



# WOKINGHAM BOROUGH COUNCIL

A Meeting of the **EXECUTIVE** will be held in David Hicks 1 - Civic Offices, Shute End, Wokingham RG40 1BN on **THURSDAY 14 MARCH 2024 AT 7.00 PM**

A handwritten signature in black ink, appearing to read 'Susan Parsonage', written in a cursive style.

Susan Parsonage  
Chief Executive  
Published on 6 March 2024

**Note:** Members of the public are welcome to attend the meeting or participate in the meeting virtually, in accordance with the Council's Constitution. If you wish to participate either in person or virtually via Microsoft Teams please contact Democratic Services: [Democratic.services@wokingham.gov.uk](mailto:Democratic.services@wokingham.gov.uk)

The meeting can also be watched live using the following link:  
<https://youtube.com/live/h90nTtDqzH4?feature=share>

This meeting will be filmed for inclusion on the Council's website. Please note that other people may film, record, tweet or blog from this meeting. The use of these images or recordings is not under the Council's control.

<b>Our Vision</b>
<b><i>A great place to live, learn, work and grow and a great place to do business</i></b>
<b>Enriching Lives</b>
<ul style="list-style-type: none"> <li>• Champion excellent education and enable our children and young people to achieve their full potential, regardless of their background.</li> <li>• Support our residents to lead happy, healthy lives and provide access to good leisure facilities to enable healthy choices for everyone.</li> <li>• Engage and empower our communities through arts and culture and create a sense of identity for the Borough which people feel part of.</li> <li>• Support growth in our local economy and help to build business.</li> </ul>
<b>Providing Safe and Strong Communities</b>
<ul style="list-style-type: none"> <li>• Protect and safeguard our children, young and vulnerable people.</li> <li>• Offer quality care and support, at the right time, to reduce the need for long term care.</li> <li>• Nurture our communities: enabling them to thrive and families to flourish.</li> <li>• Ensure our Borough and communities remain safe for all.</li> </ul>
<b>Enjoying a Clean and Green Borough</b>
<ul style="list-style-type: none"> <li>• Play as full a role as possible to achieve a carbon neutral Borough, sustainable for the future.</li> <li>• Protect our Borough, keep it clean and enhance our green areas for people to enjoy.</li> <li>• Reduce our waste, promote re-use, increase recycling and improve biodiversity.</li> <li>• Connect our parks and open spaces with green cycleways.</li> </ul>
<b>Delivering the Right Homes in the Right Places</b>
<ul style="list-style-type: none"> <li>• Offer quality, affordable, sustainable homes fit for the future.</li> <li>• Ensure the right infrastructure is in place, early, to support and enable our Borough to grow.</li> <li>• Protect our unique places and preserve our natural environment.</li> <li>• Help with your housing needs and support people, where it is needed most, to live independently in their own homes.</li> </ul>
<b>Keeping the Borough Moving</b>
<ul style="list-style-type: none"> <li>• Maintain and improve our roads, footpaths and cycleways.</li> <li>• Tackle traffic congestion and minimise delays and disruptions.</li> <li>• Enable safe and sustainable travel around the Borough with good transport infrastructure.</li> <li>• Promote healthy alternative travel options and support our partners in offering affordable, accessible public transport with good transport links.</li> </ul>
<b>Changing the Way We Work for You</b>
<ul style="list-style-type: none"> <li>• Be relentlessly customer focussed.</li> <li>• Work with our partners to provide efficient, effective, joined up services which are focussed around our customers.</li> <li>• Communicate better with customers, owning issues, updating on progress and responding appropriately as well as promoting what is happening in our Borough.</li> <li>• Drive innovative, digital ways of working that will connect our communities, businesses and customers to our services in a way that suits their needs.</li> </ul>
<b>Be the Best We Can Be</b>
<ul style="list-style-type: none"> <li>• Be an organisation that values and invests in all our colleagues and is seen as an employer of choice.</li> <li>• Embed a culture that supports ambition, promotes empowerment and develops new ways of working.</li> <li>• Use our governance and scrutiny structures to support a learning and continuous improvement approach to the way we do business.</li> <li>• Be a commercial council that is innovative, whilst being inclusive, in its approach with a clear focus on being financially resilient.</li> <li>• Maximise opportunities to secure funding and investment for the Borough.</li> <li>• Establish a renewed vision for the Borough with clear aspirations.</li> </ul>

## MEMBERSHIP OF THE EXECUTIVE

Stephen Conway	Leader of the Council and Executive Member for Housing
Prue Bray	Deputy Leader and Children's Services
Rachel Bishop-Firth	Equalities, Inclusion and Fighting Poverty
David Cornish	Business and Economic Development
Lindsay Ferris	Planning and Local Plan
Paul Fishwick	Active Travel, Transport and Highways
David Hare	Health and Wellbeing and Adult Services
Ian Shenton	Environment, Sport and Leisure
Imogen Shepherd-DuBey	Finance

ITEM NO.	WARD	SUBJECT	PAGE NO.
103.		<b>APOLOGIES</b> To receive any apologies for absence.	
104.		<b>MINUTES OF PREVIOUS MEETING</b> To confirm the Minutes of the Meeting held on 22 February 2024.	7 - 14
105.		<b>DECLARATION OF INTERESTS</b> To receive any declarations of disclosable pecuniary interests, other registrable interests and any non-registrable interests relevant to any matters to be considered at the meeting.	
106.		<b>STATEMENT FROM THE LEADER</b>	
107.		<b>PUBLIC QUESTION TIME</b> To answer any public questions  A period of 30 minutes will be allowed for members of the public to ask questions submitted under notice.  The Council welcomes questions from members of the public about the work of the Executive  Subject to meeting certain timescales, questions can relate to general issues concerned with the work of the Council or an item which is on the Agenda for this meeting. For full details of the procedure for submitting questions please contact the Democratic Services Section on the numbers given below or go to <a href="http://www.wokingham.gov.uk/publicquestions">www.wokingham.gov.uk/publicquestions</a>	
107.1		Peter Must has asked the Executive Member for Active Travel, Transport and Highways the following question:	

**Question:**

At the meeting of Council on 19 January 2023 I asked the Executive Member for Active Travel, Transport and Highways what was happening with the draft Borough-wide Parking Management Action Plan.

He told me that a pilot consultation on parking management had been conducted 1 December 2022 and that similar pilots and consultations were being rolled out elsewhere in the Borough.

He concluded by saying that this approach was a better way of understanding parking needs in different parts of the Borough before moving on to a Borough wide approach and that these would be developed in the course of the year.

Could the Executive Member say how these pilots have progressed and how near the Council is to integrating the findings into a Borough-wide Parking Management Action Plan.

108.

**MEMBER QUESTION TIME**

To answer any member questions

A period of 20 minutes will be allowed for Members to ask questions submitted under Notice

Any questions not dealt with within the allotted time will be dealt with in a written reply

**Matters for Consideration**

109.	None Specific	<b>AFFORDABLE HOUSING STRATEGY 2024 - 2028</b>	<b>15 - 28</b>
110.	None Specific	<b>YOUNG PEOPLE'S HOUSING STRATEGY 2024-2028: TO PROVIDE SAFE, SECURE, AND AFFORDABLE ACCOMMODATION FOR OUR CARE LEAVERS, 16/17-YEAR-OLDS AT RISK OF HOMELESSNESS AND UNACCOMPANIED ASYLUM-SEEKING CHILDREN</b>	<b>29 - 68</b>
111.	None Specific	<b>BUILDING CONTROL PARTNERSHIP</b>	<b>69 - 196</b>
112.	None Specific	<b>STRATEGIC ASSET REVIEW</b>	<b>197 - 226</b>
113.	None Specific	<b>STATEMENT OF COMMUNITY INVOLVEMENT (ADOPTION)</b>	<b>227 - 344</b>
114.	None Specific	<b>RESPONSIBLE BODY STATUS (BIODIVERSITY NET GAIN)</b>	<b>345 - 352</b>

<b>115.</b>	Barkham	<b>BARKHAM SOLAR FARM UPDATE</b>	<b>353 - 368</b>
<b>116.</b>	None Specific	<b>SHAREHOLDERS COMMITTEE</b>	<b>369 - 382</b>

### **EXCLUSION OF THE PRESS AND PUBLIC**

The Executive may exclude the press and public in order to discuss the Part 2 sheets of Agenda Item 115 above and to do so it must pass a resolution in the following terms:

That under Section 100A (4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act (as amended).

A decision sheet will be available for inspection at the Council's offices (in Democratic Services and the General Office) and on the web site no later than two working days after the meeting.

### **CONTACT OFFICER**

<b>Priya Patel</b>	Head of Democratic and Electoral Services
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**MINUTES OF A MEETING OF  
THE EXECUTIVE  
HELD ON 22 FEBRUARY 2024 FROM 5.30 PM TO 6.05 PM**

**Committee Members Present**

Councillors: Stephen Conway (Chair), Prue Bray (Vice-Chair), Rachel Bishop-Firth, David Cornish, Lindsay Ferris, Paul Fishwick, David Hare, Ian Shenton and Imogen Shepherd-DuBey

**Other Councillors Present**

Rebecca Margetts

**95. APOLOGIES**

There were no apologies for absence submitted.

**96. MINUTES OF PREVIOUS MEETING**

The Minutes of the meeting of the Executive held on 24 January 2024 were confirmed as a correct record and signed by the Chair.

**97. DECLARATION OF INTERESTS**

There were no declarations of interest received.

**98. STATEMENT FROM THE LEADER**

This evening's Executive will be followed by the Council meeting at which we will be approving the budget for 2024/25. The budget papers presented to the Executive and then to Council are the culmination of many months of hard work, which started very soon after the last budget was set.

I want to take this opportunity to thank the Chief Finance Office, the Chief Executive, the directors, and all Council staff; my Executive colleagues; and the cross-party Community and Corporate Overview and Scrutiny Committee, which examined the budget in detail. Rarely, if ever, can there have been a more transparent budget process. I'm pleased to say that Chris Johnson, the Chair of the Community and Corporate Overview and Scrutiny Committee, has joined us this evening and he will be presenting his committee's report on that process before we consider the budget papers in this evening's agenda.

**99. PUBLIC QUESTION TIME**

In accordance with the agreed procedure the Chairman invited members of the public to submit questions to the appropriate Members.

**99.1 Peter Humphreys asked the Executive Member for Active Travel, Transport and Highways the following question:**

**Question:**

The Council is continually stating that it is in financial difficulties so one wonders why it is not capitalising on the current high price of scrap metal. Council officers and councillors can hardly fail to notice the amount of WBC owned scrap metal littering our streets. I'm referring in particular to the number of posts erected at residents' expense to which signs

have **never** been attached, likewise where signs have long since fallen off or become unreadable.

This is not just a current problem - it goes back many decades. Some of you with long memories may remember when David Lee was leader of the Council. At my prompting he had fifteen redundant posts removed from a short stretch of London Road. Things haven't changed and a new generation has appeared.

There is a particularly large cluster of abandoned posts in the vicinity of Dying Trees roundabout at the junction of the NWDR and Warren House Road. They've been there for circa five years. I've attached photographs below of the eyesores to refresh your memory. Are the Council planning to ask the public for suggestions of what to hang on the posts, are they going to sell them, or are they going to do nothing and let the posts rust gracefully?

**Answer:**

Thank you, Peter, for your question.

We are aware of several poles on our network which currently have no signs on them. Many, if not all the ones you have highlighted are related to development works undertaken by developers.

A change in road layout and speed limit will change the requirement for signs on the network, for example the North Wokingham Distribution Road junction with Binfield Road roundabout. The introduction of the roundabout has seen the speed limit amended. In these instances, the officer team are working with the developers to ensure such poles are removed.

Others which you have highlighted further along on the North Wokingham Distribution Road were installed with directional signs by the developer's contractor. The directional signs were not correct and so were removed.

The Borough Council is progressing a signage strategy and once complete, will see the installation of new signs utilising these poles wherever possible as this saves money and prevents abortive works and costs.

**Supplementary Question:**

It does take 5 years lead in to do those sort of things but fair enough. I would say that in most normal organisations there is a hierarchy structure that ensures that decisions are checked by more senior personnel to prevent cock ups such as these that I have mentioned, and there are many, many more that I have not mentioned. Why does this type of checking not exist at the Council, and if it does why do so many errors keep happening? Have any staff been disciplined or contractors, or fired as a result of these costly blunders?

**Supplementary Answer:**

Thank you, Peter. Most of these are changes required by the developers and staff are currently working with those developers to ensure that these poles are either removed or the signage is corrected on them where they exist. As I said, also we are doing a signage strategy, and that signage strategy will utilise the likes of the North Wokingham Distribution Road, with new signage through there, and that will extend beyond the North Wokingham



Distribution Road as well. Once that signage strategy is completed then there will be a new array of signs throughout Wokingham, which connects all of our new roads as well.

**99.2 Guy Grandison asked the Executive Member for Finance the following question:**

**Question:**

Upon review of this year's Treasury Management Strategy, I can find no reference to approval of the strategy by the Audit Committee, why is this?

**Answer:**

Thank you for your question.

The simple answer is that approving the Treasury Management Strategy is no longer part of the Audit Committee's terms of reference.

In February 2023, the Audit Committee reviewed its terms of reference in line with Chartered Institute of Public Finance (CIPFA) best practice as set out in their position statement on local authority audit committees. One of the changes recommended by CIPFA was that an audit committee should have no explicit decision-making role.

The Audit Committee therefore recommended to Council amendments to its terms of reference which included no longer approving the Treasury Management Strategy. This was agreed at full Council on 23 March 2023 to come into effect from the 2023/24 municipal year.

**Supplementary Question:**

I must admit that, that is exceedingly disappointing, simply because even if it is a recommendation from an outside body as it were, even if it is government, it means now, if I am remembering the Constitution correctly, that the only oversight of the Treasury Management Strategy is the SFO and the Executive Member. That means that democratic oversight is being removed. I am sorry I do not find that acceptable. My question now is what is being hidden away from everyone else?

**Supplementary Answer:**

It is not quite as simple as that. I agree that, to me, the people with the skills are on Audit, and are possibly the right people to contribute on this, but we are going with the CIPFA recommendations. The Treasury Management Strategy comes to Council, and is in fact coming to our meeting next. Any councillor who wants to comment on it, that would be an opportune moment to look at it and possibly vote against it if they did not like it. Hopefully, that answers your question.

**100. MEMBER QUESTION TIME**

In accordance with the agreed procedure the Chairman invited Members to submit questions to the appropriate Members.

**100.1 Rebecca Margetts asked the Executive Member for Environment, Sport and Leisure the following question:**

**Question:**

Over the last 2 years I have been supporting residents on Longwater Lane Finchampstead who have been experiencing localised flooding and breakdown of the surface on this right of way. Despite my efforts, we are no further forward and after any heavy spell of rain this

section of the lane floods again. It is currently in a very poor condition and barely passable in places.

Would the lead Member commit to meet with me, residents and officers to discuss a long term solution to try and resolve this issue.

**Answer**

Both the Executive Member for Active Travel, Highways and Transport and myself are aware that there have been some issues with localised flooding on the section of Longwater Lane that is a Public Right of Way and also that officers have a site meeting arranged with the Parish Council to discuss possible solutions. However, it is worth noting that the Council is only responsible for maintaining this section of Longwater Lane in a suitable condition for its public use as a footpath for pedestrians. Once officers have met with the Parish Council, we would be more than happy to meet with you discuss potential ways forward on this matter whilst balancing our service demands and priorities against the available investment.

**Supplementary Question:**

It is good to hear that you have spoken with the Parish Council. As the local Member for the area, and I know that David is a local Member for the area as well, and he is on the Parish Council, would I be able to attend that meeting as well, because I have been working closely with the residents and supporting them, and working with the officers, over the last two years, the drainage team, to try and get somewhere. Would I be able to attend that meeting too please?

**Supplementary Answer:**

I am not sure when it is, but I can certainly raise that tomorrow with the appropriate officers.

**101. HOUSING REVENUE ACCOUNT BUDGET 2024/25**

Prior to the consideration of the budget papers, Councillor Johnson presented the budget scrutiny report produced by the Community and Corporate Overview and Scrutiny Committee.

The Leader of the Council introduced the Housing Revenue Account 2024/25. He indicated that the Housing Revenue Account (HRA) was a ring fenced part of the budget, funded by rents paid by Council tenants. Money raised was spent on repairs and maintenance and helped to support the HRA borrowing to pursue schemes such as the Gorse Ride regeneration.

The previous year a rent increase below the government cap had been agreed. At the time it had been explained that in order to maintain the long-term viability of the HRA, this could not be repeated. As such tenants were being asked to pay up to the government cap. Tenant representatives on the Tenant and Landlord Improvement Panel had been consulted on and supported the need for the increase. Whilst the increase for two thirds of tenants would be covered by an increase in benefits, an extra sum had been set aside to help sustain tenancies should financial hardship arise, in the case of self funders.

**RESOLVED:** That the Executive endorses and recommends to Council for approval:

- 1) The Housing Revenue Account budget for 2024/25 (Appendix A);

- 2) Council house dwelling rents be increased by up to 7.7% effective from 1st April 2024 in line with the Council's Rent Setting Policy that was approved by Executive on 26th October 2023;
- 3) Garage rents to be increased by 8.33% effective from April 2024;
- 4) Shared Equity Rents to be increased by 7.7% effective from April 2024;
- 5) Tenant Service Charges to be increased over the next three year to achieve full cost recovery effective from April 2024;
- 6) The Housing Major Repairs (capital) programme for 2024/25 as set out in Appendix B;
- 7) Sheltered room guest charges for 2024/25 remain unchanged at £9.50 per night per room.

## **102. CAPITAL PROGRAMME AND STRATEGY 2024-2027**

The Executive Member for Finance introduced the Capital Programme and Strategy 2024-2027.

The document provided a high-level plan for the strategy and the spending of capital finances, approximately £520million for the next three years. The Executive Member highlighted the importance of continued investment in infrastructure and services.

The Executive Member for Finance emphasised that the Council had been able to control its capital financing and reduce external borrowing. There was an approximate £8.5million shortfall in the funding of the capital programme over the next three years, but it was anticipated that this would be balanced via reprofiling and income from developers. She commented that the capital financing levels were favourable against that forecasted in the 2021/22 strategy. The Executive Member went on to highlight some of the key projects.

**RESOLVED:** That the Executive endorses and recommends to Council for approval:

- 1) the Capital Strategy for 2024 - 2027 - Appendix A;
- 2) the three-year capital programme for 2024 - 2027 – Appendix B noting that approval was sought for 2024/25 schemes only;
- 3) the draft vision for capital investment over the next five years - Appendix C;
- 4) the use of developer contribution funding (s106 and CIL) for capital projects as set out in Appendix D. Approval was sought up to the project budget;
- 5) the Deputy Chief Executive (S151 Officer) will exercise, where possible the flexible use of capital receipts policy, as issued by the Secretary of State under section 15(1)(a) of the Local Government Act 2003;
- 6) approve delegation for the delivery (including awarding and signing of the contract) of the South Wokingham Distributor Road to the Deputy Chief Executive and Director of Place & Growth in agreement with Lead Member for Finance and Lead Member for Highways subject to the scheme being fully funded from Homes England Grant and Developer Contributions.

## **103. TREASURY MANAGEMENT STRATEGY 2024-2027**

The Executive Member for Finance reported that the Treasury Management Strategy set out the objectives and procedures and limits for managing the Council's finances.

**RESOLVED:** That the Executive endorses and recommends to Council for approval:

- 1) The Treasury Management Strategy as set out in Appendix A including the following additional appendices;

- Prudential Indicators (Appendix B)
- Annual Investment Strategy 2024/25 (Appendix C)
- Minimum Revenue Provision (MRP) policy (Appendix D)

#### **104. MEDIUM TERM FINANCIAL PLAN 2024-2027 INCLUDING REVENUE BUDGET SUBMISSION 2024/25**

The Executive Member for Finance introduced the Medium Term Financial Plan (MTFP) 2024-27, including Revenue Budget Submission 2024/25. It was noted that the relevant recommendations were contained within the supplementary agenda.

The MTFP outlined the proposed budget for 2024/25 and draft plans for the following two years. This covered both the revenue and capital budgets for the next three years. Members were advised that the net revenue budget for 2024/25 was currently set at £272million and that over £16million worth of savings were required to be made over the year, which would be a challenge.

**RESOLVED:** That

- 1) the Summary of Budget Movements (Appendix A) be recommended to Council;
- 2) the report of the Community and Corporate Overview and Scrutiny Committee relating to Scrutiny of the Budget Setting Process 2024-25 and the Medium Term Financial Plan 2024-2027 (as set out in Appendix B to the report), be noted;
- 3) the schedule of fees and charges, as set out in Appendix C to the report, to be effective from the dates listed on the schedule, and the schedule of fees and charges as set out in Appendix E in relation to the decision at Licensing and Appeals Committee, be approved.

#### **105. HOUSING RESPONSIVE REPAIRS & MAINTENANCE CONTRACT**

The Leader of the Council indicated that the report sought approval for a process for a competitive procurement exercise for the repairs and maintenance contract for properties owned by the Council in the HRA and by the Council's wholly-owned housing companies. The existing contract with Reading Borough Council was due to expire in a year's time. The procurement process would allow the exploration of other options but did not preclude a new contract with the existing contract holders. Tenants' satisfaction with the current service had been consistently high.

**RESOLVED:** That the recommendation to conduct a competitive procurement exercise to enable the Council to procure a service contract for Housing Responsive Repairs and Maintenance, the objective of which is to provide the best outcomes for the delivery of the service requirements and achieve best value for money for the Council and LHC's, be approved.

#### **106. ESTABLISHMENT OF A JOINT COMMITTEE - THE BERKSHIRE PROSPERITY BOARD**

The Leader of the Council reported that the Berkshire Leaders had agreed to establish a Berkshire Prosperity Board to enable the six Berkshire councils to continue to benefit from the expertise of the Local Enterprise Partnership (LEP) when pursuing particular strategic objectives.

The Berkshire Prosperity Board would enable the six Berkshire unitaries to have a stronger voice and to bid with a greater chance of success for significant external funding for key projects that affected all or much of the county. The Leader of the Council drew the Executive's attention to the likely rewards versus the small cost of servicing the board, which would be met largely from the reallocation of the government funding for the LEP to the councils. He highlighted that the Prosperity Board would make decisions on the basis of unanimity, and that the decision-making powers, and sovereign authority, of each of the six unitaries would remain unaffected.

**RESOLVED:** That the Executive recommends to Council for approval:

- 1) the establishment of a fully constituted Joint Committee (to be known as the Berkshire Prosperity Board) from May 2024 to deliver a Berkshire-wide vision for inclusive green and sustainable economic prosperity.
- 2) that the proposed constitution for the Joint Committee as set out in Appendix A - Functions and Procedure Rules for a Joint Committee, Appendix B - Responsibilities of the accountable body and Appendix C - Governance structure be approved subject to review by each member Council within 6 months.
- 3) that the Chief Executive be delegated to reach a legally binding Agreement between the member Authorities setting out the supporting arrangements and responsibilities between the Authorities, particularly that between the Lead Authority, known as the Accountable Body and the other member Authorities and go through the relevant democratic process if required. Such Agreement also to be approved by the s151 Officer.

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<b>TITLE</b>	<b>Affordable Housing Strategy</b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	(All Wards);
<b>LEAD OFFICER</b>	Director, Place and Growth - Giorgio Framalocco
<b>LEAD MEMBER</b>	Leader of the Council and Executive Member for Housing - Stephen Conway

## **PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

To obtain the Executive's approval to progress this strategy to Full Council for consideration of the adoption of Wokingham Borough Council's Affordable Housing Strategy 2024-2028. As per Chapter 4.1.1 of the Constitution, the Council's Housing Strategy must be considered at Full Council.

The Affordable Housing strategy outlines four strategic priorities and will be accompanied by a more detailed action plan which will be refreshed on an annual basis. The strategy sets out the Council's strategic direction to build the right homes in the right places and support our residents by developing socially inclusive communities. The strategy is underlined by a strong commitment to partnership working with the aim of increasing the quality and quantity of affordable housing in the Borough by:

1. Addressing and understanding our housing needs
2. Providing suitable accommodation options to our most vulnerable residents
3. Ensuring homes are healthy, safe, efficient, environmentally sustainable and well-designed
4. Creating positive social impact to promote inclusive growth and develop thriving communities

This will improve housing outcomes for our residents, as well as helping to mitigate the increasing financial pressure created by the Council's duty to provide accommodation, by providing additional housing options with varying levels of support to ensure sufficiency of provision for a number of different priority groups. This will futureproof the Council's resilience to respond to the increasing level of housing demand by building a healthy pipeline of good quality, affordable housing delivery whilst continuing to implement early intervention and commissioning appropriate support where possible to tackle the causes of homelessness and rough sleeping at source. In turn, the Council anticipates improved outcomes for our residents, and the wider community, through the implementation of this strategy.

At January's Overview and Scrutiny Management Committee Members were asked for input into the proposed changes for key workers within the Council's Allocations Policy removing the requirement for key workers to have lived within the Borough for the previous 5 years, but retaining the need for those key workers to be in employment within the Borough. This was supported by the Committee and is therefore put forward to Executive for approval.

Executive are also asked to agree going out to consultation to look at moving care leavers (currently placed in band 2 of the Council's allocation policy) into band 1, the highest priority banding. If the outcome of the consultation suggests this is feasible then in line with external legal advice, further approval from Executive will be sought.

## **RECOMMENDATION**

That the Executive approves;

- (1) Support of the Affordable Housing Strategy 2024-2028 and recommendation to Full Council for approval and implementation;
- (2) Removal of the requirement for key workers to have lived within the Borough for the previous 5 years within the Council's allocations policy;
- (3) To consult on proposals to place care leavers into band 1 of the Council's allocation policy.

## **EXECUTIVE SUMMARY**

The Council's aim is to create a future pipeline of affordable and sustainable homes for those most in need. This will help to reduce social and economic inequalities across the Borough by creating stable and safe homes. Working with our partners and engaging with our residents and landlords across the Borough, we will help to ensure that we address and understand our housing need and help maximise affordable housing delivery where possible. We will build the right homes in the right places, improve the quality, sustainability and design of the housing stock and support our residents by developing socially inclusive and healthy communities.

The four strategic priorities that this strategy will look to deliver over the strategy period 2024 to 2028 are:

**Strategic Priority 1** – Continue to address and understand our housing needs

**Strategic Priority 2** – Provide suitable accommodation options to our most vulnerable residents

**Strategic Priority 3** – Ensure that homes are healthy, safe, efficient, environmentally sustainable and well designed

**Strategic Priority 4** – Create positive social impact which will help promote inclusive growth and develop thriving communities

Since the previous Housing Strategy was published in 2020, there has been increasing demand on the Council's housing stock and services with demand outstripping supply. This is despite Wokingham delivering some of the highest levels of affordable housing nationally. Many of our residents require specialised dwellings and bespoke support to fulfil their tenancies and this requires additional spend to meet their individual needs. An increase in the number of residents that require our support increases the financial outlay for the Council to provide these services which then places the Council under unsustainable financial pressure. This strategy outlines how we can mitigate the increase in demand for social and supported housing to reduce the cost to the Council whilst also working with our partners to maximise outcomes for our existing residents.



At January's Overview and Scrutiny Management Committee Members were asked for input into the proposed changes for key workers within the Council's Allocations Policy removing the requirement for key workers to have lived within the Borough for the previous 5 years, but retaining the need for those key workers to be in employment within the Borough. This was supported by the Committee and is therefore put forward to Executive for approval.

Executive are also asked to agree going out to consultation to look at moving care leavers (currently placed in band 2 of the Council's allocation policy) into band 1, the highest priority banding. If the outcome of the consultation suggests this is feasible then in line with external legal advice, further approval from Executive will be sought.

Following approval at Executive, the strategy will go to Full Council in March 2024 where it is expected to be published shortly after.

## BACKGROUND

The Council's previous Housing Strategy ran from 2020 and will conclude in 2024. This strategy has led to the implementation and delivery of several key initiatives. Whilst we prioritise housing for those who need it most, there is an increasing need to alleviate pressures on the Council's limited stock and resources. Affordable housing is an area of intense pressure for the Council and so adding 'affordable' to the title of this strategy, it becomes an affordable housing strategy rather than a standard housing strategy. This makes it clear what type of housing we are looking to promote outcomes for and who we need to work with to achieve this.

In the past 4 years, over the course of the previous Housing Strategy, the Council has:

- Delivered one of the highest numbers of affordable housing in England, completing 542 affordable homes in the past 3 years and generating a future pipeline of over 1600 additional homes
- Implemented a new allocations policy to help allocate affordable homes to those most in need
- Gorse Ride estate regeneration phase 1 completed (46 homes), with phase 2 underway
- Delivered an award-winning programme of six specialist housing schemes for 34 adult social care users, providing long term quality homes for those with learning disabilities, physical disabilities, complex needs or requiring mental health support
- Delivered a new Semi-independent Living (SIL) accommodation scheme for care leavers in Wokingham, providing accommodation for up to 7 care leavers
- Awarded Govt. grant funding through the Single Homelessness Accommodation Programme to deliver Housing First intensive support for 7 young people
- Awarded £3.1m grant funding towards the purchase of 17 homes for use by Ukrainian and Afghan refugees
- Provided an 18 unit affordable rented scheme for key workers in Wokingham through one of our Registered Provider partners
- Reduced the number of care leavers in temporary accommodation to 6 residents over last 2 years
- Submitted a successful bid has under the Social Housing Decarbonisation Fund to bring c110 homes to an EPC C by 2025.

The outcomes to be achieved from the new strategy are:

- Delivery of more affordable homes in the Borough
- Increased capacity within the private rental sector
- More opportunities for supporting the local economy and key sectors such as social care
- Enable people to stay in their homes for longer
- Delivering housing and support tailored to meet identified need
- Improving guidance and information
- Developing effective policies and strategies to ensure housing delivered meets need
- Improving the quality and management of affordable homes

- Ensuring quality and sustainability of design of all affordable homes
- Regenerating communities and housing stock
- Developing more socially inclusive communities through housing initiatives to support local residents Increase support for Early Intervention to prevent homelessness at the earliest opportunity
- Undertake a cross-annual service snapshot to identify young people aged 14+ who are at risk of homelessness
- Commitment to ensure young people do not need to present as homelessness in order to be accommodated

The Affordable Housing Strategy is the framework strategy document which defines the strategic vision of affordable housing for the Council. It provides an “umbrella” and oversees the supporting strategies of the Homelessness and Rough Sleeping Strategy, Young People’s Housing Strategy, a proposed new Older People’s Housing Strategy and Affordable Housing Options Strategy. Please see Enclosure 3 for more detail. The Council has significant pressure on our residents’ housing placements, especially those who require additional support needs. This strategy outlines how the Council will seek to provide for the Borough’s residents in a cost-effective and sustainable way, with community and social value a golden thread embedded within our way of working.

## **BUSINESS CASE**

The current cost of living crisis is leading to soaring energy bills, interest rates and private sector rents have created a causal effect on the number of people presenting as homeless to the Council. The Affordable Housing Strategy seeks to identify and mitigate the challenges and risks outlined herein:

- Affordable housing delivery is dependent on developers bringing their sites forward which in turn is partly affected by the wider economic climate - rising build costs, shortages of skilled workers and a downturn in house prices can see delays in the delivery of schemes or a lack of planning applications coming forward which then results in the demand for affordable housing outstripping supply.
- Finite resources (such as land availability, financial resources) means that the Council cannot meet all need and faces a difficult task of prioritising competing requirements. For example, there are increasing demands from those facing homelessness, adult social care users or children’s services requiring more specialist accommodation.
- The reduced supply of affordable homes due to Right to Buy which reduces the amount of affordable housing stock in the Borough. Nationally around 40% of homes purchased under Right to Buy have later been sold into the private rental sector. This leads to more residents relying on housing benefit due to a lack of social rented homes.
- There is a small and expensive private rental sector in the Borough. With an increasing number of people on low incomes and a shortage of affordable housing this is pushing people to live in an unsuitable accommodation or to seek accommodation further afield.
- Climate change is already affecting houses within the Borough. More extreme weather events such as heatwaves and flooding, as well as rising temperatures risk making homes unliveable, threatening the health and wellbeing of our tenants. Homes need to be designed with climate change in mind, to ensure our residents are

protected, and minimise future spent to retrofit homes, or repair them after climate change impacts.

- At the same time, there is a challenge within the Borough to manage and balance housing need whilst ensuring homes are fit for future climate challenges, and the Council is able to reach carbon neutrality by 2030.
- Wokingham Borough has an increasing proportion of residents with long term health conditions, such as dementia, and people with learning disabilities or difficulties, it is important that we address and manage demand for long term care and maintain high quality services, especially where delivery of specialist accommodation can help alleviate financial pressures or deliver more effective care and support.
- There are pockets of deprivation, unemployment, and a risk of poverty within working families. With the cost-of-living crisis we are seeing more people presenting as homeless

The draft Affordable Housing Strategy has four key priorities, outlined below:

### **Strategic Priority 1** – Continue to address and understand our housing needs

The population and make up of our Borough is changing. The cost-of-living crisis is putting additional pressures on our residents. We have a small and expensive private rental sector in the Borough. There are increasing numbers of residents presenting as homeless. More affordable housing will be needed to meet demand and address the outcome of these pressures. We need a diverse mix of homes to meet the changing needs of our Borough, especially around a growing older population with homes for key workers required to support the ageing population. Furthermore, the future Adult Social Care reforms will lead to increased demand for older residents to remain in their own homes, if they so wish, with appropriate care and support.

### **Strategic Priority 2** – Provide suitable accommodation options to our most vulnerable residents

We want to support more people to live independently and stay healthy by offering the right housing options to meet their needs. With the cost-of-living crisis and increased complex health needs we need to offer more support and options to those who are homeless, currently sleeping rough, at risk of homelessness or are survivors of domestic abuse. Our priority groups for young people aged 16-25, are those in and transitioning out of care, 16/17-year-olds at risk of homelessness and Unaccompanied Asylum-Seeking Children (UASC) leaving care. We also have a large pipeline of need from those residents with learning disabilities, physical disabilities or are struggling with their mental health who require more support through specialist housing schemes.

### **Strategic Priority 3** – Ensure that homes are healthy, safe, efficient, environmentally sustainable and well designed

Poor housing can have a severe impact on health and wellbeing, resulting in stress and anxiety caused by living in insecure, unaffordable, or damp and mouldy homes. Overcrowded homes do not have space to study or play. Lack of stable housing can mean frequent school moves, with no chance to learn or make friends. Climate change

is already affecting our Borough (coupled with cost-of-living crisis), with impacts on the quality of life on our community and the most vulnerable residents. From April 2024, under the forthcoming Social Housing Regulation Act, housing associations and stock-holding local authorities will be required to demonstrate their adherence to consumer standards. The Council has committed to carbon neutrality by 2030. Thus, it becomes imperative, for the Council to deliver a good choice of high quality, climate-ready and well managed housing that will play an integral role in supporting residents with adapting to the evolving effects of climate change. This type of housing will have better energy efficiency standards, improved thermal comfort, reduced environmental impact, and contribute to Borough’s commitment to be carbon neutral by 2030.

**Strategic Priority 4 – Create positive social impact which will help promote inclusive growth and develop thriving communities**

The Council, together with its partners such as Registered Providers, the Tenant and Landlord Improvement Panel, organisations such as the NHS and third sector organisations, has a key role through engagement in helping to create thriving communities and address the root causes of housing crises such as improving employability, enhancing tenancy sustainability, reducing worklessness and a reliance on benefits. By investing in social capital programmes and delivering initiatives such as creative social prescribing and tenancy sustainment schemes, and arts based approached to improving health and wellbeing will help to empower residents and transform lives, as well as more broadly helping to support the local economy and wider community.

**Next Steps**

The strategy was released for public consultation on the 18<sup>th</sup> January 2024 which concludes on the 18<sup>th</sup> February that being before it is considered at this Executive meeting, prior to consideration at Full Council in March 2024 and before publication shortly after. The strategy will run for 4 years up to 2028 and progress against the strategic priorities will be assessed throughout including annual reviews of the action plan.

**FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	nil	Yes.	
Next Financial Year (Year 2)	nil	Yes.	
Following Financial Year (Year 3)	nil	Yes.	

<b>Other Financial Information</b>
<p>One of the key outcomes the strategy seeks to address is cost avoidance and exploring opportunities to invest to save and applying for government grant. There are a number of housing schemes which are included in the Council's Medium Term Financial Plan for 2024/25, such as the Gorse Ride regeneration scheme and proposed affordable housing schemes on Council owned land where affordable housing delivery will be maximised. An action plan which will accompany the strategy will assist the monitoring against financial outcomes.</p> <p>Any future capital and revenue approvals needed to enact this strategy will be sought and contained within the Council's annual budget setting process whilst external grant funding opportunities will be sourced and pursued in order to maximise the outputs of this strategy.</p>

<b>Legal Implications arising from the Recommendation(s)</b>
<p>This report and decision making process arising from the same has been considered by the Legal Officer within the context of the Constitution and public law.</p>

<b>Stakeholder Considerations and Consultation</b>
<p>Public consultation released on the 18<sup>th</sup> January 2024 and concluded on the 18<sup>th</sup> February 2024.</p>

<b>Public Sector Equality Duty</b>
<p>A Stage 1 Equalities and Impacts Assessment has been undertaken and found only positive or neutral impacts on each demographic, so a Stage 2 assessment is not required.</p>

<b>Climate Emergency – <i>This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030</i></b>
<p>The Affordable Housing Strategy aligns with this goal, aiming to provide sustainable and affordable homes which meet these climate targets. Recognising the link between housing quality and well-being, the strategy emphasizes the importance of climate-ready, energy-efficient homes through the inclusion of specific KPIs in this area. Meeting these will support residents in adapting to climate change and contribute to the council's carbon-neutral commitment by 2030.</p>

<b>Reasons for considering the report in Closed Session</b>
N/A

<b>List of Background Papers</b>
<p>Enclosure 1 - Affordable Housing Strategy Draft  Enclosure 2 - Affordable Housing Strategy – Stage 1 EQIA  Enclosure 3 – Housing Strategy Documents and Policies Chart</p>

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## “Right Homes, Right Places”

**Housing plays a huge role in the health, environmental, social and economic well-being of everyone who lives in the Borough. It is more than just bricks and mortar; everyone is affected by housing. Housing underpins local growth and economic stability as well as contributing to healthy, thriving communities.**

With the effect of global economic shocks including soaring energy prices, rising interest rates and increasing inflation, have in turn created a cost-of-living crisis. This and coupled with the fact that Wokingham remains a Borough of high unaffordability means there is a real requirement to address housing need, especially as there is an increasing trend of more households presenting as homeless and younger people having to make stark life choices due to the high cost of housing. The Council’s aim is to create a future pipeline of affordable and sustainable homes for those most in need. This will help to reduce social and economic inequalities across the Borough by creating stable and safe homes. Working with our partners and engaging with our residents and landlords across the Borough, we will help to ensure that we address and understand our housing need and help maximise affordable housing delivery where possible. We will build the right homes in the right places, improve the quality, sustainability and design of the housing stock and support our residents by developing socially inclusive and healthy communities.

*\*By affordable housing we mean housing for those residents whose housing needs are assessed as not being met by the general market. Products include discounted rents and affordable home ownership products.*

### The Council’s role includes:

- Working with developers and partners to deliver good quality environmentally and financially sustainable homes in the right places, maximising affordable housing where possible especially social rented homes
- Working with partners including, but not limited to, our housing companies, town and parish councils, RPs, neighbouring authorities, integrated care boards and the NHS
- Investing in our own housing stock, acting as corporate landlord to ensure we provide a decent standard of homes and respond to new regulations on health and safety
- To manage and respond to our housing needs
- Delivering ambitious estate regeneration programmes to develop well connected and socially inclusive communities
- Working with landlords to improve standards of private rental sector properties
- Working across different departments, agencies, and other Berkshire authorities to ensure effective infrastructure delivery to mitigate against development and support new and existing communities
- Prioritising people with additional support needs to access appropriate accommodation and support
- Acting as the corporate parent and providing accommodation for young people leaving care

### Key facts and figures

- In Wokingham, the population size has increased by 15.0%, from around 154,400 in 2011 to **177,500** in 2021. This is higher than the overall increase for England (6.6%) where the population grew by nearly 3.5 million to 56,489,800 (and Southeast (7.5%). As of 2021, Wokingham is the 28th most densely populated of the South East's 64 local authority areas (Census 2021).
- Between 2011 to 2021, it is estimated that Wokingham saw a **11.1%** increase in the population aged between 15-64 and a **28.2%** increase in the population aged 65+. (Census 2021). The population is expected to grow by **8.9%** (14,867) by 2028 from 2018 (ONS 2020).
- The average price of a home in the Borough is **£511,505** compared to a national average of **£292,882** (UK House Price Index, Aug 2023)
- Those on the Council’s Housing Register identified as being in priority housing need (Band 1-3) stands at **606** households (September 2023)
- The Council has over **2500** affordable homes within its stock, with Registered Providers owning over **4500** affordable homes in the Borough

Our housing priorities – what we will do	
Priority	Why is this important?
<b>Continue to address and understand our housing needs</b>	The population and make up of our Borough is changing with the biggest financial pressures coming from an ageing population over 65+ who require more adaptive accommodation to meet their changing requirements. As a local authority we will need to work more closely with external partners such as the NHS and third sector agencies to help address these changing needs. More generally, the cost-of-living crisis is putting additional pressures on our residents. We have a small and expensive private rental sector in the Borough. There are increasing numbers of residents presenting as homeless. More affordable housing will be needed to meet demand and address the outcome of these pressures. We need a diverse mix of homes to meet the changing needs of our Borough, especially around a growing older population with homes for key workers required to support the ageing population. Furthermore, the future Adult social care reforms will lead to increased demand for older residents to remain in their own homes, if they so wish, with appropriate care and support.
<b>Provide suitable accommodation options to our most vulnerable residents</b>	We want to support more people to live independently and stay healthy by offering the right housing options to meet their needs. With the cost-of-living crisis and increased complex health needs we need to offer more support and options to those who are homeless, currently sleeping rough, at risk of homelessness or are survivors of domestic abuse. Our priority groups for young people aged 16-25, are those in and transitioning out of care, 16/17-year-olds at risk of homelessness and Unaccompanied Asylum-Seeking Children (UASC) leaving care. We also have a large pipeline of need from those residents with learning disabilities, physical disabilities or are struggling with their mental health who require more support through specialist housing schemes.
<b>Ensure that homes are healthy, safe, efficient, environmentally sustainable and well designed</b>	Poor housing can have a severe impact on our health and wellbeing. Overcrowded homes don’t have space to study or play. Lack of stable housing can mean frequent school moves, with no chance to learn or make friends. In less obvious ways, poor housing can result in mental ill health, stress and anxiety caused by living in insecure, unaffordable or damp and mouldy homes. From April 2024, under the forthcoming Social Housing Regulation Act, housing associations and stock-holding local authorities will be required to demonstrate their adherence to consumer standards. A good choice of high quality, sustainable and well managed housing will help the Borough to achieve energy efficiency and reduce the environmental impact of housing, contributing to Borough’s commitment to be carbon neutral by 2030. This also includes providing more environmentally sustainable measures to existing stock.
<b>Create positive social impact which will help promote inclusive growth and develop thriving communities</b>	Building communities, not just homes, is essential for the future of the Borough. The Council, together with its partners such as Registered Providers, the Tenant and Landlord Improvement Panel and third sector organisations, has a key role through engagement in helping to create thriving communities and address the root causes of housing crises such as improving employability, enhancing tenancy sustainability, reducing worklessness and a reliance on benefits. By building healthy communities, using Marmot principles*, we can help address social and health inequalities across the Borough. By investing in

social capital programmes and delivering initiatives such as creative social prescribing and tenancy sustainment schemes, and arts based approaches to improving health and wellbeing will help to empower residents and transform lives, as well as more broadly helping to support the local economy and wider community.

*\*Eight policy areas have been designed by Professor Sir Michael Marmot to support healthy and sustainable communities, these include early years development, employment, living standards, communities, ill-health prevention, discrimination, and environmental sustainability.*

Our successes since the last Housing Strategy	Our challenges going forward
<ul style="list-style-type: none"> <li>As a Local Authority we delivered one of the highest numbers of affordable homes in England, completing 542 affordable homes in the past 3 years and generating a future delivery pipeline of over 1600 additional affordable homes</li> <li>Implemented a new allocations policy to help allocate affordable homes to those most in need. Compared to other Berkshire and Greater London authorities the number of people on our Housing Register remains static but low</li> <li>Gorse Ride estate regeneration phase 1 completed (46 homes), with plans for phase 2 underway. The estate has been designed to be gas free</li> <li>Delivered an award-winning programme of six specialist housing schemes for 34 adult social care users, providing long term quality homes for those with learning disabilities, physical disabilities, complex needs or requiring mental health support</li> <li>Delivered a new Semi-independent Living (SIL) accommodation scheme for care leavers in Wokingham, providing accommodation for up to 7 care leavers</li> <li>Awarded Govt. grant funding to deliver four properties for those sleeping rough in the Borough and who require intensive support using a Housing First model. Secured further funding through the Single Homelessness Accommodation Programme.</li> <li>Awarded £3.1m grant funding towards the purchase of 17 homes for use by Ukrainian and Afghan refugees</li> <li>Provided an 18 unit affordable rented scheme for key workers in Wokingham through one of our Registered Provider partners</li> <li>Increased our provision of temporary accommodation by securing long term leases with private landlords and delivering a 23 unit modular build scheme in Winnersh</li> <li>Focussed on practical responses, preventative initiatives, enhancing housing pathways to help end rough sleeping</li> <li>Reduced the number of care leavers in temporary accommodation from 9 to 2 residents</li> <li>Helped people access and secure private rented housing, through schemes such as the Rent in Advance/ Deposit Loan Scheme</li> <li>Met and maintained the Decent Homes Standard target on our own housing stock, with the majority of stock meeting an EPC C rating</li> <li>Submitted a successful bid has under the Social Housing Decarbonisation Fund to bring c110 homes to an EPC C by 2025.</li> <li>Over 1600 households in the Borough received assistance from Help to Heat (a Govt. energy grant).</li> </ul>	<ul style="list-style-type: none"> <li>Affordable housing delivery is dependent on developers bringing their sites coming forward which in turn is partly affected by the wider economic climate - rising build costs, shortages of skilled workers and a downturn in house prices can see delays in the delivery of schemes or a lack of planning applications coming forward which then results in the demand for affordable housing outstripping supply</li> <li>Finite resources (such as land availability, financial resources) means that the Council cannot meet all need and faces a difficult task of prioritising competing requirements. For example, there are increasing demands from those facing homelessness, adult social care users or children's services requiring more specialist accommodation</li> <li>The reduced supply of affordable homes due to Right to Buy which reduces the amount of affordable housing stock in the Borough. Nationally around 40% of homes purchased under Right to Buy have later been sold into the private rental sector. This leads to more residents relying on housing benefit due to a lack of social rented homes</li> <li>There is a small and expensive private rental sector in the Borough. With an increasing number of people on low incomes and a shortage of affordable housing this is pushing people to live in an unsuitable accommodation or to seek accommodation further afield</li> <li>There is a challenge within the Borough to manage and balance housing need whilst protecting the quality of our environment especially in order to achieve carbon neutrality by 2030</li> <li>Wokingham Borough has an increasing proportion of residents with long term health conditions, such as dementia, and people with learning disabilities or difficulties, it is important that we address and manage demand for long term care and maintain high quality services, especially where delivery of specialist accommodation can help alleviate financial pressures or deliver more effective care and support</li> <li>There are pockets of deprivation, unemployment, and a risk of poverty within working families. With the cost of living crisis we are seeing more people presenting as homeless</li> </ul>

What do our residents say? (To note STAR survey outcomes for 2023 will be included in this section – this is a survey of the Council's housing tenants)

- In the New Homes Survey 2023 (survey to all new homes in the Borough):**
- 82% of respondents were either satisfied or very satisfied with their new home
  - 100% of shared owners were satisfied with their new home
  - 70% agree that their house and area are attractive
  - 77% felt a sense of community

What we are going to do - how we will address our priorities		
Priority	Outcomes	What are we going to do?
Continue to address and understand our housing needs	Delivery of more affordable homes in the Borough	<ul style="list-style-type: none"> <li>Work towards maximising affordable housing delivery through the Local Plan Update, subject to development viability</li> <li>Over 600 affordable homes to be delivered through the Council's partnership with Registered Providers during the Housing Strategy period (subject to development sites coming forward)</li> <li>The Council to consider 100% affordable sites up to a threshold of 50 homes per site and subject to the requirement for supporting infrastructure requirements</li> <li>The Council to support affordable housing delivery through its own housing companies</li> <li>The Council to explore opportunities to repurpose underutilised or vacant assets and to maximise affordable housing delivery on its own land assets, subject to viability and prioritisation of service need</li> <li>Create an Affordable Housing Delivery Options Strategy to look at options for future delivery including maximising external funding and regeneration opportunities</li> <li>Address the housing needs of our refugee communities, Gypsy Roma Traveller and Boat Dweller communities</li> </ul>
	Increased capacity within the private rental sector	<ul style="list-style-type: none"> <li>Work with private landlords to expand the private rented sector to increase the range of available housing options</li> <li>Aim to enhance access to more affordable rental accommodation by exploring the possibility of local rent control measures or incentivising landlords to offer lower than market rents</li> <li>Explore how the Council's housing companies could provide accommodation through a private rental sector approach</li> </ul>
	More opportunities for supporting the local	<ul style="list-style-type: none"> <li>Work with our partners to provide more key worker accommodation and explore the possibility of short-term tenancies for transitional key workers on short term contracts where this supports sectors such as social care or creative industries</li> </ul>

	economy and key sectors such as social care	
	Enable people to stay in their homes for longer or providing suitable accommodation options for the ageing population	<ul style="list-style-type: none"> <li>Understand the requirement for those older residents who want to stay in their own homes with appropriate care and support</li> <li>Working with external partners such as NHS and third sector agencies to help address changing needs</li> <li>Work with colleagues in Adult Social Care to help prepare for the adult social care reforms and any potential impact on housing requirements</li> <li>Ensure we have the appropriate funding in place to support those who want to stay in their homes for longer (e.g., Disabled Facilities Grant funding)</li> <li>Ensure all new homes are accessible as per the accessibility standards</li> </ul>
<b>Provide suitable accommodation options to our most vulnerable residents</b>	Delivering housing and support tailored to meet identified need	<ul style="list-style-type: none"> <li>Developing more supported housing for vulnerable people based on need including rough sleepers, those requiring temporary accommodation, survivors of domestic abuse, adult social care clients, children in care and care leavers and those requiring more support</li> <li>Inclusion of specialist accommodation as part of affordable housing provision within new development schemes where appropriate, especially where schemes are close to local facilities or public transport</li> <li>Work with the Council's Registered Provider partners to deliver more specialist and supported accommodation</li> <li>Continue to provide a range of care and support services to help vulnerable people live independently</li> <li>Explore the feasibility of providing more targeted support for those in housing need through schemes such as a mother &amp; baby unit or other family focussed schemes which support single fathers</li> </ul>
	Improving guidance and information	<ul style="list-style-type: none"> <li>Continue to improve access to information, advice and guidance on housing, distributing information through a variety of partners including our town and parish councils, Citizens Advice Wokingham, voluntary and charity sector partners</li> <li>Enhance the digital advice and guidance available to residents via the Council's website and social media</li> </ul>
	Developing effective policies and strategies to ensure housing delivered meets need	<ul style="list-style-type: none"> <li>Implementation of a new Young Persons Housing Strategy and an updated Homelessness and Rough Sleeping Strategy in 2024/25</li> <li>Development and implementation of a new Older Persons and Specialist Accommodation Housing Strategy</li> <li>Develop a Specialist Housing Supplementary Planning Document ensuring best practice in the design and delivery of specialist housing for our most vulnerable residents</li> </ul>
<b>Ensure that homes are healthy, safe, efficient and well designed</b>	Improving the quality and management of affordable homes	<ul style="list-style-type: none"> <li>Improve the quality and on-going management of homes and environments containing affordable housing</li> <li>Make best use of existing homes and assets to help tackle housing need as well as over-crowding and under-occupation</li> <li>Ensure all landlords in the Borough engage with and listen to their tenants and deliver the best possible housing management service</li> <li>Ensure that the Council continues to engage with and involve its tenants through the Tenant and Landlord Improvement Panel and ensure the core values of their Tenants Charter are reflected across all affordable housing</li> <li>Support our Private Rented Sector (PRS) residents and work with PRS landlords to improve standards of properties and expand the capacity of the PRS to increase the housing options available to the Borough's residents</li> <li>Improve the temporary and emergency accommodation offer for rough sleepers and homeless residents</li> <li>Ensure that fire safety, health and safety remain the top priority in every home and housing scheme</li> </ul>
	Ensuring quality and sustainability of design of all affordable homes	<ul style="list-style-type: none"> <li>The adoption of a new Local Plan, updated Affordable Housing Supplementary Planning Document and Borough Design Guide</li> <li>Improve energy efficiency, reduce carbon emissions and fuel poverty, working towards achieving a carbon neutral Borough by 2030.</li> <li>Make the best use of Council-owned land setting the standard for high quality sustainable new housing and ensure that new Council owned homes aspire to be carbon neutral</li> <li>Improve energy performance of Council housing stock to EPC C and above by 2030, delivering schemes to support retrofitting of existing older stock to ensure we meet our climate emergency aims</li> <li>Engage with the Council's partner Registered Providers to support retrofitting of older homes in the Borough</li> <li>Ensure new developments make adequate provision for sustainable transport, electric vehicle charging points, superfast broadband and work from home facilities</li> </ul>
	Regenerating communities and housing stock	<ul style="list-style-type: none"> <li>Continue to deliver regeneration programmes of older, poor quality housing stock such as at Gorse Ride in Finchampstead</li> <li>Ensure any regeneration projects are led by the local community and address their needs and priorities</li> <li>Ensure any regeneration projects help to build resilient communities and housing stock for future climate impacts</li> </ul>
<b>Create positive social impact which will help to underpin local growth and develop inclusive and thriving communities</b>	Developing more socially inclusive communities through housing initiatives to support local residents	<ul style="list-style-type: none"> <li>Promote independence, health and wellbeing to all residents</li> <li>Work to improve life chances for all tenants including a stable home and employment opportunities</li> <li>Create communities and homes, not housing and estates, ensuring that the impact on existing communities from new development is minimised during the development period and is positive in the longer term, utilising arts based approaches to community cohesion and placemaking</li> <li>Continue to expand employment and training opportunities for all residents including exploring and implementing opportunities for vulnerable residents</li> <li>Improve day to day housing affordability through preventative projects to tackle challenges such as fuel poverty</li> <li>Work together with partner Registered Providers on specific activities which contribute to social and community inclusion and support tenancy sustainability such as creative social prescribing</li> </ul>

**How will we measure success?** We will use the following example indicators to measure our progress against the high level outcomes:

<p><b>Continue to address and understand our housing needs</b></p> <ul style="list-style-type: none"> <li>Number of affordable homes delivered especially social rented homes</li> <li>Number of affordable homes negotiated</li> </ul>	<p><b>Provide suitable accommodation options to our most vulnerable residents</b></p> <ul style="list-style-type: none"> <li>No care leavers in temporary accommodation</li> </ul>	<p><b>Ensure that homes are healthy, safe, efficient and well designed</b></p> <ul style="list-style-type: none"> <li>% of affordable housing stock which meets the Decent Homes Standard</li> <li>Ensure all new homes are carbon-neutral</li> </ul>	<p><b>Create positive social impact which will help to underpin local growth and develop inclusive and thriving communities</b></p> <ul style="list-style-type: none"> <li>Number of residents supported through initiatives such as creative</li> </ul>
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<ul style="list-style-type: none"> <li>• Delivery of additional GRT pitches and boat dweller moorings</li> </ul>	<ul style="list-style-type: none"> <li>• Ending all rough sleeping by 2025 (to note this is a national government policy approach)</li> <li>• Numbers of people accessing information, advice and guidance</li> <li>• Number of care leavers and Learning Disabled residents in suitable accommodation</li> <li>• % of those presenting as homeless, homeless acceptances and use of B&amp;B</li> <li>• Delivery of supported housing projects</li> </ul>	<ul style="list-style-type: none"> <li>• Adoption of a new Local Plan and sustainability policies</li> <li>• Implementation of an updated Affordable Housing SPD and Borough Design Guide</li> <li>• Annual publication of Climate Emergency Action Plan progress report (CEAP)</li> <li>• Number of council-owned properties with EPC rating C and above</li> <li>• % of Homes with EPC C rating or above by 2030</li> <li>• Number of social housing properties achieving high efficiency standards</li> <li>• RPs to complete a stock survey of all existing Wokingham properties</li> <li>• RPs to measure and report back on the SAP and EPC rating of all new developments in Wokingham</li> </ul>	<p>social prescribing or arts based community cohesion initiatives</p> <ul style="list-style-type: none"> <li>• Number of households lifted out of fuel poverty</li> <li>• Number of residents participating in business enterprise/skills development courses</li> <li>• % satisfaction levels in the annual New Homes survey</li> <li>• Ongoing engagement/consultation with key groups e.g. young people to understand their needs and requirements</li> <li>• Using tailored arts based approaches to increase participation in community initiatives</li> </ul>
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An accompanying action plan has been developed which will be updated annually and will set out how the Council will deliver against the priorities set out above. Progress will be monitored by the Council, HAIG (member/officer group) and the Council's Registered Provider Partnership.

Local housing data is collated, analysed and published every 3 months in the Housing Facts and Figures report available on the Council's website.

<b>TITLE</b>	<b>Young People's Housing Strategy 2024-2028: <i>To provide safe, secure, and affordable accommodation for our Care Leavers, 16/17-year-olds at Risk of Homelessness and Unaccompanied Asylum-Seeking Children</i></b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	(All Wards);
<b>LEAD OFFICER</b>	Director, Place and Growth - Giorgio Framaliccio
<b>LEAD MEMBER</b>	Leader of the Council and Executive Member for Housing - Stephen Conway

**PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

To obtain the Executive's approval to progress this strategy to Full Council for consideration of the adoption of Wokingham Borough Council's Young People's Housing Strategy 2024-2028. As per Chapter 4.1.1 of the Constitution, the Council's Housing Strategies must be considered at Full Council.

