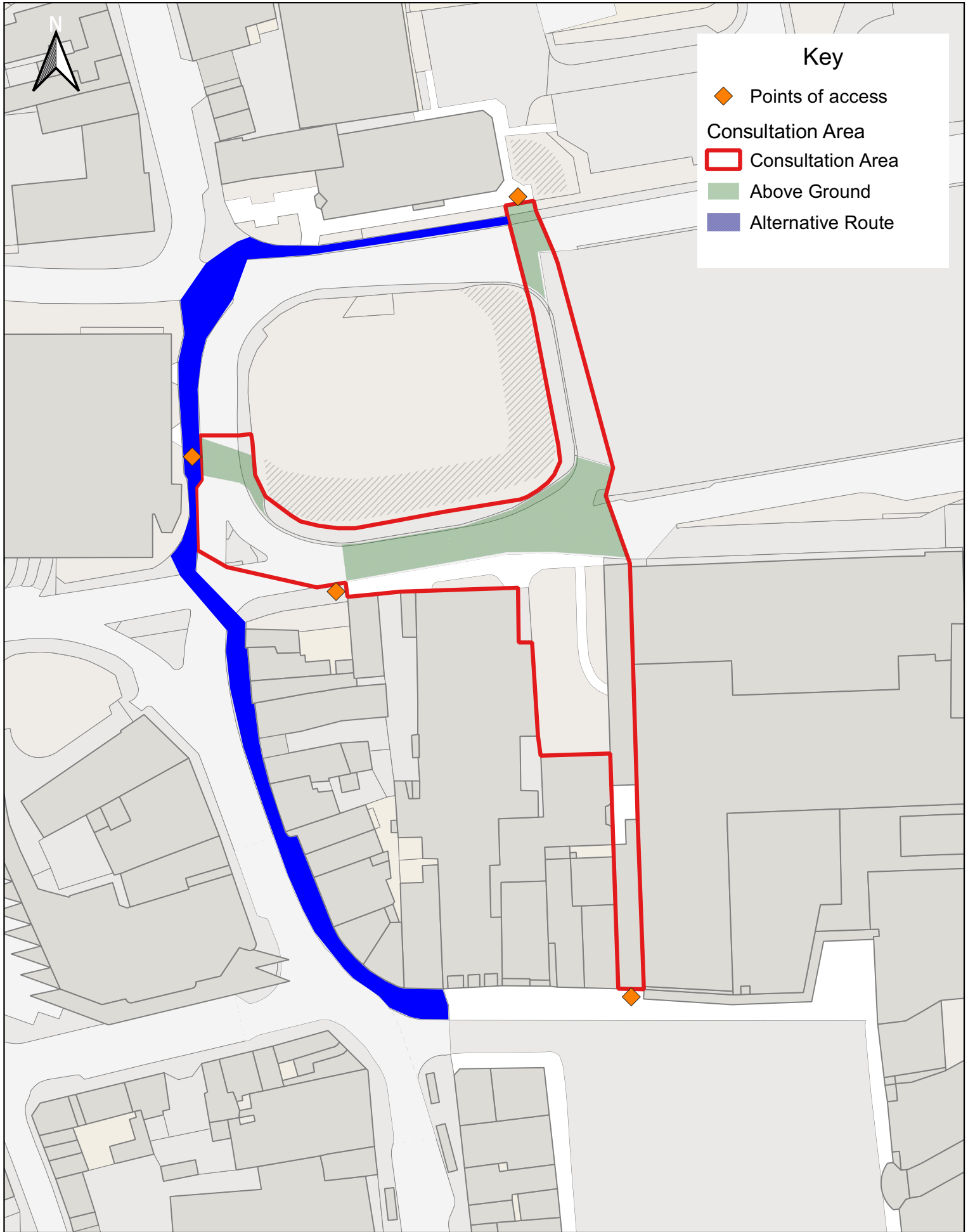
7.6 Community Impact

7.6.1 One of the Council's priorities is for "safer communities with less Anti-Social behaviour" and the proposed PSPO will contribute towards this priority.

7.6.2 Equality impact Screening assessment completed to assess the impact on a range of communities, no issues raised.

8. Background Papers

8.1 Anti-Social Behaviour, Crime and Policing Act 2014: Reform of Anti-Social Behaviours Powers Statutory Guidance for Frontline Professionals.



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WEST NORTHAMPTONSHIRE COUNCIL

PUBLIC SPACES PROTECTION ORDER (EMPORIUM WAY) 2023

West Northamptonshire Council, in exercise of its powers under Section 59, 64 and 72 of the Anti-Social Behaviour, Crime & Policing Act 2014 ('the Act'), hereby makes the following Order, which shall be known as the "West Northamptonshire Council Public Spaces Protection Order (Emporium Way) 2023":-

1. This Order shall come into operation on (Date) 2023 and shall have effect for a period of 3 years thereafter, unless extended by further orders under the Council's statutory powers or those of any successor Local Authority.
2. This Order relates to Emporium Way, which connects the north of the Market Square to Greyfriars, Lady's Lane and the Mayorhold car park in Northampton, as shown marked red on the attached plan ('the Restricted Area').
3. The effect of this Order is to restrict the public right of way over the Restricted Area for 24 hours per day, 7 days per week and 52 weeks per year.
4. Breach of this Order is a criminal offence, for which an offender is liable on summary conviction to a fine not exceeding level 3 on the standard scale (£1000), under section 67 of the Act.
5. A Constable or Authorised Person may issue a Fixed Penalty Notice ("FPN") of not more than £100 to a person they reasonably believe has breached this Order, in accordance with section 68 of the Act, as an alternative to prosecution for an offence under section 67 of the Act if paid within 14 days of being issued.
6. The alternative route for pedestrians between the Market Square to Greyfriars, Lady's Lane and the Mayorhold car park is shown marked blue on the attached plan.
7. Responsibility for the maintenance of any fences and gates will lie with West Northamptonshire Council of One Angel Square, Angel Street, Northampton, NN1 1ED.
8. Police, Fire and Ambulance emergency services, statutory undertakers with equipment situated under, over, along or in the highway, Council Officers and other persons

authorised by the Council, shall be exempt from the provisions of this Order. Business premises with their only or principle means of access adjacent to the highway shall also be exempt from the provisions of this Order during periods when the premises are normally used for business purposes.

