



# Cabinet

A meeting of the Cabinet will be held at the Council Chamber, The Forum, Moat Lane, Towcester, NN12 6AD on Tuesday 7 May 2024 at 6.00 pm

## Agenda

Public Session	
1.	<b>Apologies for Absence</b>
2.	<b>Declarations of Interest</b> 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.	<b>Minutes</b> (Pages 5 - 10) To confirm the minutes of the meeting of Cabinet held on 16 <sup>th</sup> April 2024.
4.	<b>Chair's Announcements</b> To receive communications from the Chair.
5.	<b>Urgent Business</b> The Chairman to advise whether they have agreed to any items of urgent business being admitted to the agenda.
6.	<b>Response to Scrutiny Review of E-Scooters</b> (Pages 11 - 16)
7.	<b>Northampton Town Centre Environmental Policy</b> (Pages 17 - 64)
8.	<b>Homelessness and Rough Sleeping Strategy 2024-27: Delivery Plan, Year 1</b> (Pages 65 - 120)

9.	<b>Commissioning of the Integrated Sexual and Reproductive Health services for West Northamptonshire</b> (Pages 121 - 132)
10.	<b>Options for Contracting Arrangements and Service Delivery model for 0-19 Health Visiting and School Nursing Services</b> (Pages 133 - 142)
11.	<b>Household Support Fund (HSF) 5 Proposal: Distribution of Funds and Recipients for HSF5</b> (Pages 143 - 154)
12.	<b>Proposed Changes to the Home to School Transport Policy</b> (Pages 155 - 212)
13.	<b>Procurement of a Contract for the Operation and Maintenance of Gayton Closed Landfill - Leachate Treatment Plant</b> (Pages 213 - 222)
14.	<b>Procurement and Implementation of WNC Education Services Case Management System</b> (Pages 223 - 230)
15.	<b>Northampton Markets Development Plan</b> (Pages 231 - 276)
16.	<b>Special Educational Needs &amp; Disabilities (SEND) and Alternative Provision (AP) Transformation Programme</b> (Pages 277 - 286) General Exception Rule Applied
<b>Private Session</b>	

Catherine Whitehead  
Proper Officer  
26 April 2024

**Cabinet Members:**

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

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### 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

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Or by writing to:

West Northamptonshire Council  
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 16 April 2024 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 Bob Purser  
Councillor Andre Gonzalez De Savage  
Councillor Andrew Grant  
Councillor Jonathan Harris  
Councillor Keith Holland-Delamere  
Councillor Rosie Humphreys  
Councillor Peter Matten  
Councillor Ken Pritchard  
Councillor Emma Roberts  
Councillor Wendy Randall

### **Officers:**

Anna Earnshaw, Chief Executive  
Rebecca Purnell, Assistant Chief Executive  
Martin Henry, Executive Director - Finance (Section 151 Officer)  
Catherine Whitehead, Director of Legal and Democratic (Monitoring Officer)  
Paul Hanson, Head of Democratic & Elections  
Sofia Neal-Gonzalez, Democratic Services Officer  
Jane Carr, Director of Communities & Opportunities  
Stuart Lackenby, Executive Director - People Services & Deputy Chief Executive  
Sarah Reed, Executive Director - Corporate Services  
Stuart Timmiss, Executive Director - Place, Economy and Environment  
Gillian Baldock, Political Assistant to the Conservative Group  
Josh West, Political Assistant to the Labour Group

141. **Apologies**

None received

142. **Declarations of Interest**

None

143. **Minutes**

The minutes from the Cabinet meeting of 12<sup>th</sup> March 2024 were approved and signed as a true and accurate record.

144. **Chair's Announcements**

None

145. **Urgent Business**

None

146. **Carer Strategy**

At the Chair's invitation Councillor Matt Golby and The Director of Public Health presented the report, copies of which had been previously circulated. Members were reminded that carers could be of any age. The strategy itself had been written with the help of carers known as experts by experience.

Councillors made the following comments.

- It was noted that nationally the value of unpaid workers was £162 billion.
- Most carers when asked simply needed to be supported.
- The co-production aspect of the report was praised.
- More information about how the strategy would be implemented was requested, a delivery plan was needed.
- How would young carers be identified, could schools and parish councils help with this?
- The price of respite places has increased.

Councillor Matt Golby agreed that a delivery plan was needed and advised that the strategy would be presented to Scrutiny for consideration.

The Executive Director of Adults, Communities and Wellbeing advised that the need to identify young carers had been discussed and officers were aware.

**RESOLVED: Cabinet approved the 30-day carer strategy consultation.**

147. **Proposed Drainage Byelaws for Flood Risk Management**

At the Chair's invitation Councillor Phil Larratt presented the report, copies of which had been previously circulated. He advised Cabinet that flooding was a serious issue and it was important for the council to do everything it could to help residents recover from it. WNC is the land drainage and flood authority, which means it can create byelaws. Members were advised that Full Council would decide whether to apply the byelaws.

Councillors made the following comments.

- Would the new byelaws be enforced properly?
- It was important to keep the biodiversity of areas in mind when looking for flooding solutions.
- Failure to maintain the waterways has an adverse effect on those living further down the valley.
- If the public are expected to report issues, would there be signage in place to provide them with the relevant information.
- How would the byelaws deal with drainage infrastructure?
- When would the new Flood Team be fully functioning?

Councillor Phil Larratt made the following comments.

- The byelaws would be enforced.
- There had been difficulty recruiting to the Flood Team due to the specialist skills required, there were currently two outstanding positions

**RESOLVED: Cabinet approved the principle of making the land drainage byelaws as set out in Appendix A.**

148. **Consultation draft Parks Development Strategy**

At the Chair's invitation Councillor Phil Larratt presented the report, copies of which had been previously circulated. It was noted that the parks within WNC were great assets, but many had limited provision. There were various outdoor learning opportunities within the parks which were a credit.

Sally Keeble made the following comments.

- Swan Haven was a great example of an urban park that tackled disadvantage and provides access for pushchairs, bikes, and wheelchairs.
- The park also dealt with the effects of climate change with a surface water drainage system, which had only been referenced twice in the report.
- Although an urban park, the lakes and stream had always been there.
- Reed beds had been installed but not managed properly, it would take capital to correct this.
- The delivery dates for proposed works needed to be brought forward as areas had already deteriorated badly.

Councillors made the following comments.

- Were parish councils aware of the proposed consultation?
- New signage would be a positive change.
- There was a need for adult play/exercise equipment.
- Local interest groups should be involved.
- Northants boasts a rich cultural heritage, it was important to capitalise on that.
- The timescales were a concern, some issues need tackling as soon as possible.
- It was suggested the strategy had no sense of community inclusion.
- It was noted that there had been no alignments made to other areas, such as Public Health.
- The University of Northampton had spoken to 60 individuals about the benefits of parks and outdoor spaces, this had not been mentioned in the report.

Councillor Matt Golby agreed that green open spaces were important for a person's health.

Councillor Adam Brown noted that the toilet block facilities in Abington Park had been approved. The lack of progression needed to be looked at.

Councillor Phil Larratt made the following comments.

- The goal would be for all parks to be green flag parks.
- All ideas would feed into the consultation, and if needed timescales could be looked at.
- Councillors were advised that the document was a first draft and that Parish councils would be informed.

**RESOLVED: Cabinet approved the draft Parks Development Strategy for public consultation.**

#### 149. **Director of Public Health Report 2023**

At the Chair's invitation Councillor Matt Golby and the Director of Public Health presented the report, copies of which had been previously circulated.

The Director of Public Health advised that the report was an independent and produced every year. The report cuts across all portfolios and the case studies included were very informative. The route map found within the report was mentioned, this flagged differences between life expectancy and healthy life expectancy within difference areas of Northants. More work was needed to be done in order to better understand the inequalities.

Councillor Matt Golby noted the amount of good work that was going on within Public Health.

Councillors made the following comments.

- The Health Inequalities and figures found in the report were a concern. With stark differences between affluent and less affluent areas.

- There had been an increase in the number of fatalities and serious injuries occurring on the county's roads.
- How was the Council encouraging residents to move more? It was questioned whether more cycle paths could help with this?
- The work of LAPS needed to be better understood.
- Did the council have any information regarding the quality of life for young people. The percentage of children living in low-income homes had increased by 42%.
- Members were advised that for the first time, according to the CEO of the Citizens Advice Bureau, 60- to 80-year-olds were voicing concern about the lack of food or money.

The Director of Public Health agreed that the difference in life expectancy was shocking, and that the council needed to look at how it could help, it was however not a quick fix. The cost-of-living situation had increased the struggle of some families and the Council was trying to target those families.

Councillor Matt Golby advised Public Health were aware of what the issues were and had been working through them.

Councillor Adam Brown paid tribute to the Director of Public Health and her team for all the work undertaken.

**RESOLVED: Cabinet;**

- 1. Noted the contents of the report and recommendations made.**
- 2. And the Board noted the progress made with regard to the recommendations in the previous annual report.**

The meeting closed at 7.40 pm

Chair: \_\_\_\_\_

Date: \_\_\_\_\_

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# WEST NORTHAMPTONSHIRE COUNCIL

## CABINET

7<sup>th</sup> May 2024

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

<b>Report Title</b>	<b>Response to Scrutiny Review of E-Scooters</b>
<b>Report Author</b>	<b>Nick Henstock, Assistant Director Highways and Transport</b>

### List of Approvers

<b>Monitoring Officer</b>	Catherine Whitehead	16/04/2024
<b>Chief Finance Officer (S.151)</b>	Martin Henry	16/04/2024
<b>Other Director</b>	Stuart Timmiss	16/04/2024
<b>Communications Lead/Head of Communications</b>	Becky Hutson	16/04/2024

### List of Appendices

None

#### **1. Purpose of Report**

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- 1.1. This report presents further detail regarding the proposals made in the Place Overview and Scrutiny committee report presented at Cabinet in March 2024 and update for Cabinet on the progress that has already been made in relation to the proposals.

#### **2. Executive Summary**

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- 2.1 Place Overview and Scrutiny Committee presented a report to Cabinet in March 2024 outlining proposals to address issue that were identified during their task and finish group activity that reviewed the operation of the E-Scooter trial being conducted in West Northamptonshire. The

report also recommended that the E-Scooter trial should continue, subject to the issues being addressed.

- 2.2 Work has already begun to implement these recommendations in line with the responses included in the March 2024 Cabinet report.
- 2.3 West Northamptonshire have confirmed to the DfT the intention to continue with the E-Scooter trial, subject to Cabinet endorsing this report and agreeing an extension to the current contract with Voi.

### **3. Recommendations**

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- 3.1 It is recommended that the Cabinet/Committee:
  - a) Endorse the continuation of the E-Scooter trial
  - b) Note the further detail regarding the proposals made in the Place Overview and Scrutiny committee report presented at Cabinet in March 2024.
  - c) Note the update on the progress made in relation to these proposals.

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

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- 4.1 The recommendations are required in order to ensure the Cabinet properly responds to the review of the E-scooter trial carried out by the Place Overview and Scrutiny Committee. The recommendation to endorse the continuation of the e-scooter trial aligns with the recommendations made by the committee and further detail on specific recommendations is set out elsewhere within this report.

### **5. Report Background**

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- 5.1 A motion was proposed at the meeting of full Council held on 28 September 2023 regarding issues experienced by residents resulting from the E-Scooter trial in West Northamptonshire. By a majority vote, full Council agreed to refer the motion to the Place Overview and Scrutiny Committee for their consideration.
- 5.2 Place Overview and Scrutiny Committee convened a task and finish group to consider the effectiveness of the VOI E-Scooter Trial in West Northamptonshire. The task and finish group considered a significant amount of evidence over a six-week period, including the results of a public survey which received 2663 responses.
- 5.3 Place Overview and Scrutiny Committee presented a comprehensive report to Cabinet in March including the following recommendations:

**Recommendation 1:**

That the trial of the VOI E-Scooter is continued to May 2026 but there is a need for improvements and a Road Map for development of the improvements should be a condition of any contract extension offered.

The Road Map should address:



- 1 Review the current scheme to seek improvements and changes in respect of Geo-fence areas where:
  - Speed controls and restricted zones to be reviewed and extended ;
  - E-Scooters cannot be parked on an individual basis in specific key locations (i.e., Disabled access and emergency access points).
- 2 That parking is reviewed to improve end location via use of improved technology (AI) and infrastructure (parking frames) are implemented where appropriate.
- 3 That new and emerging technology is assessed, and timescale set for the implementation in regard:
  - Eliminating twin riding.
  - Preventing E-Scooters from riding pavements.
- 4 That E-Scooter safety is reviewed improving visibility at night, ensuring registration numbers are more visible and that campaigns and messaging to existing riders are increased and more regular in regard to best practice and also to include the wearing of helmets.
- 5 That a review of the complaints' procedure is undertaken with the aim of improving the process of tracking complaints via a reference number with timely action and communication.

**Recommendation 2:**

That a new governance and project management process is set up to include West Northants Council, VOI and Northamptonshire Police. That the terms of reference for this group include the management and monitoring of progress of items included in the Road Map.

**Recommendation 3:**

That Officers produce a suite of KPI's for Cabinet to review which will provide transparency in relation to the numbers of complaints, actions taken and enforcement

**Recommendation 4:**

That Cabinet considers setting up a regular all Member Quarterly forum that will provide context and challenge for improvement and improved communications

**Recommendation 5:**

That Cabinet reviews enforcement to ensure all resources available to the Council, Police and VOI are aligned and efficient and that any enforcement actions can be aligned and the results fully communicated and released.

**Recommendation 6:**

That Officers investigate best practice from other areas and where applicable implemented to include a review of future policies and infrastructure identified as part of the local plan process once subject to government approval.

**Recommendation 7:**

That Cabinet has oversight and puts in place monitoring (period in review) of the Trial.

**Recommendation 8:**

That Cabinet is requested to provide a report to Place Overview and Scrutiny Committee at the conclusion of the E-Scooter Trial that identifies progress and issues for discussion.

- 5.4 In response to these recommendations, officers have been working with Voi and the contract management team to put in place measures that relate to these recommendations.
- 5.5 **Recommendation 1:** DfT have been informed our WNC's intention to continue with the E-Scooter trial and work to implement improvements has begun.
- 5.6 A review of Geofenced areas has taken place and agreement has been reached to introduce new speed controls and restricted zones.
- 5.7 Parking reviews have commenced and already the outputs of this include a no parking zone in the Drapery and new parking zones created on Bradshaw Street and Mercers Row. Realtime photo validation of E-Scooter parking has been extended across the whole of Northampton – previously this was limited to the town centre.
- 5.8 Voi have committed to continuing development of technologies to eliminate twin riding and pavement riding, however it is not currently possible to place a timeframe on this.
- 5.9 Voi have reviewed the visibility of their fleet at night and will be rolling out an amended livery with additional reflective areas on their E-Scooters in May and June.
- 5.10 The contract management team are working with Voi to agree the contract extension which is required from the end of May in order to allow Voi to continue operating in West Northamptonshire. The contract management team will monitor the performance of the trial over the extension period. The contract will continue to include a termination clause that allows the contract to be terminated with 2 months notice.
- 5.11 A review of the complaints procedure will be taking place over the coming summer and the outcome will be communicated so that residents are aware of the most appropriate methods for them to raise issues with Voi.
- 5.12 **Recommendation 2:** New governance has been implemented, WNC's Transport and Strategy Development Manager meets with Voi monthly along with the contract management team and the police. Additionally quarterly meeting have been diarised with Voi, the Assistant Director for Highways and Transport and the police.
- 5.13 **Recommendation 3:** KPIs relating to the contract will be reviewed at the quarterly governance meetings.
- 5.14 **Recommendation 4:** Six monthly meetings with members have been diarised.
- 5.15 **Recommendations 5 & 7:** Cabinet will receive an annual report regarding the operation of the trial and progress of the items included in the roadmap.

- 5.16 **Recommendation 6:** Officers continue to seek out best practice in all respects and any future policies will be based on this best practice. The Local Transport Plan development will include consideration of infrastructure to support the use of E-Scooters which could be implemented once there is an understanding of the legislation that will govern their usage.
- 5.17 **Recommendation 8:** At the conclusion of the trial period a report will be presented to Cabinet that will consider the trial's success. Place Overview and Scrutiny will have the opportunity to scrutinise the report at this time.

## **6. Implications (including financial implications)**

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### **6.1 Resources and Financial**

- 6.1.1 The extension of the E-Scooter trial has implications only with regards to the officer time associated with the management and governance of the contract with Voi.

### **6.2 Legal**

- 6.2.1 There are no specific legal implications arising from this report.

### **6.3 Risk**

- 6.3.1 There are no significant risks arising from this report.

### **6.4 Consultation and Communications**

- 6.4.1 The Place Overview and Scrutiny Committee carried out consultation, no further consultation has taken place.
- 6.4.2 West Northamptonshire Council is working with Voi, Northants Police and North Northamptonshire Council to adopt a proactive communications strategy which shares essential safety messaging across online and offline platforms. The organisations will continue to work in partnership to promote responsible riding and inform the public of the use of e-scooters.

### **6.5 Consideration by Overview and Scrutiny**

- 6.5.1 This report is responding to the Place Overview and Scrutiny committee report presented at Cabinet in March 2024.

### **6.6 Climate Impact**

- 6.6.1 The extension of the E-Scooter trial will allow for the continued benefits that have been gained as a result of E-Scooter usage in West Northamptonshire. Current data shows a net benefit from the scheme with further analysis to take place.

### **6.7 Community Impact**

6.7.1 VOI E-Scooters are available for all those over the age of 18 to hire within West Northamptonshire

## **7. Background Papers**

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7.1 None.



# WEST NORTHAMPTONSHIRE COUNCIL

## CABINET

09 May 2024

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

**Cabinet Member for Community Safety, Engagement and Regulatory Services: Councillor David Smith**

<b>Report Title</b>	<b>Northampton Town Centre Environmental Policy</b>
<b>Report Author</b>	<b>Fiona Unett, Assistant Director for Waste Fiona.unett@westnorthants.gov.uk</b>

### List of Approvers

<b>Monitoring Officer</b>	Catherine Whitehead	10/04/2024
<b>Chief Finance Officer (S.151)</b>	Martin Henry	10/04/2024
<b>Other Director</b>	Stuart Timmiss	27/03/2024
<b>Communications Lead/Head of Communications</b>	Becky Hutson	10/04/2024

### List of Appendices

**Appendix A – Northampton Town Centre Environmental Policy (Draft)**  
**Appendix B – Map of Town Centre and Defined Policy Area**  
**Appendix C – Consultation Analysis Report**

#### 1. Purpose of Report

- 1.1. The purpose of the report is to secure approval of the new Northampton Town Centre Environmental Policy and delegated authority to conduct a 12-month review of the policy, including making any necessary adjustments required.

## **2. Executive Summary**

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- 2.1 The Council is investing in the redevelopment of Northampton Town Centre with the objective of making it an attractive destination of choice for residents and visitors to shop, eat, and spend their leisure time.
- 2.2 In some parts of the town centre, bins and rubbish detract from the visual amenity and cause a nuisance. Therefore, a draft Northampton Town Centre Environmental Policy for West Northamptonshire Council has been developed (Appendix A), which sets out the guidelines for how waste (from businesses and households) should be managed in the town centre, with the objective of helping to keep the area of Northampton Town Centre clean and tidy.
- 2.3 The Policy explains how the Council plan to control how and when waste should be set out for collection through the introduction of timed waste collections in a defined policy area as shown on the map (Appendix B).
- 2.4 The Council will support businesses who may need to make changes to their waste collection arrangements by providing advice. After an initial education phase, it is proposed that the Council takes enforcement action, where appropriate to ensure that the policy is effective.
- 2.5 The Council is also working with its household waste collection contractor to ensure that waste collections from residential properties within the defined policy area are also within the 'waste collection window.'
- 2.6 A review of the policy is proposed after 12 months to ensure the expected outcome of the policy has been achieved and consider if there should be any adjustments or extension of the policy. The intended outcome is that it will reduce waste issues within the town centre, which will benefit residents, visitors and business and maximise the positive impact of the redevelopment works.

## **3 Recommendations**

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- 3.1 It is recommended that the Cabinet:
  - a) Approve the new Policy for adoption by West Northamptonshire Council
  - b) Endorse the proposed communications campaign to promote the introduction of the policy
  - c) Agree delegated authority to Executive Director of Place, Economy, and Environment, in consultation with the Portfolio Holder for Community Safety, Engagement and Regulatory Services to:
    - (i) make amendments to the policy as required, and
    - (ii) extend the area(s) covered by the policy where this would be beneficial.

## 4 Reason for Recommendations

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- 4.1 The proposed policy will allow the Council to exercise appropriate control over the presentation of waste in the centre of Northampton. This aligns clearly with the Live Your Best Life Ambition of a cleaner and greener environment.
- 4.2 The proposed policy will increase the positive impact of the investment and regeneration works in the work centre, improving the town centre environment for the benefit of residents, visitors, and businesses.
- 4.3 The proposed policy will require enforcement for it to be effective. Therefore, funding is required to enable additional warden resources for an initial 12-month period, prior to enforcement either becoming part of business as usual, or being incorporated in the new Environment Enforcement contract.
- 4.4 The policy is in line with the Council's Enforcement Policy and the Council's Littering and Fly-tipping Charters.

## 5 Report Background

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- 5.1 Improving the Council's local street scene is a key priority, and commercial waste receptacles stored permanently on the public highway (which includes footpaths), or household waste left for collection are not conducive to meeting this aim. This is a frequent problem, particularly in the central area of Northampton Town Centre, which has persisted for some time. If allowed to continue, waste collections in the town centre will detract from the regeneration investment in the Town Centre.
- 5.2 Waste which is not securely stored can spill onto the public highway and render an area unsafe by bins potentially causing obstruction to the public highway and providing an easy target for antisocial behaviour.
- 5.3 All organisations have a responsibility for ensuring that any waste arising from their activities is handled, stored, and disposed of in a responsible manner as defined by the Environmental Protection Act 1990 (section 34) and the Waste (England and Wales) Regulations 2011.
- 5.4 As part of 'Simpler Recycling' DEFRA has included a requirement for all businesses to plan with their waste collection provider for all recyclable waste to be collected separately from 2025. This has the potential to increase the number of waste containers used by businesses.
- 5.5 Officers have considered a variety of options to address these issues and looked at best practice elsewhere. Since commercial waste collections are not within the direct control of the authority, developing guidance and adopting it as a policy which will apply to waste from businesses and household is proposed as the preferred solution.
- 5.6 Several authorities within England and Scotland have developed similar policies which have significantly reduced the issues caused by waste and waste containers left on the highway. Typically, the policies introduce timed collections of commercial and residential waste in

areas within their town centres. Each of these authorities has broadly followed the requirements of the Environmental Protection Act 1990 which places a “duty of care” upon anyone who produces waste, and the Highways Act 1980 prohibits “wilful obstruction of the highway”.

- 5.7 To inform the development of the draft policy, initial meetings were held with the Northampton Town Centre BID, Northampton Town Council, and the Northampton Forward Board. An eleven-week public consultation was conducted between 30 November and 18 February and personal visits to more than 400 town centre businesses have been completed. The main commercial waste collection operators in the Town Centre have also been made aware of the proposed policy.
- 5.8 Feedback has broadly been supportive. Detailed feedback gathered as part of the public consultation is given in Appendix C. From the face-to-face visits with more than 400 businesses, only 40 identified that there may be a potential issue because they do not have on-site storage on their premises. The Council will provide advice to these business, including how their waste collections could be adjusted and whether there is any opportunity to share facilities that other businesses or property owners may have within the Town Centre.
- 5.9 Waste arising from market traders will also be within scope of the proposed policy. The Council is investing in the redevelopment of Northampton’s market square and a new strategy for managing the market will also include a requirement for stall holders to manage their waste responsibly and within the footprint of their stall.
- 5.10 In summary, the draft policy includes the following measures:
- Waste collection ‘windows’ during which waste can be set out for collection and collected by the appropriate organisation, as per the times below:  
Morning – between 06:00 – 09:00  
Afternoon – between 16:00 – 18:00  
These will align with any new Traffic Regulation Orders introduced in the Town Centre following development works.
  - At all other times waste will be expected to be stored within the business or residential premises.
  - If waste is presented outside of these windows, then enforcement action may be taken under section 47 of the Environmental Protection Act 1990 and the Anti-social Behaviour, Crime and Policing Act 2014 and other legislation as may be appropriate in the circumstances. Failure to comply with a section 47 Notice can result in prosecution, or in the issuing of a £100 fixed penalty notice (FPN), payable within 14 days. Failure to pay the FPN will result in the offender being prosecuted
  - Business should use suitable lockable containers for their waste and these containers should be labelled with the business name and contact details. Any bags need to be identifiable from which business they originated.
- 5.11 The proposed implementation timescales for the policy are:
- Agree policy at Cabinet meeting – May 2024
  - Further engagement and education – June, July, August 2024



- Enforcement from September 2024
- 12 Month Review – Summer 2025

## **6 Issues and Choices**

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6.1 The main options are:

- (i) To do nothing and let the current situation continue, which is likely to detract from the investment in the town centre and continue to cause a nuisance in terms of visual amenity, attract additional litter and fly tipping and obstructions on the highway.
- (ii) For the Council to provide waste collection services for all business and household properties in the Town Centre. Commercial organisations can select their preferred waste collection service provider, and they may do this based on several factors, including price, convenience and whether their waste contract is through their head office. Therefore, this was not considered to be a viable solution, because it was unlikely to result in all businesses using the Council's services.
- (iii) To provide designated storage areas for waste within the town centre. If implemented, there is a risk that this option may exacerbate the waste issues, because the designated areas will in effect become 'dumping zones' and may attract additional waste. Advice from other authorities who have introduced policies was that this would not be a recommended solution.
- (iv) To implement the policy as proposed. Note that in developing and consulting on the policy a few options were proposed, including the acceptable times to set out waste, the location(s) the policy should be focused on, and other control measures related to the containers used for waste.

6.2 An Equalities Screening Assessment has been completed and this has concluded that there is likely to be an overall positive impact because of this policy. No further actions are required.

## **7 Implications (including financial implications)**

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### **Resources and Financial**

7.1 To enforce the policy, it is proposed that additional wardens are secured for the Regulatory Services Team who would be specifically allocated to the Town Centre area to implement this policy. These wardens would be required for an initial 12-month period, to enable the Council to engage with businesses and provide support and advice prior to moving to the enforcement phase. After the initial 12-month review, enforcement could either be managed by the neighbourhood warden team as part of 'business as usual' or enforcement could pass to the new Environment Enforcement contract which is currently in procurement.

7.2 Officers have considered funding options for the additional two wardens required and have identified funding from existing resources. Recruitment of additional wardens will commence immediately to enable sufficient resource for the engagement and education phase and existing wardens will be used until additional wardens are in post.

## **Legal**

7.3 Section 47 of the Environmental Protection Act 1990 permits waste collection authorities, such as West Northamptonshire Council, to serve a notice on any occupier of premises in their area requiring them to store commercial or industrial waste in receptacles of a kind and number specified in that notice, both of which have to be reasonable, if they believe that such waste is likely to cause a nuisance or be detrimental to the amenities of the locality if not stored in such a way.

A section 47 notice may also impose requirements as to the receptacles relating to;

- Their size, construction, and maintenance,
- The material that may or may not be stored in them and presented for collection,
- Where and when they shall be presented for collection, for the purpose of avoiding nuisance and detriment to the amenities of the area,
- When they should be removed after waste has been collected and
- Where they shall and shall not be stored when not presented for collection.

7.4 Non-compliance with a section 47 notice is a criminal offence and punishable by a maximum £1000 fine a Magistrates' Court. It is also an offence in respect of which a £100 fixed penalty notice can be offered by a waste collection authority as an alternative to prosecution.

7.5 Section 46 notices can be issued for household waste, which is a civil offence.

7.6 Draft notices and the process for serving them will be agreed in advance with the Council's legal team.

## **Risk**

7.8 There key risk of some negative publicity related to the implementation of this proposal, for example criticism by local businesses whose waste costs may increase because of changed waste collection arrangements. However, as mitigation of this risk:

- The purpose of the policy is to increase the town centre amenity and help enhance the town centre as a destination for residents and visitors to visit, therefore businesses should also benefit from this policy.
- There was widespread support from respondents to the consultation.
- The BID, the Northampton Forward Board and the Town Council have been consulted early in this process to ensure they were supportive of the proposed policy.
- There will be an initial period of education and engagement with businesses to ensure that any new contracts they engage in are compliant with the policy.
- Businesses who do not have a waste storage area within their premises will be offered advice.

7.9 There is a risk that the recruitment of additional wardens may take longer than the proposed timescales to commence further education and education with businesses. If additional wardens are not in post, then this work can continue as part of the existing warden's work. However, this means that the implementation timescales may be extended.

7.10 If the policy is not implemented, there is a risk that the Council, businesses, residents, and visitors will not benefit from the investment in the town centre.

### **Consultation and Communications**

7.11 Officers met with the Northampton Town BID, Northampton Town Council and Northampton Forward Board early in the process to seek their views about potential solutions.

7.12 An eleven-week public consultation has been completed, which was well publicised on the Council's communication channels. Over 100 responses were received, which were broadly supportive (Appendix C).

7.13 Face to face engagement with more than 400 businesses has been conducted by Council officers who explained the proposed policy and asked businesses whether they had any concerns. Of these 400 businesses, 40 were identified who may not have a waste storage area on their premises and they will be offered further advice.

7.14 If the proposed policy is adopted by Cabinet, the communications team will draft and implement an extensive communications plan. This is to ensure that the policy and its objectives are communicated with residents and businesses across online and offline channels, including the Council's corporate communications channels. This information will be shared with key stakeholders to publicise to ensure that this reaches a wide audience.

### **Consideration by Overview and Scrutiny**

7.15 As this policy sits outside of the Budget and Policy Framework the Place Scrutiny committee has not been specifically consulted as part of this proposal. However, they have been made aware of the plan to introduce this policy.

### **Climate Impact**

7.16 These proposals contribute to the Authority's wider climate goals.

### **Community Impact**

7.17 The overall community impact is expected and intended to be positive, because of implementing this policy. Although there is a risk that some town centre businesses may be negatively impacted if their waste collection costs increase, they should see a positive impact from improved footfall resulting from the improvements to the Town Centre.





Northampton Town Centre

Environmental Policy



## Appendix A - Northampton Town Centre Environmental Policy (Draft)

### Document Version Control

Author: Ruth Austen AD Regulatory Services

Type of document: Policy

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### Change History

Issue	Date	Comments
0.1	12/01/24	First Draft
0.2	05/03/24	Second Draft incorporating group comments

### Consultees

Internal	External
Regeneration	Northampton BID
Transport and Highways	Northampton Town Council
ELT	Northampton Forward Board

### Distribution List

Internal	External
Ruth Austen	Assistant Director for Regulatory Services
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### Links to other documents

Document	Link
Resources and Waste Strategy	

## Appendix A - Northampton Town Centre Environmental Policy (Draft)

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3.0 Policy outcomes	3
4.0 The Policy	4
5.0 Timescales & Implementation	6

## Appendix A - Northampton Town Centre Environmental Policy (Draft)

### 1.0 Introduction

- 1.1 The Northampton Town Centre Environmental Policy (the Policy) sets out the guidelines for how waste collections will be managed within the Northampton Town Centre area, with the objective of improving the Town Centre for all residents, shoppers, and visitors by helping to keep the area clean and tidy.
- 1.2 The Policy introduces specific times for the presentation of waste from households and businesses in a defined area (appendix A) which is referred to in the rest of this document as ‘the Town Centre.’

### 2.0 Scope

- 2.1 The Policy includes guidelines for the presentation of waste for collection including waste from businesses and households.
- 2.2 The Policy will apply to all properties (businesses and households) in a defined area within Northampton Town Centre (Appendix A).
- 2.3 Commercial waste is any waste produced by a business on its premises. It is the business’s responsibility to appropriately store and arrange for the disposal of its commercial waste. The Policy includes requirements where a business should store its waste on appropriate receptacles.
- 2.4 Household waste is waste produced by a residential property and may include general rubbish and separate recycling and food collections. It does not include waste that has been created by landlords from properties that are leased to tenants, waste from tradespeople who have completed work in a residential property or in relation to any other commercial activities. The Council collects household waste in the Town Centre on a regular basis [Bins, recycling and waste | West Northamptonshire Council \(westnorthants.gov.uk\)](https://www.westnorthants.gov.uk) and collections in the town centre will be aligned to comply with this policy.
- 2.5 The Policy also applies in the following circumstances:
  - Where bins are used for mixed residential and commercial premises which have a domestic living accommodation within the commercial premises;
  - or by multi-occupied domestic accommodation such as flats and apartments which require shared commercial size receptacles provided by a property or managing agent.



## Appendix A - Northampton Town Centre Environmental Policy (Draft)

### 3.0 Policy Outcomes

- 3.1 Improving the Council's local area or 'street scene' is a key priority.
- 3.2 Waste receptacles stored permanently on the public highway are not helpful because:
  - they make an area look untidy and cause an obstruction on the highway;
  - they potentially breach businesses Duty of Care in respect of waste which is not securely stored and could spill onto the public highway;
  - potentially breach businesses Duty of Care in respect of waste which is not securely stored and could spill onto the public highway; and
  - they provide an easy target for antisocial behaviour.
- 3.3 More generally, waste receptacles stored on the street encourage a feeling of lack of care for the community, exacerbating the fear or perception of crime, undermining local investment regeneration, and adversely affecting the Council's aspirations.
- 3.4 The key objective of this policy is to improve the Town Centre for all residents, shoppers, and visitors by helping to keep the area clean and tidy because of removing waste receptacles from pavements and highways.
- 3.5 This policy therefore aims to:
  - Ensure that waste receptacles are stored on business or residential premises all times except for the specified permitted waste collection times
  - Introduce permitted waste collection times in a defined Town Centre area
  - Ensure clear pedestrian passage along pavements/footways
  - Seek an improvement in the aesthetics of the local area
  - Make provision for working with businesses within an agreed framework in the cases where an alternative location may not be available
- 3.6 Officers will offer help and advice to businesses on how to manage their waste arrangements and to prevent businesses falling foul of the law.
- 3.7 The Policy supports the Council's Resources and Waste Strategy by introducing measures in the Town Centre that will help improve street cleansing.

## Appendix A - Northampton Town Centre Environmental Policy (Draft)

### 4.0 Northampton Town Centre Environmental Policy

#### Requirements of the Policy

- 4.1 Businesses are expected to store all recycling and waste receptacles securely off the public highway. Where receptacles cannot be collected from the storage point receptacles may only be presented on the public highway within the timeslots set out below and once emptied must be returned to their storage point.
- 4.2 All waste containers must be lockable and be labelled with the name of the business. Waste bags need to be identifiable from which business the waste originated.
- 4.3 Businesses producing commercial waste shall provide safe and secure storage points and collection points within their originating premises for any clinical trade waste or hazardous trade waste. Such points shall be always kept secure with no access for the public.
- 4.4 Businesses must demonstrate that separate, suitable, storage provision is in place to appropriately dispose or recycle items that could cause hazards. An example of this of this is cooking oil.
- 4.5 The policy is not designed to prevent businesses from recycling opportunities and the authority expects all businesses to manage its waste in accordance with the legislation, separating waste for recycling and separate treatment where it is required to do so.
- 4.6 Where businesses do not have an alternative storage point, the Council will provide advice on options with the objective of finding a solution that is compliant with the policy. The onus is on the business to find a suitable storage location or make alternative refuse collection arrangements such as a more frequent bag collection.
- 4.7 Household waste collected from within the Town Centre will also be required to be presented in accordance with the requirements of the Policy.

#### Timed Collections Slots

- 4.8 The timed waste collection scheme provides two time slots every day when waste is permitted to be left out on the pavement, collected by a waste management organisation and the receptacles returned to their point of storage (i.e. removed from the street):

Morning (time)	6am-9am
Afternoon (time)	4pm-6pm
- 4.9 At all other times, the expectation is that the Town Centre area will be free of business and household waste receptacles, unless were agreed otherwise formally and in writing with the Council. Failure to do so may result in enforcement action against the business responsible for the waste.

## Appendix A - Northampton Town Centre Environmental Policy (Draft)

4.10 No waste is to be presented onto the highway (which includes footpaths) outside of the timeslots. Businesses will need to arrange with their waste collector and agree a time to present waste onto the highway for collection that abides by the time restrictions in force. Businesses must remove their uncollected waste from the highway and contact their waste collection provider regarding the missed collection and re-present during the times allowed.

### Legislation related to the Policy

4.11 The legislation underpinning this Policy includes (note the list below is not exhaustive):

- Environmental Protection Act 1990
- Highways Act 1980 - Any individual or business found wilfully obstructing the public highway can be served with a Notice under this Act. Wilful obstruction of the highway can lead to seizure of the obstructing item(s) and prosecution
- Local Government Act 2000
- Waste (England and Wales) Regulations SI 2011/988
- Controlled Waste Regulations SI 1992/588.
- Hazardous Waste (England and Wales) (Amendment) Regulations 2009
- Anti-social behaviour crime and policing Act 2014

4.12 All organisations have a responsibility for ensuring that any waste arising from their activities is handled, stored, and disposed of in a responsible manner as defined by the Environmental Protection Act 1990 (section 34) and the Environmental Protection (Duty of Care) Regulations 1991, as amended 2003.

4.13 The Environmental Protection Act 1990 s47(4) states that “in making requirements as respects receptacles under subsection (2) above, the authority may, by the notice under that subsection, make provision with respect to:

- (a) the size, construction, and maintenance of the receptacles
- (b) the placing of the receptacles for the purpose of facilitating the emptying of them, and access to the receptacles for that purpose
- (c) the placing of the receptacles for that purpose on highways
- (d) the substances or articles which may or may not be put into the receptacles and the precautions to be taken where particular substances or articles are put into them
- (e) the steps to be taken by occupiers of premises to facilitate the collection of waste from the receptacles
- (f) the removal of the receptacles placed for the purpose of facilitating the emptying of them; and
- (g) the time when the receptacles must be placed for that purpose and removed.”

4.14 S147 of the Highways Act 1980 allows the Council to impose a penalty for the wilful obstruction of the highway, and s147ZA gives the power to require removal of the obstruction and impose a fine if the obstruction is not removed.

## Appendix A - Northampton Town Centre Environmental Policy (Draft)

### Enforcement Action

- 4.15 The Council is committed to working with businesses and commercial waste companies to ensure that no waste is left on the streets outside the timed collection slots specified.
- 4.16 Where businesses fail to work with the Council and persistently continue to place their waste on the highway outside of the timed collection slots breaching their Duty of Care requirements, then enforcement action may be taken under section 47 of the Environmental Protection Act 1990 and the Anti-social Behaviour, Crime and Policing Act 2014 and other legislation as may be appropriate in the circumstances.
- 4.17 The Environmental Protection Act 1990 Section 47 (ZA) provides the facility to specify exact storage methods, containers, and waste types to be placed within these containers. This Notice will be served “in perpetuity” and will remain valid for the period the business occupier remains at that premises. The Notice will fall when the recipient vacates the property, so will not be transferred to new occupiers.
- 4.18 There is a 21-day period within which the person can appeal to the Magistrates Court against the terms of the notice. After the appeal period has expired, if an appeal has been lodged, no further action will be taken until the appeal has been determined. If no appeal was lodged, further visits will be undertaken, either randomly or following complaint/intelligence leads from partner agencies or the public.
- 4.19 Failure to comply with a section 47 Notice will result in prosecution, although the business may avoid prosecution by being offered the opportunity to discharge their liability by payment of a £100 fixed penalty notice (FPN), payable within 14 days.
- 4.20 Failure to pay the FPN will result in the offender being prosecuted. The maximum fine for the offence is the maximum fine set out in legislation (currently £1000.) If further failures are identified after the officer may decide that an FPN is not appropriate and may proceed directly with a prosecution.
- 4.21 If a receptacle is deemed to be causing imminent danger to the public whilst presented on the Public Highway the Council reserves the right to make arrangements for the immediate removal of the receptacle.

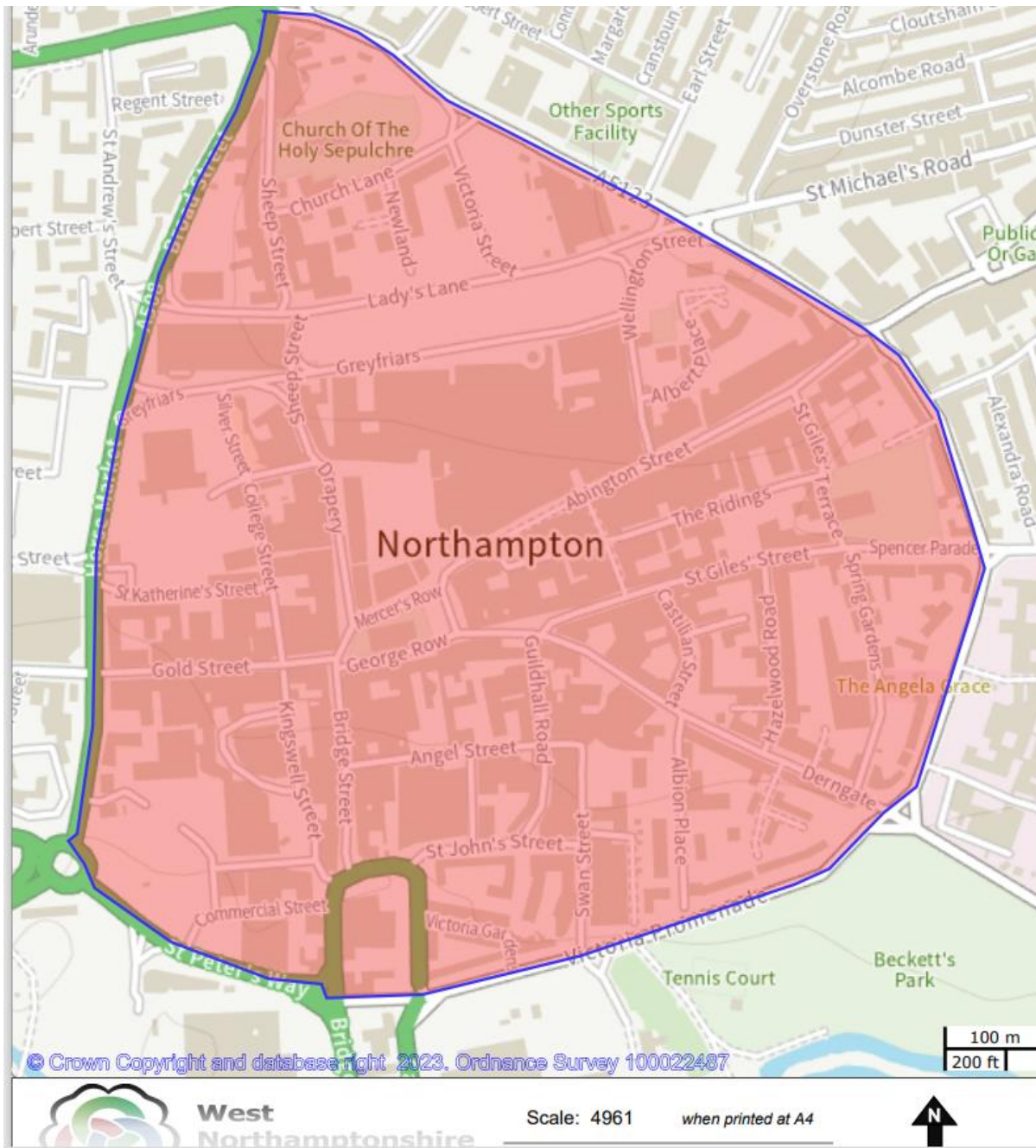
## Appendix A - Northampton Town Centre Environmental Policy (Draft)

### 5.0 Timescales & Implementation

5.1 The plan is to take the Policy to Cabinet May '24 and then to roll out with a soft launch period, this will allow for the Council to work with businesses to educate them and advise on any potential solutions to stay compliant with the Policy.

<b>Date</b>	<b>Event</b>	<b>Action</b>
07/05/24	WNC Cabinet	Seek approval of Policy
By 31/05/24	Finalise Policy	Make any required changes resulting from Cabinet
From 01/06/24	Engage & Educate Phase	Engage, educate and businesses to be compliant with the Policy
From 01/09/24	Enforcement of Policy	Enforcement for non-compliance to commence
September 2025	Review	Review Policy & update as appropriate. Consider any changes to the area of implementation.

### Appendix A – Map of Town Centre and Defined Policy Area







Northampton Town Centre Environmental Policy  
Consultation Results  
February 2024

West Northamptonshire Council (WNC) are looking to introduce a Northampton Town Centre Environmental Policy. This will help with certain environmental standards and set out the way that businesses handle their commercial waste.

To support the introduction of this policy, WNC ran a consultation for over 11 weeks from the end of November until mid-February. The consultation questions were designed to gather views on the following:

- Whether there is widespread support for the Policy
- Opinions on what the issues are with business waste
- Opinions on where the key issues occur within the Town Centre area
- Views on the proposal of timed slots for collections of business waste
- Views on the proposal of holding businesses to account for managing their waste
- The consultation also had some additional questions for businesses to ask their opinions and as to whether they have any concerns regarding the proposals.

To support this consultation further and engage with as many businesses as possible within the proposed area, WNC also

- Sent a communication leaflet to every business (appendix A)
- Carried out a door-to-door engagement exercise to businesses supported by partners (this is still ongoing and to date we have met appx 300 businesses). The purpose of this is to engage with businesses to let them know about the Policy and to encourage them to complete the online consultation

The purpose of consulting was summarised as follows within the introduction to the survey,

*‘Your views will help us gather public opinion, shape parts of the policy that are to do with waste from businesses in the town centre and help us to understand if there are any obstacles that businesses face in respect of their waste.*

*This will form part of a wider project of engagement with Northampton town centre businesses.’*

Consultation responses: There were a total of **106** online responses made up of **84** fully completed responses and **22** incomplete responses. Incomplete means that the respondent has worked through some of the survey and not reached the final point where they can submit. We have included the incomplete responses into our analysis where they have provided an answer.



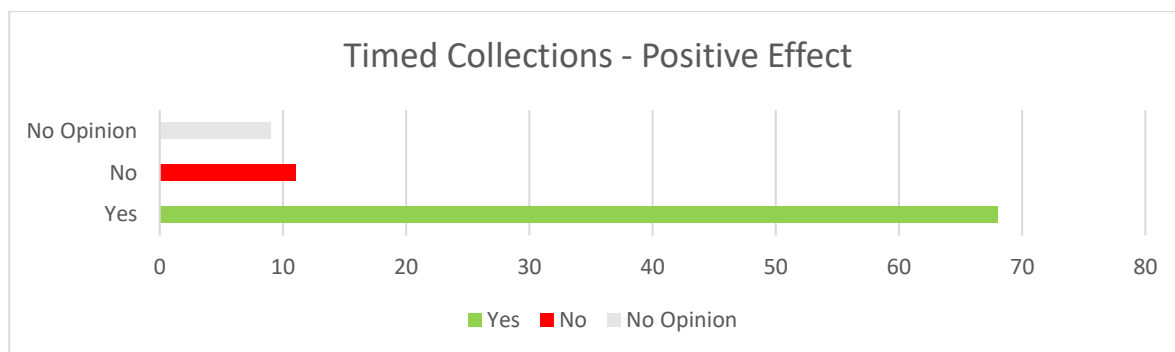
## Appendix C – Northampton Town Centre Policy Consultation Results

### Consultation Analysis

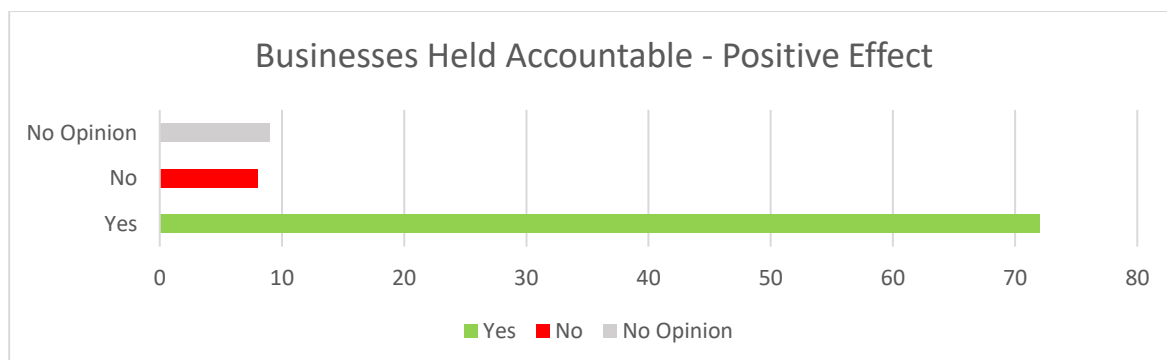
The 106 responses to the consultation can be seen as a good rate of response to the consultation. However, it is disappointing to note that of these 106 responses, only 7 were from businesses.

### Whether there is general support for the Policy

Respondents were asked if they feel **restricting the times that businesses present waste** will have a positive effect on the town centre in respect of trade waste storage and collections. There were 87 responses to this question. 78% gave a positive answer, with only 10% giving a negative answer. For those that answered **No** either of these questions there was a further free text answer these responses can be seen later in this report.



Respondents were asked if they feel **that businesses being held accountable if bins are left out at other times without good reason** will have a positive effect on the town centre in respect of trade waste storage and collections. There were 89 responses to this question. 80% gave a positive answer, with only 10% giving a negative answer.

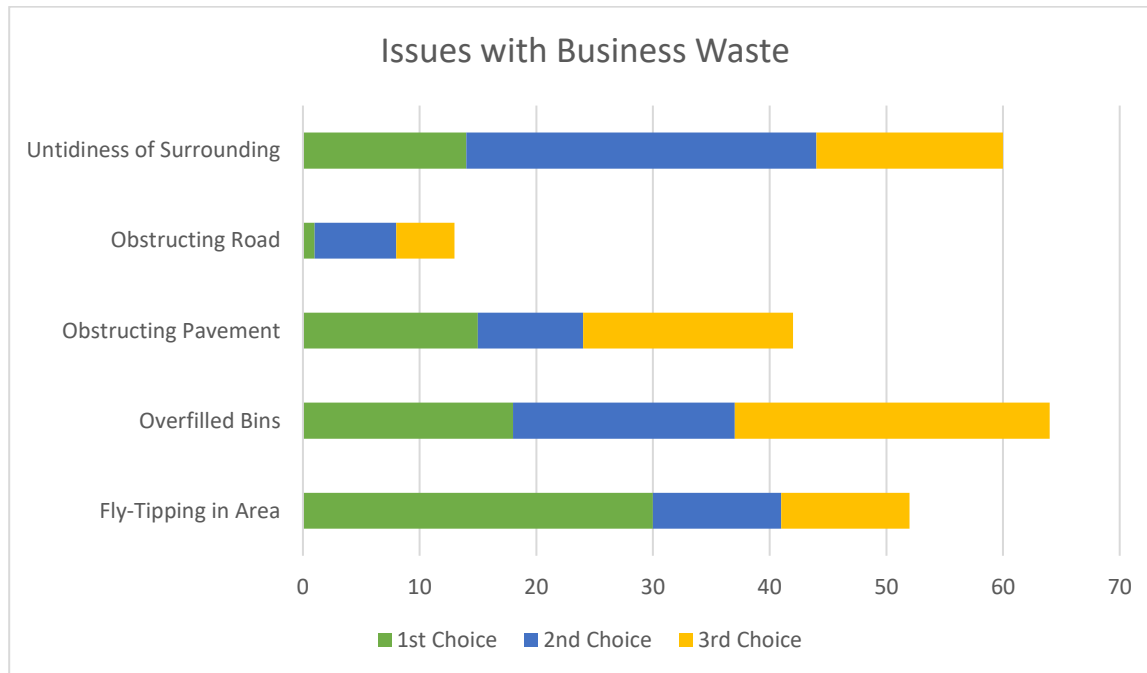


The conclusion from these two questions is that most respondents are supportive of the proposed Northampton Town Centre Environmental Policy.

## Appendix C – Northampton Town Centre Policy Consultation Results

### Opinions on what the issues are with business waste

Respondents were asked what they believe the top 3 issues are in Northampton town centre associated with business waste. There were 77 respondents to this question.

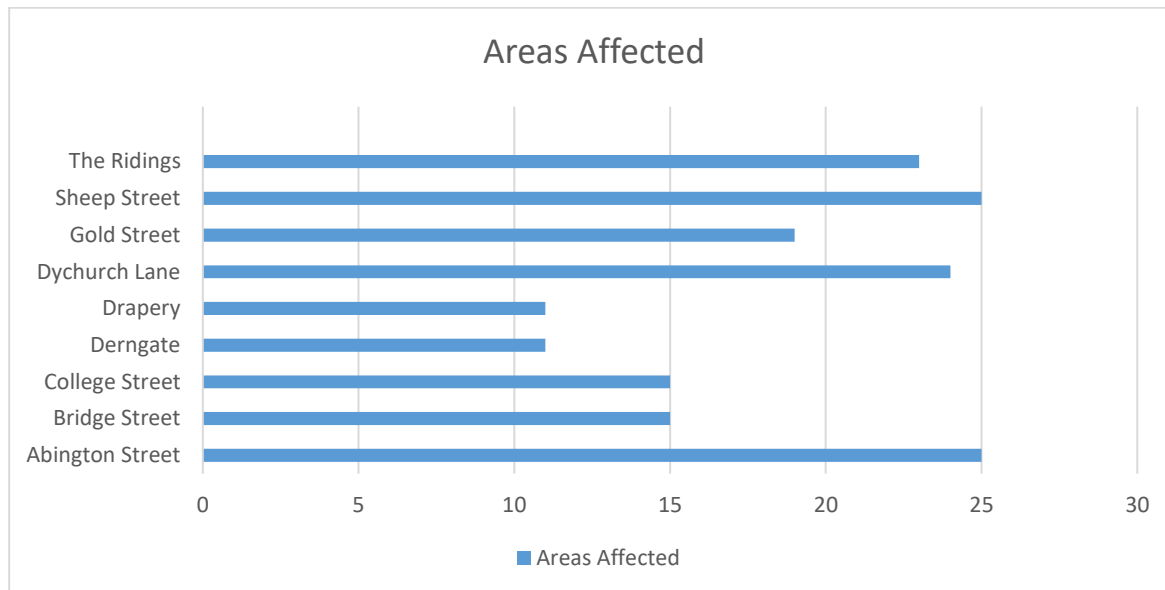


There is no clear conclusion from these responses, however it is noted that **30 respondents** had fly-tipping in the area as the top issue, and **over a half of respondents** had Untidiness of Surrounding area, Obstructing Pavement, Overfilled Bins, or Fly-Tipping in Area as an issue.

## Appendix C – Northampton Town Centre Policy Consultation Results

### Opinions on where the key issues occur within the Town Centre area

Respondents were asked where they feel the issues are occurring and were given the choice of all locations by road name within the proposed Town Centre area. We have included all areas chosen by at least 10 respondents in the chart below.



There are no clear conclusions from these responses. However, it is noted that these locations, and particularly the Top 5, represent potential hotspots that may need further focus when the Policy is rolled out. There is also a consideration as to whether WNC can support further in these locations with alternative solutions to businesses where there is a lack of storage space for waste bins.

### Respondents by Category

Category	Count
A visitor to Northampton town centre from elsewhere in Northampton or any other area	29
A resident in Northampton town centre	25
An employee based in Northampton town centre	14
As a local business in Northampton	6
A local community or voluntary group	4
Work for WNC	1
Northampton resident	1
A member of Northants Litter Wombles	1
A litter picker from NN3 area	1
A Business Elsewhere in West Northants	1
Resident in Northampton	1
West Northants Council employee	1
A West Northamptonshire Councillor	1

## Appendix C – Northampton Town Centre Policy Consultation Results

### Respondents That Answered ‘Disagree’ to Either of the Policy Questions Above

It is a small time slot
This needs to be applied to Wellingborough Road and Kettering Road too. It is small independent shops that have less processes in place for handling their commercial waste.
Companies are not responsible for other people going through their bins or moving them
A lot of business do not have a yard to store the bin in. There are no defined areas for the storage of bins on the street. The council should look at converting some shops into recycling centres for business and bin storage areas with cctv to stop people abusing the. Most retail shops open at 9am and close at 5/6pm and most waste management companies collect before 8am. Therefore, they will either get fined every week for leaving the bin out over night or it will not be emptied.
It is not when waste is stored, it is how waste is stored.
Businesses will continue to fly tip unless there is some form of penalty involved
Business should be made to keep pavements litter free back in the old days out with their sweeping brushes. Have more pride!
The council make it hard enough as it is and rely on litter picking to tidy up the mess
Workforce would be needed to enforce the restrictions. Workforce is lacking for ANY enforcements
Each business is responsible for so many separate collection Bins that they have nowhere to put them other than on the streets
I think they will continue to do it as they do not care. Or as in our area it will encourage more illegal dumping as some do not have anywhere to store their business bins!
We need proper big bins on every street to discard waste bags. These should be empties at least 4 times a week at midnight instead of early morning.

The consultation also had some additional questions for businesses to ask their opinions and as to whether they have any concerns regarding the proposals.

The first question asked business respondents ***to what extent they agree or disagree that the timeslots from 6am to 9am and 4pm to 7pm are suitable times to leave their business waste out for collection.***

- 3 business agreed with the timeslots
- 3 businesses disagreed with the timeslots

## Appendix C – Northampton Town Centre Policy Consultation Results

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The second question asked *if they disagree with the timeslots being suitable what the reason is.*

We cannot store waste as we have no space to do so, and clinical waste cannot be stored inside
I think a wider window in the morning i.e. 6am to 11am and a smaller window in the evening i.e. 4-6pm would be better and have less of an impact on busier early evening periods. It is more likely that there will be people available to deal with issues with uncollected bins/overflowing rubbish in the pre-midday period than post 6pm.
Earlier start might be more appropriate to avoid traffic. Collections used to start about 4:30 am

### Summary and Conclusions

The consultation responses are supportive of the new Northampton Town Centre Environmental Policy. There are comments from respondents regarding the time slots and whether they need changing.

As a result of the consultation the project group have concluded to:

1. Proceed with the proposal to implement the Policy.
2. Incorporate an engage and educate period of at least three months during the Policy rollout to help businesses resolve any issues.
3. Review the policy after one year to assess if any adjustments are required.
4. As part of the review, consider additional areas that could potentially benefit from an extension of the Policy.

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**West  
Northamptonshire  
Council**

# Northampton Town Centre Environmental Policy



# Project Objective

To remove the growing accumulation of commercial waste bins from the streets of Northampton town centre.