This strategy outlines four strategic priorities and introduces an action plan to provide the Council's direction to assist our Corporate Parenting responsibility and provide safe, secure, and affordable accommodation for young people priority groups. These have been identified as Care Leavers, Former Unaccompanied Asylum-Seeking Children Care Leavers and 16-17 year olds at risk of homelessness. By providing a clear strategic direction, underlined by a commitment to partnership working, we aim to improve outcomes for our young people and enhance efficiency of Council services and budgets by:

1. Increasing the Council's housing options
2. Developing clear housing pathways
3. Supporting tenancy sustainment
4. Reducing homelessness and rough sleeping

This will increase housing security for our young people, increase support and variance of local affordable housing options and reduce the cost of expensive external accommodation placements. In turn, we anticipate improved outcomes for young people and the wider community through the implementation of this strategy and action plan.

**RECOMMENDATION**

That the Executive recommends that Full Council consider the adoption of Wokingham Borough Council's Young People's Housing Strategy.

**EXECUTIVE SUMMARY**

This strategy supports the delivery of the Affordable Housing Strategy and sets out the strategic direction for young people priority groups in the Borough. These have been

identified as Care Leavers, 16/17-year-olds at risk of homelessness and Former Unaccompanied Asylum-Seeking Children Care Leavers (UASCs). The Council's strategic needs data forecasts that by 2025/26 we will have responsibility for an additional 25 former UASC Care Leavers and an additional 22 Care Leavers which, if not addressed, will lead to exponentially rising costs to find alternative accommodation placements. This strategy will support those aims through four strategic priorities:

**Strategic Priority 1** – Expanding Housing Options

**Strategic Priority 2** – Developing Clear Housing Pathways

**Strategic Priority 3** – Supporting Tenancy Sustainment

**Strategic Priority 4** – Reducing Homelessness and Rough Sleeping

An action plan is included within this strategy which will monitor and evaluate this strategy against these strategic priorities. This will enable us to track our progress, and any blockages, in delivering these strategic objectives including regular reports and feedback with the Council's tenant engagement groups. The strategy will also have oversight from Member/Officer groups. The strategy does not commit additional expenditure but commits to explore opportunities to reduce spending on expensive accommodation placements for these priority groups through invest-to-save models.

This strategy was presented at Children Services Overview and Scrutiny Committee in January 2024. It was advised to incorporate commitments to securing affordable housing for veterans and affordable home ownership products for young people in the Affordable Housing Strategy, as it was not in scope of the Young People's Housing Strategy. It was also advised to review the name of this strategy to make it clear who will benefit from its introduction. To this end, a vision statement was included as a subtitle on the front page, other options were considered but not deemed suitable. Following approval at Executive, the strategy will go to Full Council in July 2024 where it is expected to be published shortly after.

## BACKGROUND

At a time of national economic turbulence and a cost-of-living crisis, it is important to ensure that the Borough's young people, and young people coming into the Borough, have the necessary housing support to navigate these challenging times. This strategy outlines the Council's strategic priorities to provide innovative solutions and consolidate resources to enable us, and our partners, to address the key challenges facing young people in Wokingham Borough.

The Council is the Corporate Parent for those in care and leaving care. This means that we have a responsibility to provide safe, secure, and affordable accommodation with accompanying support to the young people we are responsible for. An increase in the number of young people that require our support increases the financial outlay for the Council to provide this support. Therefore, this strategy will commit to increasing housing options and supported placements to ensure the Council increases its quality and quantity of accommodation placements. This will be achieved through maximising affordable housing delivery for young people through negotiations with developers, partnership working with our Registered Provider Partners and assessing our existing stock and assets. This strategy has been co-produced with young people, residents, partner agencies and the Council's expert officers. Partnership working is fundamental to the success of this strategy to address the challenges faced by these priority groups. To this end, it is important that every stakeholder this strategy supports can own their objectives within the strategy and that this is a live document owned by all involved.

The Council's previous Young People's Housing Strategy ran from 2014 to 2019 and produced several outcomes. However, given the current pressures being faced by young people and the Council, there is a need to produce a new, bespoke strategy which reflects the current pressures and trends.

In the past 6 years, the Council developed two Semi-Independent Living (SiLs) schemes at Reading Road and London Road in Wokingham. A SiL is a supported placement which provides accommodation and support to young people whilst encouraging independent living. From January 2022 to January 2023 these developments supported 8 and 11 new placements respectively. Both SiLs provide drop-in sessions to support independent living, employment, and education. The Council also has 2 x Supported Lodgings and runs the Shared Lives scheme which enables a young person with a learning disability to live in a family setting as a young adult. There is also floating housing support available across the Borough through our provider Transform Housing.

The Council now needs to build on this and is seeking to achieve the following outcomes from the new strategy, which include:

- Securing specialist accommodation through developer contributions via the provision of affordable housing
- Partnership working with our Registered Provider partners to secure specialist accommodation especially where this can be provided in addition to developer contributions
- Monitoring and applying for external grant funding opportunities to support the provision of new schemes or help with revenue funding to support more young people
- Assessing the Council's existing assets to increase its housing stock

- Working with our Local Housing Companies (Loddon Homes/Berrybrook) to deliver specialist accommodation
- Evaluating and forecasting our young people's housing needs to enable effective commissioning of accommodation
- Continued assessment of the Young People's Housing Panel and partnership working between Children Services and Housing
- Improving communication with Care Leavers who are waiting for an offer of social housing
- Explore the implementation of trainer apartments
- Sign up to the Care Leaver Covenant to embed best practise throughout the Council, and its partner's, services
- Increase support for Early Intervention to prevent homelessness at the earliest opportunity
- Undertake a cross-annual service snapshot to identify young people aged 14+ who are at risk of homelessness
- Commitment to ensure young people do not need to present as homeless in order to be accommodated

Moving forwards, the Medium Term Financial Plan for 2024/25 includes an allocation to delivering supported accommodation for Care Leavers at Seaford Court as well as an allocation to develop Care Leaver accommodation at Wellington Road. This demonstrates our pipeline of delivery for providing additional affordable homes for young people priority groups, a key priority of this strategy.

The Young People's Housing Strategy will sit under the Affordable Housing Strategy as the master housing strategy and alongside other housing strategies such as the Homelessness and Rough Sleeping Strategy and an anticipated Older People's Housing Strategy. This strategy outlines how the Council will support the strategic priorities within the Affordable Housing Strategy and wider Council strategies. An action plan will accompany this strategy which will outline the key deliverables and milestones through the strategy period. This action plan will be updated and refreshed annually and overseen by the Young People's Housing Panel.

Members, Officers, stakeholders, and the public have had the opportunity to respond to the consultation on the draft strategy. The consultation was sent out across the Council, to all Members, the Parish and Town Councils, the RP Partnership, TLIP, DLUHC, DfE, Homes England, partner agencies and local charities. It will also be publicised through a press release and our social media. As part of the consultation, we will ask questions around whether consultees agree with the objectives set out in the strategy, what challenges they think the Borough is facing in terms of housing young people, and what fundamental outcomes they would like to see from the delivery of the strategy.

## **BUSINESS CASE**

The last four years since the COVID-19 pandemic have had an adverse and disproportionate impact on young people. A national study completed by Homeless Link in 2021 demonstrated that the pandemic had an impact on youth homelessness as the pressure of lockdowns led to an increase in family breakdowns and services reporting worsening mental health and drugs and alcohol misuse. The subsequent cost-of-living crisis has also contributed to a decrease in the quality and value of the private rental market nationally. Consequently, Centrepoin estimates that 129,000 approached their



council to avoid homelessness in 2022, this figure excludes a significant number who do not present but would meet the homelessness or rough sleeping definition. Locally, a similar picture is forming with 200 homelessness approaches from young people in the 12 months up to October 2023. There is a causal link between this increase and national economic turbulence, with private rents and evictions at an all-time high. This decreases housing security for families and strains relationships leading to a rise in family breakdowns, the leading cause of 16/17 year olds being at risk of homelessness. This is evidenced in Wokingham with the Council's strategic needs data forecasting that by 2025/26 we will have responsibility for an additional 25 former UASC Care Leavers and an additional 22 Care Leavers which, if not addressed, will lead to exponentially rising costs to find alternative accommodation placements.

The draft Young People's Housing Strategy has four key priorities, outlined below:

### **Strategic Priority 1 – Expanding Housing Options**

Increased provision to provide a range of options to suit the different needs of each young person with an emphasis on the right homes in the right places cognisant of the individual contexts and requirements of support for each young person. This involves maximising our resources and our partnerships with external partner agencies including government and our Registered Provider partners.

### **Strategic Priority 2 – Developing Clear Housing Pathways**

The Council has a Corporate Parenting Duty to young people in our care. As well as having sufficient housing options, our young people need to have a robust and planned housing pathway. This priority will ensure our young people have greater confidence in their housing security and the right support in order to fulfil this pathway.

### **Strategic Priority 3 – Supporting Tenancy Sustainment**

Care Leavers have the lowest rates of tenancy sustainment and highest rental arrears compared to the Council's other residents. This makes it more challenging to fulfil a safe and secure home. This priority outlines how we can best support our young people to become tenancy ready which will increase their housing options and reduce financial pressures on the Council.

### **Strategic Priority 4 – Reducing Homelessness and Rough Sleeping**

As a Corporate Parent, it is the Council's responsibility to ensure that no young person within our care experiences homelessness or rough sleeping and where it does occur it is rare, brief and non-recurrent. This priority will look to increase support for our most vulnerable young people through the delivery of projects such as the Single Homelessness Accommodation Programme whilst increasing support for early intervention to stop homelessness at the earliest possible stage.

### **Next Steps**

The strategy was released for public consultation on the 18<sup>th</sup> January 2024 which concludes on the 18<sup>th</sup> February 2024 before it is considered at this Executive meeting prior to consideration at Full Council in March 2024 before publication shortly after. The

strategy will run for 4 years up to 2028 and progress against the strategic priorities will be assessed throughout including annual reviews of the action plan.

## FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	nil	Yes	
Next Financial Year (Year 2)	nil	Yes	
Following Financial Year (Year 3)	nil	Yes	

### **Other Financial Information**

One of the key outcomes this strategy seeks to address is cost avoidance and exploring opportunities to invest to save. However, it is not possible to cost these individual savings until business cases for specific schemes or initiatives have been explored in more detail. An action plan accompanies the strategy which will assist the monitoring of this strategy against financial outcomes.

The capital and revenue approvals needed to enact this strategy will be sought and contained within the annual budget setting process whilst external grant funding opportunities will be sourced and pursued in order to maximise the outputs of this strategy.

### **Legal Implications arising from the Recommendation(s)**

This report and decision making process arising from the same has been considered by the Legal Officer within the context of the Constitution and public law.

### **Stakeholder Considerations and Consultation**

Public consultation released on the 18<sup>th</sup> January 2024 and concluded on the 18<sup>th</sup> February 2024.

### **Public Sector Equality Duty**

A Stage 1 Equalities and Impacts Assessment has been undertaken and found only positive or neutral impacts on each demographic, so a Stage 2 assessment is not required.

### **Climate Emergency – *This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030***

This strategy will sit under the Affordable Housing Strategy (2024-2028) which has committed to procure additional affordable and sustainable homes in line with the Climate Emergency Action Plan to do as much as possible to achieve carbon neutrality by 2030 by achieving the EPC and efficiency KPIs stated within. Therefore, any

additional homes procured for young people as a result of this strategy will adhere to the same strategic commitment.

**Reasons for considering the report in Closed Session**

N/A

**List of Background Papers**

Enclosure 1 - Young People's Housing Strategy Draft

Enclosure 2 - Young People's Housing Strategy – Stage 1 EQIA

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# Young People's Housing Strategy

*To provide safe, secure, and affordable accommodation for our Care Leavers, 16/17-year-olds at Risk of Homelessness and Unaccompanied Asylum-Seeking Children*

2024-2028

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## Strategy on a Page

Summary of Young People's Housing Strategy 2024-2028				
Strategic Priority	1. Expanding Housing Options	2. Developing Clear Housing Pathways	3. Supporting Tenancy Sustainment	4. Reducing Homelessness and Rough Sleeping
Over the last 4 years we have:	<p>Built a Semi-Independent Living home for 7 Care Leavers.</p> <p>Purchased two Children Homes in the Borough.</p> <p>Completed the Transitions House project for those with additional requirements assisting their transition into adulthood.</p>	<p>Created a Young People's Housing Panel which has reduced use of temporary accommodation and increased social housing offers for Care Leavers.</p> <p>Improved collaboration between Housing and Children Services which has increased tenancy sustainment whilst reducing evictions and wait times for housing.</p> <p>Implementation of Rent Guarantee Scheme to support move-on into the Private Rented Sector.</p>	<p>Successfully applied for the Staying Close funding from the DfE to provide bespoke support for tenancy sustainment. This will lead to more successful transitions to independent living for our Care Leavers.</p> <p>Introduced the Rent Guarantee and Rent in Advance Schemes to assist residents moving into the Private Sector.</p> <p>Revised our Allocations Policy to better suit the needs of our residents, including for our Care Leavers and young people.</p>	<p>Successfully applied for the Single Homelessness Accommodation Programme.</p> <p>Recruited a Young Person's Housing Navigator.</p> <p>Duty to Refer embedded in the Young People's Housing Protocol and our housing services.</p>
In the next 4 years we aim to:	<p>Secure accommodation for our young people through affordable housing negotiations.</p> <p>Expand the Private Sector Landlord Forum to increase move-on options.</p> <p>Encourage our Registered Provider Partners, including our Local Housing Companies, to deliver more accommodation for our young people.</p> <p>Monitor external grant funding opportunities.</p> <p>Assess existing Council assets to increase housing stock for our young people.</p>	<p>Evaluate the Young People's Housing Needs Assessment to help plan young people's housing pathways.</p> <p>Ensure that when a young person becomes looked after at aged 16/17, they are assigned a Personal Advisor and a Social Worker.</p> <p>Continued assessment of the Young People's Housing Panel's effectiveness between Children Services and Housing.</p> <p>Continue our commitment to not place young people in temporary or emergency accommodation.</p>	<p>Improve communication with Care Leavers whilst they are waiting for their offer of social housing.</p> <p>Explore the delivery and implementation of trainer apartments.</p> <p>Explore additional support to increase young people's tenancy sustainment.</p> <p>Sign up to the Care Leaver Covenant to embed best practise in our, and our partners, processes.</p>	<p>Deliver the Single Homelessness Accommodation Programme funding.</p> <p>Undertake an annual cross-service snapshot to identify young people aged 14+ who are at the highest risk of homelessness at 16/17.</p> <p>Explore how to increase support for early intervention to reduce homelessness.</p> <p>Commitment to ensure young people do not present as homeless in order to be accommodated.</p> <p>Lobby government for more funding and support.</p>

## Glossary

**Care Leaver** - Someone who has been in the care of the Local Authority for a period of 13 weeks or more spanning their 16th birthday.

**Duty to Refer** – Public authorities to notify the Council that a person who has engaged with them might be homeless or at risk of homelessness.

**Personal Advisor** – Appointed from the age of 16 to support and prepare for independence up to the age of 25.

**National Transfer Scheme** – A government initiative re-introduced in 2021 to ensure an even distribution of UASCs across local authorities across the country.

**Registered Provider** – Housing Associations or Local Authorities that provide social housing.

**Unaccompanied Asylum-Seeking Children (UASCs)** – Children and young people who are seeking asylum but who have been separated from their parents or carers. Whilst their claim is being processed, they are cared for by a local authority.

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## Foreword – Cllr Stephen Conway

Increasingly young people are being held back by the housing crisis and are frequently locked out of the social rented sector in this country, having to turn to an unaffordable private rented sector, live in temporary accommodation or risk homelessness. As a local authority we want to try and change that narrative and help provide stable and suitable accommodation options for those vulnerable young people who live in and come into our Borough. This strategy focuses particularly on those vulnerable groups (Care Leavers, 16/17-year-olds at risk of homelessness and former Unaccompanied Asylum-Seeking Children Care Leavers), but this does not come without acknowledgement of all those young people who are finding it harder to access affordable housing or get themselves onto the housing ladder. Our Affordable Housing Strategy 2024- 28 provides strategic direction for affordable housing generally, with one of our main aims to maximise the delivery of affordable housing and housing options so that all residents can access stable and suitable accommodation when they are in need.

We are already a Corporate Parent for those children and young people who are looked after by us, and it is our responsibility to provide the best possible care and safeguarding for these young people. Throughout the last few years, we have seen a number of factors contribute to make it harder for young people to access affordable housing with an accompanying increasing demand for accommodation and support services.

As well as having a roof over their heads, many of our young people will require additional support for tenancy sustainment, education, employment and beyond. This needs to be tied into a clear housing pathway that is built in collaboration with the young person by the people that they trust. We have already had great success in securing grant funding to provide additional and innovative support to assist with life skills as well as more complex support for those who require it. This will ensure that we have a range of accommodation and support packages to enable the pursuing of healthy and independent living regardless of the young person's individual situation. This strategy seeks to continue to source and expand our options for supporting our young people on their housing journey.

More generally, by increasing our options of local, good quality and sustainable housing, we can provide an improved housing service, mitigate against expensive out of Borough placements, and take ownership of the quality of accommodation and services provided.

Finally, I would like to underline our commitment to partnership working with our Registered Providers and the third sector in Wokingham to provide the best possible housing pathway to the young people this strategy focuses on. At a time when demand for housing, and the cost of meeting this demand is at an all-time high, it is more important than ever before to seek creative solutions to the myriad of issues we are facing. I am committed to delivering this strategy with our partners, and supporting the opportunities it will create, to improve outcomes for young people's housing and strengthen our resilience to the increasing challenges faced.

**Councillor Stephen Conway**

**Leader of the Council and Executive Member for Housing and Partnerships**

## Introduction

At a time of national economic turbulence and a cost-of-living crisis, it is important to ensure that the Borough's young people, and those young people coming into the Borough, have the necessary support to navigate these challenging times. This strategy will outline our strategic priorities to provide innovative solutions and consolidate resources to enable us and our partners to address the key challenges facing our young people.

This document sets out the strategic direction for our priority groups in the Borough. These have been identified as Care Leavers, 16/17-year-olds at risk of homelessness and former Unaccompanied Asylum-Seeking Children Care Leavers (UASCs). We have significant financial pressures, partially caused by the increase in cost and quantity of placements for our young people. Currently, we do not have enough suitable placement and cost-effective housing options to meet the needs of our young people. Our Young People's Housing Needs assessment forecasts that by 2025/26 we will have responsibility for an additional 25 former UASC Care Leavers and an additional 22 Care Leavers which, if not addressed, will lead to exponentially rising costs to find alternative private accommodation placements. The four strategic priorities that this strategy will commit to deliver to improve outcomes for our young people priority groups are:

**Strategic Priority 1** – Expanding Housing Options

**Strategic Priority 2** – Developing Clear Housing Pathways

**Strategic Priority 3** – Supporting Tenancy Sustainment

**Strategic Priority 4** – Reducing Homelessness and Rough Sleeping

We are the Corporate Parent for those in care and leaving care. This means that we have a responsibility to provide safe, secure, and affordable accommodation with accompanying support. An increase in the number of young people that require our support increases our financial outlay to provide this support. Therefore, this strategy will commit to increasing housing options and supported placements to ensure we are able to increase the quality and quantity of accommodation placements with a view to reducing the overall financial impact and improving outcomes.

This strategy has been co-produced with young people, residents, partner agencies and our expert officers. Partnership working is fundamental to the success of this strategy to address the challenges faced by these priority groups. To this end, it is important that every stakeholder this strategy supports can own their objectives within the strategy and that this is a living document owned by all involved.

An action plan has been developed alongside this strategy which will monitor and evaluate the progress of this strategy against the strategic priorities. This will enable us to track our progress and any blockages in delivering these strategic objectives including regular reports and feedback from our young people and our tenant engagement groups. This will ensure the strategy is held to account by those who will be directly affected by it.

## National and Local Context

### National Picture

The last four years since the COVID-19 pandemic have had an adverse and disproportionate impact on young people. A national study completed by Homeless Link in 2021 demonstrated that the pandemic had an impact on youth homelessness as the pressure of lockdowns led to an increase in family breakdowns and services reporting worsening mental health and drugs and alcohol misuse.<sup>1</sup>

The cost-of-living crisis has also contributed to a decrease in the quality and value of the private rental market nationally. Consequently, Centrepoin estimates that 129,000 approached their council to avoid homelessness in 2022, this figure excludes a significant number who do not present but would meet the homelessness or rough sleeping definition.<sup>1</sup>

### Local Picture

Locally, a similar picture is forming with 200 homelessness approaches from young people in the 12 months up to October 2023. There is a causal link between this increase and national economic turbulence, with private rents and evictions at an all-time high. This decreases housing security for families and strains relationships leading to a rise in family breakdowns, the leading cause of 16/17 year olds being at risk of homelessness.<sup>1</sup> With increased demand for our services, at a time of significant financial pressure, it is important to evaluate how we can continue to improve outcomes for our young people.

In 2023, Children Services commissioned the Young People’s Housing Needs Assessment to understand anticipated demand of our young people and their expected housing pathways. The number of Care Leavers and former UASCs Care Leavers that require affordable housing over the next 4 years is forecasted at 172 placements. These placements have been identified across a variety of provisions to meet identified need. This data is taken from the Young People’s Housing Needs Assessment which used predicted housing pathway plans to form this anticipated need:

Placement	Total expected demand up to 2027
Semi-independent	43
Staying Put	11
Supported Lodgings	20
Independent tenancy/HMOs	94

FIGURE 1 - FORECAST ACCOMMODATION PLACEMENTS

A significant portion of this number relates to former UASC Care Leavers. In Wokingham, this number has increased significantly since 2022 following the National Transfer Scheme

(NTS) becoming mandatory. From 15 February 2022, all local authorities in the UK were directed to participate in the NTS. This meant that local authorities are required to take 0.1% of their child population which translates to a total number of 41 UASCs for Wokingham up from 28 the previous year but only 6 the years preceding. Whilst this may not seem a large increase initially, it creates an exponential increase in the number of former UASC Care Leavers we have a responsibility to provide accommodation for (see Figure 1). These children tend to enter care late, ageing out to Care Leaver status quickly. On average, UASC accommodation costs £100,000 over their Care Cycle with the difference in grant subsidy from government increasing significantly once they become a Care Leaver. It is predicted that this will place an additional unfunded financial cost of £1,100,000 by 2025/26 if we do nothing to mitigate these increases.

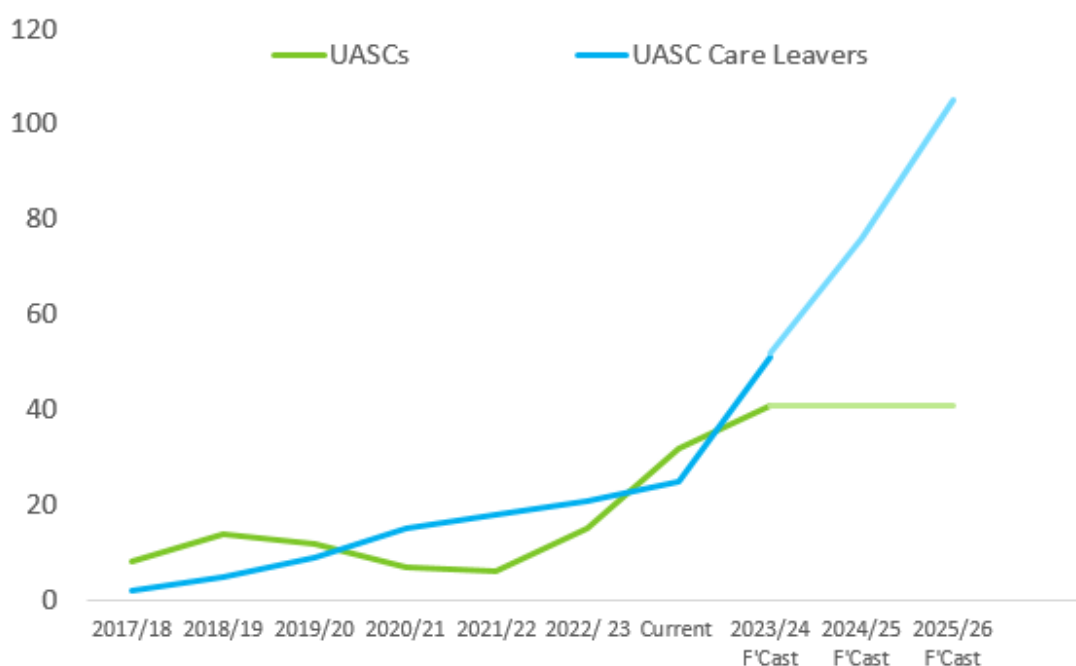


FIGURE 2 - FORECASTED INCREASE IN UASCs

These UASC placements are in addition to an anticipated increase in the number of young people leaving care:

- Since 2016/17, we have experienced an increase year on year in the number of Care Leavers
- Each year, between 12 and 15 young people leave care in Wokingham Borough
- From 2016/17 to 2022/23 we saw an increase of 41 Care Leavers (see Figure 3)
- We are anticipating that the number of non-UASC Care Leavers we are responsible for will continue to increase up to 99 by 2026/27

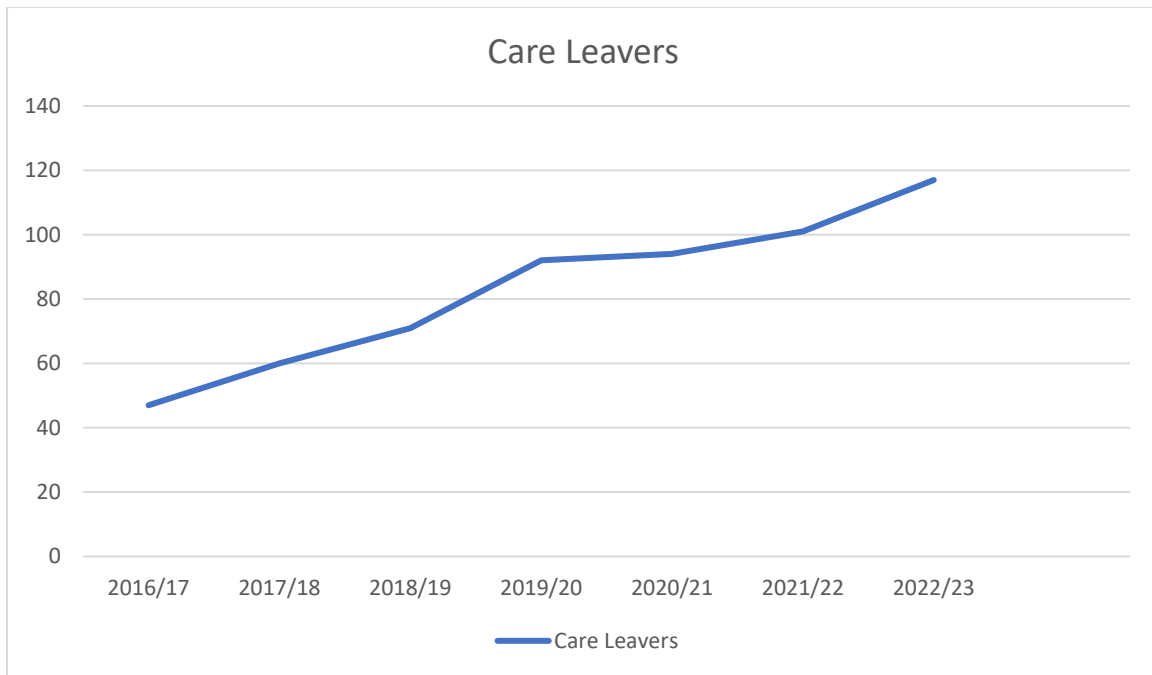


FIGURE 3 – NUMBER OF CARE LEAVERS OVER THE LAST 7 YEARS

Each young person priority group will have different requirements for their accommodation needs, requiring a flexible and adaptive approach to procuring and commissioning additional accommodation.

Due to this increasing need, in the past 6 years, we have developed two Semi-Independent Living (SiLs) schemes at Reading Road and London Road in Wokingham. From January 2022 to January 2023 these placements supported 9 and 7 new placements respectively. Both SiLs have staff on-site 24/7 who support with independent living, employment, substance misuse, emotional wellbeing, finances, and develop a bespoke support plan for each young person. We also have 2 x Supported Lodgings and run the Shared Lives scheme which enables a young person with a learning disability to live in a family setting as a young adult. There is also floating housing support available across the Borough through our provider Transform Housing. These measures have mitigated some of the impacts of the rising number of young people requiring assistance. However, the size of the forecasted increase requires strategic direction to pool Council resources to improve outcomes for our young people. This data has informed the creation of this strategy and will be used to tailor affordable housing commissioning for our young people priority groups to develop housing options that will increase provision for a variety of needs and contexts.

## Partnership Working

We are committed to co-production through increased collaborative working with our young people, internal departments, Registered Provider Partners (RPs), Local Housing Companies (Loddon Homes and Berrybrook Homes), our third sector partners and government agencies. Due to our limited resources and assets, improving efficiencies through joined up working is the most effective way to increase provision and service quality for our young people. Therefore, this strategy seeks to integrate partnership working as a golden thread running through our approach to improving our housing offer for young people.

In 2022, we created the Young People's Housing Panel to ensure Housing and Children Services had holistic input into forming pathways for those we have a Corporate Parenting responsibility for. This has improved outcomes by providing an intersectional view from all services on the individual pathway plans relevant to the context of each young person. This includes a 77% reduction in the number of Care Leavers being placed in temporary or emergency accommodation since the panel's inception. This commitment to this collaborative working is embedded throughout this strategy with a focus on emboldening the good progress already made to further improve processes and outcomes.

In 2023, we renewed and expanded our Registered Provider Partnership to include 9 RPs to unlock an increase in the delivery of affordable homes to further our strategic priorities for our priority groups. The action plan for this partnership requires each partner to deliver at least 1 development with a proportion of specialist housing. This could include Care Leaver accommodation or bespoke accommodation for young people with additional requirements. This includes exploring how we can work with RPs to convert new developments into affordable housing for our young people. We also work closely with the South-East Strategic Migration Partnership and other Local Authorities to share best practice and innovation with partners experiencing a similar level of increased need in relation to our responsibility to accommodate UASCs.

These initiatives have laid the foundation for us to build on our commitment to partnership working. This strategy encourages cooperation to fulfil the direction outlined in the four strategic priorities. This includes a commitment to lobby government, in tandem with other local authorities, for more funding to empower our provision for young people. Finally, we also aim to sign up to the Care Leaver Covenant to ensure best practice and latest guidance is embedded throughout our, and our partners', services.

## Strategic Priority 1 – Expanding our Housing Options for Young People

Over the last 4 years, we have delivered 928 affordable housing dwellings across a range of tenures including for social rent and discounted home ownership products such as shared ownership. This has increased the number and range of options for all our residents but the numbers on the housing register have persisted at approximately 1,500. In addition, we anticipate that we require 172 placements to accommodate our young people priority groups over the next 4 years up to 2028. Therefore, it is critical that we commit to expanding our housing options across a variety of different placements to accommodate the range of needs of our young people.

We need to increase the supply of smaller properties for young people with a focus on social rented accommodation, with additional support where appropriate. In addition, there is a need to increase move-on options from emergency and short-stay accommodation within the Borough. This is because a lack of supply has led to an increase in out of area placements as well as residents staying in expensive and unsuitable short-term accommodation. This issue is exacerbated by UASCs not having leave to remain which prevents the claiming of benefits or being able to hold a tenancy, so their only option is to remain in supported short-stay accommodation despite not needing the support on offer. These placements often do not offer value for money and are more likely to lead to a 'cliff-edge' of support and accommodation. Therefore, there is a commitment in this strategy to procure additional short-term placements in Borough. Increasing our locally managed placements will increase the quality of support on offer, help immerse our young people in the local community, and enable them to access localised support.

Due to increasing need and pressure on our housing resources, there is a need for additional options for the young people identified in this strategy. A variety of options will be promoted in this strategy including the commissioning of HMOs, acquisition of children's homes to keep our children in care locally, Staying Put placements and increase in SiL provision to keep our young people local and close to their networks. This includes expanding and strengthening our Private Sector Landlord Forum to give confidence to landlords to accommodate young people leaving care through Rent Guarantee and Rent in Advance schemes. Currently, there are limited options in the private rented sector for young people so this will create independent placements for those who are ready, supported by the outcomes of strategic priority 3.

In addition, continued assessment of our stock and development pipeline will be undertaken to ensure that, where appropriate, we are maximising accommodation options for our Care Leavers. We will also apply for any grant funding opportunities that could assist that are released from government or any other capital or revenue opportunities to increase our sufficiency and provision for young people with additional needs.

The Strategic Housing team is working closely with Children Services to expand provision through assessing our existing assets, securing affordable housing through developer contributions, encourage delivery of bespoke housing for young people through our Registered Providers, accessing government grant initiatives and exploring the delivery of HMOs and children's homes. The Strategic Housing team negotiates designations for suitable dwellings with developers on new developments as part of their affordable housing contribution. On-site delivery of the affordable housing is prioritised where appropriate for young people in urban locations with good transport links and access to municipal facilities. However, where impractical, a commuted sum is sought which is used to help fund additional affordable housing, including for young people.

Our development pipeline includes a delegation for 5 x Care Leaver designated dwellings as part of a new development in Wokingham Town Centre which is expected to be occupied by 2026. This will provide additional accommodation placements with proximity to the Reading Road SiL. In addition, we have commissioned a 12-bed Supported Lodgings placement including 2 x emergency beds to increase provision for young people who require additional support. We will also monitor other emerging challenges and opportunities throughout the period of the strategy.

**In the next 4 years, we aim to:**

- Encourage and monitor young people specialist housing delivery amongst our Registered Provider partners.
- Actively improve relations with landlords in the private rented sector to increase move-on options for young people through the Private Sector Landlord Forum.
- Negotiate specialist young people housing as part of affordable housing negotiations with developers and monitor the number of properties achieved through this mechanism.
- Explore the delivery of HMOs, Children Homes, Staying Put placements and temporary accommodation.
- Assessment of the Council's existing assets to increase provision of affordable or specialist housing.
- Deliver 5 x 1-bed apartments at the Wellington Road development in Wokingham.
- Increase local semi-independent accommodation for our care leavers and former UASCs to ensure that they are able to remain local and connected to their networks.
- Review emergency/short term assessment accommodation needs.
- Commission and establish a contract for Supported Lodgings beds.



## Strategic Priority 2 – Developing Clear Housing Pathways

A clear housing pathway is critical to the success of the young person's housing journey as it enables them to have confidence in their housing security and prepare for their onward accommodation pathways. This will enable us to commission the right placements in the right locations whilst enabling our young people to benefit from having a stable home.

Care Leavers are supported by Here 4 U and Children's Services to create a housing pathway plan in conjunction with their overall care and support plan. Care Leavers are supported by a Social Worker up to the age of 18. At 16/17, they are assigned a Personal Advisor who provide support and assist with creating a pathway plan. Pathway planning usually begins before the young person's 16<sup>th</sup> birthday and is bespoke to the individual needs and context of the young person's situation and personal circumstances. At 18, Care Leavers stop receiving support from their Social Worker and the Personal Advisor now supports them in their housing pathway, education, and employment.

The planning of our young people's housing journey involves different discussions with family members, carers, social workers, Personal Advisors, the Young Person's Housing Navigator, the Preparing for Adulthood Team, the Community Mental Health Team and the Children in Care Child and Adolescent Mental Health Service. It is important to be aware of all relevant cases at the earliest opportunity, usually at 14 years old, to enable the planning and commissioning of support and accommodation. Commissioners in Housing and Children Services being able to anticipate the pathways of our young people, enables us to have a range of options for different scenarios. This also ensures the young person has greater confidence in their housing security, both through care and into their future accommodation pathways.

To this end, this strategy commits to embolden the Young People's Housing Needs Assessment data that maps out the expected housing pathways and needs of our priority groups. This will enable improved commissioning of an accommodation pipeline through the methods outlined in strategic priority 1, as well as creating an expected pipeline of demand from our young people currently in care. By intertwining the strands of accommodation provision and analysis of upcoming demand, we can match each young person to a housing pathway that best suits their individual circumstances.

We have a statutory duty to undertake a needs assessment and develop pathway plans for all eligible children aged 16/17. This must be reviewed every 6 months until the young person is 21. One way to improve partnership working and understand the needs of our young people is through the development of joint assessments between Housing and Children Services for young people aged 16 or 17 who are at risk of homelessness. This new approach will be embedded as part of this strategy's review of the Young People's Housing Panel. The Young Person's Homelessness Prevention Officer role was changed to the new Young Person's Housing Navigator job description in October 2023 and moved into the Rough-Sleeper Team. This has enabled greater resilience and support for Care Leavers, their

PA's and wider Council services through providing expert homelessness and housing advice, emphasising our role as Corporate Parent and increasing the quality and consistency of 16/17 year old's Joint Assessments.

As part of our Corporate Parenting Duty, Care Leavers are given more than one chance to sustain their tenancy. This could mean working with the young person on actions that would usually result in eviction to ensure that they don't happen again. This strategy commits to strengthening and expanding this commitment to encourage our RP partners and private sector landlords to adopt a similar approach wherever possible. We have also committed to not use Bed and Breakfast temporary or emergency accommodation for 16/17-year-olds due to its unsuitability for this cohort. Introduced in 2022, this panel has already improved outcomes for young people's housing pathways through improved communication and inter-departmental collaboration enabling a holistic approach to each Care Leaver's accommodation pathways. Critically assessing the progress and impact of the Young People's Housing Panel will improve outcomes and partnership working by ensuring each stakeholder is accountable to the priorities and objectives outlined in this strategy.

Most placements for former UASC Care Leavers are outside Wokingham Borough because of the limited supply of suitable placements. The fact that London has the greatest density of diverse placement options which is more likely to meet the young person's cultural identity needs is another contributing factor. The impact of placing out of area is that, in line with the forecasted increase in former UASC Care Leavers, they will have less access to local education, training, and health support or be able to obtain local authority affordable housing. We can address this challenge by recruiting and training more local fostering and supported lodgings carers alongside developing community links and specialised staff and resources. This is in addition to the commitment to increase local provision for this group in the form of HMOs outlined in strategic priority 1. This process will be managed by the Young People's Housing Panel to enable the mapping of appropriate housing pathways for this cohort. In turn, more young people placed within or close to Wokingham will allow us to develop more 16+ accommodation and support options.

The Young People's Housing Panel was created to improve pathway creation for young people with additional learning, mental and physical needs who have additional challenges in securing safe, secure, and affordable accommodation. The level of support required for each young person will vary based on their circumstances. However, it is important that we have a range of options to cater for a variety of different needs. The transition into adulthood presents additional challenges which may require support from us. Partnership working between the various agencies responsible for the young person's transition is vital.

As of August 2023, the Preparing for Adulthood team manages 220 young people with some level of additional needs. Residents are provided with a care plan from the age of 14. Therefore, it is vital that information sharing between us, and third-sector agencies is completed to ensure these young people are provided with available support. This involves improved partnership working between the Young People's Housing Panel, Specialist Housing Panel, Adult Social Care Housing Panel and Sexual/Exploitation Multi-Agency Conferences (SEMRAC). This strategy commits to ensuring housing pathways for our young

people with additional needs are appropriately addressed. This process will be monitored at the Young People's Housing Panel.

**In the next 4 years, we aim to:**

- Identify how we can accommodate young people without them approaching as homeless.
- Continue our commitment to not place young people in temporary or emergency accommodation.
- Continued assessment of the Young People's Housing Panel's effectiveness between Children Services and Housing.
- Evaluation of the effectiveness of the Young People's Housing Needs Assessment in planning young people's housing pathways.
- Increase the provision of local fostering and supported lodgings carers, specifically for UASCs to enable them to Stay Put.
- Creation of a UASC Steering Group to commission and plan strategic placement of new accommodation options.

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## Strategic Priority 3 – Supporting Tenancy Sustainment

Young people under our Corporate Parenting responsibility should expect the same level of care and support that other young people receive from their parents. To receive support, they must have been in care for at least 13 weeks between the ages of 14 and 16 or for 13 weeks after their 16<sup>th</sup> birthday as well as some additional qualifying factors outlined in the Local Offer for Care Leavers. The Local Offer contains information about services which may assist in preparing for adulthood including support for: accommodation, education, training, employment, health and wellbeing, finances, relationships, and participation in society. We recognise that Care Leavers leave care at a significantly younger age than their peers would leave their family home. This strategic priority focuses on ensuring each young person has a successful transition into their first independent tenancy or move-on placement. One example of how this will be achieved is delivery of the Staying Close pilot outlined in Case Study 1 below.

Care Leavers have lower rates of tenancy sustainment and higher rental arrears than our other residents. Amongst our stock, the difference in average debt between these groups is £609 in total debt. This significant difference can be attributed to adverse childhood experiences among other factors outside of our control. However, by having a clear housing pathway, we can provide tenancy sustainment support and signpost to our third-sector partners. By ensuring our young people are tenancy ready, we expect to reduce rental arrears amongst our, and our RP Partner's stock, as well as giving more confidence to private sector landlords to accommodate Care Leavers.

Appropriate housing and support services play a crucial role in our preventative strategies to enable young people to live successfully in the community. The encouragement of self-reliance and independent living will positively contribute towards increasing our young people's tenancy sustainment and reduce the likelihood of requiring expensive care services. Therefore, we have a responsibility to ensure Care Leavers are tenancy ready, equipped to work, have access to education and are sign-posted to develop key life skills. This strategy introduces a range of processes to ensure our young people enter their housing pathways with an understanding of the expectations and skills required to live independently. This includes ensuring children on the edge of care receive early housing advice and guidance and have a defined housing pathway. In turn, this will increase tenancy sustainment and reduce rent arrears, with the young person aware of expectations in their new placement.

We also commit to continuing the policy of giving young people more than one chance to sustain their accommodation, recognising that a flexible approach is the best way to increase tenancy sustainment. We will also encourage our RP partners to adopt a similar approach where appropriate. Wraparound support is critical to preventing failed tenancies through early intervention of the causes of any tenancy sustainment issues. To this end, we will explore business cases to increase specialised tenancy sustainment support for Care Leavers. This will be completed in conjunction with an exploration into the benefits and

practicality of completing Wokingham's first trainer apartments to provide young people with a short-term tenancy to trial living independently in a safe and supported environment.

A proven method to develop independent living skills is through a Staying Put arrangement.<sup>1</sup> These provide both accommodation and support to help young people develop the skills and behaviour necessary to make a successful transition into independent adult life. This strategy commits to exploring the expansion of Staying Put placements to increase the variety and quantity of housing options for our young people. However, not all young people will require a supported accommodation placement. Therefore, we also need to increase tenancy sustainment support for those who are moving into independent tenancies. We can do this by signposting our young people to the suite of support on offer from both us and our third-sector partners once we have created their clear housing pathway. In addition, we will explore how to improve access to furniture and essential white goods so that our young people move into furnished properties.

To embed these commitments throughout our, and our partners' activities, there is an ambition to sign-up to the Care Leaver Covenant to ensure that every agency we work with is committed to ensuring the best provision and service for Care-Leavers. This golden thread will be a standard that each agency can refer to when supporting our Care Leavers and will homogenise standards in line with national best practise.

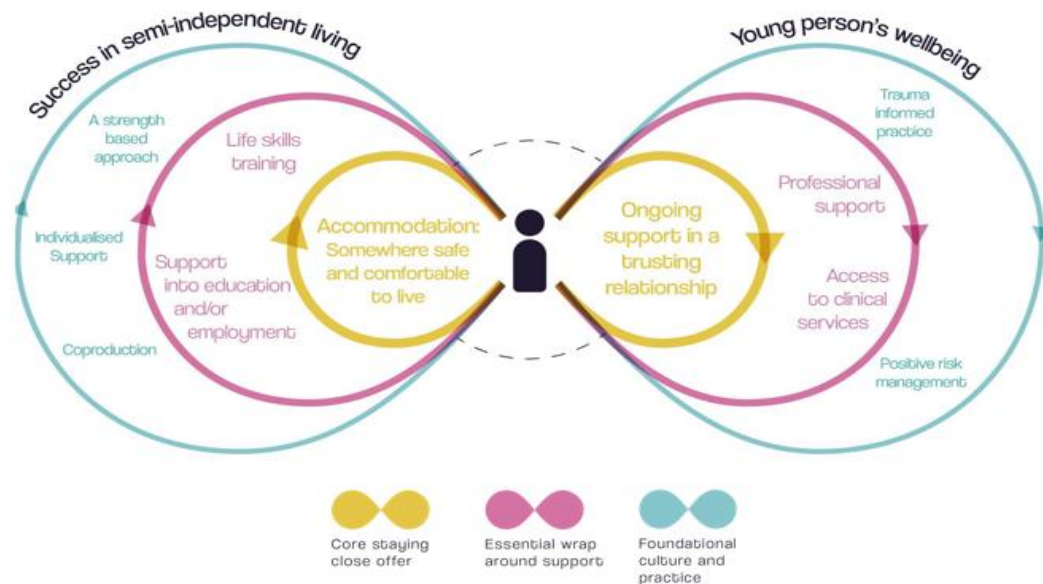
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<sup>1</sup> Staying Put – The young person will stay with their foster parent and make a contribution towards rent and bills.

## Case Study 1 - Staying Close

To promote tenancy sustainment amongst our Care Leavers the Council was successful with a funding application for the Department of Education's Staying Close pilot initiative. Staying Close is a new initiative that provides funding to ensure Care Leavers have access to a trusted person once they have moved into an independent tenancy. The Council secured revenue funding for 2 years up to 2025 to assist 14 Care Leavers with additional support with a trusted person once they have moved on from one of our two Semi-Independent Living provisions.

# The Staying Close Framework



**In the next 4 years, we aim to:**

- Review the quality and accessibility of information available on our website for young people. Especially in terms of signposting options for parents' of 16/17 year olds.
- Successful delivery and implementation of the Staying Close grant funded project.
- Avoid any Care Leavers moving into empty properties with no essential white goods and furniture. Either allow more time for these purchases or explore options to furnish the property to a basic level.
- Lobby government in partnership with other Local Authorities for more funding and support to empower our provision for our young people priority groups.
- Sign up to the Care Leaver Covenant to ensure best practise is embedded throughout the Council and encourage our partners to do the same.
- Explore whether we can fund additional support for Care Leavers to increase tenancy sustainment.
- Explore the delivery of trainer apartments for young people.

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## Strategic Priority 4 – Reducing Homelessness and Rough Sleeping

Homelessness and rough sleeping can have a significant and disruptive impact on the lives of anyone who experiences it, especially with young people. The causes of rough sleeping are varied and contextual to everyone who experiences it. However, young people who have led traumatic lives are more likely to experience homelessness or rough sleeping. For example, if a young person experiences significant adversity in the form of Adverse Childhood Experiences (ACEs), then they are 16 times more likely to experience rough sleeping.<sup>2</sup> Homelessness is disruptive to people's lives and causes insecurity and instability in our communities. We have adopted DLUHC's definition of ending rough sleeping: 'to ensure any rough sleeping is prevented wherever possible and, where it does occur, it is rare, brief, and non-recurrent'. We aim to prevent homelessness and rough sleeping wherever possible using creative solutions, maximising grant opportunities, and providing the right level of support to enable our young people to thrive in their housing journeys.

This strategy also seeks to increase our ability to intervene at the earliest possible stage. Early intervention is essential to reduce the number of children that experience homelessness or rough sleeping and that enter our care system. Homeless Link's 'Young and Homeless' study shows that family breakdown is the leading cause of youth homelessness and support is usually received too late.<sup>3</sup> Early intervention is also important in ensuring the prevention of repeat homelessness, minimising disruption to children's education, mitigating the loss of family support networks and reducing debt and poverty.

Our approach to early intervention provides targeted support once a young person has been identified as at risk of homelessness. This support includes anticipating what support the context of each individual situation requires. This involves a three-step process:

1. Signposting families to support services to keep them in control of resolving issues.
2. Stepping in to prevent issues escalating and requiring specialist services or accommodation.
3. When appropriate, using specialist intervention to deliver permanent resolutions.

By targeting support and signposting families to information on addressing the fundamental causes of homelessness, we can mitigate the number of 16/17-year-olds at risk of homelessness. We employ a Homelessness Early Intervention Officer covering all homelessness cases who has a success rate of 99% in their cases in ensuring residents do not experience rough sleeping. Building on this will be critical to preventing the number of young people who rough sleep in Wokingham. One way to improve our early intervention

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<sup>2</sup> Homelessness and Childhood Adversity, Public Health Wales, 2019.

<sup>3</sup> Young and Homeless, Homeless Link, 2021.



services is through the undertaking of an annual cross-service snapshot to identify young people aged 14+, not in our care, who are most at risk of homelessness at 16/17. This will be completed as part of the improved partnership working arrangements between Children's Services and Housing and monitored at the Young People's Housing Panel.

Early intervention support is critical to reducing the impact of homelessness and rough sleeping on our young people. However, inevitably some young people will present to us as homeless. Focusing on early intervention will reduce the number who present as homeless, but we need to respond to these cases creatively and sensitively to each individual situation. Therefore, we need to create responsive and adaptable solutions, combined with an increase in the range of accommodation placements, to improve our ability to respond to homelessness presentations.

To support our response to homelessness, there will be cases when additional support is required. To this end, we have successfully applied for funding to deliver the Single Homelessness Accommodation Programme (SHAP) outlined in Case Study 2. This is a significant step towards increasing our accommodation options for our most vulnerable young people who need intensive interventionist support to avoid rough sleeping and increase their tenancy sustainment. However, we will continue to monitor external grant opportunities to provide additional accommodation and support options. Furthermore, we will also lobby government to provide additional funding to increase our options when assisting young people in the most challenging circumstances. This will be completed in partnership with other local authorities who are experiencing similar pressures to strengthen the call for additional funding opportunities.

#### **Case Study 2 – Single Homelessness Accommodation Programme (SHAP)**

The Council has been awarded capital and revenue funding to deliver this programme aimed at assisting 18–25-year-olds at risk of homelessness. Homes England and the Department for Levelling Up, Homes and Communities (DLUHC) co-produced this funding application which will increase the Council's housing stock by 4 x 1-bed apartments and provide Housing First support for 3 years through our partner agency Two Saints. The Council and Two Saint's successful delivery and implementation of the Next Steps Accommodation Programme (NSAP) with a 100% tenancy sustainment, 25% above target, and the learning gained from the delivery of this programme will feed into our delivery of SHAP. This will add a further option for our allocations team for our most vulnerable young people who have proven difficulties with tenancy sustainment in our SiLs, temporary accommodation and move-on placements. By providing bespoke and high-intensive support, as well as an accommodation first approach, we will be able to produce better outcomes for our most vulnerable young people.

**In the next 4 years, we aim to:**

- Complete the successful implementation and evaluation of the Single Homelessness Accommodation Programme with an aim for a 75% tenancy sustainment rate.
- Continue to monitor and apply for grant funding opportunities to provide interventionist support for young people at risk of homelessness.
- Undertake an annual cross-service 'snapshot' to identify young people aged 14+ who are most at risk of homelessness at 16/17.
- Ensure that early intervention is prioritised at the earliest stage we are aware of a young person who is at risk of homelessness.
- Continue to focus on the prevention of homelessness and find creative solutions to prevent and reduce homelessness approaches.
- Lobby government in partnership with partner Local Authorities for more funding and support to empower the Council's ability to fulfil its Corporate Parenting Duty.

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## Monitoring and Evaluation

Progress against the objectives, actions and strategic priorities outlined in the Young People's Housing Strategy will be assessed and held accountable through a combination of different forums and groups to ensure successful outcomes. This includes evaluation at the Young People's Housing Panel with representatives from Children Services and Housing, the Tenant Landlord Improvement Panel, and the Housing Advisory and Implementation Group (HAIG) which is a cross-party forum of councillors designed to provide insight to our housing strategies.

Furthermore, an action plan has been developed alongside this strategy. This action plan will be a live document which will be subject to quarterly review to ensure those who have committed to actions are being held accountable to the timeframes and objectives outlined herein. This will ensure that the strategy continues to evolve over the next 4 years and remains relevant, responsive, and up to date.

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## Next Steps

This strategy will run for 4 years up to 2028 when a full evaluation and review will be undertaken of the impacts, successes, and limitations of our recommendations. Every year, an action plan review will be undertaken to assess progress against each of the above objectives co-produced with our residents, young people, and external partners.

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## Equality Impact Assessment (EqIA) form: the initial impact assessment

### 1. Process and guidance

The purpose of an EqIA is to make sure that the council is meeting the needs of all our residents by ensuring we consider how different groups of people may be affected by or experience a proposal in different ways. EqIAs help us to meet our [Public Sector Equality Duty](#) and where applicable the [Armed Forces Duty](#)

The council has a two stage EqIA process:

- Stage 1 - the initial impact assessment
- Stage 2 - the full impact assessment.

This form is for use at Stage 1 of the process. This must be completed when undertaking a project, policy change, or service change. It can form part of a business case for change and must be completed and attached to a Project Initiation Document. The findings of the initial impact assessment will determine whether a full impact assessment is needed.

Guidance and tools for council officers can be accessed on the council's Tackling Inequality Together intranet pages.

Date started:	16.10.2023	
Completed by:	Sam Watt	
Service:	Strategic Housing / Economy and Housing	
Project or policy EqIA relates to:	Young People's Housing Strategy	
Date EqIA discussed at service team meeting:	18.10.2023	

Conclusion (is a full assessment needed?):	No.	
Signed off by (AD):	Rhian Hayes Assistant Director, Economy & Housing	<i>Rhian Hayes</i>
Sign off date:	13/12/2023	

## 2. Summary of the policy, project, or service

This section should be used to summarise the project, policy, or service change (the proposal).

### What is the purpose of the proposal, what are the aims and expected outcomes, and how does it relate to service plans and the corporate plan?

This strategy will cover housing options and pathways for the Council's priority groups of those aged 25 or under. This includes Care Leavers, 16/17 year-olds at risk of homelessness and Unaccompanied Asylum Seeking Children. The strategy will set out the strategic direction of the Council from 2024-2028, ensuring the Council meets its Corporate Parenting Duties and adheres to relevant legislation and best practise. The strategy will be accompanied by a 4-year action plan which sets out the actions the Council will undertake to achieve these objectives in more detail.

### How will the proposal be delivered, what governance arrangements are in place and who are the key internal stakeholders?

Strategy to be adopted in April 2024 following standard Council Executive governance procedures. Prior, the strategy is being aired at the Tenancy and Landlord Improvement Panel, Housing Advisory and Implementation Group, Children Services Leadership Team, Place and Growth Leadership Team and Public Consultation.

Key internal stakeholders are Housing and Children Services.



**Who will be affected by the proposal? Think about who it is aimed at and who will deliver it.**

The strategy is aimed at the Council's priority groups of those aged 25 or under. This includes Care Leavers, 16/17 year-olds at risk of homelessness and Unaccompanied Asylum Seeking Children

### 3. Data & Protected Characteristics

This section should be used to set out what data you have gathered to support the initial impact assessment.

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The table below sets out the equality groups that need to be considered in the impact assessment. These comprise the nine protected characteristics set out in the Equality Act 2010 and other priority areas defined by the council.

Age	Disability	Gender reassignment	Marriage and Civil Partnership	Pregnancy/Maternity
Religious belief	Race	Sex	Sexual Orientation	Socio-economic disadvantage

The Armed Forces Act 2021 also requires consideration of the [impact on Armed Forces Communities](#) when exercising certain housing, education or healthcare functions (excluding social care). Further guidance can be found [here](#).

**What data and information will be used to help assess the impact of the proposal on different groups of people? A list of useful resources is available for officers on the Council's Tackling Inequality Together intranet pages.**

Strategic commissioning data from Children Services showing anticipated pathways of the Council’s priority groups was used to identify those who the strategy prioritises and, in turn, who will be most affected.

#### 4. Assessing & Scoring Impact

This section should be used to assess the likely impact on each equality group, consider how significant any impacts could be and explain how the data gathered supports the conclusions made.

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Scoring impact for equality groups	
Positive impact	The proposal promotes equality of opportunity by meeting needs or addressing existing barriers to participation and/or promotes good community relations
Neutral or no impact	The proposal has no impact or no disproportionate impact.
Low negative	The proposal is likely to negatively impact a small number of people, be of short duration and can easily be resolved.
High negative	The proposal is likely to have a significant negative impact on many people or a severe impact on a smaller number of people.

**Referring to the Scoring table above, please give an impact score for each group, explain what the likely impact will be, and briefly set out how the data supports this conclusion.**

Equality group	Impact score	Impact and supporting data
Age	Positive	This strategy is aimed at the Council’s most vulnerable young people, aged 16-25. By prioritising clear housing pathways and options for these residents they will be positively affected by this strategy. The Council’s strategic needs data currently shows that there are 119 residents this strategy will benefit rising to 169 by 2026/27/
Disability	Positive	There is limited quantitative data on the number of young people within the priority groups outlined in this strategy that have a disability. Quantitative data from our housing officers suggests that a higher proportion of Care Leavers have complex mental health needs related to their trauma. For example, a young person who has experienced more than 3 Adverse Childhood Experiences (ACEs) is much more likely to experience rough sleeping and have more complex mental health needs.
Gender reassignment	Neutral	
Marriage and Civil Partnership	Neutral	
Pregnancy/Maternity	Neutral	
Religious belief	Positive	<p>The Council is expecting to have 70 Unaccompanied Asylum Seeking Children Care Leavers by 2026/27, up from 38 currently. These residents are predominantly from Afghanistan (37%) Sudan (21%) and Iran (16%) with Iraq, Syria and Eritrea (5% each) making up a significant portion.</p> <p>These countries have varied religious beliefs, different to the predominant religion in England, and so will benefit from a strategy that has identified this cohort as a priority group.</p>
Race	Positive	The Council is expecting to have 70 Unaccompanied Asylum Seeking Children Care Leavers by 2026/27, up from 38 currently. These residents are predominantly from Afghanistan (37%) Sudan (21%) and Iran (16%) with Iraq, Syria and Eritrea (5% each) making up a significant portion.