9. The Council is satisfied that the conditions set out in Sections 59, 64 and 72 of the Act have been satisfied and that it is in all the circumstances expedient to make this Order for the purposes of reducing anti-social behaviour and criminal offences taking place in the Restricted Area. The Council makes the Order because the anti-social behaviour has had a detrimental effect on the quality of life of those in the locality. The effect or likely effect of this is of a persistent or continuing nature such as to make this unreasonable and justifies the restrictions imposed by the Order.
10. In consulting upon the prohibitions within this Order and upon making it, the Council has had particular regard to the rights of freedom of expression and freedom of assembly as set out in Articles 10 and 11 of the European Convention on Human Rights.
11. If any interested person desires to question the validity of this Order on the grounds that the Council had no power to make it or that any requirement of the Act has not been complied with in relation to this Order, he or she may apply to the High Court within the period of six weeks from the date on which this Order is made.

Signed

Name

Role

For and on behalf of West Northamptonshire Council

Dated



WEST NORTHAMPTONSHIRE COUNCIL CABINET

14 NOVEMBER 2023

**Cabinet Member For Environment, Transport, Highways And Waste:
Councillor Phil Larratt**

Report Title	Active Travel Fund 4 - Connecting the Active Quarter – Access for All, Northampton
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Report Author	Esme Cushing, Principal Transport Planner Esme.Cushing@westnorthants.gov.uk
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List of Approvers

Monitoring Officer	Sarah Hall	26/10/2023
Chief Finance Officer (S.151)	Martin Henry	26/10/2023
Other Director	Stuart Timmiss	19/10/2023
Communications Lead/Head of Communications	Becky Hutson	26/10/2023

List of Appendices

Appendix A – Location plan

1. Purpose of Report

- 1.1. To note and accept the Active Travel Fund Tranche 4 (ATF4) funding awarded by the Department for Transport to build the Connecting the Active Quarter – Access for All scheme in Northampton.
- 1.2. To seek delegated authority to the Executive Director of Place, Economy and the Environment and in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste to take all operational decisions necessary to implement the active travel scheme.

2. Executive Summary

- 1.3. The Active Travel Fund is part of the Government £2 billion commitment set out in [Gear Change](#) to deliver a step change in the provision of active travel and better streets for everyone, helping to promote health travel, reduce emissions and grow the economy. There have been four tranches of funding.
- 1.4. The first tranche of funding was announced in May 2020 during the early months of the Covid-19 pandemic and was known as the Emergency Active Travel Fund and was used to implement temporary measures across Northamptonshire, which have now been removed.
- 1.5. In November 2020 Northamptonshire County Council was awarded £1.066m capital funding and £266,570 revenue funding for Active Travel Fund Tranche 2 (ATF2). Following strong opposition from residents and businesses to an original proposal to convert Billing Road into a one-way road, the Council have worked with the Department for Transport to revise the proposal and develop an alternative.
- 1.6. The Abington Area Active Travel scheme now seeks to improve Abington Park Crescent, Bridgewater Drive, Park Avenue South and the Billing Road/ Rushmere Road junction in Northampton.
- 1.7. Consultation on the Abington Area Active Travel scheme was carried out in late spring 2023, a consultation report is currently being prepared and will be published on the Council's website. In line with legacy procedures in place at that time, the ATF2 scheme was not part of a formal decision-making process.
- 1.8. The funding allocations for Active Travel Fund Tranche 3 (ATF3) were confirmed in May 2022. The Council did not submit a bid so did not receive an allocation.
- 1.9. In February 2023 the Department for Transport (DfT) announced Tranche 4 (ATF4) to support improving walking and cycling infrastructure across the country.
- 1.10. ATF4 is a single year grant funding for the 2022/23 financial year for construction of walking and cycling schemes in 2023/24, with a requirement that the funding must be committed by March 2024.
- 1.11. Following a bidding process, in March 2023 the Council was awarded £642,871 for the capital construction of a 1300m traffic-free route, accessible for walking, wheeling and cycling at Delapre Abbey and associated supportive infrastructure (secure cycle parking facilities, wayfinding/directional signage, benches and information boards). In addition, £30,443 revenue funding was awarded to be spent on monitoring and evaluation, stakeholder engagement, consultation, and marketing.

3. Recommendations

- 3.1 It is recommended that the Cabinet:

- a) Notes and accepts the ATF4 funding to deliver the Connecting the Active Quarter – Access for All scheme, Northampton
- b) Delegates authority to the Executive Director of Place, Economy and the Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste to take all operational decisions necessary to implement the active travel scheme at Delapre Abbey as outlined in 1.6 above.

4. Reason for Recommendations

- 4.1 To ensure the ATF4 grant award is spent within the award timescales and for the permitted purposes.

5. Report Background

- 5.1 At the Cabinet meeting held in January 2023, the Council formally endorsed a pioneering place-shaping Active Quarter in Northampton, a collaborative partnership of key public, third sector and private stakeholders who have come together around a shared ambition to pioneer active travel in the south-west area of Northampton.
- 5.2 The vision outlined a list of short, medium and long-term plans to deliver a zone supporting physical activity, health and wellbeing. One of the short-term schemes identified in the Active Quarter Vision was completion of the link between Delapre Abbey and Brackmills Industrial Estate.
- 5.3 On 6th February 2023 the Department for Transport (DfT) announced a funding competition that sought to support improving walking and cycling infrastructure across the country, called the Active Travel Fund Tranche 4 (ATF4). Bids had to be submitted by 24th February 2023.
- 5.4 The objectives of the fund are to:
 - Create a local authority capital investment programme that optimises delivery of 2025 and 2030 objectives, as set out in the statutory Cycling and Walking Investment Strategy (CWIS 2):
 - 50% of short urban trips in England to be walked, wheeled or cycled by 2030
 - Increase active travel from 41% in 2018 to 46% of short urban trips by 2025
 - Increase walking to 365 stages per person per year by 2025
 - Increase cycling from 0.8 billion stages in 2013 to 1.6 billion stages in 2025
 - 55% of primary school-aged children to walk to school by 2025
 - Align investment with Gear Change and wider Government objectives, including local growth and productivity, tackling public health issues, decarbonisation, levelling up and cost of living challenges.
 - Increase participation in active travel amongst underrepresented groups.
- 5.5 Due to the timescales involved, it was agreed in consultation with the Cabinet Member for Environment, Transport, Highways and Waste to submit the Connecting the Active Quarter – Access for All scheme as our priority construction scheme. The scheme will provide a new 1300m traffic-free route, accessible for walking, wheeling and cycling within Delapre Abbey, alongside cycle parking, signage and wayfinding.