Timing to link with completion of Town Centre regeneration works to maximise the positive impact of the investment.





# Consultation

- Presentations to BID, Northampton Town Council & Northampton Forward Board
- Public consultation – 11 weeks between 30 November 2023 and 18 February 2024
- 106 responses (only 7 from businesses)
- Responses broadly supportive of the policy
- Confirmed most affected areas, and desire for extension to wider area

# Further engagement with businesses

- All businesses in the affected area leafleted at start of process
- WNC Officers have visited businesses in late Jan early Feb and more visits being planned.
- 418 businesses visited
  - 63 businesses with no waste contract in place
  - 40 with no offsite storage
- Contacted the main waste contractors operating in the Town Centre.





# No onsite storage - options considered

1. Provide bin stores
2. Allow storage in demarked areas
3. More frequent collections – bags stored on premises
4. Facilitate alternate waste storage options (e.g. Grosvenor)
5. Promote Commercial Waste Service at HWRCs

# Phased Approach

- To be effective, the policy will require enforcement action
- Propose initial engagement / grace period (for 3 months) with enforcement from September
- Resource requirement – additional 3-4 enforcement staff
- Review policy after 12 months
- Consider possibility of additional locations
- **Outcome - more attractive town centre**



# Bristol example

Example of work carried out by Bristol City Council - next slides borrowed with pride!



# Bristol Process

- Step 1 – initial letter/ leaflet delivered and bins labelled
- Step 2 - Follow-up visits to discuss progress repeated 4 times
- Step 3 – Section 47 EPA notices served on businesses and section 149 Highways Act notices on waste contractors
- Step 4 – Bin seizures and contractors invoiced
- Step 5 – Fixed penalty notices issued for non-compliance
- Step 6 – area handed over to contractor for ongoing enforcement



# Bristol Results

- Initial pilot was carried out in the Old City :
    - 102 commercial trade bins no longer on the streets
    - 8 commercial bins seized
    - No FPNs issued
  
  - Phase 2
    - 346 commercial trade waste bins belonging to 90 businesses no longer on streets
    - 53 commercial trade waste bins have been seized
    - No FPNs issued
  
  - Phase 3
    - 113 commercial trade waste bins belonging to 81 businesses no longer on streets
    - 12 commercial bins seized
    - 5 FPNs issued
    - Around 700 businesses visited and now over 500 bins removed from streets
- Commercial waste companies throughout these phases do not do anything until they are threatened with cost of reclaiming bins

# Bristol results

## King Street BS1:

Before



After



## Baldwin Street BS1:

Before



After



## Clair Street / St Stephens Avenue BS1:

Before



After



## King William Avenue BS1:

Before



After



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## Northampton Town Centre Environmental Policy

### Consultation Results

February 2024

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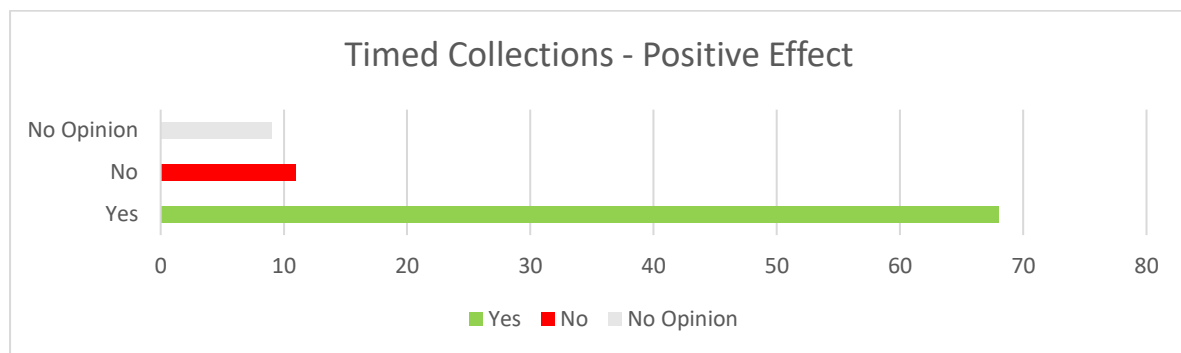


## Consultation Analysis

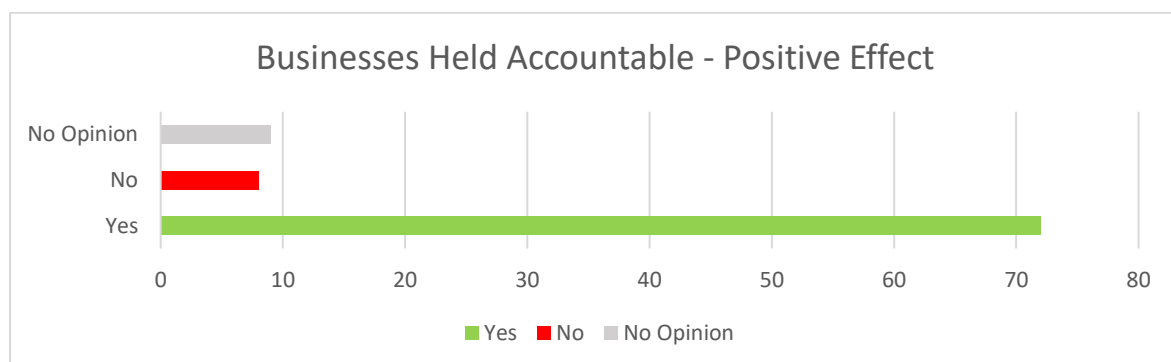
The 106 responses to the consultation can be seen as a good rate of response to the consultation. However, it is disappointing to note that of these 106 responses, only 7 were from businesses.

### Whether there is general support for the Policy

Respondents were asked if they feel **restricting the times that businesses present waste** will have a positive effect on the town centre in respect of trade waste storage and collections. There were 87 responses to this question. 78% gave a positive answer, with only 10% giving a negative answer. For those that answered **No** either of these questions there was a further free text answer these responses can be seen later in this report.



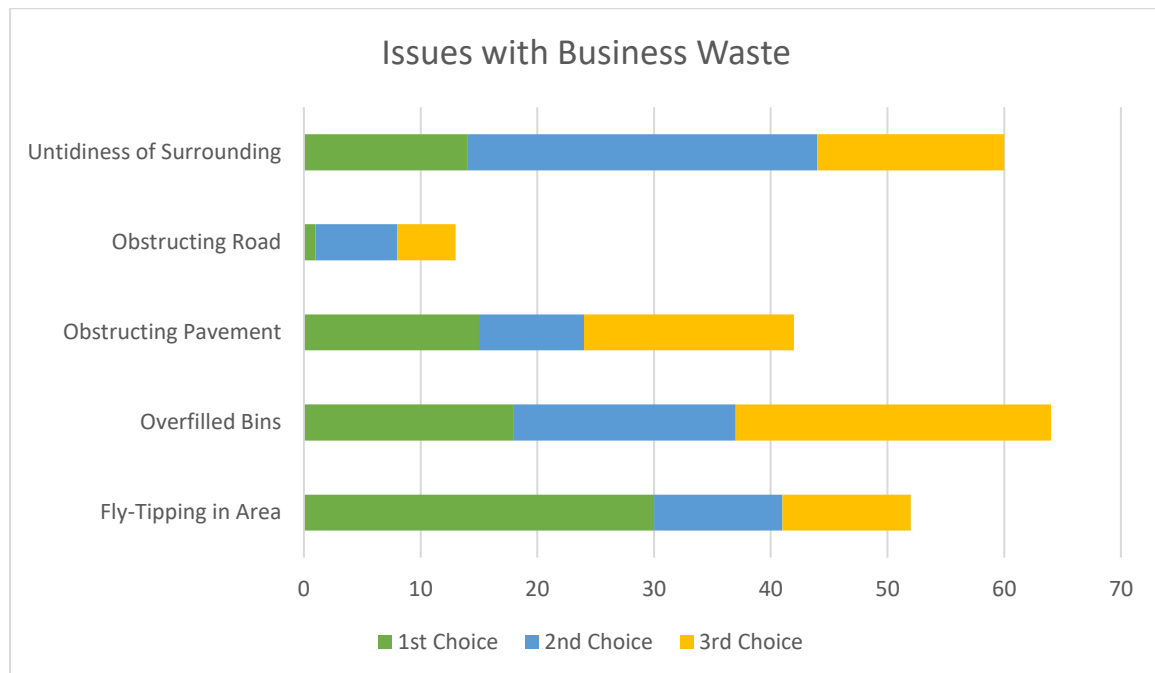
Respondents were asked if they feel **that businesses being held accountable if bins are left out at other times without good reason** will have a positive effect on the town centre in respect of trade waste storage and collections. There were 89 responses to this question. 80% gave a positive answer, with only 10% giving a negative answer.



The conclusion from these two questions is that the majority of respondents are supportive of the proposed Northampton Town Centre Environmental Policy.

## Opinions on what the issues are with business waste

Respondents were asked what they believe the top 3 issues are in Northampton town centre associated with business waste. There were 77 respondents to this question.

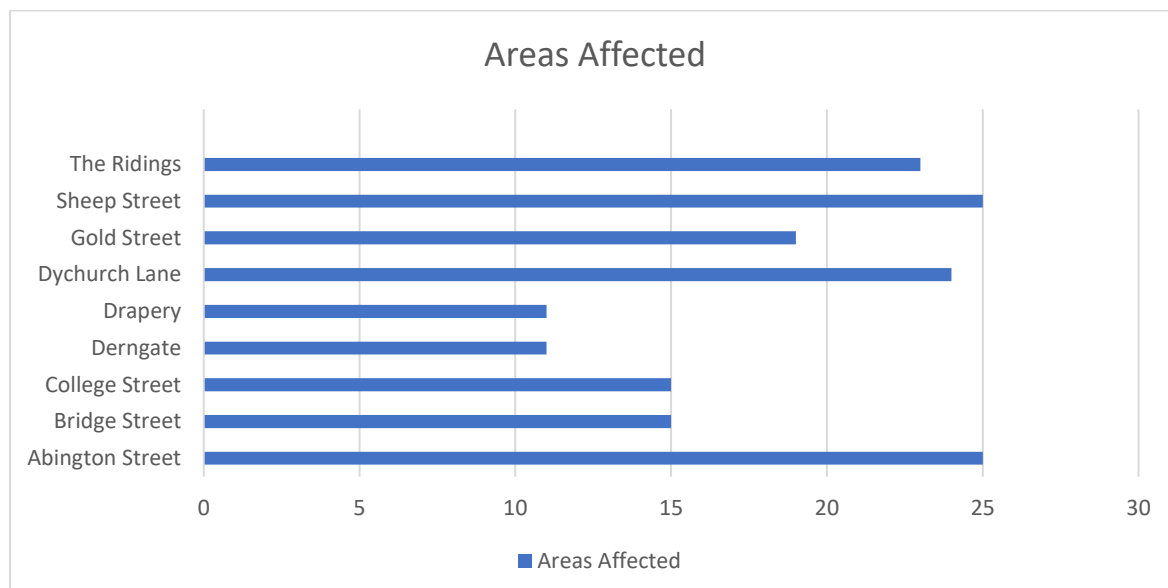


There is no clear conclusion from these responses, however it is noted that **30 respondents** had fly-tipping in the area as the top issue, and **over a half of respondents** had Untidiness of Surrounding area, Obstructing Pavement, Overfilled Bins, or Fly-Tipping in Area as an issue.



## Opinions on where the main issues occur within the Town Centre area

Respondents were asked where they feel the issues are occurring and were given the choice of all locations by road name within the proposed Town Centre area. We have included all areas chosen by at least 10 respondents in the chart below.



There are no clear conclusions from these responses. However, it is noted that these locations, and particularly the Top 5, represent potential hotspots that may need further focus when the Policy is rolled out. There is also a consideration as to whether WNC can support further in these locations with alternative solutions to businesses where there is a lack of storage space for waste bins.

## Respondents by Category

Category	Count
A visitor to Northampton town centre from elsewhere in Northampton or any other area	29
A resident in Northampton town centre	25
An employee based in Northampton town centre	14
As a local business in Northampton	6
A local community or voluntary group	4
Work for WNC	1
Northampton resident	1
A member of Northants Litter Wombles	1
A litter picker from NN3 area	1
A Business Elsewhere in West Northants	1
Resident in Northampton	1
West Northants Council employee	1
A West Northamptonshire Councillor	1

### Respondents That Answered 'Disagree' to Either of the Policy Questions Above

It's a very small time slot
This needs to be applied to Wellingborough Road and Kettering Road too. It's small independent shops that have less processes in place for handling their commercial waste.
Companies are not responsible for other people going through their bins or moving them
A lot of business do not have a yard to store the bin in. There are no defined areas for the storage of bins on the street. Maybe the council should look at converting some shops into recycling centres for business and bin storage areas with cctv to stop people abusing the. Most retail shops open at 9am and close at 5/6pm and most waste management companies collect before 8am. Therefore, they will either get fined every week for leaving the bin out over night or it will not be emptied.
It's not when waste is stored, it's how waste is stored.
Businesses will continue to fly tip unless there is some form of penalty involved
Business should be made to keep pavements litter free back in the old days out with their sweeping brushes. Have more pride!
The council make it hard enough as it is and rely on litter picking gros to tidy up the mess
Manpower would be needed to enforce the restrictions. Manpower is lacking for ANY enforcements
Each business is responsible for so many separate collection Bins that they have nowhere to put them other than on the streets
I think they will continue to do it as they don't care. Or as in our area it will encourage more illegal dumping as some don't have anywhere to actually store their business bins!
We need proper big bins on every street to discard waste bags. These should be empties at least 4 times a week at midnight instead of early morning.

The consultation also had some additional questions for businesses to ask their opinions and as to whether they have any concerns regarding the proposals.

The first question asked business respondents ***To what extent they agree or disagree that the timeslots from 6am to 9am and 4pm to 7pm are suitable times to leave their business waste out for collection.***

- 3 business agreed with the timeslots
- 3 businesses disagreed with the timeslots

The second question asked ***if they disagree with the timeslots being suitable what the reason is.***

We can't store waste as we have no space to do so and clinical waste can't be stored inside
I think a wider window in the morning i.e. 6am to 11am and a smaller window in the evening i.e. 4-6pm would be better and have less of an impact on busier early evening periods. It is more likely that there will be people available to deal with issues with uncollected bins/overflowing rubbish in the pre-midday period than post 6pm.
Earlier start might be more appropriate to avoid traffic. Collections used to start about 4:30 am

## **Summary and Conclusions**

The consultation responses are generally supportive of the new Northampton Town Centre Environmental Policy. There are comments from respondents regarding the time slots and whether they need changing.

As a result of the consultation the project group have concluded to:

1. Proceed with the proposal to implement the Policy.
2. Incorporate an engage and educate period of at least three months during the Policy rollout to help businesses resolve any issues.
3. Review the policy after one year to assess if any adjustments are required.
4. As part of the review, consider additional areas that could potentially benefit from an extension of the Policy.

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# WEST NORTHAMPTONSHIRE COUNCIL CABINET

7 May 2024

**CLlr Adam Brown – Cabinet Member for Housing, Culture and Leisure**

<b>Report Title</b>	<b>Homelessness and Rough Sleeping Strategy 2024-27: Delivery Plan, Year 1</b>
<b>Report Author</b>	<b>Jacqueline Brooks – Housing Services Manager (Strategy and Enabling</b> <a href="mailto:jacqueline.brooks@westnorthants.gov.uk">jacqueline.brooks@westnorthants.gov.uk</a> <b>Sarah Credland – Homelessness Strategy Officer</b>

## List of Approvers

<b>Monitoring Officer</b>	Catherine Whitehead	16/04/2024
<b>Chief Finance Officer (S.151)</b>	Martin Henry	16/04/2024
<b>Other Director</b>	Jane Carr	
<b>Head of Communications</b>	Becky Hutson	16/04/2024

## List of Appendices

**Appendix A:** West Northamptonshire Homelessness and Rough Sleeping Strategy, 2024-2027: Delivery Plan

### **1. Purpose of Report**

- 1.1 To seek approval of the West Northamptonshire Homelessness and Rough Sleeping Strategy (2024-2027) Delivery Plan, Year 1.
- 1.2 To note that following the adoption of the West Northamptonshire Homelessness and Rough Sleeping Strategy (2024-2027) in March 2024, the document has now been designed in a corporate format.

## **2. Executive Summary**

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- 2.1 S 2. of the Homelessness Act 2002 sets out the duty on local authorities to:
- Carry out a homelessness review
  - Formulate and publish a homelessness strategy based on that review.
  - The strategy must be published every 5 years, or sooner if circumstances change.
- 2.2 MHCLG’s 2018 Ending Rough Sleeping Strategy required that by winter 2019 all local authorities must update their strategies and rebadge them as homelessness and rough sleeping strategies; ensure they were available online and that local authorities report progress in delivering these strategies and publish annual action plans.
- 2.3 DLUHC’s 2022 strategy committed government to Ending Rough Sleeping for Good, through a focus on prevention, intervention, recovery and a transparent, joined up system.
- 2.4 The West Northamptonshire Homelessness and Rough Sleeping Strategy was developed to provide an aligned and harmonised approach to homelessness prevention, relief, and joint working across West Northants. This will help in meeting the emergency and longer-term housing needs of the most vulnerable of West Northamptonshire’s residents whilst protecting finances by reducing demand for temporary accommodation by ensuring more effective homelessness prevention and greater opportunities and support to help those who become homelessness to move on to settled housing solutions.
- 2.5 Development of the strategy involved engagement with a wide range of key partner agencies and independently commissioned research which incorporated views of those with lived experience of homelessness.
- 2.6 In accordance with the Local Government (Structural Changes) Transitional Arrangements) (No.2) Regulation 2008, (regulation 12) (as amended coronavirus amendment regulation) West Northamptonshire Council required new Homelessness and Rough Sleeping Strategy by April 2024.
- 2.7 Cabinet approved the Strategy on March 12, 2024, on the basis that a robust Delivery Action Plan, aligned to the objectives and priorities set out in the strategy, would be produced with partners and presented to Cabinet in May 2024.

## **3. Recommendations**

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- 3.1 It is recommended that the Cabinet:

- a) Approve the West Northamptonshire Homelessness and Rough Sleeping Strategy (2024-2027): Delivery Plan, Year 1.

#### **4. Reason for Recommendations**

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- 4.1 To accord with legislation which requires that a local authority formulate and publish a homelessness and rough sleeping strategy.
- 4.2 To accord with legislation which requires a harmonised Homelessness and Rough Sleeping Strategy. The strategy was adopted by Cabinet in March 2024. The Delivery Plan provides the detail on how the objectives and priorities within the strategy will be delivered.

#### **5. Report Background**

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- 5.1 The Homelessness and Rough Sleeping Strategy identified four key themes, these were aligned to the government's 2022 Ending Rough Sleeping for Good Strategy, which focusses on Prevention, Intervention, Recovery and a transparent, joined up system.
- 5.2 The four strategic themes are:
- Theme 1: Improve collaborative partnerships to make homelessness everyone's business
  - Theme 2: Early joined-up intervention and prevention of homelessness
  - Theme 3: Increase provision and access to suitable and sustainable settled housing solutions
  - Theme 4: Ensure that when rough sleeping occurs, it is rare, brief and non-recurring
- 5.3 To deliver these themes, the strategy set out associated objectives and priorities for each.
- 5.4 The delivery plan details the actions and measures needed to achieve each of themes, objectives and priorities, which are set out below.
- 5.5 While this is a three-year strategy (2024-2027), the Delivery Plan will be on a 12-month basis, to reflect the changing environment, both locally and nationally around homelessness and rough sleeping, thus allowing for the actions to be flexible and resilient.
- 5.6 This 12-month delivery plan is a 'live' document and will be reviewed regularly to identify existing and emerging risks to delivery, but also to ensure that it reflects changes within the homelessness and rough sleeping environment.
- 5.7 The progress of the Delivery Plan will be presented to Cabinet on an annual basis, and will be updated to reflect the following year key actions.
- 5.8 **Theme 1: Improve collaborative partnerships to make homelessness everyone's business**

We will do this by working with a wide range of partners and organisations through:

- Providing strong governance and delivery of partnership projects
- Deliver a collaborative multi-agency homelessness approach that facilitates early interventions
- Explore joint-commissioning opportunities to improve & enhance the delivery of a range of homelessness services.
- Understand the barriers to accessing services so we can improve access for specific communities and localities.
- Share knowledge and experience and to understand each other's business
- Improve signposting to homelessness services and support
- Strengthening relationships with Registered Providers (RPs) who have a strong presence across the area and who deliver good quality housing, to improve sustainable move on options.
- Evidence what works and where gaps in needs and services remain.
- Securing support and investment across a range of council services and external partners to break down silos and pool resources to maximise the support available.

## **1.2 Embedding a person-centred approach**

We will do this by working with a wide range of partners and organisations through:

- Minimise the need for people to repeat information about traumatic experiences.
- Establish specialist multi-disciplinary and co-located teams
- Understand trauma informed approaches to develop service provision that supports better outcomes for customers.
- Include those with lived experience of homelessness or rough sleeping in the design and delivery of services.

## **5.7 Theme 2: Early identification, intervention and prevention of homelessness**

### **2.1 Increase our early intervention services**



We will do this by delivering, with a wide range of organisations and partners:

- Deliver accessible, high quality, up-to-date information and guidance, to help residents address their housing difficulties when these first arise
- Deliver a programme of awareness raising initiatives across community settings, including schools on tackling issues that may result in homelessness
- Deliver improved collection and analysis of data to identify households at risk of homelessness and inform service delivery

## **2.2 Provide effective homelessness prevention services**

We will do this by developing and delivering services that:

- Ensure that residents can access the right service from the right organisation at the right time
- Strengthen consistent provision, access to and promotion of housing, debt and money advice services across West Northants
- Encourage housing providers to identify and assist households at risk of homelessness at the earliest point possible
- Develop effective financial and other interventions and assistance to prevent homelessness
- Ensure new West Northants Housing Allocations Scheme is effective in preventing homelessness through access to settled homes

## **2.3 Reduce the instances of people facing repeated homelessness**

We will do this by delivering, with a wide range of organisations and partners, services that:

- Support households to make timely and accurate claims for financial support with their housing costs to create sustainable tenancies and avoid arrears
- Ensure those experiencing domestic abuse have appropriate support to remain in safe, settled accommodation, avoiding need for repeated moves
- Develop resident's skills and strengths to support them to build skills and confidence and develop resilience and self sufficiency
- Provide appropriate targeted support for people with more complex needs to help sustain tenancies

## **5.8 Theme 3: Increase provision and access to suitable and sustainable settled housing solutions**

### **3.1 Increase the supply of new affordable housing**

We will do this by:

- Increase the number of council homes
- Increase the supply of new social rented homes at a social rent level
- Explore the provision of modular homes and other innovative forms of accommodation
- Maximise grant funding opportunities and ensure continual engagement with Homes England and DLUHC.
- Utilise and make best use of Council land assets and resources

### **3.2 Reduce the number of households in and cost of temporary accommodation**

We will do this by:

- Ensuring value for money in the procurement of temporary accommodation.
- Reducing the number of households needing temporary accommodation
- Ensure that we have a sufficient supply of affordable temporary accommodation to meet demand and is of the right type, quality and in right location
- Provide effective support and advice to households living in temporary accommodation, to enable them to move onto settled, sustainable homes more quickly.
- Increase the supply of Council owned temporary accommodation

### **3.3 Improve access to good quality, affordable private rented accommodation**

We will do this by:

- Utilise our full range of statutory powers to tackle substandard private rented properties.
- Improve support and incentives available to the private rented sector into a single 'offer' for landlords

## **5.9 Theme 4: Ensure homelessness when it occurs is rare, brief and non-recurring**

### **4.1 Reduce prevalence of rough sleeping**

We will do this by working with partners to:

- Implement recommendations of safeguarding reviews to improve service delivery and design
- Embed an understanding of Multiple Exclusion Homelessness throughout the sector
- Deliver and improve support to reduce rough sleeping
- Assess the impact and outcome of the Rough Sleeping Initiatives funded projects
- Improve data collection and analysis across services to better understand outcomes

### **4.2 Co-produce a joined-up pathway which supports people with complex needs who experience homelessness**

We will work with a range of partners to:

- Develop a framework of supported accommodation provision and housing related support
- Develop a coordinated and joined-up approach bringing together a range of partners to deliver personalised support to enable long term recovery
- Secure support and investment across a range of services (Housing, Health, Adult Social Care)
- Embed co-production with people with lived experiences into new service delivery.

### **4.3 Help people settle into homes where they can thrive**

We will develop innovative services that:

- Develop and adopt housing-led principles throughout our support services, specialist housing provision and mainstream accommodation options.
- Deliver targeted support and services for women at risk of and experiencing homelessness.
- Improve access to rapid 'off-the-street' options for rough sleeping.

5.10 We can only achieve the actions set out in our delivery plan, through innovative and close work with our key partners. The Housing Partnership Board (HPB) will be a catalyst for strong strategic governance and leadership and the delivery of the strategy.

## **6 Issues and Choices**

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- 6.1 It is a legal requirement under s.2 Homelessness Act 2002, that Local Authorities conduct a homelessness review and formulate and publish a homelessness strategy based on that review.
- 6.2 West Northamptonshire Council was required to have a harmonised Homelessness and Rough Sleeping Strategy by April 2024. This was approved at March 2024 Cabinet
- 6.3 To ensure the priorities of the strategy are delivered, it is recommended that the delivery plan, which contains the actions and measures to achieve the priorities, be approved.

## **7 Implications (including financial implications)**

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### **7.1.1 Resources and Financial**

- 7.1.2 The approval of the Homelessness and Rough Sleeping Strategy did not in itself incur any new revenue or capital liabilities for either the Housing Revenue Account or the general fund.
- 7.1.3 The implementation of and delivery of the Homelessness and Rough Sleeping Strategy requires significant investment of time and resource by existing council staff and its partners. The delivery plan contains actions that are likely to have a financial impact. If the financial impact cannot be covered within existing resources, business plans will be produced to determine if additional resources are required and how they will be funded.
- 7.1.4 The delivery plan will be an ever-evolving document and if additional resources are required in the future they may be considered as part of the normal budget setting process.
- 7.1.5 Throughout the lifetime of the strategy there will be some specific projects and developments where decisions will need to be made and the full revenue and capital implications will be made clear at the time. None of the projects or development will be able to proceed until the appropriate funding is agreed and in place.

### **7.2 Legal**

7.2.1 The Homelessness Act 2002 sets out the legal duty on local housing authorities to formulate, adopt and publish a homelessness strategy, based on the results of a homelessness review for their area, at least once every five years. Authorities also have a duty to keep their strategy under continuous review and have a power to consult upon and modify it as and when they deem necessary.

7.2.2 A homelessness review is a review of:

- the current and predicted levels of homelessness in a local housing authority's area, and;

- the activities it carries out for the purposes of preventing homelessness and securing temporary accommodation and/or support for people who are or may become homeless or have been so and need support to prevent them becoming homeless again.

7.2.3 A homelessness strategy is a strategy for:

- preventing homelessness in a local housing authority's area,
- securing that sufficient accommodation is and will be available for people who are or may become homeless and
- securing satisfactory support for people who are or may become homeless or have been so and need support to prevent them becoming homeless again.

7.2.4 The strategy must consider how the local housing and social services authorities (if different) and any other public authority, voluntary organisation or anyone else can meet the objectives of the strategy. It may include specific actions or objectives to be undertaken by the local housing and social services authorities, or, with its agreement, by any other public authority, voluntary organisation or anyone else.

7.2.5 In formulating or modifying a homelessness strategy, a local housing authority must have regard to its current allocation scheme and tenancy strategy. Homelessness and Equalities legislation requires that a local housing authority must consider the needs of all groups of people in its area who may be affected by homelessness.

7.2.6 Once the strategy has been adopted, it must be made available for public inspection without charge, and copies made available on payment of a reasonable charge.

### 7.3 Risk

7.3.1 There is a legal requirement before adopting a homelessness strategy the authority shall consult such public or local authorities, voluntary organisations or other persons they consider appropriate. The council has taken a co-production approach to developing this first West Northants Homelessness & Rough Sleeping Strategy through extensive engagement with internal and external stakeholders including statutory external partners and voluntary, community and faith sector organisations.

### 7.4 Consultation and Communications

7.4.1 The delivery plan and the associated actions was developed through the feedback and comments received through the consultation and engagement with partners during the drafting of the strategy, and regular discussions with internal teams and key partners.

### 7.5 Consideration by Overview and Scrutiny

7.5.1 A presentation was provided to Children’s, Education and Housing Overview and Scrutiny on the 3rd April 2024. This provided an overview of the delivery plan and the key actions needed to deliver the West Northants Homelessness and Rough Sleeping Strategy.

7.6 **Climate Impact**

None

7.7 **Community Impact**

7.7.1 An Equality Screening Assessment in respect of the Homelessness and rough sleeping strategy was completed as part of the Homelessness and Rough Sleeping Strategy.

8 **Background Papers**

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8.7 West Northamptonshire Homelessness and Rough Sleeping Strategy 2024-2027

## Homelessness and rough sleeping strategy delivery plan, Year 1: 2024-25

### Theme 1: Improve collaborative partnerships to make homelessness everyone's business.

Objectives	Priorities	Actions	Responsibility	Key Partners	Measure	Resources Required	Target Date/ Milestones
<b>1.1 Strengthen collaborative working</b>	1.1.1 Provide strong governance and delivery of partnership projects	Annual review and refresh of the Housing Partnership Board	Housing Partnership Board members (HPB)	NCT ASC PH NPH GUHG FHG	KPIs	Staff resources	Q1
		Delivery of HPB 24/25 work programme	HPB	NCT ASC PH NPH GUHG FHG	KPIs	Staff resources	Ongoing
		Review and refresh Single Homelessness and Homelessness Prevention Networks to link with HPB; Anti-Poverty Strategy Oversight Board and DA/SV Board and Health and Wellbeing Board	HSP	Memberships of SHF and HPN Homeless Link		Staff resources	Q1
	1.1.2. Deliver a collaborative multi-agency homelessness framework that facilitates early interventions	Ensure relevant Housing staff attend and implement MECC training delivered by Public Health	PH	Housing Solutions  Local partners	Numbers attending MECC training	Staff resources	Ongoing
		Research best practice models for collaborative approaches to early homeless intervention	HSP  Transformation	Housing Solutions ASC NCT PH	Report / Business case on models	Staff resources	Q2

	1.1.3 Explore joint-commissioning to improve and enhance delivery of homelessness services	Understand the housing needs for customers of Adult Social Care and Children's Services (NCT)	HSP ASC NCT	HPB	Report following workshop	Staff resources	Q2
		Research good practice models of provision for identified housing needs for customers of Adult Social Care and Children's Services	HSP	ASC NCT HPB	Report	Staff resources	Q2
		Prepare Business Case for 1x new ASC and 1x new NCT housing scheme	HSP ASC NCT	HPB	Business Case	Staff resources	Q3
		Complete Domestic Abuse and Sexual Violence needs assessment refresh	CST	DA specialist providers HSP Housing Solutions	Delivery of needs assessment	Staff resources	Q3
		Complete revised DA and SV strategy			Adoption of new strategy	Budget	Q4
		Develop service specification and commission Safe Accommodation for victim survivors of Domestic Abuse	CST HSP	DA/SV Board RPs NPH ASC	Service specification Tender Process Contract Award	Staff resources  Budget held in Community Safety	Q4



	<p>1.1.4 Understand the barriers experienced by customers in attempting to access our services</p>	<p>Engage with local communities to understand barriers to accessing our services by utilising the existing tools and networks that are in place to gather community insight, including:</p> <ul style="list-style-type: none"> <li>• The Community Development Team, working in our most deprived areas</li> <li>• Our Community Engagement Team, working with our communities that are most vulnerable and face inequality</li> <li>• Through Local Area Partnerships and other networks and forums.</li> </ul>	<p>CST LAP Leads</p>	<p>Community groups Customer services HSP Housing Solutions</p>	<p>Numbers/groups of communities engaged</p> <p>Forums attended</p> <p>Case studies/lived experienced gathered</p>	<p>Staff resources</p>	<p>On-going</p>
	<p>1.1.5 Share knowledge and experience to understand each other's business.</p>	<p>Deliver a 12 month programme of 'Learning networks' and relevant training within Housing and Communities; Communities and Opportunities and relevant partners</p>	<p>Housing teams HSP Transformation Team</p>	<p>ASC NCT NHFT External key partner organisations</p>	<p>Number of sessions delivered and attendees</p>	<p>Staff time</p>	<p>Ongoing</p>
	<p>1.1.6 Improve signposting to homelessness services and support</p>	<p>Identify housing and homelessness issues to be included in the CTP programme</p> <p>Prepare material to support CTP programme</p>	<p>Community Training Partnership Housing Solutions</p>	<p>Community Engagement team HPN SHF HSP Anti-Poverty Strategy Oversight Group</p>	<p>Number of sessions and attendance of sessions delivered by CTP covering housing and homelessness issues</p>	<p>Staff time</p>	<p>Q2</p>

		Review the Homelessness Prevention Network and Single Homeless Forum to ensure partners are kept up to date on service provision for those at risk of or who are homeless	Housing Solutions HSP	HPN, SHF membership	Number of forum meetings held	Staff time	Ongoing	
1.1.7 Strengthening relationships with Registered Providers (RPs) who have a strong presence across the area and who deliver good quality housing, to improve sustainable move on options.		Ensure key stockholding RPs are included in Supported Housing Provider Forum (SHPF)	HSP	NPH GUHG Futures Other key RPs	Attendance at SHPF	Staff time	Q1	
		Establish a strategic RP Housing Management Forum	HSP PSH Housing Solutions	NPH GUHG Futures Other key RPs ASC	Attendance at forum	Staff time Budget for venue	Q1	
	1.1.8 Evidence what works and where gaps in needs and services remain.		Improve data collection, monitoring and use of intelligence across internal Housing Services, through staff training, procedures manual, supervision and improved reporting and analysis	Housing Solutions HSP	BIPI HPB DTI Transformation	Consistent data collection	Staff resources	Q2
			Improve data collection, monitoring and use of intelligence with relevant WNC services and external partners.	HSP Housing Solutions	BIPI HPB DTI Transformation ASC NCT Public Health Key external partners	Consistent data collection	Staff resources	Q3
			Implement standard KPIs and outcomes evidencing for in-house and commissioned services	HSP Housing Solutions	Public Health Commissioned services	Data on outcomes for customers	Budget for research/software, licencing, and training	Ongoing

		Embed, monitor and act on service user feedback across relevant WNC services and external partners.	HSP Housing Solutions		Good impact stories Complaints, Member and MP Enquiries	Staff time	Ongoing
	1.1.9 Secure support and investment across a range of council services and external partners to break down silos and pool resources to maximise support available.	Develop and implement new working procedures, protocols, action plans and joint training programme across Housing and with NCT	HSP Housing NCT	Public Health NHFT	New protocols, procedure and joint training programme	Specific Budgets	Q3
		Review use of financial support schemes available across the authority to those in housing need	HSP	NPH Revs and Bens	Report and recommendations	Staff time	Q1
		Review working procedures, protocols and action plans for residents with no recourse to public funds (NRPF)	Anti- Poverty strategy Oversight Board HSP Housing solutions	Public Health	Revised procedures / protocols	Staff time	On-going
		Develop and implement new working procedures, protocols, action plans and joint training programme across Housing and with ASC and Health for people with complex needs. <b>See 4.2</b>	HSP Housing Solutions	Public Health NHFT ASC	New protocols, procedure and joint training programme	Staff time	Q3
<b>1.2 Embedding a person-centred approach</b>	1.2.1 Minimise the need for people to repeat information about traumatic experiences	Develop relationships to improve information sharing with domestic abuse and other relevant support services	Housing Solutions HSP	Domestic abuse services CGL NHFT ASC NCT	Establishment of agreed pathways	Staff resources	Q3
		Deliver specialist domestic abuse training to relevant Housing Solutions staff	Housing Solutions	Domestic Abuse Providers	Percentage and number of staff trained	Staff resources	Q2

	1.2.2. Establish specialist multi-disciplinary and co-located teams	<b>See 4.2</b>	Joint Corporate leads Transformation Housing Solutions	Adult Social Care, Housing, NCT, Public Health, Police, Drug and alcohol service and VCS	Establishment of new MDTs	Staff resources Budget	Q4
	1.2.3 Understand trauma informed approaches to develop service provision that supports better outcomes for customers.	Deliver a Trauma informed training programme within Housing.	HSP Housing Solutions	Domestic abuse services CGL NHFT ASC NCT	Number of staff trained	Training budget	Q4
		Explore a Trauma informed training programme throughout WNC	HSP ASC NCT	Customer services	Training programme established		Q2
	1.2.4 Include those with lived experience (LEX) of homelessness or rough sleeping in the design and delivery of services.	Develop framework to embed LEX into policy and service design	HSP ASC	NCT Homeless Link Key accommodation providers and partners NHFT	No. of opportunities and people with LEX involved in service design.	Staff resources Training budget	Q3

<b>Theme 2: Early intervention and prevention of homelessness</b>							
<b>Objectives</b>	<b>Priorities</b>	<b>Actions</b>	<b>Responsibility</b>	<b>Key Partners</b>	<b>Measure</b>	<b>Resources Required</b>	<b>Target Date / Milestones</b>
<b>2.1 Increase our early intervention services</b>	2.1.1 Deliver accessible, high quality, up-to-date information and guidance, to help residents address their housing difficulties when these first arise	Update Housing content on WNC website and improve mutual links to appropriate partner organisation websites.	HSP Housing Solutions DTI Team	Communication and Engagement Customer Services Team RPs and Partner organisations Community Training Partnership (CTP)	Updated webpages	Housing strategy and partnership staffing resource  Housing solutions staffing resource  DTI resource	Q2
		Ensure information is accessible to those with language, literacy, cultural or cognition issues	Customer services team Comms team Housing Solutions	Community and Engagement Team Adult Learning	Number of customers requesting accessible information	Housing Solutions staffing resource  Communication team resource	Q2
	2.1.2 Deliver a programme of awareness raising initiatives across community settings, including schools on tackling key issues that result in homelessness	Scope a programme with partners of awareness raising across community settings  Engage with secondary school head teachers to incorporate programme within the school curriculum throughout 2025/26	Housing Solutions/ HSP	Community and Engagement team CGL Adult Social Care Community safety team Local secondary schools	Plan of events	Housing strategy and partnership staff resource  Housing solutions staff resource	Q2  Q2

	2.1.3. Deliver improved collection and analysis of data to identify households at risk of homelessness and inform service delivery	Ensure this action is scoped in work to identify future ICT solutions	Housing Solutions	DTI	Quality KPI data	Staff resources	Q4
<b>2.2</b> <b>Provide effective homelessness prevention services</b>	2.2.1 Ensure that residents can access the right service from the right organisation at the right time	Complete Housing Solutions service restructure	Housing Solutions	HR	Completion of staff recruitment	Staff resources HR resources	Q2
		Complete Housing Strategy and Partnerships restructure	Housing strategy and partnership team	HR Finance	Completion of staff recruitment	Staff resources HR resources	Q3
		Ensure appropriate first contact processes and triage for customers	Customer services Housing solutions HSP Out of hours team	Communications team NPH RPs	Clear service access points advertised	Housing solutions/ HSP / CSC team resources	Q2
		Scope a service health check to review operation of the restructured Housing Solutions service	Housing Solutions HSP	Procurement	Business case Scope document completed	Consultancy budget Staff resource	Q4
	2.2.2 Strengthen consistent provision, access to and promotion of housing, debt and money advice services across West Northants	Relaunch Debt and Money Advice Service provision across WN, including promotion of service via new webpages	Revenues and Benefits  Anti-poverty Oversight Board	Citizens Advice Community Law Housing Solutions HSP	KPIs	Transformation resource	Q1
2.2.3 Encourage housing providers to identify and assist households at risk of	Develop and implement Pre eviction protocol with RPs	Housing Solutions HSP	Key RPs	Regular RP meetings; pre eviction protocol	Housing solutions and HSP staff resource	Q2	

	homelessness at the earliest point possible	Promote and monitor the use of Duty to Refer and Commitment to Refer	Housing Solutions	All public authorities RPs HPN/ SHF members	H-CLIC stats on Duty to Refer	Housing solutions staff resource	On-going
	2.2.4 Develop effective financial and other interventions and assistance to prevent homelessness	Implement pathways to improve Housing Solutions response to the main causes of homelessness	Housing Solutions	NCT, Health ASC RPs	KPIs	Housing solutions staff resource	Q3
		Review our package of financial interventions to support the prevention of homelessness	Housing HSP PSH	Revenues and Benefits	Short report and recommendations	Budgets for incentives Staff resources	Q2
		Monitor the success and outcomes of financial intervention tools	Housing HSP PSH	Transformation Team	Quarterly monitoring report	Staff resources	Quarterly
		Ensure appropriate range of options for victim survivors of domestic abuse to prevent and relieve homelessness	DA/SV co-ordinator Housing Solutions HSP	WNC DA and SV Board members Commissioning Manager	KPIs Government returns	Staff resources Budgets	Q2
	2.2.5 Ensure new West Northants Housing Allocations Scheme is effective in preventing homelessness through access to settled homes	Monitor and review implementation and impact of new Allocation' scheme	Housing Solutions/ Housing Strategy and Partnerships	Key RPs	KPIs	Staff resources	Q4

<b>2.3 Reduce instances of people facing repeat homelessness</b>	2.3.1 Support households to make timely and accurate claims for financial support with their housing costs to create sustainable tenancies and avoid arrears	Comprehensive review of housing solutions processes and procedures.  Ensure adequate support for customers to make timely claims for financial support to help with housing costs	Housing Solutions team  Revs and Bens  Transformation team	Key supported accommodation providers  NCT	Completed review	Staff resources	Q2       Q3
	2.3.2 Ensure those experiencing domestic abuse have appropriate support to remain in safe, settled accommodation, avoiding repeated moves	Work with community team and DA and SV Board to establish effective solutions and support to inform safer accommodation commissioning	DA Co-ordinator  HSP	WN DA and SV Board  Specialist service providers	Reduced no. of MARAC repeat cases. Reduction in repeat homelessness as a result of DA	Staff resources	Q1
	2.3.3 Develop resident's skills and strengths to support them to build confidence, develop resilience and increase self sufficiency	Housing Solutions to robustly implement PHPs	Housing solutions	RPs	PHPs	Staff resources	On-going
		Scope tenancy ready training package	Housing solutions HSP Community and voluntary organisations	Economic Development Partners delivering tenancy support – training courses, job clubs	Scope document	Staff resources	Q3



	2.3.4 Provide appropriate targeted support for people with more complex needs to help sustain tenancies	Design and commission the new pathways for people with complex needs at risk of homelessness	HSP ASC NCT (for care experienced young people)	NHFT CGL Bridge Public Health Supported accom providers RPs	No, of people making repeat approaches as homeless	Staff resources	Q2
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### Theme 3: Increase provision and access to suitable and sustainable settled housing solutions

Objectives	Priorities	Actions	Responsibility	Key Partners	Measure	Resources Required	Target Date/ Milestones
<b>3.1 Increase the supply of new affordable housing</b>	3.1.1 Increase the number of council homes.	Develop a Housing Delivery Framework	HSP	NPH GUHG FHG Other RPs	Cabinet approval of Strategy document	Staff resource Budget	Q2
		Implement the Housing Delivery Strategy	HSP	NPH GUHG FHG Other RPs	Increased affordable housing provision, KPI	Staff resource Budget	Ongoing
		Deliver the Single Homelessness Accommodation Programme (SHAP)	HSP Regeneration	Homes England DLUHC Assets team Procurement NPH Support Providers	18 self-contained units for people with high needs	Staff resources SHAP funding	End Q4
		Deliver Year 1 of the Local Authority Housing Fund, phase 3 (LAHF)	HSP	NPH Home England DLUHC	14 units	LAHF	Q4
	3.1.2. Increase the supply of new social rented homes let at a social rent level	Agree and maintain development programme with registered providers (as part of Housing Delivery Strategy)  Strengthen intention to deliver social rented provision through guidance and negotiation with developers and RPs  Work with Homes England to identify opportunities to deliver increased social rent tenures	HSP	RPs Planning Homes England	No. of new social rented homes delivered at social rent level	Homes England Affordable Housing Programme	Ongoing

	3.1.3. Explore the provision of modular homes and other innovative forms of accommodation	Link to 3.2.3 for actions in year 1					
	3.1.4 Maximise grant funding opportunities and ensure continual engagement with Homes England and DLUHC	Establish quarterly strategic meetings  Continue 6 weekly operational meetings  Identify and respond to funding opportunities	HSP	Homes England DLUHC	Increase in grant funding	Staff resource	Ongoing
	3.1.5 Utilise and make best use of Council land assets and resources	Develop and approve an assets management strategy	Assets team	HSP Transformation ASC NCT	Cabinet approval of strategy	Staff resource	Q2
<b>3.2 Reduce the number of households in and the cost of temporary accommodation (TA)</b>	3.2.1 Ensure value for money in the procurement of TA	Implement new Dynamic Purchasing System (DPS)	Housing Solutions	Procurement Legal Transformation	Implementation of DPS	Staff Budget	Q1
		Develop an acquisitions project plan	Housing Solutions	Procurement Legal Transformation	Implementation of DPS	Staff Budget	Q1
	3.2.2 Reduce number of households needing TA	Increased efficiency of Housing Solutions Service (Link to 2.1, 2.2, 2.3)	Housing Solutions	Transformation	KPIs (no. in TA and length of stay)	Staff resources TA budget	Ongoing
	3.2.3 Ensure a sufficient supply of affordable TA to meet demand: of the right type, quality and in right location	Develop a Temporary Accommodation Property Project Board	HSP	Transformation Housing Solutions Assets NPH	Delivery of TA transformation project	Staff resources	Q1
		Develop a Temporary Accommodation Policy	Housing Solutions HSP	Transformation	TA Strategy	Staff resources	Q3

		Prepare an options appraisal and business case for relocatable TA	Service Transformation Delivery Manager	Assets HSP; Housing Solutions, NPH Transformation Procurement	Options appraisal and Business case	Staff resources TA budget	Q1
		Increase number of units under Private sector Leasing scheme	Service Transformation Delivery Manager	PSH Housing Solutions Transformation	24 units 2024/25	Staff TA budget	Q4
		Explore potential for additional RP stock for use as TA	HSP	RPs	No. of RP units used as TA	Staff resources	Q2
	3.2.4 Provide effective support and advice to households in TA to enable them to move onto settled, sustainable homes more quickly.	Develop a Temporary Accommodation Policy (see 3.2.3)	Housing Solutions HSP	Transformation	TA strategy	Staff resources	Q3
		Ensure appropriate support to those in TA to move on to sustainable homes	Housing Solutions	Transformation	No. of households in TA	Staff resources	Q2
	3.2.5 Increase the supply of Council owned TA	Deliver the Temporary Accommodation Reduction Acquisition Programme (TARA)	HSP	Assets team NPH	Target of 50 units 2024/25	HRA retained budget Staff resources	Q4
<b>3.3 Improve access to good quality, affordable private rented accommodation</b>	3.3.1 Utilise the full range of statutory powers to tackle substandard private rented properties.	Ensure compliance with Housing Act 2004, in line with the Council's Private Sector Housing Enforcement Policy	PSH	Legal Services	Enforcement Activity Report	Staff resources	Q1 / on-going
	3.3.2 Improve support and incentives available to the private rented sector into a single 'offer' for landlords	Ensure solutions in 2.2.4 available used to help people access the PRS as well as remain in it	Housing Solutions PSH HSP	Revenues and Benefits	No. of people accessing PRS via financial incentives	HPG/ funds for schemes	Q2

**Theme 4: Ensure that where rough sleeping occurs, it is rare, brief and non-recurring.**

Objectives	Priorities	Actions	Responsibility	Key Partners	Measure	Resources Required	Target Date / Milestones
<b>4.1</b>  <b>Reduce prevalence of rough sleeping</b>	4.1.1	Establish monthly Strengths-Based Forum to review complex cases (individual case discussions)	ASC Housing Solutions (RS service manager)	NHFT Health/ NGH Police VCSE as relevant	No. of people sleeping rough and outcomes for customers	Staff time	Q1
		Implement recommendations of safeguarding adult reviews to improve service delivery and design	Establish monthly joint Operational meeting to consider learning and recommendations and policy/ procedure changes	ASC Housing Solutions (RS service manager)	No. of people sleeping rough and outcomes for customers	Staff time	Q1
	4.1.2	Embed an understanding of Multiple Exclusion Homelessness throughout the sector	Deliver MEH training programme throughout WNC and partners	Adult Social Care - Safeguarding Housing Solutions (RS service manager)	NSAB Customers facing homelessness ASC Housing Teams Supported housing providers and VCSE orgs. Elected members	1 full day session per quarter  Number trained/ resourced programme of delivery.	Staff resources to deliver MEH training

		Improve understanding and joint working around the needs of care experienced young people (see 1.1.3)	NCT HSP	ASC Housing Solutions	Report following workshop	Staff resource	Q2
		Improve understanding and needs of inclusion groups when experiencing / facing homelessness	Public Health	HSP Regulatory Services PSH	Improved access to service	Staff resource	Q3
		Improve joint working to prevent risk of homelessness for inclusion groups (e.g. GRT)	Public Health	HSP Regulatory Services PSH	Improved access to services	Staff resource	On-going
	4.1.3 Deliver and improve support to reduce rough sleeping	Review and update our Ending Rough Sleeping Plan	HSP Housing Solutions	DLUHC	Submission to DLUHC of the Ending Rough Sleeping Plan	Staff resource	Q1
		Ensure those leaving prison are supported to obtain accommodation and appropriate support through ongoing joint working with Prisons and Probation	Housing Solutions	Prison governors Probation Public Health	No of people homeless or rough sleeping on discharge	Staff resource	On-going
		Senior management strategic approach to working with Prisons to prevent homelessness on discharge and reduce repeat homelessness and re-offending	C & O Assistant Director	Prison governors Probation Public Health	No of people homeless or rough sleeping on discharge	Staff resource	Q2

		Ensure those leaving hospital are supported to obtain accommodation and appropriate support through ongoing joint working with hospitals	Housing Solutions	NGH Berrywood Local hospitals Public Health HSP	Duty to Refer statistics	Staff resource	On-going
		Ensure care leavers are supported to obtain accommodation and appropriate support through improved operational joint working and training	NCT ASC Housing Solutions	HSP	No of care leavers approaching as homeless	Staff resource	On-going
	4.1.4 Assess the impact and outcomes of the Rough Sleeping Initiative funded projects	Review progress and outcomes of RSI5 funded services and projects	HSP Housing solutions	DLUHC	Utilisation of grant funding	Staff resources	Q2
		Prepare for future RSI or equivalent funding cycle (link to 4.3.1)	HSP Housing solutions	ASC	Report	Staff resources	Q3
	4.1.5 Improve data collection and analysis across services to better understand outcomes (see also 1.1.8)	Improve monitoring of supported accommodation to reduce the prevalence of repeat homelessness arising where people are evicted	HSP Housing Solutions PSH	RPs Supported accommodation providers Revenues and Benefits	No. of homelessness approaches as a result of end of supported accommodation.	Staff resources	On-going
		Monitor the prevalence of placements by other local authorities within West Northants, of vulnerable people	Housing Solutions HSP	DLUHC	No. of rough sleepers new to area.	Housing Solutions staff time to monitor  Management time to raise and discuss with other LAs	On-going

<p><b>4.2</b></p> <p><b>Co-produce a joined-up pathway to support people with complex needs, who experience homelessness</b></p>	<p>4.2.1 Develop a framework of supported accommodation provision and housing related support</p> <p>4.2.2 Develop a coordinated and joined-up approach bringing together a range of partners to deliver personalised support to enable long term recovery</p> <p>4.2.3 Secure support and investment across a range of services (Housing, Health, Adult Social Care)</p> <p>4.2.4 Embed co-production with people with lived experiences into new service delivery (link to 1.2.4)</p>	<p>Deliver the Transformation programme for People with Complex Needs at risk of Homelessness</p> <p>(link to 1.1.3 ,1.1.8 and 1.1.9)</p>	<p>Joint Corporate leads Transformation Housing Solutions</p>	<p>ASC HSP Public Health Health NCT Supported accom providers RPs VCSE DLUHC Customers with lived experience Homeless Link</p>	<p>Outcome reports to transformation board</p>	<p>Staff resources Pooled budget</p>	<p>Q2</p>
<p><b>4.3</b></p> <p><b>Help people settle into homes where they can thrive</b></p>	<p>4.3.1 Develop and adopt housing-led principles throughout our support services, specialist housing provision and mainstream accommodation options.</p>	<p>Ensure the Health Needs Assessment of people who sleep rough research and recommendations inform the workstreams within the Transformation programme for People with Complex Needs at risk of Homelessness</p>	<p>Joint Corporate leads HSP Housing Solutions ASC Public Health</p>	<p>RPs Supported accommodation providers Key partners Customers with lived experience</p>	<p>Adoption of Housing-led principles</p>	<p>Funding needs to be sourced Staff resource</p>	<p>Q2</p>



		Develop a business case for a Housing First pilot	HSP Housing Solutions ASC	Customers with lived experience  RPs  Supported accommodation providers  Key partners  Complex needs and Homelessness pathway group	Business case	Staff resource  Budget	Q2
		Develop a business case programme of floating support that follows the individual for as long as they need it	HSP Housing Solutions ASC	RPs  Supported accommodation providers	Business case	Staff resource  Budget	Q2
		Develop an offer to ensure those who have experienced homelessness and rough sleeping can access services that help them rebuild meaningful lives.	HSP	Housing solutions ASC Housing Solutions Economic Dev Adult Learning Hope Centre DWP Sport & Leisure VCSE partners Together UK	Programme of offers	Staff resource	Q2
	4.3.2 Deliver targeted support and services for women at risk of and	Consolidate understanding of women's experience of chronic homelessness within West Northants	HSP DA and SV Co-ordinator PH Inclusion	Health Public Health Housing Solutions	Delivery of a workshop	Staff resources	Q2

	experiencing homelessness	Develop targeted recovery services for women with complex needs, at risk of and experiencing homelessness	HSP DA and SV Co-Ordinator Public Health	DA specialist services DA and SV Board Homeless Link	Business case	Staff resources Budget	Q3
	4.3.3 Improve access to rapid 'off-the-street' options for rough sleeping.	Link to 4.2.1 and 4.2.2	Joint Corporate leads HSP Housing Solutions	ASC Public Health	Outcome reports to transformation board	Staff resources	

**Abbreviation Key:**

HSP: Housing Strategy and Partnerships  
ASC: Adult Social Care  
CST: Community Safety Team  
PSH: Private Sector Housing  
PH: Public Health  
PSH: Private Sector Housing  
NPH: Northamptonshire Partnership Homes  
NCT: Northamptonshire Children's Trust  
SHPF: Supported Housing Provider Forum  
SHF: Single Homelessness Forum  
HPN: Homeless Prevention Network  
RP: Registered Providers  
GUHG: Grand Union Housing Group  
FHG: Futures Housing Group  
MECC: Make Every Contact Count  
CTP: Community Training Programme  
GRT: Gypsy, Roma and Traveller



# Homelessness and

# Rough Sleeping Strategy

**2024-2027**



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# Foreword

**Homelessness in the 21<sup>st</sup> Century is a tragic reflection of the fragility of society and the failures of the systems underpinning that society.**

It is our job as public servants to make those systems as robust, adaptable, and compassionate as possible to avoid the waste of potential, the erosion of dignity and the loss of life that homelessness and rough sleeping can give rise to. With that in mind we approach this task with the commitment and determination that it merits. We want to ensure people have access to good, safe housing which provides the foundation for accessing health and social care when they need it, the best education, securing employment and living their best life.

This strategy has been developed at a time of significant pressures and the cumulative impact of the COVID-19 pandemic, cost of living crisis, the national housing crisis and the current global situation. Unfortunately, this means many households continue to feel the pressures relating to increases in costs of living and the demand for affordable housing and housing-related support services continue to increase. We are committed to change this and believe by working with a variety of partners including health, the police, Registered Provider partners and the voluntary, community and faith sector we can achieve better outcomes for people affected by homelessness in West Northants.

This is our first Homelessness and Rough Sleeping Strategy as West Northamptonshire Council (WNC). We have included the views of colleagues, partners and customers on how collectively we can reduce homelessness and rough sleeping in West Northants. We believe that the themes and actions it sets out are long-term and flexible enough to address likely changes to legislation, guidance and social and economic shifts over its duration. This strategy outlines our commitment to tackle an issue which is complex and challenging. The delivery of this strategy will assist people who are some of the most vulnerable in our community.



Our new three-year strategy places strong emphasis on early intervention and ensuring we increase prevention of homelessness, reduce rough sleeping, reduce the number of households in temporary accommodation and provide more suitable and affordable accommodation for our diverse communities.

The strategy is framed around four themes:

- Improving collaboration & partnership working
- Early intervention and prevention of homelessness
- More suitable and affordable housing
- Reducing rough sleeping

We are determined to make homelessness in West Northants rare, brief and unrepeatable. With increasing demand, there is additional pressure on council services and the resources of our partners. However, by working together and making homelessness everyone's responsibility we will continue working towards ending homelessness in all its forms.

**Councillor Adam Brown,  
Deputy Leader of the Council & Cabinet  
Member for Housing, Culture & Leisure**

# Introduction

The Homelessness and Rough Sleeping Strategy 2024-2027 has been co-produced with a range of services across the council, external statutory partners, our arms-length management organisation (ALMO) who manage our council housing stock and key Registered Provider Partners and voluntary, community and faith sector organisations.

Partners supported this strategy, setting out the vision to work towards ending homelessness across West Northants. We will achieve this by:

- Taking a multi-agency collaborative partnership approach to effectively tackle homelessness and making homelessness everyone's responsibility
- A personalised approach to ensure that people receive the right advice and support at the right time to help them to find, or remain in, a safe and stable home
- Improving residents' experience of engaging with services and ensuring that every contact counts.

Homeless Link worked with staff from local accommodation providers, support services and people with lived experience of homelessness to find out what values mattered to them and how they are treated. The following values were identified:

- Honesty and trustworthiness
- Respect
- Empathy, kindness, and compassion
- Purpose in their work, was highly valued by staff working with people experiencing homelessness



Graphic: Created via workshop facilitated by Homeless Link, July 2023



# How we developed our strategy

We adopted a co-production approach to develop our Homelessness and Rough Sleeping Strategy and it was informed by:

- the findings of our strategic review of homelessness in West Northants
- discussions with various teams within the council including our ALMO and Northamptonshire Childrens Trust
- discussions with external statutory and non-statutory partners
- two independent pieces of commissioned research.