		People from these countries are from a variety of races, different to the predominant one in England, and so will benefit from a strategy that has identified this cohort as a priority group.
Sex	Neutral	
Sexual Orientation	Neutral	
Socio-economic disadvantage	Positive	Quantitative data from our Housing Officers suggests that the priority groups this strategy will put a strategic direction in place for have previously experienced a level of trauma or financial hardship which has led to the Council adopting a Corporate Parenting responsibility for them. This includes family and friends no longer willing to accommodate or other factors that place additional challenges on their ability to enter the housing market. Additional support is usually required for challenging behaviours also.
Armed Forces Communities	Neutral	

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## 5. Conclusion and next steps.

Based on your findings from your initial impact assessment, you must complete a full impact assessment if you have identified any groups as having a low or high negative impact.

If no impact, or a positive impact has been identified, you do not need to complete a full assessment. However, you must include reference to the initial assessment in any associated reports, and it must receive formal approval from the Assistant Director responsible for the project, policy, or service change.

<b>TITLE</b>	<b>Building Control Partnership</b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	(All Wards);
<b>LEAD OFFICER</b>	Director, Place and Growth - Giorgio Framallicco
<b>LEAD MEMBER</b>	Executive Member for Planning and Local Plan - Lindsay Ferris

## **PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

To agree the principle of entering a new shared service agreement and continuation of the existing partnership with West Berkshire Council to deliver the building control functions, ensuring that the service is delivered on a cost recovery basis to meet the statutory obligations of the Council.

## **RECOMMENDATION**

That Executive approves the Council entering into new shared service agreement for building control services under Section 101 of the Local Government Act 1972 with West Berkshire Council to come into effect from 1st April 2024.

That delegated authority be given to the Director of Place & Growth to finalise and sign the new agreement in consultation with the Executive Member for Planning and Local Plan.

## **EXECUTIVE SUMMARY**

Building Control Solutions (BCS) was originally established in April 2015, as a two-way shared service with the Royal Borough of Windsor & Maidenhead (RBWM) to deliver the building control function across those two authorities.

In July 2016 West Berkshire District Council (WBDC) joined the shared service, under a new agreement. In September 2019, RBWM announced its intention to leave the shared service on the expiry of the original agreement. Since that time, BCS has continued to operate the shared service with WBDC based on the established principles of the agreement which formally expired in June 2021, whilst officers investigated options for moving forward.

Wokingham Borough Council are the host authority for the shared service with staff transferring under the TUPE process to WBC.

Following a peer review and discussions with West Berkshire Council, it has been agreed to enter into a new shared service agreement with them under Section 101 of the Local Government Act 1972 for a period of 5 years commencing on 1st April 2024.

Reports recommending support for each of the partners to enter into a new agreement for continued deliver of a shared building control service are being presented to the Executives of Wokingham Borough and West Berkshire Councils respectively, during March 2024.

## BACKGROUND

Building Control Solutions (BCS) was originally established in April 2015, as a two-way shared service with the Royal Borough of Windsor & Maidenhead (RBWM) to deliver the building control function across those two authorities.

In July 2016 West Berkshire District Council (WBDC) joined the shared service, under a new agreement. In September 2019, RBWM announced its intention to leave the shared service on the expiry of the original agreement. Since that time, BCS has continued to operate the shared service with WBDC based on the established principles of the agreement which formally expired in June 2021, whilst officers investigated options for moving forward.

The original agreement for the shared service was made under Section 101 of the Local Government Act 1972 and ran for a five-year period. Wokingham Borough Council are the host authority for the shared service with staff transferring under the TUPE process to WBC.

Whilst officers considered renewal of the agreement with West Berkshire Council, Reading Borough Council approached the shared service in April 2022 with a request to consider joining the partnership. It was agreed by the three authorities lead officers that it would be advantageous to undertake a peer review of both services with a view to considering available options.

LABC (Local Authority Building Control) the national body representing all local authority building control teams was engaged to undertake a peer review of both the Building Control Solutions team and Reading Borough Council team and consider a case for business change. Terms of Reference for the peer review were drawn up and agreed by all parties.

LABC completed this work and produced two reports on the existing BCS service and a case for business change (background documents). These have been presented to both authorities lead officers for their consideration.

A third report was written and presented to Reading Borough Council by LABC.

Following lengthy discussions with West Berkshire Council, it has been agreed to enter into a new shared service agreement with them under Section 101 of the Local Government Act 1972 for a period of 5 years commencing on 1st April 2024.

The shared service agreement between WBC, West Berks and RBWM was made under Section 101 of the Local Government Act 1972 and expired on 30th June 2021. RBWM withdrew from the shared service on its expiry. Since July 2021, WBC has continued to provide the service on behalf of West Berkshire based on the original agreement.

The Building Control service operates primarily within two main activity areas, trading, and non-trading:

- The trading activity is a statutory one assessing development proposals against the Building Regulations. All applications are subject to fees and charges, and the trading activity must be implemented on a legally self-financing basis. This

element of the business currently accounts for about 83% of the total service output.

- The non-trading is also a statutory activity and relates to the application of the Building Act and includes work to make safe dangerous structures, the consideration of demolitions, Competent Person Schemes and Approved Inspector Registers along with other activities which are statutory but cannot be charged for which currently accounts for the other 17% of the service.

## **BUSINESS CASE**

The local authority building control service is in direct competition with private sector building control bodies (Approved Inspectors) offering similar services. Maintaining a sufficient market share to retain its self-financing status as well as the ongoing difficulty with the recruitment and retention of staff makes the operation of small, single authority teams difficult. The primary benefit of a shared service is that it helps to safeguard the future resilience of the statutory service by maintaining the skill and capacity of the team to discharge all its statutory requirements. A larger team also has a stronger basis from which to maintain market share, in an increasingly competitive market.

The formation of the shared service in 2015 delivered savings to each partner authority regarding management posts through the creation of one team with a single Building Control Manager post and a single Support Team Manager post.

In addition, there continues to be savings from efficiency within the surveying and support teams through economies of scale and efficiency delivered by flexibility within a larger team dealing with workload. This has been hindered by a difficult recruitment and retention market in recent years, but overall, the shared service remains cost-effective with some 83% of costs covered by commercial revenue earned from delivering commercial building control services. In addition, the shared service has managed to build up a small, ring-fenced reserve to help with business improvement and managing ongoing income fluctuation. The non-trading activities account for 17% and are apportioned appropriately to each Council based on workload. The benefits of the arrangements are equally shared in respect of service lead and support management costs.

The shared service since its inception in 2015 has regularly delivered a self-financing service on a consistent annual basis achieving small surpluses where possible. These surpluses have accumulated into a BC Reserve currently standing at £92k. In addition to this figure, it should also be acknowledged that the service has delivered a comprehensive Transformation Project including a new single IT system across the partnership along with its hardware at no-cost to the partner authorities. The cost of this project was also financed fully by the Building Control Reserve.

The BCS shared service has developed itself well into a single team since its inception and all staff operate flexibly across the two authority areas. The shared service also continues to operate a successful Quality Management System, which is externally audited to ISO:9001 standard every year.



The LABC service review concluded that the shared service was operating well and was well-regarded.

Since its inception, the shared service has implemented a commitment to continuous business improvement, has implemented a single IT system across the partnership allowing mobile working and continues to identify both business opportunities to maintain market share along with customer service improvements.

In its review findings, LABC reflected and commented “Mystery shopping exercises showed a good level of customer service across both the support and surveying teams. This is encouraging and will continue to be built up in response to the intensive competitive environment that the service operates within”.

Increased local competition for experienced building surveyors locally has unfortunately resulted in several experienced team members leaving the shared service for increased salary and benefits in the past few years as well as taking valuable business contacts with them. The LABC review acknowledged this however, despite the intense competition for skilled resource and the effects of the ‘cost of living’ crisis, the service has increased its market share from 48% to 52% during 2023 with an increased focus on marketing. It aims to maintain this success during 2024.

In recognition of the staff recruitment and retention difficulties, the service has maintained an ongoing commitment to ‘grow its own’ with a training commitment through apprenticeships, staff development and securing government funding for a Trainee Building Control Surveyor post. It is hoped that the shared service will secure the opportunity for a further trainee through government funding for 2024. This commitment will remain moving forward; along with the training commitment to maintain the Registered Building Inspector status for all our surveyors.

The strong effort made by the shared service to prepare for the incoming changes resulting from implementation of the Building Safety Act in April 2024 were also recognised by the LABC Review.

The success of the shared service in service delivery was similarly recognised by the LABC Review noting that “BCS is delivering a good service for the partner authorities, performing well compared to other local authority services, whilst its processes and procedures are good” and helpfully advising that some further work on branding may be advantageous and its governance and identity as a local authority service could be sharpened.

In conclusion, the LABC team indicated their opinion that the shared service delivered by BCS was a top-quartile performing service nationally.

In this context, the LABC Review highlights a strong basis for continued delivery of the shared service.

Several of the recommendations and opportunities for improvement highlighted in the LABC review have already been implemented and addressed; whilst others will be addressed over the coming months once the long-term future of the service is secured through a new agreement.

Following the conclusion of the LABC Peer Review, the Case for Business Change undertaken by LABC considered several aspects within its terms of reference: -

- Future operating models, including the continuation of the current shared service model under the Local Government Act 1972 or other models that may be appropriate and associated governance structures.
- Financial and operational viability of extending the shared service into a three-way service with Reading Borough Council.
- Branding and positioning.
- Recommendations on next steps

The Case for Business Change identified several key findings: -

- The current governance model is considered acceptable, but the current arrangements need to be reinvigorated to ensure both parties feel fully invested in the partnership.
- It was not possible to provide an opinion on the financial viability of a three-way shared service to include Reading because of the lack of financial data from Reading.
- While increasing the number of authorities included in the partnership would usually be considered a sensible approach, to increase capacity and resilience. The situation at Reading in terms of establishment staff means this would not currently be the case and the associated agency costs could adversely impact on financial viability of the existing shared service.
- Branding is not considered a significant issue; however, it is recommended that further work is done around clear messaging that BCS is a local authority building control partnership.
- The balance between commerciality and public protection should continue to be kept under review to ensure all parties involved in the partnership are happy with how the service positions itself.
- In the short term the costs to include Reading in the partnership may well outweigh the benefits, however a future merger should not be dismissed.
- To support Reading, it is suggested guidance and advice could be provided on an on-going basis, in conjunction with undertaking further work on extending the partnership to include Reading, providing Reading commits to the process.

Since the LABC Peer Review and Case for Business Change processes were completed in 2023, Reading has decided to remain as a single service for the foreseeable future, with its service continuing to rely heavily on agency staff. Contact will be maintained with Reading to see if future opportunity may arise to review their position and the expansion of the partnership.

Discussions have continued with officers at West Berkshire Council over the last year and agreement has been reached in principle to maintain the existing partnership with a new shared service agreement put in place from 1st April 2024.

It has been agreed that this period will be for a further five years with an opportunity for either partner to give adequate notice of no-fault termination of the agreement. This period will provide a secure future for the shared service and the ability to prepare a longer-term business plan. The proposed agreement will also allow for the possibility of an extension period. A review would be undertaken before the initial agreement expired. This review would decide if the partnership was working well or whether it is best for

WBC to consider further options. Legal advisers Bevan Brittan have been engaged to develop the draft agreement on behalf of both authorities with input from both legal services teams. This work is continuing to take place to meet the 1<sup>st</sup> April deadline.

Significant changes come into effect from April 2024 with the implementation of the Building Safety Act and the introduction of the Building Safety Regulator's powers requiring all practising Building Control Surveyors to become Registered Building Inspectors. The implications of these changes require Building Control services operating as a shared service to formalise their arrangements through an agreement under the Local Government Act 1972 by 1<sup>st</sup> April 2024.

It is intended that this work will be completed and signed off by both legal teams in time for the new agreement to be signed by both authorities and to take effect from 1st April 2024.

The key principles of the new agreement will be based upon the main principles in the original agreement, but noting the findings of the LABC Peer Review, will ensure:

- An improvement in governance and reporting to the two shared service partners monthly.
- Clarity on the calculation of respective partner contributions to the non-trading account.
- Clarity of partners' internal re-charging arrangements to the shared service budget.
- Finance lead officer roles are designated within both partner authorities.

Once the agreement is in place, it is the intention of the service to fully consider any new business opportunities resulting to the eventual changes brought in by the Building Safety Act. The Building Safety Regulator's view of the future role of Building Control is one of enforcement activity, which may limit opportunities to offer additional services, but this will be considered in due course.

Long-term service planning will focus on continuing to deliver an upturn in market share whilst also developing staffing skillsets to offer additional services to our customers where opportunity allows.

## **FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	£0		Revenue
Next Financial Year (Year 2)	£0		Revenue
Following Financial Year (Year 3)	£0		Revenue

### **Other Financial Information**

Much of this arrangement (83%) operates under a ringfence that means all income and expenditure remain within the ringfence and don't have any financial impact on either authority in the partnership. This includes an allocation of corporate recharges from both authorities and all other costs associated with operating the service are included and recovered. These costs are to be reviewed on an ongoing basis under the new arrangement to ensure that they reflect the true cost of providing the service.

There is a legal requirement for the ringfence element of the service to operate on a cost neutral basis. This means that if costs increase income will also need to increase to cover these costs with any yearend variances passed through the Building Control reserve.

It is possible that a one-off additional cost, such as a purchase of new software may exceed the available funds in the reserve. In this case the two authorities may need to provide financial assistance although the aim would be to recover the outlay through the ringfence by setting an income budget that exceed expenditure for future years to recover such costs.

The other 17% is predominantly funded by the two councils in the partnership, currently split one third WBDC and two thirds WBC based on the level of income generated through the arrangement. This split will need to be agreed as well as the overall split of workload in the new arrangement. This will be relevant to the allocation of one-off costs if the individual councils had to contribute additional funds and the allocation of any reserves at the end of the agreement. The same principle applies in the current arrangement.

If the joint arrangement were to end and WBC operate the service on its own the same principle of the ringfence would apply. The cost of operating the service outside of the shared service has however not been calculated.

The building control service in its entirety is budgeted to cost WBC £160k in 2023/24 reducing to £150k in 2024/25 due to a reduction in staff numbers. The new arrangement is not expected to have any significant impact on this unless the split of the agreement mentioned above is significantly different to the current arrangement.

Risks exist around the service failing to generate sufficient income to cover the cost of the service. If this were to happen charges would need to be increased or costs reviewed to bring income and expenditure back in line with one another. This risk exists under the current arrangement and will be no different under the new one. A similar risk would remain should the service operate as a single service.

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<b>Legal Implications arising from the Recommendation(s)</b>
None

<b>Stakeholder Considerations and Consultation</b>
None

<b>Public Sector Equality Duty</b>
Not relevant

<b>Climate Emergency – <i>This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030</i></b>
Continued ability of the service to secure national building control sustainability requirement on a cost neutral basis.

<b>Reasons for considering the report in Closed Session</b>

<b>List of Background Papers</b>
LABC Consultative Peer Review Report – October 2022 and LABC Business Case Change Report – April 2023

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# LABC Business Case Change Report

BC Solutions & Reading Building Control

April 2023

A geometric diagram consisting of a vertical line, a horizontal line, and a diagonal line forming a right-angled triangle. An arc indicates an angle of 38 degrees between the vertical and diagonal lines.

38°

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# A. Executive Summary

## A.1 Report overview

LABC were invited by BC Solutions (BCS) - (which is a two-way shared service between West Berkshire Council and Wokingham Borough Council) and Reading Borough Council to review and comment on the potential for the existing two-way shared service to be extended to include Reading Borough Council's Building Control service.

The report is based on the information gathered during the service reviews on BC Solutions and Reading's building control services.

The report considers:

- Future operating models, including the continuation of the current shared service model under the Local Government Act 1972 or other models that may be appropriate and associated governance structures.
- Financial and operational viability of a three-way service with Reading Borough Council.
- Branding and positioning.
- Recommendations on next steps

### The key findings are as follows:

- The current governance model is considered acceptable, but the current arrangements need to be reinvigorated to ensure both parties feel invested in the partnership.
- It is not possible to provide an opinion on the financial viability of a three-way shared service to include Reading because of the lack of financial data from Reading.
- While increasing the number of authorities included in the BC Solutions partnership would usually be considered a sensible approach, to increase capacity and resilience, the situation at Reading in terms of establishment staff means this would not currently be the case and the associated agency costs will impact on financial viability.
- Branding of BC Solutions is not considered a significant issue; however it is recommended that further work is done around clear messaging about this local authority partnership.
- BC Solutions should consider the balance between commerciality and public protection and ensure all parties involved in the partnership are happy with how the service positions itself.
- In the short term the costs to include Reading in the partnership may well outweigh the benefits, however such a merger should continue to be considered.
- To support Reading, it is suggested the BC Solutions Service Manager provides guidance and advice on an on-going basis, in conjunction with undertaking further work on extending the partnership to include Reading, providing Reading commits to the process.



# B. Background on LABC

## B.1 Member organisation

LABC is the member organisation representing all local authority building control departments in England and Wales with around 3,500 professional surveyors and technical support staff.

LABC members nationwide deal with around 67% of all building control applications across all sectors of the built environment: domestic extensions, conversions and improvements; new homes and apartments; commercial new-build and conversions (offices, retail, hospitality, industrial and logistics); education; healthcare; care homes; leisure and entertainment; stadia.

LABC builds awareness of local authority building control amongst the public, developers, designers, and contractors. It also works with government, trade organisations, manufacturers, distributors, research establishments and professional institutions to support competence, standards and safety in building.

## B.2 LABC's key functions for member local authorities are:

- Government policy working with ministry committees; liaison with the Government Departments, the LGA, Fire & Rescue Services, HSE, Trading Standards and Public Protection and OPSS.
- National standards, ISO, performance measures, competencies, and validation programmes
- Learning, qualifications, training programmes, apprenticeships, CPD and specialist knowledge – in recent years LABC has invested well over £2 million to improve standards and learning.
- Successfully obtained grant funding to support training, development and recruitment to the profession.
- Member technical conferences and events
- Research into building control, compliance, and enforcement
- Technical liaison with industry, Competent Persons Schemes, BSI, testing, and certification, etc.
- Technical guidance and publications
- Partner Authority Scheme
- Management and legal opinions for members
- Crisis management support
- Change and transformation in local government.
- National business relationships, brand awareness, website. Apps, portals, social media, and digital outreach
- Local business relationships and roadshows
- Presence at national events like UK Construction Week
- Building Excellence Awards
- Facilitating local authority sharing of structural calculation checks and plan appraisals.

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# C. LABC Consultant

## C.1 Richard Scott – LABC Head of Member Support

Richard Scott contributed to this review by providing a co-ordinated perspective on all facets of service delivery, aiding all aspects of the review, and leading on the preparation of the final report for submission.

Richard is a successful former local authority manager, responsible for Building Control, Local Land Charges and GIS, developing additional income streams and cost saving initiatives.

Richard has over 30 years' experience in the construction industry. Originally from a construction contracting background, Richard has worked also in a private surveying practice, although most of his career has been spent in local authority building control in the East Midlands, where he was responsible for the oversight of many major schemes and co-ordinating council's response to major incidents. An advocate of continuous improvement and delivery of excellent service user provision, Richard is now responsible for providing practical, pragmatic support to local authority building control services considering change and transformation, delivering face-to-face management training, and creating and delivering accredited on-line training for technical support. Richard also delivers the CIOB accredited Level 6 Certificate in Building Control Management - the first cohort commenced in March this year. This together with other accredited learning has resulted in LABC being presented with the "Silver Award" for People Development Programme (Public Sector) at the prestigious Learning Awards 2020.

In a wider capacity, Richard is a former LABC President and Board member, with a focus on human resources.

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# D. The Building Control Service

## D.1 Recognition of the valuable function the building control service provides

Building Control has many strategic facets, the most obvious being that of life safety, others include:

- Energy conservation
- Access
- Consumer protection

The service also supports economic development, creating quality buildings and safeguarding the local built environment.

In addition to the above, building control delivers other emergency functions that are required when dealing with dangerous structures, such instances occur far more frequently than many would assume and include dealing with landslips, flooding, collisions with structures, fires, weather events and civil emergencies.

Those directly involved with Building Control will appreciate the importance of the service. It is vital that decision makers are too, otherwise they are likely to divest themselves to the lowest cost option.

## D.2 The financial context in which the building control service operates

The Building (Local Authority Charges) Regulations 2010 govern how building control services operates, in terms of setting and collecting fees for a specific range of activities (chargeable functions), the overriding objective being to ensure that, as near as possible, the income derived from undertaking the chargeable functions covers the costs associated with providing them. This objective remains the same irrespective of who provides the service and whichever operating model is adopted.

There are numerous statutory functions for which local authorities have responsibility, including the administration of notices received from approved inspectors, administering demolition notices, dealing with works and providing advice on schemes requiring building control oversight which are exempted from the charges regulations.

In addition to the statutory functions, building control teams frequently provide 'free' advice and guidance to colleagues in planning, conservation, asset management, environmental health, housing and others.

The Chartered Institute of Public Finance Accountancy (CIPFA) has published guidance for local authorities, detailing how their building control account should be managed, which naturally aligns with the overriding objective of the charges regulations.

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# E. Service Delivery and Models

## E.1 Factors to consider

There will always be a wide variety of factors to consider when contemplating service delivery model options, and each scenario will be different. The commentary below gives an indication of the typical issues faced.

### E.1.1 People

People's personal interests play a huge part in the decision-making process, this could include local authority senior managers, elected members, or the building control manager – in fact, anyone involved in the process can impact the process. This may well be a delicate issue but one which must not be ignored.

Some will have fears in terms of job security, redundancy, TUPE arrangements while, others may relate to political obstacles, particularly when considering shared service arrangements between local authorities.

### E.1.2 Scale

It may be that some building control services are simply too small to be considered commercially viable. This may be an increasingly important consideration in the coming years when the registration of the profession is in operation under the Building Safety Regulator.

Having a larger scale operation can bring about certain benefits, including:

- Increased service resilience
- Broader range and value of work
- Wider range of skills
- Improved team profile (skills, age and experience)

### E.1.3 Commissioning and Delivery

The delivery of a building control service is a statutory obligation placed upon local authorities, under Section 91 of the Building Act 1984.

Authorities may wish to procure this on behalf of their residents through a service delivery partner, whether that be via an outsource management company, a mutual or a shared service arrangement. If an outsource management company model is proposed, procurement must be undertaken in accordance with current procurement regulations and it should be noted that, while no two contracts will be the same, it is usual that the local authority retain a client-side executive, since only the local authority and its direct employees are able to issue formal notices and take enforcement action.

## **E.2 Service Delivery Models**

Local authority building control teams throughout England and Wales operate under a variety of different service delivery models: the majority remain as individual stand-alone services, many have entered shared service arrangements with other local authorities, a few have set up wholly owned local authority companies or arm's length management organisations or have outsourced the service and there is currently one mutual in existence.

### **E.2.1 Shared Service Working**

This is by far the most common service delivery model after the stand-alone building control service. It has proved to be successful, resulting in improved efficiency, greater consistency of approach and typically positive customer feedback.

There are a broad range of models in place that will be subject to a wide variety of contractual arrangements, tailored to suit the requirements of the authorities concerned. The most basic model is voluntary working between building control teams, some operating under a non-binding memorandum of understanding or service level agreement. Shared service operations exist that either have a shared head of service with separate teams, right through to models which include the full transfer of staff, systems, and finance to either a host or lead authority.

### **E.2.2 Shared Support Agreements**

These agreements facilitate the sharing of staff and resources, often amongst a group of authorities across a geographical region. The aim is to enable authorities to call for support from their neighbours at times of peak demand and to share expertise and specialist knowledge, enabling better utilisation of resources without placing any contractual obligations on any of the authorities to respond to specific requests for support if they feel they cannot accommodate the request.

### **E.2.3 Shared Head of Service**

With this arrangement, two or more local authorities agree to share the cost of a head of service, or building control manager who would divide their time between authorities. It is usual for him/her to remain in the employ of one of the authorities. Direct cost savings for all associated authorities can be achieved with this arrangement and as with shared support arrangements it engenders closer working relationships as well as encouraging commonality of practice; it could also be seen as a precursor to a more integrated approach.

### **E.2.4 Lead Authority**

In this model, all staff are typically employed by the lead authority, and it is this authority that would make all the decisions in respect of the building control service. A consultative group formed from members of the key clients (the other local authorities in the arrangement) would be able to make representations, however they would not have the power to make binding decisions. Having a single entity taking decisions would streamline the process, however the risk of alienating the other authorities in the arrangement remains a key risk which requires careful management.

### **E.2.5 Host Authority**

With this arrangement, building control staff reside within a host authority, which would report periodically to a steering group, formed of representatives from each of the partner authorities, often including key building control personnel. The legal responsibility for the delivery of the building control service remains with each individual authority.

## **E.3 Employment Arrangements**

Understandably employment arrangements typically cause the greatest amount of concern for staff and is therefore one of the main reasons extreme care should be taken when effecting such change and advice should always be sought of HR professionals.

To achieve an overall reduction in operating costs and economies of scale, staff are usually employed by one authority, (the lead authority), and this can be done by transfer or secondment. Secondment may offer a more flexible approach; however many consider it a temporary solution and one that potentially suggests a lack of commitment to the new structure. This perception could become a self-fulfilling prophecy if not managed and communicated effectively. The transfer of staff to the new organisation provides the organisation better opportunities to 'flex' and respond to market conditions, ease management control issues, and help smooth the harmonisation of pay and conditions, which is often another issue which can create difficulties if not managed effectively.

## **E.4 Financial Arrangements**

Under the provisions of the Building (Local Authority Charges) Regulations and associated CIPFA guidance, the majority of building control work should be self-financing, adopting shared service working will help reduce the volatility and uncertainty of income in difficult market conditions. A major 'stumbling block' for shared service arrangements to overcome is the apportionment of costs associated with non-fee earning work and how potential deficits are allocated, transparency is essential if these issues are to be accepted by all parties concerned.

## **E.5 Support Services**

Another area which often causes issues is the loss of support services charges, since typically services such as human resources and finance are provided by the lead/host authority. However, considerable savings can be achieved by selecting the most appropriate providers of services, such as IT and property from any of the partner authorities. In some cases the use of external providers may well prove most cost effective.

## **E.6 Benefits of Integrated Shared Service Working**

Around 36% of local authority building control services are in some form of collaborative or shared service arrangement. Moving to an integrated service can bring about a range of benefits, some of which are outlined below:

- Cost reductions via economies of scale and better utilisation of resources
- Improved customer service, technical consistency, and co-ordination
- Greater focus on marketing with dedicated resources able to be deployed
- Retention and increase in market share
- Business efficiencies through the easing of peaks and troughs in work load
- Greater flexibility to respond to market fluctuations.
- Increased opportunity to offer complimentary services and benefit from additional income.
- More resilient and robust business model
- Improved staff retention, development, and ability to plan for succession
- Reduced 'political' influence on service delivery
- Assurance for surrounding authorities that a quality service will be maintained
- Staff training, CPD and development – even the addition of, or to sustain, technical specialists with additional qualifications, e.g. fire or structural engineering
- Consistency of practice between local authorities

## **E.7 Wholly Owned Local Authority Company (WOC)**

This model usually takes the form of a Special Purpose Vehicle (SPV) and provides far greater freedom and flexibility to operate and trade than in a standard local authority setting, although the local authority retains control and influence over the organisation. As the organisation is wholly owned by the local authority there is no requirement to follow EU procurement guidance and put the service out to tender providing most of the services it provides (at least 80%) are for the local authority under, Teckal Exemption 1. A management board for the WOC is made up of representatives from the local authority and the operating executive.

## E.8 Mutual

Unlike a wholly Owned Company, a mutual is usually owned or at least part owned by its employees and is often referred to as the “John Lewis” model (as it currently stands). The critical difference with this model is that the service is no longer part of the public sector despite the fact it delivers public sector services. To make this model viable it usually requires a sizeable scale of operation. Most small/medium building control services are not sufficiently large and usually adopt either a shared service/joint working model with neighbouring authorities. To provide scale a mutual can be formed with other related services within their own authority such as planning and environmental health.

Some uncertainty amongst staff often exists with this model because it requires the organisation to commit to competing for their founding authorities’ business, typically on a 5/6-year basis.

Mutuals can be established as Community Interest Companies, Companies Limited by Guarantee or Joint Ventures and they can be ‘not for profit’ organisations, social enterprise companies or profit-making organisations. Any model is, however, subject to the Charges Regulations which will apply to any organisation generating income from local authority building control. It should be noted that employee ownership can be a way to generate greater employee engagement and commitment.

A range of benefits have been identified with this model, including:

- Lower rates of absenteeism
- Higher salaries and productivity
- Greater customer satisfaction

## E.9 Outsourcing

Some scepticism and hostility exists towards those who provide an outsource management company for the building control service, due to practices around recruitment of existing local authority staff. Those currently in operation appear to work well according to staff involved and their customers, however there are examples where outsourcing has not been successful, since outsource companies do not necessarily have the same commitment to delivering the building control service with a public service ethos and fail to facilitate co-operation with colleagues and other authorities.

Like mutuals, it is unlikely that an individual building control service would be outsourced as a stand-alone unit: most outsourcing contracts encompass several local authority sections to achieve commercial viability, although increasingly some companies are offering support to individual local authorities on a ‘pay as you go’ contract basis.

There are no fixed rules in terms of how a new operation is set up, managed, or paid for, including joint ventures where risks and benefits are shared. Everything is open to negotiation, although the commercial organisation will of course want recompense for their input and investment across all fee earning and non-fee earning activities.



Most authorities have scaled back their operations in recent times and while some efficiency savings may still be achievable with this model, they will be much harder to achieve without substantial investment. Again, it must be noted ‘profits’ are not allowed to be made from building control fee earning work.

It is understood that this model raises the most concern with staff in relation to terms and conditions: - while TUPE can guarantee these for a specified time it will not provide complete protection forever. Staff should also realise that their terms and conditions may change even if they stay working for their local authority.

Several hybrid arrangements have come from outsourcing, these include:

- **Insourcing** – where either a private or public sector organisation provides support to the in-house team, to provide extra capacity, improve business resilience or provide specialist commercial support.
- **Joint venture** – usually a long-term public/private partnership which includes a range of services. The private company and the council would be shareholders in the organisation and would share rewards and risks. The driver for such an arrangement is usually savings, however this model does allow for a more commercial approach to implement growth. Commercial arrangements and governance are subject to negotiation and fees are typically charged as an annual management fee or on an activity basis.
- **Outsourcing partnership** – a long-term model typically including several services whereby the local authority transfers services to the private sector or mutual provider. Fees are charged on a similar basis to the joint venture model and on the basis that the local authority achieves savings on existing costs, such savings are achieved through investment and commercial business leadership.

## E.10 Provider of Last Resort

Although this may be classed as a ‘model’ of service delivery, essentially it relates to where a local authority retains a small team to deal with all statutory non-fee earning work, such as enforcement, dangerous structures and administering initial notices, as well as the work approved inspectors decline or to deal with those clients who only want to use the services of the local authority.

There is no contractual arrangement between any approved inspector and the local authority, the local authority simply directs potential clients to the approved inspector register.

This may appear to be an attractive financial solution on cursory examination; however this option is likely to cost the local authority more than running the entire service.

The reason being the local authority loses most of their revenue from the more straight-forward “profitable” work but retains the difficult “loss making” projects which the approved inspector chooses not to take on.

The local authority is likely to have a high turnover of staff simply because employees will become frustrated with the lack of challenging and prestigious work which impacts on their ability to maintain technical competency. This will be increasingly important when the professional register opens in October 2023.

The local authority will have no control over the quality of approved inspectors who chose to work in their area, and this could impact on the quality of the built environment.

The impact on surrounding local authorities will also be very damaging. Approved inspectors who have been able to enter the local market, because of one local authorities decision to “shrink” their service, will look to acquire repeat customers who often work across local authority boundaries.

Key adverse effects of this model are the long-term impact on professional standards and practices, surveyor recruitment and retention, as well as a downward spiral in relation to training and competency levels which will directly impact on the built environment, public protection, and safety.

LABC understand this model was once adopted by a local authority and many customers rejected it, stating “if they had wanted to use an approved inspector, they would have appointed one.”

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# F. Legal framework

## F.1 Background

Local authorities are used to adopting new and enterprising delivery structures to maintain and improve service provisions in times of economic pressure. While finances remain an issue with most local authorities the introduction of the new building control regime under the Building Safety Regulator is seen by many as a key driver for change. The current high profile of building safety and the move to ensure stronger enforcement and compliance is leading many local authorities to consider their options, however it is important to understand the legal and practical implications.

Around 64% of local authorities, in England and Wales, operate an in-house building control service which is built into their internal decision-making and delegation processes and is conducted on a cost recovery basis in line with 'overriding objective' in the Charges Regulations.

## F.2 Powers to delegate

There are various ways in which local authorities can delegate functions to other local authorities and staff, depending on the governance structure adopted.

### F.2.1 The service

The most well-known power to delegate is contained within section 101 of the Local Government Act 1972, this provides local authorities a way to arrange for the discharge of their functions, by either:

- Committee, sub-committee, or an officer of the authority, or
- By any other local authority

It should be noted this route can only be used when all local authorities operate under the traditional 'committee' system.

When either or any of the delegating or receiving local authorities operate under 'executive' arrangements, different powers must be used. Section 101 cannot be used because of prohibitions contained in section 101(1A) of the 1972 Act and section 9DA(3)(b) of the Local Government Act 2000.

Where the delegating local authority operates under executive arrangements and the receiving local authority does not, the delegating authority can rely on Regulation 5(2)(b) of the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2012 to make the required delegated functions.

When the delegating authority operates under a committee system, where building control is an executive function, and the receiving authority operates under executive arrangements, Regulation 6 of the 2012 Regulations can be used which allows for a local authority to pass on a non-executive function to the executive of another local authority. Where the delegation is from one executive operating authority to another, Regulation 5(2)(b) of the 2012 Regulations can be used.

All delegations should be made in writing. It is important to be clear about which powers are being used and make sure that the terms of the delegations are clear and that the delegations are made by the correct person(s)/office.

For local authorities operating under executive arrangements, the decision to delegate must be made by either the leader or more generally the cabinet, as the 'person/office with power to make arrangements,' but this will depend on the governance arrangements within the local authorities constitution.

Local authorities operating under the committee system should decide to delegate in the traditional way – either by full council or by a properly constituted committee.

### **F.2.2 The staff**

There are several arrangements that can be made in relation to staff. Section 113 of the 1972 Act provides for the placing of staff of local authorities at the disposal of other local authorities. Such an arrangement should be set out in writing and full consultation with all affected staff should be carried out before such arrangements are made.

Under section 1(1) of the Local Authorities (Goods and Services) Act 1970, local authorities are permitted to sell services to or purchase services from other local authorities and as such, this power can be used by local authorities supplying building control services to other local authorities to re-charge for their costs in providing those services. It should be noted this re-charging arrangement must still be in line with the overriding objective in the Charges Regulations, which is on a no profit/no loss basis.

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# G. Current and Future Model

## G.1 Current Model

At present Building Control Solutions operates the building control service on a 'goodwill' basis between Wokingham Borough Council and West Berkshire District Council because the agreement between parties, set up under section 101 of the Local Government Act 1972 expired on the 30<sup>th</sup> of June 2021.

There appears to have been some reluctance from West Berkshire District Council to renew the contract. One factor may have been the concerns raised after the Royal Borough of Windsor and Maidenhead (RBWM) pulled out of the shared service on the expiry of the original five-year contract period.

A joint board is in place to which the Service Manager reports. It is understood that this board has not operated effectively for some time. The lack of communication with and oversight from the board may have initially been impacted by the pandemic which took hold in March 2020, and it is likely that the departure of the RBWM unsettled the relationship between West Berkshire and Wokingham.

It was noted during the presentation given to BCS on the 2<sup>nd</sup> of February 2023, that West Berkshire are in fact keen to agree new terms but just wish to understand the options going forwards, which is considered perfectly reasonable.

## G.2 Future Model

It is essential that all parties who enter a shared service arrangement feel comfortable and confident that they have all the requisite information needed to satisfy themselves and their respective local authorities that they are receiving a good service and value for money from the 'host' authority.

All local authorities are under pressure to deliver savings or at least justify current budgets, this is a straightforward process for in-house services however when services are shared and hosting costs are involved, it is key for finance sections to work closely to provide comfort to all those concerned that re-charging levels and associated costs are fair, reasonable, and consistently calculated.

Section E outlines some of the delivery models adopted across building control services in England and highlights aspects requiring consideration; Section F gives commentary on the legislation in place to facilitate shared service arrangements.

It will be for the parties involved to determine the best option for their respective service, however there is nothing to suggest that the current arrangements are not satisfactory.

A balance needs to be made between establishing commitment between those entering a shared service, providing the requisite level of flexibility and control, and ensuring all parties are furnished with adequate information to ensure they all feel invested.

Some may consider the establishment of a section 101 agreement, together with the associated transfer of staff under TUPE to be off-putting, however the transfer of the service to another local authority does demonstrate a long-term commitment which prospective employees are likely to consider important. There will inevitably be concerns and potential anxiety for the staff being transferred, but this can be mitigated by effective communications throughout the process.

Sharing staff under the provisions of a section 113 agreement, has its merits in that it would provide flexibility for the authorities involved, however some may perceive such an arrangement to be a more short-term option. Given that BC Solutions is already set-up under a section 101 agreement, moving to an agreement under section 113 would likely be viewed as a retrograde step by Wokingham and the existing employees alike, which in turn could unsettle the team and potentially lead to further staff losses.

It is suggested that unless there is a real desire, justification and support from both parties to move to a different governance model, the existing arrangements should be maintained and procedures and reporting revitalised, to ensure any concerns which exist are suitably addressed.

# H. Financial Viability

## H.1 Financial Position at BC Solutions

BC Solutions has seen a steady decline in market share over the past three years, from 60% in 2019/20 to 54% in 2021/22. This loss of market share has understandably impacted on income levels, with a significant decrease in income of around 32%, from £1,600,534 in 2019/20 to £1,085,826 in 2021/22.

**Table 1. Building Control Chargeable Fee Earning Account – BC Solutions**

Year	Building Reg apps	Initial Notices received	Market share %	Employee costs £	Central Support Service Charges £	Income £	Total service expenditure £
2019/20	2371	1611	60	1,252,468	244,312	1,611,534	1,622,244
2020/21	1958	1760	53	1,098,715	212,666	1,381,175	1,449,777
2021/22	2006	1721	54	831,469	154,500	1,085,826	1,071,714

Based on average outturn figures over the past three years, each surveyor generated around £153,000, which is considered high when compared to other services recently surveyed. It was noted that applications per surveyor were also high when compared to others.

During the period 2019 – 2022, employee costs have reduced (because of lower establishment numbers) which will have lessened the impact the loss of income would have had on the trading account, however reserves have been diminishing and currently stand at around £72,000.

There have been issues with debt recovery over several years and it is understood there remains a large amount of outstanding debt. It is not clear how BC Solutions, in conjunction with West Berkshire and Wokingham councils intend to deal with this debt, if surpluses are used it is likely this could wipe out the existing reserve.

While the Service Manager has a good handle on the building control accounts concerns have been raised over the level of service charges. While these have reduced over the past three years, it is understood these are to be reviewed to ensure BC Solutions is only paying for what it receives.

## H.2 Financial Position at Reading

During the time of the review Reading's finance section were planning to move from their existing Oracle Fusion system to E5 Advance with the main reason for the migration of systems being to enable better account management.

**Table 2. Building Control Chargeable Fee Earning Account – Reading**

Year	Building Reg apps	Initial Notices received	Market share %	Employee costs £	Central Support Service Charges £	Income £	Total service expenditure £
2019/20	430	374	54	530,664*	25,210*	425,601*	497,163*
2020/21	371	339	53	375,131*	3,749*	240,921*	355,847*
2021/22	350	477	42	419,034*	26,895*	318,772*	414,747*

Reading have seen a reduction in market share of 12% over the past three years, with a subsequent decrease in income of 21% to £419,034 in 2021/22.

While good budgetary controls are in place at Reading, the Assistant Director did question the accuracy of information that would be gathered during the review, and this proved to be the case.

Several queries were raised in relation to employee costs, central support service charges and overall expenditure, for example it is unclear how employee costs can be more than total service expenditure. The review recommended a full review of all financial aspects of the trading and non-trading account.

It is not known if Reading's building control service operates on a cost-recovery basis although the reliance on agency staff and the subsequent higher level of associated 'employee' costs may make this unlikely.

## H.3 Financial Viability of Three-Way Shared Service with Reading

It is not possible to provide a definitive position on the financial viability of Reading joining BC Solutions simply because we do not have sufficient financial data.

BC Solutions is currently managing well, although there are pressures with resourcing and concerns over diminishing market share and debt recovery and how this might impact on reserves which need to be addressed.

Reading's building control service is operating with a heavy reliance on agency staff which would add to the pressures of operating on a cost recovery basis should they join the shared service. It is unlikely this heavy reliance on agency staff would be considered financially sustainable going forward although it may be unavoidable in the short term simply because of difficulties likely to be faced recruiting to a new structure.



A query was raised over the support service recharges levied on the building control service at Reading. This would have to be discussed and agreed with Reading, to determine a reasonable charge payable by Reading for BC Solutions hosting the service.

Prior to any decision being taken on Reading joining BC Solutions a full review of all financial matters relating to the building control service would need to be undertaken. This would also be impacted on any potential change in the governance arrangements and how staff transfers are dealt with.

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# I. Operational Viability

## I.1 Operational Position at BC Solutions

At the time of the review BC Solutions staff were performing very well; productivity levels were high in comparison to several authorities recently surveyed, with each surveyor dealing with around 210 applications per year.

Staff are under pressure and feeling the strain, which suggests they may in fact be being pressed a little too hard. The Service Manager is aware of the situation and has brought in agency staff to support the provision of site inspections and plan appraisals. It is understood a senior member of the team left the authority in recent months which will no doubt have only added to the strain already being experienced by the team.

The Service Manager has attempted to recruit experienced staff on several occasions with little success and is aware 'growing your own' is the best option in the current employment market, although this takes greater time and resources. To this end he has supported staff with housing and structural engineering backgrounds through their LABC CIOB Level 5 diplomas and has also taken on one of the LABC SR21 trainees. This is really encouraging and the right thing to do, but it does place additional burden on the team.

To support growth a new Business and Marketing Manager role has been created and it is understood that the Service Manager is currently reviewing the general staffing structure.

## I.2 Operational Position at Reading

At the time of the review, Reading was operating with 3no. permanent technical support staff and 4no. surveying staff employed through an agency.

The agency staff are ex-local authority surveyors with many years' experience, and they cover all day-to-day site inspections and plan checking work. One agency contractor provides dangerous structure out-of-hours callout cover. Based on establishment numbers and current staffing levels the team may be operating at or near capacity, however this would need to be considered in context for the area.

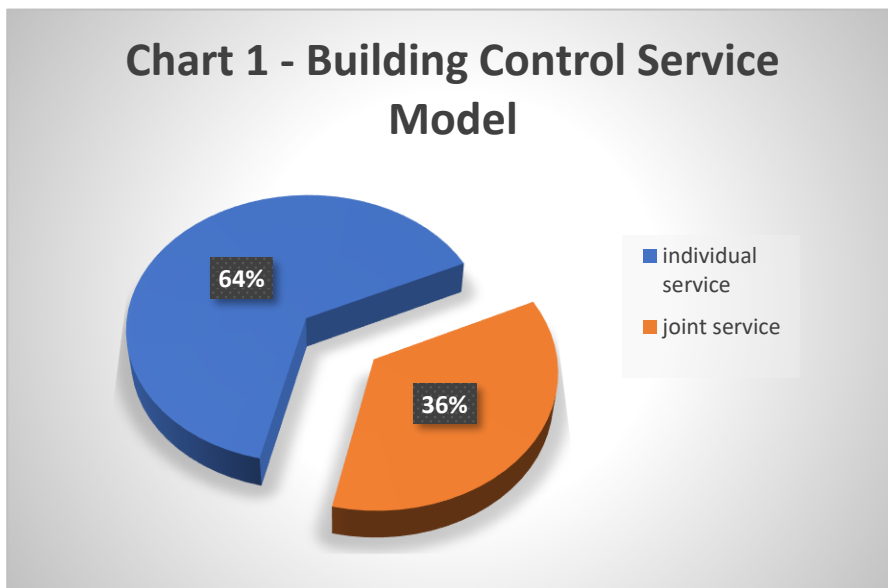
The service has suffered from a lack of management oversight and focus in the past, however the new Development Manager has, in conjunction with a new member of the technical support team started to make service and process improvements, which they are keen to sustain and further develop.

### I.3 Operational Viability of a Three-Way Shared Service

Increasingly individual building control sections are struggling to maintain service delivery levels, especially smaller teams who simply do not have the resilience to cope with even small reductions in resourcing levels (including during periods of annual leave, sickness absence, etc). This is evident with BC Solutions and Reading and so it is unsurprising that more building control services are considering some form of collaboration to improve their capacity to cope.

At present around 36% of all building control teams operate within some form of joint service arrangement and this is likely to increase in the coming years.

**Chart 1. Building Control Service Model**



Ordinarily increasing the number of services within a shared service arrangement would provide positive results, in terms of capacity, resilience, broader levels of competence, access to a wider and potentially more interesting range of work, etc.

While this may well partly be the case were Reading to join BC Solutions, there are several factors which should be considered, the two main operational issues are outlined below.

### **I.3.1 Resourcing**

Both teams are struggling with resourcing at present, neither has been able to recruit to full establishment despite their best efforts.

Bringing Reading into the shared service at present would provide additional technical support, which may be welcome following the recent re-structure at BC Solutions, however the fact Reading has no surveyors on the permanent establishment means there would be no one to transfer across. The agency surveyors may choose not to work for the shared service, and this would only end up adding to the pressures currently being felt by the surveying team at BC Solutions.

We know morale is not currently generally good with the team at BC Solutions and mixed in Reading. There is therefore the potential for morale to be adversely impacted were Reading to join the partnership without there being an increase in surveying resources and it could even lead to further staff leaving. This is a real risk which should be carefully considered.

### **I.3.2 IT Systems**

BC Solutions operate a Tascomi/iDox Cloud internet-based software as its single IT system for both its data and document management system, whereas Reading work using a Civica back-office and document management system.

While it is possible for shared services to operate different back-office systems, this typically requires some 'workarounds' to ensure all parties can access data and produce performance reports. Further will be required by all building control teams to ensure their systems are set up to gather and submit new key performance indicators for the Building Safety Regulator, under the new building control regime.

Ideally the shared service would operate using the same back-office system and this would require the migration of data to the chosen system.

BC Solutions migrated data from West Berkshire and Wokingham council's as part of their integration process and so the Service Manager will be aware of the hard work required to complete such a project.

The migration to a single system, likely the Tascomi/iDOX system currently operated by BC Solutions would take in the region of 6 – 9 months. This work could be done after any proposed move to the shared service, although ideally it would take place before.

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# J. Branding and Positioning

## J.1 Branding

BC Solutions undertook a market research and branding exercise prior to deciding on the BC Solutions branding and details were agreed by those local authorities involved with the partnership at the time it was established.

The issue of branding was raised during the stakeholder interview process of the BC Solutions review. There appeared to be some who considered the current branding does not align itself with a local authority building control service.

Some of the surveyors relayed stories where their clients had presumed they were an Approved Inspector company and as such they had to explain they were in fact a local authority shared service, so there is clearly some ambiguity, despite the fact West Berkshire and Wokingham council's branding is on the BC Solutions web site.

Reviewing all branded material is recommended, including the website, and making any necessary changes to ensure the status of BC Solutions and its relationship with the local authorities is clear.

We would not necessarily suggest a re-branding exercise at this time, however, should Reading join the shared service partnership, this would provide an ideal opportunity to do so.

## J.2 Positioning

Following the introduction of competition into the building control market there was a shift towards local authority building control teams operating on a more commercial basis.

Many building control teams expanded their services to undertake other elements of work outside, but aligned with core building control functions, such as air-pressure and sound testing, SAP and SBEM calculations, as well as fire risk assessments. This trend was supported by LABC, as a way of helping building control teams generate additional income to safeguard their core service.

In recent times, and despite the continued financial pressures local authorities are experiencing, building control teams have tended to focus more on their core functions. This move has no doubt been driven by general resourcing issues, however following the fire at Grenfell Tower in 2017 and the subsequent report produced by [Dame Judith Hackitt](#), authorities are rightly questioning the 'balance' between commerciality and the need to fulfil their statutory public protection functions.

The positioning of BC Solutions was raised during the service review, and it is clear West Berkshire are keen to ensure BC Solutions has a clear focus on public protection, public service ethos and community interest and consider this should be seen as a unique selling point.

We are all aware that local authority building control will remain solely responsible for the formal enforcement of building regulations on works not dealt with directly by the Building Safety Regulator under the provisions of the Building Safety Act 2022 and while enforcement can be challenging and resource heavy, there is a growing sense that local authorities should better support their building control teams to enforce more effectively.

Good builders are happy to have their work inspected and collaborate and cooperate with their building control provider. They are frustrated when they perceive sub-standard work is going unchecked and those inferior quality builders not dealt with appropriately.

Increasingly building control teams are using social media to highlight the work they are doing in relation to public and consumer protection, and it is hoped this will increase the awareness and trust people have in the service and encourage them to use local authority building control on any future projects.

To raise awareness of local authority building control, local authorities need to increase their efforts to educate and inform the residents and local businesses in their areas and clearly demonstrate the work they undertake on their behalf.

It is clear building control teams need to operate effectively and efficiently, and there is no reason this cannot be achieved while maintaining a focus on public protection.

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# K. Recommendations

## K.1 Context

It is important that any decision on extending the existing partnership is taken with an understanding of the context each service operates under.

The service reviews conducted on BC Solutions and Reading's building control services give far more details, however the text below provides a summary of issues faced.

### K.1.1 BC Solutions

BC Solutions have undergone some significant changes in recent times, not least RBWM leaving the partnership, and the uncertainty it has faced operating a service for West Berkshire without a formal mandate to do so.

The Service Manager at BC Solutions has faced the challenges posed by the introduction of the Building Safety Act 2022, encouraging and supporting his team through formal learning. Although he is mindful this has increased the pressures faced by the team - he appreciates the importance of positioning them to be able to validate their competence and register under the Building Safety Regulator, a requirement which comes into force in April 2024.

The team has recently lost an experienced member of the team and the Service Manager will be working hard with the team to ensure reasonable levels of service delivery are maintained.

The Service Manager has made it clear that any further significant change at this time is likely to adversely impact on an already precarious service.

### K.1.2 Reading

Reading has operated with no surveyors on the establishment for some time. While the agency surveyors are ensuring service delivery is maintained, there is no 'real' resilience, and it is understood most of the surveyors may decide to leave the profession when registration becomes mandatory.

The Development Manager has made a positive impact on the service since taking up management responsibilities, although she would be the first to admit she is not an expert in this field.

Processes and procedures have been reviewed, revised and improved by the newest member of the technical support team under the guidance of the Development Manager, this is really encouraging and seems to be having a positive effect on the whole building control team.

The Development Manager has made it clear she wishes to continue with the good work she and the team have been doing.

### **K.1.3 Next steps**

Various recommendations have been made within the service review reports to support service improvements and it is hoped these will be progressed as time and resources permit.

Because of the situation at both authorities, it is not considered appropriate at this time to commence a shared service programme to include Reading, however this does not mean that BC Solutions and Reading should not continue to explore this as an option.

It is considered important to allow the Service Manager at BC Solutions to re-vitalise the existing arrangements with West Berkshire and put in place a formal agreement. While we are not suggesting a change in governance arrangements, various options have been provided for consideration.

The Development Manager at Reading is keen to see service improvements and continue the progress which has been made, however because of lack of specific experience in building control management and the challenges currently being faced by the sector, it is suggested arrangements be put in place to allow the Service Manager at BC Solutions to offer guidance on the statutory and technical aspects of building control management.

During this period of support, BC Solutions and Reading could start to explore the practicalities and benefits of extending the partnership to include Reading. Information sharing can take place, particularly in terms of finances, potential establishment structures and issues such as how re-charges could be managed.

If the situation at BC Solutions or Reading change significantly there would of course be a need to review this suggested approach.



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# L. Closing Remarks

LABC have reviewed the information gathered during the peer reviews and taken advice on the governance models adopted by local authorities and the legal frameworks in place to facilitate partnership working.

It is hoped this report provides BC Solutions and Reading's building control services with a steer on the potential next steps.

The next few years are likely to be some of the most challenging faced by local authority building control in a generation and shared service arrangements are likely to increase to enable local authorities to better manage service delivery, some small stand-alone building control teams may well struggle to maintain the necessary levels of resource and competence.

LABC would like to reiterate that we are here to help and support Wokingham, West Berkshire and Reading councils in any way we can.

Thanks again go to all those who supported LABC during the service review process, your input and insight has been invaluable.

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# LABC Consultative Peer Review

BC Solutions

October 2022

A geometric diagram on an orange background showing a right-angled triangle. A vertical line and a horizontal line meet at a right angle. A diagonal line extends from the vertex of the right angle, forming an angle of 38 degrees with the horizontal line. The angle is marked with a curved line and the text '38°'.

38°

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# A. Executive Summary

## A.1 Report overview

LABC were invited by BC Solutions (BCS) - (which is a two-way shared service between West Berkshire Council and Wokingham Borough Council) to undertake this review, as part of its scoping for the future direction of the building control service.

BCS was established in April 2015, as a two-way shared service with the Royal Borough of Windsor & Maidenhead (RBWM) and in July 2016 West Berkshire District Council (WBDC) joined the arrangement, under a new agreement which expired in June 2021. In September 2019 the RBWM announced its intention to leave the shared service on the expiry of the agreement, and it was not possible to obtain formal approval to extend the agreement with WBDC, which has meant BCS has been operating across WBDC on a goodwill basis since June 2021. Having no formal arrangement in place is considered to have had a destabilising effect and impacted on the ability of the Service Manager to manage and market the building control service, this is commented on within this report and accounts for some of the recommendations made.

The review will also explore the possibility of creating a three-way shared service, following an approach made by Reading Borough Council.

The review will be split into two key areas:

1. A service review of the BCS service, which will cover:

- Views of staff members (confidential staff survey)
- View of senior management and building control staff (stakeholder interviews)
- Staffing structure – competencies, resilience and succession planning
- Service compliance in terms of regulations, processes and standards
- Fees and charges – including compliance with statutory requirements
- Market share
- IT systems
- Recommendations

Information gathering was undertaken by a mixture of confidential staff surveys, stakeholder interviews, 'secret shopper' exercises, accessing business and marketing databases, instructing a subscriber report and analysis of published data on the West Berkshire and Wokingham area.

A separate report will be issued in relation to the second part of the review

2. A Business Change Case review, considering:

- Financial and operational viability of a three-way service with Reading Borough Council
- Future operating models, including the continuation of the current shared service model under the Local Government Act 1972 or other models that may be appropriate and associated governance structure
- Branding and positioning
- Outline business case for change

**The key findings are as follows:**

- BCS is delivering a good service for Wokingham and West Berkshire however there appears to be concern over its governance and identity as a local authority service, work needs to be done to ensure all parties are satisfied their councils objectives are achieved.
- BCS is performing well compared to other building control services, although the strain currently being felt by the team may adversely impact on this – the Service Manager is acutely aware of this and is continually reviewing the service and making changes where necessary, however recruitment and retention will remain a challenge.
- The proportion of work undertaken by BCS across Wokingham and West Berkshire appears to be on a steady decline, the introduction of the new Business & Marketing Manager post should enable focus on promotion and engagement with existing and prospective clients, which in turn should improve market share.
- BCS is supporting a programme of learning and development which should ensure the necessary provisions are in place to fulfil its statutory obligations under the proposed Building Safety Act to the new building control regime, including the registration of all building control staff, due to come into effect in 2023.
- Financial management of Building Control does not appear to be fully in accordance with all the provisions of the Building (Local Authority Charges) Regulations 2010 and recommendations have been made to develop better working relationships with BCS and the Finance team.
- A Processes and Controls Audit was undertaken on the 13<sup>th</sup> October 2022, while some minor opportunities for improvement were raised, it was clear processes and practices are generally very good.

Copies of the service review presentation slides used to give a brief overview of the findings at the virtual meeting on the 2<sup>nd</sup> February 2023 are included in Appendix 5.

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# B. The Brief

## **B.1 LABC was commissioned by BC Solutions (BCS) to undertake a review of their Building Control Service and provide further commentary on the business change case for a potential three-way shared service with Reading Borough Council.**

The review will focus on two key themes:

1. A consultative peer review of the BCS service, covering:

- Views of staff members (confidential staff survey)
- Views of senior management and building control staff (stakeholder interviews)
- Staffing structure – competencies, resilience and succession planning
- Service compliance in terms of regulations, processes and standards
- Fees and charges – including compliance with statutory requirements
- Market share
- IT systems
- Recommendations

Information gathering was undertaken by a mixture of confidential staff surveys, stakeholder interviews, 'secret shopper' exercises, accessing business and marketing databases, instructing a subscriber report and analysis of published data on West Berkshire and Wokingham.

2. A Business Change Case review\*, considering:

- Financial and operational viability of a three-way service with Reading Borough Council
- Future operating models, including the continuation of the current shared service model under the Local Government Act 1972 or other models that may be appropriate and associated governance structure
- Branding and positioning
- Outline business case for change

\*note, this will be dealt within in a separate report

The finding of the review will be presented by LABC to representatives of West Berkshire, Wokingham and Reading council's.

# C. Background on LABC

## C.1 Member organisation

LABC is the member organisation representing all local authority building control departments in England and Wales with around 3,500 professional surveyors and technical support staff.

LABC members nationwide deal with around 67% of all building control applications across all sectors of the built environment: domestic extensions, conversions and improvements; new homes and apartments; commercial new-build and conversions (offices, retail, hospitality, industrial and logistics); education; healthcare; care homes; leisure and entertainment; stadiums.

LABC builds awareness of local authority building control amongst the public, developers, designers, and contractors. It also works with government, trade organisations, manufacturers, distributors, research establishments and professional institutions to support competence, standards and safety in building.