- 5.6 The location of the traffic free routes is shown in Appendix A.
- 5.7 Following the bidding process, in March 2023 the Council was awarded £673,314.
- 5.8 Once built, the scheme will enable residents living in Far Cotton and the town centre to connect with employment opportunities in Brackmills Industrial Estate as well as connecting with other key amenities in the Active Quarter such as the University of Northampton and Northampton Mountain Bike Park.
- 5.9 The project will support economic growth by increasing the labour market that can access employment at the Brackmills Industrial Estate for example, delivering on the Council's strategic priorities to help existing businesses to develop, grow and to encourage new businesses to locate in Northampton.
- 5.10 The scheme also contributes towards the Council's Public Health 'Live Your Best Life' vision and supports the wider social prescribing/ cycle hub project based at Delapre Abbey to support mental and physical wellbeing.
- 5.11 The project will provide safe, attractive alternatives to help encourage people out of private cars, tackling congestion and improving air quality, particularly sections of the London Road which are within an Air Quality Management Area (AQMA).
- 5.12 Encouraging a switch to active travel will also contribute towards the Council's strategic target of becoming net zero by 2045.

6. Issues and Choices

- 6.1 A key requirement for ATF4 was that the funding be used to construct schemes that were at detailed design stage and 'shovel ready' with a requirement that funding must be committed by March 2024 (either construction by this date or contract in place with construction following as soon as possible).
- 6.2 The Council had previously been successful in securing funding for feasibility design for the Connecting the Active Quarter - Access for All scheme, and so design work was well advanced.
- 6.3 There were no alternative schemes that were considered to be at a sufficient level of design to meet the funding criteria.
- 6.4 The cost estimates for the Connecting the Active Quarter – Access for All scheme closely aligned with the indicative allocation from Active Travel England.
- 6.5 An Equality Screening Assessment has been completed. No negative impacts on protected groups were identified, so there is no requirement to complete a full Equality Impacts Assessment.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The project is fully grant funded. To meet the grant requirements, the scheme needs to be constructed by March 2024 or committed (contract in place) by this date, with construction following soon after.
- 7.1.2 The works are to be awarded in two contracts. The first will incorporate the paths and cycle shelter. The second will be for the wayfinding and other signage.
- 7.1.3 Procurement for the tracks and cycle shelter has already commenced. If the works exceed the available budget, then the scheme will be value-engineered to meet the available budget.
- 7.1.4 The path construction will be sufficiently robust and durable for the proposed use that future maintenance will be minimal until later years (probably no significant maintenance needed for 10 years).
- 7.1.5 Any significant maintenance that is required in later years will be considered as part of the Medium Term Financial Plan. Should there be any change to the tenure of the grounds/woodland in the future, then responsibility for maintenance would be the responsibility of the new tenant.

7.2 Legal

- 7.2.1 Development of the Active Quarter within Northampton including application of the ATF4 for the construction of a 1300m traffic-free route, accessible for walking, wheeling and cycling at Delapre Abbey and associated supportive infrastructure, will contribute towards the Council's Public Health 'Live Your Best Life' vision and support the cycle hub project at Delapre Abbey to support mental and physical wellbeing.
- 7.2.2 Implementation of the identified scheme will be monitored.

7.3 Risk

- 7.3.1 Financial risks: if the scheme is not delivered within time and deadlines are not met, the Council risks grant clawback and loss of external funding and faces increased costs such as further inflationary pressure and abortive costs to date.
- 7.3.2 Reputational risks: If the scheme is not delivered within time and to budget it could affect the Council's position to secure funding from Active Travel England as future allocations are linked to demonstrating delivery. There would also be reputational damage with the public, as the scheme has already been announced including broad timescales for works.

7.4 Consultation and Communications

- 7.4.1 Consultation was carried out as part of the planning application process. Responses were received from several interested parties including Far Cotton and Delapre Community Council, Battlefields Trust as well as local residents and other interested parties.

- 7.4.2 Far Cotton and Delapre Community Council were generally supportive and welcomed the improved access for wheelchair users and those using mobility scooters. The Community Council did however note concerns raised by equestrians about using the surfaced paths.
- 7.4.3 The Battlefields Trust were also supportive of the aims of the proposal but raised concerns about maintaining the integrity of any extant archaeology relating to the battle of Northampton.
- 7.4.4 Some consultation responses highlighted concerns around the paths being shared by different user groups.
- 7.4.5 As a result of the consultation responses, further detail was provided on the unsurfaced paths that will remain open to equestrians if they do not want to use the new surfaced paths. The construction methodology used will not disturb the topsoil. The shared paths are designed to be of sufficient width to enable shared use. Signage will be used to encourage people to 'share with care'.
- 7.4.6 Further consultation will be undertaken in due course on the wayfinding signage.
- 7.4.7 Planning permission for the paths and cycle storage was granted on 22 September 2023.
- 7.4.8 The Council will continue to work with Active Quarter partners to deliver communications to promote the objectives and outcomes within the report.

7.5 **Consideration by Overview and Scrutiny**

- 7.5.1 Any requests from the Scrutiny Committee will be responded to, and formal engagement or presentations required will take place.