## Health Needs Assessment of people who experience rough sleeping

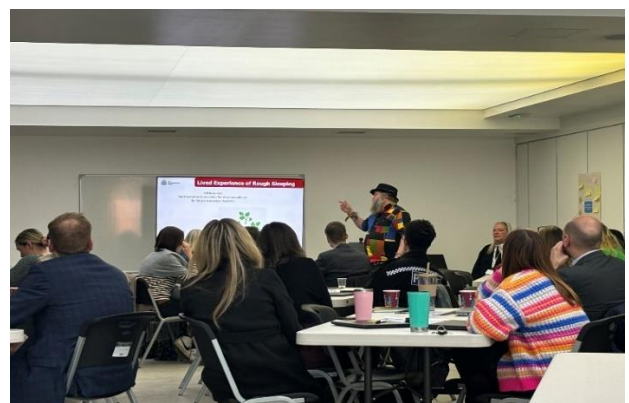
During 2023, the Council's Housing and Public Health teams commissioned an independent assessment of the health, social care, housing, and support needs of people at risk of or with experience of sleeping rough, within West Northamptonshire. A project group of over 20 key partner organisations, including those involved in supported accommodation and health service provision provided data and staff interviews. The research also included interviews with people with lived experience of homelessness and our local services, to establish their views and input. The research; reviewed the current customer journey, including existing accommodation and support; identified gaps in service provision; and made recommendations for future scale and type of service provision. This included new operating models and approaches to inform a new commissioning framework for supported accommodation and services for people in this cohort.

## Homelessness and Housing Solutions Health check

During 2023 we commissioned an internal 'service health check' of our Housing Solutions provision, which included mystery shopping of the access points to our service, staff interviews and case file reviews. This work informed our plans for an aggregated West Northamptonshire Housing Solutions Service, our Homelessness Transformation Project, and a programme of bespoke staff training.

## Events and engagement:

- **Single Homelessness Forum and Homelessness Prevention Network:** Our two established partnership networks fed into the review and strategy development and partner agencies provided data
- **Prevention of rough sleeping engagement event:** In conjunction with [Homeless Link](#), we held a half day event focused on prevention of rough sleeping, in July 2023. This was informed by a survey on values of those with lived experience of homelessness and of service providers, undertaken by Homeless Link in advance of the session
- **General needs homelessness prevention event (Jan 2024)**
- **Wider Determinants of Health Workshop:** In conjunction with Public Health, the health needs assessment was presented to a wide range of internal and external stakeholders at this workshop in August 2023 and further workshops took place in early 2024.



# National Context

This strategy and the evidence base that informs the themes and objectives were developed while our country experiences significant pressures and challenges, with the landscape of homelessness evolving quickly, shaped by cumulative impacts.

At a national level, significant challenges include:

- **Cost of living increases** – increased living costs have severely impacted household finances. This is a contributing factor in the increasing risk of homelessness and has created additional pressures for households who were already struggling.
- **Benefit and welfare reforms** – have had significant implications for housing and homelessness.
  - *Universal credit* – a single payment generally made direct to the applicant, which covers some or part of any housing costs. Benefit rates have not risen in line with market rental values, which may lead to rent arrears and can contribute towards the on-going costs of living crisis. For some households in temporary accommodation, the Local Housing Allowance (LHA) rates have been frozen at 2011 levels, exacerbating issues around affordability (although an uplift in LHA rates is due from April 2024)
  - *Single Accommodation room rate* – for people under 35, a single shared room rate applies. This restricts people to a very low rate to cover housing costs as well as putting homelessness services under pressure to find affordable shared properties for people to move on to
  - *Under-occupancy* – this reduced housing benefit entitlement to social housing tenants considered to be under-occupying their home.
- **Health inequalities** – the pandemic accentuated health inequalities arising from lack of warm, safe homes with adequate space; access to healthy outdoor space; safe workplaces and schools. Nationally, this increased awareness of the negative impacts on those

who lack one or more of the 'key determinants of health'.

- **Resettlement Schemes** – including the emergency resettlement of Afghan nationals; the refugee crisis following Russia's invasion of Ukraine.
- **Unaffordable local housing market** – lack of affordable housing and an expensive private rented sector.

Headline measures for homelessness and rough sleeping in 2022-23 for England were:

- **Homelessness Assessments** – just under 300,000 households were assessed as threatened with homelessness or already homeless (up 6.8% from 2021/22 and 3% above the pre-covid level in 2019/20)
- **Temporary Accommodation** – there was a 10% increase in the number of households in temporary accommodation
- **Rough Sleeping** – 3,069 people were included in the annual single-night count of people sleeping rough in November 2022 – an increase of 26% on 2021

Other national changes in 2022-23 compared to 2021-22 included:

- a decrease in successful outcomes to prevent and relieve homelessness
- increases in number of households owed a homelessness duty due to the end of an assured shorthold tenancy. Large increases were seen in the number of assured shorthold tenancies ending as landlords wished to sell or re-let their property.
- an increase in households owed a prevention or relief duty where the main applicant was aged 65-74 years old
- an increase in the number of households owed a prevention or relief duty where the main applicant was in full-time (up 10.8%) or part-time work (up 6.5%).



# Vision and Values

West Northamptonshire Council's [Corporate Plan 2021-2025](#) sets out its vision for making West Northants a great place to live, work, visit and thrive, where there is opportunity for all. Its priorities include:

- **Green and Clean** - only contract with partners that are socially responsible
- **Improved Life Chances** –we have a Care Leavers Charter in place; nobody is forced to sleep rough locally; we have an Anti-Poverty strategy to get people back on their feet and avoid crisis
- **Connected Communities** -including improving rural connectivity
- **Thriving Villages & Towns** – partner with local voluntary, community and social enterprise sector organisations to enable communities to support themselves and co-design the public services they need, to increase inclusiveness and community cohesion, and reduce loneliness and isolation; build 500 new council homes
- **Economic Development** -drive the economic development and recovery from the pandemic as a key priority
- **Robust Resource Management** including open and transparent decision making and financial prudence underpinning long term decisions and plans.

The West Northamptonshire [Joint Health and Wellbeing Strategy 2023-2028](#) focuses on helping residents to 'Live Your Best Life'. This is a joint strategy working with a variety of partners including health, voluntary and community sector organisations, police and fire colleagues. The strategy focuses on tackling health inequalities throughout West Northamptonshire by looking at 'wider determinants', which are external elements that can affect a person's health and wellbeing. Over the next five years, the aim is to achieve the 10 ambitions outlined in the strategy through work at a very local level via West Northamptonshire's nine [Local Area](#)

## THRIVE

### Our Core Values

#### TRUST

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



#### HIGH PERFORMANCE

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



#### RESPECT

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



#### INNOVATE

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



#### VALUE

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



#### EMPOWER

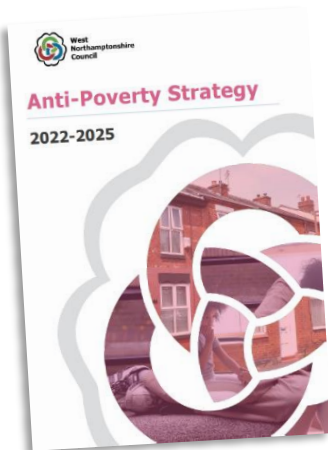
We believe in people, will listen, learn and trust them to make decisions. We help people to realise their ambitions.



[Partnerships](#) (LAPS). The 10 ambitions and some of the key outcomes relevant to homelessness are outlined below:

Ambition	Key outcomes
The best start in life	<ul style="list-style-type: none"> <li>• Women are healthy and well during and after pregnancy</li> <li>• Children are healthy from birth</li> <li>• All children grow and develop well so they are ready and equipped to start school</li> <li>• Children in care are healthy, well and ready for adulthood.</li> </ul>
Access to the best available education and learning	<ul style="list-style-type: none"> <li>• Nobody misses out on learning</li> <li>• Adults have access to learning opportunities which support employment and life skills.</li> </ul>
Opportunity to be fit, well and independent	<ul style="list-style-type: none"> <li>• Adults are healthy and active and enjoy good mental health</li> </ul>
Employment that keeps you and your family out of poverty	<ul style="list-style-type: none"> <li>• More adults are employed and receive a 'living wage'</li> <li>• Households take up benefits they are entitled to</li> </ul>
Good Housing in places which are clean and green	<ul style="list-style-type: none"> <li>• Good access to affordable, safe, quality, accommodation and security of tenure</li> </ul>
Safe in your homes and when out and about	<ul style="list-style-type: none"> <li>• People are safe in their homes, on public transport and in public places.</li> <li>• Children and young people are safe and protected from harm</li> </ul>
Connected to friends and family	<ul style="list-style-type: none"> <li>• People feel well connected to family, friends, and their community</li> <li>• Improved outcomes for those who are socially excluded.</li> </ul>
The chance of a fresh start when things go wrong	<ul style="list-style-type: none"> <li>• People experiencing homelessness and the criminal justice service are helped back into society.</li> <li>• People have good access to support for addictive behaviour and take it up</li> </ul>
Access to health and social care when you need it	<ul style="list-style-type: none"> <li>• Timely access to all health and social care services when it is required, through life course from conception to end of life</li> <li>• People are supported to live at places of their residence and only spend time in hospital to meet medical needs</li> <li>• Services to prevent illness (health screening and vaccinations) are easy to access with quality provision</li> </ul>
Accepted and valued for who you are	<ul style="list-style-type: none"> <li>• People feel they are a valued part of their community and are not isolated or lonely.</li> <li>• People are treated with dignity and respect.</li> </ul>

# Local Context



West Northamptonshire Council's [Anti-Poverty Strategy](#) sets out how we will work with partners to support people struggling financially, what we will do to stop people falling into poverty and how we will work to influence the Government and other national organisations to

get the best deal for the people of West Northants. The strategy includes an objective to 'Meet housing need with good quality social housing and enable the private rented sector to be an effective housing contributor'. It commits to:

- Develop a new West Northants Housing Strategy.
- Support the development of new homes and ensure rent levels support local housing needs
- Develop a new West Northants Homelessness and Rough Sleeping Strategy.
- Help to prevent and reduce homelessness by seeking alternative housing options and increasing the number of good quality private sector homes available to rent.

[The West Northants Housing Strategy \(2022-2025\)](#) is a high-level document, which forms one of the cornerstones for delivering our Corporate Plan. It sets out the main housing related issues across West Northants and how we will deliver the housing priorities based around the following themes:

1. Deliver Homes people need and can afford
2. Improve the quality, standard and safety of homes and housing services
3. Support residents to live healthy, safe and independent and active lives
4. Support thriving and sustainable communities.

Partnership working underpins the strategy. Without this, we will not be able to tackle the big challenges that lie ahead.

This is West Northamptonshire Council's (WNC) first Homelessness and Rough Sleeping strategy, to cover the three years to 2027. Prior to the formation of WNC as a unitary authority, in April 2021, the legacy authorities of Northampton Borough Council, South Northants Council and Daventry District Council each had their own homelessness and rough sleeping strategies, with related action plans. All three had similar priorities for homelessness prevention, though with different locality-based challenges and levels of need for services.



# Key Achievements

Since our legacy authorities' strategies were produced, we have achieved positive results through partnership working and funding initiatives, despite global, national, and local challenges. These include:

- Delivering the Everyone In programme, to accommodate safely, people experiencing or at risk of rough sleeping, during the Covid-19 pandemic. Embedding effective new working practices following our learning during this period, and improving outcomes for those affected.
- In conjunction with Public Health, ensured access to the Covid-19 vaccination and screening for blood borne viruses, for those accommodated in winter shelter and supported provision. This addressed some health inequalities for those most vulnerably housed.

***'The [Single Homeless Service] successfully housed one of our Hep[atitis] C patients and assisted us in getting him a secure location and on to treatment, none of which would have been possible without [their] support. This really is lifesaving. This individual has since been given the 'all clear' from Hepatitis C, following successful completion of treatment'.***

## **NHS Hepatitis C, Community Engagement Lead**

- Securing funding from the government's Rough Sleeping Initiative Round 5 (RSI 5) for 2022-25, to support people at risk of rough sleeping
- Establishing, with Public Health, the multi-agency, peripatetic, Northampton Homeless Treatment Team (NHTT), in conjunction with [CGL](#), [Bridge](#) and the [Hope Centre](#) for people with drug and alcohol dependency who sleep rough or are at risk
- Purchased and set up 35 properties, with tenancy support under [NSAP/RSAP](#) 1 and 2 funding, including three with additional support for women who have experience of sexual and financial exploitation

- Led a partnership approach to establish the Accommodation for Ex-Offenders (AfeO) project, which provides private rented accommodation for up to two years following release from prison. Accommodated 40 people by the end of March 2023. Secured funding for 60 further ex-offenders during 2023-25



- Co-designed and delivered with Adult Social Care, Multiple Exclusion Homelessness (MEH) training following the [Jonathan 19 Safeguarding Adults Review](#)
- Commissioned Midland Heart to deliver housing related and supported accommodation at [Oasis House](#), as part of our single homeless pathway
- Developed and adopted the [Housing Strategy 2022-25](#)
- Adopted a new WNC Housing Allocations scheme
- Provided wrap around resettlement support for over 800 arrivals under Homes for Ukraine and over 500 individuals under programmes for Afghan nationals
- Obtained Local Authority Housing Funding (LAHF), to support settled accommodation for Afghan and Ukrainian individuals and families.



# Main findings of our homelessness review

**Homelessness approaches:** Almost 5,000 homelessness approaches (4951) were made to the Housing Options Service in 2022/23. An increase of 14% (599 additional approaches) on the previous year.

**Main duty acceptances:** we made 483 main duty homelessness acceptances in 2022/23, increasing from 321 in 2021/22.



## Reasons for loss of last settled home

In common with the national trend in reasons for loss of last settled home for households approaching as homeless, our main reasons are:

- Being asked to leave by family and friends
- End of an assured short-hold tenancy
- Domestic abuse.

West Northants has a higher than national average rate of people approaching as homeless after 'End of supported housing'.

**Repeat approaches:** Almost half of customers who approached during 2022/23 had made one or more previous approaches in the five years prior.

**Single person applicants and couples without children** comprise almost half of the households in temporary accommodation.

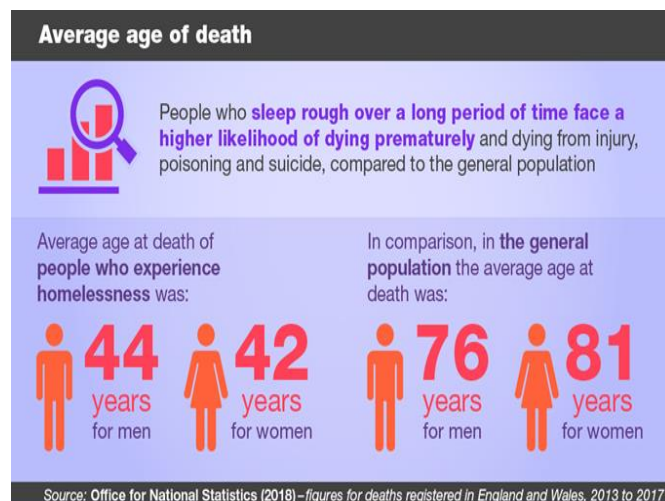
## Number of people sleeping rough

We compile several different measures for central government to indicate the prevalence of people sleeping rough in our area. Each provides a 'snapshot' in time, rather than definitive figure, as many people move in and out of homelessness and rough sleeping at different points:

- 15 people were recorded as sleeping rough on a single night in June 2023 with 45 people recorded as having slept rough across that month.
- Our annual rough sleeping estimate and count recorded 36 people sleeping rough on a single night in November 2023. This rose from 25 people in 2022 and 15 people in 2021.
- We have an identified 'target priority group' of 100 people who have been seen sleeping rough in two or more of the last three years, or in two or more of the last 12 months.

West Northants was identified by DLUHC as a target authority area for funding, for the cohort 'Adults with a history of rough sleeping who have a high level of support need'.

Nationally, people who experience homelessness generally have much poorer health, and are more likely to die earlier, and to die from injury, poisoning or suicide, than the general population. Many of these deaths are likely to be preventable through better access to health care and housing.



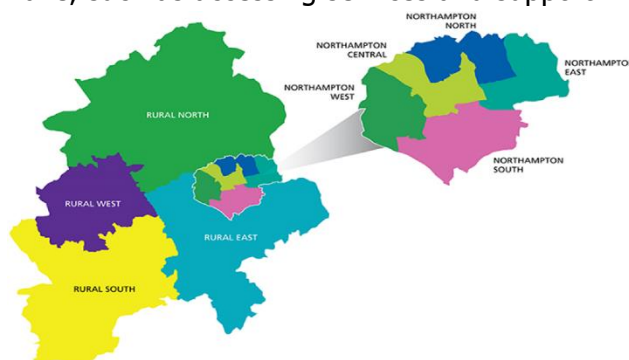
# Theme 1: Improve collaborative partnerships to make homelessness everyone's business

The causes of homelessness and rough sleeping are multiple and complex and not all are housing related, therefore no one organisation can tackle the systemic challenges alone. By working together across services and sectors we can achieve better outcomes for all who are affected by homelessness and rough sleeping. The statutory homelessness responsibilities on local authorities, high dependence on short-term government grants and continuing pressures on local government finances, make a collaborative, innovative approach critical.

## Why this is important

- The government's [Ending Rough Sleeping for Good strategy](#) expects to see a whole system approach locally, building on the excellent partnership working during the pandemic. This approach is applicable to the prevention of all forms of homelessness, not just rough sleeping
- The [Northants Integrated Care Strategy](#) and the West Northants Health and Wellbeing Board Strategy 2023-28 provide opportunities to collaborate on developing services
- The West Northants Housing Partnership Board (HPB) was set up to facilitate collaborative solutions, embed a partnership approach and unite people from different sectors to co-produce solutions. The HPB will drive the delivery of partnership actions in our Housing and Homelessness strategies

- Collective action is required to effectively tackle homelessness, rough sleeping and reduce health inequalities. We can improve services and interventions that support people when they are most in need and deliver better outcomes for them
- Stronger partnerships create better opportunities for of delivering services that meet people's needs, improving their experience and outcomes
- Around half of all homelessness approaches originate within three of our [Local Area Partnerships \(LAPS\)](#), within the urban area of Northampton. We also appreciate the different challenges residents in our rural areas can have, such as accessing services and support



- Data is essential and a powerful tool for developing strategies, monitoring progress against action plans, designing service provision and intervention, commissioning services and evaluating what does and does not work. Although much data is collected currently, there is a lack of consistency across services in how it is collected, monitored, or used to evidence what works well or to identify gaps in services
- We are experiencing an increase in the level of homelessness and rough sleeping locally. Our statutory homelessness responsibilities, high dependence on short-term government grants and continuing pressures on local government finances, makes taking a collaborative, innovative approach vital

- During the pandemic, existing relationships and partnership were the foundations for quick and effective partnership working around homelessness in a time of crisis. The pandemic raised the profile of homelessness and required greater working with Public Health. As a result of this, there is a wider understanding on the issues around homelessness and rough sleeping and greater collaboration
- Domestic abuse remains a significant cause of homelessness locally, causing long term harm, trauma and disruption to individuals and families. The implementation of our Domestic abuse strategy supports collaboration across the authority, with specialist providers, RPs, the Police and other statutory partners to improve access to Safe Accommodation and facilitate long term safety for victim survivors including children



- There are many examples where collaborative working across key services and partners are achieving better outcomes for people affected by homelessness and rough sleeping:
  - Co-location of adult social care and Housing teams, has highlighted successful outcomes in the prevention of homelessness and improvement of living conditions for people experiencing issues such as hoarding and self-neglect
  - Housing and Public Health jointly commissioned a comprehensive independent assessment of the health and wider needs of people who experience or

are at risk of rough sleeping. This work will inform improvements to housing provision and access to health services, as too many of our vulnerable residents end up repeatedly seeking urgent health care interventions or experience significant risk to life, exacerbated by poor living conditions

- The creation of a Homelessness Mental Health Practitioner post, in 2021 improved access to mental health services and support, working closely with Northamptonshire Homeless Treatment Team (NHTT) to provide support on a dual diagnosis basis
- Work with Public Health to establish the multi-agency, peripatetic, Northampton Homeless Treatment Team (NHTT), in conjunction with specialist local service providers, for people with drug and alcohol dependency, who sleep rough or are at risk, funded through Rough Sleeping Drug and Alcohol Treatment Grant (RSDATG)



- Housing and NCT implemented a joint protocol, mandatory staff training and audit framework for 16 to 17 year olds at risk of homelessness. Joint working continues to develop a needs analysis and development opportunities for young people leaving care. This includes supporting NCT's Staying Close Project, which aims to provide independent accommodation for young people leaving care.



## What people told us

- Work with partners to improve access to services and information and awareness of the support available
- Explore options to join up data on customers to reduce people telling their 'story' multiple time
- Co-location of staff from across different services improves collaboration and outcomes
- Support care leavers transitioning from care into independent living
- Early intervention is required to identify emerging issues
- The importance of identifying training needs across services and partners and ensure joint training opportunities are made available
- Concern over the short-term commissioning and being able to deliver good quality provision and lasting outcomes
- Need to ensure commissioned service meet the needs of individuals and are accessible to people
- Lack of appropriate data sharing between key organisations involved in a person's case remains a barrier to providing responsive and effective services. Current practices require people to re-count difficult experiences repeatedly.



## What we will do

### 1.1 Strengthen collaborative working

We will do this by working with a wide range of partners and organisations through:

- Providing strong governance and delivery of partnership projects through the Housing Partnership Board, task and finish groups and our local partnership forums and networks to harness the resources of all partners to respond to homelessness
- Delivering a collaborative multi-agency homelessness approach that facilitates early interventions to ensure pathways to housing and support reduce homelessness and rough sleeping
- Exploring opportunities to work with other services within the council and external



strategic partners for joint-commissioning opportunities to improve & enhance the delivery of a range of homelessness services

- Work with local communities and Local Area Partnerships to understand the barriers to accessing services so we can improve access to support for specific communities and localities
- The delivery of joint training, education and learning opportunities to share knowledge and experience and to understand each other's business to enable better coordination and collaboration
- Raising awareness of homelessness support and services available for people with local community and voluntary sector organisations so they know where to signpost individuals looking for support
- Strengthening relationships with Registered Providers (RPs) who have a strong presence across the area and who deliver good quality housing, to improve sustainable move on options



- Improve data collection, monitoring and use of intelligence across WNC and relevant partners to evidence what works and where gaps in needs and services remain
- Secure support and investment across a range of council services and external partners to break down silos and pool resources to use resources more effectively to maximise the support available.

## 1.2 Embedding a person-centered approach

We will do this by working with a wide range of partners and organisations through:

Improving coordination and integration of support services around individuals and families to minimise the need for people to repeat information about traumatic experiences

- Ensuring the whole person is 'Seen and Heard' through the establishment of specialist multi-disciplinary and co-located teams, will including Adult Social Care, Housing, Northants Children's Trust (NCT), Public Health, the Police, Drug and alcohol service and the VCS so there is a holistic approach
- Understand trauma informed approaches to develop service provision that supports better outcomes for customers.
- Working with partners to identify how those with lived experience of homelessness, including rough sleeping can be included in the design and delivery of services.



## Theme 2: Early intervention and prevention of homelessness

Homelessness in any form is disruptive to a person's sense of wellbeing, safety, and security.

Early help and prevention will reduce the impact of homelessness on a household, reflected in the lesser complexity of intervention required at an earlier stage, than if circumstances were to escalate and reach crisis.

Solutions need to be cross-cutting, with a council-wide, collaborative approach. All services will work hard to prevent homelessness from occurring and assist people to stay in their homes or support them to move to other settled accommodation.

### Why this is important

- Too many households do not get the advice or help they need at a time when homelessness could be avoided. Accessing accurate information, advice and help can avoid problems escalating and provide time for alternative housing to be found before a crisis arises
- We are potentially missing opportunities to prevent homelessness. In 2022/23, our rate of dealing with homelessness cases at prevention duty stage (42%) was lower than the regional average (50%)
- In 2022/23 we are dealing with a greater proportion of households at the relief duty stage locally (58%) compared to the regional average (50%). This means people are approaching us for help when the chance of preventing homelessness has passed

- Public authorities have a Duty to Refer (DtR) people engaged with their services who may be homeless or at risk of homelessness to the Council, where they have consent to do so.
- We have trained partners to use the Duty to Refer and have high rates of referrals from Probation, our hospitals, and Northants Childrens' Trust (NCT)
- Registered providers are not legally covered by the Duty to Refer, but we work with local housing providers to use this easy method of referral, under the [Commitment to Refer](#)
- Almost half of customers who have approached the service for assistance have made one or more approaches in the previous five years. This is most prevalent amongst single people, but also households with dependent children
- Debt and money advice services are vital to homelessness prevention. Our in-house and commissioned services are in the process of restructuring to ensure consistent provision. All have seen increases in demand, exacerbated by the cost-of-living crisis, which has impacted services capacity. All services contribute to homelessness prevention, but data is not currently systematically recorded



- We support people to access available funds to retain their current home or to move in a

timely fashion. We are developing a Homelessness Prevention Scheme to ensure residents have fair access to grants, loans and other financial and practical assistance wherever they live within West Northants

- Domestic abuse remains one of the four top reasons for homelessness approaches. We have a higher than average prevalence of domestic abuse cases being re-referred to multi-agency risk assessment conferences (MARACs), indicating that serious risks of domestic abuse are not being tackled or ameliorated. Domestic abuse is a driver of homelessness and repeat homelessness locally

## What people told us



- Too many people find it difficult to access information, advice and support from WNC services at the time and place they need it. This becomes more difficult where people have complex needs
- We need to respond quickly and consistently when referrals are made to us by partner agencies, to embed positive working practices
- Quality services are currently delivered by our Money Advice Service, and voluntary sector partners, but these are not accessible in all parts of West Northants
- We have a number of financial and other 'tools' to prevent homelessness however we need to ensure that these are used

consistently, and clear outcomes and achievements are recorded

- Making people recount difficult experiences over again creates barriers to accessing help and can negatively impact on wellbeing or recovery. This is especially the case when people have experienced trauma, such as domestic abuse, bereavement, or family breakdown
- Partners working with those experiencing financial difficulties, including many people in work, have noted a continued escalation in demand and complexity of need for their services.

## What we will do

### 2.1 Increase our early intervention services

We will do this by delivering, with a wide range of organisations and partners:

- accessible, high quality, up-to-date information and guidance, to help residents address their housing difficulties when these first arise
- a programme of awareness raising initiatives across community settings, including schools on tackling issues that may result in homelessness
- improved collection and analysis of data to identify households at risk of homelessness and inform service delivery





## 2.2 Provide effective homelessness prevention services

We will do this by developing and delivering services that:

- Ensure that residents can access the right service from the right organisation at the right time
- Strengthen consistent provision, access to and promotion of housing, debt and money advice services across West Northants
- Encourage housing providers to identify and assist households at risk of homelessness at the earliest point possible
- Support all statutory partner agencies to use the Duty to Refer and Commitment to Refer to alert Housing Solutions team of households at risk of homelessness to enable us to respond at the earliest opportunity
- Develop a range of effective financial and other interventions and assistance to prevent homelessness
- Ensure our West Northants Housing Allocations Scheme is effective in preventing homelessness through access to settled homes

## 2.3 Reduce the instances of people facing repeated homelessness

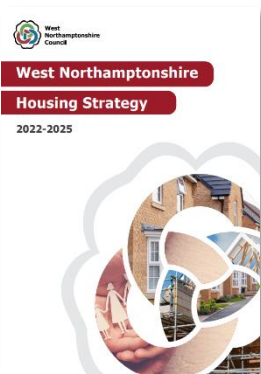
We will do this by delivering, with a wide range of organisations and partners, services that:

- Support households to make timely and accurate claims for financial support with their housing costs to create sustainable tenancies and avoid arrears
- Ensure that people experiencing domestic abuse have appropriate support to remain in safe, settled accommodation, avoiding need for repeated moves
- Develop residents' skills and strengths to support them to build confidence and develop resilience and self sufficiency
- Identify and provide appropriate targeted support for people with more complex needs to help sustain tenancies.



# Theme 3: Increase provision and access to suitable and sustainable settled housing solutions

The Council's [Housing Strategy \(2022-2025\)](#)



focuses on opportunities to improve and maximise the delivery of new affordable housing.

The delivery of a range of affordable housing options in the right locations is an important factor in supporting the prevention of

homelessness in helping to meet housing need and the provision of longer-term sustainable settled housing solutions.

## Why this is important

- There has been an increase in the number of households in temporary accommodation. In January 2024, there were just under 700 households in temporary accommodation, increasing from 600 households in June 2023. We have a legal duty to provide temporary accommodation to households who approach us for assistance, who we have reason to believe may be homeless, in priority need and eligible for assistance
- As of June 2023, 65% of households had spent under six months in temporary accommodation, however there were 50 households who had stayed in temporary accommodation for longer than 12 months
- An increase in temporary accommodation costs and an increase in demand has seen significant costs on council budgets
- The most cost-effective provision is council owned accommodation, however currently our largest provision of temporary accommodation is nightly-let which is the most expensive
- Single households and couples without dependents have made up 50% of households in temporary accommodation
- There are approximately 4000 households on the Council's housing register
- 1268 new affordable homes have been developed since April 2021. However, new affordable supply is impacted on the number of properties lost through Right to Buy
- Discharge of main homelessness duty into the PRS has been very low, this is a result of limited engagement with private landlords and very high local rent levels.
- Our temporary accommodation acquisitions project has purchased eight properties, with a further eight properties proceeding through conveyancing. This additional provision will provide more council owned properties for use as temporary accommodation, rather than the more costly nightly-lets.
- [Local Housing Allowance](#) in the private rented sector does not cover the full rent within West Northants resulting in rent shortfalls and affordability difficulties for households
- Effective licensing and regulation of the local private rented sector has resulted in the council issuing £50,000 worth of financial penalties to 15 landlords operating 13 private rented properties, for non-compliance with the Housing Act 2004. We have also taken enforcement action against 10 landlords

operating 18 unlicensed houses in multiple occupation, resulting in fines and contributions to court costs in excess of £400,000.

## What people told us

- Effective tenancy support for those placed in temporary accommodation ensures that households understand the steps they need to take while experiencing homelessness, and are supported to move-on and sustain new settled homes
- Some residents struggle to afford homes let at affordable rent levels
- We need more homes at social rent levels
- The council should use its enforcement powers against private landlords with substandard properties and poor management practices
- There needs to be a comprehensive 'offer' to private rented landlords to increase access to the sector and support tenants in private rented homes when required
- The council should explore options for increasing the supply of good quality, affordable private rented accommodation.

## What we will do

### 3.1 Increase the supply of new affordable housing

#### We will do this by:

- Developing a council-led affordable homes development programme to increase the number of council homes
- Strengthening our partnerships with registered providers to increase the supply of new social rented homes that are genuinely affordable, and look at options to increase the level of homes let at a social rent level
- Exploring the provision of modular homes and investigate innovative ways of providing

accommodation to prevent and relieve homelessness

- Utilising and making best use of Council land assets and resources

### 3.2 Reduce the number of households in and the cost of temporary accommodation

#### We will do this by:

- Ensuring value for money in the procurement of temporary accommodation
- Reducing the number of households needing temporary accommodation through effective, and early prevention tools
- Ensuring that we have a sufficient supply of affordable temporary accommodation to meet demand and is of the right type, quality and in right location and better meets the needs of homeless households
- Providing effective support and advice to households living in temporary accommodation, to develop a personalised move-on plan to understand their housing options to enable them to move onto settled, sustainable homes as quickly as possible
- Increasing the supply of Council owned temporary accommodation by continuing to deliver the temporary accommodation acquisition programme.

### 3.3 Improve access to good quality, affordable private rented accommodation

#### We will do this by:

- Utilising our full range of statutory powers to tackle substandard private rented properties.
- Improving the support and incentives available to the private rented sector into a single 'offer' for landlords

## Theme 4: Ensure that where rough sleeping occurs, it is rare, brief and non-recurring

Rough Sleeping is the most visible form of homelessness and can negatively impact on an individuals' health and wellbeing. Many people with prolonged or repeat experiences of rough sleeping face a range of complex health and social issues. Support tailored to the needs of the individual can secure better outcomes, improve health and wellbeing and support recovery and avoid repeated homelessness.



### Why this is important

- Experience of rough sleeping impacts negatively on health outcomes and increases the risk of early mortality. Nationally, the average age of death for women is 81 years compared to women who experience homelessness, which is 42 years. The average age of death for men is 76 years compared to men who experience homelessness, which is 44 years. Those who sleep rough over a longer period face a higher risk of dying prematurely and dying from injury, poisoning or suicide than the general population.
- We have an identified 'target priority group' of around 100 people in West Northants who

have been seen sleeping rough in two or more years out of the last three, or in two or more months out of the last 12. We verified 36 people in our annual rough sleeping estimate data, as sleeping rough on one 'typical' night in November 2023.

- Data shows that some people who experience rough sleeping make significant numbers of approaches to housing and emergency health care provision. This increases the crisis demand for those services, without individuals getting the help they need to resolve their situation. Among individuals making repeat homelessness approaches over the last five years, those making the highest number of repeat approaches were single people with a history of rough sleeping, mental health and drug dependency issues. This indicates that current service delivery models do not resolve these people's issues.
- The 'Health and housing needs of people experiencing rough sleeping' research recommended improvements across housing, health, and social care provision, to significantly improve outcomes for individuals, increase effectiveness of service provision and improve value for money.
- Most current supported housing provision is designed to be short term with an expected linear progression. However, local provision has only assisted a minority (8%) of people out of homelessness and into settled homes. It does not function as a 'coherent and effective response system', or sustainably end people's homelessness. People are staying in supported accommodation for far longer than services are designed for.
- It is currently far too difficult for people who have experienced homelessness to access private rented homes as settled move-on. Social housing has been almost the sole move-on route from supported housing, but there is a lack of supply, which can mean long



waiting times. The lack of alternatives reduces housing choices for those who have experienced rough sleeping.

- The 'Health and housing needs of people experiencing rough sleeping' research identified provision for individuals requiring high intensity support as a key area of unmet need.
- People newly experiencing rough sleeping need rapid interventions, with advice and support. Each night someone spends without safe accommodation will be detrimental to their health and wellbeing and is likely to require additional resource to help with recovery.
- Most current services are structured so that support ends when the person moves on. This can impede development of trust with key services and impede recovery for people who have experienced trauma and deprivation. It can limit the effectiveness of services.
- [Northamptonshire Safeguarding Adults Board \(NSAB\)](#) commissioned a [Safeguarding Adults Review \(SAR\)](#) following the death of a 46-year-old man called Jonathan in December 2019. There were concerns about how local agencies worked together to safeguard Jonathan. The SAR recommended improvements to ensure that agencies 'see the person and not just the problems' as key to securing better wellbeing outcomes for homeless adults with complex needs. This includes developing a greater understanding of the needs of those experiencing 'Multiple Exclusion Homeless' which includes trauma and deep social exclusion.
- The Government's 'Everyone In' response at the start of the pandemic ensured that people sleeping rough and in accommodation, where it was difficult to self-isolate, were safely accommodated to protect them, and the wider public, from the risks of the virus. This

collaborative way of working facilitated a greater understanding of those accommodated, resulting in a more holistic, tailored approach to meet individual needs. This has improved operational partnership working across all sectors.

- The [Kerlake Commission](#) notes that homelessness is experienced differently by women, who face an additional burden of gender-based harassment, abuse and violence. Women who experience homelessness also tend to have more severe and complex interrelated needs which can make recovery exceptionally difficult.
- Our Joint Health and Wellbeing Board Strategy 2023 -27 commits to addressing health inequalities though improving access to health and wider services for vulnerable groups.

People have **experienced Multiple Exclusion Homelessness (MEH)** if they have been 'homeless' (including temporary or unsuitable accommodation as well as sleeping rough) and have also experienced one or more of the following other 'domains' of deep social exclusion:

- 'institutional care' (prison, local authority care, mental health hospitals or wards)
- 'substance misuse'
- participation in 'street culture activities' (begging, street drinking, 'survival' shoplifting and selling survival sex).

[Fitzpatrick, et al \(2011\)](#)

## What people told us

- We provide effective responses when services are delivered in a truly joined up, multi-agency way. Positive examples are improved joint working with partner agencies, including multi-agency working with peripatetic drug and alcohol services (Northants Homeless



Treatment Team (NHTT)) and the design and delivery of Multiple Exclusion Homelessness training programme, in conjunction with Adult Social Care

- Our established and experienced Street Services Team provide a responsive service and enable a good flow through our Housing Panel into accommodation with partner organisations. This team have strong relationships with both statutory, faith and community services, providing quality management of, and support to, a cohort of people with complex needs and often challenging behaviour
- Fully funded care packages for very vulnerable individuals were secured through seconding an Approved Mental Health Practitioner Social Worker into our Winter Shelter provision during 2022/23



- More multi-disciplinary services are needed to address the range of needs experienced by an individual or household in crisis
- Accessing services outside of standard working hours is very difficult for many people, including those in our rural areas. Being able to access an outreach service 'out of office hours' makes a real difference to people in crisis and to other professionals working to support them
- A comprehensive programme of training is vital, to better understand the impact of

trauma, addiction and multiple exclusion homelessness on individuals needing to access our services. There is a sense that we respond to the needs of services, not service users

- We need to better address the experiences of women and others locally, who experience overlapping homelessness, domestic abuse, sexual violence and forms of exploitation, often repeatedly. Current service provision often inhibits us from understanding and responding to the needs of very marginalised groups
- At present, most support available to people experiencing rough sleeping is short term and tied to specific accommodation interventions. This means that people experience repeated disruption and disjointed interventions, and are forced to re-live their traumatic experiences, which are not conducive to their recovery
- Access to mental health services, dentistry and some primary care services is almost impossible for too many people who experience homelessness and have complex needs
- There is concern that some very vulnerable people are placed in West Northants by other authorities, but stay in our area, without services being made aware of them, or adequate accommodation or support if the placement breaks down
- Although the majority of those who experience rough sleeping do so within Northampton town, rough sleeping also occurs in our rural towns and villages. When this happens, it can be even more difficult for people to access the support and services they need. Concentration of services in Northampton tends to 'pull' people to that area.

## What we will do

### 4.1 Reduce rough sleeping

- Implement recommendations of safeguarding adult reviews to improve service delivery and design
- Embed an understanding of Multiple Exclusion Homelessness throughout the sector
- Deliver and improve support to reduce rough sleeping using the funding awarded to West Northants and enhance services
- Assess the impact and outcomes of the rough sleeping initiatives funded projects, to enable us to develop business cases to secure future funding for essential services
- Improve data collection and analysis across services to better understand outcomes

### 4.2 Co-produce a joined-up pathway which supports people with complex needs who experience homelessness

- Develop a framework of supported accommodation provision and housing related support based on the recommendations of the 'Health and Housing needs of rough sleepers' report
- Develop a coordinated and joined-up approach bringing together a range of partners to deliver personalised support to enable long term recovery
- Secure support and investment across a range of services (Housing, Health, Adult Social Care) by breaking down silos and pooling resources where appropriate
- Embed co-production with people with lived experiences into new service delivery

### 4.3 Help people settle into homes where they can thrive

- Develop and adopt housing-led principles throughout our support services, specialist

housing provision and mainstream accommodation options

- Increase our understanding of needs and experiences and deliver targeted support and services for women at risk of and experiencing homelessness
- Improve access to rapid 'off-the-street' options for rough sleeping.

***Housing First** provides a stable, independent home and intensive personalised support and case management to homeless people with multiple and complex needs. There are no conditions around 'housing readiness' before providing someone with a home; secure housing is seen as a stable platform from which other issues can be addressed.*

***Housing-led or Rapid Rehousing** approaches get someone into their own home as quickly as possible, providing them with the support they need to make it work. This minimises the time spent in temporary accommodation and the number of moves someone makes before they move into a permanent home. Housing First is one form of Housing-led solution to homelessness, which supports people with the most complex needs. Housing-led is a whole system approach.*



# How our strategy will be delivered

In order to deliver the priorities that we have set out in this strategy we need to continue to work closely with our key partners. Tackling homelessness in an everchanging landscape, will continue to bring new challenges.

This is a three-year strategy (2024-2027). However, we will develop a dynamic 12-month Delivery Plan, to be monitored and reviewed annually, ensuring its actions are flexible and resilient.

## Governance

The Housing Partnership Board (HPB) will be a catalyst for strong strategic governance and leadership and the delivery of this Strategy.

Four steering groups aligned to the themes of our [Housing Strategy](#) will undertake the practical activities needed to achieve our priorities. Membership is senior operational or senior technical expert level and includes representatives from Adult Social Care, NCT, Public Health, our main Registered Providers, and our Assets and Planning teams. Theme 3 covers Homelessness and Rough Sleeping. Task and Finish groups will be set up to support delivery.

We have established partnership groups comprising the Homelessness Prevention Network in our rural areas and the Single Homelessness Forum in Northampton, which will feed into the HPB.

## Our workforce

Across West Northants organisations and services, rely on a dedicated, experienced workforce to deliver services to people experiencing or at risk of homelessness. This can be rewarding, but challenging work. Those supporting people with complex needs or in complex areas of law have accrued skills and knowledge over several years. Many organisations are experiencing difficulties with staff recruitment and retention, exacerbated

post-Covid and by the cost of living crisis. Local housing affordability issues affect staff, as well as those accessing our services. Throughout the sector there is a prevalence of fixed term

contracts, often because of the short-term nature of funding. These can cause employment instability and add to workload pressures.

WNC are signed up to the Armed Forces, Care Leavers Covenants and are a Disability Confident employer, to offer greater employment opportunities and increase representation from people in these groups. However, there are limited roles and services that encourage applications or build in routes to employment from those with lived experience of homelessness. We will build in routes to employment within the sector, from those with lived experience and build a sustainable workforce, to deliver our strategic ambitions.

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# WEST NORTHAMPTONSHIRE COUNCIL CABINET

7<sup>TH</sup> MAY 2024

## CABINET MEMBER FOR ADULT SOCIAL CARE, PUBLIC HEALTH – COUNCILLOR MATT GOLBY

<b>Report Title</b>	Commissioning of the Integrated Sexual and Reproductive Health services for West Northamptonshire.
<b>Report Author</b>	Dr Annapurna Sen, Consultant Health Protection and Health Care Public Health <a href="mailto:Annapurna.Sen@westnorthants.gov.uk">Annapurna.Sen@westnorthants.gov.uk</a>

### Contributors/Checkers/Approvers

<b>Monitoring Officer</b>	Catherine Whitehead	16/04/2024
<b>Chief Finance Officer (S.151)</b>	Martin Henry	16/04/2024
<b>Other Director</b>	Stuart Lackenby	12/04/2024
	Sally Burns	09/04/2024
<b>Communications Lead/Head of Communications</b>	Becky Hutson	16/04/2024

### List of Appendices

Appendix 1 – Sexual and Reproductive Health care pathway and Model of delivery

#### 1. Purpose of Report

- The purpose of this report is to seek approval from cabinet members for commissioning the West Northamptonshire Sexual and Reproductive Health services, and to delegate authority to the Director of Public Health (DPH) in consultation with the Adult Social Care and Public Health portfolio leader to initiate commissioning process.

## **2. Executive Summary**

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- 2.1. The document provides an update on the findings and the recommendations of improvement outlined in the West Northamptonshire Sexual Health Needs Assessment and Service Evaluation.
- 2.2. Sexual and Reproductive Health service is a mandatory service provision funded through the Public Health ring-fenced grant.
- 2.3. The existing Sexual Health contract commenced on 1<sup>st</sup> April 2019, with it being extended for two-years since 1<sup>st</sup> April 2023 and is due to expire on 31<sup>st</sup> March 2025.
- 2.4. Following a decision being taken at the Shared Service Joint Committee to split the countywide service contract and both local authorities to commission a service apt for their population's Sexual and Reproductive Health needs.
- 2.5. It has been recommended that the new contract is procured for a longer period and the suggested contract length is eight years (4+2+2) which is two years longer than the existing contract for stability, consistency, efficiency, and sustainability in service provision. The rationale behind the recommendation is:
  - 2.5.1.1.1. Sexual Health is a predominantly clinical service incorporating wide ranging health needs from emergency to lifelong care and requires consistent follow up to maintain a robust care and outcome. Some of the health outcomes are visible after a long treatment and follow up, therefore shorter contracts may interrupt the continuity of the service provision; also, frequent changes of the contractual arrangement and process will impact the stability in the service delivery, bring in logistic and financial implications of developing and implementing a new service. Implementation and mobilisation of a new service demands rebuilding trust and rapport with the patient population and may affect consistency of care contributing towards poor Sexual Health outcomes. A longer contract length will be more appealing to the market and facilitate alternative providers submitting tenders as they will have more opportunities to better invest in setting up a new service, leasing premises, etc. Internal efficiency saving will also be made through reducing the amount of commissioning and procurement activities.
- 2.6. The contract is a block contract with a financial envelope of £2,462,000 (£2.46 million) per year with a total cost of £19,696,000 (£19.7 million) towards 8 years (4+2+2) of contract.
- 2.7. The Sexual Health service also includes HIV (Human Immunodeficiency Viruses) Services which is commissioned by NHS England under Section 75 arrangements and has a separate budget allocation of £4,467,000 (£4.6 million) per year. The West Northamptonshire Services is apportioned with around £2.35 million per year towards primary and community services (approx. 25%), and for treatment and rehabilitation in secondary and tertiary care (approx. 75%). This comes from the NHS England under a separate commissioning arrangement.

### **Recommendations**

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- 2.8. It is recommended that the Cabinet members:
  - 2.8.1. Approve the commissioning of integrated Sexual and Reproductive Health Services for West Northamptonshire and.

- 2.8.2. Delegate authority to the Director of Public Health to initiate the commissioning process in consultation with the portfolio holder.

#### **Reason for Recommendations:**

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- 2.9. Sexual and Reproductive Health is a mandatory service.
- 2.10. To comply with legislation and the policy of the Council.
- 2.11. The recommended care pathway and service model is both cost efficient and clinically effective and has been enhanced to meet the future health needs of the population due to the continuously changing demographic profile of West Northamptonshire.

### **3. Report Background**

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- 3.1. A joint Sexual Health Needs Assessment has been carried out in 2022 – 2023 and the report was completed in November 2023. West Northamptonshire also conducted a Service Evaluation to analyse gaps in service provisions and its impact on Sexual Health Outcomes.
- 3.2. The observations from the needs assessment report demonstrate:
  - 3.2.1. The rate of all new Sexually Transmitted Infections (STI) was 411.1 per 100,000 in the year 2022, which was lower than the East Midland (571.9 per 100,000) and England (694.2 per 100,000) average.
  - 3.2.2. STI testing rates in the similar period was 1,541.5 per 100,000 which were significantly lower than the East Midland (3,046.6 per 100,000) and England (3,856.1 per 100,000) average and continue to decline.
  - 3.2.3. HIV testing coverage in 2022 was 64.2% which was higher and better than the East Midland (38.5%) and England (48.2%) averages. However, a five-year trend is showing a decline for West Northamptonshire.
  - 3.2.4. Late HIV diagnosis for West Northamptonshire is a concern as the percentage of those between 2020 to 2022 was 65.5%, which was significantly higher than the East Midland (47.9%) and England (47.9%) averages.
  - 3.2.5. Under 16 conception rates reported in 2021 was 1.4 per 1,000 and was better than the East Midland (2.0 per 1,000) and England (2.1 per 1,000) averages and.
  - 3.2.6. Abortion rates in 2021 were 21.1 per 1,000 which was higher the East Midlands (17.3 per 1,000) and the England (19.2 per 1,000) averages.
- 3.3. The observations from the Service Evaluation suggest:
  - 3.3.1. Budget redistribution and reallocation required to meet the changing demand within the Sexual Health care activities.
  - 3.3.2. Unclear guidance to the provider in the service specification to meet the needs of underserved, marginalised and hard to reach high-risk groups.
  - 3.3.3. The outreach model of care delivery was not clearly defined in the existing service specification affecting service delivery and monitoring.
  - 3.3.4. Decentralisation of services required to reach out to periphery and improve accessibility

- 3.3.5. Inadequate resources and capacity to deliver Relationship and Sex Education curriculum.
- 3.3.6. Lack of comprehensive communication plan to educate and promote importance of Sexual Health and.
- 3.3.7. Undefined formal collaboration and co-production with neighbouring local authorities and health partners to improve accessibility.
- 3.4. Our enhanced care pathway and model of service delivery has been devised based on the following recommendations from the Health Needs Assessment and Service Evaluation:
  - 3.4.1. An option appraisal has been carried out to develop the most feasible service delivery model for addressing the existing gaps to improve service provisions and access to service with both cashable and non-cashable efficiency saving.
  - 3.4.2. Revised service model will align with the National service specification published in March 2023 as well as the Northamptonshire Live Your Best Life ambitions and will have additional key performance indicators to have improved measures of the output of the activities and health outcomes.
  - 3.4.3. An extended outreach model with additional resources and capacity will be included in the new contractual arrangements.
  - 3.4.4. Contribute to improved delivery of Relationship and Sex Education (RSE) by developing a consistent RSE curriculum across West Northamptonshire and.
  - 3.4.5. Equitable financial allocation to various service activities within the provisions informed by programme budgeting and marginal analysis findings.
  - 3.4.6. The new model of delivery will ensure that the service provisions include:
    - 3.4.7. Integrated services (i.e., the provision of STI testing, diagnosis, treatment, and contraception being available on one site, at levels which are appropriate to that site, so service users can have all their sexual health and contraception needs met in one visit where appropriate);
      - 3.4.7.1 Dual-trained staff to deliver the integrated services.
      - 3.4.7.2 Open access services (i.e., individuals from anywhere in the county will be able to access our services and the residents of WNC can access services out of the county);
      - 3.4.7.3 A shift from the centralised service provision to community-focused provision;
      - 3.4.7.4 Targeted provision to address areas of high needs with individuals and groups having particularly high rates of STIs and unwanted conceptions identified through Local Area Partnership profiling.
      - 3.4.7.5 Outreach testing to vulnerable and at-risk groups, potentially in partnership with voluntary sector.
      - 3.4.7.6 Provision of psychosexual services (to be considered in conjunction with the ICB, as the commissioners of non-sexual health elements of psychosexual services);
      - 3.4.7.7 Development of a self-care approach, including provision of information, sexual health education across all age groups and availability of home-sampling;
      - 3.4.7.8 Working with clinical colleagues in primary and secondary care to reduce late diagnosis through increased awareness, early screening, and timely treatment;



- 3.4.7.9 Improved targeting of provision to those most at risk of STIs, Blood Borne Viruses infections and unplanned pregnancy, particularly through partnership work with other providers/agencies/departments and outreach into target communities;
- 3.4.7.10 Provision of training for front line sexual health staff on safeguarding, domestic violence, and Female Genital Mutilation;
- 3.4.7.11 Training and skills for front line staff working with particularly vulnerable groups to identify need and proactively signpost patients to relevant services (e.g. sex workers, drug and alcohol users, victims of domestic violence, asylum seekers);
- 3.4.7.12 Yearly communication plan and health education to raise awareness around Sexual Health and the local service offers.
- 3.4.7.13 Work with the systemwide inequality group to address inequality and inequity in service provision and access to service.
- 3.4.7.14 Link Sexual Health to other wider determinants of health such as alcohol and substance misuse, mental health, and violence.
- 3.4.7.15 Yearly clinical audit to assess the process output and clinical outcomes and two-yearly service evaluation to inform further improvement.
- 3.4.7.16 The varying needs of the population at the Local Area Partnership level (LAP) of West Northamptonshire and.
- 3.4.7.17 The model will see efficiency saving of around 8% from the second year onwards and non-cashable saving with better output in STI and HIV testing and treatment, contraception, and abortion services.

## **4 Issues and Choices**

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### **4.4 Do nothing:**

- 4.4.7 Is not feasible because the existing service will cease on 31<sup>st</sup> March 2025. “Choosing to do nothing” will disrupt continuity of care affecting health and wellbeing of people receiving treatment and care; and the local authority will be failing in its mandatory duties of commissioning comprehensive Sexual Health services.

### **4.5 Procure an improved and enhanced care pathway and service model:**

- 4.5.7 Local authorities are mandated to commission comprehensive and open access Sexual Health services.
- 4.5.8 Advantages of this service model are:
- 4.5.9 It includes a holistic perspective of Sexual Health involving physical, emotional, psychological, and intellectual dimensions to facilitate development of Sexually Healthy people over their life span.
- 4.5.10 The new service model will be based on collaboration and co-production with the neighbouring local authorities and health partners to ensure comprehensive and open access provision to provide confidential, non-judgemental service delivery including Sexually Transmitted infections, Blood Borne Viruses (including HIV), Contraception provision, Health promotion and prevention, and relevant Vaccinations to all the people who attend the service.

- 4.5.11 The new service model will be aligned with the Section 75 of the 2006 Act to exercise prescribed local authority and prescribed NHS functions for the delivery of the HIV services including HIV treatment, management, rehabilitation, and prevention with both pre and post exposure prophylaxis.
- 4.5.12 The contractual arrangements will be amended to align with the new National Sexual Health service specification published in March 2023.
- 4.5.13 The National service specification will be localised and inform WNC's new specification and care pathway.
- 4.5.14 Will have an improved care pathway of Integrated Sexual and Reproductive Health services aligned with the Section 75 HIV services.
- 4.5.15 The new service model will strengthen its outreach provisions to address the inequality and inequity of care identified in our underserved, marginalised and high-risk vulnerable groups; and
- 4.5.16 Please see appendix 1 for recommended model of service delivery and care pathway.

## **5 Implications (including financial implications)**

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### **5.4 Resources and Financial**

- 5.4.7 The Sexual and Reproductive Health services will be procured within the allocated budget (£2,462,000 per year) received from the Public Health Grant and will be adequate to meet the current Sexual Health needs of the population. Understanding of the budget allocation, spend and health outcome will allow us to reinvest money into other Public Health functions.
- 5.4.8 The new service demand is not expected to have additional resource or financial implications.
- 5.4.9 The new service will be a cost-efficient model of delivery with cashable efficiency saving of around 8% from the second year of service implementation; and foresee, for it to increase up to 12% towards the end of the contract. The new model will also bring in a non-cashable efficiency saving with better output in Contraception, STI and HIV testing and treatment.
- 5.4.10 The recommended model of service delivery will have improved clinical effectiveness due to enhanced collaboration and coproduction with NHS and non-NHS providers, neighbouring local authorities, also, with other public sectors including Police and prescribed places of detention; and by aligning it with other mandated council services such as 0-19 Children services, Adult and children Social Care and Education. This will have additional clinical benefits with measurable outcomes.

### **5.5 Legal**

- 5.2.1 The obligations and standards required for the Sexual and Reproductive Health services 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 the Council's Legal Services and be included in the invitation to tender documentation.

Under the Local Authorities (Public Health Functions and Entry to Premises by Local Healthwatch Representatives) Regulations 2013 each local authority shall make arrangements for the provision of Sexual Health services being offered to eligible persons in its area.



5.6 Risk

Risk	Mitigation	Risk Rating	Residual Risk
Failure to deliver Sexual Health services beyond March 2025 will result in a failure of the Council responsibility to deliver mandated Sexual Health services.	Commissioning a new sexual and reproductive health service integrated with NHS commissioned HIV service under section 75 arrangements.	High	Low
Reputational risk to the local authority for not being able to deliver the mandated service.	Maintaining commissioning cycle timeline without a gap in sexual and reproductive health service provision.	High	Low
Failure to deliver these services beyond March 2025 will result in a significant impact on the population's Sexual Health outcomes of Sexually Transmitted Infections, Reproductive health, and Blood Borne Viruses (including HIV).	Maintaining commissioning cycle timeline without a gap in sexual and reproductive health service provision and avoid delays in procurement.	Moderate	Low
Indirect Implications on other local authority services such as Adult Social Care, Children's Services and Education.	Ensuring continuity of Sexual and Reproductive Health services are in place.	Moderate	Low
Failure to deliver local Sexual Health services beyond March 2025 will add burden of increased future cost due to West Northamptonshire residents accessing out of area services.	Ensuring continuity of Sexual and Reproductive Health services are in place.	Moderate	Low
Changing demography may increase demand of services which subsequently lead to potential resource and financial implications.	Regular service review and financial auditing to ensure resource and budget mobilisation within the given envelope.	Low	Low

## **5.7 Consultation and Communications**

- 5.7.7 The new service specification and model of delivery is an improved version of the existing model of service provision based on the recommendations of Health Needs Assessment, and Service Evaluation where service users and providers were consulted.
- 5.7.8 This report has been produced for West Northamptonshire Council and submitted through the established governance arrangements.
- 5.7.9 There are clear National guidelines for the delivery of the clinical elements of the Sexual Health services and the specification, model of care will adhere to the National guidance.
- 5.7.10 Following a provider being appointed, communications will be issued to ensure residents, stakeholders and partners are aware of the new service delivery model.
- 5.7.11 Communications will work closely with the appointed provider to share and raise awareness of any messaging and comms activity regarding raising awareness of the service offers.

## **5.8 Consideration by Overview and Scrutiny**

- 5.8.7 Not Applicable

## **5.9 Climate Impact**

- 5.9.7 During the preparation for new arrangements from 2025 climate impact has been given consideration in the new model of service delivery.
- 5.9.8 We will use 'Social Value Portal' for the procurement, and in this process, bidders will have opportunity to say how carbon emission will be reduced through their service delivery and will be rewarded with extra scores for including carbon reduction process and actions. The contract and tendering process will be aligned with WNC TOM's (Themes, Outcomes and Measures) guidance.

## **5.10 Community Impact**

- 5.10.7 The report considers the Sexual Health and wellbeing of West Northamptonshire resident population. Improved accessibility and enhanced delivery of the Sexual Health services will have a positive health and wellbeing outcome for the population. It will also address the inequality and inequity experienced by the underserved, marginalised and high-risk vulnerable groups and will improve health and quality of their life.