## C.2 LABC's key functions for member local authorities are:

- Government policy working with ministry committees; liaison with the Government Departments, the LGA, Fire & Rescue Services, HSE, Trading Standards and Public Protection and OPSS.
- National standards, national ISO, national performance measures, competencies, and validation programmes
- Learning, qualifications, training programmes, apprenticeships, CPD and specialist knowledge – in recent years LABC has invested well over £2 million pounds to improve standards and learning.
- Successfully obtained grant funding to support training, development and recruitment to the profession.
- Member technical conferences and events
- Research into building control, compliance, and enforcement
- Technical liaison with industry, Competent Persons Schemes, BSI, testing, and certification, etc.
- Technical guidance and publications
- LABC schemes: Partner Authority Scheme & Registered Construction Details
- Management and legal opinions for members
- Crisis management support
- Change and transformation in local government
- National business relationships, brand awareness, portals, social media, and digital outreach
- Local business relationships and roadshows
- Building Excellence Awards
- Facilitating local authority sharing of structural calculation checks and plan appraisals.

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# D. LABC Consultants

## D.1 Richard Scott – LABC Head of Member Support

Richard Scott contributed to this review by providing a co-ordinated perspective on all facets of service delivery, aiding all aspects of the review, and leading on the preparation of the final report for submission.

Richard is a successful former local authority manager, responsible for Building Control, Local Land Charges and GIS, developing additional income streams and cost saving initiatives.

Richard has over 30 years' experience in the construction industry. Originally from a construction contracting background, Richard has worked also in a private surveying practice, although most of his career has been spent in local authority building control in the East Midlands, where he was responsible for the oversight of many major schemes and co-ordinating council's response to major incidents. An advocate of continuous improvement and delivery of excellent service user provision, Richard is now responsible for providing practical, pragmatic support to local authority building control services considering change and transformation, delivering face-to-face management training and creating and delivering accredited on-line training for technical support. Richard is also developing a CIOB accredited Level 6 Certificate in Building Control Management, which will commence in March 2023. This together with other accredited learning has resulted in LABC being presented with the "Silver Award" for People Development Programme (Public Sector) at the prestigious Learning Awards 2020.

In a wider capacity, Richard is a former LABC President and board member, with a focus on human resources.

## D.2 Paul Cooper – Interim Head of Building Control - Wyre District Council and Business Development Manager at Doncaster Metropolitan Borough Council

Paul contributed to this review as the peer consultant to undertake the qualitative strategic assessment of the service, including the standing and status of Building Control resilience, resourcing, finances, culture and morale. For many years Paul was the Building Control Manager at Doncaster Council and was considered a successful manager, an advocate of modernisation and innovation with in-depth specialist skills in finance, quality, and customer service. Paul now holds the position of Business Development Manager at Doncaster on a part-time basis and the rest of his working time is spent in the role of Interim Manager at Wyre District Council.

As Chair of the Doncaster's Safety Advisory Group Paul advises the Council on safety at a number of sports venues including the Keep Moat Stadium (Football), Castle Park (Rugby) and the home of the oldest classic horse race, the St. Léger festival, at Doncaster racecourse.



Within the Building Control team, a core of highly skilled staff has successfully competed with private sector competition to secure work on many prestigious projects including the National HS2 rail college.

Paul has successfully worked with LABC, as a consultant, on numerous service reviews and business case development projects, acting as a critical friend and a 'sense checker', as a serving building control manager.

### **D.3 Tariq Abdoh – LABC Standards Manager**

Tariq contributed to this review by assessing operational processes and practices. Tariq is an experienced quality management professional, having worked in this specialist area for more than 14 years, working with organisations to implement British and International Standards and devising the Certification Body's approach to auditing and certifying the organisation. Over the years Tariq has gained Lead Auditor status for core International Standards, including ISO 9001 (Quality Management).

Prior to joining LABC Tariq was a Customer Support Manager responsible for developing large contracts through innovative solutions whilst ensuring adherence to ISO 17021 (the Accreditation Standard) and the key point of technical support for commercial employers, key accounts and independent management system consultants.

Tariq joined the LABC team in December 2017 and, over a period of 2 years he was instrumental in the roll out and implementation of the LABC (ISO 9001:2015) quality management system in over 250 Local Authority Building Control teams. The QMS is designed to achieve consistency of approach in public service building control by establishing procedural best practice and to instil a culture of and commitment to continual improvement. This roll out of the QMS is continuing with the intention to establish quality management and achieve 3<sup>rd</sup> party certification for all building control teams in England and Wales.

The BSCF, which is a community interest company established by, but outside the compass of LABC, provides a range of services to the construction industry. It is currently working towards accreditation under the UKAS ISO/IEC 17024 (conformity assessment for bodies operating the certification of persons) for which Tariq is taking a lead role in its development.

### **D.4 LABC Specialists**

Together LABC's team provides extensive management awareness, full legal and technical understanding, in-depth knowledge of quality management systems, a perspective on the wider corporate pressures on budgets, services, and resources in local government as well as wide-ranging experience in the promotion of local authority building control services.

External management consultants do not have these insights nor access to the LABC network's experience across all local authorities in England and Wales.

# E. Methodology

## E.1 Methodology

This review was undertaken remotely. To gain an understanding of senior management and the status of BCS within West Berkshire and Wokingham Council's and where it 'fits' in terms of development and public protection, Richard Scott and Paul Cooper undertook virtual meetings with key stakeholders during September 2022. Roger Paine (Head of Service – BCS) supported the information gathering process, ensuring all relevant documents and information required to inform the review was provided. Tariq Abdoh (LABC Standards Manager) undertook the audit (virtually) on the Building Control team's processes and procedures, reviewing them against the LABC Quality Management System on 13<sup>th</sup> October 2022. In addition, 'secret' shopping exercises were commissioned, LABC and business databases accessed and published data on the West Berkshire and Wokingham areas were analysed.

## E.2 Task Allocation

BC Solutions - Evaluation Project Plan	
Task and Method	Lead
<ul style="list-style-type: none"> <li>Confidential staff survey</li> <li>Financial analysis</li> </ul>	Richard Scott
<ul style="list-style-type: none"> <li>Interviews with Key Stakeholders (Senior Management/Members/Staff)</li> </ul>	Richard Scott & Paul Cooper
<ul style="list-style-type: none"> <li>Remote audit covering: -               <ul style="list-style-type: none"> <li>Processes, procedures, systems, and records</li> <li>Assessment of essential practices against LABC Quality Management System and principles.</li> </ul> </li> </ul>	Tariq Abdoh
<ul style="list-style-type: none"> <li>Secret shopper exercises</li> </ul>	Anna Thompson
<ul style="list-style-type: none"> <li>Business planning data, metrics and published data analysis.</li> </ul>	Dan Falchikov
<ul style="list-style-type: none"> <li>Web site assessment</li> </ul>	Elise Bunyatova
<ul style="list-style-type: none"> <li>Key Findings and Recommendations</li> </ul>	Richard Scott & Paul Cooper

# F. LABC Quality Management System

**F.1 The LABC QMS has been written specifically for public service building control. The processes are general and cover the things that all building control teams do when they are processing an application, checking a plan, consulting with the Fire Service or other Statutory Undertakers.**

ISO 9001:2015 is simply about consistency, best practice, improvement, understanding stakeholders and understanding risks to service delivery – checking that we are doing what we say we are going to do and putting it right when we do not.

The point of LABC's QMS is that it distils the tasks and processes and has produced the 'essentials' procedures mapping of those activities that must be undertaken by a 'good' building control team. These should be identifiable in any team or within any QMS or ISO used within any team. The definition of 'essential' has been made by the LABC National Standards Committee made up of local authority experts from every region of England and Wales. Any additional activities that are specific to one individual authority and/or very detailed 'old-style' ISO process definitions are not in the scope of the National Standards and ISO.

Competencies are covered in the LABC National Quality Management System. Building control surveyors in local authorities are classed across six levels from technical support or trainee building control surveyor:

- **Level 3** Technical support or trainee building control surveyor
- **Level 4** Surveyor working with supervision on domestic projects
- **Level 4a** Surveyor with proven capability to work without supervision on domestic projects
- **Level 5** Surveyor with proven capability to work unsupervised on non-domestic projects and with supervision on non-domestic low risk buildings
- **Level 5a** Surveyor with proven capability to work unsupervised on non-domestic low risk buildings
- **Level 6** Surveyor with proven capability to work unsupervised on higher risk/complex buildings
- **Level 6a** Surveyor with specialist skills

Competencies are captured and outlined in the LABC Competency Matrix – a national matrix capturing qualifications, knowledge, additional specialisms, CPD and supervised experience for individuals. This provides a local authority competency profile which is used for planning learning and refresher training.

At present the BSI are developing an overarching framework for building safety competence of individuals (BSI Flex 8670) – LABC are working to embed the specification into its Learning and Management System.

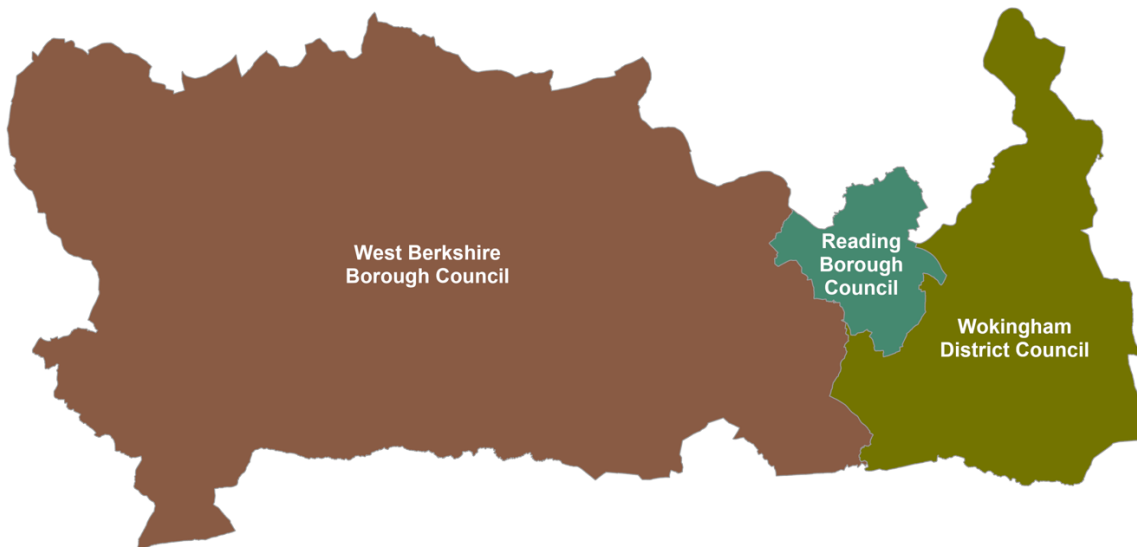
## F.2 The Quality Management System is made up of several parts:

- **The Quality Policy** – a statement of LABC’s commitment to quality service, best practice, continual improvement and customer service.
- **The LABC Quality Manual** – how the whole Quality System works written in accordance with ISO 9001:2015. This describes LABC, public service Building Control, the commercial market, our influencers, the beneficiaries of our service and how the service will be measured, improved and where responsibilities lie.
- **The LABC Procedures Manual** – is a series of process maps for each of the public service building control functions from administering Building Notices and Initial Notices to dealing with Demolition Notices and Dangerous structures.
- **The Detailed Competency Matrix** – a comprehensive model of building control skills and competencies that allows managers to identify the knowledge, capabilities and skills of surveyors against the different levels of work type from domestic extensions and alterations to higher risk buildings. This is mapped against LABC’s Learning Management System and Qualifications (Certificate, Diploma, Foundation Degree and Degree) so that surveyors can clearly identify future learning and development.
- **The LABC Code of Conduct and Professional Ethics** – the code by which all building control teams and individuals within them should work.
- ISO 17024 Competency Validation Assessments – UKAS accredited validation of the competence of persons. The BSCF currently offers validation assessments for domestic, general and specialist surveyors, covering all types of building control work.

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# G. Information Gathering

## G.1 West Berkshire and Wokingham – background information



### Introduction

West Berkshire District and Wokingham Borough councils are two of six unitary councils in Berkshire, providing the full range of local government services following the abolishment of the county council in 1998. They have a history of cooperation and currently jointly provide a number of services including building control (through a joint Building Control Board) <https://www.bcsolutions.org.uk/>. Other regulatory services (also with Bracknell Forest) are shared through a 'Public Protection Partnership'.

Wokingham formally left this partnership in April 2022 but continues to contract with it for services such as trading standards, air quality, animal welfare and other regulatory services, with development control ASB, food, hygiene and pest enforcement (among others) taken back to its sole management.

West Berkshire and Wokingham (along with Reading Borough) have formed a [joint health and wellbeing board](#) to produce a new 10 year health and wellbeing strategy.

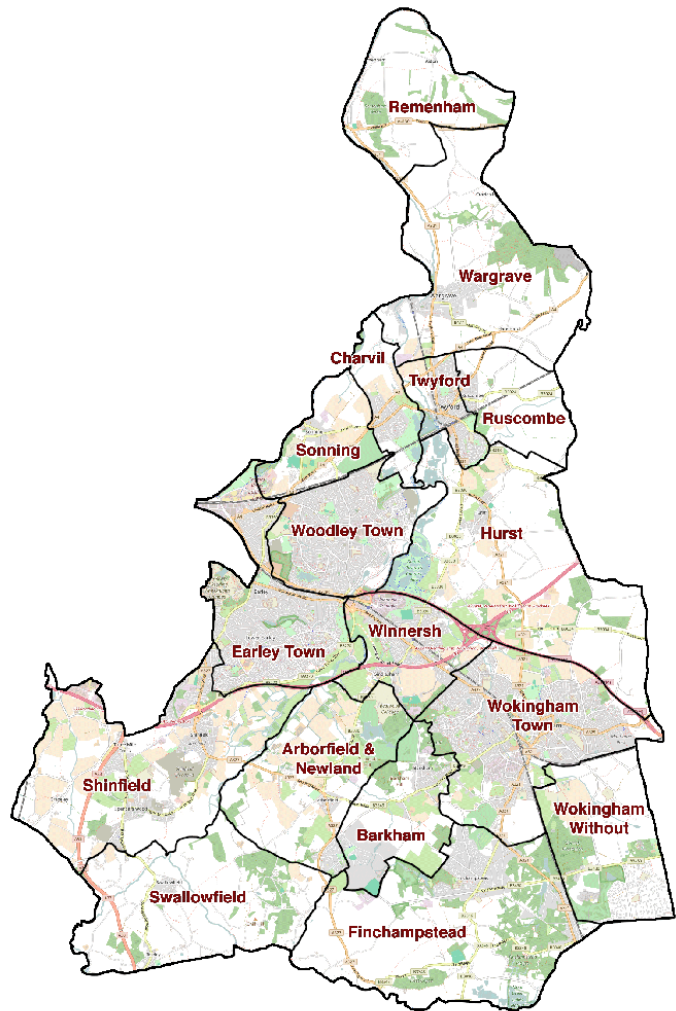
## Demographic profile – Wokingham

Wokingham is a triangular shaped borough between Reading, Bracknell and Maidenhead. With the major settlements stretching from Twyford (population 7,000) in the north, to the fringes of Reading at Earley (pop 32,000) which includes parts of the University campus and Woodley (35,000), south east to Winnersh (9,000) and the largest town Wokingham (47,000) after which the borough takes its name. It is a relatively densely populated, highly suburban area with pop density of 992 persons per square km (compared to 486 across the south east as a whole). The borough has a total population of 177,500 according to the 2021 census estimates and has seen significant growth of around 15% in the last 10 years. The population is expected to continue rising to 185,500 by 2032 and will on average get older.

Wokingham's population is younger than the national average with more under 15s (21.3% in Wokingham compared to 19.2% in England as a whole). It also has fewer over 64s (17.6% v 18.5%), but this will grow to 23.8% by 2043 – slightly higher than the England average, but significantly lower than the south east by then. It is also whiter, with fewer ethnic minorities than the English average, although with a significant Asian/British Asian minority (7.4% of the population as compared to 7.8% in England as a whole).

Wokingham is one of the least deprived areas of the country with not a single output area in the three most deprived deciles and 84% of the output areas in the two least deprived deciles. In only one area – barriers to housing - does Wokingham have any areas in the most deprived deciles – most likely due to the high levels of its property prices relative to income (see below).

Wokingham is conveniently situated for both London and Reading with commuting in both directions and therefore is a high demand area for housing, commercial, educational and other facilities.



## Housing profile

The borough has [more than 71,500 homes](#) with almost 80% being owned outright or with a mortgage. Wokingham probably has more detached housing than any other authority in the country with 36% of all properties being detached – more than twice the English average of 16%. It has very low levels of renting, low levels of homelessness and higher than average household size. The median property price (April 21-March 22) was £450,000 almost double that of the average for England (£270,000).

Over the last four years the borough has delivered more than 1,000 units of housing each year (5,400 new dwellings since 2017/18). See major developments below.

## Wokingham's local plan

Wokingham Borough's [core strategy was adopted in 2010](#) (covering the period up to 2026) and is currently being updated through the Local Plan Update (LPU) process. A change in political administration in 2021 has delayed the planned consultation on it this year, but the LPU is expected in due course.

The strategy envisages focusing development in *'those towns and villages that have or will have a significant range of facilities and services'* and highlights *'Arborfield Garrison, Earley, Green Park, Shinfield, Spencers Wood, Three Mile Cross, Twyford, Winnersh, Wokingham and Woodley'* as suitable for development.

[Four major development projects](#) were identified and are in various stages of development.

These are:

- [Arborfield Garrison major development](#) – including new homes, new schools, local shopping facilities, open spaces and roads
- [Shinfield Parish major development](#) – including new homes, new schools, local shopping facilities, open spaces and roads including the University of Reading's new science park with 55,000m<sup>2</sup> of employment space
- [North Wokingham major development](#) – including new homes, a new primary school, local shopping facilities in a new neighbourhood centre, open spaces and roads
- [South Wokingham major development](#) – including new homes, new schools, local shopping and community facilities, new open spaces and roads.

However, as the core strategy is now significantly dated it doesn't appear to make reference to Crossrail (Elizabeth Line) which now serves the borough at [Twyford](#) on the way to Crossrail's western terminus at Reading. High capacity trains to destinations across London, Kent and Essex serve the station reaching central London in less than 50 minutes. This, along with existing fast trains serving Paddington in less than half an hour, are likely to see significant development demand in and around the station. Reading Borough has developed a [tall buildings strategy](#) and has seen a number of residential and mixed use [tall buildings](#) proposed and approved – particularly around the railway station.

## Issues for building control

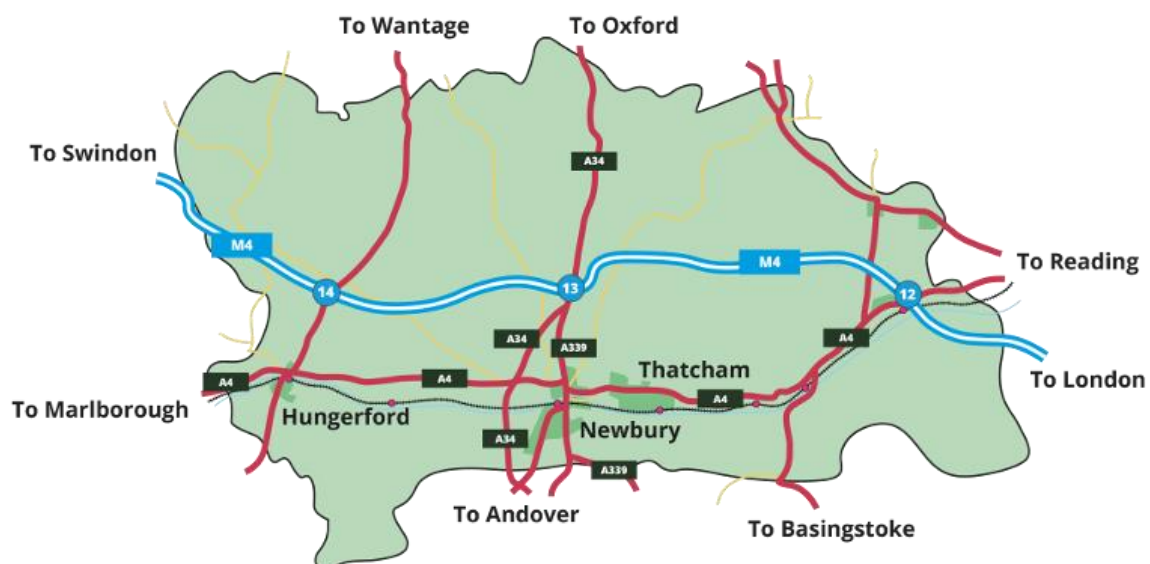
Wokingham is an area of significant development with a strong policy direction and planning framework (but dated). Recent development pressure coming from the opening of Crossrail.

Need to identify BC's role in major developments outlined in the core strategy

With Crossrail now serving Twyford development pressures are likely to see demands for tall buildings in and around the station (like in Reading)

## Demographic profile – West Berkshire

West Berkshire is a large and heavily rural district of more than 700km<sup>2</sup>. It stretches from the outskirts of Reading to Hungerford and the border with Wiltshire. London is more than three times as far from Hungerford than Swindon (almost 70 miles v 20). The Council analysis shows 90% of the district is rural with 74% of the area within the North Wessex Downs AONB. The majority of the population live in either the Kennet Valley or in the east of the District along the border with Reading. The major population centres are Newbury/Thatcham (70,000 population), Hungerford (6,000), Theale (3,000) and suburban Reading including Pangbourne, Tilehurst and Calcot (31,000).



The 2021 Census estimates the district's population as 161,400 with a population density of just 229 persons per km<sup>2</sup> – less than half the average for south east England (486).

West Berkshire's population is slightly older than the English average with 19.6% of the population over 64 (v 18.4% for England as a whole) and this proportion is expected to grow to over 28% by 2043 (significantly higher than the projected England average of 22.2%).

West Berkshire's population has grown from 153,800 in 2011 to 161,400 in 2021 (c5% growth – less than Wokingham) and is projected to remain flat over the next 10 years



In terms of ethnicity West Berkshire is even more white than Wokingham with just 5.2% of the population BME.

West Berkshire is one of the least deprived areas in the country (although not as much as Wokingham) with just two output areas in the three most deprived deciles. It also shows some levels of deprivation in education with 11 output areas in the three most deprived deciles nationwide. However, in housing and environment, West Berkshire shows significant levels of deprivation: here deprivation is measured by both 'geographical barriers' (relating to the physical proximity of local services) and 'wider barriers' (including issues relating to access to housing such as affordability). A total of 30 output areas are in the three most deprived deciles reflecting the district's rurality and (likely) relatively high housing prices – house prices in West Berkshire are 1/3 higher than the England mean (at £365,000 Apr 21-Mar22). It is also likely the quality of some of the district's housing stock is of poor quality as the district also reports 21 output areas in the three most deprived deciles for 'living environment deprivation' – this is a measure of both the 'indoor' quality of housing and 'outdoor' environment such as air quality.

### Housing profile

There are [69,500 homes](#) in the district with fewer flats (16% compared to 23% in the SE as a whole) and terraced homes (19% v 24%) and more semi-detached (27% v 21%) and detached (26% v 20%). Tenure is very similar to the SE of England as a whole with slightly more private ownership through a mortgage and slightly less private renting. Social home tenure is almost exactly on the average for SE England (13.8%:13.7%) with the major caveat that West Berkshire council has almost no council tenanted properties following one of the earliest housing stock transfers (in 1989) to a social landlord – West Berkshire HA now Sovereign Housing.

Since 2017/18 the council has overseen the delivery of just over 2,000 new housing units.

### Local Plan

West Berkshire local plan review was launched in 2020 (an [emerging draft](#) was published in December 2020) with the aim of extending its existing strategic plan to 2037. It envisages between 8,840 and 9,775 additional homes to be built in this period (520-575 per year). As of March 2020 sites for an additional 4,653 homes had been identified with planning permission and a further 3,461 without it. This additional unconsented figure includes 1,000 homes at Sandford Park in Newbury half of which are assumed to extend beyond the 2037 period.

The council envisages the vast majority of this development to take place away from the AONB and in the existing developed communities of the Kennet valley and western suburbs of Reading.

In addition, West Berkshire's planning has to accommodate two Atomic Weapons Establishment facilities at Aldermaston and Burghfield both of which require buffer zones around the facility. The plan further states: *"In the interests of public safety, residential development in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) has advised against that development."*

Flood risk is also a major issue for development with the emerging local plan stating, *“The risk of flooding within West Berkshire is widespread, arising not only from rivers, but also from surface water and groundwater flooding.”* The emerging plan states the council will take a sequential approach and only accept plans for development in areas with flood risk if *“if it is demonstrated that it is appropriate at that location, and there are no suitable and available sites at a lower flood risk”*. In addition mitigation measures will need to be set out as part of any plans.

### **Issues for building control**

West Berkshire is a highly rural area with development very much limited to ribbons of urban development – likely to have numbers of domestic/agricultural conversions etc as the core business of Building Control.

It has not delivered a huge number of new housing because of constraints – AONB, AWE and more geographical remoteness from London (possibly due to demand). But clearly there is an issue of relatively high house prices and relatively low wages leading to housing unaffordability and pressure will be on to deliver more in future.

Other than at the east of the district (Reading suburbs) it doesn't share a lot in common with Wokingham

Newbury and Lambourn are two of the biggest centres for the horseracing industry – this may involve work on public events and safety – but there may also be other associated opportunities.

Newbury is the site of Vodafone's HQ – there are other large companies, such as AWE and Microfocus based in and around the borough for which there is a potential for partnering.

The service has been adversely impacted by the loss of two senior surveyors, both of whom left to work for a locally based approved inspector, taking valuable custom with them which has in turn had a significant impact on market share. It is understood that a number of national approved inspectors, as well as smaller local firms have their regional offices/headquarters based within or adjacent to the area BCS service.

## **G.2 Building Standards**

Building Control is often considered as a small 'technical' service, the shared service arrangements between West Berkshire and Wokingham have enabled BCS to create a reasonable staffing structure, however vacancies exist on the establishment for which BCS, similar to other building control services, find recruitment difficult.

Irrespective of section size, BCS should more accurately be regarded as the team that ensures what is built in the borough and district areas meets the appropriate standards for individuals, communities and the councils own strategic goals, bearing in mind the market share the service current attains.

Building Control is the only local government regulatory function in competition. However, the private sector alternative does not follow the same processes as public service building control: they are profit making private companies without any formal enforcement powers. Across both council areas, BCS currently deals with around 54% of the overall number of building control applications within the borough, this is below the national average level for authorities in England & Wales, which is around 67%. The average across the Central region when LABC last undertook a survey (2020) was 56%.

A good Building Control team makes a difference to the quality of the built environment, making sure minimum standards are met. Enforcement is not solely made through prosecutions and the powers that can be used to have work put right - building control teams carry out site inspections and application assessments as 'soft' enforcement which prevent compliance issues occurring and contribute significant benefits in respect of reducing latent defects.

In relation to 'hard' enforcement, BCS have adopted LABC's formal enforcement policy document, this will provide staff with guidance on how enforcement should be managed. It is suggested this be available on the BCS website, for customer reference. In recent years there has been no formal enforcement action under Section 35 or 36 of the Building Act 1984 in relation to penalties for contravening building regulations and the removal or alteration of offending work. On average BCS receive in the region of 110 regularisation applications (for unauthorised works) each year, which is reasonably high. It is presumed these were dealt with through necessary remedial works to ensure compliance with the building regulations and not action through the Courts.

### **G.3 Other Strategic Contributions by Building Control**

Local authorities have a duty to bring the Building Act 1984 into effect and enforce the building regulations in their area. They are obliged to undertake a range of functions aimed at securing the health, safety, welfare and convenience of people in and about buildings. But the work is not limited to chargeable functions (these are described in Section H11) - a duty exists to deal with other functions relating to public safety, such as dealing with demolition works, for which BCS receive around 60 demolition notices per year and processing applications and work which the local authority is not able to levy a charge for (statutory non-chargeable work), such as Disabled Facilities Grants, for which BCS receive around 21 submissions, as well as administering around 1700 Approved Inspector notices each year.

Another key statutory function is effectively and safely dealing with dangerous structures. Building Control undertakes a key role, not only in advising the Emergency Services on matters of structural stability and their safety in relation to entering premises but also in specifying remedial works and temporary works to make structures safe.

Dangerous structures occur for many reasons: explosions, fire, collisions, adverse weather conditions, as well as partial collapse or unsafe working practices. These can occur night or day and other emergency services rely on Building Control to assess structural stability and other essential factors, during search, rescue and recovery phases of an incident. A timely, professional, and proportionate response is vital and can protect the borough in cases where claims and challenges are made through the courts by property owners and people who may have been impacted.

Historically, Wokingham operated an out-of-hours dangerous structure rota, unlike the West Berkshire and former shared service partner – Royal Borough of Windsor and Maidenhead (RBWM). In 2021 this service provision was removed since it was no longer possible to guarantee contractor support and while existing shared service partners wanted to maintain/establish a functional dangerous structure out of hours call-out service, it was agreed each would have to be financed by the individual authority and to date this has not been possible to progress this to completion.

At present, dangerous structure cover is only provided during normal office hours and where attendance at a dangerous structure incident involves part out of hours working, this is managed in accordance with the Wokingham Borough Council policy on overtime.

The registration of scaffolding and hoarding licences is carried out by BCS on behalf of Wokingham Borough Council (WBC), the inspection and enforcement element is undertaken by the highways team.

In July 2019, council members at Wokingham and West Berkshire unanimously declared a climate emergency, each separately setting out a commitment to become carbon neutral by 2030.

Both councils have published plans outlining the things they intend to do, to work towards being carbon neutral, these plans include things such as:

- Retrofitting domestic and commercial properties and schools
- Improving energy performance of housing stock
- Increasing the deployment of renewable energy across the Council's estate.

Both have made good progress, for example Wokingham Borough Council have so far facilitated over 1500 households to receive assistance from the 'help to heat' scheme, which includes loft and/or cavity wall insulation works.

The skills and knowledge of building control surveyors are perfectly aligned to support these plans and the initiatives being delivered however, to do this, consideration must be given to surveyor resources. Competency needs to be matched to work and there needs to be sufficient resources to ensure resilience so that core functions such as public safety, protection and enforcement are not compromised.

# H. Key Stakeholder Feedback

## H.1 Interviews and/or questionnaires were used with the following participants:

<b>Portfolio Holder – Planning and Building Control at Wokingham BC</b>	Lindsay Ferris
<b>Interim Assistant Director, Delivery &amp; Infrastructure at Wokingham BC</b>	Trevor Saunders
<b>Public Protection Manager at West Berkshire BC</b>	Sean Murphy
<b>Head of Development Management at Wokingham BC</b>	Marcia Head
<b>Head of Development Management at West Berkshire DC</b>	Bob Dray
<b>Head of Service at BC Solutions</b>	Roger Paine
<b>Financial Business Partners at Wokingham BC</b>	Asher Stanford and Richard White
<b>Building Control Surveying Team at BC Solutions</b>	Sara Hiscox, Gareth Sexton, Charles Bradshaw, Warren Woodhams, Dan Cheeseman, Hannah Campbell, Lokendra Chemjong, Lorraine Kenny, Rohan Kumar, Sam Whitlock
<b>Building Control Technical Support at BC Solutions</b>	Lisa Alder, Natasha Mace, Laura Palmer & Rebecca Alder

## H.2 Perception and Understanding of the Team across the Councils

LABC, as part of the review, were fortunate enough to hold stakeholder interviews with the building control team and those providing the administrative function. In addition to this, interviews were held with key elected members and senior staff across both authorities.

Stakeholder interviews are considered important to gauge the level of understanding of the service and its perceived 'standing' within the Council, among other things. The commentary below outlines the key points from these interviews.

Building Control services within local authorities do not typically have a high profile, and this lack of profile and standing can be exacerbated for shared services, particularly in the case of the non-host authorities.

The Interim AD at Wokingham believes BCS to be relatively 'invisible' within the council and concedes that there are currently few opportunities to raise the profile of the service.

The previous lack of building control attendance at management 'catch up' meetings may well have contributed to this, and it is encouraging to note the restructure which came into effect from March 2022, creating an integrated planning service within the Place & Growth Directorate in WBC. The Service Manager is now involved in these meetings which will enable him to be far more aware of what opportunities are likely to present themselves, although it is appreciated not everything discussed will be relevant to building control.

From the perspective of the Public Protection Manager at West Berkshire, it appears building control is only 'on the radar' when complaints are received. There is a real sense that the lack of physical presence within West Berkshire's council office has adversely impacted on the standing of the service, leaving some to feel as though they '*have become an authority without an internal building control service*' -, this should be considered concerning, in terms of the long-term future of the shared service.

It is understood pre-COVID, a team was located in WBDC offices, however a 'single team' approach was agreed pre-COVID as the best approach, meaning all staff were based at WBC offices. Since COVID remote working has been established across both councils, an unintended consequence may be considered a diminution of relationships with other team, in particular.

The Public Protection Manager also expressed concerns about the 'identity' of the shared service – believing more focus should be given to the local authority (public service) aspect. The issue of identity was also raised during the stakeholder interviews where a surveyor stated they had received numerous queries from clients who thought BCS were approved inspectors – there appears to be some misunderstanding about the nature of BCS, despite West Berkshire and Wokingham council's being featured on the BCS website. It may be a re-branding exercise is required, which could include reviewing the partnership name.

Regarding the website, the Head of Development Management at Wokingham commented on the fact that BCS has a stand-alone website (not part of the council(s)), this is another area where a lack of 'identity' may be an issue. It is noted that consideration was given to upgrading WBC's website, however a Building Control Board decision was taken to 'unify' the service with a separately hosted website.

It was encouraging to note the Portfolio for Planning and Building Control, who has been in post at Wokingham since the end of May 2022, considers building control to be a well-respected service compared with some other services within the council and he believes they are not a great drain on council resources.

In terms of elected members, it appears there is very limited exposure to building control. It is understood that the Building Control function is mentioned in member inductions, however this appears only to be a cursory note with no details of the specific functions undertaken and the competitive environment in which it operates. This is considered a missed opportunity to raise the profile of the service. It seems members are only concerned with the service when their constituents raise issues.

LABC has a formal presentation available that can either be delivered face-to-face with elected members and senior managers or as a recording. We recommend either is used every time there is a change of elected members.

The presentation deals with building regulations and compliance in fee-earning building control work.

The three key topics are:

- Building Control's role
- Operational context
- Challenges facing the service

Little, if any, time or focus is given in terms of clear professional engagement and business development, to raise the profile of Building Control and make members and employees aware of its duties and functions. It is understood that the LABC member presentation has been offered to both authority's but has not been taken up.

It is clear the Interim AD appreciates the importance of the service and is doing what he can to 'fight the corner' for BCS. He supports the actions of the Service Manager whose skills he values. The Interim AD believes BCS could be more proactive, in terms of winning work and believes the Service Manager, as a seasoned professional, could be more effective in terms of general communications and taking the service forward, although he concedes this view needs to be considered in context with the pressures all council services have been under in recent times.

The Building Control Board met three times a year and management briefings were held quarterly, up until the expiry of the formal agreement in 2021, since then a lack of interest and attendance has seen these cease. The turnover of Assistant Directors at WBC over the past couple of years has not helped the situation, both could be seen as contributing factors for the perceived lack of 'identity' for the service.

Considering the responses 'as a whole' it is clear Building Control has relatively little 'standing' within the Council. It is not unusual for Building Control to have a lower political profile than other sections, especially Planning, since Building Control does not refer to a committee for decision making, meaning regular member involvement and engagement does not take place.

### **Recommendations**

- 1. Discussions to take place with Wokingham and West Berkshire to gain a better understanding of how a lack of physical presence impacts on the standing of the service and engagement with other council services.**
- 2. Discussions to take place with Wokingham and West Berkshire to determine how best to 'frame' the partnership as a public service, this could be part of a wider 're-branding' exercise including the potential renaming of the service.**
- 3. Briefings undertaken, to raise the awareness of the Building Control service to members, staff, and management.**
- 4. Building Control Board meetings and management briefings be reinstated as a matter of urgency, to re-build relationships across the shared service.**

### **H.3 Opportunities through Development Management**

Building Control sections within local authorities are in a prime position to engage with prospective clients, providing they are integrated within a “development team” approach.

When asked about the development agenda across Wokingham, the Interim AD informed us that there was plenty of opportunities for building control, with around 800 houses developed per year, around 4000 planning applications and significant town centre development planned. The issue appears to be the lack of integration across planning and building control, which means no one is putting the services of BCS forward.

The Head of Development at Wokingham confirmed there were strategic development locations (SDL's) for 10,000 new homes with around 75% complete and the local plan was being updated with two more SDL's for the next ten years.

The Head of Development Management at West Berkshire also confirmed their local plan revisions were in progress, ready for examination in Spring 2023. Again there appears to be a substantial amount of housing in the pipeline, as well as a sustained high level of applications over the past five years.

There is no evidence to suggest the BCS team have an effective working relationship with Planning, which is disappointing. This appears to have been impacted by the relocation of the service when BCS was established (prior to this planning and building control sat side by side in both authorities) as well as the lack of formal arrangements to support better integration, not only with BCS and Planning but with other relevant sections within both councils.



It is understood that the property team at WBDC have used the services of approved inspectors for their corporate projects for many years, despite approaches being made by the Service Manager on several occasions to facilitate a different approach. Similarly, Wokingham Housing Company continues to use the services of approved inspectors for its housing developments. It is encouraging to note a recent commitment has been given by WBDC to trial a new approach which includes the services of a lead senior building control surveyor within BCS for WBDC projects and perhaps the change in senior management at Wokingham may give their team an opportunity to take a similar approach. The adverse impact, losing council projects to approved inspectors, on the building control team cannot be stressed enough, such an approach is so damaging and approved inspectors will no doubt use this information when pursuing other projects.

Despite the lack of any formal arrangement, it is understood that BCS undertakes the work carried out on behalf of both councils, which should be the case, however clearly more work can be done to secure more non-council work.

Little if any promotional work is undertaken by the BCS team and it is understood little is done in terms of gaining an understanding of what projects are coming through the planning 'pipeline'. This should be considered a missed opportunity and an area where more focus should be given. Exciting developments such as the Shinfield Studios, which is described as 'a new powerhouse of British film, TV production and innovation, is a prime example of the work BCS could possibly be involved with were they more proactive.

If BCS engage with prospective clients at the earliest stages of the development process (e.g., major project team meetings at both councils) to provide timely advice and offer their services, it is likely they would be able to secure some additional future business.

Lack of effective promotion of the service and engagement with clients should be considered a missed opportunity, not only in terms of potential income but also in terms of influence on the built environment. Simply put, the greater the number of schemes dealt with by the BCS team, the greater the influence both councils will have on the quality of the built environment and the health and safety of residents and users of those buildings.

The Service Manager is clearly sensitive to this, and this will no doubt have been one of the factors leading to a change in the establishment to create and appoint to the new post of Business and Marketing Manager.

### **Recommendations**

- 5. Consideration be given to identifying the best and most appropriate ways to facilitate better working relationships between BCS, the planning teams at Wokingham and West Berkshire and other relevant council sections. This may include a structured approach to ensure Building Control is actively involved in all relevant pre-application meetings.**
- 6. Discussions be held by senior management and elected members with responsibility for building control across both authority's about using BCS for all in-house and council funded schemes.**

## H.4 Staffing & Resilience

A lack of resourcing was mentioned during stakeholder interviews and was reinforced in the feedback given as part of the confidential staff survey.

The Building Control establishment currently comprises:

- 1no. FTE - Service Manager
- 1no. FTE - Business & Marketing Manager (newly created post)
- 1no. FTE - Senior Technical Support Officer
- 3no. FTE - Technical Support Officers (one post vacant at present)
- 1no. FTE - Building Control Team Manager
- 1no. FTE - Principal Building Control Surveyor
- 2.66no. FTE - Senior Building Control Surveyors (one post vacant at present)
- 6.8no. FTE - Building Control Surveyors (one post vacant at present)

At present the vacant Building Control Surveyor (BCO) post is being covered by an agency surveyor, provided through the BRG Agency, his role is to cover site inspections within the Wokingham area, it is understood his contract runs until the end of March 2023. Up until around September 2022 the vacant Senior BCO post was being covered by a remote plan checking consultant, however it is understood, because of issues with plan checking target dates, plan checking across the whole service area is now undertaken by the Principal BCO and a BCO.

All other surveyors are undertaking site inspections only on a temporary basis, because of resourcing levels and the current commitment to training. During the stakeholder interviews there appeared to be an appetite for plan checking to be undertaken on an area basis. The benefit of this is that surveyors become more rounded as they undertake both aspects of application work.

The BCS team are a mix of experienced and less experienced staff, which provides a good balance and opportunities for development.

The technical support team consider themselves to be working well, however the surveyors currently feel that they are performing 'not too bad', compared to the KPI's set.

There is a reasonable establishment at BCS, however the issues around recruitment to the vacant posts is no doubt adding additional pressure to the team. This is something the Interim AD is fully aware of and feels the service would face really difficult times should even one member of staff leave.

BCS has a risk register, the three main areas of concern currently are:

- Staff resources
- Low staff morale
- Insufficient budget

All three have a gross rating of 16 on the risk matrix, meaning they are considered an extreme risk, with a high likelihood of occurring and a subsequent high impact.

Preventative actions are outlined, for all three identified risks, although the new 'net' rating has only been determined for the risks associated with staff resources.

A buddy system was introduced around 10 months ago to help cover inspections, develop consistency of technical interpretation, deal with commitments on training and to maintain consistency of service delivery. While this seems a very sensible approach, some staff feel this is not working as effectively as it could and there doesn't appear to be a back-up plan, should issues arise, particularly around sickness and leave.

The confidential staff survey highlighted the pressure some staff are under, one member of the team stated, "I physically cannot keep up with the workload". This situation not only puts pressure on staff and may create stress, but it also has the potential to impact all the team.

The support team commented that as the 'face' of the operation and first point of contact for clients, they are often put in the situation where they are unable to answer queries because site notes are not up to date. Conversely, the surveyors commented on the fact that previously the support team used to deal with simple queries, however they now seem to pass all calls through. It is understood the support team receive approximately 100 enquiries per day, of which around 10 passed across to the surveying team, despite this the surveyors do not appear to consider the support team as 'the first line of defence'.

There certainly appears to be some tension between the technical and support teams, it was described by one member of the team as "a battle with no discussions to help resolve things". This may be an isolated opinion; however such perceived tensions are not conducive to effective working relationships.

Despite current workloads, emphasis has been placed on training and development, with staff having individual training plans which is encouraging and certainly in line with the Governments and LABCs commitment to raising the standards in building control. However there is a potential for an imbalance to be reached whereby the effectiveness of work and study is adversely impacted.

Recruitment and retention of staff is a real issue across most if not all building control services. Key factors have been highlighted in the risk register, which may impact on this, including salary structures, low interest in the profession, increased reactive workload and lack of management communication. Another factor may be the lack of long-term commitment to the partnership, an issue that the team has been waiting on a decision for since September 2019.

It is understood one of the Senior BCO's has handed in his notice (he is leaving to work for a neighbouring LA), this will further impact on the level of resilience within the team. This supports the opinion that there is a high risk, under the current circumstances that staff will be lost to other local authorities or an Approved Inspector.

### **Recommendations**

- 7. The Risk Register should be reviewed, updated as necessary and appropriate preventative measures actioned.**
- 8. The Service Manager should review the effectiveness of the 'buddy system' with staff.**
- 9. Regular 'whole team' meetings should be arranged to improve team working and to discuss and resolve any emerging operational issues.**

- 10. A small task group comprising technical support and surveying staff be formed to review how work balance and process could be improved.**
- 11. That a resolution be reached on the future of the partnership through a long-term agreement which includes a commitment to its future success.**

## **H.5 Succession Planning**

Succession planning is an important part of any long-term business plan. Unfortunately, many local authorities have not, for one reason or another, created a robust succession plan for their Building Control teams and this had led to many having a disproportionately large gap between the most experienced and least experienced staff. Typically, the reason for this gap has been the lack of investment in Building Control staff development and recruitment over the last 15 – 20 years. This period has also seen a notable reduction in the status of Building Control in many local authorities.

The age profile for the surveying team is around 40 years of age, this is lower than the national average for building control, which currently stands at around 56 years of age, the technical support teams age profile is around 33 years of age.

BCS is in a better position than many local authority building control services. Succession planning is covered within the current business plan (agreed at the BC Board on 21/10/19), and it is noted BCS intends to 'grow our own' surveyors by introducing a trainee scheme. Success has been achieved in this regard with colleagues across the construction industry being offered re-training and attainment of qualifications as a building control surveyor, in addition to this members of the support team have progressed to surveyor posts. At present two colleagues with Housing and Structural Engineering backgrounds are competing their LABC Level 5 diplomas. The approach of BCS is really encouraging and should be commended.

It is understood BCS is currently considering taking a trainee (on a three-year secondment), under the LABC SR21 programme, funded through DLUHC to support the new regulatory regime. This would provide BCS with a valuable additional resource, which would cost virtually nothing (training and salary costs covered by DLUHC funding) and hopefully enable BCS to recruit a new member of staff to the team after the secondment period.

The Service Manager is clearly aware of the need to develop and adapt the establishment to reflect changing demands and to support and improve the service. It is understood a re-structure has been proposed which will see the replacement of the Team Manager and Principal BCS roles with three focussed Principal BCS level posts, this is in addition to the recent creation and appointment of a new Business and Marketing Manager role. The Service Manager is intending to further review staffing, due to the loss of a Senior BCO, in the new year.

All the surveying staff are within a professional body, either RICS, CABE or CIOB, most have full membership, however some have associate or graduate membership.

The Service Manager is professionally qualified, very experienced and unsurprisingly fulfils a key role in the delivery of the building control service – the Interim AD considers him to be very proficient and a 'safe pair of hands'.

LABC has developed a range of formal qualifications (see Appendix 4) ranging from a Level 3 Certificate for technical support staff through to Level 6 Certificates in a range of specialist areas, together with a BSc Hons Degree in Building Control in partnership with the University of Wolverhampton.

It is encouraging to note that BCS are supporting team members continued learning and development by sponsoring them to undertake a range of qualifications, including LABC's Level 4 or Level 5 diplomas in Building Control and the Public Service Building Control degree, in addition to other important training, in matters such as dealing with dangerous structures.

The training and developing of staff is key to ensuring they feel invested and can undertake their roles as effectively as possible.

This is particularly important since the 'registration' of the building control profession is due to be established under the newly created Building Safety Regulator sometime in 2023.

The registration, as outlined in (H6 - Competencies) will require all building control professionals to validate their competency through a formal assessment approved by the Building Safety Regulator. Building Control is to become a registered profession, unlike any other local authority position, with perhaps the exception of some legal and social work positions.

Anyone who has not validated their competency at the requisite level and is on the 'register' will not be able to practice, which in turn would leave Wokingham and West Berkshire councils unable to fulfil their statutory functions. It should be noted this is not only applicable to those working on Higher Risk Buildings (HRB's) but to all levels of building control surveyor, covering all types of work.

For the building control surveyors to be able to sit and pass the validation assessment, they will need to demonstrate the necessary experience of checking and inspecting the type of work they are looking to gain registration for, and it is critical that management ensure suitable coaching, mentoring and support is given to ensure they can develop their knowledge and experience in a safe environment.

### **Recommendations**

- 12. To put in place a plan to facilitate the registration of all building control staff, to ensure BCS can continue to fulfil its statutory functions, on behalf of Wokingham and West Berkshire councils, following the introduction of building control profession register.**
- 13. Once the new structure is in place, the Service Manager establishes a new regime for engaging with staff to ensure more effective working relations.**

## H.6 Competencies

Following on from the tragic events at Grenfell Tower on the 14<sup>th</sup> June 2017 and the subsequent report by Dame Judith Hackitt (Building a Safer Future – Independent Review of Building Regulations and Fire Safety: Final Report) a clear message has been delivered to the construction and fire safety sectors - that all key professionals must demonstrate their competency. It will no longer be acceptable to rely on qualifications (which could have been gained many years earlier) as a way of proving competency. It will require regular validation and on-going requirements for continuous professional development and proof of application of learning. As one of the key professions identified within Dame Judith's report, Building Control will be expected to ensure all staff working on in-scope buildings are competent. In fact, under the new Building Safety Regulator (BSR) – within the HSE - the requirement for proven competency is to be extended to all levels of surveyor, so local authorities will have to ensure the competency of staff matches their work profile.

The BSR has confirmed the registers, for building inspectors (local authority surveyors) and building control approvers (currently known as approved inspectors) will open in October 2023 and the requirements relating to registration will become enforceable, by the BSR in April 2024. Essentially, any surveyor who undertakes restricted activities (plan vetting and site inspections) and/or restricted functions (decision notices, etc.) will have to be on the register, essentially meaning they will be registered and 'licensed to practice'.

LABC, through a newly formed public interest company (the Building Safety Competence Foundation), has developed and rolled out formal validation assessments for domestic, general and specialist surveyors. These validations are available for both public and private sector building control bodies and have been designed to accord with the requirements, as they stand, of the Building Safety Regulator, to enable registration, subject to any other matters still to be determined by the Regulator.

Due to the burden to be placed on local authorities, in relation to supporting the Building Safety Regulator on HRB's, government accepted a bid by LABC for New Burdens funding and LABC has established the training requirements of every building control surveyor working in local authorities in terms of learning (formal qualifications) and validations (assessments of competence) – all the associated costs are being covered.

The LABC Board of Directors also agreed to fund learning and validations for local authority building control teams who work in areas where there are no HRB's – supporting local authorities and readying them for the registration of the profession.

The Service Manager has undertaken an informal assessment of the competencies of the team (see Table 1 below). The two surveyors deemed competent at Level 6 have taken the BSCF validation, unfortunately both were unsuccessful, it is hoped they are being provided with suitable support to enable them to re-sit another validation assessment in the coming months.

BCS currently have ten surveyors undertaking formal learning and these will be able to take the appropriate validation assessment when they are ready to do so, with the New Burdens funding.

There is a good mix of abilities within the team which should enable the Service Manager and Area Manager to effectively organise the oversight of the full range of projects.

The perceived level of competency (which will require validating) within the team is adequate, in terms of the work profile, and resourcing levels appear reasonable (see section H.10), however it is noted vacancies exist on the establishment for a senior building control surveyor and building control surveyor.

Training records were made available as part of the information gathering process, it seems clear staff are provided with access to a range of training, from service specific to mandatory and corporate topics.

It is understood training requirements are generally discussed and agreed as part of the corporate appraisal process, to support corporate objectives and facilitate personal development, all relevant details are saved to the employees personal file within the 'Business World On System' and logged in the training 'tracker'.

Ensuring personal and professional development of staff is a key responsibility of management and will be critical when professional registration is in place. The Service Manager has systems in place to facilitate training and development, however there may be issues regards the support some staff receive to complement their learning. It was also mentioned that training is not encouraged, this seems at odds with the information gathered and it may be communication around training opportunities and support needs to be improved.

Staff also have a responsibility themselves and employers should facilitate this to ensure their employees have demonstrated the ability and competence to deal with the work they undertake, to ensure works within West Berkshire and Wokingham meet regulatory requirements.

All staff will need to undertake a certain amount of training to maintain their competency levels and so team members should be provided with opportunities for continuous professional development (CPD). As has already been noted, many members of the team are currently undertaking formal learning, which will count towards CPD.

When asked whether staff feel qualified and experienced to undertake the role expected of them, most did agree but not all, this may be because of the limited years of experience of some staff, this is something that should be further explored, and appropriate measures put in place to ensure all staff feel able to undertake their job roles.

Many local authorities building control teams regularly arrange and participate in manufacturer's technical seminars, these are now typically delivered virtually which has resulted in greater numbers of attendees.

These sessions are typically focussed on pertinent topics and aligned to the training needs identified during the appraisal process, they can provide extremely useful training, as well as an opportunity for networking, it is understood BCS have not arranged any such events recently, likely due to work pressures.

There is a whole chain of regulatory changes being brought forward as part of the requirements under the Building Safety Act 2022, as already mentioned, this will include the requirement for all building control surveyors to be registered, to practice.

As has already been mentioned, the Building Safety Regulator will have responsibility for the oversight of all building control professionals in terms of their competency, ensuring building control teams have appropriate levels of competency to perform their roles.

In addition to this, there will be a range of operational standards rules, to which all building control bodies will be expected to work within.

These operational standards will include several broad themes including:

- Systems and controls
- Risk management
- People
- Building Control functions
- Enforcement and intervention activity

A range of key performance indicators (KPI's) will be established to monitor performance against the themes outlined above, with a view to gathering quality data to ensure building control bodies are operating efficiently and effectively and delivering their intended purpose.

The KPI's are likely to focus on broad themes, such as:

- Building Control professional knowledge and expertise
- Systems and controls
- Complaints handling and appeals
- Building Control functions
- LA enforcement
- Risk prioritisation

It should be noted the Building Safety Regulator will have the power to intervene in cases where Building Control Bodies (including local authorities) are failing to meet requisite standards, these are scheduled to 'go live' in April 2023.

The Building Control team at BCS currently have a good level of experience for both domestic and other non-domestic work and has a reasonable level of resilience to cover during periods of absence.

Focus has been given to surveyor competence, which is of course critical, however, it is also important to ensure that those undertaking technical support for Building Control also have sufficient competence, skills, and experience.

BCS has a dedicated support team of five, although at present a technical support officer post is vacant.

The team members have a varied level of experience, and it is encouraging to note two member of the team successfully completed the Level 3 Certificate – Technical Support for Public Standards Building Control, unfortunately one of the officers left the service in April 2022.

The Building Control Manager has undertaken an informal assessment of staff competency levels, see Table 1 below.

It is assumed competencies have been evaluated using the 'model' developed by LABC, this sets out the criteria to be achieved for various 'levels' of surveyor, once assessed and recorded. This should be related to work allocated to each of the surveyors and support staff in the context of:

- Existing work
- Future business planning
- Future team profile



Domestic applications make up on average around 92% of all applications received by the Building Control team, so it is considered reasonable to assume that the Building Control Surveyors have more than the necessary competency levels to effectively deal with the work being submitted, based on the informal assessment of their competency by the Service Manager.

Based on the above, and to reiterate the point already made, there is capacity and capability in the team, to deal with the range of schemes received, however this may be compromised during periods of staff absence.

***Recommendations***

- 14. The Service Manager should arrange for training, mentoring and support to be discussed with the whole team and take appropriate action to address any concerns raised.***
- 15. Whole team training be combined with team meetings.***

**Table 1. Competency Profile – using the LABC model.**

<b>Competency Level</b>	<b>Name &amp; Job Title</b>	<b>Dangerous Structures call out?</b>
<b>Level 6a</b> Surveyor with specialist skills such as Safety at Sports Grounds, HTM and High-Risk Buildings	Roger Paine (Service Manager)	
<b>Level 6</b> Surveyor with proven capability to work unsupervised on higher risk/complex buildings	Gareth Sexton (Principle BCS) Sara Hiscox (Team Manager)	Office hours only
<b>Level 5a</b> Surveyor with proven capability to work unsupervised on non-domestic low risk buildings	Warren Woodham (BCS) Charles Bradshaw (BCS)	Office hours only
<b>Level 5</b> Surveyor with proven capability to work unsupervised on domestic projects and with supervision on non-domestic low-risk buildings	Lorraine Kenny (BCS) Hannah Campbell (BCS)	Office hours only
<b>Level 4a</b> Surveyor with proven capability to work without supervision on domestic projects	Dan Cheeseman (BCS) Rohan Kumar (BCS) Sam Whitlock (BCS) Lokendra Chemjong (BCS)	Office hours only
<b>Level 4</b> Surveyor working with supervision on domestic projects		
<b>Level 3</b> Building Control Technical Support Staff	Lisa Alder (Business & Marketing Manager) Natasha Mace (Senior Tech Support) Rebecca Alder (Tech Support) Laura Palmer (Tech Support)	N/A

## H.7 Morale within the Building Control team

Based on the results from the confidential staff survey, it appears most people do not consider morale to be good within the building control team, giving reasons such as:

- moving of staff and their working areas
- perception of lack of backing from management and for the shared service generally
- high workloads

One person expressed the view that people were under stress trying to keep up with workloads, which was creating unhappiness and low morale.

During the stakeholder interviews slightly different views were expressed, which could be because group interviews were held (people may have been less likely to be candid) or it could be indicative of an improving situation.

The support team consider themselves able to work well together and confirmed they kept in contact with one another daily, through Microsoft Teams, which they found beneficial.

Some of the surveying staff meet up regularly although this is not consistent and the view was a more structured approach would be beneficial and would likely improve morale, indeed there appears to be an appetite for the whole team to get together, which it is understood occurred pre-COVID.

It would be an interesting exercise to explore why the team do not consider morale to be good, but we know that numerous factors can influence the way the team feel.

Here is a list of factors which could be influencing the team at BCS:

- Lack of understanding and empathy for the service – while it is appreciated the Interim AD is trying hard to be involved there is a perception that no one is really interested above this level.
- There is a perception no one really cares about the service or appreciates it's importance
- There is a belief that the role is not valued corporately
- The fact the team have been waiting for a long-term commitment by both authority's since September 2019.

When asked in the confidential survey about the main improvements that could be made within Building Control, resourcing was an issue, particularly in terms of ensuring consistency of staff working assigned areas. Another theme was office space – it appears some feel this lack of physical presence is impacting on the team in terms of relationship building and adversely affects how the team is 'connected' to the authorities they serve. A lack of identity is an issue raised by senior management, which is covered later in the report.

While most staff feel valued by Building Control management, some do not, and this may be down to a perceived lack of effective communication. It is encouraging to note some staff feel the Service Manager offers them a great deal of support, although others feel a little isolated, no doubt exacerbated because of the COVID pandemic. Most staff do not feel valued corporately, the remainder did not express an opinion either way.

### **Recommendations**

- 16. Consideration be given to ways of improving communication, including the potential for regular face-to-face team meetings (see also recommendation 12).**
- 17. Management actively engages with the Building Control team, creating a representative task group, to explore the factors affecting morale and works to resolve any issues raised.**

## **H.8 Public Protection - Dangerous structures**

Local authorities (outside London) have a duty, under the provisions of the Building Act 1984, to deal with dangerous structures. Anyone dealing with dangerous structures on behalf of a local authority should be given delegated authority, through the Council's scheme of delegation. It is noted from Wokingham's Scheme of Delegation that these functions are delegated to the Director of Place and Growth, who is then authorised to further delegate to a named officer. It is not clear whether building control functions have been formally delegated to the Service Manager and his staff, as appropriate.