7.6 **Climate Impact**

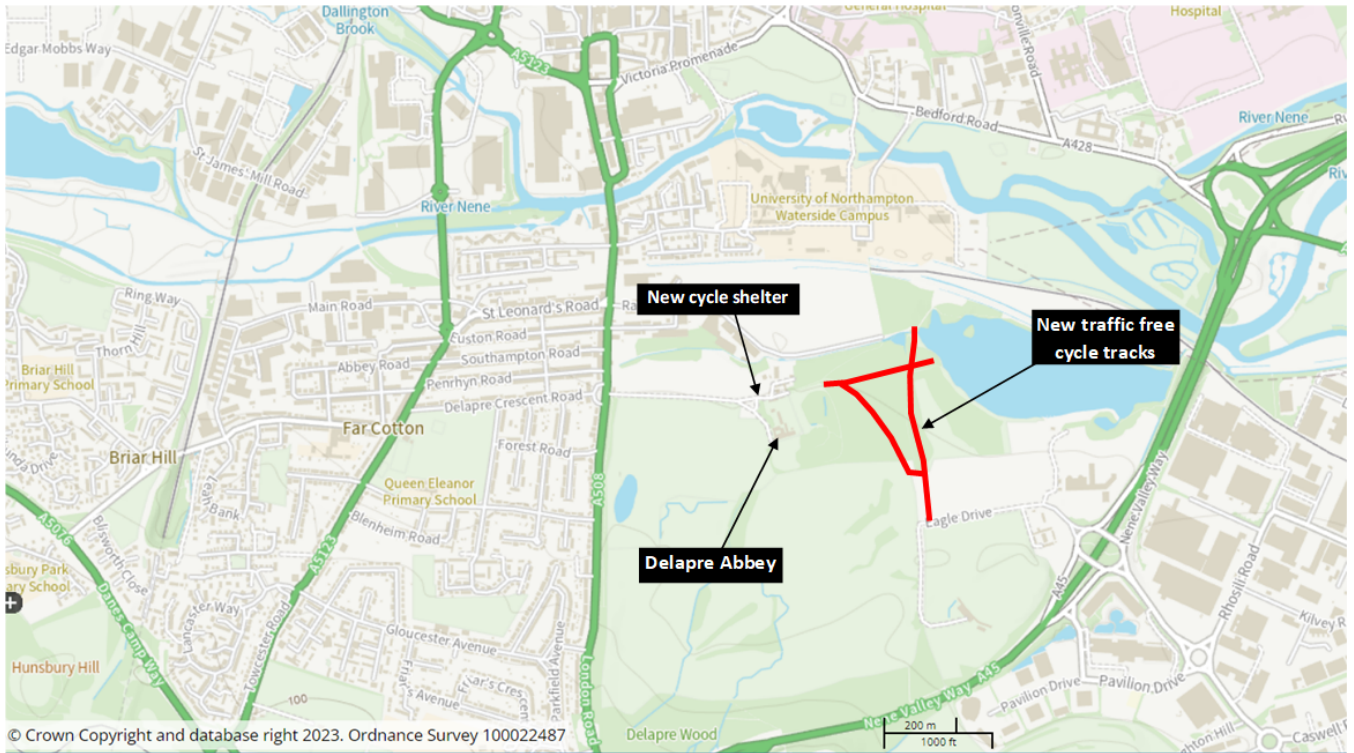
- 7.6.1 The construction of the traffic free paths will have an environmental impact, but this will be mitigated as far as possible with minimal disturbance of the topsoil and no impact on tree roots. This will also be offset in the long term as the scheme will provide a safe and attractive alternative to the private car, that will encourage more people to walk, wheel and cycle which will help tackle congestion, improve air quality and reduce carbon emissions.

7.7 **Community Impact**

- 7.7.1 The aim of the project is to support the delivery of the Active Quarter in Northampton, to provide links to green spaces to contribute to people's health and wellbeing, but also provide connectivity for those living in Far Cotton to access Brackmills Industrial Estate for employment. Improving the paths so they can be used all year round by everyone will also help to grow a community within Delapre Abbey as it will support the provision of led cycle rides and walking groups.

8. **Background Papers**

Appendix A – Location plan of cycle shelter and cycle tracks



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WEST NORTHAMPTONSHIRE COUNCIL COUNCIL

14th November 2023

Cabinet Member for Economic Development, Town Centre Regeneration and Growth: Cllr Daniel Lister

Report Title	Acquisition of Former Bus Depot
Report Author	Kevin Langley Head of Major Projects and Regeneration
	Deven Efde Regeneration Manager

List of Approvers

Monitoring Officer	Catherine Whitehead	10/11/2023
Chief Finance Officer (S.151)	Martin Henry	10/11/2023
Other Director	Stuart Timmiss	
Communications Lead/Head of Communications		

1. Purpose of Report

- 1.1 This report seeks to notify Cabinet of the decision taken by the Leader of the Council to approve the acquisition of the Former Bus Depot in Northampton for a regeneration scheme.

2. Executive Summary

- 2.1 The Local Government Act 2000 Section 9E provides that the Leader of the Council can take any executive decision alone or with his Cabinet. In West Northants the vast majority of Executive decisions, not otherwise delegated, are taken collectively by the Leader and Cabinet together but in cases of urgency the Leader of the Council can take decisions where it is necessary. **Page 413**

3. Recommendations

- 3.1 That Cabinet note the decisions taken by the Deputy Leader of the Council set out at Appendix A and Appendix B.

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 Council.
- 4.2 The decision taken provided the authority for the Council to:
- a) establish a capital budget of £3.3m for the purchase of the Former Bus Depot land and buildings at St James, Northampton
 - b) approve the acquisition of the Former Bus Depot for the delivery of a regeneration scheme.
- 4.3 Full reasons for the decision taken are set out in the decision records appended to this report.

5. Report Background

- 5.1 The tram, later bus, depot on St James' Road, Northampton was developed by the Northampton Corporation, passed to Northampton Borough Council in 1974, and with the sale of the Northampton Bus Company passed into the ownership of Stagecoach. In 2014, it was acquired with the assistance Northampton Borough Council (which briefly held the ownership) by Church's Shoes for the purpose of extending Church's manufacturing capacity. The site has been vacant for over ten years and is contributing to a negative perception and environment for the town. Church's did not develop the site as intended and decided to market it for sale
- 5.2 The primary benefit of acquiring the site is to have full control over what development and uses can take place on the site in future.
- 5.3 The site sits on the boundary of Sixfields and Dallington & Spencer wards. There are areas of high deprivation surrounding the site within the Spencer and St James neighbourhoods. The former is the second most deprived and the latter the seventh most deprived within the whole of West Northamptonshire. Both are within the top 5% most deprived neighbourhoods nationally.
- 5.4 There is the potential to deliver a benchmark, exemplar scheme that sets a new standard in the local area within affordable and mixed housing tenures. The Council would seek to use the site to raise the standard in terms of design and sustainability. This will need to be tested as the scheme for the site is developed as there may be a trade-off between the quality that can be delivered, and the costs incurred.