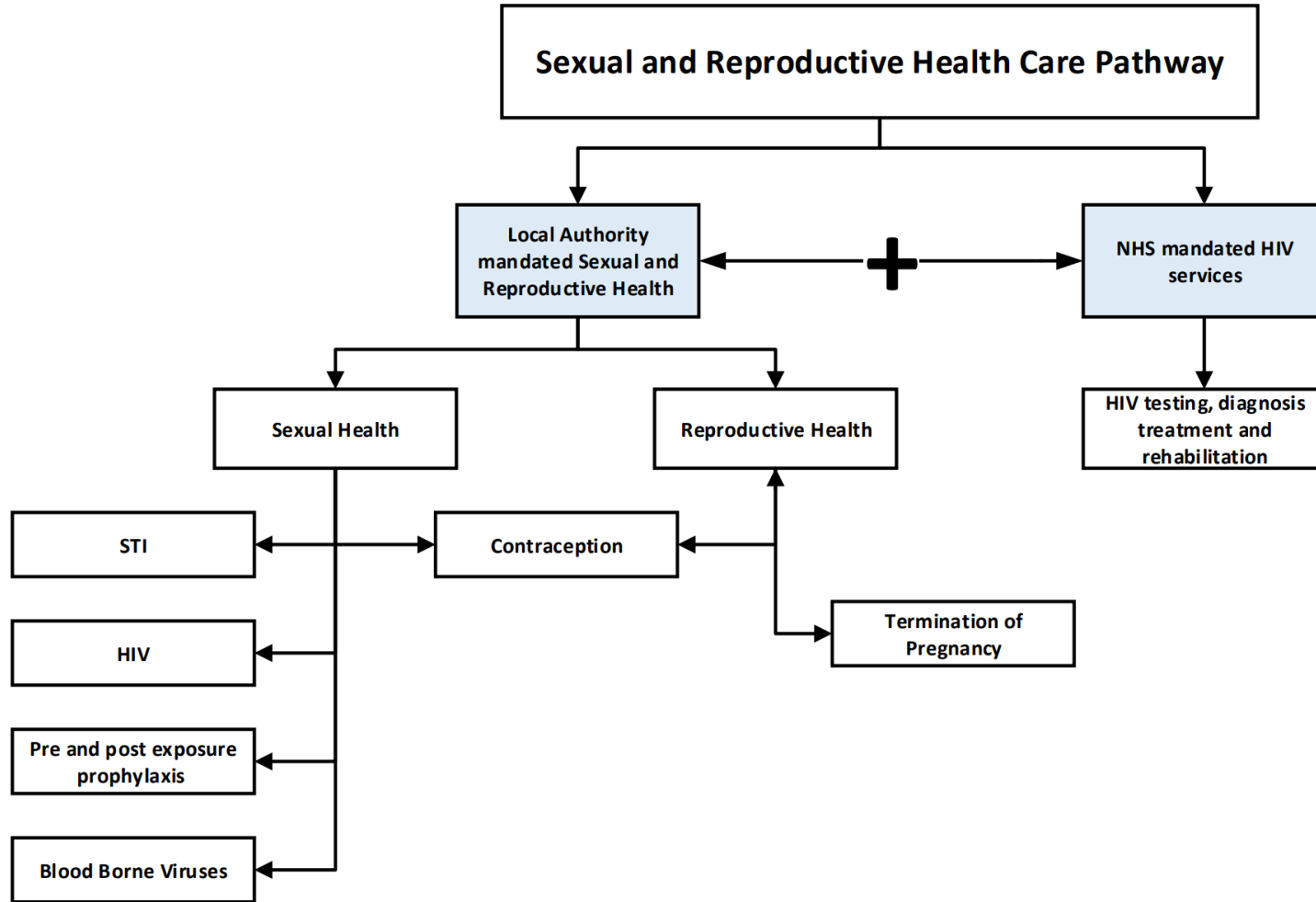
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## **6 Background Papers**

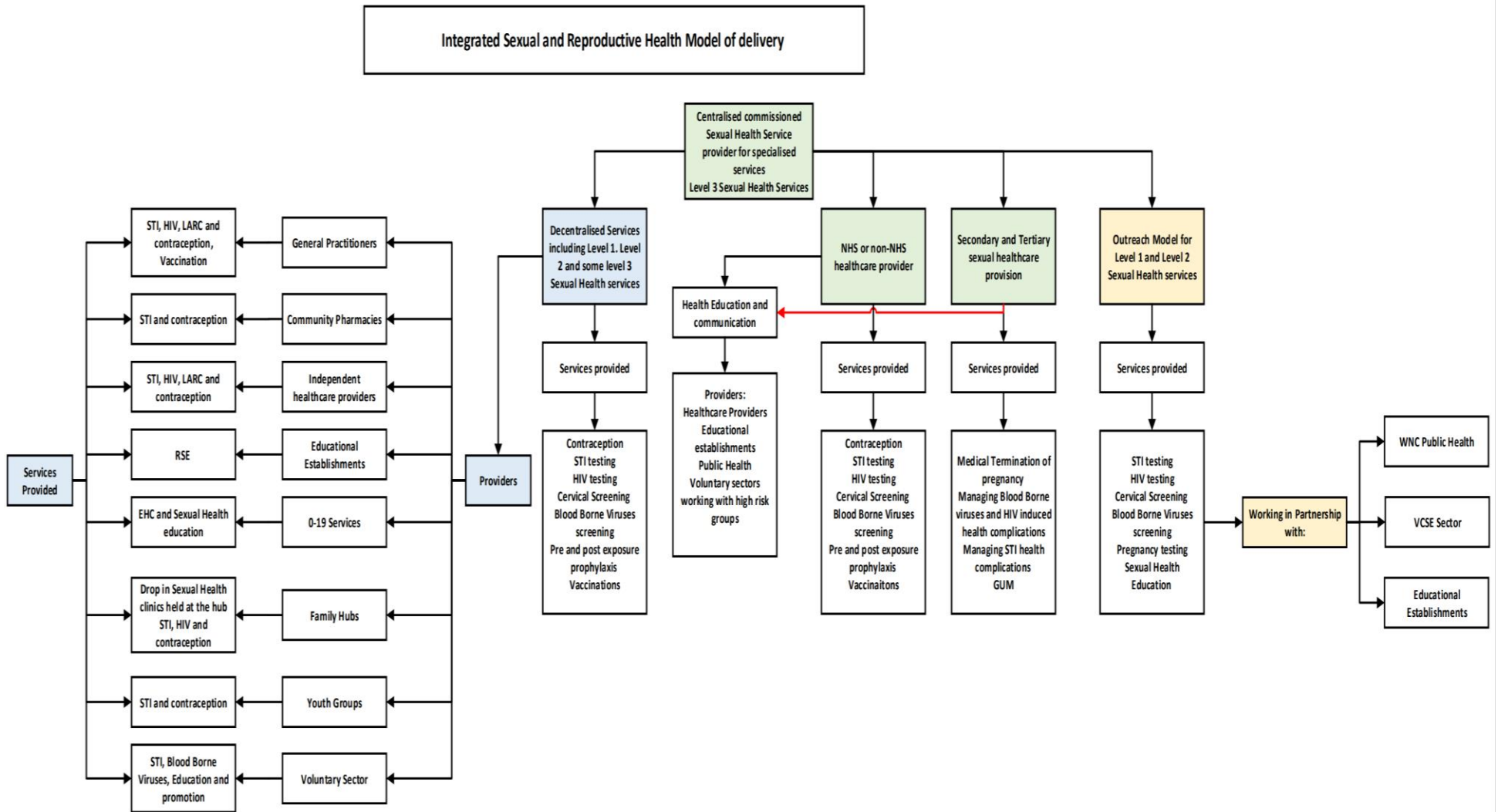
- 6.1 Sexual Health Needs Assessment and Service Evaluation are available on request.

Appendix 1: Sexual and Reproductive Health care pathway and Model of delivery

Figure 1 Sexual and Reproductive Health Care Pathway Diagram



**Figure 2: Sexual and Reproductive Health Model of delivery diagram**



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# WEST NORTHAMPTONSHIRE COUNCIL CABINET

7<sup>TH</sup> MAY 2024

## CABINET MEMBER FOR ADULT SOCIAL CARE AND PUBLIC HEALTH: COUNCILLOR MATT GOLBY

<b>Report Title</b>	Options for Contracting Arrangements and Service Delivery model for 0-19 Health Visiting and School Nursing Service
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<b>Report Author</b>	Racha Fayad – Public Health Principal <a href="mailto:Racha.fayad@westnorthants.gov.uk">Racha.fayad@westnorthants.gov.uk</a>
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### List of Approvers

<b>Monitoring Officer</b>	Catherine Whitehead	16/04/2024
<b>Chief Finance Officer (S.151)</b>	Martin Henry	16/04/2024
<b>Other Director</b>	Stuart Lackenby Sally Burns	16/04/2024
<b>Communications Lead/Head of Communications</b>	Becky Hutson	16/04/2024

### List of Appendices

None

#### 1. Purpose of Report

- 1.1. The purpose of this report is to seek approval from cabinet members for the recommended option to commission the West Northamptonshire 0-19 Health visiting and School nursing service, and to delegate authority to the Director of Public Health (DPH) to lead in consultation with the Adult Social Care and Public Health portfolio leader and children service portfolio holder on this commissioning, procurement, and mobilisation.

## 2. Executive Summary

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- 2.1 The 0-19 Healthy Child Programme (0-19 HCP) is delivered locally by Northamptonshire Healthcare NHS Foundation Trust (NHFT). The service is currently delivered as a county-wide offer for children, young people and families living across WNC and NNC.
- 2.2 The 0-19 Healthy Child Programme provides a framework to support collaborative work and more integrated delivery and aims to:
- help parents develop and sustain a strong bond with children
  - encourage care that keeps children healthy and safe
  - protect children from serious disease, through screening and immunisation
  - reduce childhood obesity by promoting healthy eating and physical activity
  - identify health issues early, so support can be provided in a timely manner
  - make sure children are prepared for and supported in all childcare, early years and education settings and especially are supported to be 'ready for to learn at two and ready for school by five'
- 2.3 The Healthy Child Programme is led by qualified public health nurses, including health visitors and school nurses, who with their professional teams (the 0-19 Service) provide the vast majority of the Healthy Child Programme. The Programme does, however, rely on effective partnership working and collaboration with a wide range of other health and social care professionals.
- 2.4 The Healthy Child Programme (HCP) requires all families with babies to be offered 5 mandated health visitor reviews before their child reaches 2 and a half years old.
- 2.5 Public health services commissioned by local authorities form part of the 'whole system' of support for children and young people's health and wellbeing. Local authorities are well placed to ensure integrated commissioning and delivery with a wide range of stakeholders who provide support for physical and mental health and wellbeing, including the NHS and the voluntary and community sector, schools, and colleges.
- 2.6 The core public health offer for all children includes:
- child health surveillance (including infant physical examination) and development reviews
  - child health protection and screening
  - information, advice and support for children, young people and families or carers
  - early intervention and targeted support for families with additional needs
  - health promotion and prevention by the multidisciplinary team
  - defined support in early years and education settings for children with additional and complex health needs
  - additional or targeted public health nursing support as identified in the joint strategic needs assessment, for example, support for children in care, young carers, or children of military families
- 2.7 There is no set content of 0-19 Healthy Child Programme specification and so many local authorities commission different packages; some include ICB, and NHS England commissioned services in 0-19 service, and other deliver some elements in house.

### **3 Recommendations**

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- 3.1. It is recommended that the Cabinet:
  - 3.1.1 Support Option 2.2 as the new contractual model to commission the 0-19 service from 1st April 2025.
  - 3.1.2 Delegate authority to the Director of Public Health (DPH) to commissioning in consultation with the Adult Social Care and Public Health portfolio holder , and Children’s Portfolio holder on this commissioning, procurement, and mobilisation of the new service from April 2025.

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

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- 4.1. The 0-19 HCP service is a mandatory service.
- 4.2. To comply with legislation and the policy of the council.
- 4.3. The recommended course of action is the most cost-effective and will enable us as WNC to integrate the 0-19 service with children services under one management and one children’s services directorate.

### **5 Report Background**

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- 5.1. In 2009, the Department of Health set out an evidence-based programme of best practice, the Healthy Child Programme (HCP), with the ambition of making everywhere as good as the best by developing improvements in health and wellbeing for children and young people.
- 5.2. The HCP offers every family a programme of screening tests, immunisations, developmental reviews, and information and guidance to support parenting and healthy choices – all services that children and families need to receive if they are to achieve their optimum health and wellbeing.
- 5.3. The responsibility for the delivery of the HCP lies across a range of services, with Health Visiting and School Nursing having a key lead role.
- 5.4. The services include the delivery of nationally mandated public health functions including the Five Universal Mandated Health Reviews (before a child is 3 years old) and the National Child Measurement Programme. The annual oral health surveys are a statutory requirement.
- 5.5. The 0-19 Healthy Visiting and school nursing service delivering the Healthy Child Programme is provided by Northamptonshire Healthcare NHS Foundation Trust (NHFT) as a county-wide service at present and is managed by North Northants Council (NNC) on our behalf until March 2025.
- 5.6. On January 17th, West Northants Council and North Northants Council decided to contract separately and disaggregate the 0-19 Health Visiting and School Nursing service from March 2025.
- 5.7. In this report, Public Health is presenting the range of options on the future contractual arrangements and delivery model of 0-19 service for WNC.

## 6 Issues and Choices

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- 6.1 **Option 1:** Re-procure and commission a revised 0-19 HCP service with a new service specification that reflects the health needs assessment recommendations and consultation feedback from WNC children, young people, and their families.

Key Feature: Review services, endeavour to integrate and recommission 0-19 service exploring opportunity to compliment service provision with council services that contribute to PH outcomes. Competitive negotiated Tender process with service being provided from 1st April 2025. Contract length is yet to be agreed by procurement.

Advantages:

- Competition from providers driving up performance (if more than 1 provider bids)
- Opportunity to pursue Public Health commitment to joint activity within Family hubs programme across WNC

Disadvantages:

- Reduction in provision of 0-19 service during commissioning period and staff insecurity
- Resource intensive potential providers; current provider diverting resources from delivery into the procurement process in order to secure the continuation of the contract.
- Resource intensive for WNC staff- the commissioning process requires senior staff within PH, contracts and legal to develop and monitor a specification and contract. This resource can obviously not be deployed elsewhere during this work.

- 6.2 **Option 2:** In **house** provision of 0-19 HCP service to be delivered by WNC and this covers 2 sub-options:

- 6.3 **Option 2.1:** Full **in**-house provision of 0-19 HCP delivered by the local authority

Key Feature: All staff currently employed by NHFT to be TUPE'd into WNC.

Case Study: Lincolnshire- an in-house service has struggled to retain/recruit staff and has resulted in a reduction in performance. A dispute between PH Nurses and the local authority over pay and conditions, including their professional support led to strike action.

Integration: The service is integrated with Children's Services under one management structure and one integrated team that sits under Children Services (not Public Health). Children's Service performance team are responsible for reporting and monitoring on KPIs. Public Health is involved and has assurance through a Clinical Governance Board chaired by the DPH.

Advantages:

- Ensures service continuity via a revised specification based on an integrated 'in-house' service
- WNC would have full knowledge of, and control over, budgets.

Disadvantages:

- Infrastructure costs and capacity could be high - WNC would need to be CQC registered, a professional lead would be required, as would adequate Continual Professional Development, revalidation, and links to university training.
- Would not be acceptable to some NHFT staff with risk that staff may opt for early retirement as do not wish to transfer to WNC. It is likely (based on the experience of other areas) that staff would be resistant to this change (e.g., other areas have had strikes over similar cases)
- 2 tier workforces with TUPE'd staff on NHS terms and conditions and newly recruited staff on WNC terms and conditions.

6.4 **Option 2.2:** The 0-19 service to be integrated with clinical staff (e.g., NHFT or any other clinical provider) and staff from WNC working together in a team. This will enable greater collaboration and will demonstrate the benefits and challenges of more integrated ways of working that will help align health and social care services for Children and young people and families across WNC.

Key Feature: An agreement between the clinical Host organisation and WNC is required to cover ways of working, staffing arrangements, and any issues for e.g. clinical governance and liability. The clinical host will be the lead provider of the work and so the default position would be ways of working, yet this requires further development and staff consultation as we progress forward.

Advantages:

- Provides a systems-based approach to work together and drive forward evidence based, best practice, and promotes integrated working
- No reduction in provision during commissioning and greater stability for all parties
- Clinical and professional stability for staff.

Disadvantages

- New approach fear factor
- Staff challenges and resistance, which means that an imminent consultation will be required to mitigate this

6.5 **Option 3: Hybrid Approach** - 'Break up' single contract and consider options to commission or bring in house some elements of the 0-19 HCP service.

Key Feature: Review services and consider which, if any, elements could be effectively delivered by WNC and explore further the potential for improved outcomes for children, young people, and families. Possibility includes, school nursing service, weight management work (NCMP) all being integrated into WNC Children services as a newly developed Wellbeing service for 6-19 and up to 25 for SEND children)

Advantages:

- The potential to develop a strong prevention and early intervention offer
- Flexibility to use the budget and deliver a wellbeing service focused on prevention and early intervention including emotional health and wellbeing, weight management support, and aligning with the WNC youth offer
- Ability to further diversify skill mix of workforce, e.g. youth workers

## Disadvantages

- Any future reduction in staffing will come with large redundancy costs (NHS terms and conditions, long careers)
- Risk of failure to recruit to vacant posts if WNC is not regarded as attractive employer (due to T's and C's when compared against NHS) which will impact upon provision, including mandated contacts and safeguarding responsibilities.
- Risk of information security and governance if IT systems not compliant.

**Whichever option is chosen, it is predicted that the new contract will commence 1st April 2025.**

## **7 Implications (including financial implications)**

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### **7.1 Resources and Financial**

- 7.1.1 The 0-19 Public Health nursing service will be procured within the current allocated budget of £7.126m per year and will be funded from the ring-fenced Public Health Grant.
- 7.1.2 The service specification will be drafted to ensure the service can meet the current health needs of the 0-19 population whilst remaining within the current budget envelope
- 7.1.3 The new service is not expected to have additional resource or financial implications.

### **7.2 Legal**

- 7.2.1 Advice is currently being sought from Legal Services about options relating to procurement or partnership arrangements.

### **7.3 Risk**

<b>Options</b>	<b>Risks</b>	<b>Mitigations</b>
<b>Option 1:</b> Re-procure and commission a revised 0-19 HCP service with a new service specification that reflects the health needs assessment recommendations and consultation feedback from WNC children, young people, and their families.	New provider destabilising the system.  Reduction in provision of 0-19 service during commissioning period and staff insecurity.	Ensure we have a period of handover between the current provider and the new provider to work collaboratively on the mobilisation of the new service  Work with NHFT through the service improvement plans to ensure to ensure the continuity of services and prepare for the staff consultation.
<b>Option 2/Option 2.1:</b> Full in-house provision of 0-19 HCP delivered by the local authority	Staff insecurity as some NHFT staff may opt for early retirement as do not wish to	Ensure we have a robust staff consultation process in place

	<p>transfer to WNC. It is likely (based on the experience of other areas) that staff would be resistant to this change</p> <p>Infrastructure costs and capacity could be high - WNC would need to be CQC registered, a professional lead would be required, as would adequate Continual Professional Development, revalidation, and links to university training.</p>	<p>and we are working in partnership with NHFT</p> <p>We don't have additional budget to enable us as LA to take the service in house and fund these additional costs</p>
<p><b>Option 2/Option 2.2:</b> The 0-19 service to be integrated with clinical staff (e.g. NHFT or any other clinical provider) and staff from WNC working together in a team. This will enable greater collaboration and will demonstrate the benefits and challenges of more integrated ways of working that will help align health and social care services for CYP and families across WNC.</p>	<p>New approach fear factor</p> <p>Staff instability</p>	<p>Working in partnership with NHFT to design the new model and ways of working will help resolve this</p> <p>Ensure we are working with NHFT to start the staff consultation and reassure the staff that they will maintain all their NHS benefits</p>
<p><b>Option 3:</b> Break up' single contract and consider options to commission or bring in house some elements</p>	<p>Staff insecurity as some NHFT staff may opt for early retirement as do not wish to transfer to WNC. It is likely (based on the experience of other areas) that staff would be resistant to this change</p>	<p>Ensure we have a robust staff consultation process in place and we are working in partnership with NHFT</p>

## 7.4 Consultation and Communications

7.4.1 The options appraisal report is informed by the recommendations arising from the 0-19 Health Needs assessment.

7.4.2 The following consultation methods were used to inform the 0-19 health needs assessment:

- *Epidemiological* – A wide variety of data sources have been used to inform this HNA. The Office for National Statistics (ONS) and Office for Health Improvement and Disparities (OHID) Fingertips data. Local data have also been used and supplied by our system partners where available. Limitations in finding data have also been noted.
- *Surveys* - Three surveys were undertaken in March-April 2023 to gather insights into the health and wellbeing of children and young people, and their families. The surveys were targeted at parents and carers, primary and secondary school staff and stakeholders and wider partners. We received more than 2500 responses.

- Semi-structured Interviews – 32 semi-structured interviews were undertaken with stakeholders including Maternity services, ICB senior executives, Northamptonshire Children’s Trust (NCT) colleagues, 0-19 service provider, Strong start, Local Authority public health and Education colleagues and Voluntary community sector organisations. The key themes were identified using a thematic analysis and are summarised in the Engagement and Insight chapter.
- Public Engagement – WNC and NNC have commissioned Free2Talk in partnership with HomeStart Daventry and south Northants and NHFT participation to deliver a series of engagement workshops with children young people aged 0-19 and their families, as well as stakeholders and wider system partners. More than 120 children and young people, and 68 stakeholders were engaged throughout these workshops. A copy of the full engagement report can be found in the appendix.

7.4.3 More consultation with staff and service users will be undertaken as we progress in the development of the new service specification.

7.4.4 A comprehensive communications plan will be developed and implemented to effectively update audiences at each stage of the process, supporting a smooth transition for April 2025.

7.4.5 Communications will align with early help comms and development of family hub offers to help showcase integration as projects develop.

## 7.5 Consideration by Overview and Scrutiny

7.5.1 The report was taken to the Children, Education and Housing scrutiny committee on the 3<sup>rd</sup> April and the option that was supported by scrutiny is Option 2.2 - The 0-19 service to be integrated with clinical staff (e.g., NHFT or any other clinical provider) and staff from WNC working together in a team. This will enable greater collaboration and will demonstrate the benefits and challenges of more integrated ways of working that will help align health and social care services for CYP and families across WNC.

## 7.6 Climate Impact

7.6.1 During the preparation for new arrangements from 2025 climate impact has been given consideration in the new model of service delivery.

7.6.2 We will use ‘Social Value Portal’ for the procurement or partnership approaches we adopt. Potential providers will have opportunity to say how carbon emission will be reduced through their service delivery and will be rewarded with extra scores for including carbon reduction process and actions. The contract and tendering or partnership processes will be aligned with WNC TOM’s (Themes, Outcomes and Measures) guidance.

## 7.7 Community Impact

7.7.1 The report considers the 0-19 health and wellbeing needs of West Northamptonshire children and families. It was informed by the recommendations arising from the health needs assessment, Page 140



which had all the insights of the consultation we have undertaken as a council with children, young people and families living across WNC (including more than 2500 responses). Improved accessibility and enhanced delivery of the 0-19 services will have a positive health and wellbeing outcome for the population through our new designed family hubs programme. It will also address the inequality and inequity experienced by the underserved, marginalised and high-risk vulnerable groups.

## **8 Background Papers**

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8.1 The 0-19 Health needs assessment which was presented to Health and wellbeing board and will be soon published on WNC website.

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# WEST NORTHAMPTONSHIRE COUNCIL

## CABINET

7<sup>TH</sup> MAY 2024

### CABINET MEMBER FOR ADULT SOCIAL CARE AND PUBLIC HEALTH: COUNCILLOR MATT GOLBY

<b>Report Title</b>	<b>Household Support Fund (HSF) 5 Proposal: Distribution of Funds and Recipients for HSF5</b>
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<b>Report Author</b>	Sally Burns, Director Public Health <a href="mailto:Sally.burns@westnorthants.gov.uk">Sally.burns@westnorthants.gov.uk</a>
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#### Contributors/Checkers/Approvers

<b>Monitoring Officer</b>	Catherine Whitehead	16/04/2024
<b>Chief Finance Officer (S151)</b>	Martin Henry	16/04/2024
<b>Other Director/SME</b>	Stuart Lackenby	16/04/2024
<b>Communications Lead/Head of Communications</b>	Becky Hutson	16/04/2024

#### List of Appendices

None

## **1. Purpose of Report**

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- 1.1 The Household Support Fund 5 scheme has been announced by government officials as part of the continuation of the Cost-of-Living support packages. The draft allocations and guidelines for the scheme from DWP were published on 26<sup>th</sup> March 2024.
- 1.2 The HSF5 scheme has been converted to a 6-month scheme, (the most recent scheme was for 12 months) and will operate between 1<sup>st</sup> April 2024 and 30<sup>th</sup> September 2024. This report sets out the preferred option to complement the WNC Public Health Anti-Poverty Strategy and indicates how the scheme would be delivered to maximise the local impact across a wide set of situational needs.

## **2. Executive Summary**

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- 2.1 In the Spring 2024 Statement, Chancellor of the Exchequer, Jeremy Hunt announced that the Household Support Fund will be extended until 30<sup>th</sup> September 2024, offering a further free financial support to vulnerable households.
- 2.2 Launched in October 2021 to help those struggling financially in the wake of the pandemic, the aim of the fund is to provide households in need with small grants to cover essential living costs such as food, clothing, and utility bills. With the ongoing cost of living crisis, the fund has now been extended three times. In March 2023 it was extended until March 2024 and given £5,199,297 million of additional funding, and has now been extended further to September 2024, with a further £2,465,491.77 of funding.
- 2.3 The fund is available in addition to other government support schemes such as the Warm Home Discount, and the Winter Fuel Payment.
- 2.4 HSF5 will be delivered to households between 1<sup>st</sup> April 2024 and 30<sup>st</sup> September 2024. There is no DWP stipulation as to how the funds must be allocated or indeed the recipient cohorts as it is understood that Local Authorities are best placed to recognise the needs of their communities.
- 2.5 This paper provides an outline of the proposed Fund distribution strategy. It considers learnings from previous funding, Public Health priority level of those who are vulnerable and in hardship as well as the desire to provide long term sustainable support for residents.
- 2.6 The expectation is that payments should primarily be used to support households in the most need with food and energy bills due to the recent cost of living increases. The fund can also be used to support households with essential costs related to those items which are critical to maintain warmth and nutritious food and other essential household costs.
- 2.7 Whilst there are no exclusions, the guidance does identify specific cohorts of people for whom efforts should be made to support.

- 2.8 We know from experience that our biggest expenditure for previous Funds has been for children eligible for benefits related free school meals as they are reliant on financial support over school holidays.
- 2.9 The recommendations are built on the success of previous schemes. This support has ranged from Children’s Winter Food Support; households who contain employed contributors but who are on low income and do not receive full cost-of-living benefits; Food Banks, crisis support relating to food and fuel operated through a Voluntary Community Services Enterprise (VCSE) and distributed through the voluntary sector.
- 2.10 Management, oversight and operational delivery will be provided by the WNC Wider Determinants Team within Public Health.
- 2.11 The HSF5 allocated funds for 6 months from DWP to WNC be £2,465,491.77. Payment for the grant will be made in arrears, following the submission of quarterly MI returns.

### **3. Recommendations**

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- 3.1 It is recommended that the Cabinet/Committee:
- a) Notes that the Household Support Fund (5) investment is to be managed locally.
  - b) Approves the provisional scope and Diversity of Distribution as set out in section 4 of this report.
  - c) Approves the control and oversight approach to be undertaken through the existing WNC Public Health team.
  - d) Authorises any funds that have not been assigned or committed to by 30<sup>th</sup> September 2024 according to the distribution methodology set out in section 4, to be redistributed in line with the wider Department for Work and Pensions Guidelines.

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

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- It is recommended that the Household Support Fund (5) high priority recipients will be primarily funding a lower income sector of the working community, households in crisis and families with children.
- The distribution of funds must meet the wider communities’ financial needs, where other grants and funding are not available
- An application process is required, and will be managed in-house which provides additional security and confidentiality of data
- Where possible the level of duplication of grants for the same purpose must be minimised which is why the in-house team is recommended

- It provides real benefit to underpin the West Northamptonshire Anti-Poverty Strategy and ensure residents most in need receive support
- It builds on the successful Household Support Fund (4) partnership with the VCSE in distributing funds via the downstream voluntary organisations to residents that may not otherwise be identified through the benefits system
- All awards and funding should be complimented by wrap around support schemes to promote long term, sustainable support with financial wellbeing.

## 5. Report Background

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### Building on the Success of Household Support Funds 1, 2, 3 and 4

- 5.1 This report follows on from four successful Household Support Fund (HSF) scheme operating from December 2021 until March 2022 (referenced as HSF1), April 2022 until September 2022 (HSF2), October 2022 until March 2023 (HSF3) and April 2023 until March 2024 respectively (HSF4).
- 5.2 During the delivery of HSF 1 WNC were able to build a highly efficient on-line application portal which enabled residents to self-service their application rather than utilising the voluntary sector set up. Not only did this provide an effective option but it also removed a level of pressure from our partner, the Citizens Advice Bureau (CAB). In total we were able to distribute close to 100k food and fuel vouchers across Northamptonshire and issue all funds provided for, as well as achieving over 82% of the funding going to families with children.
- 5.3 For HSF2 we were able to distribute funds across several cohorts; families with children, pensioners who received pension credit and additional funds for these pensioners who were also registered as disabled and households who evidenced that they were suffering poverty for both food and fuel. This last category was distributed, for the first time, by a set of voluntary organisations managed by the Northamptonshire Community Foundation (NCF). All elements of the distribution were successfully managed and over 95% of all allocated funds were distributed.
- 5.4 The third tranche of DWP funding, HSF3, was £2,599,628.53. Under advisement from Public Health these funds are well under way of being distributed to approximately 17,500 households within the region. The recipients ranged from families with school children, donations to allow the purchase of food bank supplies, people who are employed within households but receive a low income and those experiencing crisis and vulnerability due to financial hardship and are able to visit the appropriate voluntary organisation.
- 5.5 The fourth tranche of funding, HSF 4, was £5,199,257.06. These funds supported over 140,000 households and individuals. A prime objective of HSF4 was that it should continue seamlessly from the end of HSF3 to maintain continuity of support. Throughout HSF4 it has been recognised that a change of approach is required in order to transition residents from immediate short-term support to long term, more sustainable support.

## **Co-ordination and management**

- 5.6 A Task and Finish Group set up in the final quarter of HSF4 including Public Health, VCSE Partners, Community Partnership colleagues and LAP representatives has been developing a sustainable support strategy to complement the WN Anti-Poverty Strategy.
- 5.7 HSF schemes 1, 2 and 3 have been managed through the Recovery and Wellbeing Project team, operating within Public Health, due to the uncertainty in ongoing continuity. Responsibility for HSF4 transitioned into the Wider Determinants Team within Public Health with additional administrative resource covered under the terms of the Fund.
- 5.8 Due to the short delivery time of HSF5, coupled with the established delivery strategy, it is expected that the management, operation and delivery will remain within Public Health with the support of Community Partnerships colleagues until the end of HSF5.

## **6. Issues and Choices**

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### **Principles and Objectives**

- 6.1 An objective is that HSF5 will continue as seamlessly as possible from the end of HSF4 to maintain continuity of support, particularly with regards to the school holiday food vouchers which have been provided for the Spring Term Holidays in line with previous arrangements.
- 6.2 We also in HSF5 have an opportunity to provide advice to those in receipt of hardship support, in addition to direct provision of energy saving measures to homes (e.g. insulation of hot water tanks, fitting draft excluders to a door, or replacing inefficient lightbulbs or white goods). As part of the current Northamptonshire Energy Saving and Advice Service (ESA) project, we will continue to support this workstream through the arrangement already in place.
- 6.3 It is also acknowledged that HSF5 offers an opportunity to support, to a greater degree, families in extreme hardship to move from emergency aid to more sustainable support. This will be achieved through provision of wraparound support and advice targeted to those receiving support, as well as through a linked pilot of upscaling food larders – encouraging those who need to access food aid parcels or are in receipt of vouchers to move on to membership of larders.

### **Working within the scope of the national guidance**

- 6.4 Unitary Authorities have discretion on exactly how this funding is used within the scope set out in the Department for Work and Pensions (DWP) Guidance (Appendix A).
- 6.5 Key requirements of the Fund are that it:

- Meets immediate needs and help those who are struggling to afford household essentials including energy and water bills, food, and wider essentials.
- Provides support that has a long-term sustainable impact, for example household items which would reduce bills in the long-term.
- Covers a wide range of low-income households in need, including families with children of all ages, pensioners, unpaid carers, care leavers and disabled people, larger families, single-person households, and those struggling with one-off financial shocks or unforeseen events.

6.6 Much of the guidance for HSF5 replicates that for the previous schemes, with some exceptions:

- Guidance on communications has been strengthened, making it clear that funding is being provided by the UK Government and not the Department for Work and Pensions. *“It is mandatory for Authorities to reference that the grant is funded by the UK Government in any publicity material, including online channels and media releases.”*
- There is also a need to have a policy or framework documenting our criteria, this will be based on the guidelines set out in appendix A. *“Authorities must have a clear rationale or documented policy/framework outlining their approach, including how they are defining eligibility and how households access The Fund.”*
- There is a stronger preference for vouchers over cash awards *“.. vouchers should be used instead of cash where possible.”*
- There is a stronger children and young people focus, with specific mention of young carers, children in care, and care leavers.
- The expected that money spent on advice services is minimal although, does recognise importance of sustainable support. *“We would not expect a large portion of funding to be spent on advice services.”*

6.7 Table 1 below sets out the groups agreed range of propositions aligned to the possible funding ranges.

6.8 Proposed Scope and Diversity of Funds Distribution:



**Table 1. Proposed Diversity of Funds Distribution**

Workstream	Types of Support	Estimated number of individuals/ households supported	Award value	Allocation	%	Admin cost (5%)	TOTAL
Families with children	School Holiday food vouchers	12,700	£15 per child, per week of summer holidays	£1,143,000.00	46%	£57,150.00	£1,200,150
	School essentials vouchers	12,700	£30 per child	£381,000.00	15%	£19,050.00	£400,050
Vulnerable Households Via Discretionary Trusted Referrer Scheme	Vouchers for food or wider essentials	>500	Various (subject to individual circumstance and household size)	£60,000.00	2%	£3,000.00	£63,000
Other households experiencing hardship - Grant Scheme for applications from VCSE partners targeting HSF specific cohorts and support types	Vouchers for food or wider essentials	Subject to Grant Award Value	Various	£764,087.40	31%	£38,204.37	£802,291.77
	Food Network Capacity						
	Energy Saving Measures and Advice						
	Tangible items						
<b>TOTAL</b>				<b>£2,348,087.40</b>		<b>£117,404.37</b>	<b>£2,465,491.77</b>

- 6.9 Task and Finish Group feedback will continue to be sought allowing the HSF5 scheme to be delivered as efficiently and effectively as possible. Continuous improvement intra scheme is a core attribute of the current operations team and each scheme has benefited from course corrections which allow the funds to be fully utilised.
- 6.10 An application process is required by DWP. We propose the implementation of a webform via which residents can indicate the type of support required (eg food, utility, money and debt advice), they can then be referred into the relevant owner of that workstream grant. This allows engagement and support to continue beyond September 2024.
- 6.11 Utilising supermarket vouchers for the payment of the HSF award provides additional household income and enables fuel or food to be paid for which can offset the normal household bills.
- 6.12 Where any HSF5 funds have not been assigned or committed by 30<sup>th</sup> September 2024 in accordance with the distribution methodology in the final version of table 1 below, in order to maximise the Council’s reach and support to the community, it is proposed to redistribute them in line with the wider Department for Work and Pensions Guidelines under the control and oversight of the responsible delivery team.
- 6.13 The following table illustrates how the recommended option meets the guidelines and best practices set out by DWP (to be completed)

DWP Guidelines	Option
<b>Energy and Water.</b> This may include support with energy bills for any form of fuel that is used for the purpose of domestic heating, cooking, or lighting, including oil or portable gas cylinders. It can also be used to support water bills including for drinking, washing, cooking, as well as for sanitary purposes and sewerage.	Energy Saving Measures and Advice
<b>Food.</b> This may include through vouchers, cash or in kind.	Food Bank/Larder capacity  Discretionary Support Vouchers for household essentials via trusted referrer support scheme
<b>Essentials linked to energy, water and food.</b> The Fund can be used to provide support with essentials linked to energy, water and food (for	Energy Saving Measures and Advice

<p>example insulation or energy efficient items which reduce bills, the purchase of equipment such as fridges, freezers, ovens, slow cookers or costs associated with obtaining these essentials such as delivery and installation). We encourage Authorities to consider supporting households on low incomes to repair or replace white goods and appliances with more energy efficient ones, or to invest in simple energy efficiency measures which will pay back quickly, such as insulating a hot water tank, fitting draft excluders to a front door, or replacing energy inefficient lightbulbs or white goods. The intention of this is to provide sustainable support which results in immediate and potentially long-lasting savings for the household.</p>	<p>Other voluntary support organisations Discretionary Support Vouchers for household essentials via trusted referrer support scheme</p>
<p><b>Wider essentials.</b> The Fund can be used to support wider essential needs not linked to energy, water or food should Authorities consider this appropriate in their area. These may include, but are not limited to, support with other bills including broadband or phone bills, clothing, period and hygiene products, essential transport-related costs such as repairing a car, buying a bicycle, or paying for fuel. This list is not exhaustive. It can also include one-off payments to prevent a crisis.</p>	<p>Other voluntary support organisations School essentials vouchers Discretionary Support Vouchers for household essentials via trusted referrer support scheme</p>
<p><b>Advice services.</b> The Fund may be used to provide supplementary advice services to award recipients, including debt, benefit and/or employment advice, where Authorities consider this appropriate. Authorities are reminded that the primary intention of The Fund is to provide support for those households most in need, and we would expect any advice services to complement this. We would not expect a large portion of funding to be spent on advice services. We would expect to see a connection between the funding provided for advice services and the practical support provided through The Fund. We anticipate that a significant proportion of this will be through signposting to existing advice services funded through other routes, such as the Help to Claim scheme which supports those making a claim to Universal Credit (UC).</p>	<p>Energy Saving Measures and Advice Other voluntary support organisations</p>
<p><b>Housing costs.</b> The Fund can be used to provide support with housing costs to those in need. However, where eligible, ongoing housing support for rent must be provided through the Housing cost element of UC and Housing Benefit (HB) rather than The Fund. In addition, eligibility for Discretionary Housing Payments (DHPs) must first be considered before housing support is offered through The Fund. The Authority must also first consider whether the claimant is at statutory risk of homelessness and therefore owed a duty of support through the Homelessness Prevention Grant (HPG). It is expected that the focus of support should be on bills and that support for housing costs should only be given where existing housing support schemes do not meet need. Beyond this, Authorities have discretion to determine the most appropriate use of The Fund for their</p>	<p>Discretionary Support Vouchers for household essentials via trusted referrer support scheme Other voluntary support organisations</p>

area, based on their understanding of local need and with due regard to equality considerations.	
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## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

7.1.1 The Household Support Fund is incremental to the base budget for 2024/25. The staffing costs will be extracted as part of the Administration Costs from the fund, estimated at 5% for planning purposes, as allowed for in the DWP guidelines. All HSF5 monies are expected to be distributed into the community by the end of September 2024, if not before.

7.1.2 There are no direct resources or financial implications to Council budgets arising from the proposals that are not already covered by the grant.

### **7.2 Legal**

7.2.1 There is a requirement for us to meet the grant conditions in distributing the Fund, there are no other specific legal implications arising from the proposal.

### **7.3 Risk**

7.3.1 Excess requests, for use of funds, from the assumptions provided and therefore the grant will be exhausted. The mitigation would be to consider options to utilise funds from within the Public Health budget or other appropriate grants.

7.3.2 Excess funds remaining prior to the closure of the scheme. The mitigation would provide weekly tracking of the funds run rate and as the distribution rate is modelled early contingency arrangements can be put in place

7.3.3 Duplicate requests may be received. The mitigation will be in the form of a control record, held at the centre, of all beneficiaries receiving the drawdowns from the fund.

### **7.4 Consultation and Communications**

7.4.1 Consultation with internal stakeholders has occurred continuously and a formal lesson learnt document will be produced post the closure of the current scheme, HSF4. Additional consultation with the various voluntary organisations, CAB and Northamptonshire Community Foundation will also be undertaken to provide input to the wider use of the Voluntary Sector and the accessibility of those in need. As a result of the lessons learnt document issued post the HSF3 scheme, changes to the way the recipients' data are collected (compliant with GDPR), analysed and used

to better manage communications and awareness to residents in high deprivation areas has been invaluable.

7.4.2 Communication will be critical to the Programme

7.4.3 The inclusion of specific web pages, member briefings and external press statements will be managed internally.

7.4.4 The communication themes will be linked to the Cost-of-Living information which is introduced by both Central Government and the localised teams

7.4.5 HSF5 will also benefit from the wide-ranging voluntary organisations we operate with and their local network of communications

7.4.6

#### 7.5 **Consideration by Overview and Scrutiny**

7.5.1 The management will ensure that any requests from the Scrutiny Commission will be responded to, and formal engagement or presentations required will take place.

#### 7.6 **Climate Impact**

7.6.1 Practical energy saving measures will be implemented and supported by our Third Party Organisations, both on referral and proactively. These will contribute towards CO2 emission reduction.

#### 7.7 **Community Impact**

7.7.1 The community will benefit significantly from the HSF5 scheme. There will be a minimum of circa 15,000 households positively impacted by the recommended HSF5 approach. Additional funds will support those who are experiencing severe financial hardship during the 2024/2025 period and working with voluntary organisations will enhance the co-ordination of the many referral teams within the council and external.

7.7.2 The distribution of funds is closely aligned to the areas of deprivation within the region, thus ensuring that the communities living in areas of significant poverty are prioritised.

## 8. **Background Papers**

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### Appendix A DWP HSF5 Guidelines.



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# WEST NORTHAMPTONSHIRE COUNCIL

## CABINET

7<sup>TH</sup> MAY 2024

### CABINET MEMBER FOR ENVIRONMENT, TRANSPORT, HIGHWAYS AND WASTE: COUNCILLOR PHIL LARRATT

Report Title	Proposed Changes to the Home to School Transport Policy
Report Author	Tom Callaghan, Head of Transport Delivery

#### List of Approvers

Monitoring Officer	Catherine Whitehead	16/04/2024
Chief Finance Officer (S.151)	Martin Henry	16/04/2024
Other Director	Stuart Timmiss	16/04/2024
Communications Lead/Head of Communications	Becky Hutson	16/04/2024

#### List of Appendices

**Appendix A – Consultation Summary Report**

**Appendix B – Post 16 Transport Policy Academic year 2024-2025**

#### 1. Purpose of Report

- 1.1. To share and consider the findings of the recent consultation on the proposed changes to the Post 16 Transport Policy and associated supported documents.
- 1.2. To seek approval by Cabinet for the implementation of the proposed changes to the Post 16 Transport Policy which will take effect at the beginning of the academic year starting in September 2024.

- 1.3. To seek delegated authority to allow the Executive Director of Place, Economy and Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste to make any changes to the policy which are necessary to ensure it remains compliant with legislation and Statutory Guidance issued by the Department for Education.

## **2. Executive Summary**

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- 2.1 This report outlines the results of the recent public consultation on the proposed changes to the Council's Post 16 Transport Policy.
- 2.2 This report sets out the recommended changes to the policy, the potential impact of these and the mitigations the Council will provide.
- 2.3 The changes being proposed are to help meet the increased demand and operating costs the service has experienced over the last 2 years, whilst at the same time attempting to create a fairer system and exploring opportunities to give greater flexibility for parents, support our young people's independence and help to promote sustainable travel. The proposals will also help maintain consistency with the Council's Home to School Transport Policy for children of compulsory school age.
- 2.4 Formal public consultation on the proposed changes to the policy commenced on 1<sup>st</sup> February 2024 and closed at midnight on Sunday 7<sup>th</sup> April 2024. There were 779 responses received via West Northamptonshire Council's online consultation platform, and 6 were received by email. A copy of the report is attached at Appendix A.
- 2.5 The proposed changes to the policy are summarised below:
  - 2.5.1 Increase the Cost of a Post 16 Bus Pass

This proposal is to increase the contribution towards the financial costs incurred by West Northamptonshire Council in providing transport, by increasing the cost of a bus pass for Post 16 students . The current policy provides discretionary travel assistance to non-entitled and Post 16 students at cost of £600 per annum and the revised policy will increase this to £1,000 which better reflects the actual cost of providing a seat for a non-entitled mainstream student.
  - 2.5.2 Increased use of Personal Travel Budgets (PTB)

The Council currently provides a PTB where this is requested by a parent or carer and where it represents a more efficient use of Council resources. Many parents and carers are not aware that the Council can offer a tailored PTB which meets the cost of their child's transport arrangements and gives greater flexibility compared with the fixed transport arrangements provided by the Council.

The revised policy will promote the use of PTB's and to make this the first offering where this is suitable for the family and represents the most efficient use of Council resources.
  - 2.5.3 Personal Travel Budget for Sole Transport



Under this proposal, travel assistance for students who require sole transport will be limited to a Personal Travel Budget unless in exceptional circumstances. This is because sole transport is often the most expensive transport for the Council to arrange and can often be sourced by parents or carers at a lower cost.

In exceptional circumstances where it is not possible for parents or carers to provide transport themselves or source suitable arrangements, then transport will be provided by the Council.

#### 2.5.4 Young Adults with an Education Health and Care Plan Undertaking Apprenticeships

The Council's current policy makes no provision for travel assistance for young adults aged 16-19 undertaking an apprenticeship and the revised policy will offer support by way of a Personal Travel Budget to their educational setting only where this is named in their Education Health and Care Plan. In exceptional circumstances the Council may provide transport and each case will be considered on its own merits.

Travel assistance will not be provided to the workplace setting.

#### 2.5.5 Transport at Normal Start and Finish Times

Under the current policy, transport is provided at the normal start and finish times of the education or training setting. This allows the Council to plan and co-ordinate transport efficiently and the proposal is to keep this arrangement. The Council will review the timings at the start of each academic year.

Consideration will be given to students who are attending a particular course or setting which is named in their Education Health and Care Plan where their needs are such that they are not able to be properly supervised outside of their course classes. Each case will be considered on its own merits and parents and carers will be able to appeal the Council's decision under its formal appeals process.

### **3. Recommendations**

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#### 3.1 It is recommended that the Cabinet:

- a) Approve the Revised Post-16 Transport Policy attached in Appendix B incorporating the changes outlined in this report and for this to be implemented and apply from the academic year starting in September 2024.
- b) Provide delegated authority to make any changes to the policy which are necessary to ensure it remains compliant with legislation and Statutory Guidance issued by the Department for Education.

### **4. Reason for Recommendations**

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- 4.1 Although the Council has a duty to prepare a Post 16 Transport Policy Statement each year, there is no statutory duty to provide free home to school transport for Post 16 students between 16-19 years of age.

- 4.2 The current policy has not been reviewed in over 10 years during which time the statutory guidance has been updated, the number of students receiving support has increased and the contribution of £600 has remained the same. As a result, the current policy needs to be reviewed.
- 4.3 There has been a significant increase in the cost of home to school transport and the change in contribution levels reflects this increase in cost. The proposed changes will help ensure that the cost of Post 16 Transport does not increase the financial burden on Council Tax payers.

## **5. Report Background**

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- 5.1 The home to school transport service is a statutory (legally required) service. West Northamptonshire Council currently supports over 6,000 children and young people by transporting them to and from school each day. The operation of this is complex and involves nearly 500 transport routes, supported by over 100 transport providers ranging from bus and coach companies to local taxi services.
- 5.2 Although students are now required to continue in education or training until the age of 18 years, the compulsory leaving age remains unchanged at 16 and therefore Local Authorities have no statutory duty to provide free transport for Post 16 students. Local Authorities have instead a duty to publish a “transport policy statement” each year, setting out how they will support young adults to access education and training.
- 5.3 The duty applies to young people of sixth form age and young people with Education, Health and Care Plans (EHC) up to age 25. The overarching intention is to ensure that learners of sixth form age are able to access education and training.
- 5.4 In summary, the eligibility criteria for support under the existing policy is outlined below:
- i. The student resides more than 3 miles from their nearest suitable educational establishment or training provider.
  - ii. The student is attending their nearest suitable school, further education college or training provider.
  - iii. The student lives below the statutory walking distance to the nearest suitable school and cannot reasonably be expected to walk due to their special educational needs or disability (SEND).
- 5.5 The above eligibility criteria remains unchanged under the revised Post 16 Transport Policy.
- 5.6 The current Home to School and Post 16 Transport policies have recently been reviewed and this concluded that the Council is not consistent with other similar local authorities in terms of the level of support it provides. The Council is also aware that the way in which we provide travel assistance has changed and we are currently providing transport for a number of sole occupancy journeys, many of which require the support of a passenger assistant.

- 5.7 We also have a low take up of personal travel budgets which can enable families to make their own transport choices for their child which can sometimes lead to the best outcomes.
- 5.8 These changes are being proposed in order to meet increased demand and operating costs that the service has experienced over the last 2 years, whilst at the same time attempting to create a fairer system and exploring opportunities to give greater flexibility for parents, support our young people’s independence and help to promote sustainable travel.

## 6. Issues and Choices

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### 6.1 Proposal 1: Increase the Cost of a Post 16 Bus Pass

- 6.1.1 This proposal is to increase the contribution towards the financial costs incurred by West Northamptonshire Council in providing transport, by increasing the cost of a bus pass for Post 16 Students. The current policy provides travel assistance to non-entitled and Post 16 students at cost of £600 per annum and the revised policy will see this increase this to £1,000 which better reflects the actual cost of providing a seat for a non-entitled mainstream student.
- 6.1.2 The cost of travel assistance will be subject to an annual review in line with the Council’s wider fees and charges review that takes place as part of the annual budget setting, and any change will be publicised and implemented from the start of the next academic year. This is consistent with the new charging arrangements for non-entitled compulsory school age children who purchase a seat on one of our existing contracted services.
- 6.1.3 Discounts for Post 16 low income students will continue to apply. For example, a mainstream learner from a low income household will receive a 50% discount and therefore pay £500, and a SEND learner from a low income household will continue to receive transport free of charge.

#### Impact and Possible Mitigations

- 6.1.4 The table below summarises the number of Post 16 learners who received support during the academic year 2022/2023 under the Council’s current Post 16 Transport Policy.

Post 16 Learners	SEN (£600)	SEN (Free)	Main Stream (£600)	Main Stream (£300)
WNC Schools	41	96	221	1
Colleges	115	161	460	201

- 6.1.5 As shown in the consultation feedback in Appendix A, a total of 91% of respondents disagreed with the proposal, with 79% strongly disagreeing with some respondents commenting that the increase is set too high especially in the current financial climate and cost of living increases. A number of respondents (7%) agreed with the proposal.
- 6.1.6 Many respondents expressed concerns over affordability, especially with households with multiple children and those lower income households residing in more rural areas. Some respondents acknowledged that the cost would need to increase but suggested that this should be done incrementally rather than in one go. There was also concern expressed by parents that

as their children are now expected to remain in education or training until the age of 18, then they should be treated in the same way as compulsory school age children, and transport should be provided free of charge.

- 6.1.7 There is also likely to be a negative impact for students living in more rural areas and who were previously entitled to free home to school transport during their compulsory school age education. These students may be disadvantaged when compared to their counterparts living in more urban areas who have greater access to better public transport, walking and cycling infrastructure and can therefore decide not to pay the higher cost and travel independently.
- 6.1.8 The EqIA identified impacts on age, disability and low-income groups including those from rural areas and options were explored as to how these could be mitigated.
- 6.1.9 It is proposed that more flexible and longer term payment options are provided to families and where needed, providing a period of up to 12 months. This will help reduce the impact of the increase in charge.
- 6.1.10 The Council will also waive the parental contribution where the overall cost of a Personal Travel Budget is at least £1,000 less than the cost of the Council providing transport. This would be subject to a value for money exercise by the Council and will be reviewed annually.
- 6.1.11 For families where they have 2 or more siblings in Post 16 education at the same time and who are eligible to support under the new policy, the Council will continue to allow a 50% discount for any additional child which will help reduce the financial burden.

## 6.2 Proposal 2 – Increased Use of Personal Budgets

- 6.2.1 A Personal Travel Budget (PTB) applies to those eligible for travel assistance and is paid either termly or monthly for parents/carers to use to ensure their child/young adult gets to and from their school or other further education in a way that meets the family's needs.
- 6.2.2 The Council currently provides a PTB when requested by the parent or carer where it represents better use of Council resources. The standard amount that can be paid under a PTB is £0.45 per mile for the cost of two return journeys for each day of attendance, however this can be increased where the actual cost incurred by the parent or carer is more than this.
- 6.2.3 The provision of a PTB gives parents and carers control over their child's travel arrangements and greater flexibility over how this is delivered when compared with the transport provided by the Council. It can also help ensure their child arrives at their education setting less anxious and ready to learn. The PTB will be set at a value which provides a realistic option for the parent/carers to undertake or source their own transport.
- 6.2.4 The proposal is to make a PTB the first offering where this represents the most efficient use of Council resources. Where this isn't a feasible solution, the Council will discuss and agree alternative travel arrangement with the family.

## Impact and Possible Mitigations

- 6.2.5 The Equality Screening Form identified that the proposal would not have a negative impact on any protected characteristics and could in fact provide a real opportunity for parents and carers to take control of their child's transport arrangements. This would enable greater flexibility for families and allow for alternative arrangements to be put in place such as drop off and pick up from a child minders or grandparents, which would not be offered under the arrangements put in place by the Council.
- 6.2.6 In terms of the consultation responses, 30% of respondents agreed that a PTB is a suitable alternative with 34% disagreeing. 35% of respondents expressed no opinion. Some responses were positive commenting that PTB's offered a personal choice to parents and may be more applicable for children with SEND where standard transport arrangements are not suitable. Other respondents felt that a PTB may not be suitable for all and were concerned over the workability of the scheme and how easily it could be administered and arranged for those wishing to take up this option.
- 6.2.7 The use of PTB's is something the Council is keen to promote and encourage further take up. The Council will waive the parental contribution where the overall cost of a Personal Travel Budget is at least £1,000 less than the cost of the Council providing transport. This would be subject to a value for money exercise by the Council and will be reviewed annually.
- 6.2.8 The Council is currently developing guidance documents for parents and carers to refer to when considering their child's transport options which will be available later this year.

### 6.3 Proposal 3 – Transport at Start and Finish Times

- 6.3.1 The current policy explains that all transport for Post-16's will be provided at the beginning and end of each day during term time only, unless there are exceptional circumstances. This allows the Council to plan and co-ordinate transport efficiently. The proposal is to keep this arrangement and the Council will review the timings at the start of each academic year.
- 6.3.2 This is an operational change, not a policy change, and it is important that educational settings, parents and carers are aware of the transport arrangements that will be offered to Post 16 learners. This is the reason why this was included in the consultation.
- 6.3.3 Consideration will be given to students who are attending a particular course or setting which is named in their Education Health and Care Plan where their needs are such that they are not able to be properly supervised outside of their course classes.
- 6.3.4 This will be decided on a case by case basis and parents and carers will be able to appeal the Council's decision under its formal appeals process.

#### Impact and Possible Mitigations

- 6.3.5 The Equality Screening Form identified that the proposal would not have a negative impact on any protected characteristics. Establishing a regular attendance pattern consistent with school

start and finish times could provide parents and carers the opportunity to seek employment or enhanced working patterns that are currently not available due to inconsistent timetables.

- 6.3.6 Colleges and other independent education and training settings have expressed concern that co-ordination of timetables with normal start and finish times for SEND students can sometimes be difficult to achieve given the course being taken and the individual's needs. They have advised that it may be difficult to make the necessary resources available to supervise SEND students who may need arrive before their timetable lessons or have to wait in the afternoon for their transport to arrive.
- 6.3.7 In terms of consultation responses, the majority of respondents agree or somewhat agree (78%) that transport should be provided at the start and end of the school day however a few respondents did suggest that some cases might require more flexible transport times. There was also some concern over the impact on students' participation in extra-curricular activities with some suggesting that transport should be flexible to accommodate extra-curricular activities. Others argue that extra-curricular activities are optional, and parents should arrange transport in these cases.
- 6.3.8 In order to address these concerns the policy will include provision to agree standard start and finish times with individual settings at the start of each academic year, and apply discretion for those students with an Education Health and Care Plan who due to their needs, are not able to wait for long periods for transport.
- 6.3.9 Educational settings will be expected to demonstrate why they are not able to supervise the student and will be expected to work with the Council to identify the most suitable arrangements to meet the needs of the student and ensure efficient use of Council resources.
- 6.3.10 As with all the proposals contained within the revised policy, all students and their families will retain the right to a formal appeal should they either be declined transport or where they feel the transport solution being offered is not suitable for their child.

#### 6.4 Proposal 4 – Travel Assistance for Apprentices

- 1.1.1 The current policy makes no provision for travel assistance to young adults aged 16-19 undertaking an apprenticeship.
- 1.1.2 The proposed policy seeks to address this and will, for a young person with an Education, Health and Care Plan and who is eligible under the Post 16 policy criteria, offer support by way of a Personal Travel Budget to the education setting. This will be subject to the setting being the nearest suitable. In exceptional circumstances, transport may be provided by the Council.
- 1.1.3 Travel assistance will not be provided to the workplace setting.

#### Impact and Possible Mitigations

- 1.1.4 Through the consultation 72% of respondents agreed with 10% disagreeing and 184 provided comments.

1.1.5 Through the Equality Screening Form no adverse impact was identified on any particular group. This is mainly due to the fact that this is an enhancement to the policy with support being provided where there was previously none.

## 1.2 Proposal 5 - Personal Travel Budget (PTB) for Sole Transport Arrangements

1.2.1 In certain cases, it is appropriate to provide a PTB, for those assessed as eligible for travel assistance, to students who travel on their own. This could be because the student lives in a rural area where no other students need transport, or because they have a high medical need and need to be transported on their own.

1.2.2 The Council currently provides a PTB for sole transport when this is requested by the parent or carer and where it represents a more efficient use of Council resources.

1.2.3 Where sole transport is needed, travel assistance will be limited to the provision of a Personal Travel Budget unless in exceptional circumstances. This is because sole transport is often the most expensive transport for the Council to arrange and can often be sourced by parents or carers at a lower cost.

1.2.4 In exceptional circumstances where it is not possible for parents or carers to provide transport themselves or source suitable arrangements, then transport will be provided by the Council.

### Impact and Possible Mitigations

1.2.5 The Equality Screening Form identified that the proposal would not have a negative impact on any protected characteristics. In addition, the policy includes provision for exceptional circumstances and maintains the right of appeal for parents and carers.