BCS respond to, on average, just over 60 dangerous structure callouts per year, equating to more than one per week. Historically Wokingham provided an out-of-hours response, unfortunately this ceased in 2021 due to lack of contractor support, it is understood West Berkshire did not have a 'duty system' but were keen to see the provision extended.

At present calls/notifications of alleged dangerous structures, received during office hours, are assessed prior to allocation to the area surveyor and should attendance at an incident extend beyond office hours over-time payments are made.

Where incidents are reported out-of-hours, to either authority, it is understood the call would be taken by a duty manager and where necessary highways would fence off or close roads as appropriate and building control would visit the following morning to further assess the situation and arrange any other necessary remedial works.

It is important that a sufficiently robust 'triage' system be in place to ensure an effective response to dangerous structure notifications.

It is understood that the Service Manager is currently engaging with West Berkshire's highways team to better understand the support which is currently available from that service and is planning to undertake a similar piece of work with the highways team in Wokingham.

If a timely response were not provided to reported incidents of dangerous buildings, it is possible unnecessary additional risks could be placed on the public which may lead to injury, damage the reputation of the local authority and the trust residents and businesses have in it.

It was noted, during the audit, that the record keeping in relation to dangerous structures was very good, with lots of contemporaneous notes, although an Opportunity for Improvement (OFI) was noted in terms of closing files once the danger is removed. This was actioned immediately, with all relevant staff requested to check and update all records.

### **Recommendation**

- 18. A review of the BCS dangerous structures service provision be undertaken and presented to Wokingham and West Berkshire councils to determine if it satisfies their statutory duties and corporate objectives**

## **H.9 Proportion of work undertaken by BCS**

In 2021/22, BCS dealt with around 54% of all notifiable building work in the borough (based on application numbers – and excluding works done through Competent Persons Schemes) – this is slightly more than the previous year but significantly less than the 60% achieved in 2019/20. This is lower than the national average of around 67% and similar to the average for neighbouring authorities, which is around 56%. This is likely to be largely down to the loss of experienced staff to local approved inspectors and the presence of national and regional approved inspector offices and headquarters adjacent the area BCS operates.

The overall level of building control activity in Wokingham and West Berkshire between 2019/20 and 2021/22 has been relatively stable, with only a 5% decline in overall application numbers, however BCS has received a smaller proportion of these applications, down by around 15%.

The overall reduction in application numbers has unsurprisingly led to a corresponding reduction in income, from £1,610,779 in 2019/20 to £1,381,175 in 2021/22.

It should be noted that the withdrawal of the RBMW from the shared service in June 2021 will naturally impact on application numbers and subsequently income levels.

Many local authorities have built up professional relationships with their local agents, BCS is no different and they appear to have some good long-standing relationships. Under the LABC Partner Authority Scheme (PAS), local authorities can offer a plan appraisal service for schemes outside their own council boundaries, typically for their local agents. The Service Manager provided a list of their partner clients (30 in total) which are predominantly architects or plan drawers, having checked LABC's records it appears only 28 partners are formally registered through the PAS, it is suggested that contact be made with CC Associates Ltd and Ardgowan Homes Ltd to arrange for formal sign-up to the PAS. It is not known how many of these are active, however it is likely many are not since the partnering arrangement has only generated around £6,000 in additional income over the past three years, indeed last year the income was only £342. The reason for the decline in work through the PAS is not known. It is suggested this is an area that requires some attention and may have the potential to be developed, subject to adequate resourcing.

The team is aware of the competitive environment in which they operate, and the fact Initial Notices are on the increase. The team certainly do not feel pressured into accepting lesser standards to win work; indeed, their focus is clearly to help ensure regulatory compliance is achieved. The planned restructure will facilitate greater focus on partnering which should no doubt enable the team to better compete with private sector providers.

Commentary has already been provided on projects undertaken by WBDC and the Wokingham Housing Company being dealt with by approved inspectors, this too would have an adverse impact on income levels. It is difficult to appreciate the sense of using an outside contractors for work the council have in-house specialists to deal with. This would not only save both council's money but would give them far more control on the quality of the built environment.

Austerity measures and other factors imposed on local authorities have led many to exert pressure on fee earning services, such as Building Control, to generate surpluses for the general fund. This does not necessarily appear to be the case at BCS, the Service Manager regularly reviews charges, however, there has only been an increase of around 5% over the past three years. It is understood a 7% increase in fees is proposed for 2023/24 (subject to member approval).

It should be noted that, a local authority building control service is only expected to recover the costs associated with undertaking 'chargeable functions' (primarily plan examination and site inspection works) and that any proposal to consistently generate surpluses (which are not intended to be reinvested in the service), are not in accordance with principles of the Building (Local Authority Charges) Regulations 2010 (see section H.11). This position is stated in the BCS Business Plan.

BCS deal with, on average, 8 regularisation applications and 3 cases of notified unauthorised works per month, which is comparable with other authorities of a similar size.

### **Recommendations**

- 19. A review and refresh of the existing partner client list be undertaken, and consideration be given to explore ways to increase the number of active partner clients.***
- 20. To develop ways to gather feedback from clients who choose to use Approved Inspectors, to help determine any service improvements/changes required to secure future work.***
- 21. That all local authorities within the shared service look to procure BCS for any in-house projects.***

## H.10 Staff utilisation

The staff at BCS are performing very well when compared to other local authority building control teams, in fact their productivity levels, may suggest they are being pressed a little too hard and this is likely to be a key reason why plan checking support (through an agency consultant surveyor) has been in place since January 2022.

In a recent survey the average number of applications (Full Plans/Building Notice/Regularisation) dealt with by a surveyor each year was around 160, BCS surveyors deal with around 210, this is 30% more than the average. This is likely to be a contributory factor to the perceived concerns in relation to workload and stress.

Obviously there are many factors which could impact on these figures:

### Application numbers

- Type and complexity of work
- Other statutory work undertaken by the building control team (dangerous structures, enforcement, scaffolding and hoardings, etc)
- Quality of builders
- Level of service provided

In terms of Full Plans applications, which require technical assessment and a formal decision, BCS receive in the region of 1200 per year. If these were evenly spread between officers, this would equate to around 2.5 plan checks per week, which would be considered reasonable, however the complexity of the project and the fact certain officers undertake other work means this is not the case. As noted in H4 above, BCS have up until recently used the service of a contract surveyor to undertake the large proportion of plan checking, enabling establishment staff to concentrate on site inspections.

A KPI target has been set for checking 70% of submitted plans within 15 days, this target has consistently been met and exceeded, in fact since 2019 around 79% of all Full Plans applications have been checked within this period. It is also noted that the average time to check plans within 10 days is around 38%. These plan turnaround times are considered reasonable and not untypical across the local authority building control network and are at a commercially acceptable level.

It is understood that a decision is made on all full plans applications within the statutory two-month period.

It should be noted that in accordance with the Building (Local Authority Charges) Regulations 2010, plan checking fees on applications not decided within the statutory period should be returned and the application deemed approved.

From the information provided, it appears BCS undertakes in the region of 12,600 inspection (sites - not plots) per year – this equates to roughly 6.5 inspections per day, the average number (as noted in a recent LABC survey) is around 4.5. This higher figure is likely to have been facilitated by the strain taken off the surveying team in relation to plan checking.

Certain factors will impact on the number of inspections officers are able to undertake:

## Inspections

- Location – urban/suburban/rural
- Geographical area covered
- Complexity of work undertaken
- Quality and experience of builders working in the area
- Extent of mentoring which takes place.
- Distribution of work and management of inspections
- Other duties undertaken by building control staff

The level of work is relatively high (bearing in mind the current training commitments) but manageable, however this does not consider the time taken by the surveyors in dealing with statutory non-chargeable works, such as notified unauthorised works (avg' 27 p/a), regularisation applications (avg' 108 p/a), works of demolition (avg' 65 p/a) and dangerous structure callouts (avg' 60 p/a), as well as non-statutory non-fee earning work such as giving general advice. It also does not account for annual leave and other absences, which would impact the workload for the surveyor and technical support teams left to manage the workload across the shared service.

Application numbers (Full Plans/Building Notices) have declined since 2019/20, however the number of initial notices received from private sector building control providers has increased, which suggests construction activity is relatively static across the Wokingham and West Berkshire regions.

The Service Manager has overall control of the BCS operation and works with the Business and Marketing Manager, Team Manager and Principal BCO on day-to-day operational functions to ensure service delivery is maintained.

As BCS receives around 54% of all applications, it can be presumed that the private sector market is well established and successful as is the case in other areas, likely to be down to a combination of factors, including geography, professional relationships (including the two ex-BCS senior surveyors now working for local approved inspectors) and the level of service being provided.

Domestic applications account for around 92% of BCS's work profile. Whilst Approved Inspectors only take a small amount of the market share, proportionally they may generate more income from non-domestic type applications which are often the most interesting (and profitable) schemes.

Under the new regulatory regime, local authority building control will generally provide the building control support to the regulator for in-scope buildings (there are around 10 HRB's in the BCS area), this is likely to lead to increased competition for the domestic building control work from Approved Inspectors having to extend their geographical areas to compensate for the work lost under the new Building Safety Regime.

While the above information gives an indication of workload, the current and on-going social and economic situation, caused by the Covid-19 pandemic and economic downturn may lead to a change taking place, although there are differing views on this. Some suggest speculative new housing will slow and commercial schemes will be virtually non-existent, while others believe there will be a strong bounce-back in the coming years.



Existing homeowners may still be reluctant to move, but experience of previous downturns show after a short period those who feel secure in their employment may decide to extend their homes. This will either maintain the typical high levels of domestic work or there could even be an increase (bearing in mind the above in relation to increased competition for this work).

At present it appears the current staffing levels (due to vacancies) are making it difficult for the team to deal effectively with their workloads which is creating stresses, this will be exacerbated with the departure of one of the Senior BCO's. It should be noted that the 'buddying' system was put in place to enable better support for all staff and develop working relationships within the surveying team.

## H.11 Financial Management

The Service Manager has responsibility for oversight of building control budgets, and it is understood meetings are held, with the Finance Business Partners, monthly to discuss forecasting, budget setting and monitoring. The Service Manager advised that there had been quite a few changes in personnel supporting building control in recent times and this hasn't helped.

The Service Manager has talked through the requirements of the Building (Local Authority Charges) Regulations 2010 and the CIPFA Accountancy guide with both Business Finance Partners, so it is hoped better understanding and effective working relationships will be developed.

The Finance Business Partner stated the Service Managers opinion was sought on budgets, however the Service Manager feels he has a sub-ordinate relationship with finance, with little in the way of conversation about staffing costs, re-charges, etc taking place.

Building Control fees are reviewed on an annual basis, and it is assumed increases made to various work categories, to achieve the overriding principle of cost recovery under the provisions of the Building (Local Authority) Charges Regulations 2010.

A timesheet-based exercise was undertaken when the shared service increased from a two-way to three-way service. This established a 'split' between chargeable and non-chargeable activities of 83/17 respectively. A further mini-review was undertaken in 2019 which resulted in a similar split being agreed by all partners.

Despite the Service Manager being reasonably happy with the calculation of the 'split' there remains some concern about how costs are apportioned, with the perception that what building control is paying is unreasonable. The apportionment between chargeable and non-chargeable functions (based on employees' salaries) is considered reasonably high, many authorities have a 'split' of around 75/25, however it is assumed this reflects the time spent on statutory non-chargeable activities.

The apportionment of central and support service charges is around 14% of the total expenditure on the chargeable account, which is considered reasonable.

Under the provisions of The Building (Local Authority Charges) Regulations 2010, (Regulation 6) the local authority should prepare a financial statement and publish this not more than six months after the end of the financial year to which the statement relates.

During research, for the review, it was noted BCS did not produce and publish its own financial statement for the service. Following a review of Wokingham and West Berkshire's published financial statements it appears Wokingham only publish details relating to its element of the building control shared service while West Berkshire do not refer to their building control service at all.

The Service Manager understood the statements (for BCS as a whole) were prepared and published by Finance, although he had never checked, however this does not appear to be the case.

It is understood the Service Manager is checking the situation regards publication of the BCS financial statement with the Business Finance Partner.

Under the Building (Local Authority Charges) Regulations 2010, the financial statement needs to be signed off by the Chief Finance Officer, under Section 151 of the Local Government Act 1972, this is indicated on the published statement.

During the stakeholder interviews discussions were held with both Business Finance Managers who support the building control service. Both are reasonably familiar with charges legislation and CIPFA guidance relating to the building control service, although Richard White has only been supporting building control since March 2022.

When asked about any concerns with the building control service, the issue of debt collection was mentioned. Apparently the debt recovery mechanism needs improvement, at present there is a relatively large amount of outstanding debt. Consideration is being given to the best way to resolve this issue, potentially by writing off the debt, although it is not clear if this would come out of the BCS reserve if sufficient funds are available in any case.

It can be seen in Table 2 below, that the central support service charges for BCS have decreased by around 37% between 2019/20 and 2021/22, it is presumed this is due to the Royal Borough of Windsor & Maidenhead (RBWM) moving out of the shared service. On average the support service charge equates to around 15% of the income. This equates to around £8,300 per staff member (based on 15no FTE), which is considered reasonable. From a recent survey of authorities the average support service charge was around £12,500, the lowest being £2,900 and the highest set at £22,900. This range emphasises how the apportionment of charges can vary massively. It is not possible to comment on the 'fairness' or accuracy of the central support charges, however this should be routinely 'tested'.

**Table 2. Building Control Chargeable Fee Earning Account – BC Solutions - Key Facts**

Year	Building Reg apps	Initial Notices received	Proportion of applications %	Employee costs £	Central Support Service Charges £	Income £	Total service expenditure £
2019/20	2371	1611	60	1,252,468	244,312	1,611,534	1,622,244
2020/21	1958	1760	53	1,098,715	212,666	1,381,175	1,449,777
2021/22	2006	1721	54	831,469	154,500	1,085,826	1,071,714

\* these figures include the charge levied by WBDC which is budgeted for in a separate heading.

While commentary is given in this review on the current financial arrangements, it should be noted that under the new regulatory regime, the Building Safety Regulator (BSR) will have oversight of building control bodies and it may be necessary to review hourly rates, to reflect the additional costs associated with developing and maintaining relevant competencies. The BSR recently asked authorities to confirm the hourly rate they would charge for supporting the new regime on in-scope buildings. This piece of work has been done and the BSR has notified of BCS's hourly rate (£65.56).

#### **(a) Income & Charges**

The Building Control service generates an average income of around £1, 534,000 (based on the outturn figures for 2019/2020 – 2021/22) which when considering the resources currently deployed equates to around £153,000 per FTE surveyor, which is considered excellent, based on a recent survey across a range of authority types which indicated an average of £81,000. This may indicate staff are currently very stretched, in terms of workload.

The average price per application at BCS is around £740 (based on the last three years figures), this is not untypical in similar authorities.

Having reviewed the charges schemes for some neighbouring authorities, it appears BCS charges are relatively comparable, for example BCS charge £830.00 for an extension between 10m<sup>2</sup> – 40m<sup>2</sup> and the average charge from neighbouring authorities is £784.00. It should be noted that charges should be based on accurate information regarding the cost of delivering the chargeable functions.

#### **(b) Setting of Charges**

The Building (Local Authority Charges) Regulations 2010 state that a local authority should conduct a review of the level of charges set on an annual basis, to ensure, taking one financial year with another, the income derived by the authority performing chargeable functions and providing chargeable advice, as nearly as possible equates to the costs incurred by the authority in performing the chargeable functions and providing chargeable advice.

The current chargeable functions, under the Building (Local Authority Charges) Regulations 2010 are:

- Passing or rejection of plans, deposited in accordance with Section 16 of the Building Act
- Inspection of building work for which plans have been deposited in accordance with the Building Regulations 2010 (as amended) and with Section 16 of the Building Act
- The consideration of a building notice which has been given in accordance with the Building Regulations 2010 (as amended)
- The consideration of work reverting to local authority control under the Building (Approved Inspector etc.) Regulations 2010 (as amended)
- The consideration of an application under Regulation 18 of the Building Regulations 2010 (as amended) and the inspection of any work to which the application relates.

The current Building Control charges were introduced on 1<sup>st</sup> April 2022.

### **(c) Budgeting & Accounts**

The fee split of 83/17 for the fee earning/non-fee earning accounts has been in place at BCS since 2018. It should be noted that the fee earning/non-fee earning split for any Building Control service may vary and change over time. It is dependent on many factors, including the number of Initial Notices received from Approved Inspectors, the number of reported dangerous structures and enforcement cases actioned, together with the volume of notifications from Competent Persons Scheme providers and whether the authority has responsibilities for Safety at Sports Grounds.

The CIPFA Local Authority Building Control Accounting Guidance for England and Wales 2010, clearly sets out the Principles of The Building (Local Authority Charges) Regulations 2010 and gives guidance on expenditure, charging methodology, monitoring and governance, management information and a fully worked example for allocation and apportionment of costs.

It is understood that the budgeted income figure remained unaltered from 2019/20 through to 2021/22, despite the fact outturn figures did not support this and RBWM left the shared service arrangement in June 2021. Setting unrealistic budgeted income targets for BCS only puts pressure on the service and should be avoided.

BCS operate a 'rolling balance' with a year-on-year surplus/deficit indicated in their outturn reports.

In 2017/18 reserves stood at £170,998, however in subsequent years this reserve has reduced significantly and currently stands at £72,107. It is understood the reserve was reduced in 2017/18 to pay for the service transformation project agreed with the Building Control Board.

While a surplus is helpful, since this enables service improvements to be made, a consistent high level of surplus may suggest the service is not achieve the overriding objective of the Charges Regulations.

Adjustments have had to be made to the financial accounting and budgeting for BCS following RBWM leaving the shared service arrangement, this has led to a proportionate reduction in income and expenditure level, and it is encouraging to note a surplus of just over £14,000 was achieved in 2021/22.

## **Recommendations**

- 22. The Service Manager and Business Finance Partner work collaboratively to ensure accurate budget setting and re-charges apportionment.**
- 23. Clarification be sought on the most appropriate method of publishing BCS's financial statement by Wokingham and West Berkshire councils.**
- 24. All internal recharges to be reviewed to ensure BCS is only paying for services it receives**
- 25. Consider a 'what if' plan should the reserve be exhausted**

## **H.12 Systems, Infrastructure & Processes**

### **IT System**

BCS operate using Tascomi/iDOX Cloud, internet-based software as its single IT system for both its data and document management systems. It is understood that all relevant data has been migrated into this system from West Berkshire and all data, post 2019 from Wokingham. Any historical data, pre 2019, from Wokingham is accessible via a separate IT drive on the existing system at Wokingham, which all staff have access to.

All surveyors now work remotely and are provided with Microsoft Pro tablets and smart phones which enables them to access, view and record details and update records while on site and viewing of 'real-time' inspections booked through Tascomi.

It is understood that many builders use the website to book inspections, which is considered positive. Inspections can be taken over the phone, although this does not appear to be encouraged by the support team, unless the website is down. It would be quite frustrating for a builder who has contacted the support team to be turned away and guided to the website to book an inspection – it is suggested that in these instances the inspection booking is taken.

Anecdotal evidence suggests many calls and messages to the surveying staff are not answered, which may at times mean the support team end up taking the brunt of customers frustrations. It is not clear how unanswered messages contained within the diary are managed.

Mention has already been made about the issues around debt collection, it is understood the Service Manager is working with Tascomi/iDOX, with a view to using their portal for both on-line submissions and payment which will hopefully eliminate these issues and lead to valuable resource savings in relation to data inputting.

Payments can be taken over the phone and while this approach was very popular, it is resource intensive in terms of taking and returning calls and this is one of the reasons BCS has focussed on the on-line approach.

Another reason for on-line application submission and payment is to support the team to work from home since they are not able to take hard copy applications or cheque payments.

Self-service, when set up and operating well, can bring about resource savings, enabling staff to concentrate on other areas of work and provide customers with the flexibility to transact at a time convenient for them.

Overall the IT set up, for both the surveyors and support team, appears to be working reasonably well, although some comments were received about improvements that could be made, for example:

- the existing phone system to aid with contacting the surveyors and technical support team.
- Teams chat – how better use can be made of this by all staff

### **Administration**

As has already been mentioned, the support team typically work from work. Arrangements were for six desks to be made available on the second floor of the Council offices, to enable the support team to work from there a couple of days a week, however it was recently announced that Wokingham will close the first and second floors at Shute End, to make cost savings. The provision for hot-desking for staff will exist within the ground and lower ground floors. Because of the lack of a defined space for building control, it is likely the support team will primarily work from home and only attend the office when necessary, for example, when scanning of incoming hard copy details is needed.

All applications are registered and validated by the support team, who also undertake sewer checks and all notices from approved inspectors are checked before being validated and the requisite decision is made. All correspondence is saved electronically onto Tascomi, and work is allocated by the support team across the area teams.

The full range of tasks are undertaken by each member of the support team, except for invoicing, which is currently being carried out by the Business & Marketing Manager.

Inspections requests are predominantly made on-line and processed by the support team. It is understood an automated message is sent back to the client/builder (person making the inspection request) to advise them that an inspection will be made between 8:30am – 3:30pm on the day requested. When an inspection cannot be made on the day required, it is understood the support team will contact the client/builder direct. Contact numbers are provided on the BCS website, should the client/builder need to speak with the surveyors/support team.

Anecdotally, it is understood that abortive inspections occur at times, simply because the builder doesn't know the surveyor will be calling out – this seems at odds with the paragraph above.

The support team consider themselves to be performing well and this is borne out by the recent BSI and LABC audits, where no significant non-conformances were noted regards performance against agreed processes and procedures and the improving trend data on the KPI's they work to.

In 2020 around 94% of all applications were registered within three days of receipt, set against the target of 75%, while the most recent data shows performance levels now at 99%.

The target for issuing of completion certificates within five days is set at 85%, in 2020 performance levels were around 89%, these currently stand at around 98%.

Generally, all aspects of work appear to be being undertaken in accordance with appropriate procedures and within the agreed timeframes. The only area where a backlog exists is invoicing for site inspections, for which the long-term absence of a member of the support team is a contributory factor (the Building and Marketing Manager has had to help with day-to-day activities). It is understood a temporary solution is being explored with Wokingham's IT team, with a view to a long-term solution with Tascomi.

Issues with communication lines have been raised previously in this report, some of the issues may well be down to how the IT is set up and other aspects may well be because of the perceived roles and responsibilities for certain tasks, for example the triaging of calls prior to these being put through to the surveyors for a response. It is suggested that these and other related issues could be dealt with in group discussions with all the BCS team.

### **Mobile/home working**

Prior to the outbreak of Covid-19 in early 2020 staff were office based, although surveyors did have the capability to work remotely. During the pandemic it is understood that the building control office was taken over by Wokingham's IT team.

During the stakeholder interviews it was noted that staff felt home working was working well, the surveyors consider the equipment they have access to, to be very good and while 'live connectivity' to the back-office system would improve the provision, they generally have no issues.

### **Telephony System**

BCS operate a separate telephony system from those adopted by Wokingham and West Berkshire. It was noted that good links are provided to the BCS website (and contact number) from both council's main web sites.

Unlike most corporate telephony systems which typically have an extensive list of options and commentary on data protection, BCS has a simple automated message when someone calls (0300 790 0580), advising the caller that *"a member of the support team will answer their call as soon as they become available"*.

The experience during the 'secret shopper' exercise was excellent, with calls answered promptly and calls returned, when messages were left, in a timely manner.

The inability to contact building control at times will frustrate clients, it is known from research undertaken by and on behalf of LABC, that the biggest issue clients have with the local authority building control service is the inability to contact staff - it is known many will not be willing to wait and will therefore seek the services of an alternative (private) provider, so having and maintaining such a responsive service is considered a real positive.

## **Complaints Handling**

Details were provided of the complaints received by the Place & Growth Directorate at Wokingham, together with the corporate Complaint Recording Information form and the Complaints Log Register used by BCS to manage the complaints they receive.

Both councils have a corporate complaints procedure with on-line forms which appear simple and straight forward to complete. An attempt was made to follow the process on West Berkshire's – 'Complain about a Council Service'. It was noted that bot functionality is provided, which is helpful, however the link to 'Building Control Solutions' page did not work.

The Complaints Log Register lists amongst other things - all the complaints received since 2017, with the complainant details, the root cause and status of the complaint.

On average, BCS receives around 8 complaints per year, although it should be noted only two complaints have been received in 2022. This average is higher than usual, based on the reviews LABC has undertaken, however this may be attributable to various factors, including the fact an effective log register is in place. Most complaints can be attributed to dissatisfaction with the service, in particular a lack of responsiveness.

It was noted several complaints remain open/pending, it is not clear what processes are in place to review and action long-standing complaints.

No mention about Wokingham's and West Berkshire's complaints procedures are included on the BCS website.

## **Website, Social Media Platforms and Apps**

Web sites form an important part of the service offering, with many people browsing sites for information prior to submitting applications. A review of BCS's web site can be found, together with suggested improvements, in Appendix 2, as well as commentary in Section I – Professional Engagement Review.

BCS's does not have any presence on social media platforms such as Facebook, LinkedIn or Twitter, although it is understood accounts have been set up, these have not been activated due to a lack of marketing resource.

Many local authorities successfully use these and other platforms to promote their service, as well as raise awareness of the critical role they have in relation to consumer and public protection. Establishing a social media presence is something the Building Control team may wish to consider in the future.

LABC have developed an Inspection App that enables clients to request inspections. Notifications are delivered to the building control section enabling appointments to be made. The App has been extremely well received and its use is now widespread throughout the local authority building control network.



**Recommendations**

- 26. The work being currently undertaken by the WBC IT team continues to ensure the perceived lack of responsiveness to calls and emails is resolved***
- 27. That work continues to facilitate on-line submissions and payment through the Tascomi online portal***
- 28. Exploration of how better use can be made of IT and social media for staff engagement.***
- 29. Review of the automated messaging received by clients requesting inspections, to reduce the potential for abortive visits.***
- 30. Regular meetings with surveying and technical support staff be arranged to improve working relationships and enhance operational efficiency.***
- 31. Complaints procedures to be included on the BCS website***
- 32. To consider the use of social media platforms to promote and raise the profile of the building control services for Wokingham and West Berkshire.***
- 33. To explore the use of the LABC Inspection App – to enable another communication channel for builders and improve service delivery.***

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# I. Professional Engagement Review

## I.1 Customer Service and Engagement

Local authority building control has a statutory duty to undertake enforcement of the building regulations, but emphasis is given to undertaking pre-contravention inspections, guiding service users to achieve compliance and thereby avoiding the need to pursue formal enforcement action and thus enabling Building Control to develop and maintain professional working relationships.

Delivery of a good service is a key factor in the success of any business and understanding how the service is perceived by its users is also key.

It is understood that up until recently customer feedback was gathered through the Council's communication team using a link to an on-line survey, however it is now received via the Council's website. It is not clear from an initial search of Wokingham's website where positive feedback can be given.

A 'snapshot' of customer feedback gathered between 2019/21 has been provided as part of the information gathering exercise and it is pleasing to note most of the feedback is positive, with comments such as:

*"really great service, excellent inspectors, quick response"*

*"incredibly polite and efficient, nothing was too much trouble"*

*"excellent service, can't thank you enough for your quick response"*

However, a number of customers were clearly not satisfied, and a theme seems to emerge about the perceived lack of response from members of the BCS team, as highlighted by the comments below:

*"I have been very unhappy with my experience on this occasion, particularly regarding the speed of response, having had to chase multiple times over a 4 month period".*

*"Had absolutely no response to any communications at all between August 2020 and May 2021, which was appalling. Both me and my builder sent many, many emails and other requests over this time and neither of us received any reply".*

*"absolutely disappointed that it took months and months despite constant chasing".*

While most respondents (64%) considered the overall service provided by BCS to be either excellent, very good or good, 36% thought the service was either unsatisfactory or very unsatisfactory. It should be noted the number of responses received represent an incredibly small proportion of the applications dealt with during 2019 – 2020, even so it would make good business sense for all negative comments to be investigated, it is understood positive comments are fed back to the team and testimonials are included on the website, which is great practice.

The Building Control Manager considers the building control team to be doing as well as can be expected, although pressures due to resourcing and training means performance is not at the level he would want it to be.

It is clear from talking to the staff that they are keen to provide a good service, although they consider their performance to be 'not bad' in terms of KPI's. There is a view that there are too many channels of communication (unfortunately this wasn't clearly defined during the stakeholder interviews) which might explain the lack of responsiveness mentioned above. This is an issue that should be explored further.

BCS has no marketing/engagement plan in place at present. The lack of long-term commitment from both partner authority's is considered a key contributory factor. The Service Manager *stated - "the priority to develop one hasn't been there"*. It is however noted that approval has been obtained for a new role within BCS for a Business and Marketing Manager – one of the main accountabilities of the role will be to - contribute to the preparation, review and delivery of the business plan....and improving market competitiveness and the viability of the business. It is encouraging to see the service develop its structure in this way and it is hoped the development and implementation of a marketing strategy (engagement policy), as part of the overall business plan, will lead to increased market share and revenue, whilst delivering regulatory compliance.

It should be noted that any engagement policy should set out a clear vision, centred around maximising opportunities to protect, as well as potentially increasing workload whilst maintaining a cost effective, user-focussed building control service.

Building Control is firmly embedded in the construction industry, which is based predominantly on face-to-face contact and personal relationships (although the Covid-19 pandemic has and continues to have an impact). Part of the policy objectives should be to continue and improve the engagement with customers (applicants, local builders, architects, and agents, etc.) to ensure they are made aware of the distinct benefits of the service.

BSC has a reasonable market share, so it could be assumed it also has a reasonable relationship with their local agents and builders. These relationships need to be maintained and nurtured.

There are several ways this can be done:

- Creating an engagement plan – using LABC resources, including toolkits, standards letters and templates, communications and data.
- CPD and other learning events – face-to-face activities, etc.

Most applications received by BCS are domestic (typical for similar authorities) and it is therefore important to appreciate homeowner awareness of building control is now essentially through digital engagement. It is encouraging to note the BCS website has a link to the LABC website 'Front Door', which provides simple overview information and onward links, aimed at homeowners.

BCS receive most applications electronically, either via email (40%) or on-line (60%).

Customers can currently make payments through links on the Wokingham council website, as has already been mentioned it is proposed for payment to be taken on the Tascomi portal once development works are complete.

BCS like many local authorities building control services, can take payments over the phone (some authorities take more than 30% of their applications in this way). One benefit of providing this service within the building control section is that it enables the application to be 'banked' at the earliest opportunity, reducing the risk of the agent or builder taking the application to a private sector provider, however it is more resource intensive process.

Business customer retention and gaining new business customers relies on face-to-face opportunities, such as CPD, LABC events, publications, as well as delivering a good service. Events and other promotional work have the potential to enable Building Control to work on more profitable and interesting schemes, however this requires regular planned activities. It is noted that BCS do not undertake any events simply because they do not have the resources to do so, this should be considered a missed opportunity. It is assumed the new Business and Marketing Manager will be able to support such activities in the future.

It is surprising to note that BCS have not submitted an entry into the LABC Regional Awards since before 2018 however there have been four client entries (self-nominations that BCS would have endorsed), this underlines the importance some place on the awards and the recognition they can provide.

The LABC Awards represent a significant opportunity to recognise the excellent work being undertaken within the borough and district and making nominations and recognising the work done by regular customers. Many building control services run their own local awards which filter in to the nominations made at regional level, this is considered a great way to maintain and develop working relationships with local builders and agents.

The Building Control service is considered reasonably resourced in terms of staffing levels at present (both technical and support staff), although work pressure is no doubt being felt because of the vacancies on the establishment, something which is only exacerbated during times of annual leave and sickness. Work volumes (building regulation applications) have declined over the past three years by around 15%, it is therefore extremely important that BCS make every effort to maintain the existing customer-base which, while reasonably good at present, could be impacted if the area is further targeted by private sector providers.

LABC provides a service to members enabling local authority teams to create a 'universe' of existing, 'lost' and potential service users. LABC uses its third-party data agency working under a GDPR compliant arrangement backed by confidentiality and data security contracts and processes.

Members provide all their user data from the previous 24 months preferably including designers, architects, SME contractors, main contractors and developers including direct clients and property portfolio holders e.g., colleges, universities, schools, health and care, housing associations, etc.

LABC's team reformat and segment the data and this expanded and refreshed data can be used for: engagement, service planning, analysis of competency/staffing levels, options appraisals and transformation projects and revenue forecasting, etc.

### **Recommendations**

- 34. Exploration of the reasons some customers have experienced long delays, with a view to setting up suitable processes to improve the situation.**
- 35. The creation of an engagement plan (as part of a business plan) that will enable the Building Control service to maintain and develop professional relationships with new and existing customers.**
- 36. To encourage staff to support the LABC awards and perhaps consider running a local BCS awards event.**

## **I.3 Website assessment**

A full website assessment was carried out by LABC.

Overall, the website was found to be quite easy to navigate, Building Control is mentioned on the homepage and it easy to access other parts of the website.

Some of the positives included:

### **Positives**

- HTTPS is in place.
- Contact information present and easy to see.
- Map providing surveyor details is considered helpful.
- Resource library – keeping all downloadable items in one place.
- Forms are straightforward and clear.
- Link to Front Door.
- Building Control section links are working fine.

### **Some suggested changes and content:**

1. Header menu order change.
2. Search needs improvement. Doesn't give consistent results.
3. Padding on 'Testimonials', 'Working with our partners' and 'In this section' to be decreased. Holds too much space.
4. Consider adding breadcrumbs. There are currently none.

5. Copy explaining the difference between planning and building control. See LABC link suggestions point 2.
6. How to book a site inspection – the LABC app could be mentioned).
7. Consider side menu for content hierarchy.
8. No social media links on footer. Consider adding them.

## LABC link suggestions

- 1) The LABC App is available for builders and homeowners to book site inspections while out on site – Visit <https://labc.co.uk/homeowners/book-site-inspection> for details.
- 2) A link to a popular page on LABC about the difference between building control and planning. <https://www.labc.co.uk/homeowners/homeowners-guide-building-regulations/whats-difference-between-planning-permission-and-building-regulations>
- 3) Perhaps a mention of LABC's services, e.g. air pressure tests, acoustic services etc <https://www.labc.co.uk/professionals/labc-services>
- 4) A link to the Approved Documents pages on the LABC website which have additional guidance that will be useful to users as well as the Approved Documents themselves. Our link is: <https://labc.co.uk/professionals/building-regulations-guidance/approved-documents-and-technical-guidance-england>

Full details of the website assessment can be found in Appendix 2

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# J. Key Questions

## J.1 Is the BC Service compliant in terms of regulations, processes and standards?

BCS operate a Quality Management System, under BSI (certificate number FS 31971) across both partner authorities, a remote audit was conducted on the 16<sup>th</sup> June 2022 which concluded the requirements of ISO 9001:2015 had been met for the activities undertaken by the Building Control team within Place and Growth services.

A minor non-conformance was raised by BSI during the audit, relating to the internal audit process, this will be reviewed at the next scheduled audit.

It is understood plans were in place to undertake further work to enable the transfer to LABC's ISO Quality Management System, however works have been stalled until such times the future of the shared service has been determined. There is no requirement to effect this change, however it would make sense from a financial point of view (it's free to members) and from a network consistency point of view.

As part of this review, LABC undertook its own audit, against the LABC ISO 9001:2015, on the 13<sup>th</sup> October 2022. This reinforced the position stated by the BSI audit. No Non-conformances were raised and only four Opportunities for Improvement (OFI's) were highlighted (see K.1).

Financial management appears to generally be in accordance with The Building (Local Authority Charges) Regulation 2010 and current CIPFA Local Authority - Building Control Accounting Guidance (2010), however there appears to be an issue with the legal requirement for the local authority to publish financial statements. Having reviewed the outturn figures for BCS against the financial statement produced by Wokingham Borough Council, it appears the statement only includes details for the Wokingham element of the shared service and does not include the costs and income derived from West Berkshire. A review of the West Berkshire financial statements shows the building control account not featured at all.

It should be noted that there will be radical changes to the regulatory system, including registration, competency levels, work allocation and audit against new operational standard rules. As secondary legislation is issued, these changes will need to be embedded into new processes and practices.

LABC's ISO and Quality Management System will alter and adapt to suit any requirements introduced by the Building Safety Regulator, no doubt the BSI Quality Management System will too.

## **J.2 Does the BC Service exercise their judgement correctly in respect of alternative routes to reaching compliance under the Building Regulations?**

BCS's Building Control team generally believe competition does not influence how they operate; however they are certainly aware of the competitive nature of private sector providers.

The team always strive to deliver a good service and do not demonstrate any tendency to compromise standards to win work.

Because of the functional nature of the regulations, it is common for Building Control surveyors to be asked to consider alternative ways of achieving compliance and during the 'secret shopper' exercise this was tested, and the response received was positive. It is assumed a similar level of response would have been received from the other surveyors within the team. One team member considered competition led them to 'think outside the box' in achieving compliance, this is a good approach, however a clear statement in terms of achieving compliance with the functional requirements should be made when deviations from traditional guidance occur.

A 'buddy' system has been implemented which enables experienced and less experienced staff to work together. It is understood the workload of the less experienced surveyors is checked by either the Team Manager, Principal or Senior Building Control surveyors. As far as site inspections are concerned, during periods of absence surveyors are likely to inspect works checked by others and this is considered to provide a reasonable level of oversight. However measures should be put in place to ensure adequate mentoring and oversight of the less experienced members of the team, bearing in mind surveyors will not be able to undertake 'restricted functions' or 'restricted activities' unless they are registered, as part of the new regime under the Building Safety Act 2022.

## **J.3 To what degree does operating within a competitive environment affect the service's approach?**

Competition has existed within Building Control since the mid 1980's: at present there are around 90 firms of Approved Inspectors operating across England and Wales exerting varying degrees of pressure on the Building Control market (note there is no competition within Scotland and Northern Ireland).

BCS currently receives around 56% of all work (by volume of applications) which is lower than the national average (67%) and similar to that of neighbouring authorities which, from the latest details available, stands at around 56%, this is likely to be largely down to the loss of experienced staff to local approved inspectors and the presence of national and regional approved inspector offices and headquarters adjacent the area BCS operates.



We know some customers want a service route which presents the 'path of least resistance', and some will look for the cheapest provider, others will base their decision on the relationships they have built up over time and the quality of service.

Building Control charges are reviewed on an annual basis, since 2020 the standard fee for a typical extension has risen from £787.00 to £830.00, an approximate increase of 5% and the service has also dealt with a consistent level of unauthorised works; therefore there is no indication that BCS have kept their charges unaltered, knowingly accepted non-compliant work or reduced service standards below the regulatory minimum to secure work.

# K. Summary

## K.1 Recommendations, opportunities for improvement, areas of risk and good practice.

### Recommendations

1. *Discussions to take place with Wokingham and West Berkshire to gain a better understanding of how a lack of physical presence impacts on the standing of the service and engagement with other council services.*
2. *Discussions to take place with Wokingham and West Berkshire to determine how best to 'frame' the partnership as a public service.*
3. *Briefings undertaken, to raise the awareness of the Building Control service to members, staff, and management.*
4. *Building Control Board meetings and management briefings be reinstated as a matter of urgency, to rebuild relationships across the shared service.*
5. *Consideration be given to identifying the best and most appropriate ways to facilitate better working relationships between BCS, the planning teams at Wokingham and West Berkshire and other relevant council sections. This may include a structured approach to ensure Building Control is actively involved in all relevant pre-application meetings.*
6. *Discussions be held by senior management and elected members with responsibility for building control across both authority's about using BCS for all in-house and council funded schemes.*
7. *The Risk Register should be reviewed, updated as necessary and appropriate preventative measures actioned.*
8. *The Service Manager should review the effectiveness of the 'buddy system' with staff.*
9. *Regular 'whole team' meetings should be arranged to improve team working and to discuss and resolve any emerging operational issues.*
10. *A small task group comprising technical support and surveying staff be formed to review how work balance and process could be improved.*
11. *That a resolution be reached on the future of the partnership through a long-term agreement which includes a commitment to its future success.*

- 12. To put in place a plan to facilitate the registration of all building control staff, to ensure BCS can continue to fulfil its statutory functions, on behalf of Wokingham and West Berkshire councils, following the introduction of building control profession register.*
- 13. Once the new structure is in place, the Service Manager establishes a new regime for engaging with staff to ensure more effective working relations.*
- 14. The Service Manager should arrange for training, mentoring and support to be discussed with the whole team and take appropriate action to address any concerns raised.*
- 15. Whole team training be combined with team meetings.*
- 16. Consideration be given to ways of improving communication, including the potential for regular face-to-face team meetings (see also recommendation 12).*
- 17. Management actively engages with the Building Control team, creating a representative task group, to explore the factors affecting morale and works to resolve any issues raised.*
- 18. A review of the BCS dangerous structures service provision be undertaken and presented to Wokingham and West Berkshire councils to determine if it satisfies their statutory duties and corporate objectives.*
- 19. A review and refresh of the existing partner client list be undertaken, and consideration be given to explore ways to increase the number of active partner clients.*
- 20. To develop ways to gather feedback from clients who choose to use Approved Inspectors, to help determine any service improvements/changes required to secure future work.*
- 21. That all local authorities within the shared service look to procure BCS for any in-house projects.*
- 22. The Service Manager and Business Finance Partner work collaboratively to ensure accurate budget setting and re-charges apportionment.*
- 23. Clarification be sought on the most appropriate method of publishing BCS's financial statement by Wokingham and West Berkshire councils.*
- 24. All internal recharges to be reviewed to ensure BCS is only paying for services it receives.*
- 25. Consider a 'what if' plan should the reserve be exhausted.*
- 26. The work being currently undertaken by the WBC IT team continues to ensure the perceived lack of responsiveness to calls and emails is resolved.*
- 27. That work continues to facilitate on-line submissions and payment through the Tascomi online portal.*

28. *Exploration of how better use can be made of IT and social media for staff engagement.*
29. *Review of the automated messaging received by clients requesting inspections, to reduce the potential for abortive visits.*
30. *Regular meetings with surveying and technical support staff be arranged to improve working relationships and enhance operational efficiency.*
31. *Complaints procedures to be included on the BCS website.*
32. *To consider the use of social media platforms to promote and raise the profile of the building control services for Wokingham and West Berkshire.*
33. *To explore the use of the LABC Inspection App – to enable another communication channel for builders' and improve service delivery.*
34. *Exploration of the reasons some customers have experienced long delays, with a view to setting up suitable processes to improve the situation.*
35. *The creation of an engagement plan (as part of a business plan) that will enable the Building Control service to maintain and develop professional relationships with new and existing customers.*
36. *To encourage staff to support the LABC awards and perhaps consider running a local BCS awards event.*

### **Opportunities for Improvement**

- OFI 1.** *Review potential during validation process to record and/or address any potential 'Conflicts of Interest'.*
- OFI 2.** *Documenting plan check activity. It would be beneficial to establish a formal procedural method for recording the detail of plan assessments.*
- OFI 4.** *Counter Notice served on the Demolition Contractor and copies sent to statutory consultees and adjoining owners – as per BA 1984 Section 81 (5) and Section 81 (6).*

Note. OFI 3 was actioned and closed at the time of the audit

### **Risk Areas**

While there are a number of risk areas, relating to matters such as:

- Resourcing
- Financial management
- Readyng the service for the new building control regime

It is considered that the Service Manager has a 'good handle' on things and simply requires the support of senior management and those on the shared service board to effect the necessary changes to secure the future success of the service.

### **Good Practice**

**GP 1** - *Excellent access to the full range of performance data.*

**GP2** - *Comprehensive training plans*

Overall BCS operates effectively, this is testament to the dedication of all staff.

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# L. Closing Remarks

BCS is generally delivering a good service to the residents and businesses across Wokingham and West Berkshire, however improvements could be made, which are included within the report and summarised in Section K.

The Service Manager is acutely aware that current staffing levels and recruitment issues means the team are under pressure (particularly during periods of sickness and annual leave), despite this they are performing extremely well compared to many local authority building control services, this is a credit to the whole team. He appreciates the training and development being undertaken by members of the team only exacerbates the situation, however he realises the importance of supporting training and development and is proactive in reviewing the staffing structure, to reflect changing needs and to improve the day-to-day operation of the service.

The Building Control team will be losing an experienced member of staff shortly, this will further impact on the pressures felt by the team, the Service Manager has plans in place which he intends to implement in the new year.

Resourcing within the technical support team is considered reasonable and they appear to be managing their workloads effectively.

The impending introduction of the Building Safety Act will lead to significant changes for the building control profession. Local authorities need to ready themselves for the new regime which will require the following:

- All surveyors will have to be registered to practice, which will include validation of their competency on a regular basis.
- All local authorities will be required to operate under newly defined operational standards.
- All local authorities will be required to report on a range of key performance indicators (KPI's), which seek to verify the efficient and effective delivery of the service for its intended purpose.

The Building Safety Regulator will be responsible for the oversight of both public and private sector building control and will be provided with powers to intervene where it is considered a building control body (whether public or private) is not performing at an appropriate level.

BCS operate under an ISO Quality Management System (QMS), and it is clear from the BSI and LABC audits that processes and practices are very effective, although as is always the case there is room for improvement. LABC would encourage BCS to join the LABC ISO and QMS which will align itself to the operational standards and KPI's mentioned above, as these are introduced and developed.

Covid and the resulting move towards home working has meant the whole team has to adapt and while there are no significant problems, all team members seem to be coping relatively well, there does appear to be some tension across the surveying and technical support teams, and it is felt more could be done to improve communication.

Communication was mentioned a few times during stakeholder interviews, and this is likely to be a contributory factor to evidence of low morale and staff feeling under-valued corporately.

The strategic importance of building control across Wokingham and West Berkshire, in terms of public and consumer protection should not be overlooked, indeed the Public Protection Manager at West Berkshire feels this should be an area of specific focus and would like to see a greater emphasis placed on this by BCS, this is something that needs to be explored.

It is critical for the success of BCS that a decision be made on the long-term commitment of both authority's, since this would potentially help improve recruitment, retention and market share and just as importantly staff morale.

It is suggested the Service Manager reviews the range of recommendations and issues highlighted in Section K of this report, which are aimed at improving the building control service.

LABC would like to thank all those who contributed to the stakeholder interviews and in particular the Service Manager for his support in providing all the necessary information to complete the review of BCS.

LABC hopes you find this review useful and will be ready and willing to help and support BCS wherever possible.

# Appendix 1 – Process and Controls Audit

## Internal Audit for Building Control Function

QMS Process Management Audit	
<b>Local Authority OR Building Control Trading Name</b>	BC Solutions
<b>Date of Audit</b>	13/10/22
<b>Auditor Name &amp; Job Title</b>	Sara Hiscox - Building Control Team Manager
<b>Auditor Name &amp; Job Title</b>	
<b>Auditor Name &amp; Job Title</b>	

### 1. Role of Internal Audit

The LABC QMS internal audit is planned and conducted to evaluate Building Control functions conformity to the international standards ISO 9001:2015 and the LABC Quality Management System (QMS) demonstrating effective risk management, control and governance processes.

The role of the internal audit can be defined as an independent, objective activity intended to add value and improve Building Control operations to provide a useful backdrop for the setting and achieving of objectives by bringing a systematic, disciplined approach.

Building Control Management Teams are responsible for establishing and maintaining appropriate risk management processes and control systems. The internal audit plays a vital role in advising the Management Team about the suitability and effectiveness of current arrangements.

The Management Team's response to internal audit activity should lead to the strengthening of process controls and, therefore, contribute to the establishment and achievement of objectives.

### 2. Definition of Internal Auditing

An audit is an evidence gathering process. Audit evidence is used to evaluate how well specific criteria are being met. Audits must be objective, impartial, and independent, and the audit process must be both systematic and documented.

Internal or first party audits are used to confirm or improve the effectiveness of management systems. They're also used to establish level of conformity with an ISO standard.



### 3. Scope of Audit

The scope of an audit is a statement that specifies the focus, extent and boundary of a particular audit. The scope can be specified by defining the physical location of the audit, the organisational units that will be examined, the processes and activities that will be included, and the time that will be covered.

The scope of this internal audit is all Building Control functions that are covered by LABC QMS processes and the requirements of ISO 9001:2015.

#### Scope Wording

The provision of public sector building control and public protection services.

Processes included:

- Building Notice Application
- Full Plans
- Regularisation
- Initial Notice
- Reversion
- Site Inspection
- Enforcement
- Dangerous Structures
- Demolition Notice
- Document Management
- Customer Complaints and feedback
- Audit

Aspects considered and audited across all functions include:

- Information security and data controls
- Record control
- Process controls and interaction of processes
- Risk management
- Training and development
- Resource management
- Management commitment

### 4. Audit Criteria

#### The LABC QMS

Building Control Teams' adoption of the LABC QMS to achieve UKAS Accredited Certification under the scheme. The QMS comprises of a number of interlinking parts, all focused on demonstrating competency, consistency and quality of public service building control.

**BC Solutions have a Quality Management System (ISO 9001) which is externally audited and certified (UKAS Accredited) by BSI. The QMS is well embedded within all activities and processes. Recertification completed on 15 Feb 2022 demonstrating that the QMS continues to be well managed and maintained.**

## Wokingham Borough Council-Building Control Solutions

<b>Certificate number</b>		<b>FS 31971</b>	
<b>Scope</b>		<b>The activities undertaken by the Building Control team within place and growth services.</b>	
<b>Original registration date</b>	<b>Effective date</b>	<b>Last revision date</b>	<b>Expiry date</b>
<b>19/7/1995</b>	<b>15/2/2022</b>	<b>29/6/22</b>	<b>14/2/2025</b>

Using regular team meetings, briefing, training sessions and email, the Building Control Management Teams ensure that all members of the team and others within its control are aware of:

- The quality policy
- Relevant quality objectives
- Their contribution to the effectiveness of the Quality Management System, including the benefits of improved performance
- The implications of not conforming with the Quality Management System requirements

### 5. Raising Non-Conformance (NCR) or Opportunity for Improvement

Opportunities for improvement (OFI) represent wide range of findings. You may identify gaps or process control weakness or minor issues, such as an uncaptured record that could amount to a non-conformance if not addressed. Each OFI should be considered for potential improvement and to further investigate any system weaknesses for possible inclusion in the corrective action process. When a process is not entirely followed as per the LABC QMS or as to the standards (ISO 9001) requirements.

Other OFI's are observations that cannot be directly recorded as an NCR against the LABC QMS or the International Standard. This observation cannot be directly referenced to the non-conformance of a requirement; however, these should be treated as non-conformances for they might amount to non-conformances if not treated accordingly. OFI's generally address two types of incidents – Negative situations which are visible to the auditor, or activities observed by the auditor during an audit that could, if reported, enhance an operating efficiency. OFI's in some cases come from an auditor's experience. Each auditor brings a unique perspective on your internal processes

Non-Conformances are based on the objective evidence gathered during the audit, the absence of, or a significant failure to implement and/or maintain conformance to the requirements. A situation which would raise significant doubt as to our capability to achieve the stated policy and objectives of the QMS. Or any potential legal non-compliance is always to be recorded as an NCR.

## **Training and Competency**

The Detailed Competency Matrix identifies surveyor competencies against type(s) of work. The Management Team should continually use this matrix to ensure that the team has the correct knowledge and competency for their work profile.

The Building Control Management Team must ensure that resources are appropriate for the level of work and service provision required; for example, ensuring the appropriate number of people, their appropriate competency and continued development relative to the work profile for their authority and work.

Should applications be deposited for work outside the team's resources, knowledge or competency, the Management Team should identify this and bring in resources, knowledge, updates and experience from another source such as the LABC network.

Such competency may be based on education, experience, training and skills.

The Detailed Competency Matrix is used to assess the capability of individual personnel to perform specific work tasks and the appropriate level of responsibility.

On an on-going basis, the Building Control Management Team is aware of, and will react to, the training requirements of all personnel whose work has a direct or indirect effect on any aspect of quality and service delivery.

Where it is found to be necessary, the Management Team will take action to acquire the necessary competence through training or will provide the mentoring or the reassignment of staff.

All staff training must go through a process of evaluation which must be recorded as evidence of competence.

All new members of staff should receive appropriate induction training during their probationary period. This includes an introduction to the LABC Quality Policy and their individual role in the operation of the Quality Management System.

Staff training and competence is assessed by considering everyone's education, skills and experience.

Requirements for further training are identified as part of day-to-day management, staff appraisals and as part of the Management Review process.

Staff appraisals are undertaken by management, in line with the Council performance and appraisal systems, to identify the performance of staff, training needs and to encourage continuous development. It is used as an opportunity for staff to identify their own strengths and weaknesses. Continuous professional development schemes are initiated where appropriate and special skills are centrally listed to assist deployment to tasks; providing staff with sufficient training and professional guidance to execute their duties satisfactorily.