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 maximum financial exposure for the delivery of a housing led scheme is currently assumed to be £1.8m (based on a 'worst case' resale value of £1.5m with £0.3m of costs). If the council choose to sell the land for commercial uses then this loss would be mitigated. This should be treated as the cost of being able to own, control and regenerate the site as the Council wishes. Without incurring this cost the Council would have no control over the site and is informed that it would likely to be used for logistics and open storage which goes against what the council is seeking to achieve for this area of Northampton.

7.3 There is a strong expectation of significant grant funding to assist in the redevelopment of this site going forward.

7.4 Legal

7.5 Section 120 of the Local Government Act 1972 authorises the Council to purchase land by agreement:

“For the purposes of:

- a) any of their functions under this or any other enactment, or
- b) the benefits, improvement or development of their area”

7.6 The general power of competence in the Localism Act 2011 provides the Council with the power to do anything that individuals generally may do subject to the restrictions and/or limitations which are specified in the Act.

7.7 In addition, section 111 of the Local Act 1972 provides the Council with the power to do anything (whether or not involving expenditure, borrowing, or lending of money or the acquisition disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to the discharge of any of the Council's functions.

7.8 Risk

7.9 Risks associated with the acquisition and the delivery of a regeneration scheme are set out in Appendix C.

7.10 Consultation and Communications

7.10.1 This is a commercial acquisition and is not appropriate for consultation.

7.11 Consideration by Overview and Scrutiny

7.11.1 There has been no consultation with Scrutiny in relation to this acquisition due to urgency except for consultation with the Scrutiny Chair in relation to urgency.

7.12 **Climate Impact**

7.12.1 The current site is a brownfield site, through the delivery of a regeneration scheme the site will be remediated and will no longer be a blight on the local environment. Redevelopment of the site will be guided by the council's new Construction & Maintenance Climate Strategy

7.13 **Community Impact**

7.13.1 The project has the opportunity to provide housing including affordable housing to support a well-known pressure locally.

8. **Background Papers**

8.1 [Decision - Acquisition of Former Bus Depot, St James Road, Northampton - West Northamptonshire Council \(moderngov.co.uk\)](#)

8.2 [Decision - Acquisition of Former Bus Depot, Northampton - West Northamptonshire Council \(moderngov.co.uk\)](#)

WEST NORTHAMPTONSHIRE COUNCIL
RECORD OF DECISION – Executive Decision

Date Of Decision:	27 October 2023
Title:	Acquisition of Former Bus Depot, Northampton
Is this a “Key Decision”?	Yes
Purpose:	<p>To acquire the former Bus Depot in Northampton for a regeneration scheme.</p> <p>The reason that this is not going to a meeting Cabinet is because the decision needs to be exercised urgently and therefore the urgency procedure as set out in the Constitution is being applied. The urgency is that the current owner of the site wishes to sell the site with immediate effect and there wouldn't be adequate time to take this decision through the normal decision making process and the Council's opportunity to purchase the land will be lost to other bidders. A report will be taken to Full Council on the 30th November 2023 to report the decision taken in accordance with the urgency procedures.</p>
Cabinet Member:	Cllr Dan Lister, Cabinet Member for Economic Development, Town Centre Regeneration & Growth
Decision Maker:	Cllr Adam Brown, Deputy Leader of the Council
Consultation and Scrutiny:	Cllr Andre Gonzalez de Savage - Chair of the Place Overview and Scrutiny Committee approved the decision be taken under urgency procedures via e-mail dated 27/10/2023.
Officer Recommendations:	<ul style="list-style-type: none"> • To recommend to the Non-Executive to establish a capital budget of £3.3m for the purchase of the former bus depot and buildings at St James, Northampton to include Stamp Duty Land Tax (SDLT). • To approve the acquisition of the Former Bus Depot in Northampton for the delivery of a regeneration scheme.
Decision Taken:	To proceed with the acquisition of the Former Bus Depot in Northampton for the delivery of a regeneration scheme.
Reasons For Decision:	<p>The recommendations are being made to:</p> <ol style="list-style-type: none"> a) enable the regeneration of a large brownfield site within West Northamptonshire b) support the regeneration and economic wellbeing of West Northamptonshire c) for the delivery of a housing scheme to address the needs of the local community <p>Without intervention, it is likely that the site would be sold to a developer who wishes to use the site for industrial and warehousing end use. This is likely to have an adverse effect on the surrounding area and contribute to the decline of the town centre.</p>

<p>Alternative Options Considered (Including Reasons For Rejection):</p>	<p>Alternative decision to not proceed with the acquisition would mean that the site would be likely sold to a developer who could land bank the site or could bring forward low-grade uses. Given the challenges of the site, it is also possible that the site could continue to sit vacant adding to the negative perception of the town centre and beyond.</p> <p>Full alternatives are set out in the Appendix to this decision</p>
<p>Declarations of interest:</p>	