1.2.6 In terms of consultation responses, the 33% of respondents agreed that a PTB should be the first option where a student will be travelling alone, with 26% disagreeing. Comments received from the consultation include the need for clear individual assessments and support for families to source their own transport is essential as it will alleviate the stress and burden on parents, especially those in rural areas where taxi services may be scarce. There were also differing views on parental responsibility, with some arguing that parents should be responsible for their children's transport, especially if they are not deemed to be low income.

1.2.7 The use of PTB's is something the Council is keen to promote and to encourage further take up, one option included in the revised policy is to waive the £1,000 contribution which would normally be deducted from the PTB value agreed with the parent. This would be subject to the value of the PTB being at least £1,000 less than the cost of the Council providing transport directly. In these circumstances, families would then receive free transport for their child's Post 16 education.

## 1.3 Proposal 6 – Policy Compliance Audits

- 1.3.1 Currently the 3 main colleges in Northamptonshire administer the Council's Post 16 Transport Policy on our behalf and put in place the necessary transport provision and recharge the Council the cost of this less the student contribution of £600 or £300.
- 1.3.2 This is proposed to continue however, to ensure the policy is being interpreted correctly and eligibility is fully in accordance with the policy criteria, we are proposing annual compliance audits. The intention is to ensure the Council is only funding those students who are entitled to support and to assist the colleges in the planning and procurement of the transport they provide.
- 1.3.3 This is an operational matter and not a policy change and is deemed not to have an impact on Post 16 students or their families.

## 6.7 Other Proposals

- 1.1.1 As part of the policy proposals the Council is also promoting independent travel training and are currently undertaking a pilot in conjunction with 2 local charities and a local SEND school. The pilot includes the use of virtual reality to help children and young adults overcome some initial fears and help familiarise them with the likely barriers they may face on their journey. Direct accompaniment will then follow, where the child or young adult will be accompanied on their journey until they become confident undertaking this by themselves.
- 1.1.2 The objective of the pilot is to explore how the Council can assist children and young adults with a SEND to become more independent not only for the purposes of home to school transport but also wider life skills. It will also promote healthy living and seek to improve overall wellbeing.

## **2. Implications (including financial implications)**

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### **2.1 Resources and Financial**

2.1.1 The objectives of the revised policy are summarised below:

- To help the Council meet the increased demand and operating costs the service has experienced over the last 2 years.
- To provide a more equitable and fairer application of the entitlement to free home to school transport.
- Provide greater clarity and certainty over the criteria that will apply when determining a child's entitlement to free home to school transport.

The home to school transport service has experienced a significant increase in demand and cost with an overspend of £2.7m anticipated for the financial year 2023/2024. The changes to the policy will help mitigate some of these increases and allow the council to continue to provide support for Post 16 learners to access education and training

### **2.2 Legal**



- 2.2.1 The proposed policy, supporting documentation and Equality Impact Assessments have been reviewed by the Council's legal Services (Pathfinder Legal Services).
- 2.2.2 Local Authorities must comply with the public sector equality duty under the Equality Act 2010 ('EA 2010'). Local Authorities must consider the potential effect of their transport policy on disabled people, and parents of disabled children alongside other groups with protected characteristics.
- 2.2.3 Local Authorities need to ensure that their transport policies do not unlawfully discriminate in relation to protected characteristics or contravene the Human Rights Act and also that they comply with the Statutory School Travel and Transport Guidance.
- 2.2.4 Further, where the Local Authority is exercising a discretion, it needs to ensure that it does not fetter its discretion. Thus, it has to apply the principles of Natural Justice and observe that any process which it follows in reaching its final decision is within the realms of reasonableness, fairness, lawfulness and proper.

### 2.3 Risk

- 2.3.1 Any change to the Council's policy will give rise to a risk of legal challenge. The revised Post 16 transport policy and the associated Equality Impact Assessments have been reviewed by the Council's legal advisors and they are satisfied that the Council has met its legal duty in consulting on the proposals set out in this report, assessing the impact including all relevant stakeholders and individuals likely to be impacted by this change and identifying possible mitigations. This will help minimise the risk of legal challenge.
- 2.3.2 Should Cabinet not approve these changes at its May meeting, then the implementation of the revised policy will be delayed by a further academic year and will mean that the service will continue to be under financial pressure due to increased cost and demand. This is because the Council is required to publish its Post 16 transport policy each year by 31<sup>st</sup> May in order for it to come into force from September the same year.

### 2.4 Consultation and Communications

- 2.4.1 Formal public consultation on the proposed changes to the policy commenced on 1<sup>st</sup> February 2024 and closed at midnight on Sunday 7<sup>th</sup> April 2024.
- 2.4.2 The consultation consisted of an online questionnaire which was made available through the council's consultation hub, Citizen Space, at: <https://westnorthants.citizenspace.com/cet/post-16-transport-policy-statement-2024/> The questionnaire was offered in an alternative format including large font or easy read. Paper copies were made available where required. Alternatively, people could also respond via email at [schooltransportpolicy@westnorthants.gov.uk](mailto:schooltransportpolicy@westnorthants.gov.uk), or post using The Guildhall address.
- 2.4.3 A drop in session for parents was held at Guilsborough Academy on 27<sup>th</sup> March to receive feedback and inform the consultation.

- 2.4.4 Further drop in sessions will be arranged with colleges over the coming months to support parents and carers to understand the support the Council will put in place and the cost of this to them.
- 2.4.5 The consultation included access to all related documentation and material associated with the proposals along with further information and explanations around the reasoning for the proposals and frequently asked questions.
- 2.4.6 The consultation was publicised widely throughout the duration of the consultation period using different means including:
- Local press: A series of media releases that went to circa 370 newsrooms and individuals (including hyperlocal, local, regional, and national, print, digital and broadcast including the Chronicle and Echo and BBC Radio Northampton) from the council's Communications Team.
  - Social media:
    - 4 promotions using Twitter, reaching a cumulative total of 5,536 accounts
    - Additionally, the consultation was promoted through Facebook posts 4 times, reaching a cumulative total of 16,000 accounts
    - E-newsletters were sent on 4 different dates during the consultation. Articles were also included in news bulletins to town and parish councils.
    - Online council news pages: Internal communications and external public pages.
    - Notifications were sent to schools, colleges and other education and training establishments. In addition, a transport partnership working group was formed to help inform the consultation of the potential impacts of the proposals both on the settings themselves and their students and families.
    - Detail about the consultation was also circulated via email to those registered on the council's Consultation Register and Residents Panel (over 700 contacts), as well as being sent to council members and parish councils. Wider promotion of the consultation was encouraged through these means.
- 2.4.7 The Post-16 Transport Policy Consultation received a total of 785 responses. 779 were received via West Northamptonshire Council's online consultation platform and, 6 were received by email. Other feedback was received from the 2 drop in sessions held at Guilsborough Academy.
- 2.4.8 The online consultation questionnaire was structured in a way that respondents were able to comment on individual proposals. There was no requirement for respondents to answer every question, therefore the total of responses for each question may differ. A summary report of the consultation is set out in Appendix A.
- 2.4.9 Discussion on the consultation took place directly with the Northampton Parent Forum Group (WNVP) which included attending weekly meetings. As result, there have been minor changes made to the proposed policy. These changes are for clarity only and do not have a significant impact the proposals presented in this Cabinet report.

## 2.5 **Consideration by Overview and Scrutiny**

2.5.1 A summary of the proposed policy changes was presented to the Place Overview and Scrutiny Committee at their meeting held on 31<sup>st</sup> January 2024.

## 2.6 **Climate Impact**

2.6.1 Any reduction in the number of vehicles operated by the Council will help reduce the Council's carbon footprint. Additionally, the measures proposed within this report could give rise to an increase in children walking and cycling to school which will help with support the Council's health and wellbeing objectives.

2.6.2 There could be an increase in parents deciding to transport their child to and from school themselves as they are not willing to pay the cost of a Post 16 bus pass or they take up a PTB. The mitigations proposed will help to reduce this, however it is not possible to quantify how many parents may chose this option. Officers will work with schools to help promote more sustainable transport arrangements for parents and where requested, help schools procure their own transport.

## 2.7 **Community Impact**

2.7.1 Concern was raised in the consultation that the proposed changes could unfairly disadvantage families residing in more rural areas. There was also concern that existing congestion around some of the larger rural secondary schools could be exacerbated due to parents deciding to transport themselves.

2.7.2 Allowing parents greater flexibility in the way they pay the increased charge will help minimise the number of parents who decide to transport their child themselves.

2.7.3 In more urban localities, there could be a greater number of students who decide to either walk or cycle rather than pay for a seat on our contracted services.

## 3. **Background Papers**

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3.1 Equality Screening Forms and Equality Impact Assessments have been completed for each of the proposals and have been updated following the public consultation.

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**West  
Northamptonshire  
Council**

## Post-16 Transport Policy Statement Consultation 2024

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### 1. Executive Summary

- The Post-16 Transport Policy Consultation 2024 received a total of 785 responses. 779 were received via West Northamptonshire Council's online consultation platform, 6 were received by email.
- The consultation period for submitting responses was between 1<sup>st</sup> February 2024 and 7<sup>th</sup> April 2024
- Most of the responses received through the online consultation platform were from parents of students or apprentices (476).
- The consultation detail has been widely promoted using several means including local press, social media, newsletters, email notifications and public consultation drop-in events at the request of schools/colleges.
- Proposal to revise the contribution required by parents/carers and increase this from £600 to £1,000 per academic year with discounts being applied under specific circumstances:
  - For the revised contribution: 7 per cent agree, 91 per cent disagree, 1 per cent neither agree nor disagree. 609 comments were received on the proposal.
  - For the discount for low-income families: 81 per cent agree, 11 per cent disagree, 7 per cent neither agree nor disagree, 1 had no opinion. 292 comments received on proposal.
- Proposal to increase the use of Personal Travel Budgets instead of the Council providing transport where it is better value for money for the Council: 30 per cent agree, 34 per cent disagree, 35 per cent had no opinion. 186 comments received on proposal.

- Proposal to provide a Personal Travel Budget only for sole transport except in exceptional circumstances where transport may be provided by the Council: 33 per cent agree, 26 per cent disagree, 42 per cent had no opinion. 66 comments received on proposal.
- Proposal to provide a Personal Travel Budget to young adults undertaking an apprenticeship to the education setting only except in exceptional circumstances where transport may be provided by the Council: 72 per cent agree, 10 per cent disagree, 13 per cent neither agree nor disagree, 7 per cent had no opinion, 184 comments received on proposal.
- Proposal to continue to provide transport only at the normal start and finish times of the education or training setting: 79 per cent agree, 13 per cent disagree, 6 per cent neither agree nor disagree, 2 had no opinion, 136 comments received on proposal.

There were 164 general comments received on the proposals.

## **2. Introduction**

### **2.1 Overview**

We asked for views on changes being proposed to our Home to School Post 16 Transport service. These changes are required to meet increased demand and operating costs, whilst also exploring opportunities to give greater flexibility for parents, support our young people's independence and help to promote sustainable travel.

We recognise circumstances for each child, young person and family are often different, therefore we needed to know how each of our proposals may affect children, parents, and carers. We also sought views from schools and colleges who may also be affected.

This is part of a larger review of transport policies.

The changes we are proposing will not come into effect until September 2024.

As well as inviting general comments on the draft Post-16 Transport Policy Statement, the consultation focused on the following key areas of Home to School Transport, respondents could choose to comment on some or all. The key areas of this consultation:

- Increase in the parent/carer contribution towards the cost of Post 16 Transport
- Support for young adults undertaking apprenticeships
- Increased use of Personal Transport Budgets (PTB)
- PTB where sole transport would be the only suitable option, unless in exceptional circumstances
- Transport provision only at standard school/college start and finish times.

This document sets out the summarised results to the consultation which took place from 1<sup>st</sup> February 2024 to 7<sup>th</sup> April 2024.

### **2.2 Related documents**

- Supporting information

- Draft West Northamptonshire Council Post 16 Education Transport Policy (September 2024 – July 2025)

### **2.3 How to have a say**

People were invited to have their say by either:

- Completing an online survey
- Emailing or writing in.

### **2.4 Method**

The consultation consisted of an online questionnaire which was made available through the council's consultation hub, Citizen Space, at:

<https://www.westnorthants.gov.uk/news/reminder-have-your-say-post-16-school-travel-west-northants>

The questionnaire was offered in an alternative format including large font or easy read. Paper copies were made available where required. Alternatively, people could also respond via email at [schooltransportpolicy@westnorthants.gov.uk](mailto:schooltransportpolicy@westnorthants.gov.uk), or post using The Guildhall address.

Respondents were provided with related documentation and material that related to the proposals within the consultation. Respondents were also provided with further information and explanations around the reasoning for the proposals which were positioned throughout the parts of the online questionnaire for ease of accessing this information.

### **2.5 Publicity**

The consultation was publicised widely throughout the duration of the activity using different means including:

- Local press: A series of media releases that went to circa 116 newsrooms and individuals (including hyperlocal, local, regional, and national, print, digital and broadcast including the Chronicle and Echo and BBC Radio Northampton) from the council's Communications Team.
- Social media:
  - 4 promotions using Twitter, reaching a cumulative total of 5,536 accounts
  - Additionally, the consultation was promoted through Facebook posts 4 times, reaching a cumulative total of 16,000 accounts
- E-newsletters were sent on 4 different dates during the consultation. Articles were also included in news bulletins to town and parish councils.
- Online council news pages: Internal communications and external public pages.
- Notifications were sent to schools, colleges and other education and training establishments. In addition, a transport partnership working group was formed to help inform the consultation of the potential impacts of the proposals both on the settings themselves and their students and families.

Detail about the consultation was also circulated via email to those registered on the council's Consultation Register and Residents Panel (over 700 contacts), as well as being sent to council members and parish councils. Wider promotion of the consultation was encouraged through these means.



### 3. Response to the online consultation

There were 779 online responses to the questionnaire through the council's consultation platform.

The online consultation questionnaire was structured in a way that respondents were able to comment on individual proposals. There was no requirement for respondents to answer every question, therefore the total of responses for each question may differ.

#### 3.1 Response profile

Respondents were asked to choose one option to state what capacity they were responding to the consultation. This was a required question, there were 598 responses.

**Table 1, In what capacity are you responding to this consultation?**

<b>Respondent type</b>	<b>Count</b>
A parent or carer of a young person that attends school, college or other further education or training	476
A student aged 14 to 16 and considering further education or training	87
A student aged 16 to 19 and completing further education	64
A young adult aged 16 to 19 that is doing an apprenticeship or thinking of doing an apprenticeship	4
A student aged 19 to 25 with an Education, Health and Care plan	0
A transport professional (taxi, minibus, bus operator)	0
An educational professional (head, or another representative)	35
Another organisation, business or group	0
A resident of West Northamptonshire	0
A West Northamptonshire Council Councillor	9
A West Northamptonshire Council employee	2
A representative of a town or parish council	11
Other	
- Grandparent	2
- Family friend	1
- Relative	1
- Parent	3
- School Administrator	1
- Voluntary community group	1

#### **Parents and carers**

Those who responded as a parent or carer of a child or young person were asked a series of questions to assist us to build an accurate understanding of the characteristics and communities responding. 66 per cent of those who stated they were parents or carers, completed all or some of this part.

Parent and carer respondents were asked which age group applies to their children or young people; this question allowed for more than one answer as applied to any child within their care. There were 0 responses to this question.

**Table 2, Which age group applies to your children or young people?**

<b>Response</b>	<b>Count</b>
Age 0 to 4 (Early years)	0
Age 4 to 5 (Reception)	0
Age 5 to 11 (school years 1 to 6)	0
Age 11 to 16 (school years 7 to 11)	0
Age 16 to 18, post 16 (school years 12 to 13)	0
Age 19-25 with an Education, Care and Health Plan	0

Parents and carers were asked where their children or young people attended school. 0 said they go to school in West Northamptonshire, and 0 said they go to school outside the area. They were also asked about the type of school, if their children or young people currently receive home to school transport, the following questions allowed for more than one answer:

**Table 3, Which of the following describes your children or young people's current school or further educational establishment or training?**

<b>Response</b>	<b>Count</b>
Mainstream school	0
Grammar school	0
College	0
Special educational needs (SEND) setting	0
Apprenticeship	0
Other (please state below)	0

**Table 4, If applicable, which of the following currently apply to you, your children or young people?**

<b>Response</b>	<b>Count</b>
Eligible for free Post-16 Transport	0
Contributing £600 towards Post 16 Transport	0
Receiving a Personal Travel Budget for Post 16 Transport	0
None of the above	0

**About you**

Those who responded as a student were asked questions to assist us to build an accurate understanding of the characteristics and communities responding. 17 per cent of those who stated they were students, completed all or some of this part.

**Table 5, If you attend school, college or are in other further education, please select the option that applies:**

<b>Response</b>	<b>Count</b>
Mainstream school	103
Grammar school	1
College	9
Special educational needs (SEND) setting	8
Apprenticeship	1
Other	
- 6 <sup>th</sup> Form	4
- Foundation school	1
- Online	1

Students were asked where they attended school, college or further education. 118 said they go to school in West Northamptonshire, and 14 said they go to school outside the area.

**Table 6, Which of the following apply to you?**

<b>Response</b>	<b>Count</b>
I'm eligible for free Post-16 Transport	4
My parents/carers are contributing £600 towards Post-16 Transport	39
I receive a Personal Travel Budget for Post-16 Transport	1
None of the above	85

**Table 7, Do you have Special Educational Needs or Disabilities?**

<b>Response</b>	<b>Count</b>
Yes	26
No	97
Unsure	6

### **Table 8, Do you have a Education, Health and Care plan?**

There were 128 responses to this question.

<b>Response</b>	<b>Count</b>
Yes	12
No	101
Unsure	15

#### **Organisation**

Those who identified that they were responding on behalf of an organisation were asked to provide detail namely their organisation name and job role. Of the 23 that responded, they all identified as education providers or support services. Job roles and names of respondents are omitted from this report to protect anonymity. All of those who stated they were responding on behalf of one of these groups, completed all or some of this part.

Respondents to this part were asked if they could tell us if they provided certain services relevant to this consultation.

### **Table 8, Does your organisation or group provide any of the following?**

<b>Response</b>	<b>Count</b>
School transport services	11
Other services for children with SEND	14
None of the above	2

## **3.2 Parent/Carer Contribution for Post 16 Transport proposal**

Local authorities can charge a contribution towards the cost of providing transport to Post 16 Students. The draft proposals are to charge £1000 in order to reflect the costs that West Northamptonshire Council pays in providing transport for Post 16 Students.

The current policy requires a parent/carers contribution of £600 per academic year.

One of the proposed changes is to revise the contribution required by parents/carers and increase this from £600 to £1,000 per academic year. This better reflects the actual cost to the Council for providing a seat to a mainstream learner and will therefore help meet the costs of providing the service. The original cost was introduced over 10 years ago and hasn't been reviewed until now.

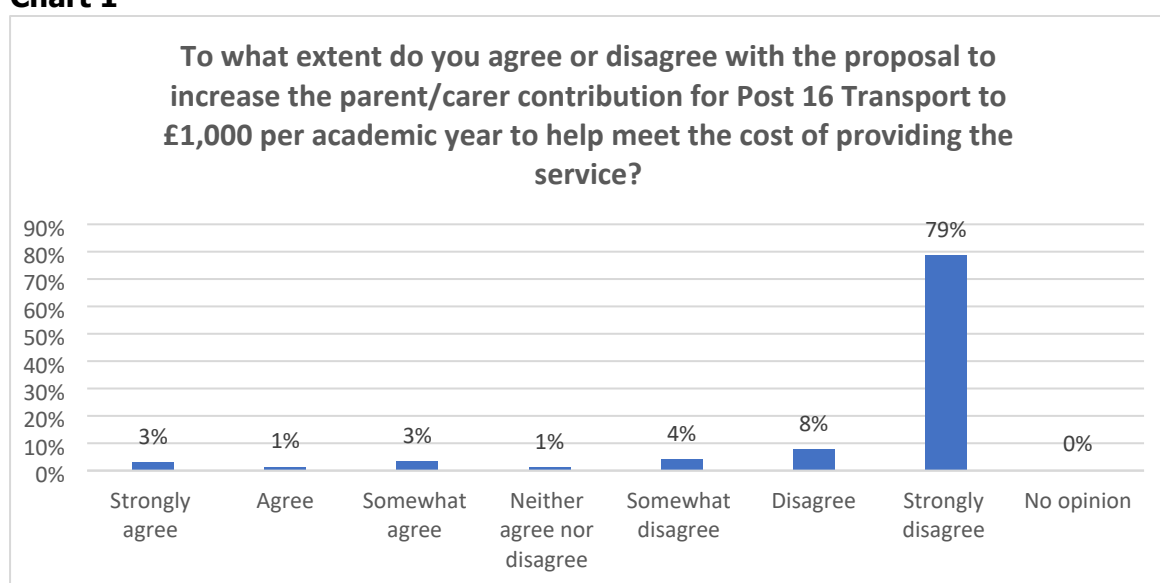
The following discounts will apply:

- For students that attend mainstream schools, where the family qualify on grounds of low income, the contribution will be reduced by 50% (£500).
- For SEND students whose parents/carers are on a low income, and where the student is aged 16 to 25 and has an Education, Health and Care Plan, transport will be provided free of charge.

**Table 9, To what extent do you agree or disagree with the proposal to increase the parent/carer contribution for Post 16 Transport to £1,000 per academic year to help meet the cost of providing the service?**

Response	Count	Per cent (%)
Strongly agree	21	3
Agree	9	1
Somewhat agree	23	3
Neither agree nor disagree	8	1
Somewhat disagree	28	4
Disagree	52	8
Strongly disagree	527	79
No opinion	2	0

**Chart 1**



Respondents were asked to provide any comments on the proposal to increase the parent/carer contribution for Post 16 Transport to £1,000 per academic year to help meet the cost of providing the service. 608 chose to provide comment. 31 comments were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

1. **Concerns about Affordability:** Many express concerns about the affordability of the increased costs, especially for families with multiple children in further education or those in low-income brackets. Some suggest that the increase is too steep and should have been implemented incrementally.
2. **Equality in Education:** There's a sentiment that post-16 education should be treated like pre-16 education, given its compulsory nature. Some argue for extending discounts to older students and ensuring that SEND pupils and those from deprived families are not adversely affected.
3. **Rural Areas and Distance:** The impact on rural areas, where public transport options are limited, is highlighted. Some question the fairness of charging the same cost for different travel distances.

4. **Service Quality and Timing:** Concerns are raised about the quality of service, including the early departure times for buses and the reliability of the service in winter.
5. **Alternatives and Suggestions:** Some suggest exploring partnerships or sponsorships to offset costs, adjusting charges based on actual costs, or ensuring that charges are in line with those in other regions. Others propose that parents should take more responsibility for their children's transportation.
6. **Support for the Increase:** A few respondents understand the need for the increase due to rising costs and express support, provided it doesn't impact disadvantaged students. Some believe the increase is reasonable and necessary to continue providing the service.

One respondent who said that they neither agree nor disagree but provided comment:

1. **Understanding:** Understand the reason, but the increase is too high.

The majority of the 670 comments received for respondents who strongly disagree, disagree, or somewhat disagree were about...

1. **Legal Requirement:** Since education until 18 is mandatory, it's argued that transport should be provided to facilitate this.
2. **Financial Strain:** The increase is seen as a significant burden on families, especially those in rural areas with limited public transport options and should to be more in line with inflation or implemented in increments.
3. **Equality:** The increase is viewed as disproportionately affecting rural parts of West Northants.
4. **Impact on Education:** Concerns are raised that the cost could deter students from continuing education after 16.
5. **Alternatives:** Some suggest that the cost should be reviewed annually or that transport should be free until the end of the school year in which students turn 18.
6. **Special Needs:** The increase could particularly affect students with special needs who rely on school transport.
7. **Environmental Impact:** The cost could lead to more parents driving their children to school, increasing traffic and pollution.
8. **Rural Disadvantage:** The policy is seen as penalizing students in rural locations, who have no other transport options.
9. **Administration:** Criticism is made of the current payment system, suggesting a direct debit option would be more efficient.
10. **Support for Parents:** There are calls for greater support for parents, particularly in rural areas.

No comments were provided by respondents who selected 'no opinion' or chose not to select an answer.

One respondent did not answer but chose to provide comment that fares should reflect the distance travelled and remain within inflation limits. They highlight that public transport to state schools should be promoted and funded. They warn that many families won't be able to afford the fare increase, leading to increased traffic and pollution, negatively impacting local residents,

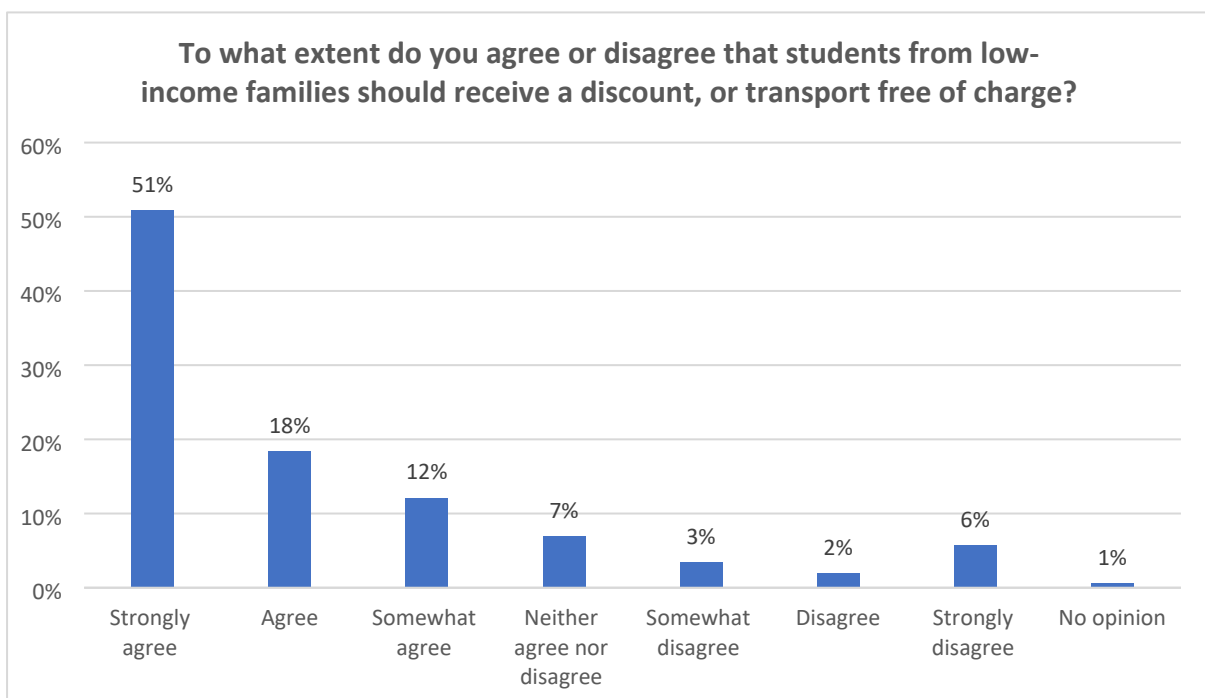
businesses, and pedestrian safety around the school. They highlight that one bus carrying 60 students could potentially remove 60 cars from the road, reducing traffic and pollution.

**Table 10, To what extent do you agree or disagree that students from low-income families should receive a discount, or transport free of charge?**

There were 665 responses to this question. This was not a required field.

Response	Count	Per cent (%)
Strongly agree	340	51
Agree	123	18
Somewhat agree	81	12
Neither agree nor disagree	46	7
Somewhat disagree	23	3
Disagree	13	2
Strongly disagree	38	6
No opinion	4	1

**Chart 2**



Respondents were asked to provide any comments on the proposal that students from low-income families should receive a discount, or transport free of charge. 396 chose to provide comment. The majority of comments (150) were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

1. **Equal Opportunities and Social Mobility:**
  - Financial penalties for attending school or college further reduce equality of opportunity.

- Support for low-income families should be gradual rather than abruptly dropped when a child is no longer officially in poverty but still faces financial challenges.
2. **Universal Access to Education:**
    - Ensuring equal opportunities for children from financially secure families and those from low-income backgrounds is essential.
    - Striking a balance is crucial to ensure that no group is unfairly burdened.
    - Low-income individuals deserve help, but we must also consider those who are just outside the benefits threshold.
  3. **Balancing Costs and Impact:**
    - While free transport is ideal, the reality is complex.
    - Families on the borderline of financial struggle may find it challenging to pay for transport.
    - A sliding scale approach, where support gradually decreases, could be more equitable.
  4. **Equal Access to Education:**
    - Disabled children benefit significantly from regular school attendance, and their abilities and needs should not hinder their access to education.
    - Families of young people with Education, Health, and Care Plans (EHCPs) should also be considered.
    - Ensuring that students can get to school is crucial. Without proper transportation, many kids won't be able to attend.
  5. **Personal Struggles:**
    - Balancing work and caregiving can be difficult, especially when transportation options are limited.
    - Some parents may be able to transport their children even with low income if they don't work.
    - Assistance should be tailored to individual circumstances.
  6. **Compulsory Education:**
    - Given that education is compulsory until age 18, free transport for all students until they complete sixth form seems reasonable.
  7. **Fairness and Practicality:**
    - Providing discounted or free transportation to these students is not only a matter of fairness but also practicality.
    - It helps alleviate the financial burden on families and ensures that students can focus on their education.
    - Funding from council tax, especially progressively based on property value, could be a more efficient approach.
  8. **Levelling the Playing Field:**
    - Education is considered the key to breaking the cycle of poverty.
    - If students from low-income families cannot attend school regularly due to financial constraints, they may fall behind their peers.
  9. **Professional Council-Run Transport:**
    - To create an equitable world, we should consider state-run school transport.
  10. **Means Testing:**
    - Means testing can help tailor assistance to those who genuinely need it.
    - A one-size-fits-all approach may not address individual circumstances.
  11. **Rural Areas and Active Travel Routes:**
    - Students in rural areas face additional challenges in accessing towns and villages.
    - Implementing Active Travel Routes in rural regions could make access to education cost-free.



- Many may choose alternative routes or even withdraw from education due to financial strain.
12. **Affordability for All:**
    - While £1000 per annum may not seem high-income, it can be a burden for families with multiple children.
  13. **Struggles and Mental Wellbeing:**
    - Families often face difficult choices between bills and essentials like food.
    - The rise in poverty affects mental wellbeing and overall quality of life.
  14. **Balancing Costs:**
    - While it doesn't have to be entirely free, a reasonable minimum charge could be considered.
    - A 50% reduction after reaching a threshold is a more nuanced approach.
  15. **SEND Children and Special Schools:**
    - SEND (Special Educational Needs and Disabilities) children should be included in this category.
    - Access to transport is crucial for them to reach their nearest special school. SEN (Special Educational Needs) children often attend schools miles away from home.
  16. **Defining Low Income:**
    - £1000 or £600 is indeed a significant amount for most families, regardless of how low income is defined.
    - Low income doesn't cover everyone's financial realities.
  17. **Affordability and Rural Locations:**
    - No child should be priced out of education.
    - Rural locations should be viable homes for families of all income levels.
    - In rural areas where walking or cycling isn't safe, students must have the ability to travel to school.

Fourteen respondents who said that they neither agree nor disagree provided comment:

1. **Affordability and Equality:**
  - **Agree:** Many believe that affordable or free transportation for low-income families is essential. Education is a right, and ensuring access to school without financial burden promotes equality.
  - **Disagree:** Some argue that affordability should not be limited to low-income families. Many families, regardless of income, find transportation costs challenging. It's not just about low-income households; it's about making education accessible for all.
2. **Threshold for Low Income:**
  - **Agree:** The threshold for low income is often set so low that even families slightly above it struggle financially. Adjusting this threshold could help more families qualify for assistance.
  - **Disagree:** Critics argue that expanding the threshold might strain resources and dilute the intended impact on the neediest families.
3. **Education as a Public Good:**
  - **Agree:** Education benefits society as a whole. Providing free or heavily subsidized transportation ensures that all students can attend school, fostering an educated and skilled workforce.
  - **Disagree:** Some contend that education is a personal responsibility, and families should bear the costs. They argue that other public services (like healthcare) are also essential but not universally free.
4. **Means Testing vs. Universal Approach:**

- **Agree:** Means testing ensures targeted assistance. However, applying the same criteria to sixth formers as younger students could simplify the system.
  - **Disagree:** Treating everyone equally, regardless of income, avoids stigmatization. If education is compulsory, it should be covered universally.
5. **Impact on Student Choices:**
- **Agree:** High transportation fees can deter students from continuing their education. Increasing costs disproportionately affects low-income families, limiting options.
  - **Disagree:** Some argue that students should consider proximity when choosing schools. If a local school is accessible, transportation costs may not be an issue.
6. **Middle-Income Families:**
- **Agree:** Middle-income families often fall through the cracks. They work hard but don't qualify for assistance. Equal treatment for all ensures fairness.
  - **Disagree:** Critics say that resources are finite, and focusing on the neediest is more effective. Middle-income families can explore other options.
7. **Exceptional Circumstances:**
- **Agree:** Families facing exceptional circumstances (e.g., remote areas, disabilities) should receive discounts. Flexibility is crucial.
  - **Disagree:** Some argue that exceptions create complexity and administrative challenges.

Fifty-two comments were received from respondents who strongly disagree, disagree, or somewhat disagree were about...

1. **Support for Free Transport:**
- **Low-income families:** Advocates argue that low-income families should receive free transport due to the reduction in welfare benefits over the past decade.
  - **Universal policy:** Some believe that transport to education facilities for 11-18 year-olds should be universally free, regardless of income.
  - **Equity:** Supporters emphasize that all children should receive the same discount or free transport, regardless of their family's financial situation.
  - **Parent's income:** A viewpoint suggests that parent's income should be irrelevant when providing this service.
2. **Opposition to Free Transport:**
- **Limited discount:** Some propose a limited discount rather than completely free transport.
  - **Tax contribution:** Critics argue that people in higher tax brackets contribute more to the tax take, making free transport for all less equitable.
  - **Cost implications:** Concerns are raised about the significant cost for families of all incomes, especially with a £400 increase.
3. **Personal Experiences:**
- **Working families:** Individuals who work but don't receive benefits express frustration at the lack of help despite financial struggles.
  - **Chronic illness:** A working parent with a chronic mental illness highlights their financial challenges after essential expenses.

- **Perceived inequality:** Some feel that non-working families benefit unfairly while working families bear the burden.
4. **Support for Equal Support:**
    - **Fairness for All:** Some argue that support should be available to all students, irrespective of their background or their parents' financial circumstances. They emphasize that everyone should have equal access to education-related services.
    - **Minimal Cost:** Advocates propose that transport should either be free or have a minimal cost for all students attending further education within their catchment area. They highlight that education is compulsory until age 18 and should be facilitated by accessible transport services.
  5. **Challenges for All Families:**
    - **Equal Bus Costs:** It's pointed out that the cost of using public transportation is the same for everyone, regardless of income. Thus, it doesn't automatically cost less just because someone is on a low income.
    - **Financial Struggles:** Families across different income levels are facing increasing financial difficulties. Some argue that those not classified as low income also need support.
  6. **Incentives and Means Testing:**
    - **Existing Incentives:** There are already incentives for low-income families to participate in education, such as free school meals. However, some question why families not classified as low income should fund those who are.
    - **Means Testing:** The current system is based purely on work income and does not consider other financial responsibilities. For instance, some working parents support multiple children, including those in university.
  7. **Proposed Rises and Affordability:**
    - **Proposed Rise:** The proposed increase in costs for non-low-income families might be an attempt to cover the lack of contribution from low-income families. However, this can be challenging for families who are not classified as low income but still face financial constraints.
  8. **Equity and Responsibility:**
    - Some argue that providing free or discounted transport to low-income families is essential for equity. They emphasize that just because a family isn't classified as low income doesn't mean they can necessarily afford the proposed £1000 yearly cost.
    - There's a viewpoint that having children is a lifestyle choice, and parents should take more responsibility. Additionally, children over 16 should become more independent.
  9. **Universal Free Transport:**
    - Advocates for universal free transport believe that all children, regardless of income, should receive this service. Education is valued by society, and there shouldn't be a need to claim discounts.
  10. **Struggles Beyond Low Income:**
    - Families earning around £35,000 express that they still struggle financially despite not being classified as low income. They argue that free transport should be available to everyone.
  11. **Fairness and Circumstances:**
    - While some insist on parents paying, there should still be exceptions based on individual circumstances.
    - The proposed price increase is seen as demanding for families across all income levels. A consistent discount policy is essential.
    -

One comment was provided by respondents who selected 'no opinion' or chose not to select an answer. They commented that "2 parent family working and receive no benefits can mean worse off financially as the cost of outgoings is full whack with no exemption"

Three respondents did not answer but chose to provide comment that are summarised as -

1. **Equitable Access for All Students:**
  - It's unfair when some students pay while others don't due to their parents' jobs.
  - Equal access ensures that everyone has the same opportunities.
2. **Post-16 Education and Transport Costs:**
  - If education is compulsory until 18, transport costs should be provided.
  - This consistency ensures that all students can continue their education.
3. **Removing Barriers and Supporting Aspirations:**
  - No one should face financial barriers to education.
  - Education is a pathway to future opportunities.

### 3.3 Increase the use of Personal Travel Budgets

A Personal Travel Budget (PTB) applies to those eligible for travel assistance and is paid either termly or monthly for parents/carers to use to ensure their child/young adult gets to and from their school or other further education in a way that meets the family's needs.

The Council currently provides a PTB when requested by the parent or carer as long as it is a better use of Council resources. The PTB is worked out based on:

- The special educational needs and disabilities of the student
- The distance and time of the journey to school or other further education
- If they can travel alone
- If any specialist equipment is needed

The standard amount that can be paid under a PTB is £0.45 per mile for the cost of two return journeys for each day of attendance, however this can be increased where the actual cost incurred by the parent or carer is more than this, and where it represents value for money for the Council. Each case will be considered on its own merits and the value of the PTB will be agreed with the parent or carer.

**The proposal is to make a PTB the first offer instead of the Council providing transport, where it is better value for money for the Council.**

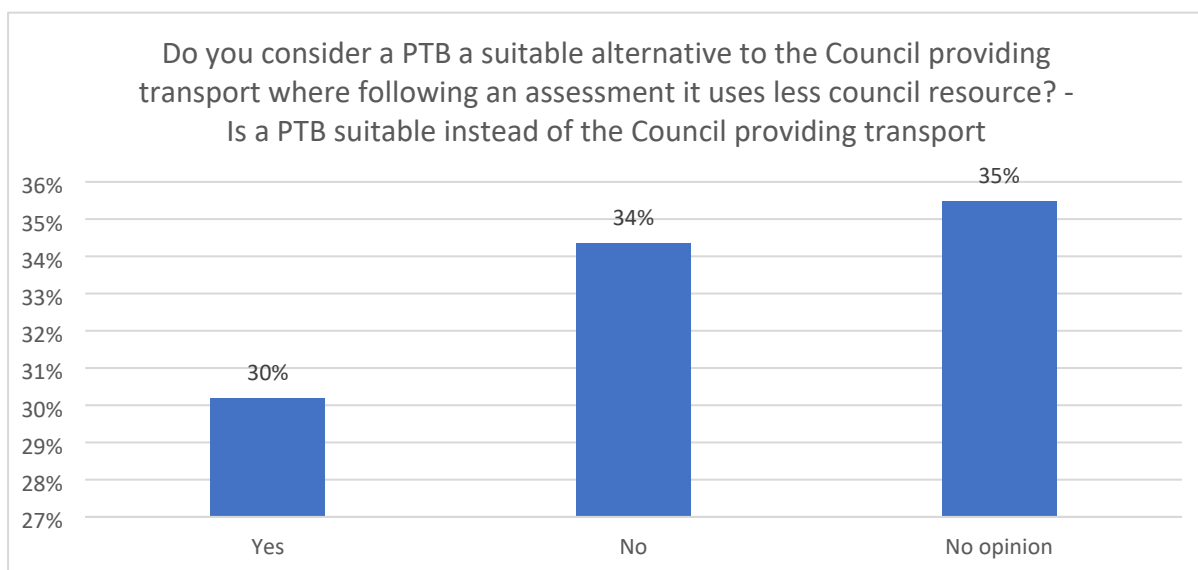
Respondents were asked what extent they agreed or disagreed that a PTB is a suitable alternative to the Council providing transport.

#### **Table 11, Do you consider a PTB a suitable alternative to the Council providing transport ?**

626 chose to answer this question.

<b>Response</b>	<b>Count</b>	<b>Per cent (%)</b>
Yes	189	30
No	215	34
No opinion	222	35

**Chart 3**



Respondents were asked to provide any comments on the proposal that a PTB would be provided rather than transport by the Council. 186 chose to provide comment. 53 comments were received from those respondents who said yes. The following provides a summary of these comments:

1. **Cost-effectiveness:** Many respondents believe that PTB could be a cost-effective solution if it covers the true cost of a student getting to school and back, and if it is cheaper than other transport options.
2. **Suitability:** Some respondents highlight that PTB might not be suitable for all families, especially those with complex needs or those who live in areas with no public bus services. It should be assessed against the needs of the child and local factors.
3. **Workability:** Several respondents express concerns about the workability of PTB. They mention that it should be easy to understand and use, and it should not put pressure on families. If parents can't organise something, the council should provide transport instead.
4. **Alternatives:** Some respondents suggest alternatives such as schools and colleges having their own PTB transport, or a taxi service for those who can't drive or travel by bus.
5. **Special Educational Needs or Disability (SEND):** Some respondents specifically mention that PTB should be considered for children with SEND where use of standard transportation is not practicable.
6. **Administration:** A few respondents raise concerns about the administration of PTB. They question how much the assessment would cost and whether it would really save money.
7. **Eligibility:** Some respondents believe that more people should be eligible for PTB, while others express concerns that only those on benefits would benefit.
8. **Personal Choice:** Some respondents see PTB as offering personal choice to families.
9. **Council's Role:** Some respondents believe that the council should be more business-minded and fund the most cost-efficient provision. They also suggest that the council should provide transport if PTB is not suitable or if parents can't organise something.

10. **Unknowns:** Some respondents admit they do not have enough knowledge about PTB and would like more information.

Twenty-one respondents said that they have no opinion but gave comments summarised below:

1. **Economic Impact:** Some respondents express concern about the financial burden this policy could place on parents, particularly if it restricts their ability to work elsewhere due to transport responsibilities.
2. **Fairness:** There are concerns about the fairness of the policy, particularly in relation to the costs for different families and the potential for the policy to be applied selectively.
3. **Practicality:** Some respondents question the practicality of the policy, particularly for families with children at different schools or for those without the means to transport their children.
4. **Policy Administration:** There are concerns about how the policy will be administered and the potential costs of this administration.
5. **Need for Flexibility:** Many respondents suggest that the policy should be applied flexibly and on a case-by-case basis.
6. **Council Responsibility:** Some respondents believe that the council should fully fund transport, without parents having to consider budgets.
7. **Lack of Understanding:** A few respondents express a lack of understanding about the policy and its potential financial impact on them.
8. **Need for Consultation:** Some respondents call for more consultation with parents and carers on what would be suitable.

The majority of the 110 comments received for respondents who said no to this question were about...

1. **Concerns about feasibility:** Many respondents mention the difficulty of parents transporting their children to school due to work commitments, lack of a car, or living in a remote location with poor public transport links.
2. **Financial implications:** There are worries about the cost of petrol, the financial burden on families, and the potential for fraudulent claims. Some suggest that the proposed system of means testing would cost more to administer than the current system.
3. **Environmental impact:** Several responses highlight the potential increase in pollution and traffic congestion if more parents are driving their children to school.
4. **Safety and suitability:** Some respondents express concern about the safety of vulnerable children, especially those with special educational needs and disabilities (SEND). They question who would assess the suitability of each young person for independent travel.
5. **Equality and fairness:** There are calls for all children to have equal access to transport, regardless of their needs or family income. Some respondents feel that the proposal unfairly benefits certain groups over others.
6. **Council responsibilities:** Many responses criticize the council for not considering residents' situations and for potentially wasting resources. They argue that the council has a duty to provide safe, efficient transport and to support SEND children.
7. **Alternative suggestions:** Some respondents propose alternatives, such as providing a dedicated, affordable school bus, offering an interest-free payment

option for travel costs, or giving students a bus pass. They argue that these solutions would be more practical, cost-effective, and environmentally friendly.

8. **Council's Decision:** The council is criticized for being short-sighted and not proactive in their decision-making.
9. **Increased Traffic:** The reduction in services could lead to increased traffic during school pick-up and drop-off times, which is already a challenge. There are also concerns about the environmental impact of this increased traffic.
10. **Access to Education:** There is a strong belief that access to education should be free and that the council should provide suitable transport services, especially in areas where public transport is limited or non-existent during school times.
11. **Cost Implications:** Concerns are raised about the financial burden on families, particularly those who might not be able to afford alternative transport options. There is a call for the council to increase the amount allocated for these services.
12. **Discrimination:** There is a perception that the decision unfairly benefits certain groups at the expense of others, leading to increased education opportunity access for those groups.
13. **Responsibility of the Council:** The council is seen as having a responsibility to provide this service, with tax money being suggested as a potential source of funding.
14. **Questioning the Calculation:** The calculation of costs for students is questioned, with a specific example given of the charge for Silverstone students. The text asks how the council can justify charging £1000 per school year to parents when their own calculations suggest a much lower cost.

### **3.4 Personal Travel Budget (PTB) for Sole Transport**

In certain cases, it may be appropriate to provide a PTB, for those assessed as eligible for travel assistance, to students to travel on their own. This could be because the student lives in a rural area where no other students need transport, or they could have a high medical need and need to be transported on their own.

The Council currently provides a PTB for sole transport when this is requested by the parent or carer and where it represents a more efficient use of Council resources.

Where sole transport is needed, travel assistance will be limited to the provision of a Personal Travel Budget unless in exceptional circumstances. This is because sole transport is often the most expensive transport for the Council to arrange and can often be sourced by parents or carers at a lower cost.

In exceptional circumstances where it is not possible for parents or carers to provide transport themselves or source suitable arrangements, then transport will be provided by the Council.

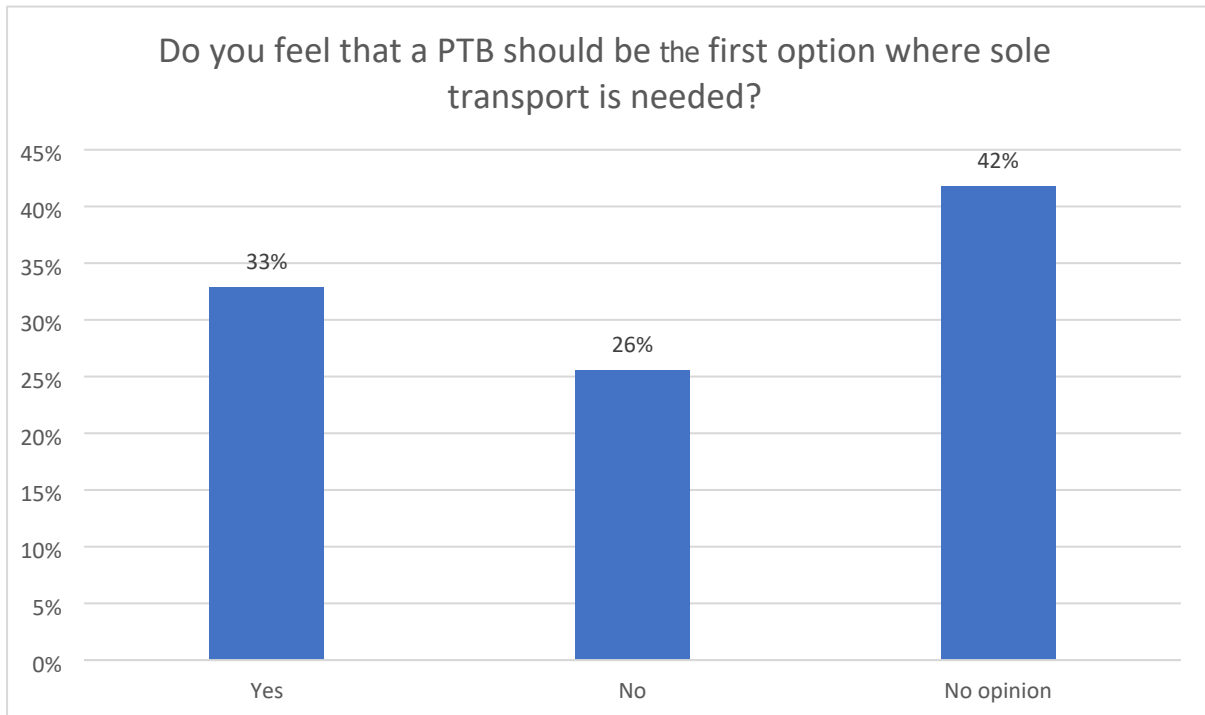
**The proposal is to make a PTB the first offer instead of the Council providing transport, where it is better value for money for the Council.**

603 chose to answer this question.

#### **Table 12**

Response	Count	Per cent (%)
Yes	198	30
No	154	34
No opinion	252	35

**Chart 3**



Respondents were asked to provide any comments on the proposal that a PTB should be the first option where sole transport is needed. 258 chose to provide comments. 35 comments were received from those respondents who said yes. The following provides a summary of these comments:

1. **Necessity of Transport:** There's a consensus that children and young adults need to be able to get to their educational needs, and this needs to be provided one way or another.
2. **Support for Families:** Clear individual assessment and support for families to source transport is essential, as it can alleviate the stress and burden on parents, especially those in rural areas where taxi services may be scarce.
3. **Consideration of Needs:** The requirement for trained/escort staff should be considered on a case-by-case basis, and arrangements should be appropriate to the needs of the student and their parents.
4. **Access to Learning:** All children should have access to learning, and barriers should not be put in their way. This includes considering the cost of transport and ensuring it is affordable.
5. **Exceptional Circumstances:** Some believe that transport should be provided in exceptional circumstances only, while others argue for more relaxed eligibility criteria.
6. **Parental Responsibility:** There are differing views on parental responsibility, with some arguing that parents should be responsible for their children's transport, especially if they are not low income.



7. **Rural Considerations:** Those living in rural areas or remote locations, where public transport may be non-existent, express a particular need for transport provision.
8. **Discrimination:** There's a strong sentiment that no youngster should be discriminated against their right to education, and creative ways to support their education should be explored.

Seventeen respondents said that they have no opinion but gave comments summarised below:

1. **Equality:** The respondents believe that budget, discounts, and facilities should be equal regardless of disability, ability, or income. The council should allocate the budget and transport subsidy equally among all students.
2. **Lack of Information:** Some respondents express that they can't answer certain questions due to a lack of information about how personal budgets can be used for transport.
3. **Dependent on Circumstances:** Many responses indicate that decisions should depend on individual circumstances and family situations. There isn't a one-size-fits-all solution.
4. **Parent/Carer Consultation:** The council should support whatever the parents/carers deem to be in the best interest of their child. Parents and carers should be consulted on what they feel would benefit them.
5. **Case-by-Case Review:** Solutions should be reviewed on a case-by-case basis, not as a default position.
6. **Transport Options:** Some suggest options like taxis or a Personal Transport Budget (PTB), but also note that these might work in some circumstances but not others.
7. **Uncertainty:** Some respondents are unsure how certain measures would impact or benefit their children.

The majority of the 41 comments received for respondents who said no to this question were about...

1. **Barrier to Learning:** School transport issues are seen as a barrier to learning. Concerns are raised about potential abuse and fraud in the system.
2. **Parental Choice:** Respondents believe parents should have the choice in deciding the mode of transport for their children. There is a consensus against having a first or second option imposed.
3. **Cost and Accessibility:** The cost of school transport, especially in rural areas, is considered outrageous. There is a strong call for free school transport for all students.
4. **Efficiency and Safety:** The idea of sole transport for one child is criticized for being inefficient and potentially unsafe. The preference is for multiple children to be transported together to the same place or transport link.
5. **Council Responsibility:** There is a strong belief that the council should pay for all students to access their educational setting, irrespective of their additional needs. The council is also expected to arrange and pay for the transport due to safeguarding concerns.
6. **Case-by-Case Review:** Many respondents suggest that decisions should be made on a case-by-case basis, considering the unique circumstances of each student and their family.

7. **Government Role:** If the government wants children to stay in education until they are 18, then it should make suitable provision for them to do so, regardless of where they live or their personal household financial status.
8. **Special Needs Consideration:** All options need to be looked at for students, especially those with high medical needs or other complex and physical needs. This includes the need for more medical training for Transport Assistants.
9. **Resource Utilization:** There is a concern about the unnecessary waste of resources in the current system. The use of public funds for one child travelling to a specialist school is questioned.
10. **Safeguarding:** There are concerns about support and safeguarding for vulnerable children, especially when considering options like private car hire or taxis.

### 3.5 Support for young adults undertaking an apprenticeship

The current policy makes no provision for travel assistance to young adults aged 16-19 undertaking an apprenticeship.

Providing the student is eligible for free travel assistance under the existing criteria; **The Council’s proposal is to offer support by way of a Personal Travel Budget to the education setting however in exceptional circumstances transport may be provided by the Council.**

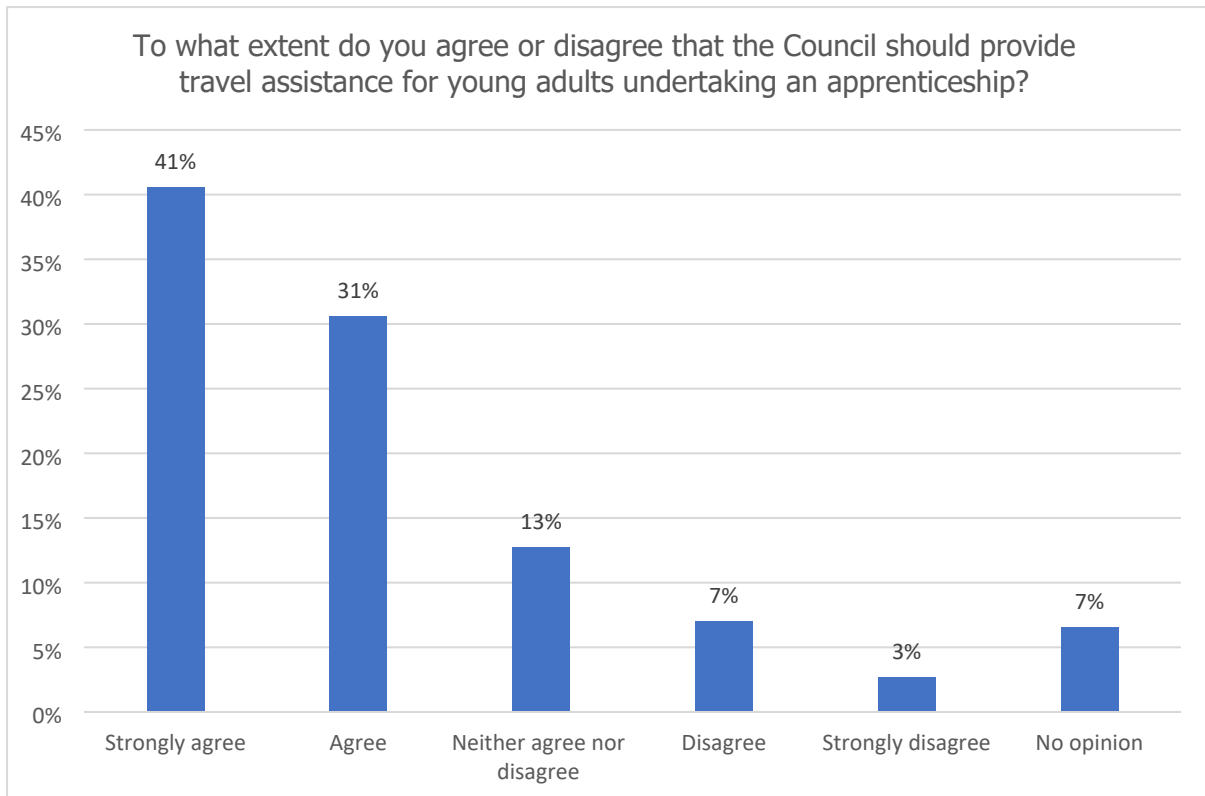
Exceptional circumstances are where it is not possible for the parent/carer to arrange or provide transport themselves. Travel assistance will not be provided to the workplace setting.

Respondents were asked to what extent they agree or disagree with the proposal to increase the annual fee for the discretionary provision for non-entitled school travel assistance to help meet the cost of providing the service. There were 599 responses to this question with 426 stating they strongly agreed or agreed, and 58 strongly disagreed or disagreed.

**Table 13, To what extent do you agree or disagree that the Council should provide travel assistance for young adults undertaking an apprenticeship?**

<b>Response</b>	<b>Count</b>	<b>Per cent (%)</b>
Strongly agree	243	41
Agree	183	31
Neither agree nor disagree	76	13
Disagree	42	7
Strongly disagree	16	3
No opinion	39	7

#### Chart 4



Respondents were asked to provide any comments on the proposal to provide travel assistance for young adults undertaking an apprenticeship. 185 chose to provide comment. 130 comments were received from those respondents who said they agreed strongly or agreed. The following provides a summary of these comments:

1. **Mandatory Education:** Since education or training is compulsory until the age of 18, it's argued that support should be provided to enable attendance.
2. **Equal Opportunities:** Many believe that all forms of education, including apprenticeships, should be equally supported. This includes providing transport assistance regardless of whether the student is in a traditional academic setting or an apprenticeship.
3. **Financial Considerations:** Given the low wages typically associated with apprenticeships, many feel that expecting these individuals to bear the full cost of transportation is unfair. Some suggest that discounts or subsidies should be provided.
4. **Rural Accessibility:** For those living in rural areas with limited public transport, the need for transportation assistance is particularly acute.
5. **Investment in the Future:** Several comments highlight the importance of viewing such support as an investment in the future workforce, rather than a drain on current resources.
6. **Special Needs:** Some comments mention the specific needs of students with disabilities or special educational needs, arguing that these individuals may require additional support to access workplace settings.
7. **Inequity in Current Support:** There's a perception of unfairness in the current system, with some students receiving more support than others. This is seen as particularly problematic given the government's push for more vocational training and apprenticeships.