<b>Training and Competency</b>		
<b>Recruitment</b>	<b>Current Practice</b>	<b>Improvement</b>
How do you ensure that an individual recruited is suitable for the role?	<p><b>Role is defined and determines the responsibilities, what qualifications and experience from a candidate, list qualifications and skills</b></p> <p><b>Process includes</b>  <b>Qualification – Training spreadsheet</b>  <b>Face to face interview (by panel)</b>  <b>implementing a point system based on the Person specification.</b>  <b>Plan check test / knowledge test.</b>  <b>Application for Principal Surveyor role will also carry out a presentation.</b></p>	
How are individual roles and responsibilities established and defined?	<p><b>All job specifications include roles and responsibilities.</b>  <b>Individuals undergo Skills analysis at least annually.</b></p>	
What is included in the induction process for new members of staff? Is there a training plan in place?	<p><b>Any relevant and required training is identified and provided.</b>  <b>New employees and trainees are buddied for training purpose.</b>  <b>Trainees are always supervised with senior sign off for decisions.</b></p>	
<b>Training and Competence</b>	<b>Current Practice</b>	<b>Improvement</b>
Based on the results of the competency assessment (utilising the 'LABC Competency Matrix'), what Learning & Development strategy has been put in place?	<p><b>Skills and knowledge assessment form using traffic light system (Apprenticeship hub doc.)</b>  <b>Skills review includes- OHS, Building Regulations, sustainability, enforcement diplomacy</b></p> <p><b>Skills and knowledge are divided into commercial and domestic.</b></p>	
How is training, specifically for 'skills transfer' activities (e.g., shadowing, peer review), recorded?	<p><b>Via skills review</b></p>	

<p>How has Succession Planning been addressed? Does it provide a plan for developing skills and knowledge of existing team?</p>	<p><b>Any training identified as required by senior team members is cascaded to wider team to ensure knowledge and skills are shared across the whole team.</b></p> <p><b>Current trainees include 2 that are going through the BC surveying degree course, 1 trainee with construction background completing LABC level 5 course and another (more experienced) trainee currently shadowing.</b></p>	
<p>Do all personnel have access to the LABC VLE?</p>	<p><b>Yes – all have access and is regularly referred to.</b></p>	
<p>How do you retain appropriate documented information to evidence competence?</p>	<p><b>Various documentation reviewed during audit. Evidence includes current assessment of competence and desired level with plan to achieve.</b></p>	
<p>How do you determine and record competency deficiencies? Does each member of staff have a training plan for the current year?</p>	<p><b>Training plans in place and soundly adhered to</b></p>	

Building Regulation Procedures			
Validation and Plan Checking	Full Plans Application		
What was the project number or reference number?	Back-office System: TASCOMI Ref Number: 22/1810/DLCP		
Record Dates			
Application Received	23/06/22		
Payment Received	27/06/22		
Acknowledged	27/06/22		
Validated	27/06/22		
Plan check Target (10 days)	06/07/22 – KPI to Board.		
Plan check Statutory (5 Weeks)	27/07/22		
Extended time? Plan Check Statutory (8 Weeks)			
Plan check completed	26/07/22		
Validation Process Must include:	Activity	Included in process	Performed by (TSO, BCO)
	Application is entered into the BC computer system with unique reference number	✓	TSO
	All accompanying documents and generated correspondence are stored in the case file and appropriately referenced against the case number – (Hard copy or electronic)	✓	TSO
	Deposited fee is recorded and receipted.	✓	TSO
	Assess the application and determine the charge to be invoiced	✓	TSO
	Check that the deposited fees and documentation are correct	✓	TSO
	Application is plotted on GIS (or similar) System	✓ (UPRN)	TSO
	Acknowledgement letter is sent to the applicant / agent OR letter is sent to the applicant requesting additional information and / or payment	✓	TSO
	Determine if the application is affected by a sewer and consultation with water authority	✓	TSO-BN BCO-FP
	Does the validation process record &/or address any potential 'Conflicts of Interest'	✗	OFI1

<p>What was included in the Validation process?</p> <p>Record evidence on file or BC Computer system demonstrating conformance.</p>	<p><b>Application received via email or portal</b>  <b>Saved to folder in date order</b>  <b>Front sheet (validation proforma) is completed</b>  <b>Fee are checked against the description of works and any drawings</b>  <b>Standard fee schedule – checked against plan.</b>  <b>Application id then added to TASCMI and is either acknowledged or fee letter is issued (to applicant or agent).</b>  <b>Payments received are checked daily and application is validated (and acknowledged)</b>  <b>UPRN identified</b></p> <p><b>TSO will check sewer map for Building Notice and surveyor to check for Full Plans as part of the Plan check activity.</b></p> <p><b>Val = dates (valid date which generates plan target check date)</b>  <b>Acknowledgement includes guidance and inspection regime (generic)</b>  <b>Upload docs (internal Comms and file attachments).</b></p> <p><b>Allocated to surveyor by area – or specified plan checker.</b>  Front screen – fees screen  Commence sheet</p> <p>BCO is 1<sup>st</sup> point of contact for Inspection bookings</p>
<p>Were all necessary consultations carried out at the appropriate times and is there evidence of any feedback being communicated to the client?</p>	<p><b>Use of external registered Structural Engineer</b></p> <p><b>Approval received</b></p>
<p>What criteria was used to allocate a case officer?</p> <p>Was a review of competency and resource availability undertaken before the project was allocated to the surveyor?</p>	<p><b>Dedicated plan checker</b>  <b>Partner of trainee and experienced BCO by area</b>  <b>5 areas – 2 people each</b>  <b>(Senior and junior)</b>  <b>Comm to trainee with sign off Principal.</b>  <b>Workload is also considered.</b>  <b>Good use of buddy system (Good Practice)</b></p>
<p>Record competency level for plan checking</p>	<p><b>Agency (level 5)</b></p>
<p>Was a plan check carried out and communicated to the client? Was this to a good standard? What evidence of plan check is available on file? Pro-forma or any supporting documentation?</p> <p><b>NOTE</b></p> <p>Full Approval of plans without documentation should be recorded as a non-conformance</p>	<p><b>Good evidence of plan checks in form of conditional approval.</b></p> <p><b>OF12 – It would be beneficial to consider how plan check activity and areas considered by Plan Checker can be better evidenced</b></p>

How was the inspection plan determined? How was this communicated to the client?	<b>Generic inspection is issued with acknowledgement – applicant to contact prior to each stage. Further arrangements are agreed on site – following commencement and subsequent visits.</b>
Where contraventions were identified, were these adequately communicated and followed up on? Were there any plan amendments made as a result of the Plan Check process?	<b>Numerous conditions were identified as a result of plan checking and were communicated in clear concise language within the ‘Condition Approval Notice’</b>
Full or Conditional Approval?	<b>Conditional</b>
<b>Site Inspections (Can be continuation of Validation and Plans Assessment Audit)</b>	
<b>Record dates</b>	
Notification of Commencement	<b>28/6/22</b>
Number of Inspections (Total)	<b>3</b>
Date of Completion Inspection	<b>24/08/22</b>
Did completed site inspections match service plan / inspection framework established at Plan Check?  If no, how was this communicated to the client (owner / person carrying out the work)?  Was this monitored and reviewed against delivery?	<b>3 inspections completed which is appropriate for the type of work (loft conversion) and for fee charged.</b>
Were Conditions (if any) considered / referenced during inspections?	<b>All conditions cleared with evidence on site. Discharge &amp;/or clearing of conditions is included within the completion check list (Good Practice)</b>
Were any interventions identified and recorded in inspection notes?	<b>Yes – specifically relating to fire safety</b>
Are site inspection notes appropriately detailed?  <b>NOTE: Inspection Notes are the output of the Inspection Process, as such they should provide a record of what the inspection included and the outcome.</b>	<b>Good use of notes – all salient information included in all records (incl. interventions)</b>
Are inspection records suitable to be provided to the owner of the building if requested?	<b>yes</b>
Are any relevant Certificates (e.g., Electrical) on file &/or referenced (as seen) in Inspection Notes?	<b>Gas and electric certificated and held on file</b>



Were any issues that reached stage 2 enforcement notified to the owner and / or person carrying t the work? <i>(If yes, see Enforcement Audit Template)</i>	N/A
<b>Completion Certificates (Can be a continuation of above)</b>	
Were any Conditions of Approval discharged (if appropriate)?	<b>All conditions discharged Completes file with completion check list – 5-day target TSO team receive checklist and file before sending completion certificate (Good Practice)</b>
Has a completion certificate been issued?	Yes
Is the file complete? <i>(If continued from above, review Plan Check and Inspection audit)</i>	<b>Well managed file.</b>

<b>Document and Record Control</b>	
<b>Control of internal template documents used by Building Control at any point in the above Process (e.g., Proformas, Approval Notices, Completion Certificates)</b>	
Describe method of control	
<b>All controllable documents and identified and recorded. Current Templates are available to users via TASCAMI system.</b>	
Are Controlled Documents defined? (Do we know what they are / where they are stored?)	
<b>Defined by naming conventions and are easily identifiable by users.</b>	
Are Controlled Documents version controlled? (Do we know what the current version is / what happens to outdated versions?)	
<b>Previous templates are archived and only current available to user. Version is identifiable on template.</b>	
<b>Record control of live and completed files relating to specific applications, Dangerous Structures, Demolitions etc.</b>	
What is the method for storing and maintaining records?	
<b>Electronic filing system with records accessible via TASCAMI system.</b>	
Are files audited complete? Were required records easily identifiable, retrievable and legible?	
<b>Files are well managed and maintained</b>	

Dangerous Structures		
Number of reported Dangerous Structures in 12-month period.	Circa 80 YTD	
	Dangerous Structure 1	Dangerous Structure 2
What was the project number/ reference number?	1058/DST	2642/DST
From evidence in the file, was the appropriate action taken to <u>assess</u> the potential danger?	Phone call report of DS. Allocated to surveyor. Car impact structure single storey Surveyor attended onsite.	Phone call report of DS. Allocated to surveyor. Loose chimney – Surveyor attended onsite.
What was the result of the initial assessment? Are the surveyor's findings recorded?	Assessed as dangerous Telephone call to owner of the property.	BCO attended site to inspect and assess danger. Report includes photo evidence.
From evidence in the file, was the appropriate action taken to remove danger or inform owner / occupier of potential danger?	The site was fenced off from the public.  Lots of contemporaneous notes.	Recorded as not dangerous
Were efforts made to establish ownership before carrying out any works?	Surveyor established ownership whilst on site.	
Was the correct notice served in the appropriate manner? OR if appropriate, 'Defective Letter' sent to owner of the property.	Actions agreed with property owner.	N/A
Were case notes appropriately thorough?	Yes	Yes
Was further monitoring required? From evidence in the file, was the appropriate monitoring activity recorded?	Additional visits recorded (fencing erected)	None
Has the Dangerous Structure Report been closed?	No – OFI3	Closed
Were invoicing procedures followed?	N/A	N/A
Was a charge put on the property for any unpaid debt?	N/A	N/A

Demolitions	
	Demolition 1
What was the project number/ reference number?	<b>2904</b>
Was the Counter Notice served on the Demolition Contractor and copies sent to statutory consultees and adjoining owners?	<b>Counter Notice (Section 81) served to contractor only. Statutory undertakers are not issued copies (in line with current BCS procedure)- OFI4</b>
Were inspections made during and after Demolition Process and Inspection Notes recorded?	<b>Post demolition checks are performed by BCO (Good Practice)</b>
Were any issues reported to the Demolition Contractor / Owner, HSE or other statutory bodies as appropriate?	<b>None</b>

Initial Notices	
	Initial Notice 1
What has been included as part of the application process for Initial Notices? GIS Plotted?	<b>Initial Notices are recorded on TASCOMI (with UPRN). Ground for rejection and non-acceptance are known and understood by TSO's.</b>  <b>Checks on commencement only if practicable.</b>  <b>Where no grounds for rejection are identified IN's are accepted within 5-day period.</b>
Has work commenced?	
Have all grounds for rejection been checked as part of the acceptance process?	
Were plans accepted within the 5-day period?	
Were any grounds to reject identified?	

Management Responsibility		
	Observations	Compliance Accepted (Yes/No)
Is there an annual Management Review meeting?	<b>Yes – conducted under the requirements of ISO 9001:2015</b>	
Does this meeting cover the main QMS issues? <ul style="list-style-type: none"> <li>• Customer Focus</li> <li>• Quality Policy &amp; Objectives</li> <li>• Responsibility &amp; Authority</li> </ul>	<b>Follows ISO 9001:2015 conforming agenda including all QM inputs and QM outputs.</b>	

Do the Management Review meetings adequately show Management Commitment	Yes	
Has the Management Team: <ul style="list-style-type: none"> <li>• Reviewed internal audits</li> <li>• Reviewed non-conformances</li> <li>• Reviewed changes in practice, process &amp; procedures</li> </ul>	<p><b>Internal audits conducted on a 2-year rolling programme. Divided into processes e.g., Examination of Plans, Site inspection, Dangerous Structures, Competence.</b></p> <p><b>Also, employ the use of Corrective monitoring spreadsheet to track improvements, trends analysis.</b></p>	

<b>Customer Complaints</b>		
	Observations	Compliance Accepted (Yes/No)
Is there a documented process for dealing with complaints?	<p><b>Customer Charter inviting Customers air complaints directly.</b></p> <p><i>If you are not satisfied</i></p> <ul style="list-style-type: none"> <li>• <i>We will tell you exactly how to complain.</i></li> <li>• <i>We will deal with the problem fairly and openly.</i></li> <li>• <i>We will give you a written reply.</i></li> </ul> <p>Formal complaints procedure is in place with lots of online information.</p> <p>Complaints are recorded in the Log register</p>	
How many complaints have been received in the past 12 months?	2	
Is there a pattern to the complaints? If so, please provide examples.	Non identified – reviewed as part of annual MR	
Are there any complaints outstanding and, if so, are these being addressed?	No	
What feedback mechanisms are in place to avoid a repetition of the issue?	Corrective monitoring spreadsheet	

## 6. Audit Conclusion

Record of Opportunities for Improvement (OFI)				
	OFI identified	Details of improvement	Target date	Date closed
OFI 1	Review potential during validation process to record &/or address any potential 'Conflicts of Interest'			
OFI 2	Documenting plan check activity.  It would be beneficial to establish a formal procedural method for recording the detail of plan assessments.			
OFI 3	Dangerous Structure Report are not always closed once established as safe.	All BCO's have since been notified (by email) to review all open DS reports and to close any that <u>do not</u> require further monitoring &/or invoice.	Actioned prior to audit	Closed
OFI 4	Counter Notice served on the Demolition Contractor and copies sent to statutory consultees and adjoining owners – as per BA 1984 Section 81 (5) and Section 81 (6).			

Record of Non-Conformance Reports (NCR)					
	Reason for raising an NCR	Investigation or evaluation results	Corrective or preventative action	Target date	Date closed
NCR 1					
NCR 2					
NCR 3					
NCR 4					
NCR 5					

# Appendix 2 – BC Solutions - Website Review

## General impression – home page

<https://www.bcsolutions.org.uk/>

Building control is mentioned on the homepage and therefore quite easy to access from there.

Overall, the homepage looks good with easy access to other parts of the website.

Header menu items can be changed. Suggestion would be to change the placing of the 'Contact BCS' tab to show last.

## Positives

- HTTPS is in place.
- Contact information present and easy to see.
- Resource library – keeping all downloadable in one place.
- Font sizes and colours are good.
- Variety of information.
- It is responsive for all sizes of screen and mobile friendly.
- Download links for different types of applications are working.
- Forms are straightforward and clear.
- Link to Front Door.  
Building Control section links are working fine.

## Suggested changes and content:

9. Header menu order change.
10. Search needs improvement. Doesn't give consistent results.
11. Padding on 'Testimonials', 'Working with our partners' and 'In this section' to be decreased. Holds too much space.
12. There are double spacings within content. No consistencies with spacings.
13. Consider adding breadcrumbs. There are currently none.
14. CTA could be added for 'Apply for building regulations approval' on related pages.
15. URLs to include keywords.
16. Copy explaining the difference between planning and building control. See LABC link suggestions point 2.
17. How to book a site inspection. (You could mention the LABC app).
18. News & Events page could have filters.
19. Consider side menu for content hierarchy.
20. No social media links on footer. Consider adding them.

## LABC link suggestions

- 5) The LABC App is available for builders and homeowners to book site inspections while out on site – Visit <https://labc.co.uk/homeowners/book-site-inspection> for details.
- 6) A link to a popular page on LABC about the difference between building control and planning. <https://www.labc.co.uk/homeowners/homeowners-guide-building-regulations/whats-difference-between-planning-permission-and-building-regulations>
- 7) Perhaps a mention of LABC's services, e.g. air pressure tests, acoustic services etc <https://www.labc.co.uk/professionals/labc-services>
- 8) A link to the Approved Documents pages on the LABC website which have additional guidance that will be useful to users as well as the Approved Documents themselves. Our link is: <https://labc.co.uk/professionals/building-regulations-guidance/approved-documents-and-technical-guidance-england>

## Summary

Overall, there is good and easy to follow information regarding building control on the website but could be more user-friendly. There are some suggested improvements that would elevate the look and feel of the website.

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# Appendix 3 – ‘Secret Shopper’ Exercises

## Secret shopper #1 – request for fee quote

Notes from call

Called at 15.47 16/9/22 using the number from the website 03007900580. The call was answered by a recorded message asking me to hold – I only waited 23 seconds before the call was answered by a member of the technical support team.

I explained that I was replacing all the windows and doors on my property at 30 Rectory Road, Wokingham. I said we were thinking about using an installer who wanted to use building control and I needed a fee quote.

The member of technical support stated that the fee would be £206 including VAT. She offered to email me a form. She explained that 3 days after submitting the form I would be asked for payment via a link and that once paid I could book inspections through the website. She said I would receive a certificate once the work was all completed and inspected.

She again offered to email a form, but I said I wasn't sure if we'd be using that installer and might be using a Competent Person.

I then asked if I could speak to a surveyor as I had a technical query about trickle vents. After checking the location she said she would put me through to the relevant surveyor.

The member of technical support was extremely prompt, helpful, professional, and informative. She explained the process and even looked up the postcode for me to make sure I was put through to the right surveyors.



## Secret shopper #2 – technical query

I went through to a friendly answerphone message from the surveyor asking me to leave a message. I did so at 15.53 on 16/9/22

The surveyor called back at 11.21 on Tuesday 20<sup>th</sup> (after the bank holiday) and left a message

I called him back at 13.35 and he answered immediately giving his name.

The questions and responses are outlined below.

### 1.1 Do I need Building Regulations approval for replacing all my windows and external doors?

#### Expected response

Replacement windows and doors are frequently installed by a person who is a member of a suitable 'Competent Person Scheme' as detailed in [Schedule 3 of the Building Regulations 2010](#), such as FENSA. In this instance, the installer self-certifies that the works comply with the Building Regulations and notifies your Local Authority Building Control Department that the works have been undertaken. It is important that the installer provides you with a 'Building Regulation Compliance Certificate' upon completion for your records.

However, if you're employing someone who isn't registered on a suitable 'Competent Person Scheme', you'll need to make a Building Regulations application before commencing works.

#### Actual response

**Yes, for both windows and doors. Any new exterior window needs to comply. If you went ahead without the certification or getting it signed off, it would delay the sale if you tried to sell in the future. You can use a FENSA registered installer or make an application to us.**

### 1.1. My current rear door is fully glazed. For privacy purposes I would like to change it to a solid door. Am I allowed to do this under Building Regulations?

#### Expected response

Yes, and if the amount of glazing is less than 50% of the new door and frame, this particular door would not require a Building Regulations application to be deposited as detailed in [paragraph 1\(h\), Schedule 4 of the Building Regulations 2010](#).

#### Actual response

Yes, you are allowed, and you'd still need to make a building regs application for this door. I clarified this twice emphasising an unglazed door.

## 1.2. My current windows do not have trickle vents. Would the replacement windows be OK without trickle vents too?

### Expected response

Replacing the windows is likely to increase the airtightness of the dwelling. If ventilation is not provided via a mechanical ventilation with heat recovery system, then increasing the airtightness of the building may reduce beneficial ventilation in the building. In these circumstances, it is necessary to ensure that the ventilation provision in the dwelling is no worse than it was before the work was carried out.

This may be demonstrated in a number of ways as detailed in [paragraph 3.15 of Approved Document F \(2021 edition\)](#). However, the easiest way to comply may be to ensure trickle vents are provided in the replacement windows equivalent to the following:

- Habitable rooms – minimum 8000mm<sup>2</sup> equivalent area.
- Kitchen – minimum 8000mm<sup>2</sup> equivalent area.
- Bathroom (with or without a toilet) – minimum 4000mm<sup>2</sup> equivalent area.

### Actual response

No, you'll need trickle vents now, the regulations changed on the 15<sup>th</sup> of June.

Ask your supplier if they are fitting the right sized trickle vents.

You can Google Approved Document and trickle vents to check the sizes

## 1.3. What U-values must the replacement windows and external doors achieve?

### Expected response

Windows and doors need to achieve a U-value of 1.4 W/(m<sup>2</sup>K) or better, as per [Table 4.2 of Approved Document L Volume 1 \(2021 edition\)](#).

### Actual response

U-values are basically thermal calculations for how to keep heat in (I liked this!). They should meet 1.4

**1.4. My property currently has timber windows and doors. I would prefer the replacement windows and doors to also be timber to maintain a similar appearance. Are there any relaxations for the thermal performance of replacement timber windows and doors in the Building Regulations?**

#### **Expected response**

For timber windows, a maximum U-value of 1.6 W/(m<sup>2</sup>K) is permissible until 14 June 2023 as detailed in [Table 4.2 of Approved Document L Volume 1 \(2021 edition\)](#).

For timber doors, a maximum U-value of 1.8 W/(m<sup>2</sup>K) is permissible until 14 June 2023 as detailed in [Table 4.2 of Approved Document L Volume 1 \(2021 edition\)](#).

From 15 June 2023 the full standard of 1.4 W/(m<sup>2</sup>K) applies.

#### **Actual response**

**You can use timber, but they would have to meet the new thermal requirements.**

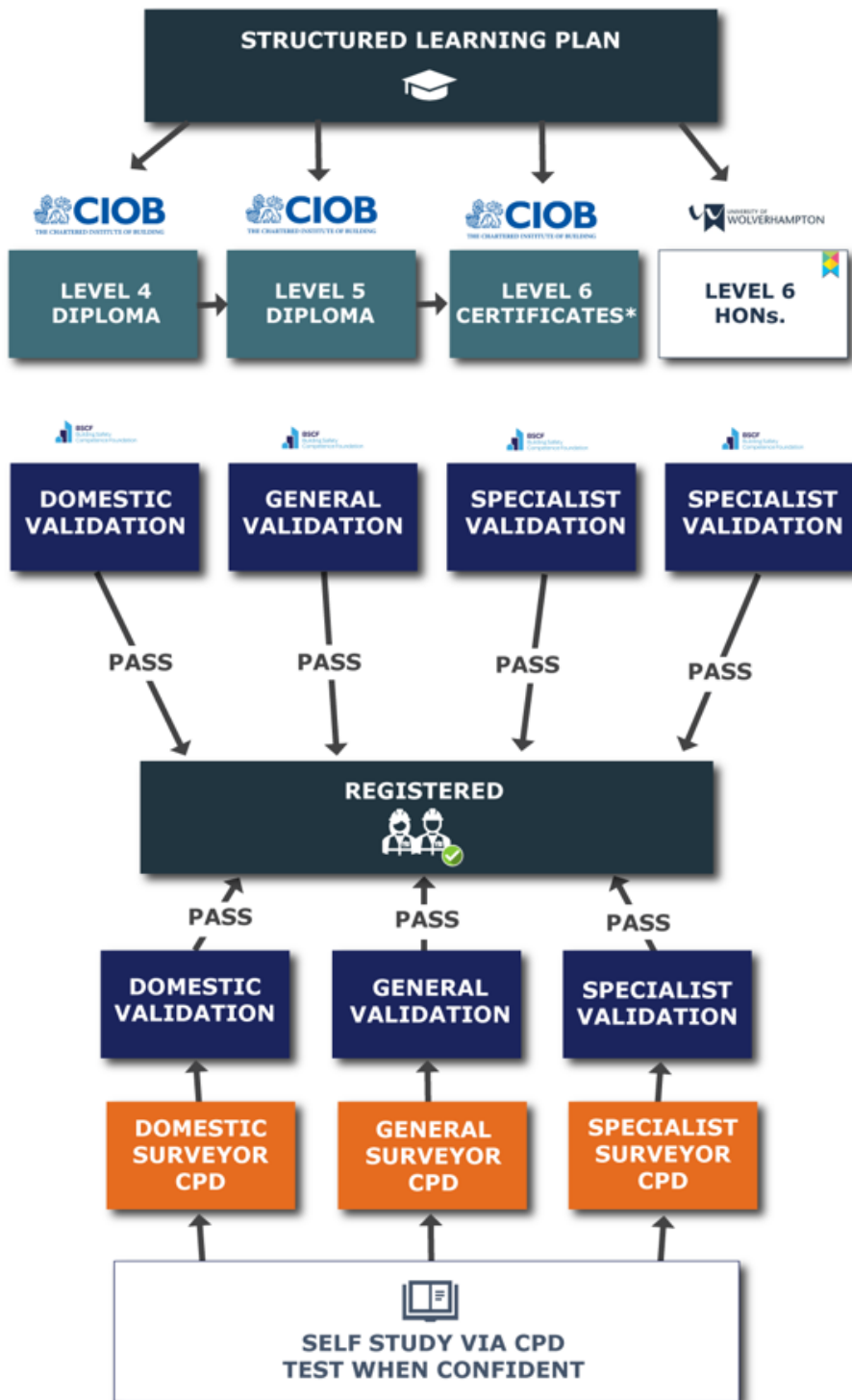
**Once you've made your application, you can send us the specification and we'll check it.**

The surveyor was friendly, professional, and polite. He answered all my questions and gave extra information that I hadn't asked for.

The explanation from the surveyor was not terribly technical or in-depth, this is similar to other mystery shopper exercises undertaken.

Based on this call and my previous call to technical support, as a homeowner, I would definitely want to use BC Solutions for my project.

# Appendix 4 – LABC Qualifications/Validations



\*Fire Safety in Complex Buildings, Managing Legislative Compliance, SASG and other Public Events and Management of Public Service Building Control.

Consultative Peer Review: BC Solutions - Building Control Service

# Appendix 5 – Presentation slides

**LABC**  
**Peer Review**



Presented by Richard Scott  
LABC – Head of Member Support








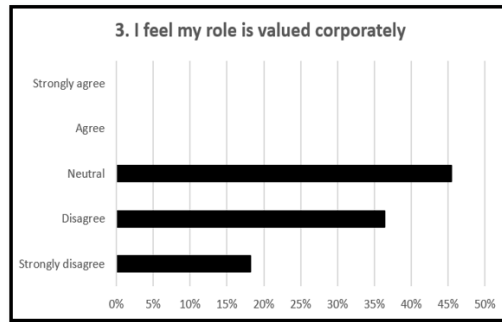



## Methodology...

 Preliminaries	 Review	 Report
Information gathering <b>Confidential staff survey</b> <b>Secret shopper</b>	<b>Context</b> Stakeholder interviews <b>Audit</b> <b>What's happening in practice?</b>	Independent and critical review <b>Key questions</b> <b>Recommendations</b>

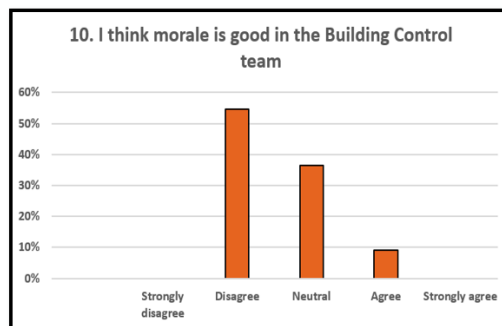


## Confidential staff survey – do staff feel valued?



4

## Confidential staff survey – team morale



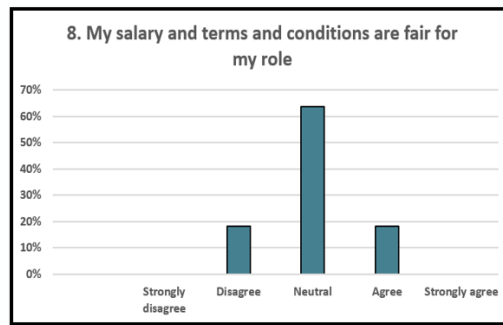
5

## Confidential staff survey – team performance



6

## Confidential staff survey – team performance



7

## Open ended questions

Weaknesses	Strengths
Resourcing levels	Team work by surveyors
Communication within the team	United management team
Recruitment	Management
Team work	Team members – who go above and beyond
How communication occurs	
Resilience – due to resourcing	
Recruitment	



8

## Secret shopper

### Snapshot surveys – check on:

- Telephony system
- Initial response
- Core knowledge
- Flexibility of approach
- Customer service



9

# Review



## BCS in context



West Berkshire Borough Council

Wokingham District Council

Every authority is different



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## Building Control in context

**Best Thing**

- Feeling valued
- Job autonomy
- Level of support
- Work/life balance
- Management

**Biggest Challenges**

- Lack of resources
- Training/development
- Volume of work
- Staff retention
- Cost of living

87%



White

58%



15-25 Years+  
Length of Service

81%



Male

64%



Aged 45+

Extract from LGA Survey



12



## Building Control in context

### Employee Contribution

- 1) I feel secure in my job
- 2) Overall, I am satisfied with what my employer provides for me and what I am expected to provide in return
- 3) There is a 'no blame' culture - mistakes are talked about freely so we can learn from them
- 4) My employer invests in building my capabilities through learning and development
- 5) My employer values my accomplishments at work

### Desire To Stay

- 1) I would recommend my employer to a friend
- 2) Overall, I am satisfied with what my employer provides for me and what I am expected to provide in return
- 3) My employer provides me with good prospects for career progression
- 4) My employer demonstrates a genuine concern for my wellbeing
- 5) I feel secure in my job

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## Building Safety Regulator

- The BSR, headed up by the Chief Inspector of Buildings, is the new building control authority for all in-scope buildings
- The BSR will oversee the safety and standard of ALL buildings
- The BSR will oversee the registration of the building control profession – key dates Oct' 23 and Apr' 24
- All which will have significant implications for local authorities
- It will also have significant implications for individuals too

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## What's happening in practice

- Staff are struggling to cope with the workload, partly down to the training many are undertaking to support their future registration/validation
- The team is becoming frustrated and tensions exist
- Communication appears to be an issue
- The Service Manager is steering the 'ship' through very turbulent waters

15



# Audit against the LABC ISO



Quality Management System – ISO 9001:2015



16

## Performance

### Income per surveyor

Maximum	Average	Minimum
£153,449	£80,385	£48,505

### Ratio – tech support per surveyor

Maximum	Average	Minimum
1 : 1.16	1 : 3.2	1 : 7

↑  
1 : 2.5

### Applications per surveyor

Maximum	Average	Minimum
211	162	80

Applications registered with 3 days of receipt **99%**

### Inspections per surveyor

Maximum	Average	Minimum
6.5	4.65	2.9

Completion certificates issued within five days of satisfactory inspection **98%**

↑  
4.5



17

## Key question

Is the BC Service compliant in terms of regulations, processes and standards?



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## Finance

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- Income/Expenditure
- Charges Regulations
- Fee-earning/Non-fee-earning work
- Cost recovery



20

## Key question

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**Does the BC service  
exercise their judgement  
correctly in respect of  
alternative routes to  
reaching compliance?**



21

## Key issues

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- Clear commitment needed for the shared service
- The Building Control Board isn't functioning as it should
- Staff validation and registration
- Communication
- There appears to be a 'disconnect' - how to frame the service?



22

## Governance

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LABC is currently in the process of obtaining legal advice on service delivery models and their governance, as soon as this is available a further short report will be issued with recommendations to consider



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## Reading

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- New Head of Service has had a positive impact and with the support of a relatively new member of technical support, is starting to turn things around – debt recovery still an issue
- Little if any resilience in terms of surveying staff (all agency)
- Management Accounts – require attention
- Having an experienced BC manager would prove beneficial



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# Thanks for listening

# Any questions?

Richard Scott – LABC Head of Member Support

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M:07741 636488



<b>TITLE</b>	<b>Strategic Asset Review</b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	(All Wards);
<b>LEAD OFFICER</b>	Deputy Chief Executive - Graham Ebers
<b>LEAD MEMBER</b>	Leader of the Council and Executive Member for Housing - Stephen Conway

**PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

The intention of the report is to transparently list the Council's assets to enable strategic and considered discussions around making best possible use of its assets in a responsible way, including the contribution that the property portfolio could make in generating financial savings. In doing this, numerous Council priorities should be considered, including the valuable services being provided by existing occupiers.

It is the first report it what will likely to be a long consideration of the principles of, the approach to and delivery of opportunities in the management of the property portfolio.

The reports sets out various workstreams that are progressing to identify and deliver opportunities for the consolidation and rationalisation of the property portfolio, to generate financial savings. This work will be reported back to Executive in due course.

Community and Corporate Overview & Scrutiny Committee considered this report and its content at their meeting on 28 February 2024. Executive are asked to consider their recommendations on this topic.

**RECOMMENDATION**

That the Executive

1. Notes the extent of the Council's property portfolio;
2. Notes the ongoing work under the Borough Assets Programme, considering and identifying opportunities for the rationalisation and consolidation of the property portfolio
3. Notes that the outputs of the Borough Assets Programme will be reported back to Executive in due course
4. Considers the recommendations from Community & Corporate Overview & Scrutiny Committee on 28 February 2024

**EXECUTIVE SUMMARY**

Wokingham Borough Council, like most local authorities, has a significant property portfolio which contributes to the direct delivery of services (such as libraries, schools,

leisure centres, care homes, parks and open spaces, affordable housing) or, indirectly through the generation of revenue income from commercial properties which can be used to fund service delivery. It is vital that Council assets are utilised to their optimum capability, both in delivering services and in financial terms. To achieve this, it is important to have a coordinated approach to property and land asset management, ensuring that assets are used in a way which generate Best Value to the authority

The report is in two sections:

- Section 1 provides information on the current property portfolio
- Section 2 sets out the current approach to reviewing and ensuring the most effective management and use of our property portfolio

By ensuring the most efficient use of our property portfolio, there are opportunities for assets to contribute to addressing the financial challenges faced by the Council. The paper sets out the statutory requirements of and challenges in managing the corporate estate, and asks Executive to note the ongoing work under the Borough Assets Programme which is considering and identifying opportunities for the rationalisation and consolidation of the property portfolio.

Outputs of the Borough Assets Programme, including those opportunities for the rationalisation (disposal) and consolidation of the property portfolio will be reported back to Executive in due course.

## BACKGROUND

Wokingham Borough Council, like most local authorities, has a significant property portfolio which contributes to the direct delivery of services (such as libraries, schools, leisure centres, care homes, parks and open spaces, affordable housing) or, indirectly through the generation of revenue income from commercial properties which can be used to fund service delivery. It is vital that Council assets are utilised to their optimum capability, both in delivering services and in economic terms. To achieve this it is important to have a coordinated approach to property and land asset management, ensuring that assets are used in a way which generate Best Value to the authority.

Holding a significant and varied property portfolio contributes to meeting a number of policy objectives of the authority:

- **Delivering high quality services** – buildings and assets form part of the authority’s public service delivery, such as education, highways & transport, social care, housing, public health, culture & related services, environmental & regulatory services, and central services. As each service is directly impacted by changes in need due to increasing or changing demand and legislative demand, the estate needs to respond effectively and responsively to meet these changing demands
- ***Delivers against Council Plan Priorities: Enriching lives; providing safe, strong communities; delivering the rights homes in the right places***
- **Delivering Value for Money** – the property portfolio makes a significant contribution to the financial performance and sustainability of the authority, either through income generation (rents) to contribute to funding service delivery, providing and developing property which enables efficient service delivery; or the generation of capital receipts through asset disposal. The “invest to save” model is important in this context – where the authority invests in property (either through acquisition or expenditure on developing or refurbishing assets) and then generates savings through the ability to deliver services more efficiently in and from improved property assets. Local authorities have a duty (under Section 123 of Local Government Act 1972) not to dispose of an interest in land for less than the best consideration reasonably obtainable, other than in the case of short tenancies, without the consent of the Secretary of State.  
***Delivers against Council Plan Priorities: Changing the way we work for you; Being the best we can be***
- **Partnership working** – the Council is committed to working with our partners in the community, as set out in the Community Vision. There may be opportunities for the Council to enhance and improve working with partners such as town and parish councils, public sector partners such as the NHS, and Voluntary & Community Sector (VCS), through utilising its property portfolio to accommodate partners and the services they deliver. Utilisation of the Council’s property portfolio in this manner can help to deliver best value in service delivery, service improvements or secure efficiencies.
- ***Delivers against Council Plan Priorities: Enriching lives; providing safe, strong communities; Changing the way we work for you***
- **Addressing Climate Change** – investment in and management of the property portfolio can contribute to delivery of the Climate Emergency Action Plan (CEAP), by

reducing energy and water consumption, as well as reducing CO2 emissions (decarbonising the estate), to ensure the built environment is managed and maintained to contribute to the achievement of zero carbon by 2030. The requirement to achieve Minimum Energy Efficiency Standards (MEES) is an important consideration when considering future investment in the construction, refurbishment and maintenance of the property portfolio.

- ***Delivers against Council Plan Priorities: Enjoying a clean and green Borough***
  
- **Regeneration** – the authority can directly invest in assets to generate additional social or economic benefits. Regeneration projects would usually have one or more of the following characteristics
  - a) the project is addressing an economic or social market failure by providing services, facilities, or other amenities that are of value to local people and would not otherwise be provided by the private sector;
  - b) the local authority is making a significant investment in the asset beyond the purchase price: developing the assets to improve them and/or change their use, or otherwise making a significant financial investment
  - c) the project involves or generates significant additional activity that would not otherwise happen without the local authority's intervention, creating jobs and/or social or economic value
  
- ***Delivers against Council Plan Priorities: Enriching lives***
  
- **Preventative action** – where the local authority involves direct financial support to local companies or acquiring assets as a way to protect jobs, prevent social or economic decline.
  
- ***Delivers against Council Plan Priorities: Enriching lives; Changing the way we work for you***

### *Structure of this paper*

This paper is in two sections:

- Section 1 provides information on the current property portfolio
- Section 2 sets out the current approach to reviewing and ensuring the most effective management and use of our property portfolio

Consideration of this report and to the effective management of the property portfolio by Executive and, by Community & Corporate Overview & Scrutiny Committee, will inform the development of the Asset Management Plan which the Council will be developing during 2024-25.

## **BUSINESS CASE**

### **THE COUNCIL'S PROPERTY PORTFOLIO**

The Council holds a wide and varied portfolio of property and assets, with a net book value of circa just under £500M (as at 31<sup>st</sup> March 2022).

The Council's portfolio can be split into seven main types of property:



1. Service delivery & operational – properties within which WBC direct service delivery happens, or which support service delivery:
2. Education sites (maintained or academised);
3. Commercial portfolio – assets which aim to maximise revenue income and are not utilised for direct WBC service delivery
4. Farms;
5. Parks & open spaces, including Country Parks and SANGs (Suitable Alternative Natural Greenspace);
6. Housing;
7. Highway assets

### *Parks & open spaces, Housing and Highways*

For the purposes of this report property areas 5, 6 and 7 are not included in the detailed analysis below. These areas are managed specifically by the relevant services (Housing, Place & Growth and Highways) and given their specific operational nature do not form part of the consideration of future opportunities for alternative service use and delivery.

### *Education sites*

There are 69 educational sites within the Borough (primary and secondary). In the last 3 years, two secondary schools and seven primary schools have been transferred to Academy Status. A further seven schools are planned to academise within the 2024-25 academic year, with an aim that all schools should have plans in place to join an academy trust by 2030. Given the specific operational nature of the education sites, they are out of scope for this particular review of alternative service use and delivery.

### *Service delivery & operational assets*

Service delivery and operational assets can be categorised based on the service that is offered from each building. This is summarised below and a full list of assets is included in Appendix A.

<b>Service</b>	<b>Property Requirements</b>	<b>Number of WBC owned assets</b>
<i>Leisure</i>	The Council's main leisure sites are managed by Places Leisure, through a leisure management contract. In recent years there has been significant capital investment by the Council in its leisure facilities, including at Carnival Hub, Wokingham (circa £20M) and Bulmershe Leisure Centre, Woodley (circa £13.5M).	8
<i>Libraries</i>	The Council owns and operates 10 libraries across the Borough. There is variety in the size and scale of the library provision, including operational hours/days and staffing (use of volunteers) and physical space within the venues.	10
<i>Adult Social Care</i>	ASC faces significant and increasing challenges in providing cost effective services to older persons	Care facilities – 6

	and to adults with physical disabilities, learning disabilities or physical or mental illnesses. Property has a vital role in providing suitable residential and day facilities to these different client groups.	Day Centres - 3
Childrens Services	In addition to education properties, Childrens Services utilise properties located out in the community to deliver services to young people including through Early Intervention and Early Help.	Childrens Centres – 6 Support Facilities – 5 Residential facilities - 3
Community	The Council owns a number of properties that are used for supporting and developing communities and provide services and facilities in the local area. Some of these properties are leased to partners – parish & town councils and community groups – who manage the day-to-day operation of the building. Some are retained and managed by WBC.	13
Corporate Offices	The Council has five corporate offices, all located within Wokingham town. The largest is the Council’s main headquarters building at Shute End. The offices provide a combination of back-office support functions, and also Customer Services front-facing customer interaction points.	5

### *Commercial portfolio*

The term “commercial portfolio” refers to properties which are not utilised for direct WBC service delivery. The overall aim of the Council’s commercial portfolio is to maximise revenue income which will contribute to the Council’s budget and support and finance the delivery of statutory services. In parallel, the commercial portfolio can also contribute to the delivery of other policy objectives as set out in the Introduction, in particular regeneration, economic development and environmental benefits.

### *Property Finance*

When considering the financial implications of property, it is important to consider and compare the on-going annual revenue rental income generated from tenants (minus landlord management costs), versus a one-off capital receipt that could be received from selling and disposing of the asset.

The key financial consideration is whether the value received for a disposal of the asset reduces the Council’s global borrowing and financing costs, more than the income receivable from holding the asset. The financing cost is made up of interest payments & Minimum Revenue Provision (MRP). In circumstances where the rental income would cover the financing costs and have additional residual income remaining, then under this financial assessment the asset is likely to be recommended to be retained as an income generating asset.

Local authorities have a duty (under Section 123 of Local Government Act 1972) not to dispose of an interest in land for less than the best consideration reasonably obtainable, other than in the case of short tenancies, without the consent of the Secretary of State. Previously capital receipts generated from asset disposal could only be used as a contribution to the Council's capital funding programme or to pay down capital borrowing debt. It could not be used to fund revenue services and budgets. A recent change in government policy now enables the use of capital receipts to fund "transformation" works and projects, which would normally be funded by revenue budgets. This ability to convert capital receipt into revenue provision is significant in altering the one-off nature of capital receipts into something with a positive budgetary impact on an on-going basis.

### *The Portfolio*

The commercial portfolio covers a wide variety of sectors, including office, retail and industrial & warehousing. The spread across sectors is important as it means the Council is not over-exposed to one particular part of the commercial sector and any particularly difficult market conditions that that sector may experience at any one time.

The commercial portfolio can be broken down into further sub-categories:

- a) Regeneration portfolio
- b) Investment portfolio
- c) Commercial estate portfolio
- d) Properties leased to rent-paying sports, social and community groups

### *Regeneration portfolio*

The Regeneration portfolio comprises of the commercial units constructed, owned and operated by the Council within Wokingham town as part of the Wokingham Town Centre Regeneration project. The redevelopment and regeneration of Wokingham town centre has been a major focus of the Council over the last decade, with investment of over £100M in the town centre, and Council retains the majority landownership in Wokingham town centre.

The Regeneration portfolio includes development at:

- Peach Place Refurbishment (Clarks Corner)
- Peach Place Regeneration (Peach Place Square & Peach Street)
- Elms Field, including Everyman, Aldi, Premier Inn and other commercial units
- 28-38 Peach Street (former M&S store)

A list of the assets is included in Appendix B.

At the time of the last valuations undertaken (March 2021) the capital value of the regeneration portfolio was circa £45M.

In 2022-23, the Regeneration portfolio gross passing annual rental income figure was £2.78M.

Occupation levels within the Regeneration portfolio remain high and are reported on as KPI RA4 within the Corporate Monitoring Reports. The table below sets out occupancy levels for the past 2 years

RA4 Occupancy rate of WBC-owned Regeneration units

	2022-23				2023-24			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Occupancy Rate	91.5%	92%	94%	96%	96%	97%	97%	
Target	90%	90%	90%	90%	90%	90%	90%	90%

### *Investment portfolio*

In September 2017 the Executive approved a property investment strategy aimed at generating revenue incomes from capital investment, as a direct response to the proposed reduction in Central Government funding in future years. To fund investment opportunities, the Executive approved the utilisation of Public Works Loan Board borrowing of up to £100m (within the MTFP 2018/19). An additional £100M was approved in the MTFP 2019/20.

At the time, excluding the Wokingham Town Centre Regeneration Programme, the Council's asst investment programme to date had been shorter term and lower risk and was yielding a modest return of 0.4% net return. In contrast, yields from commercial property investment presented an opportunity for greater returns, even allowing for the inherent risk and illiquidity in direct property ownership. There was therefore an opportunity for the Council to increase its risk profile by investing in income generating assets where typically the gross yield range from property investment could be 3-12%, with lower yields reflecting a more secure investment requiring less management.

To manage the risk exposure of investing in property, an Investment Protocol was developed so that each potential investment was considered on case-by-case basis using an evaluation methodology that must then go through the appropriate approval process, before any commitment to an acquisition is made. Executive in September 2017 gave delegated authority to the Director of Corporate Services [now Director of Resources and Assets], in consultation with the Leader, Executive Member for Finance, and Executive Member for Business, Economic Development and Regeneration [previous Executive title] for purchases totalling £100M.

The investment strategy evolved from the original 2017 strategy following the government's Public Works Loan Board (PWLB) review and publication of Circular 162 of 26th November 2020. Local Authorities may continue to borrow from PWLB to acquire property, but only for investments which contribute to specific permitted policy objectives related to Community Investment, being:

- Service delivery
- Housing
- Economic regeneration
- Preventative action
- Treasury management

Circular 162 is explicit that borrowing from PWLB can no longer be used for speculative purposes. This includes investment in property assets bought primarily for yield, which serve no direct policy purpose linked to the authority's core functions. Authorities are

also now constrained by only being allowed to invest within their own administrative boundaries.

In July 2021 the Executive approved a refocusing of the previously approved Investment Strategy to incorporate the objectives and criteria of wider community investment as set out in circular 162. The terminology used by the Council was changed from Property Investment Group, to Community Investment Group to reflect this change in policy.

Since 2018 the Council has invested circa £85M and acquired ten assets into the Investment Portfolio. Eight are located within the Borough, and two outside the Borough. A list of the assets is included in Appendix B

Any form of investment is not without risk since its value may rise or fall over time, especially where it is retained over many years. To mitigate the impact of uncertainty, objective of the investment portfolio has been to accumulate a spread of investments across many different opportunities including a variety of property types, sizes, building condition, locations and covenant strength, with varying degrees of risk.

At the time of the last valuations undertaken (March 2023) the capital value of the investment portfolio was £70.1M.

In 2022-23, the Investment portfolio gross passing annual rental income figure was £3.89M. After deductions for debt and repayment costs, this contributes net over £1M to Council revenue budgets.

Each year the Council publishes on its website a Property Investment Fund Statement relating to the properties within the Investment portfolio. The latest version of this statement, dated July 2023, is available on the Council website here - <https://www.wokingham.gov.uk/sites/wokingham/files/2023-07/Property%20investment%20Fund%20Statement%202023.pdf>.

### *Commercial Estate Portfolio*

The Commercial Estate portfolio consists of a number of assets in a variety of sectors, including industrial, retail and leisure sectors. The assets are leased to variety of tenants, all of whom pay a commercial rental income to the Council. A significant majority of the assets have been in the Council's ownership for a number of years.

A list of these assets is included in Appendix B.

In 2022-23, the Commercial Estate portfolio gross passing annual rental income figure was £1.68M.

Valuations of assets within this part of the portfolio are undertaken on a 5-year rolling programme so it is not possible to give an overall capital value of this part of the portfolio, and the valuation of properties would be considered on a case-by-case basis.

Occupation levels in the commercial estate portfolio remain consistently high. A majority of the tenants are long-standing tenants who have been in situ for a number of years. In addition, on the industrial estates/units we see a pattern of growth with our tenants who may start in one unit and as the business grows and develops they take on adjacent or

bigger units. This is a particularly important function of this part of the portfolio in supporting SMEs and the economic development of the Borough.

*Properties leased to rent-paying sports, social and community groups*

Within the Commercial Portfolio the Council has a number of assets that are leased by local sports, social and community groups and who pay a rent to the Council.

A list of these assets is included in Appendix B.

As at January 2024, the gross passing annual rental income figure for these properties was £184,000.

Valuations of assets within this part of the portfolio are undertaken on a 5-year rolling programme so it is not possible to give an overall capital value of this part of the portfolio, and the valuation of properties would be considered on a case-by-case basis.

**Farms**

The Council owns nine farms within the Borough, and one out of Borough farm holding. The majority of these farms have been in the Council’s ownership for a number of years, having been transferred to the Borough Council as part of the dissolution of Berkshire County Council.

The farms total an area of 105 hectares (261 acres). By default, they are greenfield (undeveloped) sites, some located on the edge of existing developed areas and some in rural areas. The Council’s ownership includes both the fields and farm buildings and farmhouses. Tenants are in place under a Farm Business Tenancy.

The total annual rental income generated by the farm holdings is £70,000 per annum.

A number of the Council’s farm holdings have been identified for alternative service uses. The promotion of some of the sites to the Local Plan for alternative uses was approved by the Executive in September 2023 within the report and decision entitled “*Promotion of Wokingham Borough Council Assets*”.

<b>Farm</b>	<b>Area of Borough</b>	<b>Promoted for use (approved by Executive Sep 2023)</b>
Great Lea House Farm, MereOak Lane	Grazeley	No promotion
High Barn Farm, Commonfield Lane	Barkham	Solar Farm Gypsy, Roma & Traveller site (part)
Brook Farm, Barkham Street	Barkham	SANG (Suitable Alternative Natural Greenspace)
Rooks Nest Farm, Barkham Street	Barkham	2 x SEND Schools Covid Memorial Wood
Mortimer Lodge Farm, Edneys Hill	Barkham	SANG (Suitable Alternative Natural Greenspace)

Church Farm, Wokingham Road	Hurst	No promotion
Winnersh Farm, Woodward Close	Winnersh	Part used for Oak Tree SEND School
Toutley East, Twyford Road	Wokingham	Housing and Care Home
Gray's Farm, Heathlands Road	Wokingham	Sports & Leisure, and community Use

### ***Voluntary & Community Sector (VCS) occupation of property***

The Council does have a number of Voluntary & Community Sector occupiers within it's Property portfolio, which are set out in the table below.

<b>Property</b>	<b>VCS Tenant</b>
The Hub, Waterford House, Wokingham	VCS organisations
Wokingham Citizen Advice Bureau, Waterford House, Wokingham	Citizen Advice Bureau
Barkham Road Pavilion (also known as Latimer Park Pavilion), Latimer Road, Wokingham	Men in Sheds
Former Wokingham Library, Denmark Street, Wokingham	SHARE
28-38 Peach Street, Wokingham (Former M&S)	Forces Support
Station House / Crisis House, Station Approach, Wokingham	Crisis House
RUBRA II, Mulberry Business Park, Wokingham	The Cow Shed
Seymour House, Denmark Street, Wokingham	First Days Childrens Charity
First floor, 3 Courtyard, Denmark Street, Wokingham	Ichthyosis Support Group
Bigshotte Park Pavilion, Holmebury Avenue, Crowthorne	Men in Sheds ( <i>proposed</i> )
(Part of) Wokingham Youth & Community Centre, 35 Reading Road, Wokingham	ARC (Youth counselling services)
Woodley Citizen Advice Bureau, Headley Road, Woodley	Citizen Advice Bureau

The practice of VCS partners occupying buildings which are vacant and have uncertainty about longer term plans or lack of prospective commercial tenants is a well-established property practice. VCS organisations are able to occupy buildings which otherwise may be outside of their budget on a short-term basis and in return the landlord does not have to incur the cost of empty building management (including business rates, utility standing charges, security). Assets are also occupied and “busy”, reducing the

negative impact on presence and aesthetic of an empty building can have on the surrounding area.

## **MAKING THE MOST EFFECTIVE USE OF THE PROPERTY PORTFOLIO – BOROUGH ASSETS PROGRAMME**

To ensure that the property portfolio continues to contribute in the most efficient way to service delivery and contributes to addressing the current and future financial challenges, the Council has been pursuing a number of workstreams and opportunities, to work the property portfolio harder and more effectively to generate savings.

There are significant interdependencies between workstreams looking at different properties and as such they are coordinated under the Borough Assets Programme. The multi-disciplined programme team consists of officers from the Commercial Property service, Finance, Adult Social Care, Childrens Services and Communities, Customer & Partnerships and is sponsored by the Director of Resources and Assets (S.151 officer) and the Chief Operating Officer.

### **A) Rationalisation and consolidation of Corporate office and Service/operational accommodation**

The key principles used to assess the best approach to managing the consolidation of Service Assets is as follows:

- Is the site being used to its full potential? Check opportunities to maximise utilisation and functionality
- Is the location and the need for the service location still relevant?
- Is the site fit for purpose? Is investment in the building required to enable improved service delivery?
- Maximise the potential of operational land and buildings for operational use by a Service, including consolidation of services into fewer assets
- Work with Services to facilitate projects which improve service delivery – this could include investment/improvement/refurbishment of existing buildings or creation of new capital assets
- If an asset is considered to be surplus for its current operational use, consider:
  - a) Suitability for a different Service / operational use; or
  - b) Potential to re-assign/redevelop for the purposes of revenue income; or
  - c) Opportunity to transfer the asset (community transfer or devolution); or
  - d) Appetite for disposal and generation of capital receipt

The consolidation of services into fewer assets is key to the strategy as it reduces on-going revenue costs from building operation and maintenance, and generates capital value from the disposal of assets no longer required.

In recent years, the Council has enacted changes to its service accommodation by co-locating and consolidating Services, to enact financial savings.

*VCS Hub at Waterford House*



In 2021, WBC teams were relocated from Waterford House at Erfstadt Court in Wokingham town centre into the main offices at Shute End. This made this building available for other uses, and the Council, working together with partners in the Voluntary and Charity sector, created the VCS Hub at Waterford House which enable the co-location of WBC services, directly with our VCS partners.

### *Carnival Hub, Wokingham*

The Carnival Hub opened in summer 2022, co-locating leisure and library services in one building in Wokingham town centre. Previously there had been a separate leisure centre and library. The spaces created in the Hub will allow further co-location of services and customer services in this location.

### *Consolidation at Shute End offices*

Over winter 2022-23, office accommodation at the Council's offices in Shute End was consolidated and two floors of the building were closed down. Teams have consolidated into the two remaining floors, facilitated by reduced attendance in the office, with a significant proportion of the workforce now working remotely from the office. The savings recovered from reduced operational costs of the buildings are £71,000 per annum.

The Borough Assets programme is looking at further opportunities for corporate office and service accommodation consolidation and rationalisation. Further opportunities for consolidation and rationalisation have been identified by services involved in direct delivery and matched with opportunities identified by Property colleagues who manage the property portfolio. Detailed design and costings work is currently being undertaken to identify implementation plans and confirm the feasibility of the opportunities identified. The outcomes and recommendations of this work are expected to be reported in the summer.

## **B) Future Headquarters provision**

In September 2023 the Executive considered the business case for the future provision of headquarters office accommodation for the Council and agreed that:

- i. the Council should review its office accommodation provision, including the opportunities for the relocation of its headquarters out of Shute End, to a more appropriately sized and more energy efficient building(s)
- ii. 28-38 Peach Street, Wokingham is the preferred alternative headquarters location and, subject to the approval of resources, will be the focus of more detailed feasibility and planning work
- iii. Approved a Supplementary Estimate of £175,000 within this financial year to fund feasibility, detailed design work and programme and project costs, including external consultancy support and expertise, for the alternative headquarter location
- iv. Noted that updates and outputs from the next stage of feasibility work will be reported back to the Executive.

Following this decision in September 2023, the project team have been working on the further feasibility work, as approved by the Executive. An experienced Programme Manager, with significant experience of local authority office relocation and

reorganisation has been appointed to manage this stage of the work. The feasibility work currently being undertaken includes:

- i. Further design and costing of options at 28-38 Peach Street, Wokingham, including IT provision and environmental performance of the building and options for car parking provision
- ii. Further design and costing of options for the provision of the Customer Front Door at the former Wokingham library on Denmark Street, Wokingham
- iii. Further design and costing of options for remaining in Shute End, which includes feasibility of options (including costings) of utilising the current closed space by 3<sup>rd</sup> parties. This work will enable a comparison with options for relocation.
- iv. Investigation and assessment of leasehold and freehold options for an alternative headquarters building in other parts of the Borough

The outputs of this feasibility work will inform a re-run of the business case originally presented in September 2023 and a like-for-like comparison between remain at Shute End and relocation, to either 28-38 Peach Street or a leasehold property. This updated business case and subsequent recommendations for how to proceed will be reported to O&S Committee and Executive later in the year.

### **C) Provision of Specialist Accommodation**

Specialist accommodation in Adults and Children Social Care make up a significant part of the Council's overall annual expenditure. Historically a large proportion of accommodation has been provided by independent or commercial providers, often at a higher cost and in some cases at considerable distance from the Borough. Recognising the benefit to residents, and with the need to lower costs, opportunities have been identified to convert, re-purpose or purchase accommodation to provide more in-house provision within the Borough at a lower cost. This work has been approached in three phases:

#### Phase 1 – Identification of need and accommodation requirements

Adult and Childrens Social care staff identified current and future service users who need accommodation as part of their care or leaving care plan.

#### Phase 2 - Matching accommodation needs with available properties

Cross-Council-workshops with Adults & Childrens Social Care, Property Services, and Housing staff were undertaken to look at available properties, including exploring vacant or underutilised Council buildings and opportunities for working in partnership with Registered Housing Providers and the Council's Housing company Loddon Homes.

#### Phase 3 - Adaptations and Improvements for Occupancy

Delivering a programme of capital works to make identified properties suitable for different service users. Works range from minor refurbishment to bring them up to acceptable living standards, through to extensions and remodelling to increase floor space and accommodation.

To date the programme has identified eleven buildings or accommodation units, with the first two properties scheduled for occupation in February 24. Work is underway to design, and commission works, agree allocation rights and for some units complete the property purchase. Occupation of these remaining nine units is scheduled to take place throughout the year.

In addition to financial savings, the specialist accommodation programme will deliver other key benefits including:

- Increased autonomy and independence for vulnerable Adults & Children in their own accommodation units.
- Greater links to local services and communities, previously some service users, particularly Care Leavers have been placed outside of the Borough because of the unavailability of local placements.
- Reduced travel time and cost for Social Workers to visit and support vulnerable Adults and Children.

The programme will continue to identify opportunities properties suitable for specialist accommodation, into the medium and long term.

#### **D) Commercial Portfolio Review**

The focus of this review is to consider the opportunities and approach for the potential disposal of some/any assets to generate a capital receipt. It will assess:

- the revenue income (rental value) generated by the asset
- capital value of asset
- tenancy security
- the policy objectives the asset contributes to
- the market attractiveness and liquidity potential of the asset
- the potential for alternative use

The key financial assessment is a comparison of the rental income generated by the asset, against the financing cost of holding the asset (interest & Minimum Revenue Provision (MRP)). In circumstances where the rental income would cover the financing costs and have residual income, then under this first test the asset is likely to be retained as an income generating asset.

From the review and knowledge of the market, it would not be appropriate for a whole-scale disposal of all or parts of the portfolio at one time, which has the risk of flooding the market and undermining the Council's opportunities to achieve best value.

It is proposed that a process and governance is created which enables a quarterly review and consideration of the opportunities for disposal or change in holding approach for assets within the commercial portfolio and that this review would be undertaken on an asset-by-asset basis. A considered Forward Programme of disposals for years 1-5 could be established, with associated financial savings targets.

#### **E) Asset opportunities with partners, particularly VCS and town & parish councils**

To date, the utilisation of WBC-owned property by VCS partners has been on a reactive basis, when property requirements from the VCS have been able to be matched with vacant or available properties within the portfolio, at that immediate time. This has

resulted in a range of properties being utilised by partners in a variety of different arrangements.

As part of the Borough Assets programme a review will be undertaken to identify how greater needs-based parity can be established in supporting the VCS with property provision, taking into account that the type and size of available property will be dependent on the particular circumstances at the time. Utilisation of WBC-owned property will need to be underpinned by a clear strategy with a contractual agreement based on needs and outcomes. The aim will be to co-locate wherever possible where needs are supported. Consideration also needs to be given as to how the balance can be achieved between the Council’s statutory obligation to secure Best Value from it’s property portfolio, whilst supporting our VCS partners through the use of property in service delivery and meeting the Council’s vision and objectives.

**FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	(£85,350)		Revenue
Next Financial Year (Year 2)	(£579,000)		Revenue
Following Financial Year (Year 3)	Saving target TBC		

<b>Other Financial Information</b>
A revenue budget savings target of £570,000 is included within the property budgets for 2024/25, to be realised through the consolidation, rationalisation and disposal of properties and assets, through the Borough Assets Programme. There are now further revenue opportunities from the use of flexible capital receipt arrangements which could come from the disposal of assets. This work will be explored alongside this project

<b>Legal Implications arising from the Recommendation(s)</b>
Include comments from legal officers, which set out all legal implications arising from the recommendations.

<b>Stakeholder Considerations and Consultation</b>
Consultation will be undertaken with service providers, partners, including town & parish councils, and the VCS, regarding the future use of properties and assets.

The change of use and/or re-development of a property may require planning consent, and public consultation on the proposals would happen through the statutory planning process.

**Public Sector Equality Duty**  
Equalities Impact Assessments will be required for individual proposals that change the use of buildings and provision and delivery of services.

**Climate Emergency – *This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030***  
Investment in and effective management of the property portfolio can contribute to delivery of the Climate Emergency Action Plan (CEAP), by reducing energy and water consumption, as well as reducing CO2 emission, through improving the environmental efficiency of the building fabric and occupation.