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

Name: Cllr Adam Brown, Deputy Leader of the Council

Date: 27/10/2023

WEST NORTHAMPTONSHIRE COUNCIL
RECORD OF DECISION – Non Executive

Date Of Decision:	27/10/2023
Title:	Acquisition of Former Bus Depot, Northampton
Is this a “Key Decision”?	Yes
Purpose:	<p>To seek approval for the budget to be created for the acquisition of the Former Bus Depot site in Northampton.</p> <p>The reason that this is not going to a meeting Council is because the decision needs to be exercised urgently and therefore the urgency procedure as set out in the Constitution is being applied. The urgency is that the current owner of the site wishes to sell the site with immediate effect and there wouldn't be adequate time to take this decision through the normal decision making process and the Council's opportunity to purchase the land will be lost to other bidders. A report will be taken to Full Council on the 30th November 2023 to report the decision taken in accordance with the urgency procedures.</p>
Cabinet Member:	Cllr Dan Lister, Cabinet Member for Economic Development, Town Centre Regeneration & Growth
Decision Maker:	Cllr Adam Brown, Deputy Leader of the Council
Consultation and Scrutiny:	Cllr Andre Gonzalez de Savage - Chair of the Place Overview and Scrutiny Committee approved the decision be taken under urgency procedures via e-mail dated 27/10/2023.
Officer Recommendations:	To approve the creation of a capital budget of £3.300 million for the acquisition of the former bus depot site, St James further due diligence and design development.
Decision Taken:	To approve the creation of a capital budget of £3.300 million for the acquisition of the former bus depot site, St James further due diligence and design development.
Reasons For Decision:	<p>The recommendations are being made to:</p> <ul style="list-style-type: none"> a) enable the purchase of the former Bus Depot site in Northampton b) enable the regeneration of a large brownfield site within West Northamptonshire c) support the regeneration and economic wellbeing of West Northamptonshire d) for the delivery of a housing scheme to address the needs of the local community <p>Without intervention, it is likely that the site would be sold to a developer who wishes to use the site for industrial and warehousing end use. This is likely to have an adverse effect on the surrounding area and contribute to the decline of the town centre.</p>
Alternative Options Considered (Including Reasons For Rejection):	Alternative decision to not proceed with the acquisition would mean that the site would be likely sold to a developer who could land bank the site or could bring forward low-grade uses. Given the challenges of the site, it is also possible that

	the site could continue to sit vacant adding to the negative perception of the town centre and beyond. Full alternatives are set out tin the Appendix to this decision
Declarations of interest:	

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

Name: Adam Brown, Deputy Leader of the Council

Date: 27/10/2023

Record of Decision

Purchase of Land at St James' Road, Northampton

Appendix A

Background

- 1.1 The tram, later bus, depot on St James' Road, Northampton was developed by the Northampton Corporation, passed to Northampton Borough Council in 1974, and with the sale of the Northampton Bus Company passed into the ownership of Stagecoach. In 2014, it was acquired with the assistance Northampton Borough Council (which briefly held the ownership) by Church's Shoes for the purpose of extending Church's manufacturing capacity. The site has been vacant for over ten years and is contributing to the negative perception and environment for the town.
- 1.2 The site has an area of 1.83 ha (4.5 acres) and is significantly (0.71Ha, 1.8 acres) covered in buildings. Apart from the transport office at the front of the site and the original tram depot façade, these have limited character or value.
- 1.3 Church's did not develop the site as intended and decided to market it for sale.
- 1.4 Proposals for a range of uses have come forward on the site including for residential and commercial uses. The most likely commercial uses that have been proposed are for open storage and distribution uses. While in planning terms commercial uses are supported this is a vast departure from the use as an extension of the Church's factory, for which the land was originally sold.
- 1.5 Open storage and distribution uses present a risk to the local area detracting from the appearance creating issues around safety for the residential neighbourhoods and not meeting the wider needs of the council through supporting high quality employment spaces or residential needs
- 1.6 Through the Council's engagement with developers and our internal teams on the site, housing has been looked at as one of the potential uses identified as the preferred use on this site given that it has potential to meet housing needs on a strategic brownfield site, helping to ensure people had suitable places to live and minimising the need for the use of greenfield land for housebuilding. However, there appeared to be a material risk the land would end up being use for low-grade industrial or storage uses. Whilst these may be permissible in planning terms, they would not support the regeneration and place shaping of the area. In subsequent conversations with planning colleagues, they have informed us that the site may be identified as a residential site in the emerging West Northamptonshire Local Plan.
- 1.7 The Council submitted an offer of £3.000 million (m) for the site, which was subject to a decision by cabinet and full council. This has been accepted by Church's. If the

purchase concludes, the Council would also be likely to need to pay Stamp Duty Land Tax (SDLT) of £0.140m and would incur in the order of £0.010m in legal and other professional fees.

- 1.8 A further £0.150m will be required to undertake further due diligence, design development and professional fees related to the procurement of a development partner for the site. Therefore, a budget of £3.300m would be required. There is no existing budget suitable for this purpose.
- 1.9 The Council has received updated ground contamination reports (Hydrock Report Review and Recommendations May 2023) which was independently assessed to identify the costs to undertake the required interventions (Quantem Northampton Bus Depot Site Remediation & Clearance June 2023). The Council also received flood risk information from the landowner but as these dates back to 2015, the Council has commissioned an updated report and is waiting for the Environment Agency to respond.
- 1.10 There has been local interest in seeking to have the former bus depot building listed through Historic England (HE). HE has stringent criteria for buildings to become listed and there is a chance that any of the buildings on the Former Bus Depot will become site listed. However, the risk remains that an application is made by local groups for the site to be listed which would have a negative impact on the development opportunity of the site, costs and timescales. A second form of listing is through the Council's 'local listing'. The council reviewed this site as part of its draft local list and only the former ticket office on the corner of the site is considered significant enough to feature in the Council's draft local list.

Appraisal of Land Value

- 1.11 The Council appointed external consultants to undertake due diligence on the site and looked at the potential development capacity to assess the value. It is considered that this site is best suited for residential uses that would support the regeneration and place shaping of this area of Northampton. A number of potential scheme variations have been looked at including different mixes of housing typologies including levels of commercial floorspace within the site to optimise the outcomes.
- 1.12 The site has been vacant for over ten years and is contributing negatively to the overall appearance and environment of the town. The vision and aspiration for the site is to deliver a high-quality and flagship residential scheme providing economic, social and environmental benefits for the surrounding communities as well as contributing to the overall appearance of Northampton and West Northants as a whole. The intention is that quality would be achieved through strong design as well as including consideration of the overall sustainability of the development.
- 1.13 There is a risk that the site could go to a developer who wants the end use to be for distribution and warehousing. This is not what the Council considers to be an appropriate for this site given its location and the opportunity it has to positively contribute to the town. It is acknowledged that planning enforcement is a tool available



to the Council but there are concerns about its effectiveness in controlling development or use on site.