Eighteen respondents who said that they neither agree nor disagree provided comments that

1. **Individual Circumstances:** The decision should be based on individual circumstances, including whether the apprenticeship is paid or voluntary.
2. **Employer Responsibility:** Some believe that employers who hire apprentices should cover their transport costs.
3. **Local Authority Support:** Others suggest that paid apprenticeships should see less support from local authority budgets.
4. **Income-Based Contribution:** If the apprenticeship is a paid learning route, a contribution could be offered based on the income.
5. **Parental Responsibility:** Some argue that parents or carers should arrange transport for their children, especially if the apprenticeship is part of a school program.
6. **Equality Among Students:** All families should be treated the same, irrespective of whether they are attending school or an apprenticeship.
7. **Consideration During Application:** Parents and students should consider transport when applying for a college or apprenticeship.
8. **Universal Assistance:** If assistance is provided to apprentices, it should be extended to all students aged 16-18.

Thirty-three comments were received for respondents who strongly disagree or disagree:

1. **Apprentices Should Pay:** Many believe that since apprentices are paid, they should be responsible for their own transport costs. This includes using public transport, driving, or arranging rides with parents. Some argue that paying for transport is part of the transition into the working environment.
2. **Employers Should Contribute:** Some suggest that employers, who benefit from the apprentice's work, should contribute to transport costs. This could be a part of the apprenticeship agreement.
3. **Council Support:** A few respondents feel that council funds should prioritize full-time students who have no income, rather than apprentices who earn a wage. However, others argue that if free transport is provided to college, it should also be provided to the workplace.
4. **Equality with Students:** Some respondents believe that apprentices should not be treated differently from students taking A-levels or other courses. If the apprentice is over 18 and earning, they could be asked for a small contribution, otherwise, transport should be free.
5. **Parents' Role:** Some parents feel they should not have to fund transport for other people's children. They believe parents should make provisions for their own children's transport.
6. **Logistical Considerations:** A few respondents point out that providing transport for apprenticeships can be logistically inefficient compared to school runs, as apprentices are not traveling en masse to the same location.

Four comments were received from respondents that had no opinion or did not answer the question:

1. **Employers:** there should be provision for young people on an apprenticeship to receive travel cost assistance if their employer or training provider does not offer this.

### 3.6 Transport only for normal start and finish times

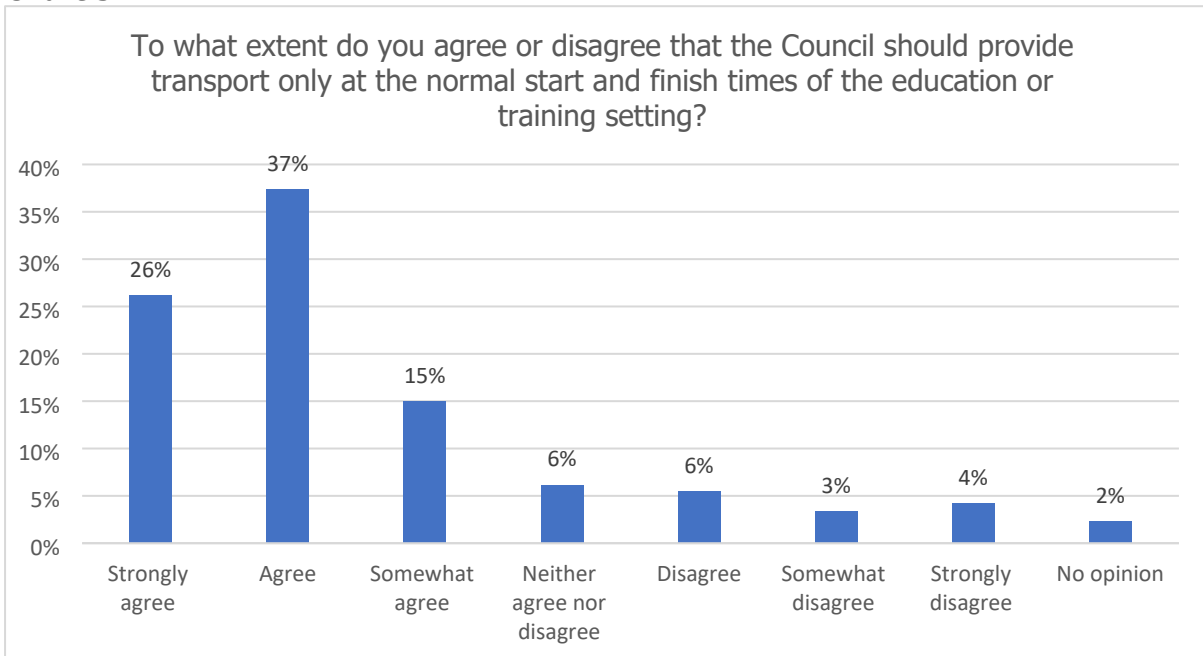
The current policy explains that all transport for Post-16's will be provided at the beginning and end of each day during term time only, unless there are exceptional circumstances. This allows the Council to plan and co-ordinate transport efficiently. The proposal is to keep this arrangement and the Council will review the timings at the start of each academic year.

**Table 14, To what extent do you agree or disagree that the Council should provide transport only at the normal start and finish times of the education or training setting.**

600 respondents chose to answer this question.

Response	Count	Per cent (%)
Strongly agree	157	26
Agree	224	37
Somewhat agree	90	15
Neither agree nor disagree	37	6
Disagree	33	6
Somewhat disagree	20	3
Strongly disagree	24	4
No opinion	14	2

**Chart 5**



Respondents were asked to provide any comments on the proposal to provide transport at the normal start and finish times of education or training. 135 chose to provide comment. 83 comments were received from those respondents who said they agreed strongly, agreed, or somewhat agreed. The following provides a summary of these comments:

1. **Timetables:** Majority agree that transport should be provided at the start and end of the school day, aligning with the school's timetable. A few respondents suggest that these cases might require more flexible transport times.
2. **Extra-curricular activities:** Concerns are raised about the impact on students' participation in extra-curricular activities. Some suggest that transport should be flexible to accommodate extra-curricular activities. Others argue that extra-curricular activities are optional, and parents should arrange transport in these cases.
3. **Provision by educational establishments:** Some respondents suggest that schools and colleges could provide their own transport.
4. **Multiple provisions:** Some respondents express concerns about the cost of providing transport at multiple times.

Eight respondents who said that they neither agree nor disagree provided comments that:

1. **Extra-curricular activities:** The impact of limited extracurricular opportunities for children from low-income families on their mental health, university choices, employment opportunities, and social mobility.
2. **Assessments:** The need for a proper assessment of the cost-effectiveness of multiple buses.
3. Uncertainty about the effect of these transportation changes on higher education timetables.
4. **Out-of-hours transport:** The disadvantage faced by students who lack resources for transportation outside of normal school hours.
5. **Extension and funding:** The possibility of slightly extending the transportation times, depending on available funds. The wish for the Council to be more generous despite economic reasons.
6. **Majority rules:** The belief that transportation should be provided for the majority start and end times of students.
7. **Assumptions:** The assumption that this was already the case.

Forty-four comments were received for respondents who strongly disagree, disagree, or somewhat disagree:

1. **Limited Participation in Extra-Curricular Activities:** The lack of flexible transportation options limits students' ability to participate in after-school activities, enrichment activities, and extra-curricular support.
2. **Challenges for SEN Children and Disabled Parents:** SEN children often need reduced hours, which can happen without much notice, leaving parents stuck if they work. The system seems to discriminate against disabled parents who are unable to drive, affecting their child's extracurricular education.
3. **Impact on Education and Well-being:** Students may miss out on important enrichment to school life beyond academic lessons due to the lack of transport offered outside of school hours. This could impact their grades and overall well-being.
4. **Need for Flexibility:** The transport provision needs to be appropriately timed to not limit the educational opportunities of the young person. There should be availability when students come back from excursions with school, and there should be an option to come home earlier if the day is done.

5. **Concerns for Post-16 Education:** Post-16 arrangements are not so simply timetabled. Some students will absent themselves if they have little tuition timetabled on a particular day leading to lower participation and completion rates.
6. **Cost Concerns:** If parents are paying for a pass, there should be more services provided to justify the cost. Providing transport only at start and end of day effectively ensures that children can't participate in extra curriculum activities due to cost.
7. **Suggestions for Improvement:** Suggestions include challenging the disability bus pass parameters, providing free bus passes for children between the ages of 11 and 16 attending secondary education, and putting on later buses to allow students to attend extra-curricular after-school activities.

### 3.7 Further comments

Respondents were invited to provide further views or comments on the Post-16 Transport Policy, that they had not already told us about. There were 164 comments that make up the following summary.

1. **Financial Burden:** Many respondents highlight the financial strain the increase would cause, especially for families already struggling with living costs. The proposed increase is seen as unaffordable and discriminatory against lower-income families and those living in rural areas. Some suggest a smaller increase or a staggered increase over several years. The increase in charges could prohibit some children from attending school, as families are already struggling with the cost of living and do not have additional income to cover these costs.
2. **Educational Access:** Respondents argue that the increase could deter students from pursuing further education, contradicting the mandate for post-16 education. They suggest that the government should subsidize these costs.
3. **Transport Quality:** Concerns are raised about the quality of transport services, with calls for regular checks and reviews. Some respondents also suggest alternatives like pay-on-the-day options or personal transport budgets for adults over 25.
4. **Policy Criticisms:** The consultation process is criticized as a 'tick box exercise', with fears that negative feedback will be ignored. Respondents also express frustration at the perceived lack of support for students with additional needs.
5. **Long-term Impact:** Some respondents argue that the policy is short-sighted, potentially leading to higher costs in the future due to reduced access to education. They advocate for investment in education and transport as a means to support future economic growth.
6. **Payment Flexibility:** There are calls for more flexible payment options, such as direct debit payments in instalments from the start of September, instead of a large bill in January.
7. **Equality:** Respondents believe that transport subsidies should be allocated equally among all students, regardless of disability, ability, or income. They also suggest that transport availability should not change just because students turn 16.
8. **Alternatives:** Suggestions include 'pay as you go' options, discounts for families with multiple children in further education, and only usable bus passes at relevant times of the day.
9. **Environmental Impact:** There are worries about increased traffic and pollution if more parents resort to driving their children to school due to the cost increase.
10. **Council Responsibility:** Some comments question the council's decision-making process, asking for full cost breakdowns and suggesting that the increase is a form

of tax. There's a call for the council to consider the wider impact of the increase on families and communities.

11. **Lack of Alternatives:** There is a poor bus service serving local villages, and there are no alternative transport options, especially for students who need to travel to colleges outside their local area.
12. **Communication and Consultation:** There is criticism of the lack of direct communication about the price increase, and a call for face-to-face consultation due to digital poverty.
13. **Government Responsibility:** Some comments argue that the government or schools should cover the cost of transport, as education is compulsory for students up to the age of 18.

The last question sought detail about how the respondent heard about the consultation. There were 576 responses to this question, and respondents could choose more than one answer. The most prevalent method of hearing about the consultation was from schools or other education provider (347), followed by social media (145), 17 from a WN Councillor, via an e-mail alert from their local council (25), 15 via the WN E-newsletter, from local media e.g. newspaper or radio (14), 6 respondents are members of the WN Consultation Register, a school transport provider (5), 1 respondent found out as a member of the WN Residents Panel, and 1 via a voluntary sector organisation.

#### **4 Written responses**

There were 6 written responses received by email from parents. The following provides an overview of the written comments provided in this way.

- Requests for additional information on Personal Budgets
- The choice is being taken away from children, young people, parents, and carers which will impact on education, general health, mental health, and wellbeing.
- The cost of proposals is too much, not proportionate to inflation.
- The proposals will detrimentally impact working parents/carers who cannot afford to pay the increased buss pass and will therefore have to drop their working hours to take their children to and from school/college.
- The price increase will create a barrier to education for young people.
- As young people now must stay in education till 18, free transport should be provided.

#### **5 Feedback from consultation events**

There were 2 drop-in sessions arranged at Guilsborough Academy which were attended by approx. 11 parents in total. The feedback from parents has been recorded separately with the responses consistent with that received via the online questionnaire.

End of report



# West Northamptonshire Council

## Post 16 Education Transport

### September 2024 - July 2025

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Changes</b>
<b>V 01</b>	Head of Transport	April 2020	Review & Date Changes
<b>V 02</b>	Head of Transport	April 2021	Review & Date Changes
<b>V 03</b>	Head of Transport Delivery	October 2022	Review, Date Change, Update Local Authority
<b>V 04</b>	Head of Transport Delivery	August 2023	Date Change
<b>V 05D</b>	Head of Transport Delivery	January 2024	Draft for Consultation
<b>V 06D</b>	Head of Transport Delivery	January 2024	Final legal review ready for consultation
<b>V 07</b>	Head of Transport Delivery	April 2024	Final Version

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## 1. Introduction

This policy statement sets out the support West Northamptonshire Council considers necessary to facilitate the attendance of students of sixth form age and young adult learners, receiving education or training.

The overarching principle of the Policy Statement is to support and help facilitate attendance to accredited programs of learning including those which are funded by the Council and which lead to positive outcomes.

## 2. Legal and policy framework

The requirements placed on a local authority are defined in the Education Act 1996 (as amended), Education and Skills Act 2008, Education and Inspections Act 2006, Apprenticeships, Skills, Children and Learning Act 2009 and the Equality Act 2010. These Acts require that:

- (1) A local authority shall prepare for each academic year a transport policy statement.
- (2) The statement shall specify the arrangements for the provision of transport or otherwise that the authority consider it necessary to make for facilitating the attendance of persons of sixth form age, receiving education or training at:
  - (a) A school
  - (b) A college of further education
  - (c) An authority maintained or assisted institution providing further education
  - (d) An establishment supported by the Education Funding Agency
  - (e) A learning provider funded by the authority to deliver accredited programs of learning which lead to a positive outcome.
- (3) This requires the authority to have regard to the need to include sufficient information in their transport statement and the need to publish the statement in good time, so that young people and their parents are able to take account of these matters when choosing an establishment.
- (4) The Statement shall specify the arrangements that the authority consider it necessary to make for the provision of financial assistance in respect of the reasonable travelling expenses of persons of sixth form age, receiving education or training at any establishment such as is mentioned in subsection (2).
- (5) The Statement shall also provide information about the travel provision put in place for young adult learners aged 19 – 25 in respect of whom the authority

have carried out a learning difficulty assessment (LDA) or have issued an Education, Health and Care (EHC) plan.

The Department for Education Statutory Guidance 'Post-16 Transport and Travel Support to Education and Training (January 2019)' advises that local authorities should not differentiate between providers or institutions in the arrangements it provides to support students in facilitating their attendance in education or training. In preparing this Policy Statement, West Northamptonshire Council ('The Authority') is mindful of the new requirements under the Education and Skills Act 2008, which are as follows:

### **Raising the Participation Age**

From 2015 all young people are required to continue in learning or training until the end of the academic year in which they turn 18.

Raising the participation age (RPA) does not mean that young people must stay in school; they will be able to have one of the following choices:

- Full-time education, such as school, FE college or home education
- Apprenticeships, work-based learning
- Part-time education or training if they are employed, self-employed or volunteering for at least 20 hours a week

### **Sustainable Transport**

Section 508A of the Education Act places a general duty on local authorities to promote the use of sustainable travel and transport. The duty applies to young people of sixth form age who travel to receive education or training in a local authority's area.

The Council is keen to ensure that as many young people as possible can plan their travel arrangements so they can access their school, college or training provider by using sustainable ways of travel.

To promote sustainable travel, the Council has a dedicated website providing advice and support to help families and young people plan their travel to places of learning. This website can be accessed via the following link:

<https://www.smartmovenorthamptonshire.net/journey-planners>

The Council's Active Travel Strategy is being developed and will outline our approach and future plans to increase sustainable travel for all, including scholars and young adults attending education or training. The Strategy is expected to be available in the Autumn of 2024.

The Council will also work with schools, colleges and other training establishments to support them in running their own home to school/college transport arrangements, and to develop programs which support the Council's strategy to increase independent travel.

### 3. Scope

Whilst there is no legal duty to provide free travel assistance to all post-16 students, the support offered under this policy acknowledged that the Authority needs to support all young people, including those from low income families and those with learning difficulties and/or disabilities.

The Authority has established a Transport Partnership in which the key stakeholders involved in the provision of education or training for students aged 16 or over, work collaboratively in supporting students and their travel assistance.

### 4. The Principles of the 2024 – 2025 Post 16 Transport Policy

#### **Students of sixth-form age**

This is defined as being a person receiving education or training at an establishment and he/she is over compulsory school age (5- 16) but is under the age of 19 or has begun a particular course at the establishment before attaining the age of 19 and continues to attend that course.

The principles in which the policy is founded remain broadly the same as in previous years and are set out below and include the requirement for entitled students to make a contribution towards their travel assistance.

The arrangements under this policy are that parents/carers of all students who are entitled to travel assistance, contribute £1,000 per academic year towards the costs of their travel assistance. Where a student qualifies under grounds of low income then the contribution will be reduced by 50% (£500). This charging structure will apply to all students whether attending mainstream or special/specialist post-16 education provision, independent schools or FE colleges and other suitable training establishments.

Where a student qualifies on grounds of low income and who also has a learning difficulty or disability, which necessitates the need for travel assistance, then travel assistance will be provided free of charge to their nearest suitable setting named in Part I of their Education Health and Care Plan. In the case where a student does not have a EHCP, but does have a special educational need or disability, the nearest suitable setting will be agreed with the Council. Where the student is attending a setting which is deemed parental preference, the parent or carer will be required to pay the £1,000 contribution in full.

Flexible payment options will be available to all parents and carers allowing up to 12 months in which to pay the contribution. Details of the payment schemes available will be provided at the point travel assistance is confirmed.

The policy also includes greater emphasis on the provision of Personal Travel Budgets (PTB's) where this represents a suitable alternative to Council provided transport. Further information on PTB's can be found in the section titled "Personal Travel Budgets" on page 11.

In cases where there are 2 or more siblings within a household who are both in Post-16 education and who are entitled to travel assistance under this policy, then the parental contribution will be reduced by 50% for each additional sibling.

The Authority will, in the first instance, consider the use of a Personal Travel Budget (PTB) whereby the parent or carer will be reimbursed for the cost associated with arranging their own transport or for transporting the student themselves. The value of the PTB will reflect the actual cost less the parental contribution and more information is available on page 11 of this policy.

The Authority will also take into account receipt of 16 – 19 bursary funding in assessing an individual's need for financial help with travel assistance. Where a person receives a benefit to facilitate their mobility needs (e.g. Disability Living Allowance, where this includes the higher rate mobility element) the Authority may explore whether this can be used to support their transport needs to and from education or training for which a mileage rate will be paid. Each case will be considered on its own merits.

Please note that support for Post 16 students will cease at the end of the academic year during which the individual turns 19 years of age.

Students of sixth form age must be enrolled on a full-time education course, scheduled to provide at least 540 hours of guided learning annually. Exceptional circumstances will be considered where a student has, for example, had to take a break in learning due to medical needs and is unable to meet the minimum number of study hours.

The Authority does not provide travel assistance for part-time courses; higher education; or non-state funded education, unless agreed and arranged by the Authority.

Where a school/college or parent have been making their own transport arrangements, the Authority will not agree to pay these costs retrospectively.

## 5. Young adult learners, aged 19 – 25 subject to an Education, Health and Care plan

Please note that this policy does not relate to young adults who are not in education or training and who do not have an Education, Health and Care plan. Information about travel assistance for other young adults can be obtained from the Authority's Adult Social Care Transport policy.

Whilst the Authority would continue to encourage the participation in education and training by persons who are over compulsory school age but under 19 and persons aged 19 – 25 with an EHC plan, young adult learners would be expected to meet the cost of travel between home and the provider at which they are receiving education or training except in the circumstances as follows:

1. Free travel assistance will be provided to a young adult learner aged 19 – 25 with an EHC plan, where the Authority has secured the provision of education

or training and the provision of boarding accommodation. Free travel assistance will only be provided where it is considered necessary to facilitate that person's attendance at the place of education or training.

2. Free travel assistance may be provided where an adult learner is receiving education or training at an establishment maintained or assisted by the Authority and providing Further Education, or at a College of Further Education, and the Authority considered that:
  - (a) the person's attendance on that course is reasonably necessary; and
  - (b) it was necessary for the Authority to provide transport to facilitate that person's attendance on the course.

In deciding whether it is necessary for the Authority to provide free travel assistance for an adult learner, the Authority will amongst other things, have regard to:

- the learner's age, ability and aptitude
- any learning difficulties the person may have
- the locations and times at which the education or training is provided
- the nature of the route, or alternative routes, which the learner could reasonably be expected to take.

For the purposes of deciding whether to provide free travel assistance the Authority would not consider it necessary, other than in exceptional circumstances, for a young adult learner to attend an additional Further Education course at the same level or equivalent where the learner had previously attended and completed a course at an establishment within the Further Education sector. Each case will be considered on its own merit.

## 6. Apprenticeships

Young persons of sixth form age (16-19) with learning difficulties and/or disabilities who are undertaking a formal apprenticeship can apply for travel assistance to their nearest suitable educational setting where this is named in Part I of the young person's EHCP. Eligibility for travel assistance will be subject to the same criteria as that for other students attending school or college set out in this policy. No provision of travel assistance will be provided to a young person to and from their paid work placement.

## 7. Eligibility criteria for support

Students may be entitled to receive appropriate support providing the distance between their home address and nearest suitable place of study is more than 3 miles. The distance between a student's home and place of study will be measured by the shortest available walking route (see the Council's Walking Route Criteria published on the Council's website <https://www.westnorthants.gov.uk/school-travel-assistance/safer-routes-school>)

Students who live within 3 miles of their nearest or designated school, college or nearest training provider will not normally receive travel assistance unless there are

exceptional circumstances which mean the student is unable to travel independently or with assistance from a parent, guardian or carer. Consideration will be given by the Authority to the nature of a student's learning difficulty and/or disability on a case by case basis. Wherever possible, independent travel will be promoted for all students including students with learning difficulties and/or disabilities.

Travel assistance will normally only be provided to the student's nearest or designated school, suitable college or training provider. Consideration may be given to an alternative setting where a student or their parent, guardian or carer expresses a wish for an alternative school, FE college or training provider on the grounds of religion or belief, where this is the closest provision.

The travel assistance that will be available for eligible students is one return journey home to their main place of study at the normal start and finish times of the school day, and during term time only. These standard times will be reviewed annually and where a particular course timetable does not correspond with the drop off and pick up times of transport, parents or carers will be expected to make arrangements to drop off or collect their child. Alternatively parents or carers should make arrangements with the education or training provider to ensure their child is adequately supervised if required.

Educational settings will be expected to demonstrate why they are not able to supervise the student and will be expected to work with the Council to identify the most suitable arrangements to meet the needs of the student and ensure efficient use of Council resources.

Students and their families will retain the right to a formal appeal should they either be declined travel assistance or where they feel the travel solution being offered is not suitable for their child.

Students using transport services funded as part of this policy may be expected to make their way to the nearest pick up point up to 1 mile away from the home address or destination unless the route is not deemed suitable or cannot reasonably be undertaken due to a student's learning difficulty and/or disability. The definition of a suitable route will be the same as that used in determining suitable routes of children of statutory school age. More information regarding suitable walking routes can be found on the following link:

<https://cms.westnorthants.gov.uk/media/7907/download>

All students eligible for travel assistance under this policy and who live over 3 miles from their place of study can apply for a grant for the provision of a bicycle (including a small maintenance allowance) for the primary purpose of travelling to and from their place of study. Students who successfully apply and receive this grant will be deemed to have been provided with satisfactory travel solution for the entire duration of their course. Cycle training will be provided, where requested.

The Authority will administer the policy in conjunction with schools, FE colleges and training providers and will ensure that it does not differentiate between institutions and providers.



A scheme offering independent travel training to students with learning difficulties and/or disabilities is being developed working in conjunction with parents, students, schools, FE colleges and training providers.

Parents, guardians or carers of eligible students will be encouraged to provide transport for which a mileage allowance will be payable. Where a person receives a benefit to facilitate their mobility needs (e.g. Disability Living Allowance, where this includes the higher rate mobility element), there is an expectation that this benefit is used by the family to assist the students attendance at school or college.

The partners of this policy recognise that it is the parents' and/or students' responsibility for ensuring attendance at a school, FE college or training provider.

If a student plans to attend/is attending one of the FE colleges in West Northamptonshire, the student must make a travel assistance application directly to the FE College.

An exception is made for those students with an EHCP who are attending Tresham College and all students attending FE Colleges which are outside of Northamptonshire's administrative boundary. These students must apply to Transport Services by using the [application form](#) on the West Northamptonshire Council website.

It is acknowledged that the FE colleges already invest significant resources in providing post-16 travel assistance alongside the Authority's contribution.

## 8. How the charging scheme works for students of sixth form age

Reductions in the charging scheme for students who are eligible for travel assistance are determined as follows:

### **Low income**

Student must:

- i. reside within West Northamptonshire
- ii. reside more than 3 miles from their nearest suitable educational establishment or training provider; and
- iii. have parents/legal guardian (or who are themselves) in receipt of one of the following benefits:
  - Income Support
  - Income based Job Seekers Allowance
  - Income related Employment and Support Allowance
  - Support under Part VI of the Immigration and Asylum Act 1999
  - Child Tax Credit, with no element of Working Tax Credit, and a household income below £16,190pa (as assessed by HM Revenue and Customs)
  - Maximum level Working Tax Credit
  - Guarantee Element of State Pension Credit

- Universal Credit (provided families have an annual net earned income of no more than £7,400, as confirmed by earnings from up to the three most recent assessment periods).

Low income criteria for travel assistance will be reviewed annually and adjusted in accordance with any changes to the criteria issued by Government.

### **Students with Learning difficulties and/or disabilities**

Student must:

- i. reside within West Northamptonshire;
- ii. have an Education, Health and Care plan, or have a special educational need or disability which is supported by relevant and appropriate professional advice.
- iii. reside more than 3 miles from their nearest suitable educational establishment or training provider or for students living under this distance, the need for travel assistance will be assessed according to the students' learning needs and/or disabilities.
- iv. be attending their nearest suitable school, FE college or training provider.

## **9. Type of support/mode of travel offered for students**

The travel assistance provided under this policy is specifically for students who meet the Authority's eligibility criteria. This does not however restrict individual schemes, which enhance and complement the scope of this policy, being introduced by individual schools, colleges or training establishments.

The type of assistance provided will depend on the individual circumstances of the student, which will be assessed by the Authority, school, FE college or training provider. Where it is feasible and provides suitable transport arrangements to meet the student's needs, the Authority will in the first instance offer a Personal Travel Budget.

A Personal Travel Budget will be the Council's default offering for students where sole transport is the only available transport solution, unless in exceptional circumstances where it is not possible for parents or carers to provide transport themselves or source suitable arrangements. In these circumstances travel assistance will be provided by the Council.

The Authority will undertake regular reviews of the decisions made by FE colleges to award travel assistance to students who are eligible under this policy to ensure compliance with the policy and that decisions are consistent across all education and training establishments.

## **10. Personal Travel Budgets (PTB)**

Where the young person qualifies for travel assistance under this policy, they may be entitled to a PTB. Having a PTB provides a parent or carer the freedom to make decisions and arrangements about how their young person will get to and from school, college or other training provision each day.

The following are examples where a PTB can be used:

- Pay towards the running costs of your own vehicle
- Arrange your own locally sourced transport
- Pay friends/family to take your young person to school
- Pay for childcare for a younger sibling allowing you to take your other young person to school
- Purchase bikes for your young person
- Pay for someone to walk your young person to school or college, or their siblings where it allows you to transport.
- Buy a travel pass for your young person to use public transport
- Buy a travel pass for your other child so they can get to school while you transport your young person with SEND.

The benefits for parents and carers in having a PTB rather than transport arranged by the Council or College are summarised below:

- Fixed regular payments - you always know what you will receive
- Freedom and flexibility to choose the most appropriate travel assistance, to fit with your own personal circumstances
- Greater control over the services or resources you would like to support your young person's needs
- Total flexibility on where and when your young person is picked up e.g. if you want your young person to attend an after-school/college club or go to a grandparent's/carer's after college
- Opportunity to use the PTB to develop your young person's independence around travel and develop independence skills using public transport (where appropriate)

If a young person meets the criteria for a PTB then the Authority will consider if a PTB provides the most efficient use of resources, and where this is the case can be arranged at short notice.

Where a PTB is not cost effective or is unsuitable to meet the needs of the young person, then travel assistance will be offered via an alternative means.

Where a PTB is in place, this will be reviewed annually in consultation with the parent. If changes are required or the PTB is no longer the most efficient use of resource, the Authority will endeavour to provide as much notice as possible of any changes to the travel assistance offered.

The value of the PTB will be based on the actual costs incurred in transporting the young learner to and from their place of study, less the parental contribution required under this policy. The parental contribution will however be waived where the cost of the PTB is at least £1,000 less than the cost of the authority providing transport.

The Authority reserves the right to withdraw the provision of a PTB at any time and parents and carers will retain the right to formally appeal any decision by the Authority to change or alter the provision of travel assistance offered.

The Authority is currently working with Northamptonshire FE colleges to allow all FE college students to use Council contracted school services, where the service could broadly meet the journey requirements of the student.

## 11. Public Bus and Rail Services

Where a student is entitled to travel assistance and their journey can reasonably be accommodated using existing public bus or rail, then the student will be expected to pay up to the first £1,000 in accordance with the outcome of their low income assessment, learning difficulties and/or disabilities entitlement.

The cost of the pass will also vary due to the number of different public transport providers operating throughout West Northamptonshire and the individual journey requirement of the student. The Authority is working to secure fair and consistent pricing for student bus passes.

Further Education colleges themselves operate subsidised transport schemes and students are advised to contact the FE colleges directly to identify what additional support may be available.

## 12. Other Transport Provision

Where public transport is not available, or the student is unable to use public transport due to a learning difficulty or disability, then it may be necessary to provide a taxi to accommodate a student's journey to and from school or college. In such cases the parent or carer will be expected to pay up to the first £1,000 in accordance with the outcome of their low income assessment, learning difficulties and/or disabilities entitlement.

Where a school or FE college arranges the transport for students, they will be expected to use the Authority's Framework Agreements in the procurement of transport and ensure that where appropriate, the provision of a taxi is shared with other entitled students.

Parents or carers of students who are entitled to travel assistance under this policy will be encouraged to provide transport for which a mileage allowance will be paid. Where a student is in receipt of the higher rate mobility component of the Disability Living Allowance then this may be used to transport the student to and from school or FE College.

## 13. Students with Learning Difficulties and/or Disabilities

Students with an EHC plan, will be assessed on their travel assistance entitlement by the Authority or the FE College. Other students who do not have an EHC plan but

who require specialist or adapted transport will be considered by the school, FE college or training provider in agreement with the Authority.

Decisions/recommendations will be made in accordance with the legal framework and statutory guidance for post-16 transport provision. Suitable travel arrangements will then be provided to address the needs of entitled students.

Some FE colleges already operate an independent travel training programme for students with learning difficulties or disabilities. Whilst each programme will differ slightly, the Authority would wish to develop a comprehensive programme across Northamptonshire working in partnership with education establishments to introduce training during the final 2 years of a student's statutory education prior to commencing their further education.

## 14. Out of West Northamptonshire Area Education Provision

Travel assistance for out of area placements will apply in cases where the educational needs of a student with learning difficulties and/or disabilities cannot be addressed within West Northamptonshire. Entitlement to travel assistance will be subject to this being identified by the Authority as the nearest suitable setting.

Students attending an alternative school through personal preference or choice will not receive travel assistance.

Attendance at out of West Northamptonshire education establishments may include weekly or termly boarding and hence the transport arrangements for each student will vary accordingly. In such cases, the scheduling of transport will be agreed with the school, FE college or training provider, in conjunction with the parents/carers or young person and within the terms of the EHCP.

## 15. Applying for post-16 travel assistance

To apply for travel assistance to a school, or Tresham College, the [application forms](#) are now available on the West Northamptonshire Council website. If you are applying for travel assistance to Northampton College or Moulton College, you will need to apply to the college direct. It is the responsibility of the parent(s)/guardian(s)/carer(s) and student to obtain an application form and apply for travel assistance. Parents or carers must apply for travel assistance each academic year.

To be guaranteed travel assistance, the closing date for post 16 applications is on or before the **31<sup>st</sup> May prior to the September of that academic year.**

Any applications received after this deadline are considered late and may not be processed until the October half term and will be provided subject to available capacity. Please ensure that you have alternative arrangements in place during this time. West Northamptonshire Council will not be responsible for any travel costs incurred during this time.

Completed applications received before by the deadline will guarantee travel assistance for the whole of the next academic year, subject to eligibility.

Completed applications received after the last working day in May will not guarantee travel assistance for the whole of the next academic year.

FE Colleges or training providers may have their own arrangements and contact should be made with them initially to discuss this.

## 16. Appeal procedures

Parents/guardians/carers or a young person are entitled to challenge the decision of the Authority to refuse to provide travel assistance as set out in this policy or when the parents/guardians/carers or young person consider that the travel arrangements, agreed by the Authority, are unsuitable.

A decision may be challenged on the following grounds:

- eligibility
- distance measurement; and/or
- safety of the route
- transport arrangements offered

Please note that there is no right to challenge a decision made by the Authority, where a child's/young person's entitlement to transport assistance has been removed either temporarily or permanently on the grounds of unacceptable behaviour. What is unacceptable behaviour. List examples, but not limited to and state it will be assessment on case by case basis.

Full details can be found on the Council's website on the [appeals procedure](#) for home to school transport.

## 17. Work of the Transport Partnership

West Northamptonshire's Post-16 Transport Partnership brings together key partners in Northamptonshire who work collaboratively on the Post 16 Transport Policy statement and to develop innovative and appropriate travel solutions to enable access to further education and training courses for this age group.

We intend to deliver an Independent Travel Education Programme aimed at improving travel independence for Post 16 students (often with learning difficulties and/or disabilities) to enable access to college and special school by travelling on public transport independently.

## 18. College Information

Below is a brief summary from each of the Northamptonshire Colleges. Students, Parents or Carers should contact the colleges directly as the information below :

### **Northampton College**

Northampton College offer subsidised bus passes where a student is eligible as per the NCC criteria (under 19, more than 3 miles from site of study, on a full-time course) Students can apply to the bursary for transport support where there is a household income below £26,000 or income based benefits

Northampton College sell stagecoach bus passes for use on public bus services. Bus number 16 travels every 10 minutes between Northampton bus station and Northampton College.

Contact phone number for all 3 sites: 01604 734258

Email: [student.services@northamptoncollege.ac.uk](mailto:student.services@northamptoncollege.ac.uk)

### **Moulton College**

Moulton College operates a comprehensive subsidised transport network throughout Northamptonshire, allowing students access to the main college and all of its outcentres.

Moulton College: 01604 491131

Information can be found on Moulton College website for their [transport and travel costs](#)

### **Tresham College**

Mainstream students should apply directly to the college when making their college application.

Students with an EHCP should apply for Post 16 Transport arrangements using the [application form](#) on the West Northamptonshire Council's website.

Tresham College may offer additional support to learners through their Learner Support Fund subject to meeting the eligibility criteria

Tresham College: 0845 6588990 – select campus required

Email: [info@tresham.ac.uk](mailto:info@tresham.ac.uk)

## **19. Public Transport Information**

National TraveLine: 0870 608 2608

Information can be found on TraveLine Website for their [timetables or bus routes](#).

Stagecoach East: 01604 676060/ 0870 608 2608

Information can be found on Stagecoach East website for their [timetables or bus routes](#).

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# WEST NORTHAMPTONSHIRE COUNCIL

## CABINET

7<sup>th</sup> MAY 2024

### CABINET MEMBER FOR ENVIRONMENT, TRANSPORT, HIGHWAYS AND WASTE SERVICES: COUNCILLOR PHIL LARRATT

Report Title	Procurement of a Contract for the Operation and Maintenance of Gayton Closed Landfill – Leachate Treatment Plant
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Report Author	Fiona Unett, AD Waste <a href="mailto:Fiona.unett@westnorthants.gov.uk">Fiona.unett@westnorthants.gov.uk</a>
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#### List of Approvers

Monitoring Officer	Catherine Whitehead	10/04/2024
Chief Finance Officer (S.151)	Martin Henry	10/04/2024
Executive Director Place, Economy and Environment	Stuart Timmiss	27/10/2024
Communications Lead/Head of Communications	Becky Hutson	10/04/2024

#### List of Appendices

##### Appendix A – Plan of Gayton Closed Landfill

#### 1. Purpose of Report

- 1.1. The purpose of the report is to secure approval to commence procurement of a contract to support West Northamptonshire Council in its long-term project of remediation, restoration and aftercare of Gayton Closed Landfill. The Contract is for the Operation and Maintenance of Gayton

Closed Landfill – Leachate Treatment Plant (LTP), which will replace the existing contract that expires 30 September 2024.

- 1.2. To secure delegated authority to made decisions associated with the procurements and to award a contract at the conclusion of the procurement process.

## **2. Executive Summary**

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- 2.1 West Northamptonshire Council is responsible for the management of historic closed landfills which are classed as contaminated land (Part 2A the Contaminated Land Regime and the Environmental Protection Act 1990). Gayton closed landfill is classified as contaminated land under this legislation.
- 2.2 There is an on-site leachate treatment plant at Gayton closed landfill which intercepts and treats leachate from the site and prevents uncontrolled discharge, thereby mitigating and reducing the risks that the site may otherwise present. This leachate treatment plant is managed by an operation and maintenance contractor in accordance with the Environment Agency’s required standards.
- 2.3 The current contract is due to expire on 30 September 2024 and it is proposed that a new contract is procured to commence on 1 October 2024 to ensure the Council’s statutory duties continue to be fulfilled.
- 2.4 It is proposed that the new contract specification will be similar in scope to the current contract. A competitive procurement process will be completed to secure the contract, which will enable the Council to achieve best value for money. The estimated financial implications of the new contract have been included in the Council’s medium term financial plan.

## **3. Recommendations**

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- 3.1 It is recommended that the Cabinet:
  - a) Approve the commencement of procurement for a new contract for the Operation and Maintenance of Gayton Closed Landfill – Leachate Treatment Plant (LTP).
  - b) Agree to delegate authority to the Executive Director for Place, Economy and Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste Services to:
    - i) Finalise the specification for the contract; and
    - ii) Take decisions related to the procurement processes, to enable them to progress as planned; and
    - iii) Award the contract, provided the procurement reaches a satisfactory conclusion.

#### **4. Reason for Recommendations**

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- 4.1 To ensure the Council continues to proactively manage environmental emissions from Gayton closed landfill using a qualified and technically experienced operator, in order to be compliant with the associated discharge consent.
- 4.2 To ensure the Council fulfils its statutory duties for the remediation, restoration and aftercare of contaminated land required by the Environmental Protection Act 1990 and Part 2A the Contaminated Land Regime.
- 4.3 To ensure a compliant procurement process can be completed prior to the expiry of the existing contract, with new arrangements delivering value for money as a result of following a competitive procurement process.

#### **5. Report Background**

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##### **History of Gayton Closed Landfill**

- 5.1 West Northamptonshire Council (WNC) has the environmental liability for Gayton closed landfill located at National Grid Reference SP715552. The site is roughly triangular in shape and occupies an area of approximately 12 hectares. Access is from Milton Road to the east of the site. The Grand Union Canal forms the northern boundary and a cutting for the main west coast rail line the southwestern boundary. Milton Road forms the third boundary on the southeastern side of the landfill.
- 5.2 The eastern part of the site was purchased in 1938 by Northampton Rural District Council for use as a refuse tip. Northamptonshire County Council assumed responsibility for site in 1974 and the site closed in 1988 when it was returned to pasture. The western part of the site is not owned by NCC and was operated under a lease. There is an estimated 800,000 m<sup>3</sup> of mainly domestic and commercial waste within the site. The site was designated as Contaminated Land by predecessor authority South Northamptonshire Council.
- 5.3 The surface of the closed landfill is domed at up to 16 m above the level of the adjacent canal. Surrounding land use is agricultural. The nearest dwelling is approximately 100 m from the closed landfill, on the other side of the railway cutting.

##### **Statutory Responsibility for Closed Landfills**

- 5.4 West Northamptonshire Council has a number of historic closed landfills which have been 'inherited' due to changes in Local Government Regulations. The Council has liabilities and responsibilities for the management of historic closed landfills which are classed as contaminated land (Part 2A the Contaminated Land Regime and the Environmental Protection Act 1990). The Council is required to investigate, identify, manage and mitigate identified pollution linkages from these sites and where appropriate disconnect these linkages in line with remediation plans.

- 5.5 As a consequence, these historic closed landfill sites require both routine and non-routine environmental monitoring, ongoing management and inspection and site maintenance of systems and infrastructure.

### **Management of Gayton Closed Landfill**

- 5.6 As noted above, Gayton closed landfill slopes towards the canal and therefore there is a risk of uncontrolled drainage of leachate into the canal. To mitigate this risk there is a leachate treatment plant installed on site, which is part of a number of proactive environmental management measures which include remedial works, restoration and long term after care.
- 5.7 The leachate treatment plant was originally constructed in 2001 and has undergone several upgrades to increase both the capacity, efficiency and effectiveness of treatment. The leachate treatment plant operates well within all consent parameters and provides the Council with the most environmentally and economical viable way to manage leachate from Gayton closed landfill.
- 5.8 Treated landfill leachate is discharged under gravity to an un-named tributary of the Gayton Arm of the Wootton Brook. This is under a formal discharge consent with the Environment Agency (No PRNNF12093).
- 5.9 Under the conditions of the consent, the Council proactively monitors the closed landfill site and the treatment processes at the leachate treatment plant along with compliance testing of the discharge. The robust maintenance and monitoring protocols and quality assurance systems show that the leachate treatment plant is operating effectively and the leachate discharged is well within the consent parameters.
- 5.10 Under current contract arrangements, on a continual basis (24 hours a day, 7 days a week) the leachate treatment plant is monitored remotely and if an issue is detected, a technically competent person attends the site in person. From time to time, the leachate treatment plant requires maintenance to ensure it treats leachate to the required standards. This 'operation and maintenance' contract is due to expire 30 September 2024 and therefore it is proposed that a new contract is procured in order to maintain the safe and effective operation of the leachate treatment plant.

### **Proposed Procurement**

- 5.11 It is proposed to procure a new contract for the operation and maintenance of the leachate treatment plant at Gayton Closed landfill. Gayton is the only closed landfill in West Northamptonshire which has a leachate treatment plan, so there are no economies of scale to be gained from including other sites. Therefore, the specification for the contract will be similar to the current specification, taking into account any lessons learnt from these arrangements.

- 5.12 The proposed contract length is 5 years with the option of a possible extension of 2 years, which will allow the council good value for money and a consistent contractor.
- 5.13 The proposed procurement will commence in June and a competitive open procedure will be followed, with contract award planned for end of August/early September.
- 5.14 The outcome of the procurement process will be a technically experienced operator appointed to operate and maintain the leachate treatment plant from 1 October 2024.

## **6. Issues and Choices**

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- 6.1 The current contract for the operation and maintenance of the leachate treatment plant at Gayton has been extended to its maximum length. Therefore, to “do nothing” is not an option: a new contract must be procured in accordance with procurement regulations.
- 6.2 The Council has other contracts for the management of the closed landfills that it has responsibility for, but the operation and maintenance of the leachate treatment plant requires a specialist contractor and it is unlikely there would be a benefit in packaging this contract with other requirements.
- 6.3 The option to operate the leachate treatment plant using WNC officers has been considered. However, the operation and maintenance of the treatment system is a very specialist service and WNC officers do not have the required skillset or capacity (bearing in mind the 24/7 monitoring).
- 6.4 Another option for managing leachate from this site is to remove it via road tanker for treatment at a suitably environmentally permitted Treatment Works and cease to operate the leachate treatment plant. However, this option would be much more expensive than the current system (during peak flows approximately 5 HGVs per day may be required) and also require capital investment in the site roadways to ensure HGVs can access the site.
- 6.5 An Equalities Assessment Screening Form has been completed and this has not identified that there are any equalities impacts that require further action.

## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

- 7.1.1 The estimated cost of the new contract is included within existing budgets and the medium term financial planning process.
- 7.1.2 The contract length will be 5 years with the potential for an extension of up to two years, which is expected to secure the Council best value.
- 7.1.3 No additional officer resources are required to procure or manage the contract.

## 7.2 Legal

- 7.2.1 Under the Environmental Protection Act 1990, Part 2A, there is a system for identifying and remediating land that has been designated as contaminated land. This legislation also provides a risk-based approach to the identification and remediation of land and under this legislation, Gayton closed landfill has been designated as contaminated land. Section 78N, Environmental Protection Act 1990, Part 2A, grants the Council power to do what is appropriate by way of remediation to the relevant land or waters.
- 7.2.2 Consequently, the Council is following a risk based approach to for the management and remediation of this site, because it has an on-going statutory duty to manage the risks associated with Gayton closed landfill and it would be responsible for any pollution incident resulting from uncontrolled discharge of the leachate. The proposed procurement of a contract for the operation and maintenance of the leachate treatment plant will mitigate and reduce the risks so far as reasonably practicable by securing suitable technically competent operators.
- 7.2.3 There are no property implications applicable with this proposal.
- 7.2.4 Due to the estimated contract values, fully compliant, above threshold tender processes are required following the Cabinet decision. The proposed value of this contract will exceed the procurement threshold (currently £214,904 inclusive of VAT) and consequently, the Council must ensure that the procurement process complies with the Public Contracts Regulations (2015) (“PCRs (2015)”). The procurement will be subject to Procurement Gateway Group approval prior to commencement and the proposed approach will be an open procurement.
- 7.2.5 The Council’s legal and procurement teams will be involved in the procurement and award of the proposed new contract to ensure compliance with its Contract Procedure Rules (CPRs) and procedures. This includes, ensuring that the contract and any legal agreement arising from the matter described in this report is in a form approved by Legal Services on behalf of the Director of Law and Governance.
- 7.2.6 It is proposed that the Executive Director Place, Economy and Environment in consultation with the Portfolio Holder for Environment, Transport, Highways and Waste Services have delegated authority to make decisions relating to this procurement.

## 7.3 Risk

### 7.3.1 The key risks are:

	<b>Risk</b>	<b>Mitigation</b>
i.	The current contract for the Operation and Maintenance (O&M) of Gayton Closed Landfill Leachate Treatment Plant may expire prior to procuring new	Secure new arrangements to replace existing contracts as per proposals within this paper.

	arrangements and the Council will not be able to fulfil its statutory duties.	
ii.	New arrangements will not be in place prior to the expiry of existing contracts due to a delay in the procurement programme.	The programme to secure new arrangements will be rigorously managed and delegation of associated decisions will ensure timely decisions.
iii.	The new arrangements will be more expensive than the current arrangements.	<p>The existing contract for O&amp;M services Gayton Closed Landfill LTP was procured more than 4 years ago by the predecessor authority. The existing contract did not have any inflationary indices included and was a fixed cost over the life of the contract.</p> <p>The extraordinary inflation in recent years means it is likely there will be a step change in the costs of this service.</p> <p>Industry feedback is inflation should be included in the new contract, otherwise there is a risk that the contract won't be attractive to the market or that the risk will be priced into the tendered price.</p> <p>It is expected that a longer length contract will mitigate price uplift along with a mechanism for inflationary pressures.</p> <p>Procurement will be competitive and will aim to secure best value services.</p> <p>An increase in the costs of this contract has been estimated and included in the 24-25 medium term financial planning process.</p>

#### 7.4 Consultation and Communications

7.4.1 There is no requirement for consultation. The proposal is procurement of a new contract to replace an existing service contract. The systems and technology are part of the site's

infrastructure and the Council's requirement is for a replacement Operation and Maintenance Service Provider.

7.4.2 The communications team will share the outcome of the Cabinet meeting and the necessary next steps via the Council's communications channels to reassure residents of the Council's commitment to continue to manage the risks posed from its historic, closed landfills. By procuring this contract, the Council will ensure it remains compliant with the formal discharge consent parameters.

## 7.5 **Consideration by Overview and Scrutiny**

7.5.1 This contract has not been considered by Overview and Scrutiny committee.

## 7.6 **Climate Impact**

7.6.1 The Council take a proactive approach to manage the environmental impact and risks posed from legacy waste operations and the resultant closed landfill sites. The proposed contract forms part of the Council's ongoing commitment to remediate, restore and provide long-term aftercare of Gayton Closed Landfill.

7.6.2 The Council's investment in the on-site Gayton closed landfill leachate treatment plant ensures that leachate is consistently and sufficiently treated to a high standard (as required by the Discharge Consent).

7.6.3 Treating landfill leachate on-site and discharge via a formal consent with the Environment Agency limits carbon emissions compared with other options for managing the removal of excess landfill leachate. This is because the alternative option would be to use multiple HGV tankers to transport the leachate from site and treat it at a suitable environmentally permitted Treatment Facility (for example a foul water treatment works).

## 7.7 **Community Impact**

7.7.1 There is limited community impact from the closed landfill or on-site leachate treatment plant. The leachate treatment plant (LTP) was constructed in the early 2000's to manage and mitigate leachate build up within the site and to stop uncontrolled emissions. Using the leachate treatment plant, landfill leachate is comprehensively treated and discharged under an Environment Agency consent.

7.7.2 The location of the leachate treatment plant is well within the site boundary and cannot be seen by the local community/residents. The closed landfill itself is fully restored to grassland.

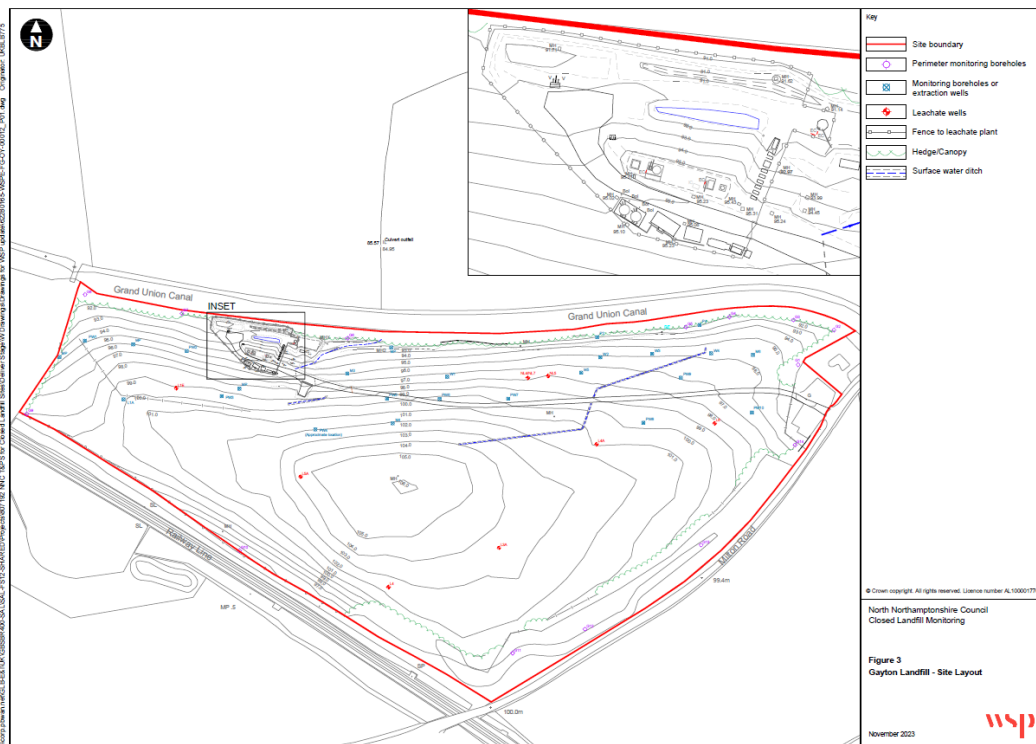
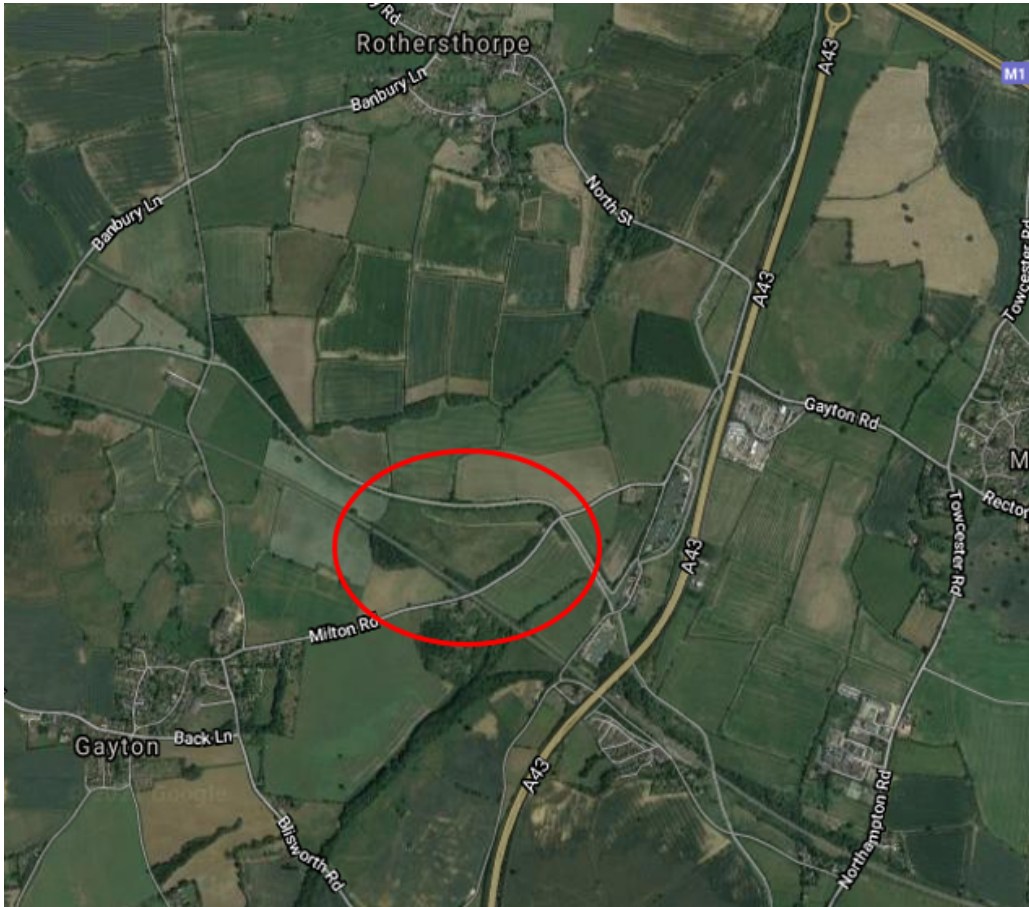
## 8. **Background Papers**

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8.1 None



# Appendix A – Plan of Gayton Closed Landfill



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# WEST NORTHAMPTONSHIRE COUNCIL

## CABINET

7<sup>th</sup> MAY 2024

### CABINET MEMBER RESPONSIBLE FOR CHILDREN, FAMILIES, EDUCATION AND SKILLS: COUNCILLOR FIONA BAKER

Report Title	Procurement and Implementation of WNC Education Services Case Management System
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#### List of Approvers

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Chief Finance Officer (S.151)	Martin Henry	16/04/2024
Executive Director of People Services	Stuart Lackenby	16/04/2024
Head of Communications	Becky Hutson	16/04/2024

#### List of Appendices

None

#### 1. Purpose of Report

- 1.1. The Council's current contract with Capita One for its Case Management System (CMS) for Education Services ends on 31 March 2026. The purpose of this report is to seek approval from cabinet to proceed with the procurement of a new contract and the implementation of an Education Services CMS for the Council in readiness for the existing contracts end date.

#### 2. Executive Summary

- 2.1. The Council requires an effective and efficient technology solution for case management across Education Services (as described in 5.4), to enable the service to deliver against the council's statutory duties, ensuring children are given the best start in life and vulnerable children are supported and protected.

- 2.2. The current system in use is Capita One Education which was initially procured by Northamptonshire County Council before Local Government Reform and the formation of WNC. A report to cabinet in September 2023 provided approval to extend the current contract to 31 March 2026 to enable the service to have sufficient time to set out the current and future requirements for the system.
- 2.3. The Council has contracted with Capita as a single provider for this CMS for a significant period, therefore a comprehensive procurement exercise is required to ensure that the Council is able to implement a system which enables both best practice and value for money.
- 2.4. Due to the scale and significance of this system, it is intended that procurement of a replacement solution is commenced during Q1 of 2024/25 to ensure adequate time is available to engage the market, undertake the procurement process, and support system redesign and implementation in readiness for 1 April 2026.
- 2.5. This report outlines the approach and estimated costs associated with procuring and implementing a new CMS contract for a four-year period with an ability to extend for a further three years.
- 2.6. The cost of the proposed contract is estimated to be £2.1m over seven years, based on an annual system cost of £300k per year. A further one-off cost of £950k over a two-year period is also requested to support the redesign and implementation of system to support service transformation and efficiency.

### **3. Recommendations**

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- 3.1 It is recommended that the Cabinet:
  - a) Agrees to proceed with the procurement of a Case Management System for Education Services in WNC, at an estimated contract cost, including licences, hosting, and annual fees, of up to £300k per annum for up to seven years (totalling £2.1m).
  - b) Agrees to an additional estimated one-off funding of £950k to implement the Case Management System for Education Services, over a period of two years.
  - c) Delegates authority to the Executive Director of People Services, in liaison with the Executive Director of Finance and the Cabinet Member for Children, Families, Education and Skills, to take forward these recommendations to procure and implement the Case Management System and to utilise the most appropriate funding source for the implementation costs.

### **4. Reason for Recommendations**

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- 4.1 Procuring and implementing a new Case Management System will ensure The Council is able to meet the statutory obligations for delivering Children's Education Services with a system that is fit for purpose and reflects the needs of the Council and families across West Northamptonshire.
- 4.2 The proposal will enable the Council to conduct a procurement exercise, in compliance with procurement and contract procedure rules, and implement a Case Management System that is

available on the market from a supplier that has proven experience and knowledge of the Education Services delivered by local authorities.

- 4.3 The redesign of the system will support the services wider programme of transformation enabling efficiencies to be generated alongside more effective use of data.

## 5. Report Background

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- 5.1 During August 2020 Northamptonshire County Council awarded a contract to Capita Business Services (Capita) for the provision of an Education Services Case Management System (Capita One Education SaaS). The term of the contract ran to March 2021 with extension options until available through to March 2024.

- 5.2 In December 2020, the contract was varied to support local government reform with North Northamptonshire Council (NNC) as lead authority. The contract was also extended to March 2024. At this time work also commenced to split the databases into NNC and WNC instances and moved to a Cloud-hosted solution in line with the Council's Digital, Technology, and Innovation (DTI) strategy.

- 5.3 Ahead of the contract end date in March 2024, Cabinet approval in September 2023, enabled a further extension to Capita to continue system provision until 31 March 2026.