**Reasons for considering the report in Closed Session**  
n/a

**List of Background Papers**  
Appendix A – Service Delivery and Operational Assets  
Appendix B – Commercial Portfolio Assets

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## Appendix A

### List of Service delivery & operational assets

#### Leisure

Arborfield Green Leisure Centre, Sheerlands Rd, Arborfield
Loddon Valley Leisure Centre, Chalfont Close, Earley
Ryeish Green Sports Centre, Hyde End Lane, Ryeish Green
St Crispins Sports Centre, London Road, Wokingham ( <i>approval to close and transfer to The Circle Trust Spring 2024</i> )
Carnival Hub, Wellington Road, Wokingham
Boxing gym - BXGFIT, Peach Place, Wokingham
Bulmershe Leisure Centre, Woodlands Avenue, Woodley
Laurel Park Pavilion, Maresfield, Earley

#### Libraries

Arborfield Library, Arborfield Green Community Centre, Sheerlands Road, Arborfield
Lower Earley Library, Chalfont Close, Earley
Finchampstead Library, Gorse Ride North, Finchampstead
Shinfield Library, School Green Centre, Shinfield
Spencers Wood Library, Basingstoke Road, Spencers Wood
Twyford Library, Polehampton Close, Twyford ( <i>new facility to open at the Old Boys School, Polehampton Close in May 2024</i> )
Wargrave Library, Church Street, Wargrave
Winnersh Library, Robin Hood Lane, Winnersh
Wokingham Library - Carnival Hub, Wellington Road, Wokingham
Woodley Library, Headley Road, Woodley

#### Adult Social Care

<b>FACILITIES</b>
Suffolk Lodge, 18 Rectory Road, Wokingham
The Berkshire Care Home, 128 Barkham Road, Wokingham
Beeches Manor, Reading Road, Wokingham
Birches Extra Care, Woodlands Avenue, Woodley
Fosters, Fosters Lane, Woodley
Loddon Court (Ground Floor only), 289 Wokingham Road, Earley

<b>DAY CENTRE</b>	
<b>Location</b>	<b>Operator / Tenant</b>
Westmead Day Centre, Rances Lane, Wokingham	Optalis
Lady Elizabeth Day Centre (Land at Polehampton Close), Twyford	Age Concern
Earley Day Centre, 1 Kenton Road, Earley	Age Concern

#### Childrens Services

<b>CHILDRENS CENTRES</b>
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Finchampstead Childrens Centre, Gorse Ride North, Finchampstead
Red Kite Childrens Centre, St Mary's School site, Shinfield
Starlings Childrens Centre, Colleton School Site, Twyford
Rainbow Childrens Centre, Rainbow Park, Winnersh
The Brambles Children`s Centre, Budes Gardens, Wokingham
Ambleside Centre (Nurseries and Lend & Play Library), Ambleside Close, Woodley

### **SUPPORT FACILITIES**

Woodley Airfield Youth & Community Centre, Hurricane Way, Woodley
Here4U, 46 Church Road, Woodley
Bridges Resource Centre, Colemansmoor Road, Woodley
Wokingham Youth & Community Centre, Reading Road, Wokingham
<i>ARC (youth counselling service) are co-located in this facility</i>
The Palm Centre (formerly Wokingham Family Centre ), 12 Rectory Road, Wokingham

### **RESIDENTIAL**

2 Wormstall Cottages, Greensward Lane, Arborfield
3 Salmon Road, Whitley Wood, Reading
Seaford Court, Seaford Road, Wokingham

### **Community**

<b>Location</b>	<b>Tenant / managed by</b>
Earley Centrepoint Youth & Community Centre, Chalfont Close, Earley	Earley Town Council
Maiden Place Community Centre, Maiden Place, Earley	Earley Town Council
Radstock Lane Community Centre, Radstock Lane, Earley	Earley Town Council
Bradbury Community Centre (Salvation Army), Chalfont Close, Earley	Salvation Army
Earley Crescent Resource Centre, Warbler Drive, Earley	Earley Crescent Community Association
Twyford Youth & Community Centre, Loddon Hall Road, Twyford	Twyford CIO
Woosehill Community Hall, Emmview Close, Woosehill, Wokingham	Wokingham Town Council
Acorn Community Centre, Fernlea Drive, Woosehill, Wokingham	Optalis (part)
Montague Park Community Centre, William Heelas Way, Wokingham	<i>New facility, not yet operational Operational model TBC</i>
Pinewood Leisure Centre, Old Wokingham Road, Crowthorne	Wokingham Without Parish Council
Matthews Green Community Centre, Queens Road, Wokingham	<i>New facility, not yet operational Operational model TBC</i>
East Park Farm & Pavilion, Park Lane, Charvil	Charvil Parish Council

Arborfield Community Centre, Arborfield	<i>Note yet complete. New facility to be provided as part of Arborfield Green development. Operational model TBC</i>
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**Corporate Offices**

Wokingham Council Offices, Shute End, Wokingham

Waterford House (including VCS Hub), Efstadt Court, Denmark Street, Wokingham

Resource House and 1-4 The Courtyard, Denmark Street, Wokingham

The Courthouse - Prevention and Youth Justice Service, Efstadt Court, Denmark Street, Wokingham

Westcott Annex (1<sup>st</sup> Floor Offices) Westcott Road, Wokingham



**Appendix B**  
**List of Commercial Portfolio assets**

***Regeneration portfolio (Wokingham Town Centre)***

<b>Location</b>	<b>Address</b>	<b>Tenant</b>
Peach Place Regeneration	4 Peach Place	Mimi
	11 Peach Place	Maya's Refillables
	2 Peach St	Oliver Bonas
	4 Peach St	Waterstones
	6 Peach St	Greggs Plc
	8 Peach St	Sweaty Betty Ltd
	10 Peach St	Mountain Warehouse
	22 Peach St	Perfect Smile Dentist
	1-3 Rose St	Ripples
	5 Rose St	Vacant
	7 Rose St	Cook
	1 &2 Peach Place	Dabbawalla
	3 Peach Place	Leafy Elephant
	7 Peach Place	JJB Bars Ltd t/a Sit & Sip
	8/9 Peach Place	Coffee#1
	10 Peach Place	C&H Foods Ltd t/a Hamlet
	6 Peach Place	Ochre Box Ltd t/a Grilko
	20 Peach St	Gails
12 Peach Place	The Vale Clinic	
12a Peach Place	Boxing Gym (Places Leisure)	
Peach Place Redevelopment (Clarks Corner)	36 Market Place	Costa Coffee
	36a Market Place	Superdrug
	38/39a Market Place	Michael Fahami Ltd
	39 Market Place	Boots UK Ltd
	40 Market Place	Boots UK Ltd
	41 Market Place	Boots Opticians
	42 (and first floor 41)	Clarks
	Units 1 & 2 Bush Walk	Pret a Manger <i>(not currently operating)</i>
	Unit 3 Bush Walk	Maison Rustic
	Unit 4 Bush Walk	Antique Rose
	Unit 5 Bush Walk	Eden Lounge
	Unit 6 Bush Walk	Vitrasal Ltd
	Unit 7/8 Bush Walk	Strange the Jewellers
	Unit 9 Bush Walk	J Bluhm t/a Rococco Jewellers
Unit 10 Bush Walk	Vacant	
Elms Field	Unit 1 Elms Walk	Core Connexion Ltd
	Unit 2 Elms Walk	Funky Flowers Ltd
	Unit 3 Elms Walk	Arkdeal Ltd
	Unit 4 Elms Walk	Vacant
	Unit 5 Elms Walk	Salty Olive Ltd
	Unit 6 Elms Walk	T Rex Ltd t/a Pirates Landing

Location	Address	Tenant
	Unit 7A Elms Walk	Starbucks
	Unit 7B Elms Walk	Marcheck Ltd t/a Kutchenhaus
	Unit 7C Elms Walk	Fiona Parry
	Unit 8 Elms Walk	Inspirations
	Unit 9 Elms Walk	Peacock House Interiors
	Unit 10 Elms Walk	This Little Piggy
	Unit 11 Elms Walk	Ali Sahin
	Unit 12 Elms Walk	Sai Trades Ltd Glowfinity
	Unit 13 Elms Walk	Pratts Pods (tech. repair)
	Unit 14 Elms Walk	Jonrog Ltd t/a Back2Normal
	Unit 15 Elms Walk	The Wellness Clinic Wokingham Ltd
	Cinema	Everyman
	Supermarket	Aldi
	Hotel	Premier Inn
	Unit 1 Southgate House	Richard Young Art
	Unit 2 Southgate House	Hat & Home Ltd
	Units 3 & 4 Southgate House	Outhouse Brewery Ltd
26 Peach Street	26 Peach Street	Haka Chinese Takeaway
28-38 Peach Street	28-38 Peach Street	Forces Support Charity

### Investment portfolio

Site	Tenant(s)	Sector
31 Market Place, Wokingham, RG40 1AR	Barclays Bank <i>(Bank no longer operating from this location but lease remains in place &amp; rent demands are being paid)</i>	Retail
Units 1-6 Alexandra Court, Wokingham, RG40 2SL	Sew NoT Hollywood Nails Fat Lazy Frog Vacant unit x 1 PSH Consulting	Mixed
Fishponds Road, Wokingham, RG41 2QH	Cox Plastics	Industrial
Mulberry Business Park, Fishponds Road, Wokingham, RG41 2GY	<b>Alba House:</b> Citizen Watches Nouveau Nextgen Remedicare  <b>Rubra 1:</b> Acorah Vacant unit x 1  <b>Rubra 2:</b>	Office

Site	Tenant(s)	Sector
	The Cow Shed (VCS)	
Churchill Way, Basingstoke, RG21 6AA	Wickes	Retail warehouse
Cygnets Park, Peterborough, PE7 8JA	Stapletons	Industrial
London Road, Twyford, RG10 9EH	Waitrose	Supermarket
Resource House, Seymour House, 1-4 The Courtyard and 14-28 Denmark Street, Wokingham, RG40 2BQ	<p><b>Resource House &amp; No 20:</b> NHS</p> <p><b>Seymour House:</b> First Days Childrens Charity (VCS)</p> <p><b>1-4 The Courtyard:</b> Project Completion Services Peter Sloan Solicitors Support Horizons FCMi Ichthyosis Support Group (VCS) CPlus Iconic Project Management Vacant x 3</p> <p><b>No.s 14-28:</b> Toni &amp; Guy Rossini Yishoo Kaanaanmaa Wokingham General Store Aroma Wokingham Tandoori</p>	Mixed
Twyford House, Twyford, RG10 9EH	Day Lewis Pharmacy NISA Rebasoft Tesco Twyford Health Club Vacant unit x 1	Mixed
108-114 Crockhamwell Road, Woodley, RG5 3JW	Homes & Gifts Waitrose	Retail Supermarket

### **Commerical Estate Portfolio**

Property Address	Tenant	Sector
Cantley House Hotel (Cantley Park)	STEAMSHIP RECORDS LIMITED	Leisure

Land to the rear of Station Road	The Station Furniture Company Ltd	Land
Wokingham Superbowl	Big Apple (Superbowl) Limited	Leisure
1-13 Denmark Street (incl 1-7; 9-11,13), Wokingham	Designs for Living Interiors Ltd	Retail
The Plaza, Wokingham town	Aviva Life & Pensions UK Limited	Mixed: Retail, Offices & Leisure
Pipeyard (Open Storage Yard) Weller Drive Hogwood Lane Industrial Estate	Contract Options (West) Limited	Industrial/Storage
1-14 Weller Drive, Hogwood Lane Industrial Estate,	Various	Industrial
1a-9a Weller Drive, Hogwood Lane Industrial Estate,	Various	Industrial
Marino Way Units 1-15, Hogwood Industrial Estate, Wokingham RG40 4QY	Various	Industrial
Chalfont Surgery, Lower Earley District Centre	THE BROOKSIDE GROUP PRACTICE	Surgery/Medical
The Earley Retreat	Mitchells & Butler Retail (No 2) Limited	Leisure
Grovelands Avenue Workshops. Units A1-A8, B1-B9, C1-C7 & Garages 1-12 and Open Storage	Various	Industrial
Twyford Business Units 1-6, Twyford Business Park	Various	Industrial
California Country Park – Cafeteria & Kiosk	Jaswinder Brar	Leisure
Touring Caravan and Chalet Park - California Country Park	Kim Howard	Touring Park

\*Various small sites are also leased to Telecommunications infrastructure companies

### ***Properties leased to rent-paying sports, social and community***

<b>Property Address</b>	<b>Tenant</b>	<b>Sector</b>
Berkshire Aviation Museum	The Museum of Berkshire Aviation Trust	Aviation Museum
Suttons Bowls Club, Land and premises at Chalfont Way	Trustees of Suttons Bowls Club	Leisure

Land at Cantley Park - Wokingham Theatre	Wokingham Theatre Limited	Leisure
Wokingham Waterside Centre, Land at Thames Valley Park	Wokingham Waterside Centre Limited	Leisure
Land at Vauxhall Drive (2nd Woodley Scout Hut)	Scout Association Trust Corporation (on behalf of 2nd Woodley Scout Group)	Scouts
Cantley Park - Lease for use of Property for storage of materials and equipment	Bowmen of Burleigh	Cantley Park (R) (See 1903 also)
Pinewood Leisure Centre	Wokingham Without Parish Council	Pinewood Leisure Centre
Premises at Emmbrook Sports Field, Lowther Road	TRUSTEES OF EMMBROOK SPORTS CLUB	Emmbrook Sports Club
The Bungalow, Cantley House	TRUSTEES OF WOKINGHAM HOCKEY CLUB	Leisure
Ashridge Nursery - Lease for nursery premises (Land at Keep Hatch Primary School)	Ashridge Nursery CIO	Nursery
Chalfont Park Pavilion	Yellow Brick House Nursery Ltd	Nursery
Chestnut Park Pavilion (Yellow Brick Nursery)	Yellow Brick House Nursery Limited	Nursery
Earley Day Centre	Age Concern for South Woodley & Maiden Erlegh	Day Centre
Goals, 2 Woodlands Avenue, Woodley, RG5 3EU	Northwind 5S Ltd	Leisure
Land at Elizabeth Park, Pyke Close	South East Reserve Forces & Cadets Association (SERFCA)	Scouts
Royal County of Berkshire Sports & Social Club	Trustees of the Berkshire County Sports Club	Leisure
Land at Woodward Close (Winnersh Farm Allotments)	WINNERSH PARISH COUNCIL	Land

Land and premises at Sandford Mill Copse (Woodley ATC Hut - Off Mohawk Way)	South East Reserve Forces & Cadets Association (SERFCA)	Cadets Hut
Land at Bulmershe School, Woodley	South East Reserve Forces & Cadets Association (SERFCA)	Cadets Hut
Land at California Country Park (Scout Hut - 1st Finchampstead Scouts)	1ST FINCHAMPSTEAD SCOUT GROUP	Scouts Hut
Land at Colleton School Twyford (Little Acorns Pre-School)	Trustees of the Little Acorns Pre-School	Pre School
Land at Hawthorns Primary School	The Scout Association Trust	Scout Hut
Pre-School Building at Hillside Primary School	Yellow Brick House Nursery Limited	Pre School
Willow Bank Pre-School	Trustees of the Willow Bank Pre-School	Pre School
Land and Building at Bulmershe School (the Kingfisher Table Tennis Club - see also Site Code 1920)	Kingfisher Table Tennis Club	Leisure
Ground Floor Office, 75 London Road, Wokingham	Two Saints Limited	
Land at Southlake Crescent (1st Woodley Scout Hut)	The Scout Association Trust Corporation (on behalf of 1st Woodley Scout Group)	Scout Hut
Salvation Army Church, Chalfont Close, Earley	Salvation Army	Church / Community Centre

## **Community & Corporate Overview & Scrutiny Committee – 28 February 2024**

### **Minute Extract - Strategic Asset Review**

The Committee considered a report, set out at Agenda pages 5 to 34, which gave details of an ongoing strategic asset review. Appended to the report was a draft Executive report which provided details of the Council's property portfolio, thereby enabling a process for consideration of opportunities for rationalisation, consolidation and income generation.

Stephen Conway (Leader of the Council) attended the meeting to present the report and answer Member questions, supported by Sarah Morgan (Assistant Director – Commercial Property).

The report stated that the Council held a significant portfolio of property and assets with a net book value of circa just under £500m. Some of the assets were used for direct service delivery, including libraries, schools, leisure centres, care homes, parks and open spaces and housing stock. In addition, the Council held assets which generated income such as commercial properties and units in Wokingham town centre. In order to deliver value for money for the Borough's residents it was essential that these assets were managed effectively and efficiently. This included the contribution which the property portfolio could make to generating financial savings which could help to address the Council's challenging financial position.

It was confirmed that the list of assets appended to the draft Executive report was not comprehensive. It did not include parks and open spaces, housing and highway assets. These assets were managed by the relevant services and, given their specific operational nature, they were not included in the consideration of future opportunities for alternative service use and delivery.

The report requested that the Committee scrutinise the draft Executive report and make comments and/or recommendations to the Executive on the property portfolio and the key issues to address in the Council's approach to strategic asset management. Members were asked to give a view on the general principles underpinning the approach such as the balance between income and savings versus other key priorities such as partnership working or tackling the Climate Emergency.

In the ensuing discussion, Members raised the following points and questions for submission to the Executive.

In relation to its property portfolio, how did the Council compare with other local authorities? It was confirmed that the Council was on a par with other similar authorities, i.e. authorities with a significant rural element to the property portfolio.

Did the investment element of the portfolio generate a reasonable return to the Council? It was confirmed that, in 2022/23, the Investment portfolio delivered an annual rental income of £3.89m. After deductions for debt and repayment costs, this contributed over £1m to the Council's Revenue budget. In relation to the Regeneration portfolio, occupation levels remained high – 97% in Quarter 3 of

2023/24. Some vacant units had been used to support the voluntary and charitable sector, such as the Cowshed charity which provided support for residents during times of personal crisis.

What was the Council's approach to filling empty units, was it proactive or reactive? It was confirmed that, in relation to the commercial portfolio, the Council used agents at the local and national level. The approach was proactive. The Council also maintained frequent contact with voluntary partners in order to understand their needs and any upcoming pressure points. Work was also ongoing to repurpose some properties to address other priorities such as homelessness and the needs of care leavers. Members supported the approach of looking across the various sectors and seeking to establish a balance in the use of property assets.

Members noted the longer term plan to relocate the Council's headquarters from Shute End. At present, the top two floors of the Shute End offices were empty. Could these floors be used to accommodate voluntary/charitable partners? Another potential site was the former library in Denmark Street. It was confirmed that these sites were part of the development of a long-term plan for the Council's assets.

A report on the future Council headquarters would be submitted to Overview and Scrutiny and the Executive in late summer of 2024. Members supported the development of a longer term plan rather than ad hoc use of the Council's property assets. It was important to understand that, notwithstanding short term issues, voluntary and charitable partners needed as much certainty as possible in order to plan for the future. In addition, it was noted that some organisations were less able to speak up and articulate their requirements. In this respect, the development of a strong partnership approach was welcomed. It was also noted that the Council faced significant challenges itself. Creativity, transparency and communication would be key to the delivery of successful outcomes.

Members requested an update on the development of the flats next to the Carnival leisure site. This site was not included in the list of assets appended to the report. It was confirmed that this site should have been included in the construction section of the report. The original develop had gone into administration, resulting in a pause in the building works. A new contractor was in situ and it was expected that the flats would be completed by early 2025. Officers confirmed that the Council would not make a loss on the project.

What was the Council's approach to closer working with the Borough's Town and Parish Councils? It was confirmed that the Towns and Parishes were important partners and a key aim was to build a closer working relationship which identified opportunities for mutual support and benefit. These opportunities would be identified as part of the development of a longer term asset review.

Members noted that three community centres, Arborfield, Matthewsgreen and Montague Park, had not yet come on stream. What was the latest position? It was confirmed that talks were ongoing with Wokingham Town Council in relation to Matthewsgreen and Montague Park. In relation to Arborfield, the Council was working with the Parish Council and local community groups to identify a possible solution. Members suggested that there should be more communication with local



residents to reassure them that progress was being made in relation to these three centres.

In relation to commercial units, were tenants reporting difficulties in relation to rent levels, etc.? It was confirmed that all businesses were facing financial pressures. The Council's approach was proactive. Officers understood the challenges being faced and sought to work with the various tenants. It was suggested that future updates include details of the management of rents and the rationale for managing the cost base of commercial units.

Members noted that one of the significant challenges facing shops and stores was the move to on-line shopping which had been accelerated by the Covid pandemic. The fact that 97% of the town centre regeneration assets were occupied was a positive sign. The Council's role was to act as a curator of the town centres to find the correct balance of commercial, community and public service uses which reflected the needs of the Borough's residents. Members supported this approach and the development of a longer-term asset management plan in conjunction with key partners.

It was suggested that a further update report on the emerging Strategic Asset Review be submitted to the Committee in six months' time.

**RESOLVED** That:

- 1) Stephen Conway and Sarah Morgan be thanked for attending the meeting to present the report and answer Member questions;
- 2) a summary of Member comments and questions relating to the emerging Strategic Asset Review (as set out above) be submitted to the Executive;
- 3) a further update on progress relating to the Strategic Asset Review be submitted to the Committee in six months' time;
- 4) over the next six months, officers provide written updates to the Committee on progress relating to the Strategic Asset Review in order to keep Members up-to-date on key issues.

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<b>TITLE</b>	<b>Statement of Community Involvement (adoption)</b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	None Specific;
<b>LEAD OFFICER</b>	Director, Place and Growth - Giorgio Framaliccio
<b>LEAD MEMBER</b>	Executive Member for Planning and Local Plan - Lindsay Ferris

## **PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

The purpose of this report is to consider the adoption of a new Statement of Community Involvement (SCI). A review of the SCI is required by planning law every five years, which is now due.

The review ensures that residents, businesses and other interested parties will understand how the council will ensure effective community involvement at all stages in the land use planning process. Effective engagement ensures that decisions are made with reference to local opinion.

## **RECOMMENDATION**

That the Executive:

- 1) Notes the outcome of the consultation on the draft Statement of Community Involvement as set out in the Consultation Statement.
- 2) Adopts the Statement of Community Involvement (March 2024).
- 3) Publish the Consultation and Adoption Statement in order to give effect to the above recommendation.
- 4) Delegates to the Director of Place & Growth, in consultation with the Executive Member for Planning and Local Plan, to make any spelling or grammatical, typological or factual correction to the SCI and supporting documents.

## **EXECUTIVE SUMMARY**

The Statement of Community Involvement (SCI) is a document that sets how the council will ensure effective community involvement at all stages in the land use planning process. This includes the preparation of local plans, neighbourhood development plans, and supplementary planning guidance, as well as in the consideration of planning applications. It also sets out what is expected of those proposing developments.

The council is required by planning law to publish a SCI and review it every five years, which is now due.

A draft SCI was approved by the Lead Member for Planning and Local Plan in August 2023. The draft SCI included a number of improvements, including the proposal to extend the consultation period for major planning applications from the statutory requirement of 21 days to 28 days (excluding bank holidays). This change sought to ensure sufficient opportunity for residents and stakeholders to review such applications and provide comments, whilst balancing performance in decision making as required by the government.

The council consulted on the draft SCI for a six-week period between 4 September and 16 October 2023. A total of 28 representations were received and have been considered by officers in drafting the recommended SCI (March 2024). A detailed summary of all representations and recommended amendments to the SCI is set out in the accompanying Consultation Statement (Appendix A). A copy of the recommended final SCI is attached as Appendix B. The change to the consultation period for major planning applications was generally supported.

If the recommendation is agreed, the SCI (March 2024) will supersede the current adopted SCI which was adopted in 2019.

## **BACKGROUND**

The Statement of Community Involvement (SCI) is a document that sets how the council will ensure effective community involvement at all stages in the land use planning process. This includes the preparation of local plans, neighbourhood development plans, and supplementary planning guidance, as well as in the consideration of planning applications. It also sets out what is expected of those proposing developments.

## **BUSINESS CASE**

The council is required by planning law to publish a SCI and review it every five years.

The current adopted SCI was adopted in 2019. Since then, new engagement tools have emerged, and we have learnt new ways of engaging with our communities following the pandemic. A review of the SCI therefore ensures the council meets statutory duties. A review also provides the opportunity to refresh and clarify how engagement will be approached to anyone who is interested in the land use planning process.

Whilst a review of the SCI may be progressed without external engagement, the Executive Member for Planning and Local Plan approved a draft SCI for consultation, which occurred for a six-week period between 4 September and 16 October 2023.

The draft SCI included a number of improvements including the proposal to extend the consultation period for major planning applications from the statutory requirement of 21 days to 28 days (excluding bank holidays). This change sought to ensure sufficient opportunity for residents and stakeholders to review such applications and provide comments, whilst balancing performance in decision making as required by the government.

A total of 28 responses were received at the closure of consultation. These responses have been analysed and considered by officers. The main areas/issues raised can be summarised as follows.

- Requests that planning documents are made available in paper format at libraries and community hubs to support public engagement.
- Actions that are listed as 'may' should be more definitive and included in the 'we will' section when referring to both plan preparation and planning applications
- Representations submitted in response to planning applications and as part of preparing local plans are not fully considered, and are not answered in full.
- Requests that all consultees should be specifically named in the SCI.
- Various updates to correct typographical errors and ensure consistency and clarity.

The change to the consultation period for major planning applications was generally supported.

A detailed summary of all representations and recommended amendments to the SCI is set out in the accompanying Consultation Statement (Appendix A). A copy of the recommended final SCI is attached as Appendix B.

## **FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Nil	Yes  The costs of implementing the recommended SCI are contained within existing budgets.	Revenue
Next Financial Year (Year 2)	Nil	See above.	Revenue
Following Financial Year (Year 3)	Nil	See above.	Revenue

#### **Other Financial Information**

There are no direct financial implications of publishing the SCI. All work undertaken to update the SCI has been done within existing budgets.

The costs of implementing the recommended SCI are contained within existing budgets, with actions such as the proposed extension to the consultation period for major applications not changing the costs of consultation.

#### **Legal Implications arising from the Recommendation(s)**

Section 18(1) of the Planning and Compulsory Purchase Act 2004 states that “The local planning authority must prepare a statement of community involvement.” Section 18 sets out the matters that must be included in a SCI.

Section 18(3) of the Act provides that a SCI is a local development document. It is therefore subject to sections 17(8) and 23(5) of the Planning and Compulsory Act 2004, which state that local development documents must be adopted by resolution of the authority, and that they will only be local development documents insofar as they are adopted by resolution of the local planning authority. In accordance with Schedule 3, footnote 7 of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, functions relating to local development documents which are not development plan documents are the responsibility of the executive of an authority.

For these reasons, a resolution of Executive to adopt the recommended SCI amounts to a resolution of the local planning authority for these purposes.

Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that SCIs are reviewed every five years. This update to the SCI will bring ensure the council continues to meet this duty.

### **Stakeholder Considerations and Consultation**

Public consultation on the draft SCI was open for a period of six-weeks from 4 September and 16 October 2023. Consultation documents were made available on the council's website. Stakeholders were made aware of the consultation through notification to our planning consultation database and through a press release.

A total of 28 representations were received during the consultation period. As a result of these comments, some modifications are recommended.

### **Public Sector Equality Duty**

A Stage 1 Equalities Impact Assessment has been undertaken to support the preparation of the recommended SCI. The assessment concluded the recommendation would have a neutral or no impact.

Whilst it is acknowledged that a greater emphasis on digital engagement has taken place, the recommended SCI has been careful to consider the potential impacts of this on particular groups that may have limited access to digital mediums, such as older generations. The recommended approach to engagement has therefore sought to continue to engage these groups by utilising a range of consultation methods, including providing hard copies of documents in specific locations and hosting in-person events.

### ***Climate Emergency – This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030***

There is not considered to be a direct impact on the environment through the recommended SCI.

### **Reasons for considering the report in Closed Session**

Not applicable.

### **List of Background Papers**

WBC Statement of Community Involvement, 2019.

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**Service** Delivery and Infrastructure

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# Statement of Community Involvement

March 2024

## Consultation Statement



**WOKINGHAM**  
**BOROUGH COUNCIL**

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## 1. [Introduction](#)

### Purpose of this consultation statement

- 1.1 This consultation statement sets out the work involved in preparing the Statement of Community Involvement (SCI) (March 2024). It includes details of the consultation, the main issues raised in response to the consultation and the council's response to those issues.

### Background

- 1.2 The Statement of Community Involvement (SCI) is a document the council is legally required to publish under Section 18 of the Planning and Compulsory Purchase Act 2004 in order to explain how effective community involvement at all stages of the land use planning process will be achieved.
- 1.3 Local Planning Authorities are legally obliged to review their SCI's every five years to reflect changes to engagement and to respond to changes in policy. This requirement is derived from Section 10A(b) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

## 2. [Early engagement](#)

- 2.1 The preparation of a draft SCI was informed by informal discussion with Elected Members and council officers within the planning service and the communications, marketing and engagement team.
- 2.2 The draft SCI was presented to the council's cross party Planning Policy Member Working Group in July 2023.

## 3. [Formal consultation on the draft SCI](#)

- 3.1 Planning law and guidance does not require a local authority to undertake engagement or consultation with external stakeholders when reviewing an SCI. Notwithstanding, the council's Executive Member for Planning and Local Plan approved a draft SCI for consultation, which subsequently occurred for a six-week period between 4 September and 16 October 2023. The consultation provided an opportunity for residents and other external stakeholders to express their views on how the council intended to ensure how effective community involvement would be achieved.
- 3.2 The draft SCI was made available on the council's website, with a paper copy available at the council offices at Shute End, Wokingham.
- 3.3 External stakeholders were made aware of the consultation through notification being sent by email or letter. All individuals and organisations on the council's planning policy consultation database were sent notification. This the database includes all statutory consultees.
- 3.4 The consultation was further publicised through a press release.

## 4. Main issues raised and changes made

- 4.1 A total of 28 responses were received in response to the consultation from a combination of statutory consultees, including other local authorities, parish/town councils, local groups and residents.
- 4.2 A summary of comments made in representations is set out in Appendix A. This includes the council's response to the comment and details of amendments made to the SCI where relevant.
- 4.3 A summary of the main issues raised and any key changes made is set out below.

Main issue	Response and Key Changes
Planning documents should be available in paper format at libraries and community hubs.	Details of how people will be engaged in the planning process is set out in the SCI. It would be impractical and cost prohibitive to make paper copies of planning application plans and documents available.
Actions that are listed as 'may' should be more definitive and included in the 'we will' section	As set out in SCI paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.
Representations submitted in response to planning applications and as part of preparing local plans are not fully considered, and questions asked are not answered in full.	<p>The views of all consultees, including Town and Parish Councils are carefully considered.</p> <p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
All consultees should be specifically named in the SCI.	Whilst legislation specifically sets out the bodies a local authority must engage with under the duty to cooperate, it is not considered helpful to provide this with a list only reflecting a point in time, with experience suggesting that it would become out of date over time as bodies are restructured or renamed, e.g. Highways England became National Highways in 2023.
Various updates proposed to correct typographical errors and ensure consistency and clarity.	Noted and several changes made.

DRAFT

## Appendix A: Summary of representations on the Draft SCI and the council's response

This summary of representations presents individual comments made in representations in the order they relate to the draft SCI, with a separate schedule for each of the main sections of the SCI. The listed paragraph numbers correspond to the draft SCI.

General comments which relate to the draft SCI in general are set out in the first schedule. Other comments are set out in schedules relating to the specific schedule, with comments not relating to any specific paragraph listed first. Responses from individuals and councillors have been anonymised and assigned reference numbers.

List of those who made representations:

### Organisations:

- Arborfield Parish Council
- Barkham Parish Council
- Earley Town Council
- Finchampstead Parish Council
- Historic England
- Loddon Valley Rambles
- Natural England
- Ruscombe Parish Council
- Shinfield Parish Council
- Surrey County Council
- Transport for London
- Winnersh Parish Council
- Wokingham Society
- Wokingham Town Council
- Woodley Town Council

### Individuals:

- 12 respondents (ID1-12)

### Councillors:

- 1 respondent (CO1)

General comments not relating to a specific paragraph of the draft SCI

<b>Respondent</b>	<b>Summary of representation</b>	<b>Council response</b>
Transport for London	No comments to made on the draft SCI.	Comment noted.
Natural England	Supportive of the principle of meaningful and early engagement. Unable to comment in detail on the draft SCI.	Comment noted.
Historic England	Broadly support the SCI.	Support noted.
Historic England	Wonder whether it would be helpful to list all consultation bodies?	Whilst legislation specifically identifies some bodies as specific consultees, it is not practical to provide a comprehensive list of all consultation bodies due to the number of potential consultees and that any list could only reflect a point in time.
Historic England	Wonder whether it would be helpful to list all consultation bodies the council has a duty to cooperate with?	Whilst legislation specifically sets out the bodies a local authority must engage with under the duty to cooperate, it is not considered helpful to provide this with a list only reflecting a point in time, with experience suggesting that it would become out of date over time as bodies are restructured or renamed, e.g. Highways England became National Highways in 2023.  The benefits of providing a list and considered to be limited and of little consequence to ensuring effective engagement. No changes are proposed
Shinfield Parish Council	Broadly in agreement with the content of the SCI.	Support noted.

Respondent	Summary of representation	Council response
Winnersh Parish Council	Has no objections.	Comment noted.
Wokingham Town Council	Pleased to be consulted and have no comments.	Comment noted.
ID2	No actions which involve more expenditure than under current procedures, including printing, should be taken. Interested parties will respond in a timely manner. No proposals should delay planning decisions.	<p>Comment noted.</p> <p>The actions specified within the SCI are considered to be cost effective and allow consultations to be designed around the specific subject.</p>
ID2	Actions listed as 'may' are 'nice to have' and not 'essential'.	<p>Comment noted.</p> <p>As set out in paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.</p>
Barkham Parish Council	The statements in the SCI give the right impression but there is no indication where the substance is in them.	The SCI sets out actions that will and may be taken to facilitate engagement. It is unclear what is meant regarding substance, however in all instances, the council will carefully consider the views expressed in representations within the context of planning law and national policy/guidance.
Wokingham Society	Hyperlinks should be used to allow the reader to access referenced documents or legislation.	Suggestion noted.



Respondent	Summary of representation	Council response
		A review of the SCI has resulted in a number of additional hyperlinks being utilised throughout the document.
Earley Town Council	The adopted SCI makes use of graphics which are not included within the draft SCI. Would like to see the continued use of graphics to aid understanding.	<p>The respondent appears to be referring to the version of the SCI adopted in 2014, which was superseded in 2019.</p> <p>It is accepted that the inclusion of graphics can aid interpretation, however the draft SCI was drafted to simplify presentation and improve accessibility.</p>
Earley Town Council	The draft SCI appears to be a watering down of the adopted SCI, either omitting things or being more generalised.	<p>The respondent appears to be referring to the version of the SCI adopted in 2014, which was superseded in 2019.</p> <p>The draft SCI broadly maintains the approach of the SCI 2019, reflecting lawful requirements and extending consultation arrangements for major planning applications.</p>
ID10	The whole SCI is of no value. Developments are permitted in spite of objections and concern about the lack of technical information on how the building would be constructed, where drains would run, how deep footings would be and engineering figures to demonstrate the building materials would support the weight.	<p>The council wants to involve communities at all stages of the planning process. Community input can assist decision making by highlighting issues that need to be carefully considered or indicating preference for particular approaches.</p> <p>The council will not pretend that planning decisions are free of difficult choices. Decisions need to be made within legal requirements, have</p>

Respondent	Summary of representation	Council response
		<p>regard to national planning policy and guidance, and consider technical evidence.</p> <p>Detailed construction matters fall under building regulations and are outside the scope of land use planning.</p>
ID8	There is little in the draft SCI that is not agreed with.	Comment noted.
ID6	Comments that in general, sentences are overly long and complex.	<p>Comment noted.</p> <p>The draft SCI was reviewed by the council's Communications, Engagement and Marketing Team and subject to accessibility checking. Notwithstanding, some minor editing has been made to the document to further improve grammar.</p>
Woodley Town Council	Supports the draft SCI. Comments are provided on specific paragraphs.	Support noted.
ID5	<p>The consultation methodology is not appropriate in a modern era. The consultation should be available as an interactive HTML document. The pdf document doesn't open online.</p> <p>Biggest failure is to commit to using social media. Most people rely on this as their primary source of news. The draft SCI only says that social media 'may' be used.</p>	<p>Comment noted.</p> <p>The ability to download the draft SCI was checked at the launch of the consultation and several times following receipt of this comment. No problems were found at any time on testing.</p> <p>As set out in SCI paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of</p>

Respondent	Summary of representation	Council response
		<p>these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them. Publicising via social media is generally utilised for the local plan, supplementary planning, and neighbourhood development plans, however this is not a requirement of law and is therefore appropriately listed as 'may'.</p>
ID5	<p>Many links to documents do not work in desktop. Please ensure email and website links are accessible.</p>	<p>The hyperlinks within the draft SCI were checked at the launch of the consultation and several times following receipt of this comment. No problems were found at any time on testing.</p>
ID5	<p>Whilst inviting contributions where there is scope to influence decisions, it is also made clear that community opinion will not influence the outcome of consultations. Seen many planning applications allowed despite objections from the community. If people aren't able to influence the outcome, then tell them.</p>	<p>Comment noted.</p> <p>The council wants to involve communities at all stages of the planning process. Community input can assist decision making by highlighting issues that need to be carefully considered or indicating preference for particular approaches.</p> <p>As set out in SCI paragraph 2.2, the council will not pretend that planning decisions are free of difficult choices. Decisions need to be made within legal requirements, have regard to national planning policy and guidance, and consider technical evidence.</p>
ID5	<p>While encouraging site promoters to be open about their proposals, there are cases where developers have excluded large numbers of</p>	<p>Comment noted.</p>

Respondent	Summary of representation	Council response
	<p>people. Example given of Barkeley Homes and the promotion of Twyford Gardens. Fines should be imposed on developers who selectively engage and misrepresent opinion.</p>	<p>Draft SCI paragraph 7.12 sets out that the council would expect people proposing larger proposals to consult more widely before finalising their proposal and the submission of a planning application. There is no lawful mechanism for imposing fines.</p>
ID5	<p>In encouraging site promoters to engage before submitting a planning application, there is no definition of 'wider area'. Consultation might be with distant communities, allowing support to be claimed despite local opposition. The council should set clear boundaries beyond which a promoter should not be able to seek support.</p> <p>Similarly, comments on planning applications should only be open to people within a maximum radius, say five miles.</p>	<p>Draft SCI paragraph 7.12 sets out that the council would expect people proposing larger proposals to consult more widely before finalising their proposal and the submission of a planning application.</p> <p>There is no mechanism for the council to set boundaries or limits, however if contacted a view can be offered on what might be a suitable consultation framework.</p> <p>Best practice promoted analysis including the locational analysis of where representations were received.</p>
ID5	<p>There are dangers with planning applications being decided by the Planning Committee, with councillors having a vested interest in their community. This may lead to undesirable development being fostered on another community. Councillor input should be advisory, with the final decision taken by a professional officer.</p>	<p>Comments noted.</p> <p>Training is provided to councillors before they can sit on the Planning Committee. Where a councillor has an interest in an item, this must be declared by those on the Planning Committee and other committees. Where necessary, a councillor will be required to take no part in an agenda item.</p>

<b>Respondent</b>	<b>Summary of representation</b>	<b>Council response</b>
Arborfield and Newland Parish Council	How will the council engage local community groups and parish councils prior to publishing the draft local plan?	Draft SCI Section 4 outlines the engagement process for the preparation of local plans.
Finchampstead Parish Council	Feels the draft SCI contains helpful information and adds clarity.	Comment noted.

DRAFT

General comments not relating to the draft SCI

<b>Respondent</b>	<b>Summary of representation</b>	<b>Council response</b>
Ruscombe Parish Council	Details of permitted developments should be published to assist town/parish councils in identifying legal building works where planning permission was not required.	<p>An explanation of permitted development rights falls outside the scope of the SCI, which relates to engagement throughout the land use planning process.</p> <p>The national Planning Portal website provides a summary of permitted development rights which town and parish council may find useful.</p>
ID11	Development should not be permitted where crops are grown.	<p>Comment noted.</p> <p>The decision on where development should be permitted falls outside the scope of the SCI, which relates to engagement throughout the land use planning process.</p>
ID11	Infrastructure should be improved to support new houses, e.g. roads, schools, parking, power, sewage and leisure.	<p>Comment noted.</p> <p>The decision on where development should be directed and how infrastructure should be improved falls outside the scope of the SCI, which relates to engagement throughout the land use planning process.</p> <p>Notwithstanding, the council seeks to ensure infrastructure is improved to support new development. Through the local plan process engagement is undertaken with utility and other infrastructure providers. Where infrastructure need is identified, this is considered in the</p>

Respondent	Summary of representation	Council response
		preparation of planning policy and when determining planning applications.
ID1	More doctors' surgeries should be provided.	<p>The provision of doctors' surgeries falls outside the scope of the SCI, which relates to engagement throughout the planning process.</p> <p>Notwithstanding, the Integrated Care Board, and the predecessor organisations, has been and continue to be engaged through the planning process. Where the ICB identifies an infrastructure need, this is considered in the preparation of planning policy and when determining planning applications.</p>
Barkham Parish Council	Consultation with parish councils has improved, however matters that do not go through the planning process are not shared directly, with reference to a road closure. All items that affect residents should be shared with parish councils.	<p>Comment noted.</p> <p>Engagement by other services falls outside the scope of the SCI, which relates to engagement throughout the land use planning process.</p>
Earley Town Council	Comments that the town council receives complaints from residents saying they didn't know about planning proposals until the consultation period had passed. The requirement of displaying site notices improves local awareness.	<p>Site notices are sent to all agents/applicants with a request that it is displayed voluntarily. Where the law requires the council to display site notices it does so.</p> <p>The council is investigating the introduction of a new facility whereby local residents could sign up for automatic notifications of new planning applications.</p>

Respondent	Summary of representation	Council response
ID12	Comments that when the planning system is described as 'not being a democracy' engagement with the council is a waste of time with planning working to its own agenda and schedule.	<p>The council wants to involve communities at all stages of the planning process. Community input can assist decision making by highlighting issues that need to be carefully considered or indicating preference for particular approaches.</p> <p>As set out in SCI paragraph 2.2, the council will not pretend that planning decisions are free of difficult choices. Decisions need to be made within legal requirements, have regard to national planning policy and guidance, and consider technical evidence.</p>
ID4	Planning applications are inaccessible to the public. Whilst detail is important to the council, the public require a summary providing a brief description including impacts on environment, transport and infrastructure, and maps showing before and after.	<p>Planning law requires that the full details of a planning application are subject to consultation. Whilst it is accepted that aspects will be highly technical and complex, this information must be available to all.</p> <p>There is no legal basis for the council providing a summary of a planning application at the consultation stage and such a move would open up an area for legal challenge should people respond based on this and not the detailed matters. Providing a summary of planning application would be resource intensive and not possible within budgets.</p>
ID7	Is there a process of continual evolution of the local plan so that the current version doesn't fully expire when there are unavoidable delays to revisions in specific topic areas?	Under current planning law, it is possible to progress a partial update to a local plan. Notwithstanding, a comprehensive update to planning policy is necessary at this time.



Respondent	Summary of representation	Council response
ID	<p>There is insufficient accountability on social and civic infrastructure provision required to guarantee a healthy and safe quality of life. National Health Service, schools, parking facilities, road safety, traffic congestion etc. The council should be satisfied that improved infrastructure will be in place before a new dwelling is occupied.</p>	<p>The provision of infrastructure falls outside the scope of the SCI, which relates to engagement throughout the planning process.</p> <p>Notwithstanding, the council engages with a range of stakeholders in preparing planning policy and undertakes technical assessments. Where an infrastructure need is identified, this is considered in the preparation of planning policy and when determining planning applications.</p>
ID5	<p>Communities have been exposed by the failure to maintain a five year housing land supply with developers being more able to overturn a refusal. The delay has also places a burden on parish councils to produce neighbourhood plans without knowledge of what the next local plan will contain.</p>	<p>The matter of the housing land supply falls outside the scope of the SCI, which relates to engagement throughout the planning process.</p> <p>The council is in the process of preparing a new local plan which will ensure planning policies remain effective. Whilst the council has been unable to demonstrate a sufficient supply of deliverable housing land to meet five years need, this is a result of strong housing delivery which has exceeded requirements and reduced the bank of planning permissions yet to be implemented. The council has successfully argued in planning appeal processes that this bigger picture of delivery is material to decisions.</p>
Arborfield and Newland Parish Council	<p>Concerns regarding the Arborfield Green sports facilities and village centre show that consultation is not working. Particular concern regarding the time taken and the lack of</p>	XXX

Respondent	Summary of representation	Council response
	feedback. How will the council ensure that residents views are taken into account when plans take longer than expected and residents are informed of the reasons for delay?	The matter of infrastructure delivery falls outside the scope of the SCI, which relates to engagement throughout the planning process.
Arborfield and Newland Parish Council	In previous consultations, the council has posted letters in support of a particular site for development in preference to others. Is this not a form of predetermination?	It is unclear what is meant by letters in support of a particular site being published in preference.  All written representations in response to a planning application are published once process.
Arborfield and Newland Parish Council	Will SEA cover the full period of the local plan, e.g. where a development is proposed to extend beyond the plan period?	As set out in draft SCI paragraph 3.9, a sustainability appraisal is a process through which the effects of a local plan on economic, social and environmental objectives are considered. A sustainability appraisal also incorporates a further assessment process known as 'Strategic Environmental Assessment' which focuses on environmental impacts. Sustainability appraisals are iterative (i.e. subject to change and improvement over time), with the appraisal updated alongside each consultation stage of a local plan.  The SA and SEA will consider the impacts of the proposals contained within the plan.
Arborfield and Newland Parish Council	How will the council deal with consultation on locally significant proposed developments in the period to completion of the new local plan?	Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

Respondent	Summary of representation	Council response
		<p>Planning policies contained within the adopted which includes the Core Strategy and Managing Development Delivery local plans, and made neighbourhood development plans, will be the starting point for considering planning applications.</p> <p>The National Planning Policy Framework is a material consideration and will also be taken into account.</p> <p>The new local plan will become part of the development plan upon its adoption. At this point it will supersede both the Core Strategy and the MDD local plans.</p>
Arborfield and Newland Parish Council	Given national uncertainty about housing targets, possible relief of restrictions to building on the green belt and support for more renewable energy generation, how will WBC factor this into the development of, and consultation on, the Local Plan?	<p>The matter of the housing land supply falls outside the scope of the SCI, which relates to engagement throughout the planning process.</p> <p>The council is in the process of preparing a new local plan which will consider the implications of national planning policy.</p>
CO1	How are parish/town councils involved when the council claim they are partners but ignore them in many areas of business?	<p>Parish/town councils are a statutory consultee in the land use planning system and are consulted in both the preparation of local plans and when determining planning applications.</p> <p>Representations by parish/town councils are carefully considered alongside the views of</p>

Respondent	Summary of representation	Council response
		<p>others, technical information and planning law, policy and guidance.</p> <p>As set out in SCI paragraph 2.2, the council will not pretend that planning decisions are free of difficult choices. Decisions need to be made within legal requirements, have regard to national planning policy and guidance, and consider technical evidence.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>

Section 1: Introduction

Respondent	Section or paragraph	Summary of representation	Council response
ID6	1.1	Simplify sentence to: 'The Statement of Community Involvement (SCI) explains when, how, and for what reasons you will be able to be involved. This includes how you can be involved in local plans, neighbourhood development plans, supplementary planning guidance, planning applications, and planning enforcement.'	The specific proposal has not been taken forward, however paragraph 1.1 and 1.2 have been combined and simplified which accords to the intention of the comment.
Wokingham Society	1.2	Insert new paragraph after 1.2 reading: "It also indicates what is expected from those proposing developments."	Paragraph 1.2 amended as suggested.  Please note that paragraph 1.2 has been combined with paragraph 1.1 in response to other comments.
Wokingham Society	1.4	Correct grammar to final three bullets to read: "• Creating a sense of ownership of key planning policy documents. • Removing barriers (physical, language or social) and gives communities access to information and opportunities to voice their needs and opinions. • Creating accountability by generating a wider interest in monitoring outcomes."	Paragraph 1.4 amended as suggested.

Respondent	Section or paragraph	Summary of representation	Council response
CO1	1.4	How is there a greater focus on local needs and priorities? How are decisions informed by local knowledge? How is a sense of ownership created?	<p>Paragraph 1.4 outlines a number of benefits of involving communities in planning matters, including reference to needs and priorities and creating a sense of ownership.</p> <p>Through engagement, the council may become aware of needs which were not previously understood, e.g. infrastructure or types of housing).</p>
CO1	1.4	Increased community understanding in decisions is not achieved. Officers do not answer questions.	<p>It is incorrect that questions or expressed views are not taken into account.</p> <p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
CO1	1.4	Communities are not given information. Officers do not answer questions.	It is incorrect that information is not available or that questions or expressed views are not taken into account.

Respondent	Section or paragraph	Summary of representation	Council response
			<p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
CO1	1.4	People are not empowered. Officers do not answer questions.	<p>It is incorrect that information is not available or that questions or expressed views are not taken into account.</p> <p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
CO1	1.4	The council does not aim to make consultation and involvement	It is incorrect to state that consultations and involvement are

Respondent	Section or paragraph	Summary of representation	Council response
		transparent, accessible, collaborative, inclusive and consistent.	<p>not transparent and accessible. No example is provided.</p> <p>The SCI clearly sets out the actions the council will take to engagement throughout the planning process.</p>
Earley Town Council	1.6	Comment that 'accessible' is referring to people with access to digital technology and the ability to use it.	Whilst it is acknowledged that a greater emphasis on digital engagement has taken place, the SCI has been careful to consider the potential impacts of this on particular groups that may have limited access to digital mediums, such as older generations. The recommended approach to engagement has therefore sought to continue utilising a range of consultation methods, including providing paper copies of key documents in specific locations and hosting in-person events.
Earley Town Council		Comments that options listed under 'may' will rarely be used on the grounds of cost. Notes that many actions relate to people who are not able to access through digital technology.	As set out in paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.



Respondent	Section or paragraph	Summary of representation	Council response
			<p>Whilst it is acknowledged that a greater emphasis on digital engagement has taken place, the SCI has been careful to consider the potential impacts of this on particular groups that may have limited access to digital mediums, such as older generations. The recommended approach to engagement has therefore sought to continue utilising a range of consultation methods, including providing paper copies of key documents in specific locations and hosting in-person events.</p>
Finchampstead Parish Council	1.7	<p>The introduction of the word 'may' gives the council an option on what it wants to do which is not helpful. Suggest the use of 'intend' which implies the council will take the action.</p>	<p>As set out in paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.</p> <p>As set out in paragraph 2.4, the approach to consultation will be tailored to the specific issues, audiences and the scale of proposals, so that it is fit for purpose for the subject being</p>

Respondent	Section or paragraph	Summary of representation	Council response
			consulted on, making it easier for people to take part.
ID6	1.7	Simplify sentence to: 'We set out what the law says we must do. Any other options we have which go beyond lawful requirements, will be used where practicable or appropriate.'	The specific proposal has not been taken forward, however paragraph 1.7 has been amended to simply the text which accords to the intention of the comment.
CO1	1.7	Planning officers should stop using the words 'on balance' when making recommendations not compliant with policy.	<p>Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.</p> <p>The structure of planning law therefore requires a decision to be made on balance. This balance may be in accordance with the development plan or towards an exception to aspects of the development plan where material considerations provide justification.</p>

Section 2: Principles of community involvement

Respondent	Section or paragraph	Summary of representation	Council response
CO1	2.1	The council tends to ignore residents who have an opposite view.	<p>It is incorrect that expressed views are not taken into account.</p> <p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
Finchampstead Parish Council	2.2	More clarity is needed on how the council will engage with the public, how proactive you intend to be and how planning is managed and processed. All documents should be available in paper libraries and community hubs.	<p>Paragraph 2.2 refers to the principles of community involvement. Details of how people will be engaged in the preparation of local plans, supplementary planning and planning applications is set out in the subsequent sections.</p> <p>With regards to planning policy documents, actions include making specified documents available at council offices as well as online.</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>It would be impractical and cost prohibitive to make paper copies of planning application plans and documents available at council offices.</p>
CO1	2.2	<p>Positive engagement, as a general rule, means doing what an applicant wants not what residents might want. Localism plays no part, or very little part, in the council's thinking. The words 'on balance' is how it works in reality.</p>	<p>All planning applications are considered on their merits.</p> <p>Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.</p> <p>The structure of planning law therefore requires a decision to be made on balance. This balance may be in accordance with the development plan or towards an exception to aspects of the development plan where material considerations provide justification.</p> <p>It is incorrect that expressed views are not taken into account.</p> <p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
CO1	2.3	<p>The minimum is probably the correct unless the words 'on balance' can be used to approve schemes not supported by residents.</p>	<p>Paragraph 2.3 refers to the council complying with legislation as a minimum. The comment to the minimum being the right thing is noted, however as set out in the SCI there are a number of options which the council may take beyond legislative requirements.</p> <p>The comment of the minimum being right is inconsistent with responses to other parts of the draft SCI.</p>
Finchampstead Parish Council	2.4	<p>More clarity is needed on how the council will engage with the public, how proactive you intend to be and how planning is managed and processed. All documents should be available in paper at libraries and community hubs.</p>	<p>Paragraph 2.2 refers to tailoring the approach to consultation to the specific topic, audience and scale of the proposals.</p> <p>Details of how people will be engaged in the preparation of local plans, supplementary planning and planning applications is set out in the subsequent sections.</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>With regards to planning policy documents, actions include making specified documents available at council offices as well as online.</p> <p>It would be impractical and cost prohibitive to make paper copies of planning application plans and documents available at council offices.</p>
CO1	2.4	The council does not tailor its approach to the specific issue, audience or scale of proposal. Fit for purpose means what planning officers want.	<p>Whilst the council may choose to similar approaches to consultation for matters, it is not correct to state the approach to consultation is not tailored to the issue.</p> <p>Example of where the approach differs include the masterplanning studies.</p> <p>The approach to consultation is discussed with Members who are able to recommend changes if necessary.</p>
Earley Town Council	2.5	The document fails to explain how engagement will be designed to be accessible and how better inclusion of everyone will be achieved.	It would not be practical for the SCI to set out how engagement might be undertaken in all instances.

Respondent	Section or paragraph	Summary of representation	Council response
		<p>Notes that options which are not digital are mostly listed under 'may' and are not used.</p> <p>Notes that reference is made to a small number of groups such as the young, but no reference is made to those who are not computer literate.</p> <p>The statement should consider its relevance to the eleven protected characteristics as defined in equalities legislation.</p>	<p>As set out in paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.</p> <p>Whilst it is acknowledged that a greater emphasis on digital engagement has taken place, the SCI has been careful to consider the potential impacts of this on particular groups that may have limited access to digital mediums, such as older generations. The recommended approach to engagement has therefore sought to continue utilising a range of consultation methods, including providing paper copies of key documents in specific locations and hosting in-person events.</p> <p>The potential disadvantages of relying entirely on digital engagement is expressly recognised in paragraph 2.9.</p>
CO1	2.5	With regard to the principles of involving communities:	It is incorrect that expressed views are not taken into account.

Respondent	Section or paragraph	Summary of representation	Council response
		<ul style="list-style-type: none"> <li>• The council encourages communities to contribute but then ignores them.</li> <li>• Transparency is not obvious as a whole and particularly in the planning department.</li> <li>• Asks for examples of method used to engage people.</li> <li>• Town/parish councils or councillors are not engaged.</li> <li>• There is no evidence that representations are analysed and, where appropriate, feedback is given.</li> <li>• Agrees that personal data is redacted.</li> <li>• Comments the council may not like but are relevant should not be ignored. The council does not record phone calls which is unprofessional.</li> </ul>	<p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p> <p>In the case of plan making, reports on consultations are published setting out the main issues raised.</p> <p>The reference to rejecting representations is clearly set out in the context of profanities or statements considered derogatory or offensive to persons sharing a protected characteristic (such as disability, race, religion and others). It is considered correct to reject such representations. It should be noted that the writer of rejected representations will be written to, outlining the reasons why. An amended representation would be accepted.</p>



Respondent	Section or paragraph	Summary of representation	Council response
CO1	2.7	The council is not keeping residents updated with progress while they continue to negotiate with the developer until a decision is made undermines resident involvement and is a lack of openness and transparency.	<p>Paragraph 2.7 relates to landowners that are considering whether to proceed with a proposal. It does not relate to the circumstance of where a planning application has been submitted.</p> <p>Notwithstanding, where a planning application is amended by the applicant, any material amendments are subject to a further period of consultation, allowing residents and other stakeholders to provide their views on any changes.</p>
CO1	2.8	Public, town/parish council access too this would be good.	Paragraph 2.8 acknowledges the greater use of digital technology and the benefits it can bring. It is unclear what access is being requested with parish/town councils being able to benefit in the same way as other stakeholders.
Earley Town Council	2.9	It is good that the disadvantages of relying on digital technology is recognised, however most methods that are not digital are listed under 'may'.	<p>Comment noted.</p> <p>Whilst it is acknowledged that a greater emphasis on digital engagement has taken place, the SCI has been careful to consider the potential impacts of this on particular groups that may have</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>limited access to digital mediums, such as older generations. The recommended approach to engagement has therefore sought to continue utilising a range of consultation methods, including providing paper copies of key documents in specific locations and hosting in-person events.</p>
Woodley Town Council	2.9	<p>There should be a strong statement to ensure access to paper copies, e.g. encouragement of Town and Parish Council to publicise information; promote access to internet at libraries and council offices.</p>	<p>Paragraph 2.9 relates to the principles of community involvement. Actions listed under subsequent sections state that paper copies of documents will be available at council offices, with other locations considered.</p> <p>The council supports parish and town council making information available to their communities.</p>
CO1	2.9	<p>Comments weakness of relying entirely on digital technology must be addressed. Printed information is needed also.</p>	<p>The paragraph refers to the principles of community involvement. Details of how people will be engaged in the preparation of local plans, supplementary planning and planning applications in the relevant latter sections.</p> <p>Whilst it is acknowledged that a greater emphasis on digital</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>engagement has taken place, the SCI has been careful to consider the potential impacts of this on particular groups that may have limited access to digital mediums, such as older generations. The recommended approach to engagement has therefore sought to continue utilising a range of consultation methods, including providing paper copies of key documents in specific locations and hosting in-person events.</p> <p>It would be impractical and cost prohibitive to make planning application plans and documents available at council offices.</p>

Section 3: Planning for the future of Wokingham Borough

<b>Respondent</b>	<b>Section or paragraph</b>	<b>Summary of representation</b>	<b>Council response</b>
Wokingham Society	3.2	Correct grammar to read: “consulting on [not ‘in’] planning applications”	Paragraph 3.2 amended as suggested.
CO1	3.6	If a local plan includes a site where development is scheduled beyond 15 years, then the full infrastructure costs of the whole development must be calculated and allowed for.	<p>Paragraph 3.6 refers to the minimum period for a local plan as set out in national planning policy as being 15 years from adoption.</p> <p>Under national planning policy, all site housing allocations must be developable. This means being in a suitable location with a reasonable prospect they will be available and can be viably developed at the point in time envisaged. Viability considers the costs of infrastructure over the whole delivery period of an allocation, including those delivered beyond 15 years.</p>
CO1	3.7	If a local plan includes a site where development is scheduled beyond 15 years, then the full infrastructure costs of the whole development must be calculated and allowed for.	<p>Paragraph 3.6 refers to the minimum period for a local plan as set out in national planning policy as being 15 years from adoption.</p> <p>Under national planning policy, all site housing allocations must be developable. This means being in a suitable location with a reasonable</p>

Respondent	Section or paragraph	Summary of representation	Council response
			prospect they will be available and can be viably developed at the point in time envisaged. Viability considers the costs of infrastructure over the whole delivery period of an allocation, including those delivered beyond 15 years.
Wokingham Society	3.8	Reference to 'made' with regard to neighbourhood development plans should be explained. Suggested additional text in brackets after 'made' "(ie adopted)".	Paragraph 3.8 amended as suggested.
Wokingham Society	3.9	The use of 'iterative' may not be understood. Suggested additional test (ie subject to change and improvement over time)"	Paragraph 3.9 amended as suggested.
Woodley Town Council	3.9	The council should consider the pollution of watercourses and how best to ensure developers are aware of their responsibilities.	As set out in paragraph 3.9, a sustainability appraisal is a process through which the effects of a local plan on economic, social and environmental objectives are considered. A sustainability appraisal also incorporates a further assessment process known as 'Strategic Environmental Assessment' which focuses on environmental impacts. Sustainability appraisals are iterative (i.e. subject to change and

Respondent	Section or paragraph	Summary of representation	Council response
			<p>improvement over time), with the appraisal updated alongside each consultation stage of a local plan.</p> <p>The SA and SEA will consider the impacts of the proposals contained within the plan. Detailed planning policies on pollution would form part of a local plan.</p>
CO1	3.9	The SEA must include all the elements of any site scheduled beyond the statutory 15 year plan.	<p>As set out in draft SCI paragraph 3.9, a sustainability appraisal is a process through which the effects of a local plan on economic, social and environmental objectives are considered. A sustainability appraisal also incorporates a further assessment process known as 'Strategic Environmental Assessment' which focuses on environmental impacts. Sustainability appraisals are iterative (i.e. subject to change and improvement over time), with the appraisal updated alongside each consultation stage of a local plan.</p> <p>The SA and SEA will consider the impacts of the proposals contained within the plan.</p>

Respondent	Section or paragraph	Summary of representation	Council response
CO1	3.10	Understand that Supplementary Planning Documents set out more detailed guidance to further explain policy and that they are a material planning consideration.	Comment noted.
Earley Town Council	3.11	Is it relevant in the context of 2023 to continue to apply inflation to adjust CIL rates? CIL rates should be overhauled with increased demands on infrastructure.	<p>As set out in paragraph 3.12 the Community Infrastructure Levy is a charge per square metre which can be levied by local authorities on new development to help deliver the infrastructure needed to support growth.</p> <p>The council adopted the current CIL charging schedule in 2015, which have subsequently been adjusted for inflation.</p> <p>The adjustment of rates for inflation is in accordance with planning law. Notwithstanding, a full review of the charging schedule is proposed to run in parallel with the emerging local plan.</p>
CO1	3.12	Will CIL remain or be replaced?	The council currently implements a Community Infrastructure Levy (CIL) charging schedule. The Levelling Up and Regeneration Act 2023 enables the government to introduce a new Community Levy system. This is

Respondent	Section or paragraph	Summary of representation	Council response
			intended by the government to replace CIL in time, however this is expected to occur over a ten year period. It is likely that the council will operate a CIL changing schedule over the medium term. A full review of the charging schedule is proposed to run in parallel with the emerging local plan.