- 1.14 The appraisal work shows that the site could have a value between £1.5m and £2.0m depending on the specific mix of uses included within the scheme. These values take into account the estimated cost to remediate the site. If the Council was unable to deliver development on the site, the loss would thus be in the order of £1.8m (at the higher end). However, this loss should not be realised (see below) and should be considered only as 'worst case' risk outcome, if the Council was unable to develop the land.
- 1.15 Whilst of course savings would be sought, this scheme is not recommended as an invest to save project for the Council. Rather the purchase is recommended to ensure the positive regeneration impacts that this site would bring to the local communities.
- 1.16 The proposal would be for the Council to develop, or secure the development of, the land. The revenue impact of £3.3m capital expenditure taken on an annuity basis over 60 years (as is reasonable for a land purchase) would be £198k pa¹. Provided revenue savings or income generation at least equalled the financing costs no loss would be suffered.
- 1.17 Homes England has the benefit of a covenant on part of the site that gives it benefit of the uplift in value if the site was used for residential uses, there is a clawback provision to the benefit of Homes England who receive 100% of the value uplift for uses that are residential. There have been discussions with Homes England regarding the removal of this covenant or minimising the financial impact. Whilst Homes England has not confirmed agreement, it has been receptive and is open to discussions. If the removal of the covenant is not possible, the masterplan for the site could look at limiting residential use in order to ensure that the Council is not adversely impacted by the restriction.
- 1.18 The Council appointed Savills to undertake the appraisal work on the site. They found that the optimal mix to generate the highest land value for residential uses would be only retaining a small level of commercial within the former Transport Office building located on the South East corner whilst using the remainder of the site for residential uses, which would allow up to 79 houses.
- 1.19 Savills have also assumed that the clawback allowance can be removed via negotiation with Homes England. If this was achieved, it would give a value of the site of approximately £2m.

	Housing led – 79 houses
100% Open Market	£1,960,000
100% Affordable	£1,950,000

¹ Using 5.80% interest rate, the PWLB rate for fixed rate loans of 50 years for greater duration as of 29th September 2023.



- 1.20 This would mean that the Council would need to pay £1m more than the indicative land value for use as residential to regenerate the site. Savills note that if the land is able to be remediated using grant funding, then their opinion is that the site would then have a market value for residential development in the order of £3,000,000.
- 1.21 Savills also considered the employment/existing use value of the site. There may be scope for storage use in the existing building and the storage market is currently in high demand. This may push values further, to in the order of £2,000,000 - £2,500,000 as an investment with secure income.

Potential Benefits of the Scheme

- 1.22 The primary benefit of acquiring the site is to have full control over what development and uses can take place on the site in future.
- 1.23 The site sits on the boundary of Sixfields and Dallington & Spencer wards. There are areas of high deprivation surrounding the site with the Spencer and St James neighbourhoods. The former is the second most deprived and the latter the seventh most deprived within the whole of West Northamptonshire. Both are within the top 5% most deprived neighbourhoods nationally.
- 1.24 There is the potential to deliver a benchmark, exemplar scheme that sets a new standard in the local area within affordable and mixed housing tenures. The Council would seek to use the site to raise the standard in terms of design and sustainability. This will need to be tested as the scheme for the site is developed as there may be a trade-off between the quality that can be delivered, and the costs incurred.
- 1.25 Some of the largest pressures faced locally are those of affordable and suitable housing types for our residents. The current Council housing register waiting list is 4452 with a further circa 600 households currently in temporary accommodation.
- 1.26 The site has the potential to help ease these pressures and the majority of the housing within the scheme could be tenure types where the Council is facing most pressure. These would be affordable rent, social rent, shared ownership, or other affordable tenures.
- 1.27 The delivery of affordable housing on this site may contribute towards meeting housing need across West Northamptonshire and reducing the costs the Council incurs providing temporary accommodation.
- 1.28 Alongside this a small number of Council-owned temporary accommodation units could be provided on-site if appropriate. Both approaches would help reduce the use of expensive nightly-charged accommodation which the council currently uses to meet some of the need for temporary accommodation. Indicative current costs are outlined below:

Size	Net cost to Council	Net cost	Net cost per unit
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	(nightly)	(monthly)	(annual)
2 bedrooms	£33	£994	£11,929

- 1.29 To use the extreme case, if all 78 houses provided on the site allowed people to be moved out of temporary accommodation (not all to this site; cascade moves could achieve the same effect), the saving in temporary accommodation costs would be around £930k pa. Of course, the costs in achieving these savings would need to be taken into account. Current typical costs per unit delivered are £150k, allowing a rough estimate of costs of provision of £11.7m. This would represent an annual revenue impact (on the same bases as above) of £702k, and thus an annual savings of £227k. Taking the revenue effect of the land purchase costs into account would give an overall annual saving of £30k pa.
- 1.30 It is stressed that these figures are inevitably crude and uncertain at this stage, but nonetheless they give a sense of the likely scale of outcomes.
- 1.31 Some level of specialist housing provision may also be factored into the housing delivery on this site to offer more cost-effective and customer-focused housing solutions for adult social care and NCT (Northamptonshire Children s Trust) customers e.g., cluster homes for people with learning disabilities, or accommodation for care leavers.
- 1.32 This site may make a contribution towards the wider Council financial pressures and transformation of service delivery, in particular housing and adult social care and children’s placements. Currently West Northamptonshire is reflecting the situation nationally with increasing levels of homelessness and rough sleeping.
- 1.33 Through the delivery of 79 new homes on this site, taking the blended rate for Council Tax Band A & B properties would generate £120,678 per year for the Council. It is possible that some homes might be rated at a higher band and also through the design development process, density might be able to be increased on the site. Of course, the residents of these houses would also use services and thus generate costs for the Council.

Potential Gap Funding Opportunities

Home England

- 1.34 Homes England is keen to invest in West Northamptonshire and strategic discussions are currently taking place between the Council and Homes England over a number of sites which include the potential for this area to apply for funding through the Brownfield Infrastructure Fund (BIF). BIF is grant funding specifically aimed at unlocking brownfield sites such as the former bus depot.

Brownfield Land Release Fund



- 1.35 As well as the support from Homes England the Council also has a track record of securing significant sums from the Brownfield Land Release Fund to support the remediation of complex sites such as this, with the Council receiving £750,000 this year for the 35-45 Abington Street development and £400,000 last year for the delivery of a smaller residential scheme on New South Bridge Road. The next round of Brownfield Land Release Funding from OPE will be in January-March 2024.