- 5.4 Engagement has commenced with Education Services, Procurement, Legal and DTI to address the needs of the service to ensure a suitable CMS continues to be in place after March 2026. Currently the CMS supports the delivery of statutory and non-statutory duties of the following staff and teams:

- School Admissions and Place Planning
  - Appeals
- Education Health & Care Team
- SEND Support Service
- Sensory Impairment Service
- Virtual School
- School Attendance Support Service
  - Attendance
  - Attainment
  - Penalty Notices
  - Exclusions
  - Elective Home Education
  - Children Missing in Education
  - Children in Entertainment & Employment
  - Education for Children Out of School (e.g., those with medical conditions that prevent school attendance)
- Educational Psychology Service
- Early Education & Childcare Advisory Services
- Family Information Services/Directory
- Free School Meals
- Home to School Transport

- Governors & Clerks

5.5 Processes are currently being mapped to understand the use of the system across the service, which will be used to better understand service requirements and as a baseline for future service improvements.

5.6 The current system is also supplemented using spreadsheets across the services above which create data quality challenges, duplication, and poor reporting capabilities.

## **6. Issues and Choices**

---

6.1 The following options have been considered, with Option 2 identified as the preferred option:

6.1.1 Option 1: Do Nothing – Not recommended.

This option would see the service undertaking no activity in relation of procurement of a replacement system for Education Services. Scope for improvements and efficiencies would be minimal. At the end of the current Capita contracting period (March 2026) there would be an option to extend the existing system contract for a minimum term of 3 years, this is a significant risk to the Council as this option could result in legal challenges from other suppliers.

6.1.2 Option 2: Conduct a procurement exercise for the Education Service Case Management System and implement a new solution – Recommended.

This option requires a competitive procurement process to be undertaken for the WNC Education Services Case Management System. The process would look at the current marketplace for these systems and then go through a process to ensure a solution that meets the requirements of DTI, and the service is found. The redesign and implementation would provide the opportunity to optimise the use of a system within the Services and to embed a new system ownership culture. This solution is supported by both Legal and Procurement.

6.1.3 Option 3: Use of an existing system – Not Recommended

This Option explores the use of systems within WNC to meet the needs of Education Services. There are no other systems currently in use in the Council that meets the requirements of Education Services.

## **7. Implications (including financial implications)**

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7.1 **Resources and Financial**

7.1.1 It is proposed that the new contract is awarded for four years with the ability to extend for a period of two years and an option to extend for a further one year at the end of the contract period (total contract period could be seven years).

7.1.2 The ongoing costs of the new system will be funded within the existing base budget of £300,000 currently held by the DTI Application Support Team.

- 7.1.3 However, to support the redesign and implementation of the system, one-off funding of £243,126 in 2024/25 and £707,503 in 2025/2026 is required.
- 7.1.4 This funding will be drawn from the Council’s risk reserve, however, if possible, alternative funding mechanisms such as capitalisation will be explored. The S151 Officer will ensure the most appropriate funding source is utilised.
- 7.1.5 Implementation will be delivered through a combination of internal and external capacity which is needed to ensure the new system meets the requirements of the expansive number of services that it will use. This resource will also support the data migration requirements.

	2024/25	2025/26
<b><u>One off implementation cost</u></b>		
Provider implementation costs	125,000	175,000
WNC implementation costs	118,126	532,503
<b>Total</b>	<b>243,126</b>	<b>707,503</b>

- 7.1.6 Estimated costs are similar systems projects within the Council and other Local Authorities. They have been reviewed by services involved in the project to provide assurance that these are fair estimates based on available and relevant information.
- 7.1.7 Similar redesign and implementation of Education CMS systems in other authorities have generated significant efficiencies through the removal of duplicate payments, system reporting and duplication of data entry.

## 7.2 Legal

- 7.2.1 The current system contract was awarded under the KCS Managed Services Framework for Businesses Solutions (Y20023). Whilst this enables an extension beyond the 31 March 2026, any further extension would be for a minimum term of three years.
- 7.2.2 The estimated value of the contract means that any procurement will be subject to the Public Contract Regulations 2015 and the Council’s Contract Procedure rules. The Council’s intention is to procure a Case Management System from an existing framework.

### 7.3 Risk

#### 7.3.1

Risk	Proposed Mitigation
Project timelines and completion dates not meeting contract end date of 31st March 2026 - requiring an extension to the existing contract.	Timeline to be fully planned out, with Education Services, DTI, Procurement, Legal and other enabling services both internally and externally are fully committed to delivering the new system.  Additionally, lessons learnt from similar projects (NCT Case Management System and ARISE) have been considered with amends to project approach made.
Internal staff are unavailable due to their existing and emerging workload or priorities for example EHC Waiting Lists, Ofsted Inspections, or other current systems projects.	Stakeholders to provide regular updates and assurance that project resources are fully committed to the delivery of the Project.  Measures taken ensure similar procurements with the same internal resource will not run at a similar time (staggered with ARISE and NCT CMS).  Consideration of school holidays in timescales.

### 7.4 Consultation and Communications

7.4.1 In developing the proposals, the Council has consulted with Education Services colleagues as the primary users of the current CMS. There has also been engagement with the Digital, Technology and Innovation Service and Business Intelligence Service. A communications plan is being developed to ensure all stakeholders will be kept informed and engaged at key stages of project implementation.

### 7.5 Consideration by Overview and Scrutiny

7.5.1 This decision has not been considered by the Scrutiny Committee.

### 7.6 Climate Impact

7.6.1 Once a solution has been selected specific impacts can be assessed. However, one of the potential benefits of a CMS is a retention if not reduction in levels of staff travel, post and associated printing that occurs within the services, potentially leading to a positive impact in this area.

### 7.7 Community Impact

7.7.1 Helping to ensure children and young people are fully engaged with their Education can lead to positive effects on communities. Timely interventions that are informed and enabled through data collated in an effective CMS will prevent escalating issues for families and a negative impact on local communities.



**8. Background Papers**

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8.1 None

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# WEST NORTHAMPTONSHIRE COUNCIL CABINET

16 APRIL 2024

## PORTFOLIO HOLDER FOR ECONOMIC DEVELOPMENT, TOWN CENTRE REGENERATION AND GROWTH: COUNCILLOR DAN LISTER

Report Title	Northampton Markets Development Plan
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Other Director	Stuart Timmiss, Executive Director Place, Economy & Environment	16/04/2024
Head of Communications	Becky Hutson	16/04/2024

### List of Appendices

#### Appendix A – Draft Markets Development Plan

##### 1. Purpose of Report

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- 1.1 To seek approval for a Development Plan for Northampton Markets and to propose a clear statement of the basis on which the Council operates its Northampton markets.

##### 2. Executive Summary

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- 2.1 Recognising the importance and timeliness of the newly regenerated Northampton Market Square, which will open later this year, a Northampton Markets Development Plan (the 'Plan')

has been prepared. This seeks to provide a clear future direction to the markets, supporting a vibrant and engaging Northampton town centre.

- 2.2 The Plan proposes measures to secure the quality and attractiveness of the regular markets, alongside creating new event and specialist markets, and programme of events. It seeks to assist the market traders from the existing market to make a successful transition to the 'new' markets.
- 2.3 It is proposed that the future operation of the market allows flexibility to respond to change in circumstances, trends and consumer demands; the ability to do this is a benefit of market operation. This is a key tool to address risks identified and to be addressed by the Plan.
- 2.4 Whilst inevitably difficult to predict, the Plan and modelling suggests that the net cost to the taxpayer of market operation would fall over time, reaching around break-even by 2029/30. The Plan however acknowledges the uncertainty involved in market operations; it is therefore proposed the financial implications are reviewed again once it is in operation and any necessary adjustments to the Council's financial planning be made then.
- 2.5 Alongside adopting the Plan, it is proposed the Council formally records the basis on which it operates its markets in Northampton.

### **3. Recommendations**

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- 3.1 It is recommended that Cabinet:
  - 3.1.1 Approves the Northampton Markets Development Plan attached at Appendix A.
  - 3.1.2 Grants ongoing approval for procurement of specialist and event market operators.
  - 3.1.3 Resolves to acknowledge that without prejudice to the Council's existing market rights, howsoever acquired (including by charter, letters patent, or otherwise) the Council continues to operate its Northampton markets under the Food Act 1984 as applied by the Northampton Act 1988.

### **4. Reason for Recommendations**

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- 4.1 To maximise the potential for creating successful Northampton markets, building on the opportunities created by the regenerated Market Square and the wider series of investments in central Northampton by the Council and the private sector to bring more footfall to the town centre, encourage inclusive growth and see more people utilising the space and facilities that are being developed.
- 4.2 To comply with the Council's legal obligations as a local authority and market authority.

### **5. Report Background**

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- 5.1 Northampton's markets are an intrinsic part of the identity and character of the area, serving both the town and its hinterland. The current regeneration of Market Square, from which the

markets have largely operated since 1235, creates an opportunity for the markets to, once again, form a vibrant part of central Northampton. A Market Development Plan has therefore been prepared. It sets out the ways this will be achieved, with the aim being to create and sustain Northampton markets which support a flourishing and active central Northampton<sup>1</sup>.

- 5.2 Whilst historically important, Northampton's markets entered a decline in the 1980s, as changing social, economic, and technological factors provided alternative ways of retailing and occupying time. The markets ceased to be financially valuable and became a cost to the Council, and, as public surveys have shown, increasingly did not offer goods and services attractive to many people. However, experience from Northampton and elsewhere has shown it is possible to draw people back to markets, and make them a vibrant and attractive part of a thriving centre. Using those lessons is central to the approach proposed, as is responding to public views. In surveys, people called for a range of quality products and events, including specialist markets.
- 5.3 The regenerated Market Square is central to the rejuvenation of the markets, but they will also benefit from, and support, a wide range of changes in the town centre, including the renewal of the Grosvenor Centre, the introduction of STACK in Market Walk, the regeneration of Greyfriars, and wider residential, retail and office developments.
- 5.4 It is therefore proposed to:
  - a) Procure specialist and event markets to work alongside the regular markets and expand its attraction, footfall and public visibility.
  - b) Continue actions already underway to ensure the environment is welcoming to market customers.
  - c) Invest in the existing traders, helping them to move into the 'new' market with confidence and the right approach.
  - d) Adopt a new approach to management of the regular markets, seeking to ensure that traders present are making a positive contribution to the whole, and there is a perception of quality.
  - e) Develop and implement, with partners, an events and animation strategy.
  - f) Explore developing indoor or semi-indoor markets as an additional level of attraction to Northampton.
- 5.5 Overall, these changes are expected to result in a step change in the experience of visiting the markets, drawing more people into central Northampton. They should also, over time, reduce the net costs of operation.
- 5.6 The Plan has been based on careful assessment of the factors which make for successful markets, looking at examples both nearby and across England. It has also drawn on work previously commissioned by the Council, including the Market Viability Study prepared by Quarterbridge, a leading market consultancy.

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<sup>1</sup> The markets in Daventry and Brackley, whilst important to those towns, are currently operated by the respective town councils and serve smaller areas. These are not addressed in this plan.

- 5.7 Inevitably the impact of these proposals is uncertain. Operating a market, especially in current economic, technological, and social conditions, is subject to a wide range of factors outside of the market operator's control or knowledge. However, it is considered they are as well-founded as can reasonably be achieved.
- 5.8 The Plan emphasises the desirability of helping those who traded substantially on the 'old' Northampton market to make a successful transition to the 'new' market. It makes a series of proposals in that respect, including offering a six months' rent-free period to all eligible traders.

## 6. Issues and Choices

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- 6.1 The choices for the Council are to:
- 6.1.1 Option 1: Not adopt the plan.
  - 6.1.2 Option 2: Modify the draft plan.
  - 6.1.3 Option 3: Consult on the plan, either as now drafted or as modified.
  - 6.1.4 Option 4: Adopt and implement the plan.
- 6.2 Not adopting the plan (Option 1) would leave the future direction of the markets unclear, and fail to take the opportunities created by the Council's regeneration of Market Square and wider works across central Northampton. This is therefore not recommended.
- 6.3 It is always possible to amend a plan (Option 2). Given the draft plan has been prepared drawing from both the Quarterbridge and other studies carried out by expert consultancies, and additional research into market success factors, it is suggested that at present there is little it would be worth changing at this point. However, one advantage of markets is that it is relatively easy to make changes to their operation (whilst retaining its character as a market as recognised in law), allowing adjustments to reflect prevailing conditions. For this reason, it is proposed that a degree of flexibility in setting market charges is provided (see Recommendation **Error! Reference source not found.**); other aspects of market operation are generally already able to be operated flexibly, having regard to the content of the strategy.
- 6.4 Consultation (Option 3) is often desirable on strategies and policies before they are applied. However, in this case the issue is running what is, on one level, a commercial business (albeit one with an important social role) and therefore in that respect evidence is more useful than consultation. Additionally, as mentioned above, it is possible to 'flex' the details of operation to respond to actual public views, as expressed in their desire to use the market or parts of it. It is considered this provides the best process for public engagement.
- 6.5 It is therefore recommended that the Plan is adopted and put into effect, commencing from the re-opening of the Market Square. This will allow the Council to prepare for the re-opening of the Market Square with maximum effect.

## 7. Implications (including financial implications)

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### 7.1 Resources and Financial

7.1.1 The draft Development Plan identifies likely costs and income from the markets. For these purposes the costs and income do not allow for inflation, as future inflation is unknown and merely confuses the presentation. With costs taken as £329k pa (including £40k pa for daily erection and dismantling of the demountable stalls), the net loss of £73k in 2025/26 would fall to £18k in 2029/30. The effect is shown in Table 1 (which is based on Table 9 in the Plan with the addition of information on the current MTFP assumptions).

**Table 1: Projected market net income compared to MTFP assumptions**

Type	Year				
	2025/26	2026/27	2027/28	2028/29	2029/30
Total income	-256	-275	-288	-302	-311
Costs	329	329	329	329	329
Net position	73	54	41	27	18
MTFP assumption	149	69	73	N/A	N/A
Difference	-76	-15	-32	N/A	N/A

Note: The MTFP assumption excludes £14k pa for licenses for the footfall measurement system, which are properly public realm costs and not reflected in the market costs shown in the lines above.

7.1.2 At this point no change to the Council’s budget or medium term financial plan is proposed, as the costs and – to a greater extent – income are sufficiently uncertain it would not be useful to do so. Once the markets are re-established in Market Square and the Development Plan beginning to operate, a review will be undertaken to see if any financial planning assumptions require adjustment.

7.1.3 The costs of initial support measures, which are outside of these figures, are proposed to be taken from the Council’s allocation of UK Shared Prosperity Fund (UKSPF) and other existing approved budgets and therefore would not affect the Council’s general budgets.

## 7.2 Legal

7.2.1 The Council provides and operates its Northampton markets under powers provided by the market charters, customary and prescriptive rights, the Northampton Act 1988, and the Food Act 1984 (collectively, the Council’s ‘market rights’).

7.2.2 In light of the proposed Plan it is recommended that the Council makes a declaration of market powers. The benefit of making such a declaration is threefold. It would provide the Council with (a) a reference point for appointing market days and hours, fixing charges and making byelaws as Part III of the Food Act 1984 (as applied by the Northampton Act 1988) has specific powers relating to all of these matters, (b) the declaration will also be important if as part of implementing the Plan the Council considers any existing market licensing policy and (c) if the Council was to be subject to a challenge made by any of the traders or other market operators the information regarding the powers exercised by the Council with respect to its market rights are at hand and it will provide the Council with a firm basis on which to proceed in light of any challenge. This is provided for in recommendation 3.

7.2.3 It is noted at paragraph 5.4(d) above that it is proposed that a new approach be taken in with respect to the management of the market. The Council has the powers required in its capacity as

landowner and market franchise holder to grant such rights of occupation, as may be necessary to support the delivery of the proposed Plan.

7.2.4 In considering the proposals with respect to markets in paragraph 5.4, it will be key in order to protect the Council's existing market rights that the Council keeps in balance at all times the concept of an open concourse of buyers and sellers and that any market regulations and letting policy with respect to fixed and demountable market stalls developed in connection with the Plan reflect that approach. By undertaking such an approach, it may help to mitigate the risk of any potential future challenge to exercise by Council of its market rights under the proposed Plan.

7.2.5 Although the markets are referred to as 'new', this reflects the change in character it is intended to achieve; legally, they remain the same markets, operating under the Council's historic and statutory rights, as they were in Market Square before the regeneration started, and during their time at Commercial Street.

### 7.3 Risk

7.3.1 As noted in 5.7, operating a market is inevitably risky. The success of the market only partly depends on the actions of the market operator such as the Council. Key risks in this case are as follows.

7.3.2 Risk 1: It is not practical to attract the type of additional traders sought. This would leave the market in a similar condition to that prior to the Market Square regeneration. The actions in the Plan are designed to minimise this risk.

7.3.3 Risk 2: The private sector operators it is proposed to engage to provide event and specialist markets are not sufficiently interested (despite their informal expressions of interest) or having tried such markets in Northampton find they do not work well. This would limit the benefit of the new arrangements. Mitigation may be possible in the Council organising such markets itself.

7.3.4 Risk 3: Even with co-ordination with Northampton BID (Business Improvement District) and Northampton Town Council it is not practical to deliver a sufficiently attractive events programme. This would feed into Risks 1 and 2, as footfall from events will help attract traders. This risk seems low, given the effort the Council is putting into events planning now.

7.3.5 Risk 4: Due to factors outside the Council's control, costs increase or income decreases. This would result in a higher net cost of market operation to taxpayers. Given the multiple potential issues which could cause this risk to arise, little specific mitigation can be proposed. However, the overall approach of the Plan should minimise the impact of whatever such issues did occur.

7.3.6 Risk 5: The Council is unable to secure the ongoing maintenance and care of Market Square and its surroundings to the level required to support a successful market. This could feed into Risks 1 and 2. This risk seems low, given the priority the Council is giving to the regeneration of its town centres, including Northampton.



## **7.4 Consultation and Communications**

- 7.4.1 Feedback from key stakeholders and residents from the public consultation which took place in 2019 have helped shape the strategy, ensuring that this is based on the requirements of local communities and traders.
- 7.4.2 During the preparation of the Plan, engagement has taken place with private sector market operators to understand their perspectives and potential interest in operating in Northampton. Discussions have also taken place with other local authorities which operate markets. Dialogue with existing Northampton market traders has also informed the proposals.
- 7.4.3 As noted in 6.4, a further form of public engagement will come occur once the 'new' market or parts of it open This will provide continuous feedback on how the markets are functioning and allow changes to be made accordingly.
- 7.4.4 A comprehensive communications strategy has been developed to engage with existing traders, potential traders, and local residents on the reopening of the market at the regenerated market square, as well as the future events to be held here. This will include promotion across online and offline channels, including the dedicated social media channels for Northampton's market.

## **7.5 Consideration by Overview and Scrutiny**

- 7.5.1 None.

## **7.6 Climate Impact**

- 7.6.1 The Markets Development Plan is unlikely to have a material impact on carbon emissions, either positively or negatively. However, a well-functioning and attractive market should cause some people to travel, typically more locally, to central Northampton rather than travelling elsewhere. This may have a modest beneficial effect on net carbon emissions.

## **7.7 Community Impact**

- 7.7.1 The rejuvenation of Northampton's markets will be beneficial for civic pride and identity in the town and its hinterland. Well-managed market operations should also benefit those living and working in the town centre, as it would provide an attractive backdrop to their living and working in the area.

## **8. Background Papers**

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- 8.1 None.

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# Northampton Markets Development Plan

April 2024 v0.3 (DRAFT)



## Document version control

Author (Post holder title): Markets & Urban Activities Manager

Document held by (name/section): Charlie Childs, Markets & Urban Activities Manager

## Change history

Issue	Date	Comments
0.1	26 Sep 2023	Initial draft
0.2	1 Mar 2024	Revised draft for sharing
0.3	23 Apr 2024	Final version prior to Cabinet

NB: Draft versions 0.X - final published versions 1.X

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## 1. Executive summary

Northampton's markets are an intrinsic part of the identity and character of the area, serving both the town and its hinterland. The current regeneration of Market Square, from which they have largely operated since 1235, creates an opportunity for the markets to, once again, form a vibrant part of central Northampton. This plan sets out the ways this will be achieved, with the aim being to create and sustain Northampton markets which support a flourishing and active central Northampton.

Whilst historically important, Northampton's markets entered a decline in the 1980s, as changing social, economic, and technological factors provided alternative ways of retailing and occupying time. The markets ceased to be financially valuable and became a cost to the Council, and, as public surveys have shown, increasingly did not offer goods and services attractive to many people. However, experience from Northampton and elsewhere has shown it is possible to draw people back to markets, and make them a vibrant and attractive part of a thriving centre. Using those lessons is central to the approach proposed, as is responding to public views. In surveys, people called for a range of quality products and events, including specialist markets.

The 'new' Market Square is central to the rejuvenation of the markets, but they will also benefit from, and support, a wide range of changes in the town centre, including the renewal of the Grosvenor Centre, the introduction of STACK, the regeneration of Greyfriars, and wider developments.

It is therefore proposed to:

- a) Procure specialist and event markets to work alongside the regular markets.
- b) Continue actions already underway to ensure the environment is welcoming to market customers.
- c) Invest in the existing traders, helping them to move into the 'new' market with confidence and the right approach.
- d) Adopt a new approach to management of the regular markets, so that all traders present are making a positive contribution to the whole, and there is a perception of quality.
- e) Develop and implement, with partners, an events and animation strategy.
- f) Explore developing indoor or semi-indoor markets as an additional level of attraction to Northampton.

Overall, these changes are expected to result in a step change in the experience of visiting the markets, drawing more people into central Northampton. They should also, over time, reduce the net costs of operation.

## 2. Introduction

The Council is currently engaged in the largest change to Northampton's Market Square in many decades, bringing a new atmosphere and potential. This forms part of a wider set of transformations of central Northampton, undertaken both by the Council and by the private sector. The purpose of this strategy is to re-establish Northampton's markets as a key driver of vibrancy in the town centre, taking advantage of the projects underway.

The markets have been at the centre of Northampton for many centuries. They have traded in Market Square since 1235 when Henry III forbade the selling of goods in the churchyard of All Saints and ordered that the markets be moved. The markets provided not only a place to buy, but an

experience of social interaction and vibrancy. As the town grew, the central role of the markets remained, although gradually diminished as fixed shops increasingly became major places for retailing. Nonetheless, the markets flourished. They reached a peak in the 1980s, with trade on the markets and in fixed shops mutually reinforcing the attractiveness of the town centre. After this, a decline set in, with out-of-town shopping, discount food retailers, and latterly the rise of Internet shopping, profoundly changed where people spent their money and time. From generating a surplus for the Council as owner of market rights, the market came to make a loss. Not only the markets, but their historic home in Northampton Market Square, underwent decline, with a loss of shops, perceived and actual anti-social behaviour, some poor quality development, and the physical quality of Market Square public realm declining over time.

The transformation works currently underway, in Market Square and in the surrounding areas, provides a key opportunity to bring the markets back into their central role in Northampton, playing a positive role in the future economic and social life of Northampton and the surrounding area.

### 3. Aim and objectives

The Council's aim for Northampton's markets, consistent with its Corporate Plan and Sustainability Strategy, is:

To create and sustain Northampton markets which support a flourishing and active central Northampton.

This is supported by the following objectives:

1. Operate markets with a varied high-quality range of traders.
2. Provide opportunities for local people to develop new businesses and create employment.
3. Engage local students including with opportunities relating to their courses.
4. Support an active and attractive Market Square.
5. Over time, to achieve at least a break-even for delivering the markets.

### 4. Current condition of the markets

#### 4.1 Context

The markets are currently located in the Commercial Street car park, Northampton, whilst the regeneration works in Market Square take place (see below). It is therefore necessary to consider the condition of the markets prior to their relocation to Commercial Street as well as reflect on the experience of operating at Commercial Street.

#### 4.2 Overall position

At its peak in the 1980s the market had 225 stalls and generated significant revenues for the Council. The number of days the market operated was increased, reflecting demand. Since that time the number of stalls has declined, with the overall quality of the market also declining. Before the Market Square regeneration project got underway, there were 24 permanent stall holders and 11 that operated on pay as you go basis. The market ran from Monday – Saturday, but with Monday providing fresh fruit, vegetables and cut flowers and plants only. A sizeable portion of the current semi-permanent market stalls were not occupied.

In 2021/22 the markets were subsidised by the Council: expenditure of £289k against income of £177k left a deficit of £112k. Further details can be found in Table 1. The figures for 2022/23 are



partly, and those for 2023/24 wholly, affected by the temporary relocation to Commercial Street and the removal of trading fees during that time and therefore should not be regarded as comparable with previous years. Conversely, 2020/21 was particularly affected by the Covid-19 pandemic and therefore cannot be considered a guide to market net costs in normal times (2019/20 and 2021/22 were also affected, but to a lesser extent).

**Table 1: Market income and expenditure over time**

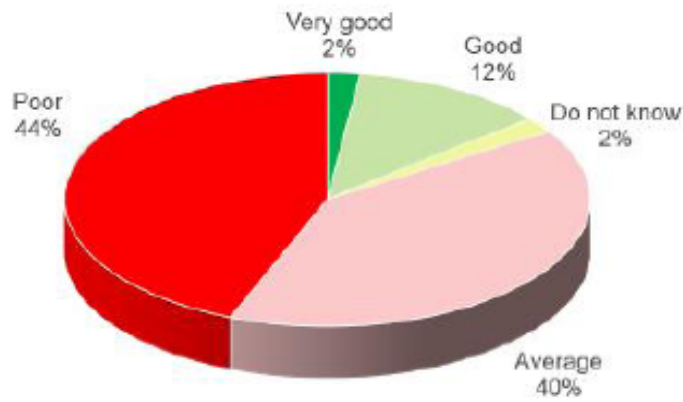
	£k						
	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Employment costs					178	186	195
Professional fees and services					18	18	18
Business rates					45	35	0
Refuse					14	20	18
Vehicle expenses					10	18	18
Advertising					4	4	4
Licences (footfall monitoring)					10	10	10
Sundry items					9	10	10
<b>Actual/projected expenditure</b>	<b>358</b>	<b>331</b>	<b>331</b>	<b>272</b>	<b>289</b>	<b>301</b>	<b>273</b>
<b>Actual/projected income</b>	<b>(268)</b>	<b>(254)</b>	<b>(219)</b>	<b>(248)</b>	<b>(177)</b>	<b>(127)</b>	<b>0</b>
<b>Deficit/(surplus)</b>	<b>90</b>	<b>77</b>	<b>112</b>	<b>23</b>	<b>112</b>	<b>174</b>	<b>273</b>

### 4.3 Public perceptions

The Council consulted on a masterplan for Northampton town centre in September 2019. The forward-looking elements of that consultation are considered below (see 5.3), but the public's recorded view of the quality of the market should be noted here. This is shown in Figure 1.

**Figure 1: View on products and services available on the markets (September 2019)**

*What do you think of the current products and services available on the market?*



Base: all answering question (n=548)

It can be seen that the markets were failing, to a very large degree, to attract people.

#### 4.4 Market Square footfall

As shown in Figure 2, there was a 14% reduction in footfall from 2014 to 2019 (Figure 3 shows the location of the footfall counter with the market layout prior to the Market Square reconstruction works commencing).

**Figure 2: West Northamptonshire Council Market Square monthly footfall figures 2014 – 2022**

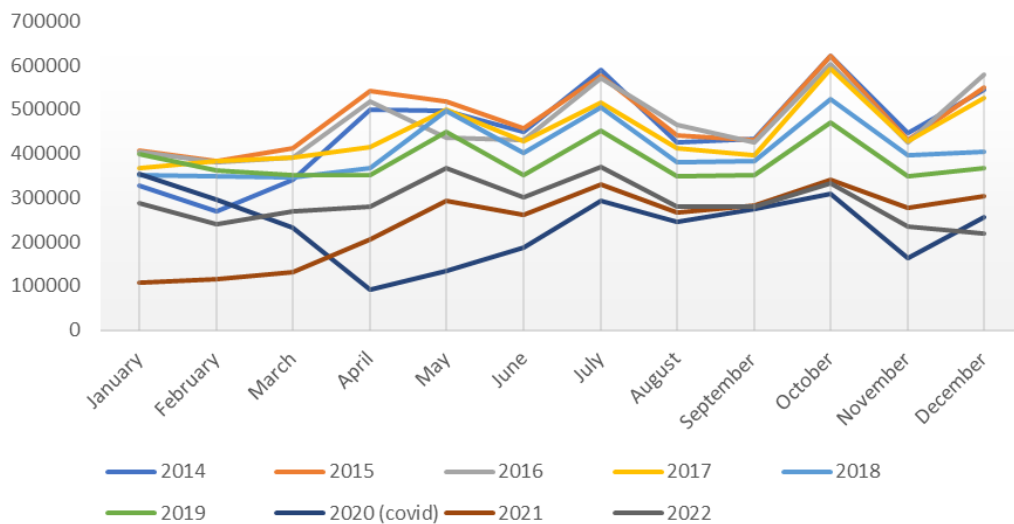
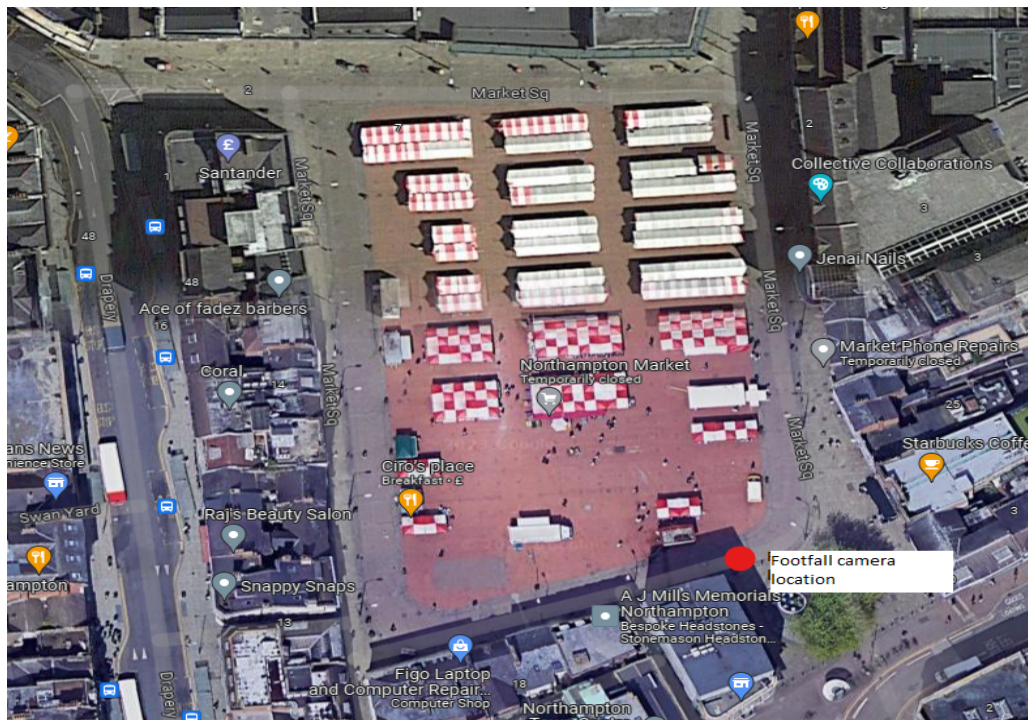


Figure 3: Footfall camera location and previous market layout



It is reasonable to assume that the perceived quality of the offer, both in the markets and the fixed shops (with an increase in vacant ground-floor buildings) has been a significant factor in the decline in use. The public engagement (see section 5.5) was clear that in addition to the limited offer provided by the market, it was important to create an environment which felt secure and clean.

#### 4.5 Commercial Street experience

During its temporary relocation to Commercial Street, the market has struggled to attract shoppers except during some special events.

To assist the traders and working in collaboration with them, the Council commissioned an events programme for the summer of 2023. This included a beach similar to that used previously on the Market Square as well as crazy golf and circus skills workshops. Unfortunately, the particularly inclement weather throughout the summer, particularly at weekends, made it difficult to draw meaningful conclusions from these activities other than to say that they were well attended when the sun shone. The market traders reported there was very little effect if any on their income during this period.

Two specialist markets were run in April and in July/August:

- A "Bite Street" street food event with a similar antiques and collectible offer. This was a success for all attending, proving that customers will spend if the offer is of sufficient quality. As the regular traders were not present the impact on their takings cannot be known.
- The traders also ran two 'antiques & collectibles' markets during the same period. These were well attended, although the regular market traders did not report an uplift in sales.

#### 4.6 Conclusions

The conclusion to be drawn from the information available is that the regular market stalls are not capable of sustaining a viable and attractive market by themselves. Conversely, specialist markets,

offering higher quality, or at least different goods and experiences, do appear to be capable of being successful, even in the 'off pitch' area of Commercial Street.

It will also be essential to overcome the strong public perception of the area where the market is held as dirty and (at least at times) unsafe. However, achieving a perception of safe and clean should be regarded only as a starting point, on which an attractive offer can build successful markets.

The broader factors which can deliver a successful market are addressed below.

## 5. What makes successful markets?

### 5.1 Lessons from elsewhere

#### 5.1.1 Introduction

Whilst Northampton has its own unique characteristics, many of the factors which make for a successful or unsuccessful market are common within England and indeed more widely. The summaries given in Appendix B set out how other markets with a degree of comparability are performing and what factors appear to have driven those changes, for good or ill. The focus is on markets in the surrounding area, but some examples from further afield are also given where these appear to teach useful lessons. These lessons from each market are summarised in Table 3.

**Table 3: Market success factors from elsewhere**

Location	Type	Changes over time	Factors appearing to be linked to success or failure
Leicester	Outdoor & food hall	Significant investment since 2014 including new food hall, events space, and outdoor covered market.	<ul style="list-style-type: none"> <li>Website and social media channels are instrumental in the markets continuing success.</li> <li>Constant investment has also been important.</li> </ul>
Stratford-upon-Avon	Outdoor	Historic charter market operated by third party for last seven years.	<ul style="list-style-type: none"> <li>Outsourcing the operation has been positive for this location, the operator offers a turnkey solution providing traders and the required infrastructure.</li> </ul>
Warwick	Outdoor	Operated by third party for some time.  Trying to add an additional Wednesday market was not successful as it was not supported by the surrounding businesses nor potential patrons.	<ul style="list-style-type: none"> <li>Outsourcing the operation has been a success for Warwick, the operator offers a turnkey solution providing traders and the required infrastructure.</li> <li>Extending operating days may fail if there is insufficient demand.</li> </ul>
Coventry	Indoor	Little has changed with the market since built in 1958.	<ul style="list-style-type: none"> <li>Small events and a social media presence helps generate footfall.</li> </ul>

Location	Type	Changes over time	Factors appearing to be linked to success or failure
Kettering	Outdoor	Outsourced to private operator then back to Council again. Moved location.	<ul style="list-style-type: none"> <li>• Change of location to busy shopping street had positive effect.</li> <li>• Town Council's introduction of events and social media channels has uncertain impact so far.</li> <li>• Use of third party event market operator did not seem to work.</li> </ul>
Milton Keynes	Fixed outdoor	Privately operated for over 30 years, recently taken over by Milton Keynes Development Partnership (which is owned by Milton Keynes City Council).	<ul style="list-style-type: none"> <li>• Providing fixed, lockable units has been key to its success.</li> <li>• A number of small 'events' and high-quality food offer trials were not successful as a result of a combination of perception of low-quality offer, location, and effective competition from fixed food businesses.</li> </ul>
Loughborough	Street	Thursday and Saturday only. Research showed that what was being sold on the market was not what the students wanted. New manager appointed in the past 18 months.	<ul style="list-style-type: none"> <li>• Use of research into customer demand was useful.</li> <li>• Strong ties with students making use of the market to sell their goods. Vintage markets attract the biggest crowds with a student led demographic. This has led to increased popularity of the regular market amongst students.</li> <li>• Use of digital marketing &amp; web design intern/ apprentice to improve online footprint.</li> </ul>
Nottingham	Indoor, outdoor	Very little has changed in the regular general markets, all of which have struggled to recover post Covid.	<ul style="list-style-type: none"> <li>• Insistence upon market trader business plans has shown some results with sustainability.</li> </ul>
Norwich	Fixed outdoor	Complete refurbishment in 2006 installing new units but with same look and feel	<ul style="list-style-type: none"> <li>• Focus on street food has increased occupancy rates and footfall.</li> </ul>
Altrincham	Indoor	Refurbished as part of the town revival plan in 2014	<ul style="list-style-type: none"> <li>• Street food and evening entertainment with themed</li> </ul>

Location	Type	Changes over time	Factors appearing to be linked to success or failure
			markets keeps the space animated creating high footfall.

### 5.1.2 Success factors

Drawing from Table 3, the main factors which appear to have driven the success of markets are:

- Varied events and specialist markets supplementing the existing market offer drive a more diverse customer base.
- Street food traders are attracting new customers to markets.
- Consistently active websites and social media channels when used effectively provide positive engagement.
- Student presence, and market offer relating to that, can be useful.
- Contracting market operations to a third-party has proved successful in some instances. Private operators provide everything required for a successful market. They are also able to adapt to current trends quickly, using the multiple traders on their books.
- Asking for and reviewing business plans may help securing a better quality of trader.

## 5.2 Market operating models and their impact on success

There are various operating models that can be applied to markets. The current model employed in Northampton is local authority managed and has been so historically.

Studies were conducted into these operating models in 2010 by the then Department for Communities and Local Government (DCLG)<sup>1</sup>. Whilst fairly old, the information is still relevant. The details are given below, with the case studies being taken directly from that document. The types of market operation are outlined in Table 3, and described in more detail Appendix C.

**Table 4: Main types of market operating model**

Type	Percentage of markets operated*
Local authority managed	84.7%
Fully privately managed	9.6%
Partnership model	5.7% (collectively)
Arms-length LLP	

Note: \* According to the 2022/23 NAMBA markets survey

Based on the examples given in Appendix C, the nature of management appears to be less significant than the skills and experience of the management team, its freedom to act, and the ability to secure necessary investment. To the extent an operating model supports this, it may be beneficial.

### 5.3 Market Square masterplan consultation results

The Council consulted on a masterplan for Northampton town centre in September 2019. This identified two key themes:

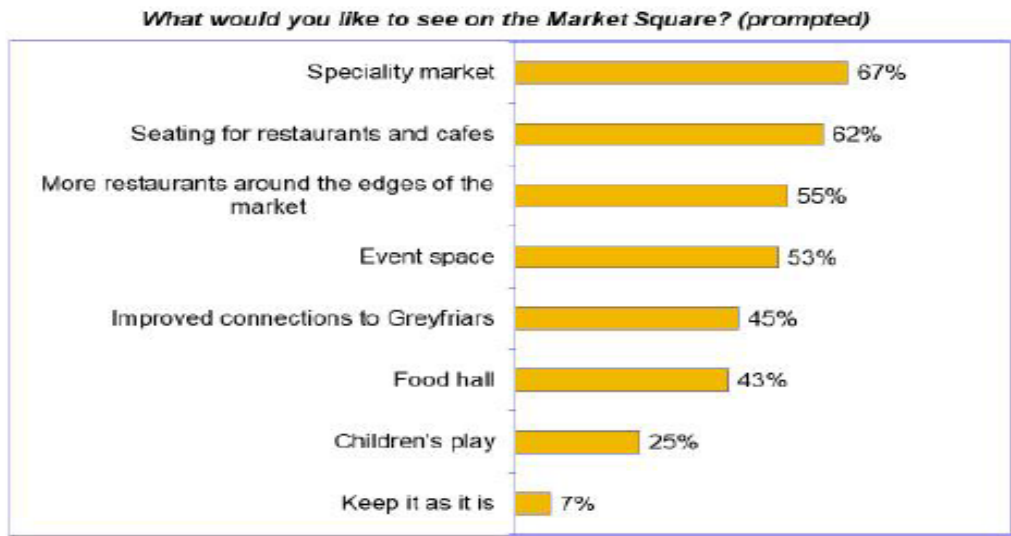
<sup>1</sup> Retail Markets Management models, CLG, 2010.



- Improving the retail experience is essential.
- The need for greater provision of the food and drink offer. More than four out of five stakeholders thought that food and leisure use should be encouraged within the town centre.

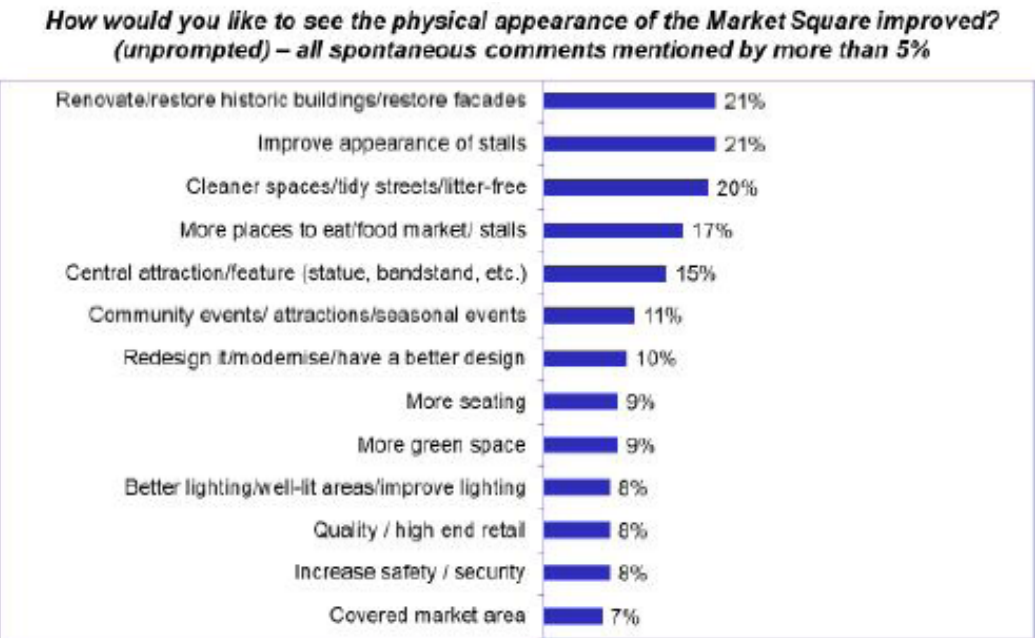
The consultation identified prompted (Figure 4) and unprompted (Figure 5) views on desirable improvements to the Market Square, and thus at least tangentially to the markets.

**Figure 4: Prompted views on desirable changes to Market Square**



Base: all answering question (n=547)

**Figure 5: Unprompted views on desirable physical changes to Market Square**



Base: all answering question (n=488)

In the prompted responses, it can be seen that support for speciality markets was the highest, at over two-thirds of prompted respondents, and that space for outdoor eating was apparently also strongly supported (explicitly in the second item and implicitly in the third). Whilst a food hall, also

strongly supported at 43%, cannot reasonably be provided in the Market Square, it is a possible market intervention for other locations.

Whilst all such 'customer' survey results should be treated with a degree of caution, as people's statements are not always reflected in their behaviour, at least a general indication of the types of things likely to lead to successful markets may be gained from these results.

#### 5.4 Northampton Market Square Viability Study (Quarterbridge)

The Council commissioned Quarterbridge to make proposals for the development of the markets. Quarterbridge is a specialist markets consultancy and also part of a group which operates markets on a commercial basis. This link to commercial operations is a potential source of bias but also provides very useful access to practical knowledge of making successful markets. The final report was published in December 2021.

Quarterbridge's advice, taking into account the physical changes planned for Market Square (see section 6) was, in summary:

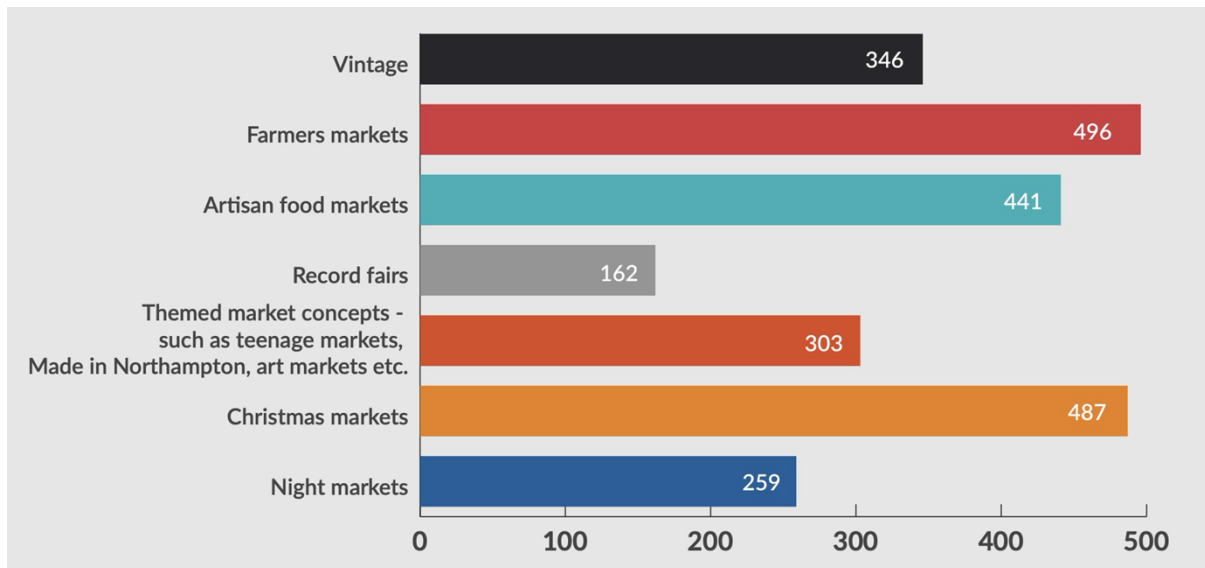
- Adopt lockable, physically secure fixed units. These should account for traders' varying needs and must not be designed to a one-size-fits-all model.
- Provide pop up stalls to enable flexibility for the increasing population of transient market traders.
- Provide good quality seating around the square.
- Create a flexible, serviced space.
- Create a regular programme of events and activities to draw footfall and use the market square as the focus for community and civic life in Northampton, keeping the space animated.
- A strong brand and social media presence with a robust marketing and promotions strategy posting daily content is necessary to realise the market's full potential.
- Further resource is required for marketing and events.
- Every effort must be made to discourage anti-social behaviour.

#### 5.5 Northampton Market Square community engagement report

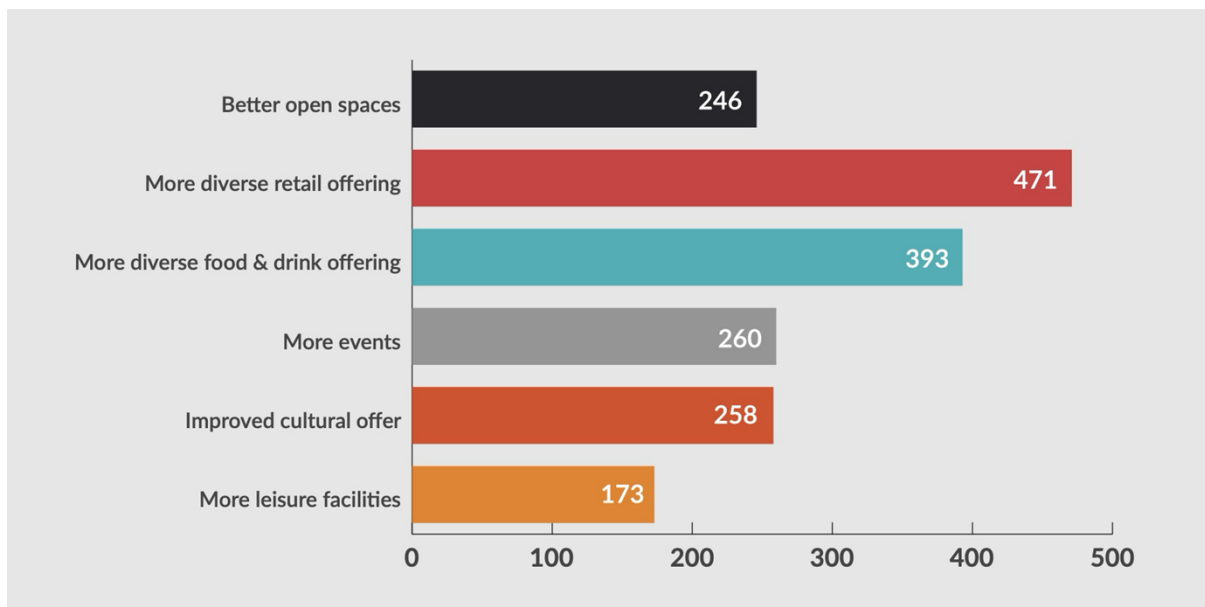
The Council commissioned the Social Integrated Agency to carry out a community engagement consultation from February to April 2022. Figures 6 and 7 are the most relevant results when considering what is likely to be successful for the markets.



**Figure 6: Responses to ‘What type of businesses would you like to see on the Market Square?’**



**Figure 7: Responses to ‘What would make you want to spend a day in the town centre?’**



There was overwhelming support for the market operating ‘pop up’ stalls for people to try new businesses.

There was support for events, although most of those identified (outdoor theatre, outdoor cinema, big screens for major sporting events, and leisure and sporting activities) may not support markets to a great extent as they can absorb people’s whole attention, meaning that whilst they may be in the town centre they do little shopping. The ideal form of event for a market is one which allows interspersed shopping and engagement. The most popular suggestion, live music, can work in this way; this is reflected in STACK’s business model (see 6.3).

The following quotations from the report illustrate the types of market content people said would attract them.

*“It just needs to be more “happening” – quirky stalls and decent events will help with that.”*

*“I love the fresh fruit and veg stalls but I would be encouraged to stay longer if there were stalls selling different foods, street foods and maybe live music or entertainers etc. It would be great if it had the atmosphere of somewhere like Covent Garden.”*

*“More business surrounding the market that do food, coffee etc. with tables and chairs outside making a family friendly culture more like you see abroad.”*

These conclusions are similar to those of the previous studies, and thus reinforce the messages that they identified.

## 6. Changing context

### 6.1 Physical transformation of Market Square and Abington Street

The Council has committed to a physical transformation of Market Square; construction work is currently underway. The £12m investment to create an attractive and welcoming environment for visitors is seen as the catalyst regeneration project for the Town Centre attracting increased footfall and leveraging substantial private investment in Northampton.

The aspiration for the Market Square was set out<sup>2</sup> as follows:

*An aspiration for this project is to deliver meaningful change within the heart of the town centre. Following the redevelopment the market must feel like a completely new experience for customers, appealing to a wider demographic. This can be achieved through a combination of infrastructure change, public realm design and operational interventions.*

*The Market Square must be seen as, and operated as, more than just a trading space. It should be an active and animated space in which music, street food, speciality markets and regular events can be found, integrating seamlessly with the regular market operations to provide a high-quality customer experience.*

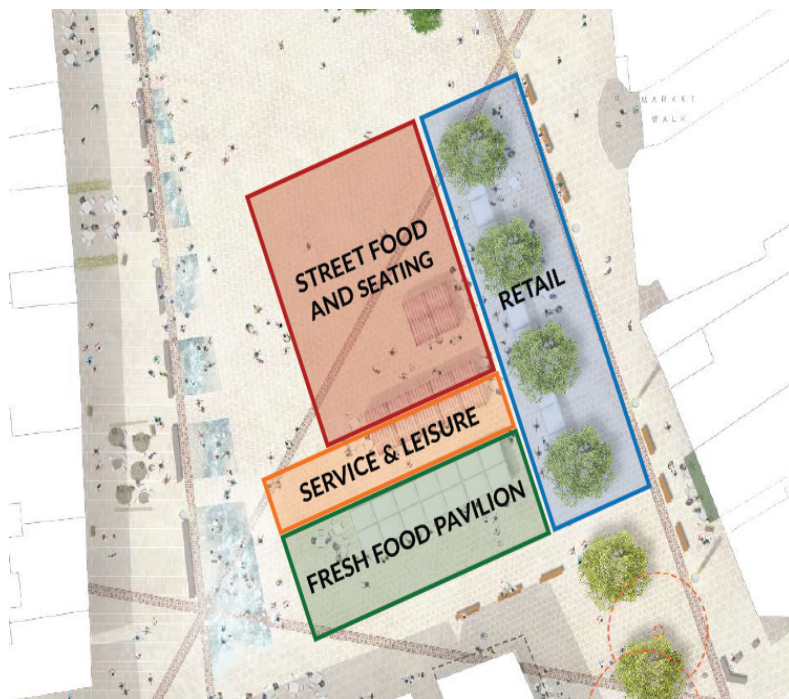
*Following the redevelopment, the market should feel like an exciting new space, creating meaningful change.*

Figure 8 shows an indicative layout based on user mix proposed in the report and Figure 9 as Market Square is currently being constructed. The entrance to STACK (see 6.3) is highlighted.

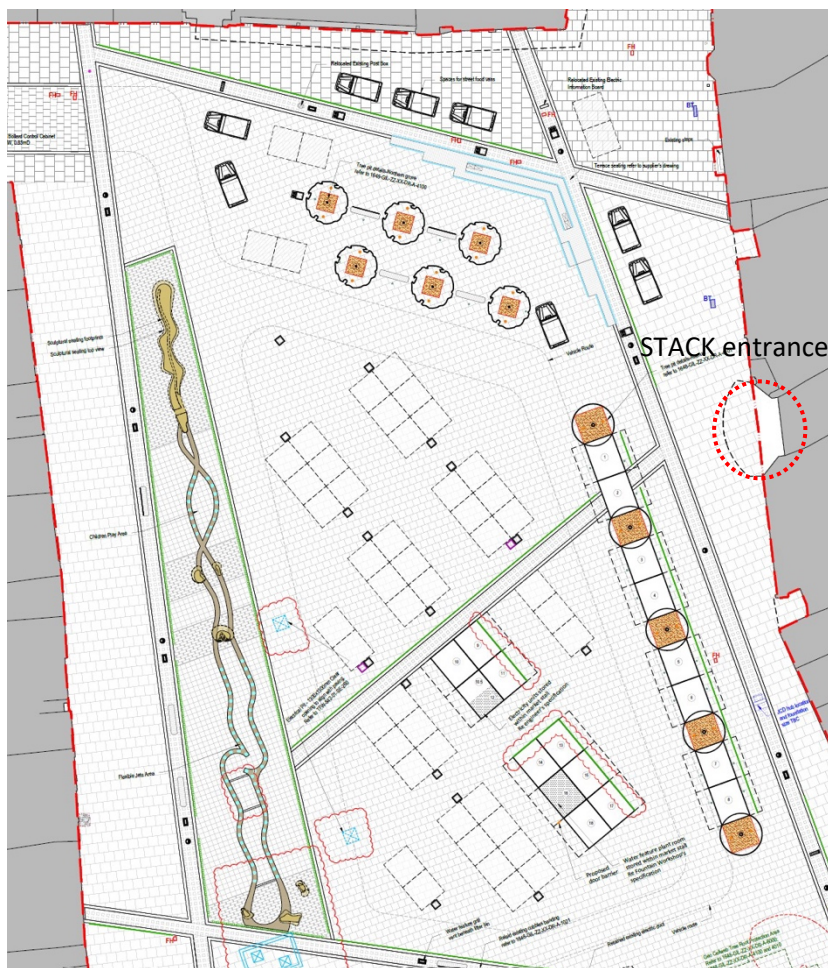
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<sup>2</sup> Northampton Market Square viability study, October 2021. Appendix 1.

**Figure 8: Indicative layout from Northampton Market Square viability study (October 2021)**



**Figure 9: General arrangement for the scheme final design**



The 'new' Market Square will provide:

- 16 fixed market stalls with a total trading area of 192m<sup>2</sup> (12m<sup>2</sup>, c.130ft<sup>2</sup>, per stall). These would be capable of being locked, allowing goods to remain when trading is not occurring.
- 19 locations for demountable market stalls with a total trading area of 171m<sup>2</sup> (9m<sup>2</sup>, c.97ft<sup>2</sup>, per stall). These would be much lighter structures, suitable for being removed each evening if required.
- A further 26 locations for demountable market stalls in the events space with a potential total trading area of 234m<sup>2</sup>. This allows for flexible extension of the market. Additionally, if useful it is still possible to locate demountable stalls in other locations, using weights to secure them.
- Up to 10 locations for food concession vehicles.
- A large, tiered seating area and ample seating to accommodate the general public.

The works on Market Square will be complemented by works to renew the physical layout of Abington Street. Particularly at the western end of Abington Street, this should provide a more attractive context for activities taking place in the Market Square, including the markets.



## 6.2 Renewal of the Grosvenor Centre

The Grosvenor Centre is a large shopping centre built in the 1970s. Historically it had a helpful synergy with the markets in Market Square, as large numbers of people passed into and out of the Grosvenor Centre through Market Square. However, like many such centres, the Centre entered into a period of decline with shops closing and footfall decreasing. However, it has now been acquired by Evolve Estates, an active asset manager which has stated it intends to remain the owner for the long term and is therefore seeking to enhance the uses of the Centre in both retail and leisure sectors.

It is therefore likely that pedestrian flows through Market Square will increase over time. The Centre may also, in the longer term, open later into the evening.

## 6.3 Introduction of STACK into Market Walk

The Council has supported the introduction of STACK into the disused Market Walk shopping arcade. STACK is a leisure operator providing a range of up to ten street food 'stalls', bar, and leisure within a covered environment, but ideally spilling out into the adjacent area. Based on STACK's performance in other cities and towns, it is expected to achieve a footfall between one and three million per year. As even in a good year existing footfall was something like five million per year (see Figure 2), this suggests the impact of STACK may be to significantly increase footfall locally.

STACK Northampton is expected to be open all days of the week, from 10 am to late with daily live music and entertainment.

## 6.4 Greyfriars regeneration

Whilst a longer-term project, it is relevant to the context of the markets that the Council is working up a masterplan for the regeneration of the wider Greyfriars area (see Figure 10). Over time this is likely to result in a large number of new dwellings being built on the site. This should provide an increased market for the goods and services sold on Northampton markets. Whilst this is unlikely to generate any significant benefit before, say, 2029 it should be borne in mind for longer-term market developments.

**Figure 10: Greyfriars Masterplan area**



The emerging thinking on the masterplan is that there will only be a small amount of retail and business space, given Greyfriars' location immediately adjacent to the town centre. However, it is expected that the master plan will propose that Emporium Way becomes a focus for small-scale retail and leisure activities. This is intended to make it an active and safe space; it would also help deliver the public desire for 'Improved connections to Greyfriars' (see Figure 4).

## 6.5 Four Waterside and Mare Fair development

A further major development scheme is expected to bring a range of houses, a hotel, and grade A office space to the area between Greyfriars and Northampton Station. The Council has procured a development partner to deliver this scheme. Whilst somewhat more distant from the core town centre than the Greyfriars scheme, this development also offers the potential for a new customer base for the market, including residents, hotel residents, and occupiers of the office space.

## 6.6 Student presence

The main campus of Northampton University, home to over 16,000 students, relocated to a site known as Waterside, around 1.1km on foot from Market Square, in 2018. This should have benefited the town centre, including the market. A new (private sector) student accommodation block is currently being constructed on the Drapery, close to Market Square, and more student accommodation appears likely to be constructed in the town centre.

In 2023/24 the average student will spend circa £133 per month on groceries, £66pm on takeaways and eating out and £48pm on clothes and shopping<sup>3</sup>. If just 10% of this across the 16,000 students was spent in the market it would equate to £4.7million of turnover or nearly £50,000 pa per stall if there were 100 stalls. Whilst of course such numbers are only indicative, they give an idea of the scale of potential from better serving the student market.

## 6.7 Car parking changes

The Council is reviewing its strategy for managing car parking serving central Northampton as demands change and, in particular, the Mayorhold multi-storey car park (MSCP) is reaching the end of its life. It seems likely that within a few years the Mayorhold MSCP will have been removed. The other three MSCPs (Grosvenor Centre, St John's, and St Michael's) are all likely to remain for many decades. A new MSCP is proposed at Northampton Train Station, but this is dependent on the scheme becoming financially viable, and it may therefore not be built. More generally, the Council will be developing a parking strategy for central Northampton. This will seek to ensure there is sufficient parking whilst supporting an attractive place to enjoy on foot. This should support the markets.

# 7. Analysis

## 7.1 Introduction

As the Market Square viability study noted, the Market Square transformation project will deliver an enhanced environment, but it is vital that the space is animated appropriately with a quality, diverse and financially sustainable market. Without this, the regeneration works will not achieve their full potential.

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<sup>3</sup> [www.finder.com/uk/student-spending-statistics](http://www.finder.com/uk/student-spending-statistics)

The section of the Plan assesses the factors likely to lead to success or failure for the markets, and how the Council can plan for success.

## 7.2 SWOT analysis

Northampton's markets have a range of strengths and weaknesses and face a range of opportunities and threats. Some of these are outlined above, in section 6. To help understand the factors and consider what they mean for delivering successful markets, a SWOT analysis has been conducted.

Strengths	Weaknesses
<p>S1. Historic identity.</p> <p>S2. Large open space with room to grow the market.</p> <p>S3. Proximity to bus interchange and car parking.</p> <p>S4. Proximity to main shopping areas.</p> <p>S5. Established community and civic events calendar</p>	<p>W1. Weak existing offer.</p> <p>W2. Vulnerability to the weather.</p> <p>W3. Poor quality public realm.</p> <p>W4. Limited complementary retail in fixed shops.</p> <p>W5. Actual or perceived anti-social behaviour.</p> <p>W6. Lack of brand identity and online/social media presence</p>
Opportunities	Threats
<p>O1. New physical Market Square layout.</p> <p>O2. Grosvenor Centre renewal.</p> <p>O3. Introduction of STACK.</p> <p>O4. Emporium Way re-invention (as part of Greyfriars regeneration).</p> <p>O5. New access provision as part of parking strategy.</p> <p>O6. Access to spaces for indoor markets.</p> <p>O7. Multiple developments, including conventional and student accommodation, offices, and hotel, in the proximity.</p> <p>O8. Interest from speciality market operators.</p>	<p>T1. Introduction of STACK.</p> <p>T2. Loss of Mayorhold MSCP.</p> <p>T3. Further development of Internet shopping and leisure.</p> <p>T4. Lack of interest in running market stalls.</p> <p>T5. Grosvenor Centre potential competitive development of 'micro shops'.</p>

## 7.3 Constraints

The Council has wide choices about how it operates the Northampton markets. However, there are practical and legal constraints which do constrain those choices.

The Council is permitted to operate markets under the Food Act 1984 as applied by the Northampton Act 1988. This means that the special powers previously held by the Corporation of Northampton and latterly Northampton Borough Council ceased to apply in 1988. However, the definition of 'market' in the Food Act is extended by the Northampton Act to include fairs, and the power to open a market to include a power to close or move it.

The practical effect of this is that the Council's ability to hold a market on the highway (which most of central Northampton not built on, a churchyard, or open space is) is limited to:

- a) Those places where highway rights are subject to market rights. This is a matter of fact, with highway rights overriding market rights if 20 years pass when no market is held. In consequence, it appears that only in Market Square can markets be held on this basis.

- b) Where legislation allows markets or street trading more generally to take place. This is a complex area of law.

Additionally, there is case law defining, although without complete precision, what a 'market' is. This is essentially a concourse of buyers and sellers. Essentially this relates to the ability of people to turn up and trade, although this does not require unfettered access. However, it does limit how long the Council can commit any particular stall or pitch to one trader. 13 weeks is often taken as the limit for a legal commitment to any specific trader in a (legal) market.

Where the Council is not relying on market rights or powers to hold a market as defined in law (for example, stalls not on highway) these limitations do not apply. In those cases, the Council can use its normal powers to 'dispose' of land (let it out) and there are no particular limits on lengths of agreements.

#### 7.4 What does this mean for Northampton markets?

It is clear that Northampton town centre is at the start of a significant programme of change with the Market Square being the first in a string of regeneration schemes. New housing, student accommodation, hotel places, and offices will present a new opportunity for the Northampton markets if they are positioned correctly. The refreshed appearance of the centre offers an opportunity to recapture its place, with the market as part of that, as a centre for Northampton as whole, and the villages beyond.

The evidence from trading data, the master plan, and consultations is that change is required, some of which has already been addressed in the schemes currently under construction. This Plan must ensure that we curate a cleaner, safer space with a diverse offer that attracts demographics from across Northamptonshire and beyond. A high quality offer with strong brand identity is important and will be fundamental to success, as will an active online presence. We must also take advantage of the opportunities presented by STACK and the renewal of the Grosvenor Centre; this will involve both co-operation and healthy competition with them.

Opportunities to expand the offer of the markets must also be explored, whether in space surrounding Market Square or separate premises.

## 8. Proposals

### 8.1 Introduction

To ensure the market provides a vibrant and diverse offer which is attractive to the residents of West Northamptonshire and its visitors, it is vital to get the basics right first time at the same time as curating the experience. This is addressed by exploring the normal outdoor markets as well as 'event' markets, and the potential for indoor and/or semi-indoor market spaces in the centre of Northampton.

### 8.2 Strategic choice – 'make or buy'

The Council has a strategic choice about whether to continue to operate the markets itself ('make'), or to bring in an operator ('buy'). Examples elsewhere (see above) indicate that a commercial operator can bring significant benefits. However, it is not a 'magic bullet' and some councils have concluded they are better able to make their markets successful by bringing operation back in house.



It was notable that in soft market engagement operators expressed at least a theoretical willingness to operate events markets in central Northampton, and even pay the Council a fee for this.

For the present, it is proposed that:

- a) Regular markets will continue to be run by the Council, with the changes in approach outlined below.
- b) Operators of specialist and event markets (see 8.6) will be procured.
- c) After two to three years, the operation of both will be reviewed and consideration given to whether the results suggest further changes would be beneficial.

This approach should allow the Council to manage risks and costs, whilst maximising the opportunity to enhance the markets' offer to Northampton and the surrounding area.

### 8.3 Ensuring a good starting point

In addition to positive steps, which are covered in the section below, the Council needs to eliminate, at far as possible, negative factors which discourage people from visiting and spending time in and around Market Square. These factors are actual or perceived anti-social behaviour, and perceived 'dirtiness', which is largely associated with the presence of commercial waste bins and matter surrounding them.

The Council is therefore:

- a) Ensuring the Market Square and surrounding area is a focus for attention to proactively address anti-social behaviour, including through use of its neighbourhood wardens and by working with the Police.
- b) Developing and implementing a strategy to remove visible commercial waste storage on and around Market Square.
- c) Ensuring there is a high level of cleansing of Market Square and its surroundings.
- d) Ensuring there is rapid and effective repair of damage to the surface or fittings of Market Square.

### 8.4 Existing traders

The Council values the contribution of those who traded for a significant period on Market Square prior to the start of rebuilding, and of those who traded substantially at Commercial Street during that period. It wants to help them secure their future in the 'new' Northampton markets. To this end it will:

- a) Provide each eligible trader<sup>4</sup> with a package of support including formal business training, and a mentor.
- b) Allow each eligible trader a period of six months prior to charging rent on demountable stalls and food concession pitches needed for their business.

### 8.5 Regular outdoor markets

As identified above, there are substantial opportunities to grow the regular outdoor markets. To take advantage of these, the Council will:

- a) Plan the layout and uses of stalls to address the expected patterns of movement, especially once STACK opens.

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<sup>4</sup> A detailed definition of eligible traders will be developed, covering those who traded for significant periods.

- b) As appropriate, operate different days or zones, potentially branded as different markets, so that the attraction of the core market is not diluted with stalls which undermine its character. These could be, for example, the 'new business' market.
- c) Require traders to meet defined quality standards, including the appropriate use of sustainable products and packaging.
- d) Give priority when allocating stalls to those market traders who submit a business plan showing they are likely to have a successful business and whose presence would contribute to the success of the market. In particular, traders who do not meet these requirements would not be allocated a fixed stall.
- e) As a partial exception to (d) above, provide access to time-limited low-cost stalls for start-up businesses, including opportunities for university and college students. Whilst these stalls would not be required to demonstrate credible business plans, they would need to show they had a product or service which (i) was likely to be attractive to buyers, and (ii) would be likely to contribute to the success of the market overall. It is likely these stalls would be in a distinct zone, advertised for its experimental offer.
- f) Develop relationships with the University of Northampton Arts & Design and other relevant units, and similarly with Northampton and Moulton Colleges, to provide a channel for students and staff to trade on the market.
- g) Providing all traders who appear likely to benefit from it with business support provided by WNC's Economic Growth & Inward Investment team and partners.
- h) Develop and sustain a strong social media presence for the markets.
- i) Develop a communications strategy for traders, including work to attract suitable traders, with a particular focus on those identified as desired in the consultations, such as quality fresh food/produce and street food offers, baker, delicatessen, and fishmonger.
- j) If the actions described in this Plan are particularly successful, develop additional market zones in suitable places in central Northampton, allowing for a greater variety of trading and supporting the vibrancy of Northampton town centre.

As further specific action in support of the markets re-opening on Market Square the Council will:

- k) Provide fit-out of fixed stalls designed to meet the needs of the traders' businesses. A capital budget of £50,000 is set aside for this.
- l) Use the Business and IP Centre (BIPC) business support programme or similar arrangements (funded by the UK Shared Prosperity Fund (UKSPF)) to provide business support for traders on the Northampton markets.

The Council would, of course, continue to require that all traders met legal and regulatory standards including those for hygiene and display.

To capture the above formally, the Council intends to produce a Balance of Trade Policy.

## 8.6 Specialist and event markets

Specialist markets were a key resident desire, as disclosed in the various consultations discussed above. They are also, as seen elsewhere, a potentially powerful tool to bring people into central Northampton, making the place more vibrant and enjoyable, and supporting the viability of town centre businesses.

The Council will therefore procure a range of specialist and event markets, such as vintage clothing, vinyl records, farmers', Christmas, and continental markets, with an aim of 15 in 2025 increasing to 26 by 2028. These should, overall, not incur cost and may generate some income for the Council

(some markets may come at a cost, and others make an income, with the aim being to at least break even overall).

These markets should make a marked impact on the vibrancy and attractiveness of central Northampton.

Practically, to ensure continuity of the core market offer, these event or specialist markets would run alongside the traders using the fixed stalls and, in most cases, also those in the core area for demountable stalls.

## 8.7 Events

Aside from event or specialist markets, other events are valuable in their own right and also, if designed correctly, support successful market trading. Animating Market Square successfully will improve the public perception of Northampton as a destination which in turn will increase footfall. The events space being created will act as the civic and community hub for Northampton and will be valued by residents, visitors and businesses. The market square already hosts a rich and diverse mix of events; this can be built on.

The Quarterbridge report stated:

*“Event markets must sit within a wider town centre events and animations strategy. Establishing a programme of events will be a challenge, nevertheless, developing a programme of event markets, which will start small and be nurtured, alongside heavy promotion and discount stall fees will be crucial to reviving Northampton’s reputation as a market town.*

*However, events don’t have to be large-scale to be effective. A ‘little and often’ animation strategy which makes every trip to the town centre feel like an experience can be hugely beneficial, changing perception of the town at lower cost than a major events programme.*

*This can be through encouraging or commissioning buskers and musicians, bringing in street food and café culture, offering family-friendly performers and face painters and co-ordinating ‘treasure trails’ in shop fronts across the town centre.”*

The Council will therefore:

- a) Develop and implement a town centre events and animation strategy.
- b) Intensify its engagement with Northampton BID, Northampton Town Council, and other key stakeholders to secure the delivery of a varied and interesting events programme in and around the Market Square.

These events may include opportunities such as for major sporting events such the Rugby World Cup in 2027, cultural activities, and celebrations of local heritage and identity.

## 8.8 Indoor markets?

It is notable from consultations there is strong support for an improved food offer or to have a food hall. There is also a wider interest in ‘vintage’ and other non-standard products, and general strong support for a more diverse retail offer. It is unlikely all of this demand can be met in Market Square or even in other outdoor locations in the centre of Northampton.

The Greyfriars masterplan is also likely to recommend that Emporium Way becomes a focus for small-scale retail and leisure activities. This will help it be a secure and welcoming environment. Since Emporium Way is under cover, although open on one side, it represents partially indoor environment. It is also immediately adjacent to the Market Square. As Emporium Way is not highway, the restrictions on lettings of stalls mentioned in 7.3 do not apply.

Looking further ahead, there is potential to develop a fully indoor market (again, not one subject to the constraints of a legal market) in disused or poorly used space in the town centre. This would provide further opportunities for vintage sales, for a food court, and for art and craft activities.

The Council will therefore:

- a) Develop proposals for semi-indoor market operation in Emporium Way. This would provide locations for traders who need a more settled location than Market Square can provide, or services not available in it.
- b) Explore and if appropriate implement an indoor market, to extend the range of what can be offered.

## 9. Expected impacts including financial implications

### 9.1 Stall fees

It is necessary for the purposes of assessing practical and financial implications to define a starting point for stall fees for Market Square. In order to apply a fair yet commercial set of fees and charges, Northampton markets' most recent fees, a desktop survey of markets within a forty mile radius, correspondence with markets that have similar permanent stalls, a 2022 survey of markets conducted by Wakefield markets team, NABMA national markets survey 2022 and the recommendations of the Northampton Market Square Viability Study have been reviewed and taken into account.

Northampton's historic fees and charges were complicated and required a disproportionate amount of administration, comprising of different charges for each day and seasonality reductions for the 'kipper season' or leaner months of January to March.

Table 5 shows the mean average existing charges, Northampton Market Square viability study recommendations and the proposed charges for the market square per day, based on the findings of the information gathered and considering the use types suggested within the viability study. Careful consideration has been given to existing rental levels and ongoing commercial sustainability.

**Table 5: Proposed starting daily fees and charges per day**

Type	Proposed charges, £	
	Per stall	Per m <sup>2</sup> of stall
Demountable stalls	15	1.67
Fixed stalls	30	2.50
Mobile food units (pitch only)	30	N/A

Fees would change each year, and if necessary more frequently, typically reflecting inflation but also changes in demand and performance of traders. The rate for fixed stalls is set 50% higher than demountable stall per square metre, reflecting the additional benefits traders would receive from using them.

Electricity use would be covered by charges to traders. Where possible this will be metered, where this is not possible a reasonable approximation will be used to set a service charge.

Waste disposal would be charged to traders, where possible based on cost of disposal for each trader's waste, but where necessary based on reasonable approximations of waste disposal costs by

type of trading. Traders would be encouraged to re-use and recycle packaging and other materials, to reduce residual waste.

As referred to in 8.5(e), for start-up businesses lower rates would be offered.

## 9.2 Expected take-up

By creating a more attractive environment supported by removal of the negative factors and addition of positive actions, as well as the support from the Council's wider approach such as the opening of STACK, it is expected that take-up of stalls will increase, both initially and over time. Whilst it is not possible to be precise about these effects, those set out in Table 6 are considered reasonable. In preparing them, reference has been had to the scenarios from the Northampton Markets Viability Study. To be conservative, the lowest numbers have been used; it will be seen that even this requires the use of demountable stalls in the additional area. This model is based on achieving a total of 630m<sup>2</sup> (6,800ft<sup>2</sup>) of trading space. It is assumed this is achieved in the fifth full year (2029/30), with each year before that being 5% lower than the one before. Mobile food units are treated as having a nominal trading area of 9m<sup>2</sup> for these purposes. Of course, single traders may well use more than one stall.

**Table 6: Projected stall occupation over time**

Type	Max	Year				
		2025/26	2026/27	2027/28	2028/29	2029/30
Demountable stalls core area	19	19	19	19	19	19
Demountable stalls additional area	26*	9	10	11	13	17
Fixed stalls	16	16	16	16	16	16
Mobile food units (pitch only)	Circa 10	6	8	9	10	10

Note: \* This may be increased through the use of weighted stalls.

## 9.3 Income projections

The income projections in Table 7 are based on the occupancies shown in Table 6. For these purposes no inflation is allowed for, as this is uncertain and would affect both income and costs. The projections are based on the costs per stall or pitch per day given in 9.1 together with the assumptions as follows:

- 51 trading weeks per year.
- Mobile food units trade six days per week.
- Fixed stall traders five days per week.
- Traders from demountable stalls in the core area trade four days per week.
- Traders from demountable stalls in the additional area trade three days per week.

No net income is assumed from event or specialist markets.

**Table 7: Projected income over time, £k**

Type	Year				
	2025/26	2026/27	2027/28	2028/29	2029/30
Demountable stalls core area	58	58	58	58	58
Demountable stalls additional area	21	23	25	30	39
Fixed stalls	122	122	122	122	122
Mobile food units (pitch only)	55	72	83	92	92
<b>Total</b>	<b>256</b>	<b>275</b>	<b>288</b>	<b>302</b>	<b>311</b>

#### 9.4 Operating approach and costs

Estimated operating costs are shown in Table 8. These exclude (see below) additional costs for daily erection and dismantling of the demountable market stalls. The costs are based on the Council's draft 2024/25 budget, with a further inflationary 3% added, the 'vacancy factor' removed (this assumes some posts are vacant part of the time; this is impractical in a service such as the market), and a correction to the business rates costs based on the last rateable value of the market. Future business rates may be higher or lower but are likely to reflect, at least broadly, the performance of the market.

The staffing costs are based on the current staffing model (a Market & Urban Activities Manager, Markets Officer, and two Market Operatives. In practice some of the Manager and Officer's time is taken on non-market activities such as oversight of events on the Council's land. However, this may well be balanced by time from other staff in the Assets & Environment team and across the Council, such as Communications, supporting market activity.

Accordingly, the figure of £289k is used as a benchmark of the core cost of operating the markets.

**Table 8: Estimated core operating costs**

Cost area	£k
Business rates	26
Internal recharges	2
Maintenance and services	14
Marketing	5
Staff costs	211
Supplies	11
Transport	19
<b>Total</b>	<b>289</b>

However, as noted above, the vacant stalls on the market previously attracted anti-social behaviour. At the inception of the Market Square regeneration, the consultations and feedback from partners, including the Northampton Forward board, businesses and the public all highlighted this as an issue that could not continue into the reworked space. To help achieve this, the plan was the

demountable stalls would be erected and removed each day. Historic England also favoured the erection and dismantling of the stalls on a daily basis when contributing to the Market Square planning application.

The stalls will need to be stored and transported to and from site, erected by 6.30am and removed from 5.30pm up to seven days per week. To provide for this without efficiencies would be likely to require two additional operatives and associated equipment, at a cost in the over of £75k per year. Based on informal market soundings, this is comparable to the costs of achieving the same result by using a third-party contractor. However, it is considered that it should be possible to make efficiencies through greater internal alignment of services. A figure of £40k pa is therefore proposed as the net cost of enabling daily set-up and dismantling of the demountable market stalls. This would result in an overall market operating cost of £329k pa.

## 9.5 Overall financial impacts

It can be seen, based on Tables 7 and 8 and the discussion of additional costs of market break-down and set-up each day, there is a projected net loss of £73k in 2025/26, falling to £18k in 2029/30. Of course, given the number of factors which will affect success, both figures, and the net position in the intervening years, is liable to change, potentially significantly. However, as realistic position as possible has been presented. Subject to those caveats, Table 9 shows the expected yearly position (again, excluding inflationary effects).

**Table 9: Projected net cost (income) over time, £k**

Type	Year				
	2025/26	2026/27	2027/28	2028/29	2029/30
Total income	-256	-275	-288	-302	-311
Costs	329	329	329	329	329
Net position	73	54	41	27	18

Once the market is established in the regenerated Market Square, these figures will be reassessed and any necessary changes to the Council's medium term financial plan made.

## 10. Conclusions

The Council is seeking to capitalise on the valuable asset of the historic Northampton markets, coupled with the extensive investment in Market Square, Northampton, and the surrounding area. This development plan sets out a robust strategy for maximising opportunities to make the markets a success, not simply for their own sake but to help make central Northampton a vibrant and interesting place, building civic pride and identity.

## 11. Appendix A: Northampton Markets Development Plan Action Plan

This section sets out the actions needed to deliver the Development Plan. 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, 'PS' for Place Shaping, 'CM' for Communications, 'H&C' for Housing & Communities, 'RS' for Regulatory Services, 'H&T' for Highways & Transport, 'WS' for Waste.

No.	Service areas	Source	Action	Target delivery date	Resources
1.	A&E	8.2(a)	Regular markets will continue to be run by the Council, with the changes in approach outlined below.	Immediate	Staff time
2.	A&E	8.2(b), 8.6)	Procured operators of specialist and event markets.	As soon as possible	Staff time
3.	A&E	8.2(c)	After two to three years, the operation of both will be reviewed and consideration given to whether the results suggest further changes would be beneficial.	2026	Staff time
4.	RS, H&C	8.3(a)	Ensuring the Market Square and surrounding area is a focus for attention to proactively address anti-social behaviour, including through use of its neighbourhood wardens and by working with the Police.	Immediate	Staff time
5.	RS, WS	8.3(b)	Developing and implementing a strategy to remove visible commercial waste storage on and around Market Square.	As soon as possible	Staff time
6.	WS	8.3(c)	Ensuring there is a high level of cleansing of Market Square and its surroundings.	From reopening of Market Square	Refocusing of existing contracted resources
7.	A&E, H&T	8.3(d)	Ensuring there is rapid and effective repair of damage to the surface or fittings of Market Square.	From market reopening in Market Square	Staff time, approved budgets



No.	Service areas	Source	Action	Target delivery date	Resources
8.	A&E, PS	8.4(a)	Eligible trader support package	As soon as possible	Staff time, existing grant budgets.
9.	A&E	8.4(b)	Allow each eligible trader a period of six months prior to charging rent on demountable stalls and food concession pitches needed for their business.	From market reopening in Market Square	None.
10.	A&E	8.5(a)	Plan the layout and uses of stalls to address the expected patterns of movement, especially once STACK opens.	From market reopening in Market Square	Staff time
11.	A&E	8.5(b)	As appropriate, operate different days or zones, potentially branded as different markets, so that the attraction of the core market is not diluted.	From market reopening in Market Square	Staff time
12.	A&E	8.5(c)	Require traders to meet defined quality standards.	From market reopening in Market Square	Staff time
13.	A&E	8.5(d)	Give priority when allocating stalls to those market traders who submit a business plan.	From market reopening in Market Square	Staff time
14.	A&E	8.5(e)	Provide access to time-limited low-cost stalls for start-up businesses, including opportunities for university and college students.	2025	Staff time
15.	A&E	8.5(f)	Develop relationships with the University of Northampton Arts & Design and other relevant units, and similarly with Northampton and Moulton Colleges.	2025	Staff time
16.	PS, A&E	8.5(g)	Providing all traders who appear likely to benefit from it with business support provided by WNC's Economic Growth & Inward Investment team and partners.	From market reopening in Market Square	Staff time, existing grant budgets

No.	Service areas	Source	Action	Target delivery date	Resources
17.	CM, A&E	8.5(h)	Develop and sustain a strong social media presence for the markets.	From market reopening in Market Square	Staff time
18.	CM, A&E	8.5(i)	Develop a communications strategy for traders, including work to attract suitable traders.	Immediate	Staff time
19.	A&E	8.5(j)	If the actions described in this Plan are particularly successful, develop additional market zones in suitable places	2026	Staff time
20.	PS, A&E	8.5(k)	Use the BIPC business support programme or similar arrangements to provide business support for traders on the Northampton markets.	As soon as possible	Staff time, existing grants
21.	PS, CM	8.7(a)	Develop and implement a town centre events and animation strategy.	Immediate	Staff time, approved budgets
22.	PS, CM	8.7(b)	Intensify engagement with key stakeholders to secure the delivery of a varied and interesting events programme in and around the Market Square.	Immediate	Staff time, approved budgets
23.	A&E	8.8(a)	Develop proposals for semi-indoor market operation in Emporium Way.	2026	Staff time
24.	A&E	8.8(b)	Explore and if appropriate implement an indoor market	2027	Staff time

## 12. Appendix B: Lessons from elsewhere

### 12.1.1 *Leicester market*

Leicester traditionally had a large market, with mix of fixed and table top stalls in a covered area with an indoor market provision close by. This market has always been regarded in the industry as an exemplar. However, Leicester's vision for the future has seen significant investment to ensure it remains fit for purpose.

The Council embarked on a significant investment programme despite the markets' success and in 2014 a new £7 million food hall was opened to accommodate the fresh meat, fish, deli, and bakery businesses, replacing the run-down indoor market. In addition, the creation of a new high quality public square to stage specialist markets and events and festivals was completed in 2019, the purpose being to drive additional footfall, aiding the regeneration of the area. This was the first part in the transformation of the market area, phase two commenced in 2023 with a £7.5 million upgrade to the outdoor covered and fixed stalls area.

Leicester operates an excellent independent website promoting the traders and events and has active social media accounts with over 9,000 Facebook and nearly 10,000 followers on X (formerly Twitter).

### 12.1.2 *Stratford-Upon-Avon market*

Stratford-on-Avon District Council operates markets under two charters in different locations in the town, Friday and Saturday at Rother Street and Sunday by the river. In addition to this there are four further annual market events, including the very popular Victorian Christmas market.

All of the market operations are outsourced to LSD Promotions, which is in its second contract period having been successful in a competitive tender process. It provides the stallholders, infrastructure, and staff. It pays the council an operator's fee which is currently circa £170k per annum.

The four-day Victorian Christmas market, which uses many of the towns' streets, consists of over 320 stalls as well as side shows and funfair rides attracting many thousands of visitors. This market, which was introduced a few years ago, has become something of a victim of its own success, costing the council over £60k per year in hostile vehicle mitigation measures, security, and infrastructure. The council receives many complaints annually from local population due to the physical disruption it brings. However, anecdotally local businesses, especially the independents, see a significant uplift in sales whilst the market is operating.

### 12.1.3 *Warwick market*

In 2014, Warwick District Council offered the operation of Warwick market for tender with CJ Events the eventual winner. The market operates on Saturday only, when they took over there were under 20 traders, but now have anything between 90 and 145, depending on the time of year. CJ Events provides the stall holders, staff, and infrastructure.

The council sets the stall rents which are reviewed each year, with CJ Events paying the council a percentage of the rents collected. This is currently around £60k per annum.

This third-party operator has developed their model and added over 2,000 traders to their books, meaning that, as well as general markets, they are able to provide more specialist markets such as

food fairs, arts and crafts, and vintage markets. They also run markets in Kenilworth and Leamington Spa for Warwick DC, and now also operate Rugby BC's markets, as well as various event markets across the UK. A good website and social media presence enhances its offer.

#### *12.1.4 Coventry market*

Coventry market operates in a market hall constructed in 1958 as part of the post-war reconstruction of Coventry city centre. Its quirky, round construction has given it listed status. Little has changed in the years it has been opened and there are a number of multi-generational businesses operating there. Like Northampton's market it is held in high regard with the local population. However, it is facing an aging client base despite some newer, diverse stall offerings.

It maintains active Facebook pages, its own and a market trader site which has a good following. It also hosts exhibitions and small indoor events that are well attended.

#### *12.1.5 Kettering market*

Historically operated by the former Kettering Borough Council (KBC) in Kettering Market Place, the market was outsourced in the mid 1990's to try to rejuvenate it. Two separate operators tried with varying degrees of success but KBC took back control in the early 2000s and moved it to its current location in the main shopping street. The plan had not been to keep it in this location, but the traders preferred it and noted an increase in business.

The market declined over time and Covid took a toll. Free rent was given but this had little effect. The operation of the market was passed to the newly formed Kettering Town Council (KTC) in 2022.

KTC introduced modest charges and have introduced a series of events to keep the space animated throughout the year. Various themed markets such as food fairs, arts/crafts and Christmas have proved a success with the latter being oversubscribed. KTC is also beginning to use social media to promote these as well as trader focus features.

Footfall is not measured in the area but anecdotally the current traders are happy and are sustained by current levels. The event markets, on the whole, are well attended. However, of note, CJ Events delivered an arts and crafts market for them in 2022 but declined to return in 2023 due to lack of interest from their traders. KTC feels it is because the stall fees were too high.

#### *12.1.6 Milton Keynes market*

When Milton Keynes was created as a new town in the late 1960's, a market was not part of the plan. This was rectified in the early 1990's when a private operator was invited to start one on its current site just outside Centre: MK. This market is predominantly comprised of low-quality shuttered units but despite their quality, they have good occupancy levels, driven by the regular footfall the centre delivers. Most recently operated by Bray Associates Ltd on behalf of Milton Keynes Council for approximately 30 years, the market has had reasonable success. However, control has recently been taken over by the local authority in conjunction with Milton Keynes Development Partnership (MKDP, a council-owned entity). Some investment is required but as Bray Associates Ltd only had a three-year rolling contract it was reluctant to invest with no guarantee of future tenure. This is not seen as failure but instead the partnership is taking the opportunity to take control and to invest in infrastructure with an eye on future requirements.

Whilst Centre: MK has low vacancy rates in comparison to most other areas, what it lacks is an independent offer and this will be the focus for the market going forwards. A new market 'brand' is being developed and an improved social media presence is starting to gain traction.

Interestingly, a year-long experiment with a different operator tasked with creating a more upmarket, artisan food offer did not work with most of these traders reporting poor sales. Despite heavy promotion and its prominent location, it is felt that the big chain restaurants already present in Centre: MK retained the available custom.

#### 12.1.7 Loughborough market

Loughborough market was granted a royal charter in 1221. It operates as a street market in the centre of the town, with the area being expanded when the A6 was diverted from the core of the town. Operating on Thursday and Saturday it still appears to be successful, as does Loughborough town centre as a whole, with very few vacant shops evident. This reflects substantial growth in the town and the presence of Loughborough University very close to the town centre. Strong ties with the University contribute to the success of the markets, with students trading on and using the market for some of their needs. Vintage clothing markets are proving extremely popular for the student population which is leading to increased use of the regular market. There are over 130 businesses currently being operated by students in the vicinity, some of whom have regular market stalls. Recent new management is looking to strengthen this relationship and has taken on a Digital Marketing & Web Design student as a work placement apprentice as part of their degree.

#### 12.1.8 Nottingham markets

There has not been a traditional market in Nottingham's Old Market Square for over 50 years. Nottingham's weekly markets are held in various locations across the city, as shown in Table 2.

**Table 2: Nottingham traditional markets by location and day of operation**

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Bulwell		✓	✓		✓	✓
Clifton					✓	✓
Clinton Street	✓	✓	✓	✓	✓	✓
Hyson Green			✓			✓
St Ann's		✓				
Victoria Centre	✓	✓	✓	✓	✓	✓

These are all 'general markets' with the anchor for each one being fresh produce, the flagship being Bulwell which is about six miles from Nottingham city centre. All but Clifton and the Victoria Centre are located in neighbourhood centres. Most suffer from a lack of investment and are tired. The Victoria Centre market within the city centre is of poor quality and has seen a downward trend in traders and footfall. The City Council is considering its future. £20million of Levelling Up funding has been secured for Bulwell, some of which will be used to regenerate the market.

There are, however, a number of special events markets held each year in Nottingham's Market Square. This Square had become dilapidated and was extensively refurbished, re-opening in 2007. Key features being a single tier of flexible space for markets, events and activities, a bold water feature with jet fountains and waterfalls and active tiered dwell space, along with greenery and attractive public realm features.

An active events programme is a key principle of the management of the Square. In 2018, there were only 42 days where there was no activity on the Square. This drives considerable footfall into the area, particularly the Christmas Fair, benefitting the local economy. These events are licenced under Royal Charter by the markets team but are administered by a separate events team.

#### *Norwich market*

Norwich market place was rebuilt in 2006. It is an outdoor market with 189 fixed, permanent steel shuttered units laid out in parallel rows in a prominent central location. The market trades from Monday to Saturday, with some traders opening on Sundays as well.

In 2019, occupancy was 79%. A strategy focusing on expanding the street food and pop-up offer has since seen occupancy increase to 91%. These traders use the existing fixed stalls.

There is a strong focus on the street food offer, now with 24 street food and more traditional cafe food offers available. 19 fresh food retail stalls are also available, including greengrocers, butchers, and a range of packaged goods. Other offers include service businesses, predominantly hair and beauty.

Limited fixed seating is provided to the north of the market which, combined with the fixed stall layout gives little flexibility to host events and activities.

#### *12.1.9 Altrincham market*

Altrincham's charter dates back to 1290. Situated at the intersection of the fertile Cheshire farm belt and the commercial commuter zone of Manchester the town has a long and important history.

With redevelopment starting in 2014, Altrincham Market is now at the heart of the re-invention of the town following circa £40million investment in the public realm. The Market House has been converted into a "permanent gusto hub and canteen where people can eat from a variety of top notch food slingers"<sup>5</sup>. Weekends host the very popular themed markets covering regional food producers, vintage fashion and furniture, home house and garden, and contemporary craft.

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<sup>5</sup> According to *Olive* magazine.

## 13. Appendix C: Market operating models

The CLG report<sup>6</sup> identified the following market operating models.

**Local authority managed** – Assures accountability giving the ability to link the market in with the Councils' wider strategic goals, but potentially less flexible or able to adapt to current market forces. The large majority of markets are still directly provided and managed in this way although there is no statutory requirement to provide the service.

**Fully privately managed** – This option ensures the ability to respond proactively to changes and raise investment capital, it also aids focus on the core business and has the advantage of reduced bureaucracy. It is usually permitted under licence from the local authority.

### Worthing Seafront Market

The Worthing Town Centre Initiative is a community interest company with an objective to enhance Worthing and to provide a vibrant and exciting town centre. Its aims include increasing footfall and helping to ensure that the businesses that choose to trade in Worthing are successful.

The town centre partnership's aim was to use a rejuvenated market as a catalyst to bring Wednesdays back to life in the town, increase footfall and allow the market to become a feature of the shopping week. This would also have a spin-off benefit for the shops within the town to increase their custom.

Following a tendering process, Town & Country Markets were selected to develop the market. Working in partnership with Worthing Town Centre Initiative, the private market operator introduced a new Wednesday market near the sea-front area of the town.

Before the market moved into Montague Street, Wednesday was the quietest trading day of the week with an average of 11,000 shoppers; since the market started there has been an increase to an average of 18,000 shoppers each Wednesday making it the second busiest day of the week in terms of footfall.

**Partnership model** – These can range from the local authority retaining the strategic management of its markets but outsourcing the operational management, to a formal medium to long-term joint venture between the public and private sector. These models are useful where the local authority lacks the in-house capacity and capability to effectively manage the markets, or where external capital investment is required.

A variation on this model is the emergence of public-public joint venture companies whereby local authorities at a sub-regional or city-region level transfer the management of their markets into a separate company. This not only has the potential to create economies of scale and increased purchasing efficiency but also can allow for strategic planning.

### Liverpool City Council joint venture

Faced with a market portfolio operating at a significant loss, a need for capital investment, a lack of in-house expertise and a desire to expand the range of markets on offer, Liverpool City Council undertook a 'best value' review of its markets service. The outcome of this was a decision to seek a formal partnership with an external provider.

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<sup>6</sup> Retail Markets Management models, CLG, 2010.

Following a formal tendering process, Geraud Markets UK was selected as the preferred partner. A joint venture company was set up with board of directors from Geraud Markets and the City Council. The management of the council's market portfolio was transferred to the company.

Since the market partnership was established significant progress has been made:

The operation no longer trades at a loss and has returned to a small annual surplus.

There has been significant investment into the outdoor markets infrastructure (stalls and chalets).

There is now an extensive specialist and farmers' market offer in the city.

**Arms-length LLP** – This model offers the advantage of reduced bureaucracy and costs, an increased focus on the core business, and the opportunity for directly raising investment capital.

### Glasgow City Council

Faced with a need for significant capital investment into its markets portfolio, Glasgow City Council decided to establish a limited liability partnership. This was a model that the council had already used for other council services and offered the advantage that an over-arching management framework was already in place.

The board of directors of City Markets (Glasgow) LLP currently consists of four elected members (councillors) and two officers. The council retains ownership of the assets (the wholesale market) but has transferred them to the partnership under long-lease arrangements. A management agreement for the delivery of retail markets has also been set up.

Since the arrangements were put in place there has been:

Capital investment of £6.5m by the council in essential repairs to the wholesale market

Additional external capital is being sought through the EU Joint European Support for Sustainable Investment in City Areas initiative.

Expansion of the retail market offer in the city.

Other models include:

- **Trader operated** – There are a number of traditional and farmers' markets that are directly managed by the traders themselves. This offers the advantage of reduced bureaucracy and costs, and an increased sense of ownership by the traders.
- **Social enterprise** – Privately operated but reinvestment of profits, usually with a focus on ethics.
- **Voluntary sector** – Some markets, usually community-focused, infrequent, and relatively small-scale, are managed by volunteers. This has the advantage of creating a sense of community ownership of the market as well as reducing operational costs.
- **Shared management** – The CLG Select Committee Report on retail markets recognised the potential benefit of small markets/town and parish councils sharing the costs of employing a more senior and experienced market manager to run a portfolio of markets.





# WEST NORTHAMPTONSHIRE COUNCIL CABINET

7<sup>TH</sup> MAY 2024

## LEAD MEMBER FOR CHILDREN'S SERVICES, EDUCATION AND SKILLS – COUNCILLOR FIONA BAKER

<b>Report Title</b>	<b>Special Educational Needs &amp; Disabilities (SEND) and Alternative Provision (AP) Transformation Programme</b>
<b>Report Author</b>	<b>Rebecca Wilshire, Director of Children Services Ben Pearson, Assistant Director, Education</b>

<b>Contributors/Checkers/Approvers</b>		
<b>West MO</b>	Catherine Whitehead	3/5/2024
<b>West S151</b>	Martin Henry	1/5/2024
<b>Other Director/SME</b>	Stuart Lackenby, Exec Director for People Services	26/4/2024

### 1. Purpose of Report

- 1.1. This report provides and update to the next steps in our journey of improvement for all children to ensure we meet our ambition to give them all the Best Start in Life. The report demonstrates West Northants next steps and commitment in ensuring services to children with Special Educational Needs/Disabilities (SEND) receive additional investment that will help us improve at pace and prioritise the Councils SEND and Alternative Provision strategy 2023 - 2026.
- 1.2. The Council is not able to meet the increasing demand around SEND with in its existing staffing structures and model of delivery and so is not effective in meeting its statutory duties in this area. While this is a national problem, we recognise the need to respond locally to ensure our children have improved outcomes and access to and an education that facilitates that.
- 1.3. The purpose of this report is to seek approval for additional funding to enable the Council to better meet the current SEND demand and to implement an improved service that delivers better outcomes for children, young people, and their families and also provides more support to our schools.

- 1.4. This report aims to set out the significant improvements that we are targeting and that we believe will ensure that in future children in West Northants have their needs met and are supported to reach their full potential.

## 2. Executive Summary

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- 2.1 In summer 2023 the Council through its SEND partnership coproduced with local children and their families the West Northants SEND and AP Strategy 2023 to 2026. This was approved by WNC Cabinet on 11 July 2023.
- 2.2 In co-producing this strategy, the Council heard the experiences of children and their families. Some of these experiences fell short of the Councils ambition and expectation around how support should be provided. Over 300 different events and feedback session have taken place to ensure that current and future services are informed by children and family’s voices and their needs.
- 2.3 We have a lot of work to do improve our services and have commenced our improvement, Journey. As a service, there has already been investment in a SEND Improvement Team and earlier this year an increase in Educational Psychology capacity. The work of our SEND Improvement Board over the last 18 months has started to improve and transform both the service and the partnership working but this is not enough to make a difference to children now.
- 2.4 The Council is not able to meet the increasing demand and complexity around SEND with in its existing staffing structures and model of delivery. This increase in demand can be summarised as;
- 33% increase in requests for assessment
  - 40% increase in EHCPs since WNC was created
  - 15% increase in SEN Support
  - 12% increase in children in need (including Child Protection)
  - 200% increase in referrals to Autism Spectrum Disorder/ADHD team for assessment
  - Special School Nursing caseload increase of 74%
- 2.5 The impact of this increase is that the Council is not effective in meeting its statutory duties in this area. This includes providing statutory assessments of children and finalising Education, Health, and Care Plans (EHCPs) within statutory timescales.
- 1.1. The purpose of this report is to seek approval for the use of funding as described in section 6 of this report to enable the Council to manage the current SEND demand and to implement an improved service that delivers better outcomes for children, young people, and their families. This improvement will be focused upon 3 programmes of work;
- 1.2. **1. Slowing demand for new EHCP requests and ensure children are supported and identified early** - Through investment into a SEND Specialist Teaching Service, which will be deployed in schools to work with the SENCO/School leaders, class teachers and teaching assistants to offer advice and support about developing and improving SEND curriculum and practice. The Specialist Teacher Service will be made up from expert SENCOs – people with the ability to challenge and support schools and model good practice. There is clear national best practice through the DFE “Safety Valve” programme that many families escalate to needing an EHCP as the only way they feel they can secure the support they need and because they have reached crisis point. This new capacity will follow national best practice by identifying needs early on and providing the right support to help keep children at school and in education.

- 1.3. **2. Improving the Quality and Timeliness of EHCP's** - Through additional EHCP coordinator capacity and the creation of a new team solely focused on meeting the statutory assessment timescales (20 weeks). This dedicated team will mean a clear focus on the quality of new plans and completion within timescales. This team will have the expertise and the time to hold others accountable and challenge poor advice to ensure the plan is not just timely but is also accurate and of high quality. We also plan to improve the communication with parents and families ensuring there are more regular check-ins as we recognise that communication and "staying in touch" is something that our parents tell us we need to be better at.
- 1.4. **3. Improve the commissioning and oversight of specialist provision** – Through the creation of additional commissioning capacity the Council will be able to improve how the partnership commissions and quality assure specialist provision that children with SEND attend. This includes Alternative Provision, Out of County specialist placements and residential placements.
- 1.5. Alongside these 3 programmes of work the proposed funding will also create additional leadership capacity which will support a restructured workforce that is capable and sufficient to meet current and future demand.
- 1.6. West Northants SEND Partnership was inspected by Ofsted during March this year. The proposal set in this report will enable the Council to kick start its activity against the recommendations from the inspection which will be published shortly.

### **3. Recommendations**

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- 3.1 It is recommended that the Cabinet:
  - a) Approve the implementation of the SEND and AP Transformation Programme as described in this report including the delegation for the usage of £1.35m of Exceptional Financial Support to Executive Director People, in consultation with the Cabinet member for Children to fund the interventions described in section 6 of this report.

### **4. Reason for Recommendations**

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The recommendations enable the Council to ensure that they are meeting their statutory duties as set out in Legislation and Law relating to the SEND Reforms of 2014 and more recent SEND and AP Improvement Plan Reforms of March 2023 by increasing the capacity of the service to meet the current levels of demand.

Ensure that service improvement happens at pace and that children and young people with SEND have their needs identified early and fully met, so that every child can meet their full potential.

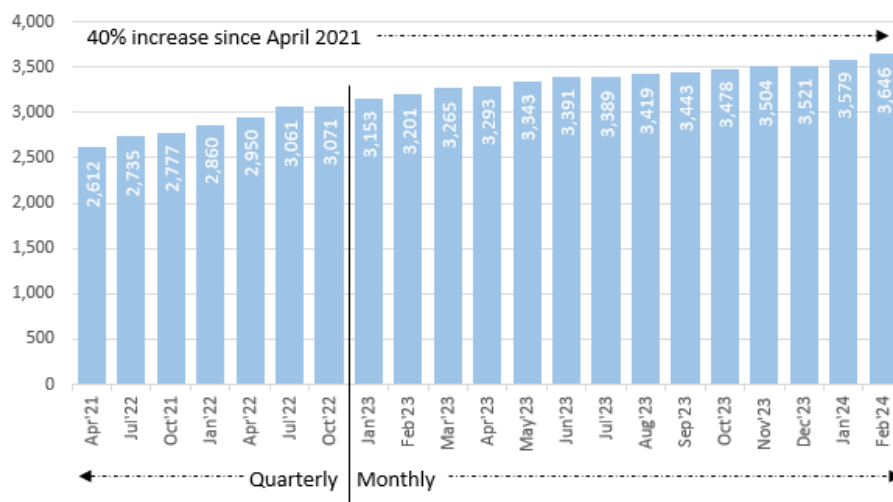
### **3. Report Background**

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- 4.1. The demand for EHCPs has continued to rise since the creation of West Northants Council. To manage the growth in demand for EHCPs there are several changes that need to be made, which will be covered within this proposed transformation.

- 4.2. As the demand has increased by (40%) the ability to meet timescales and deliver a quality service has decreased.
- 4.3. In April 2023, a SEND Improvement Team was development which has had an impact on the service ability to improve as well as the partnership.
- 4.4. Due to significant backlog of those waiting for Educational Psychologist (EP) assessments, and there being national issues with recruiting EPs additional finances were agreed in September 2023 for a team to be established to work through those children who were waiting. Due to national shortages of EP this team was not mobilised until February 2024 but are already having an impact.
- 4.5. Delayed assessment and plans, mean children do not have their needs met, the appropriate school cannot be located, and this can lead to high-cost special school places and schools out of area. This needs to improve to ensure the right child has the right school place, and as near to home as possible.
- 4.6. Statutory duties are not effectively being met cand this is leading to a significant increase in tribunals, complaints, and ombudsman direction, all creating avoidable additional cost for the Council. Over the last two year this impact has been £140,237 (2022-2023 - £75,003 / 2023-2024 - £65,234).
- 4.7. The purpose of this report is to seek approval for additional funding as described in section 6 of this report to enable the Council to manage the current SEND demand and to implement an improved service that delivers better outcomes for children, young people, and their families. This improvement will be focused upon 3 programmes of work;
- 4.8. **1. Slow the demand for new EHCP requests.** The 40% increase in demand for EHCPs since April 2021 is larger than in most other Councils nationally. It is likely that there will continue to be an increase in requests for new EHCPs so this will continue to increase. However, by investing in specialist early help services, as outlined below, this rate will reduce.

**Education Health Care Plans**



- 4.9. This is due to the lack of an effective early help offer in West Northants, and the inconsistent approach by schools to identify, assess and support needs early. The implementation of our Family Hubs and early help redesign will contribute to improvement in this area. But more is needed in Schools.

- 4.10. Through investment into a SEND Specialist Teaching Service, which will be deployed in schools to work with the SENCO/School leaders, class teachers and teaching assistants to offer advice and support about developing and improving SEND curriculum and practice. The Specialist Teacher Service will be made up from expert SENCOs – people with the ability to challenge and support schools and model good practice.
- 4.11. It is intended that the impact from this will be to develop inclusive practice in schools to ensure early help and support is available as early as possible to ensure that children’s needs are met effectively and that needs do not escalate. More timely intervention will also ensure that the number of requests for EHCPs is reduced and SEND support increased ensuring pupils get the support at the right time.
- 4.12. This intervention this will start to slow down some of the demand, this service will work with schools and teachers to support early identification (aimed significantly at Early Years settings and Primary Schools). When needs start to emerge, instead of a ‘Request for Assessment’ being completed, schools will work with the specialist teaching service to develop ways of working with children, developing strategies, and managing behaviours preventing requests for assessment begin submitted for some children.
- 4.13. This approach should address the mismatch in increases in demand, where we have seen over 40% increase in EHCPs yet only a 15% increase in children identified with SEN Support in schools.
- 4.14. The SEND Specialist Teacher Service will work with school leaders and staff, partners and families to ensure that the SEND ranges are being used effectively and to upskill as many people as possible to identify needs as early as possible manage emerging needs and early identification using and requests for assessments are when these criteria is clearly met and not linked to getting a service.
- 4.15. **2. Improving the Quality and Timeliness of EHCP’s** - This transformation programme will address the caseload issue within the EHCP Team and the additional assessments which will come through as the Educational Psychology Service work to clear the backlog of assessments.
- 4.16. Manageable caseloads will ensure time is spent on quality of assessments, accurate assessments and children needs being addressed and support early reducing complaints, tribunals, ombudsman orders, and ensure children are safeguarded and their needs are being met within the right provision. The table below shows the current average caseloads in WNC compared to regional Councils and the DfE view of appropriate averages. There is not sufficient capacity within WNC to meet the current demand for assessments and ongoing reviews of EHCPs. This lack of capacity directly leads to the poor quality of EHCPs and poor timeliness which were identified by the local partnership.

**Table 2 – EHCP average caseloads**

	DfE benchmark	Leicester City (19FTE)	North Northants (25FTEs)	WNC Current (14FTEs)
EHCPs		3,850	3,800	3,504
Average per caseworker	150-200	202	150	250
Ongoing EHCP assessments			450	520
Average per caseworker	25	27	16	37

- 4.17. By meeting our statutory duties to issue EHCPs on time, we will avoid risks of complaints and tribunals which often lead to compensation or expensive provision being directed for the Council. This will also significantly reduce the number of complaints and tribunals the Council receives about not meeting our timeliness duties.
- 4.18. By meeting our timescales, needs of children are formally assessed and support provided to further meet needs within education, which in turn will reduce exclusions and permanent exclusion which occurs when behaviours in school can't be managed.
- 4.19. EHCPs can only be finalised if all advices are received on time (this includes advice from any education, health and care professionals)
- 4.20. This programme will create a new team solely focus on meeting the statutory assessment timescales (20 weeks). A dedicated team will mean a clear focus on the quality of new plans and completing these within timescales. This team will have the expertise and the time to hold others accountable and challenge poor advice to ensure the plan is not just timely but is also accurate and of high quality.
- 4.21. This team will ensure EHCPs are accurate and robust, which means children will have they needs met quickly and appropriately. Support for schools will be available from the SEND Specialist Teacher Service (included in this bid) to work with them as needed to meet child's needs, preventing suspensions, permanent exclusions and supporting school to remain inclusive and preventing the need for special schools (unless the plan has identified this need).
- 4.22. Having a team just to focus on the new 20-week assessments, will allow the current teams to focus on the timeliness and quality of annual reviews (statutory responsibility for the Council). This new structure will also ensure the EHCP team focus on transition points for children. For example, the review in primary before transitioning to secondary needs to be fully reviewed and robust, to ensure needs of children are updated and transitions are supported. We see too many requests for new EHCP for children as they are about to move to secondary school (Year 6) and children not having their needs identified until in secondary school which is far too late and will have already led to difficulties in school. Many of these children have poor attendance at secondary school or are missing out on education as there is not suitable provision to meet their needs.
- 4.23. By meeting timescales and ensuring plans are robust, high quality and meeting the child's needs, this will reduce the complaints, ombudsman orders and tribunals statutory duties will be met, and children needs will have been prioritised and met. This will support the management of the DSG budget and Council budgets.
- 4.24. **Improve the commissioning and oversight of specialist provision** - Through the creation of additional commissioning capacity, the Council will be able to improve how the partnership commissions and quality assure specialist provision that children with SEND attend. This includes Alternative Provision, Out of County specialist placements and residential placements.
- 4.25. The Council does not effectively broker or negotiate specialist provision which enables providers to inflate price and determine the quality of provision. By investing in a new service, this will enable the Council to assure itself of the safeguarding arrangements for children, and to drive down costs.
- 4.26. **Outcomes** - This transformation bid is aligned to address these areas, creating improvement at pace, address the backlog, improve practice, and performance and address commissioning and brokerage, as well as creating stability and sustainability. Specifically, the outcomes which will be archived by this programme are set out below:
- Improved identification and assessment of children's needs, enabling them to reach their full potential as young people and as adults.

- Statutory duties will be met, reducing the number of Tribunals, Ombudsman escalations and complaints, which will impact on outcomes and finance pressures.
- Support services will be improved and provide schools support to identify needs and address needs early, increase SEN support, slowing down/bringing down EHCP requests, reducing suspensions and exclusions, improving outcomes for children, especially at transition points (primary school to secondary school and transition from children’s services to adult services).
- Improve working relationships with parents, carers and families which will improve the reputation of the council locally, nationally including publicly
- Improved quality of EHCPs which will enable children to get the right support early, preventing escalating of need and preventing families hitting crisis leading to the need for statutory services
- Improved management of commissioning and brokerage, allowing greater oversight and challenge of funding, placements, and providers to ensure Value For Money
- Improve financial sustainability for Council budgets and DSG

4.27. West Northants SEND Partnership was inspected by Ofsted during March this year. The proposal set in this report will enable the Council to kick start its activity against the recommendations from the inspection which will be published shortly.

#### **4. Issues and Choices**

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4.0 The Service has had initial investment to address some areas like Education Psychology, but this programme is required to address all areas for improvement. Doing nothing is not an option.

#### **5. Implications (including financial implications)**

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##### **5.0 Resources and Financial**

5.1 The funding for this programme of change in the main, is through Exceptional Financial Support (EFS) from Government by means of a ‘Capitalisation Direction’ which has been allocated to the Council, in line with the Councils submission.

5.2 The Council was successful in securing a total of £6.6m of EFS from Government covering a range of transformational activity within children’s services which will enable the council to improve service provision and reduce the cost of demand for services through early intervention over the medium-term horizon. The direction allows for the Council to fund transformational and service improvement activity through capital receipts / borrowing in line with the proposals submitted and approved by Government. The funding needs to be fully utilised within 2024/25.

5.3 The total cost of this particular proposal for 2024/25 is £1.35m, with the sources of funding set out below,

	<b>2024/25</b>
EFS - SEND Transformation Proposal	944,661

EFS - Triage Services Proposal	29,177
EFS - Early Help Hubs Proposal	378,375
External Funding (St Andrews)	33,205
<b>Total funding requested</b>	<b>1,352,214</b>

- 5.4 The split of funding identified above shows how staff roles can be covered through a number of different proposals within the EFS.
- 5.5 This planned transformation programme activity is pertaining to children with SEND specifically, but also contributes to the wider prevention and early intervention work that will be delivered through our early help hubs. This includes dedicated officers to support children who are currently not attending school, are electively home educated and those at risk of exclusion.
- 5.6 The proposed enhanced work with schools and other partners will provide targeted early help and although the new staff will predominantly work within education settings, they will also be part of the integrated early help hub offer. The creation of geographically based EHCP teams within the transformation bid will also enable these staff to work at locality level within the early help hubs.
- 5.7 The external funding identified has already been received for the Council and is linked to the transfer of commissioning responsibilities for the local St Andrews Unit. This funding is being used to recruit an additional Commissioning Officer to manage this contract.
- 5.8 It is recognised that there is likely to be an ongoing budget requirement into 2025/26 and beyond from this proposal. This requirement will be reviewed through an in-year Star Chamber process which will influence what costs will continue to be funded into 2025/26 through the budget setting process.
- 5.9 It should also be noted that the Council is set to receive an additional £7.3m of capital funding from the Department for Education in 2024/25 to support our programme of creating new specialist school places. This funding will be used as part of the transformation programme to invest in specialist places, including Alternative Provision to meet needs of children who cannot attend mainstream school. The Council will invite local schools and providers to bid for funding to meet the growing demand we have.
- 5.10 **Risk**
- 5.10.1 This report clearly demonstrates the improvements required in relation to SEND and AP. If we are unable to take forward such improvements, there will be further detriment to children and their families.
- 5.10.2 If the programme is not supported, there is a significant reputation risk to council, continued expenditure with tribunals, compensation via ombudsman and complaints, if children services continue not make improvements, then DfE could explore alternative measures.
- 5.11 **Consultation and communication**
- 5.11.1 The service has consulted children, young people and their families around the SEND and AP Strategy, which includes our commitment to continue to co-produce with all partners. The work today has been co-produced and co-designed and the concerns we are looking to address are echoed from our families as being needed.



5.11.2 A comprehensive communications plan will be developed to provide timely updates relevant to the progress of the SEND transformation ensuring key stakeholders are aware at each milestone. As part of the SEND improvement journey, communications will continue to be transparent and timely so stakeholders are kept well informed of progress being made, as well as continuing to work closely with West Northants Voices Partnership to ensure parents, families and supporting organisations are aware of changes and developments

## 5.12 **Consideration by Overview and Scrutiny**

5.12.1 This has not been to Overview and Scrutiny.

## 5.13 **Climate Impact**

5.13.1 The service is aware of the importance of climate change, and aware of emissions associated with children being in school not suitable or local, and who require transport impacting on our carbon footprint. Having schools locally and more school places which have a positive impact on this area.

## 5.14 **Community Impact**

5.14.1 The implementation of this programme of work will support inclusive school and inclusive communities.

## 6. **Legal**

6.0 The SEND Code of Practice, under part 3 of the Children and Families Act 2014, sets out the legal requirements and duties placed on local authorities to provide for children and young people with special educational needs. The Council's SEND and Alternative Provision Strategy 2023 - 2026 sets out how we will deliver this duty.

6.1 S112 of the Local Government Act 1972 allows a local authority to appoint such officers as are necessary for the proper discharge of its functions (in this case the delivery of provision for children and young people with special educational needs), on such reasonable terms and conditions as it thinks fit.

## 7. **Background Papers**

7.0 SEND and AP Improvement Plan - [Special Educational Needs and Disabilities \(SEND\) and Alternative Provision \(AP\) Improvement Plan \(publishing.service.gov.uk\)](#)

7.1 SEND & AP Strategy [SEND strategy | West Northamptonshire Council \(westnorthants.gov.uk\)](#)

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