Enterprise Zone

- 1.36 This site is also within the Waterside Enterprise Zone (EZ). There is potential that the EZ could contribute to the revenue costs associated with taking the site through design development and procurement as well as the possibility of providing capital funding to assist with land remediation and site assembly. Whilst the current arrangement for the EZ would be unlikely to enable this, governance arrangements around Enterprise Zones are currently changing with the policy from the Government to transfer economic development leadership from LEPs (Local Enterprise Partnerships) to councils. This may mean this becomes an opportunity for the Council to secure funding towards suitable development of the site.

Risks and Issues

- 1.37 Land purchases and regeneration schemes will always carry an inherent level of risk due to the unforeseen changes in circumstances; it is not possible to carry out land purchases and development without some level of risk. Key risks and issues are summarised below.
- 1.38 Flooding – the site falls within flood zones two and three (development difficult or impossible to justify) but is located within a defended area meaning this is possibly mitigated to flood zone one (development generally acceptable). There may be the need for further flood defences to minimise residual risk from surface water flooding.
- 1.39 Overage – there is a clawback provision to the benefit of Homes England who receive 100% of the value uplift for uses that are residential. The clawback is triggered by implementation of planning permission (for change of use or development of the property) or by disposal with planning permission.
- 1.40 Ground issues and contamination – the hydrocarbon contamination from historic use appears to have been mostly remediated, however there may be some residual issues. Prior to the construction of the tram/bus depot, the site was used as an ironworks; this may have left a range of materials and ground conditions. While some ground investigation for the site has been undertaken with the information provided to the council, there is still risk for elements that may have been missed or underestimated that may be more expensive than assumed, reducing net values or increasing the level of grant funding required.
- 1.41 Asbestos – asbestos containing materials have been identified across the site, this would need to be removed by a specialist contractor prior to demolition or



development. These costs are not yet fully understood and may be more than assumed, reducing net values or making the site unviable.

- 1.42 Demolition costs – in the absence of former tenders or other detailed assessment, the assumed demolition costs are uncertain, and may be higher. This would reduce the net value of the site or make the site unviable.
- 1.43 Planning (general) – the site falls within a safeguarded employment area within the local plan. The policy supports the change of use to alternative non-employment generating uses only if evidence can be provided to demonstrate that the existing use and other employment generating uses are not viable. Evidence to be supplied includes “details of active marketing undertaken over a continuous period of 12 months which shows that the site has been actively and extensively marketed for employment use and that no suitable interest has been expressed.” In subsequent conversations with planning colleagues, they have informed us that the site may be identified as a residential site in the emerging West Northamptonshire Local Plan. Paragraph 123 of the National Planning Policy Framework also supports a flexible approach to use of allocated site, in particular (a) to “use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres...”
- 1.44 Planning (conservation) – There is a risk that the site, or parts of it, could end up being locally listed or nationally listed. Whilst this would not be a significant issue for the Transport Office, as it is planned to retain this, any listing would cause significant issues on the rest of the site. Even if the site is not listed, the National Planning Policy Framework (NPPF) still requires consideration of the significance of non-listed heritage assets, which this is. This may mean some parts, or all of the existing structure need to be retained. This is likely to harm values (whether revenue or capital). There is a local campaign running to preserve the buildings and have them listed.
- 1.45 Other costs – there is currently a business rates liability on the site of c£60k a year. This would be reviewed to see whether the liability could be removed or reduced, and once preparation works start on site, this could also reduce the payment to the VOA (Valuation Office Agency). There are also costs associated with holding the site, such as security, these would be funded through the Enterprise Zone budget.

Finance

- 1.46 As set out above there are a number of financial and non-financial risks associated with the site some of which could lead to further financial liabilities.
- 1.47 However, as detailed earlier in the report, the maximum financial exposure currently assumed is £1.8m. This should be treated as the cost of being able to own, control and regenerate the site as the Council wishes. Without incurring this cost the Council would have no control over the site and is informed that it would likely to be used for logistics and storage which goes against what we are trying to achieve for this area of Northampton.



- 1.48 As set out above there is also a risk in respect of the Homes England (HE) clawback. The Council has had positive discussions where (HE) has indicated a willingness to forego all or part of its overage as well as to look at increased grant levels to work with the Council to deliver an exemplar scheme within Northampton. The position is not yet agreed, and it is of course possible that part or all of the restrictive covenants will be repayable. As a result, the position will need to be carefully monitored.
- 1.49 Having stated the above, there are several factors that should be considered that will reduce this overall regeneration premium and a number of them have been set out in the report. These include:
- Application for grant funding that has not been factored into the scheme.
 - Release of the clawback liability from Homes England which potentially would increase the value of the land.
 - Additional Council Tax receipts (received annually) to offset costs depending on site development.
 - Additional business rates receipts (received annually) depending on site development.
 - Combination of additional business rates and Council Tax receipts depending on site development.
 - Potential reduction in temporary accommodation costs across the Council.
- 1.50 It should also be considered that once this site has been regenerated there would be a boost to the local economy with more money spent with local businesses.
- 1.51 Homes England: The Council has engaged with Homes England and had positive discussions where it has indicated a willingness to forego all or part of its overage as well as to look at increased grant levels to work with the Council to deliver an exemplar scheme within Northampton. The position is not yet agreed, and it is of course possible that part or all of the restrictive covenants will be repayable.

Legal

- 1.52 Section 120 of the Local Government Act 1972 authorises the Council to purchase land by agreement:
- “For the purposes of:
 - a) any of their functions under this or any other enactment, or
 - b) the benefits, improvement or development of their area”
- 1.53 The general power of competence in the Localism Act 2011 provides the Council with the power to do anything that individuals generally may do subject to the restrictions and/or limitations which are specified in the Act.
- 1.54 In addition, section 111 of the Local Act 1972 provides the Council with the power to do anything (whether or not involving expenditure, borrowing, or lending of money or



the acquisition disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to the discharge of any of the Council's functions.

- 1.55 To eliminate the risk of challenge it is important to ensure that in reaching a decision in respect of the above proposal as outlined in full above, it is key that the Council should be able to demonstrate that as part of its decision-making process it considered to all relevant matters.

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