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Section 4: Engagement process for local plans

Respondent	Section or paragraph	Summary of representation	Council response
Arborfield and Newland Parish Council	4	The consultation for the Revised Local Plan took place fall over December 2021. Can the council commit to not holding consultations at a time when consultees are likely to be distracted, e.g. Christmas, Easter, August?	The minimum consultation period for a local plan is six-weeks. Whilst it is recognised that consulting over holiday periods will inconvenience some, the length of the consultation period is of sufficient length to enable interested people to consider the published material and respond. The SCI confirms that the period of consultation excludes bank holidays.
Arborfield and Newland Parish Council	4	The Revised Local Plan consultation included only two public meetings, neither of which included a public question and answer session. Two online meetings also gave very little opportunity to ask questions. How will the council ensure that consultees are consulted early and have a genuine opportunity to influence the outcome?	<p>The Revised Strategy Consultation included two in-person events where the officers from the planning policy, development management, highway teams were available to answer questions. Information on the proposals way available on display boards and supported with maps.</p> <p>Experience has shown that formal question and answer sessions do not allow effective engagement. An informal drop-in or ‘market place’ event allows a greater number of people to engage with officers on a broader range of matters.</p>

Respondent	Section or paragraph	Summary of representation	Council response
			The two virtual meetings took the form of a briefing followed by questions. People were invited to submit questions in advance.
Earley Town Council	4.3	This section does not mention public consultation.	Paragraph 4.1 provides lists the five broad stages of local plan preparation. A number of the stages involve consultation as detailed in the paragraphs which follow.
Historic England	4.4	Support reference to Historic England.	Support noted.
Wokingham Society	4.4	How to you define civic amenity groups?	<p>Paragraph 4.4 lists local organisations and societies, providing the example of civic amenity groups. The example does not relate to any legal definition.</p> <p>The paragraph has been amended to refer to ‘civic or amenity groups’ to avoid any potential for misinterpretation.</p>
Earley Town Council	4.4	The list of bodies required by law to engage with does not include residents, only mentioning individuals who have asked to be kept informed.	Paragraph 4.4 lists a range of specific consultees the council is required to engage with in the preparation of a local plan. Residents are not a specific consultee but would be engaged through the requirements to publish

Respondent	Section or paragraph	Summary of representation	Council response
			the local plan and invite representations.
CO1	4.4	All consultees should be listed. Parish/town councils are listed but tend to be ignored.	<p>Whilst legislation specifically identifies some bodies as specific consultees, it is not practical to provide a comprehensive list of all consultation bodies due to the number of potential consultees and that any list could only reflect a point in time</p> <p>It is incorrect that expressed views are not taken into account.</p> <p>Representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p> <p>In the case of plan making, reports on consultations are published setting out the main issues raised</p>

<b>Respondent</b>	<b>Section or paragraph</b>	<b>Summary of representation</b>	<b>Council response</b>
Historic England	4.6	Suggests reference to early engagement on plan-making and early engagement with statutory consultees is referenced, perhaps via the addition of a new bullet.	New bullet added to refer to engage with statutory consultees on evidence base and the consideration of potential policy direction.
Wokingham Society	4.6	Change grammar to insert a comma after 'for example' was replaced by 'by'.	Bullet amended as suggested.
Earley Town Council	4.6	Comment that there is no mention of other ways of notification other than the council website.	<p>Paragraph 4.6 requires that the council provide notice of its intention to prepare a local plan on the council's website. Reference is also made to a range of other actions including engagement and the use of press releases, e-newsletter, and press releases.</p> <p>Paragraph 4.7 identified several additional actions that may be taken. These includes the use of posters, leaflets, or postcards.</p>
CO1	4.6	<p>With regard to actions that will be taken:</p> <ul style="list-style-type: none"> <li>• More engagement is needed with town/parish councils where a plan is dragging on.</li> <li>• Issuing information through press releases, e-newsletters</li> </ul>	<p>Comments noted.</p> <p>It is recognised that a local plan process may extend over a number of years. Updates on planning policy, including activities relating to the local plan have been provided at planning training events which are</p>

Respondent	Section or paragraph	Summary of representation	Council response
		and social media is helpful but more is needed.	open to Borough Members and parish/town council.
CO1	4.7	Actions listed as 'may' should be amended to 'should'.	As set out in paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.
CO1	4.8	Keep interested parties informed regularly.	It is recognised that a local plan process may extend over a number of years. Updates on planning policy, including activities relating to the local plan have been provided at planning training events which are open to Borough Members and parish/town council. The planning policy newsletter has been used to update interested parties on a periodic basis.
Wokingham Society	4.9	Insert hyperlink to the National Planning Policy Framework.	Paragraph 4.9 amended to make National Planning Policy Framework a hyperlink.
CO1	4.9	Comments it is good that the council will publish the proposed submission plan and invite representations.	Comment noted.

Respondent	Section or paragraph	Summary of representation	Council response
			Publication of the proposed submission local plan is a statutory requirement.
Wokingham Society	4.10	Suggest revisions to improve clarity of fifth bullet. Suggest: “Make all statutory publication documents, including the consultation statement, available for inspection electronically or in paper form or both at the council office”.	Bullet amended as suggested.
Earley Town Council	4.10	Comments that documents should be available both electronically and in paper.	Bullet amended to clarify that statutory documents will be available in paper form at council offices.
CO1	4.10	Paper copied of statutory documents also to parish/town councils.	<p>The bullet referred to making paper copies of statutory documents available at the council office. Paragraph 4.11 refers to considering making documents available at main libraries.</p> <p>The council would support parish/town councils printing and making information available to their communities.</p>
CO1	4.11	A press notice should be published in all newspapers.	Planning law does not require that local plan consultations are publicised in newspapers.

Respondent	Section or paragraph	Summary of representation	Council response
			<p>Notwithstanding this action has been taken in the past.</p> <p>The issuing of a press release enabled newspapers and other media outlets the opportunity to note the publication.</p> <p>It is impractical and cost prohibitive for notice to be placed in all newspapers.</p>
Wokingham Society	4.12	<p>Suggest revisions to improve clarity: “the Inspector will consider all representations and evidence and then identify areas to be investigated further. The Inspector will set specific questions...”</p>	<p>Paragraph 4.12 amended as suggested.</p>
CO1	4.13	<p>With regards to actions that will be taken at examination stage:</p> <ul style="list-style-type: none"> <li>• Notice of the hearing should ideally be earlier than 6 weeks.</li> <li>• Paper copies of examination documents should be available at council offices, libraries and parish/town councils.</li> </ul>	<p>Planning law requires that 6-weeks’ notice is required. Whilst earlier notification may be possible, this is dependent on the receipt of information from the appointed Planning Inspector.</p> <p>It is impractical and cost prohibitive for paper copies of examination documents to be available in paper copies.</p>

Respondent	Section or paragraph	Summary of representation	Council response
Earley Town Council	4.14	Comments that 'may' options will rarely be used. Reconsideration is required given the importance of the examination.	<p>Paragraph 4.14 refer to the plan examination stage. At this stage the Inspector appointed to examine the local plan will carefully consider the representations made at the previous stage. People who have made representations at the previous stage will be notified of the examination process.</p> <p>The SCI indicates that press releases and e-newsletters may be used, however it cannot be guaranteed that it will be practical or appropriate through this stage. Listing the actions under 'may' is considered appropriate, allowing the council to consider when such actions will be beneficial.</p>
Finchampstead Parish Council	4.14	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 4.14 refer to the plan examination stage. At this stage the Inspector appointed to examine the local plan will carefully consider the representations made at the previous stage. People who have made representations at the previous stage will be notified of the examination process.</p> <p>The SCI indicates that press releases and e-newsletters may be used,</p>



Respondent	Section or paragraph	Summary of representation	Council response
			<p>however it cannot be guaranteed that it will be practical or appropriate through this stage. Listing the actions under 'may' is considered appropriate, allowing the council to consider when such actions will be beneficial.</p>
CO1	4.14	Amend actions listed as 'may' to 'will'.	<p>Paragraph 4.14 refer to the plan examination stage. At this stage the Inspector appointed to examine the local plan will carefully consider the representations made at the previous stage. People who have made representations at the previous stage will be notified of the examination process.</p> <p>The SCI indicates that press releases and e-newsletters may be used, however it cannot be guaranteed that it will be practical or appropriate through this stage. Listing the actions under 'may' is considered appropriate, allowing the council to consider when such actions will be beneficial.</p>
CO1	4.16	With regard to the Inspectors report of examination and actions that will be undertaken:	<p>The bullet referred to making paper copies of the examiner's report available at the council office. Paragraph 4.17 refers to considering</p>

Respondent	Section or paragraph	Summary of representation	Council response
		<ul style="list-style-type: none"> <li>Paper copies of the Inspectors report should be available at parish/town council offices.</li> </ul>	<p>making copies available at main libraries.</p> <p>The council would support parish/town councils printing and making information available to their communities.</p>
Finchampstead Parish Council	4.17	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 4.17 relates to the publication of the Inspector report into the examination of a local plan. Planning law requires direct communication with those who asked to be notified of the publication of the Inspectors report. Additional actions include making copies available at the council office and online and the issuing of a press release.</p> <p>Making copies available at libraries and the use of social media would be supplementary and as such it is reasonable to describe this as 'may'.</p>
CO1	4.17	<p>With regard to the Inspectors report of examination and actions that may be undertaken:</p> <ul style="list-style-type: none"> <li>Paper copies of the Inspectors report should be available at libraries.</li> </ul>	<p>Paragraph 4.17 relates to the publication of the Inspector report into the examination of a local plan. Planning law requires direct communication with those who asked to be notified of the publication of the Inspectors report.</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>Additional actions include making copies available at the council office and online and the issuing of a press release.</p> <p>Making copies available at libraries and the use of social media would be supplementary and as such it is reasonable to describe this as 'may'.</p>
CO1	4.19	<p>With regard to actions that will be taken on adoption:</p> <ul style="list-style-type: none"> <li>• Paper copies of documents should be available at libraries and town/parish council offices.</li> </ul>	<p>Paragraph 4.19 relates to the actions the council will take at the adopted local plan stage. This includes making the local plan and other statutory documents available at the council office and online.</p> <p>There is no requirement to make the documents available at town or parish council offices. The costs of orienting would be significant.</p>
Finchampstead Parish Council	4.20	<p>Remove as unnecessary. It is accepted that these documents are likely to be too big for a library read and that press release or e-newsletter is sufficient media coverage.</p>	<p>Paragraph 4.20 states that the council 'may' make copies of the adopted local plan available in libraries and use social media to inform people. These actions would be additional to those required by planning law and are reasonable action to consider.</p>

Respondent	Section or paragraph	Summary of representation	Council response
CO1	4.20	The actions listed as 'may' should be changed to 'will'.	Paragraph 4.20 states that the council 'may' make copies of the adopted local plan available in libraries and use social media to inform people. These actions would be additional to those required by planning law and are reasonable action to consider.

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Section 5: Engagement process for supplementary planning documents

Respondent	Section or paragraph	Summary of representation	Council response
Earley Parish Council	5.2	What status does the Design Guidance have as I is often ignored through statements that a proposed development broadly complies.	<p>Supplementary Planning Documents are a material consideration when determining planning applications. Such documents are used to provide more information on the application of policies set out in local plans.</p> <p>Advice contained within Supplementary Planning Documents is taken into account when considering planning applications as evidenced within the officer report.</p>
CO1	5.2	Where Supplementary Planning Documents and design guides fail is the planning department tends to ignore them as they are considered advisory. Where possible aspects should be incorporated into a local plan to ensure they carry weight.	<p>Supplementary Planning Documents are a material consideration when determining planning applications. Such documents are used to provide more information on the application of policies set out in local plans.</p> <p>Advice contained within Supplementary Planning Documents is taken into account when considering planning applications as evidenced within the officer report.</p> <p>It would be impractical to incorporate the level of detail included within a Supplementary</p>

Respondent	Section or paragraph	Summary of representation	Council response
			Planning Document within a local plan.
CO1	5.5	<p>With regard to actions that will be undertaken:</p> <ul style="list-style-type: none"> <li>• In identifying specific groups, greater exposure is needed.</li> <li>• In undertaking specific engagement, greater exposure if needed.</li> </ul>	<p>Comments noted.</p> <p>Earley engagement will be designed with regard to the scope of the particular SPD being proposed.</p>
CO1	5.6	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 5.6 relates to inviting views from the public on the preparation of SPD, prior to consultation on a draft document. Whilst it is recognised that this may be a suitable step in the preparation of SPD covering some topic areas or sites, it will not be appropriate in many cases. Listing the action as 'may' allows the consultation framework to be designed to suit the document being produced.</p>
Earley Town Council	5.7	Comments that the documents are often deeply technical and consultation should be for 6-weeks.	<p>Paragraph 5.7 refers to draft SPD being published for a minimum period of 4-weeks. This period corresponds with planning law.</p> <p>In practice, the council has often consultation on draft SPD for 6-weeks as suggested or for a longer</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>period. A longer period would be appropriate for more complex guidance, with a shorter period more simple guidance or minor updates.</p> <p>Retention of the minimum 4-week period is considered reasonable, allowing the consultation framework to be designed to the project.</p>
CO1	5.7	<p>With regard to consultation on a draft SPD and actions that will be taken:</p> <ul style="list-style-type: none"> <li>• Why not consult for 6-weeks for continuity?</li> <li>• Paper copies should also be made available in parish/town council offices and libraries.</li> </ul>	<p>Paragraph 5.7 refers to draft SPD being published for a minimum period of 4-weeks. This period corresponds with planning law.</p> <p>In practice, the council has often consultation on draft SPD for 6-weeks as suggested or for a longer period. A longer period would be appropriate for more complex guidance, with a shorter period more simple guidance or minor updates.</p> <p>Retention of the minimum 4-week period is considered reasonable, allowing the consultation framework to be designed to the project.</p>

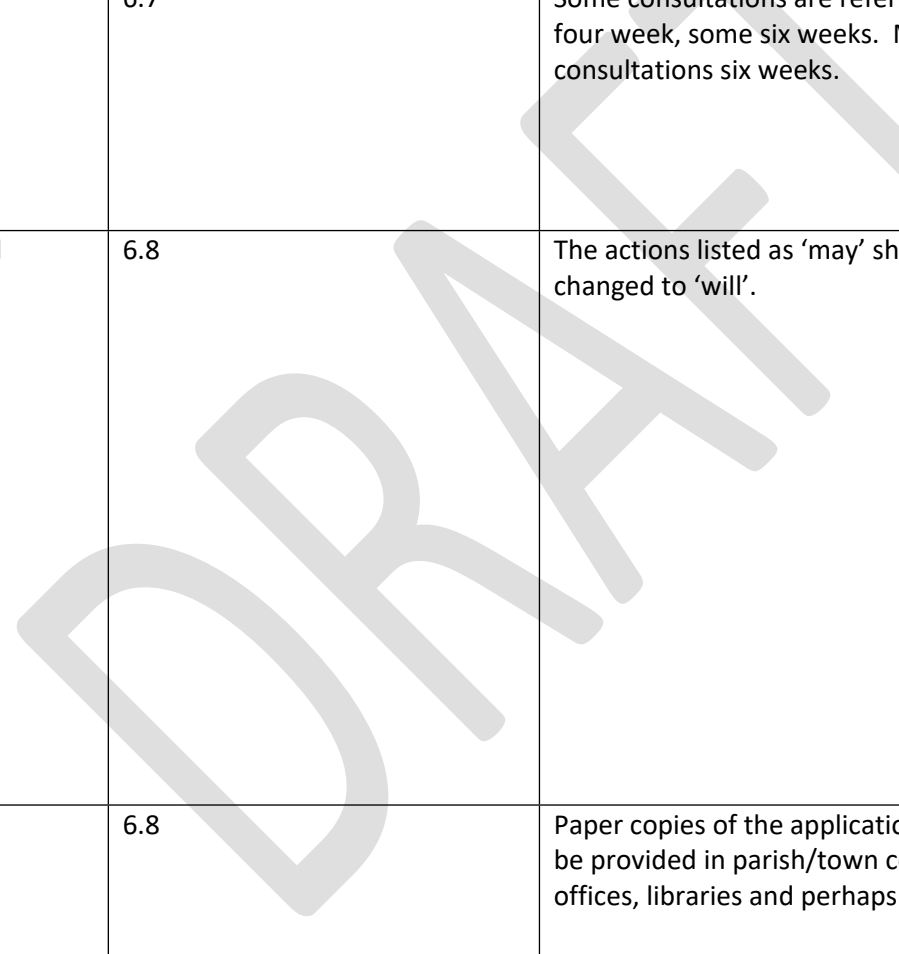
Respondent	Section or paragraph	Summary of representation	Council response
CO1	5.8	Holding exhibitions is good.	Comment noted.
CO1	5.9	Without being examined, an SPD carries less weight as it is really non-statutory guidance. It emphasises that all policies should be subject to examination.	<p>Supplementary Planning Documents are a material consideration when determining planning applications. Such documents are used to provide more information on the application of policies set out in local plans.</p> <p>SPD are a useful tool to help manage development proposals, however policies contained within a local plan for the starting point for determining planning applications.</p>
CO1	5.11	<p>With regard to the adoption of a SPD and actions that may be taken:</p> <ul style="list-style-type: none"> <li>• Paper copies must be made available in parish/town council offices and libraries.</li> </ul>	<p>The bullet refers to considering making paper copies of an SPD available at other council offices and appropriate libraries.</p> <p>The council would support parish/town councils printing and making information available to their communities.</p>



Section 6: Engagement process for neighbourhood development plans

<b>Respondent</b>	<b>Section or paragraph</b>	<b>Summary of representation</b>	<b>Council response</b>
Historic England	6	Welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans.	Comment noted.
Wokingham Society	6.1	Correct typo in the first line from 'gives' to 'give'.	Paragraph 6.1 amended as suggested.
CO1	6.1	Neighbourhood plans carry very little weight so are virtually useless in planning terms. Policies must comply with local plans.	As set out in paragraph 6.2 once a neighbourhood development plan is 'made' (adopted), it becomes part of the development plan alongside local plans and together form the starting point for deciding planning applications. It is incorrect to state that neighbourhood plans carry very little weight.
Wokingham Society	6.3	Insert a new sentence in the first line after 'plan', so start 'These stages are:'	Paragraph 6.3 amended as suggested.
Wokingham Society	6.4	Comments that the text 'Locality neighbourhood plan toolkit and guidance' is underlined, as if intended to provide hyperlink.	The reference to Locality neighbourhood plan toolkit and guidance is underlined due to it being a hyperlink. No changes are required.
Wokingham Society	6.5	Comments that it would be helpful to explain that the referenced costs of	Amendments made to paragraph 6.5 to expressly state that printing

Respondent	Section or paragraph	Summary of representation	Council response
		printing will need to be picked up by the neighbourhood group.	costs will fall to the group preparing the neighbourhood development plan.
Wokingham Society	6.5	Amend the penultimate bullet so that it begins 'Making...'	Paragraph 6.5 amended as suggested.
CO1	6.5	Advise applicants that neighbourhood plans carry very little weight unless it is 100% compliant with local plans.	<p>As set out in paragraph 6.2 once a neighbourhood development plan is 'made' (adopted), it becomes part of the development plan alongside local plans and together form the starting point for deciding planning applications. It is incorrect to state that neighbourhood plans carry very little weight.</p> <p>Whilst planning law requires a neighbourhood plan to be in general conformity with strategic policies set out in local plans, it does not stop neighbourhood plan policy adding value to the planning system, reflecting local priorities and values.</p>
CO1	6.5	Why costs for venues being available? What costs?	The use of the council facilities is outside the scope of the SCI. Reference to potential costs for using facilities is therefore appropriate.

<b>Respondent</b>	<b>Section or paragraph</b>	<b>Summary of representation</b>	<b>Council response</b>
Wokingham Society	6.7	Suggests in the final line of the first bullet inserting 'and' after '(excluding bank holidays)'. 	Paragraph 6.7 amended as suggested.
CO1	6.7	Some consultations are referenced as four week, some six weeks. Make all consultations six weeks.	Planning law sets out that an application to be designated as a neighbourhood area must be published for four weeks. It is appropriate for the SCI to reflect this period.
Finchampstead Parish Council	6.8	The actions listed as 'may' should be changed to 'will'.	Paragraph 6.8 relates to the designation of a neighbourhood area. Planning law requires consultations for neighbourhood area designation to be available online, with a paper copy available at the council office.  Additional actions the council may choose include the issuing of a press release, the use of social media, the placing of a paper copy in libraries. These actions would be supplementary and as such it is reasonable to describe this as 'may'.
CO1	6.8	Paper copies of the application should be provided in parish/town council offices, libraries and perhaps schools.	Paragraph 6.8 relates to the designation of a neighbourhood area. Planning law requires consultations for neighbourhood area designation to be available

Respondent	Section or paragraph	Summary of representation	Council response
			<p>online, with a paper copy available at the council office.</p> <p>Additional actions the council may choose include the issuing of a press release, the use of social media, the placing of a paper copy in libraries. These actions would be supplementary and as such it is reasonable to describe this as 'may'.</p> <p>The use of schools as deposit locations is considered inappropriate with this giving rise to potential safeguarding issues when children are present and additional costs to the school in ensure buildings are open and staffed.</p>
CO1	6.8	Important to discuss area boundaries with new ward boundaries.	<p>The choice to prepare a neighbourhood development plan sites with the town or parish council unless the area is unparished. It is for the town or parish council to decide the neighbourhood area they wish to apply for.</p> <p>Planning law requires the council to accept applications to designate areas which are commensurate with a parish council boundary. Where</p>

Respondent	Section or paragraph	Summary of representation	Council response
			applications differ, other factors can be considered.
CO1	6.8	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 6.8 relates to the designation of a neighbourhood area. Planning law requires consultations for neighbourhood area designation to be available online, with a paper copy available at the council office.</p> <p>Additional actions the council may choose include the issuing of a press release, the use of social media, the placing of a paper copy in libraries. These actions would be supplementary and as such it is reasonable to describe this as 'may'.</p> <p>The use of schools as deposit locations is considered inappropriate with this giving rise to potential safeguarding issues when children are present and additional costs to ensure buildings are open.</p>
CO1	6.9	<p>With regard to the pre-submission plan stage and actions listed as 'will':</p> <ul style="list-style-type: none"> <li>• The SEA should cover the impact of local plan development in the area.</li> </ul>	Strategic Environmental Assessment is a process which focuses on environmental impacts of plans, projects and programmes.

Respondent	Section or paragraph	Summary of representation	Council response
		<ul style="list-style-type: none"> <li>• Good that the council will support the town/parish council with undertaking the SEA.</li> </ul>	SEA will consider the impacts of the proposals contained within the neighbourhood development plan.
Finchampstead Parish Council	6.10	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 6.10 relates to initial draft consultations on a neighbourhood development plan. This stage of plan-making is led by the parish or town council with planning law placing no requirement on council. Notwithstanding, actions that the council 'may' choose are to publicise the plan on the council's website, issue a press release and provide a paper copy at the council office.</p> <p>These actions are considered reasonable to describe as 'may'.</p>
CO1	6.10	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 6.10 relates to initial draft consultations on a neighbourhood development plan. This stage of plan-making is led by the parish or town council with planning law placing no requirement on council. Notwithstanding, actions that the council 'may' choose are to publicise the plan on the council's</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>website, issue a press release and provide a paper copy at the council office.</p> <p>These actions are considered reasonable to describe as 'may'.</p>
CO1	6.10	<p>Paper copies should be provided at town/parish council offices and libraries.</p>	<p>Paragraph 6.10 relates to initial draft consultations on a neighbourhood development plan. This stage of plan-making is led by the parish or town council with planning law placing no requirement on council. Notwithstanding, actions that the council 'may' choose are to publicise the plan on the council's website, issue a press release and provide a paper copy at the council office.</p> <p>These actions are considered reasonable to describe as 'may'.</p>
CO1	6.11	<p>With regard to the publication version and actions listed as 'will':</p> <ul style="list-style-type: none"> <li>• Consultation should be for a minimum of six weeks and this should be the norm for all consultations.</li> <li>• Paper copies of the plan documents should be</li> </ul>	<p>As set out in paragraph 6.11, consultation on final draft local plan will be for a minimum period of six-weeks. This accords with planning law.</p> <p>A paper copy will be made available in the council offices in accordance with planning law.</p>

Respondent	Section or paragraph	Summary of representation	Council response
		available at town/parish councils and libraries.	There is no requirement to make copies available in town or parish council offices, however should they choose to do so, this would be welcomed.
Finchampstead Parish Council	6.12	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 6.12 relates to the publication of the submission neighbourhood development plan. Planning law requires the council to consult on the plan, making it available online and in the council office and to collate representations.</p> <p>Actions the council 'may' choose are listed as the issuing of a press release / e-newsletter, the use of social media and the summarising of representations.</p> <p>These actions would be supplementary and as such it is reasonable to describe this as 'may'.</p>
CO1	6.12	The actions listed as 'may' should be changed to 'will'.	Paragraph 6.12 relates to the publication of the submission neighbourhood development plan. Planning law requires the council to consult on the plan, making it available online and in the council



Respondent	Section or paragraph	Summary of representation	Council response
			<p>office and to collate representations.</p> <p>Actions the council 'may' choose are listed as the issuing of a press release / e-newsletter, the use of social media and the summarising of representations.</p> <p>These actions would be supplementary and as such it is reasonable to describe this as 'may'.</p>
Finchampstead Parish Council	6.14	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 6.14 relates to the examination of a neighbourhood development plan. Planning law requires a number of actions including passing representations to the appointed examiner, funding the examination, answering any questions directed to the council from the examiner and making the examiners report available online.</p> <p>Actions the council 'may' choose are listed as notifying consultees and providing a summary of representations.</p> <p>These actions would be supplementary and as such it is reasonable to describe this as 'may'.</p>

Respondent	Section or paragraph	Summary of representation	Council response
Finchampstead Parish Council	6.18	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 6.18 relates to the making (adoption) of a neighbourhood development plan. Planning law requires the council to publish the decision to make the plan on the website and notify people who asked to be notified.</p> <p>An action the council 'may' choose is listed as issuing a press release.</p> <p>This action would be supplementary and such it is reasonable to describe this as 'may'.</p>

Section 7: Engagement process for planning applications

Respondent	Section or paragraph	Summary of representation	Council response
Woodley Town Council	7.3	The document would benefit from providing links and / or directing readers to further information explaining 'Permitted Development' and 'Prior Approval'; i.e. what this cover and how it affects local processes like, for example, consultation.	New paragraph added after paragraph 7.4 providing a link to the Planning Portal website where further information can be found.
Woodley Town Council	7.4	The document would benefit from providing links and / or directing readers to further information explaining 'Permitted Development' and 'Prior Approval'; i.e. what this cover and how it affects local processes like, for example, consultation.	New paragraph added after paragraph 7.4 providing a link to the Planning Portal website where further information can be found.
CO1	7.5	In general, interpretation by the use of the words 'on balance' means in favour of the applicant.	<p>Paragraph 7.5 sets out that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.</p> <p>The structure of planning law therefore requires a decision to be made on balance. This balance may be in accordance with the development plan or towards an</p>

Respondent	Section or paragraph	Summary of representation	Council response
			exception to aspects of the development plan where material considerations provide justification.
Loddon Valley Ramblers	7.6	Insert impact on rights of way and access into the list of material considerations.	Paragraph 7.6 amended to insert reference to effect on public rights of way.
CO1	7.6	<p>With regard to material considerations:</p> <ul style="list-style-type: none"> <li>• Many considerations are simply ignored by the use of the words 'on balance'.</li> <li>• Comments 'not so' in relation to effects on listed buildings or conservation areas.</li> <li>• Comments hardly ever in relation to effects on trees and hedgerows, stating that houses come first.</li> <li>• Comments precedent in relation to previous planning decisions.</li> </ul>	<p>It is incorrect that material considerations are not taken into account.</p> <p>Relevant material considerations, including those raised in representations, are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
Wokingham Society	7.7	Amend the to add a full stop after 'consideration' and then a capital letter for 'However'.	Paragraph 7.7 amended as suggested.

Respondent	Section or paragraph	Summary of representation	Council response
CO1	7.7	Public interest generally is ignored as the development need seems to get priority.	<p>As set out in paragraph 7.5, planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.</p> <p>It is unclear what is meant by public interest, however, in the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
CO1	7.11	Comments needs more encouragement and incentives.	<p>Paragraph 7.11 refers to the council's discretionary pre-application service which enables someone considering developing land or buildings is able to gain advice before proceeding to submit an application for planning permission.</p> <p>As stated, the council encourage the use of this service.</p>
CO1	7.12	A very grey area, especially in rural areas.	Comment noted.

Respondent	Section or paragraph	Summary of representation	Council response
			<p>Paragraph 7.12 refers to actions someone proposing to make a planning application should take. As set out the council encourages positive engagement with local people.</p> <p>There are no mechanisms for the council to enforce actions which a person may choose to take.</p>
Wokingham Society	7.12	Insert hyperlink to the Localism Act.	Paragraph 7.12 amended to make Localism Act 2011 a hyperlink.
Finchampstead Parish Council	7.12	No information is provided on how the council will discharge a person's obligation to bring a planning applications attention to those in vicinity of the site.	<p>Paragraph 7.12 refers to actions someone proposing to make a planning application should take. As set out the council encourages positive engagement with local people.</p> <p>There are no mechanisms for the council to enforce actions which a person may choose to take.</p>
Wokingham Society	7.13	Comments that the text from the currently adopted SCI at para 6.7 which specifies the obligation of those promoting medium/large scale development to start community engagement at an early point and	Paragraph 7.12 amended to include text confirming that for larger proposals, engagement should start early and form an integral part of the initial design process.

Respondent	Section or paragraph	Summary of representation	Council response
		that it must form an integral part of the initial design process.	
Earley Town Council	7.13	Correct typos by changing 'method' to 'methods'.	Paragraph 7.13 amended as suggested.
Earley Town Council	7.13 / Table 1	The adopted SCI had a column for what the developer must do. For householder applications this included displaying a site notice and said 'should', not 'shall'. The council should more strong encourage the display of site notices for all applications.	<p>Table 1 relates to actions someone proposing a planning application (e.g. a developer) should take before an application is submitted to the council.</p> <p>Paragraph 7.19 refers to actions once a planning application has been submitted. This confirms that where required by law, the council will display a planning notice on or near the application site. Where not required, the council will send a notice to the applicant and ask them to place this on display voluntarily. This is for all scales of proposed development.</p>
CO1	7.14	Comments that it is very helpful to highlight that someone looking to submit a planning application should consider the comments raised through early engagement and amend the proposal if necessary.	Comment noted.

Respondent	Section or paragraph	Summary of representation	Council response
Shinfield Parish Council	7.16	Paragraph 7.16 should be strengthened and incorporated with 7.15 as a “We Will Liaise with town and parish councils”.	<p>Paragraphs 7.15 and 7.16 relate to actions the council will and may take when they are aware that someone may be proposing a planning application in the future.</p> <p>The actions state we will encourage the potential applicant to consult with the community, and the council may liaise with the town or parish council.</p> <p>Within a pre-application context, the council may not be able to share information received due to confidentiality issues. It is appropriate that liaison is listed as an action that may be undertaken where relevant.</p> <p>Notwithstanding, it is accepted that the reference to encouraging consultation with the community could expressly refer to town and parish councils and has been amended accordingly.</p>
Earley Town Council	7.16	It should be made clear that town and parish councils are a consultee in statute.	Whilst town and parish councils are a statutory consultee for planning applications, paragraph 7.16 refers to actions that may be taken before



Respondent	Section or paragraph	Summary of representation	Council response
			<p>an application is submitted to the council.</p> <p>Paragraph 7.15 states that the council will encourage applicants to consult the community. This would include the town or parish council, however the paragraph has been amended to expressly state this.</p> <p>Paragraph 7.16 states that the council may liaise with town and parish councils where relevant. Within a pre-application context, the council may not be able to share information received due to confidentiality issues. It is appropriate that liaison is listed as an action that may be undertaken and where relevant.</p>
Finchampstead Parish Council	7.16	The actions listed as 'may' should be changed to 'will'.	<p>Paragraph 7.16 relates to actions a person proposing a planning application should take before submission. The specific reference is to the council liaison with Town and Parish Councils where relevant.</p> <p>With the requirement within the section falling to the person preparing a planning application, it is not reasonable to place a</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>requirement on the council who may not be aware of the persons intention. Further, within a pre-application context, the council may not be able to share information received due to confidentiality issues. It is appropriate that liaison is lists as an action that may be undertaken and where relevant.</p>
CO1	7.16	Comments that liaise with town/parish council is a must.	<p>Whilst town and parish councils are a statutory consultee for planning applications, paragraph 7.16 refers to actions that may be taken before an application is submitted to the council.</p> <p>Paragraph 7.15 states that the council will encourage applicants to consult the community. This would include the town or parish council, however the paragraph has been amended to expressly state this.</p> <p>Paragraph 7.16 states that the council may liaise with town and parish councils where relevant. Within a pre-application context, the council may not be able to share information received due to confidentiality issues. It is appropriate that liaison is lists as an</p>

Respondent	Section or paragraph	Summary of representation	Council response
			action that may be undertaken and where relevant.
Wokingham Society	7.17	Correct grammar by removing the redundant 'by' in front of 'via' in the second line.	Paragraph 7.17 amended as suggested.
Surrey County Council	7.18	Public Service Infrastructure (PSI) applications are only allowed 18 day consultations.	Paragraph 7.18 amended to refer to most types of planning application requiring 21 days consultation.
Arborfield and Newland Parish Council	7.19	Support the extending the consultation period for major applications from 21 to 28 days.	Supported noted.
Winnersh Parish Council	7.19	Support the extending the consultation period for major applications from 21 to 28 days.	Support noted.
Earley Town Council	7.19	Comments that planning law has requires notification of neighbours that adjoin the site and are opposite. The adopted SCI refers to consulting properties on opposite the site where separated by road, footpath of similar feature.	<p>Paragraph 7.19 refers to posting letters to neighbours adjoining the application site.</p> <p>The SCI being quoted by the respondent is that adoption in 2014, which was superseded by a the currently adopted SCI in 2019.</p> <p>Planning law requires notification of a planning application to be sent to adjoining properties. The council's interpretation is that this excludes</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>properties separated by features such as roads.</p> <p>Notwithstanding, the council consults a wider number of properties beyond those adjoining the application site where it is considered reasonable based on the scale and nature of the proposal. Paragraph 7.20 has been amended to refer to this under 'may'.</p>
Earley Town Council	7.19	Town and parish councils should be notified of applications in adjoining areas.	<p>Planning law requires notification of a planning application to be sent to the town or parish council in which the application is situated.</p> <p>Notwithstanding, the council will consult wider town and parish councils where it is considered reasonable based on the scale and nature of the proposal. Paragraph 7.20 has been amended to refer to this under 'may'.</p>
ID9	7.19	Notification of people affected by planning development should be strengthened with only those adjoining the application site notified at present. Even really minor applications have an impact beyond immediate neighbours.	<p>Paragraph 7.19 refers to posting letters to neighbours adjoining the application site.</p> <p>The SCI being quoted by the respondent is that adoption in 2014,</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>which was superseded by a the currently adopted SCI in 2019.</p> <p>Planning law requires notification of a planning application to be sent to adjoining properties. The council's interpretation is that this excludes properties separated by features such as roads.</p> <p>Notwithstanding, the council consults a wider number of properties beyond those adjoining the application site where it is considered reasonable based on the scale and nature of the proposal. Paragraph 7.20 has been amended to refer to this under 'may'.</p>
ID8	7.19	<p>Comment that where development is proposed with a wider ownership, e.g. development within a wider caravan park owned by the applicant, that consultation should extend beyond that of the freehold ownership</p>	<p>Planning law requires notification of a planning application to be sent to adjoining properties. The council's interpretation is that this excludes properties separated by features such as roads.</p> <p>Notwithstanding, the council consults a wider number of properties beyond those adjoining the application site where it is considered reasonable based on the scale and nature of the proposal.</p>

Respondent	Section or paragraph	Summary of representation	Council response
			Paragraph 7.20 has been amended to refer to this under 'may'.
Historic England	7.20	Suggests either referring to statutory consultees or adding Historic England to the list of agencies mentioned.	<p>Paragraph 7.20 provides give sthe example of the Environment Agency and Natural England when referring to other organisations that may be consulted.</p> <p>There is not necessary to provide an exhaustive list, however Historic England has been added.</p>
Finchampstead Parish Council	7.20	Amend listed actions from 'may' to 'will where applicable'.	As set out in paragraph 1.7, those actions which go beyond lawful requirements are often set out as things the council 'may' do. Many of these actions are taken, however there will be occasions when it will not be practicable or appropriate to do all of them.
CO1	7.20	With regard to the statement that the council may consult with other organisations, that this is not always.	As set out in paragraph 7.20 other organisations are consulted where applicable. This will not be the case in all circumstances.
Surrey County Council	7.21	Does the publication of responses take account of PAS advice that this is not a requirement and that full redaction and consideration needs to be done before publication.	As set out in paragraph 2.5, the council will protect residents by redacting sensitive information before it is made public, such as personal addresses, phone

Respondent	Section or paragraph	Summary of representation	Council response
		<p>Suggest setting expectation on retention of published comments, e.g. removal after a number of years.</p>	<p>numbers, email addresses, and dates of birth.</p> <p>Document retention is beyond the scope of the SCI.</p>
Wokingham Society	7.21	<p>Comments that reference to registering to have an opportunity to speak at planning committee is misleading with registration not guaranteeing the right to speak.</p> <p>The rules for this are set out in the council's guidance on 'Who Can Speak', which specifies that "objectors or supporters ... must live within the ward(s) of the relevant application under consideration or be directly affected by the proposed development – or have been asked to speak by someone who meets either of these criteria".</p> <p>An organisation such as the Wokingham Society, with a general concern for development across the whole town of Wokingham must (by chance rather than design) either have a suitable spokesperson who lives in the relevant ward(s) or be invited to speak by a non-member who does.</p>	<p>The government requires planning applications to be determined within a timely fashion and there are usually several planning applications to be considered at the meeting. To ensure timely decision making the time available for public speaking needs to be limited.</p> <p>There is a total of 9 minutes public speaking time at a Planning Committee meeting divided between various parties.</p> <p>Paragraph 7.21 refers to providing an opportunity to speak at Planning Committee. It is accepted that whilst opportunity exists, where multiple people wish to speak, the time permitted would not allow for everyone to speak and that interested people are requested to coordinate their input through nominating a spokes person.</p>

Respondent	Section or paragraph	Summary of representation	Council response
		<p>While we would hope that the Wokingham Society might be regarded under para. 4.4 as a 'civic amenity group' if this carries entitlement to register to speak, we would at least urge that this bullet point be amended by adding after "register to speak at Planning Committee" "(but see the Council's guidance on "Who Can Speak" under the rules for a Planning Committee meeting)", and provide digital link.</p>	<p>A footnote has been added to the bullet referencing the council's website on how an interested person can find out more.</p>
CO1	7.21	<p>Comments that three minutes is insufficient for someone to speak at Planning Committee.</p>	<p>There is no limit to the volume of written representations that can be made in connection with a planning application.</p> <p>The Government requires planning applications to be determined within a timely fashion and there are usually several planning applications to be considered at the meeting. To ensure timely decision making the time available for public speaking needs to be limited.</p> <p>There is a total of 9 minutes public speaking time at a Planning Committee meeting divided between various parties.</p>



Respondent	Section or paragraph	Summary of representation	Council response
CO1	7.23	Comments from local people are generally just ignored.	<p>It is incorrect that matters raised in representations, are ignored. All representations are carefully considered alongside the views of others, technical information and planning law, policy and guidance.</p> <p>In the case of planning applications, the views of people who have made representations are summarised within the officer report, with the matters raised visibly considered and responded to.</p>
Earley Town Council	7.25	It should be made clear that Planning Committee must consider an Officer's recommendations and of the financial implications of an appeal arising is not a consideration the Committee must account for.	The council has limited resources. All councillors have a fiduciary duty to ensure that public resources are not wasted. Whilst the cost of an appeal is not a material planning consideration, the failure to adequately substantiate reasons for refusal would constitute unreasonable behaviour and expose the council to an award of costs against it.
Woodley Town Council	7.25	The document would benefit from a greater explanation of the 'listing' process; i.e. which applications are considered by Officers, and which can be listed and how.	This is set out in the council's Constitution which is available on the website.

Respondent	Section or paragraph	Summary of representation	Council response
CO1	7.26	Comments that three minutes is insufficient for someone to speak at Planning Committee, denying the ability to make a substantive case against the officer report.	<p>There is no limit to the volume of written representations that can be made in connection with a planning application.</p> <p>The Government requires planning applications to be determined within a timely fashion and there are usually several planning applications to be considered at the meeting. To ensure timely decision making the time available for public speaking needs to be limited.</p> <p>There is a total of 9 minutes public speaking time at a Planning Committee meeting divided between various parties.</p>
CO1	7.27	Notification of the decisions should be sent to all those who have commented on the planning application.	Notification is sent to all those that commented on an application.
Wokingham Society	7.28	Amend the second line after "In these" to add "cases".	Paragraph 7.28 amended as suggested.
CO1	7.28	Officers in the past have based planning decisions on cost which is not a planning matter.	Paragraph 7.28 explains that an applicant may appeal the decision

Respondent	Section or paragraph	Summary of representation	Council response
			of the council to refuse planning permission.

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Section 8: Dealing with unauthorised development

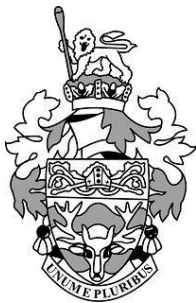
Respondent	Section or paragraph	Summary of representation	Council response
Earley Town Council	8	It would be useful to provide an explanation of the presumption in favour of sustainable development, the process of allowing a retrospective planning application, and the process by which the expedience of enforcement is considered.	<p>The presumption in favour of sustainable development is set out in the National Planning Policy Framework.</p> <p>Retrospective applications are allowed by legislation. An explanation of enforcement principles and procedures is provided within Local Planning Enforcement Plan which is references and linked to from this section.</p> <p>Enforcement policy falls outside the scope of the SCI, which relates to engagement throughout the land use planning process.</p>
CO1	8	The council has failed in this area. The council has excellent officers but there is a policy of how to appease the unauthorised developer by getting them to submit a planning application and recommending it is approved. Developers consider the council to be a soft touch and they can get away with whatever they want.	<p>The council operates an effective enforcement team which investigates an average of 1000 alleged breaches of planning each year and serves more enforcement notices than any of the other Berkshire Authorities.</p> <p>The council’s approach to planning enforcement is in line with the national Planning practice Guidance</p>

Respondent	Section or paragraph	Summary of representation	Council response
			<p>and is set out within the Local Planning Enforcement Plan.</p> <p>Where works have been carried out without permission, a person has the right under planning law to submit a retrospective application for those works.</p>
Woodley Town Council	8.2	Insert hyperlink to the Local Planning and Enforcement Plan.	Paragraph 8.2 amended to make Local Planning and Enforcement Plan a hyperlink.
Wokingham Society	8.3	Insert hyperlink to the GOV.UK website.	Paragraph 8.3 amended to make National Planning Policy Framework a hyperlink.
Wokingham Society	8.4	Comments that there should be a method of reporting a breach of planning by phone or in writing. Details should be added.	Paragraph 8.4 amended to reflect that the council website is the best way to report a suspected breach of planning, but someone way also write to the council or call the customer line.
Wokingham Society	8.5	Insert hyperlink to the Local Planning and Enforcement Plan.	Paragraph 8.5 amended to make Local Planning and Enforcement Plan a hyperlink.

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# Statement of Community Involvement

March 2024



**WOKINGHAM**  
**BOROUGH COUNCIL**

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## 1. [Introduction](#)

### [What is a Statement of Community Involvement?](#)

- 1.1 The Statement of Community Involvement (SCI) sets out how we ensure effective community involvement at all stages in the land use planning process. It explains how you can be involved in the preparation of local plans, neighbourhood development plans, supplementary plans, and the consideration of planning applications. It also sets out what is expected from those proposing developments.

### [Why is the Statement of Community Involvement relevant?](#)

- 1.2 We recognise that land use planning can affect everyone's daily lives, as the decisions we make shape the place we live and work in, visit or pass through. As a result, we want to involve communities at all stages of the planning process.
- 1.3 There are many benefits of involving communities in planning matters, these include:
- A greater focus on local needs and priorities.
  - Decisions being informed by local knowledge.
  - Increased community understanding of how planning policies are developed and how they are linked to other council documents.
  - Increased community understanding of how decisions on planning applications are made.
  - Creating a sense of ownership of key planning policy documents.
  - Removing barriers (physical, language or social) and gives communities access to information and opportunities to voice their needs and opinions.
  - Creating accountability by generating a wider interest in monitoring outcomes.
- 1.4 We want everyone to feel empowered to get involved with the planning process should they wish.
- 1.5 We aim to make consultation and involvement in the planning process transparent, accessible, collaborative, inclusive and consistent. We will do this through the methods set out in this SCI.
- 1.6 In the sections that follow, we set out what the law says we must do. Any other options we may choose to do are described as 'may'. We will use these other options where practicable or appropriate.

## 2. [Principles of Community Involvement](#)

- 2.1 The land use planning process is more effective when the people that might be affected by change are an integral part of the engagement process. Greater involvement can help shape planning solutions that maximise the positive outcomes and minimise any negatives.
- 2.2 We will not pretend that planning decisions are free of difficult choices. Decisions need to be made within legal requirements, have regard to national planning policy and guidance, and consider technical evidence. In most cases, the planning judgement and decision will balance both positive and negative effects. There will also be differences of opinion. However, through positive engagement we hope interested parties become engaged in our work so that the quality of decisions is improved by taking account of local knowledge and opinion, and that the outcomes are understood.

### [Our principles for involving communities](#)

- 2.3 As a minimum, we will comply with any legislation that is currently in force or comes into force in the future. This includes any national legislation in an emergency, such as the coronavirus pandemic.
- 2.4 We will tailor our approach where needed for specific issues, audiences and the scale of proposals, so that it is fit for purpose for the subject being consulted on, making it easier for people to take part. For example, where proposals have a local or limited impact, then we will seek to more closely involve those most affected. When we are planning for a large area, or considering choices which might affect much of the borough, then we will engage widely.
- 2.5 Our main principles of involving the various communities in the planning process are set out below:
- Encouraging our communities to contribute by providing opportunities to put their ideas forward where there is scope to influence our decisions.
  - We will be transparent and clear about the planning process, what is being proposed and the scope to influence.
  - We will use a variety of methods to make it easier for people to take part in the planning process, with the method used being appropriate to the subject being consulted upon.
  - We will design engagement exercises to be accessible.
  - We will encourage better inclusion of everyone affected by a planning matter, making the effort to include “disengaged” groups such as young people, ethnic minorities, disabled people, and the travelling community.
  - We will make information available that is appropriate and understandable, raise awareness of planning matters and ensure people are kept up to date. All data stored and published will be compliant with our data protection policy.
  - We will analyse carefully and, where appropriate, provide clear feedback for participants after an engagement exercise. This may include changes we have made as a result of comments.
  - We will protect residents by redacting sensitive information before it is made public, such as personal addresses, phone numbers, email addresses, and dates of birth.
  - We will encourage appropriate representations (comments), by only accepting comments that are relevant to the subject being consulted on. No profanities, or statements considered derogatory or offensive to persons sharing a protected characteristic (such as disability, race, religion and others) will be accepted. If your representation is rejected for such reasons, you will be notified of the reason for this once it has been processed.

### Engagement by landowners and developers

- 2.6 We look for our commitment to engagement to be matched by landowners and developers who are considering bringing forward proposals.
- 2.7 Landowners and developers should engage early so that the views of residents and other stakeholders can be taken into account when deciding whether to proceed with a proposal, and if that is the decision, in the detail of the proposal itself. The purpose of the engagement should be made clear and highlight that this is prior to any planning application being submitted to the council.

### Digital and online technology

- 2.8 Greater use of digital-technology is likely to continue to play an important role in the planning process in the future. Online events can allow us to provide information easier and in a way which can be less intimidating, as people do not have to travel or make their voice heard in a crowd. It can also lead to greater engagement from young people who typically don't get involved with planning matters.
- 2.9 We recognise there are potential disadvantages with relying entirely on digital-technology. These include excluding those who do not have access to it, and that it relies on people visiting websites and clicking links, which they will do only if they already have an interest. As technology advances, the council will consider opportunities for those who interact with the council's website and/or comment on planning applications to opt-in to receive notifications on matters which are of importance to them. This could include being notified of new planning applications close to them.

### Equalities

- 2.10 As required by law, the SCI has been drafted to have regard to the need to eliminate unlawful discrimination, harassment and victimisation and to advance equality of opportunity and foster good relations between different groups.

### 3. [Planning for the future of Wokingham Borough](#)

3.1 In this section we give more detail about the main types of policy plans and documents we produce.

#### [Documents we produce](#)

##### a) Statement of Community Involvement (SCI)

3.2 The preparation of a SCI is itself subject to consultation. Consultation requirements set out in an SCI will need to be followed when preparing policy documents and when consulting on planning applications.

##### b) Local Development Scheme

3.3 The Local Development Scheme (LDS) sets out our work programme for preparing the local plans we aim to prepare over the next three years or so. Local plans form part of the 'development plan' for the borough which is the starting point for determining planning applications.

3.4 The LDS explains:

- What local plans we will work on.
- What will be in the plans and where they will apply.
- How long it will take us to prepare the plans.
- What kind of plans they are.

3.5 An LDS does not include details of other plans and policy documents such as neighbourhood development plans, supplementary planning documents and other guidance documents, or the Community Infrastructure Levy charging schedule.

##### c) Local Plans

3.6 Local plans describe the places where development is intended, and where it needs to be carefully controlled. Policies within local plans should set out how development is to be managed over a minimum period of 15 years from adoption.

3.7 Local plans must include both 'strategic policies' to address the development and land use priorities, and non-strategic policies which will include things like sustainable design and construction. Local plans will allocate land to help deliver strategic requirements, including land for housing and employment.

3.8 Local plans are a key consideration when determining planning applications with decisions expected to be in accordance with local plans, and made (i.e. adopted) neighbourhood development plans, unless other material planning considerations indicate otherwise. Other material planning considerations are matters that should be considered in making a planning decision.

##### d) Sustainability Appraisal

3.9 A sustainability appraisal is a process through which the effects of a local plan on economic, social and environmental objectives are considered. A sustainability appraisal also incorporates a further

assessment process known as 'Strategic Environmental Assessment' which focuses on environmental impacts. Sustainability appraisals are iterative (i.e. subject to change and improvement over time), with the appraisal updated alongside each consultation stage of a local plan.

#### e) Supplementary Planning Documents

- 3.10 Supplementary Planning Documents (SPDs) set out more detailed guidance to further explain the policies and proposals in local plans. SPDs cannot change policies contained within local plans but can give detail on how those policies are implemented. SPDs are a material consideration when assessing a planning application.

#### f) Non-statutory guidance

- 3.11 The council may prepare other development briefs and guidance which are not formal SPDs, and we may also carry out consultation on these documents. Like SPDs, non-statutory guidance cannot change policies contained within local plans but can give detail on how those policies are implemented. Such documents and policies are also a material consideration when assessing a planning application.

#### g) Community Infrastructure Levy

- 3.12 The Community Infrastructure Levy (CIL) is a charge per square metre which can be levied by local authorities on new development to help deliver the infrastructure needed to support growth. CIL only applies in areas where a local authority has consulted on, and adopted, a charging schedule which sets out its levy rates. We adopted the current CIL charging schedule in 2015. These rates continue to apply, adjusted for inflation.

## 4. [Engagement process for local plans](#)

4.1 In this section we give more detail about how we will engage in the preparation of local plans.

4.2 Local plans are prepared in accordance with a regulatory process. The process includes consultation with the community and stakeholders. Following its preparation, a local plan is subject to examination by an independent Planning Inspector.

4.3 The process of preparing a local plan involves five broad stages:

1. Plan preparation.
2. Proposed Submission Plan publication and submission for examination.
3. Plan examination.
4. Publication of recommendations – Inspector’s report stage.
5. Plan adoption.

4.4 Once a local plan is adopted, it becomes part of the development plan alongside other local plans and made (i.e. adopted) neighbourhood development plans. Together these are the starting point for deciding planning applications.

### [How we will involve people in the preparation of local plans](#)

4.5 We are required by law to engage on the preparation of a local plan. This includes engaging with a range of specific consultees some of which are listed below.

- National statutory bodies and agencies (e.g., Environment Agency, National Highways, Natural England, Historic England, etc.).
- Other local authorities (as appropriate).
- Parish and town councils.
- Service providers of all kinds, including the emergency services, utility companies and health providers.
- National organisations such as The National Trust.
- Local organisations and societies such as civic or amenity groups.
- Businesses and economic groups including the Local Enterprise Partnerships.
- Environmental stakeholders, e.g., wildlife trusts.
- Groups who are less likely to be heard (disengaged groups), and groups with a specific role in equalities.
- Individuals (who have asked to be notified).
- House builders / agents / landowners / housing associations.
- Schools and youth groups.

### [Plan preparation](#)

4.6 The plan preparation stage typically includes evidence gathering on key issues, the development of options and a sequence of engagement exercises. Engagement may include both informal methods as well as formal methods such as consulting on a draft local plan.

- 4.7 We will:
- Write to consultees to say we intend to produce a local plan and invite them to say what issues they think the plan should cover.
  - Advertise our intention to produce a local plan, including a notification on our website, so that the public and organisations may register their interest.
  - Engage with statutory consultees on evidence base and the consideration of potential policy direction.
  - Consult on draft policies. We may do this in stages, for example by consulting on strategic policies and potential site allocations separately from non-strategic development management policies.
  - Hold engagement events to support consultations in person and/or online.
  - Engage with town and parish councils and other stakeholders, for example, through meetings, workshops and forums.
  - Issue information through press releases, e-newsletters, and social media.

- 4.8 We may:
- Prepare summaries of technical reports.
  - Create online surveys.
  - Produce further publicity such as posters, leaflets or postcards.

4.9 After consultations we will consider the representations received and set out the main issues raised in a report of the consultation.

#### [Proposed Submission Plan publication and submission for examination](#)

4.10 At this stage, we will publish the Proposed Submission Plan and invite representations on its legal compliance and soundness as defined in the [National Planning Policy Framework](#). We will pass all representations to the Planning Inspectorate who will arrange for their consideration by an Inspector through an examination process.

- 4.11 We will:
- Publish notification on our website of the Proposed Submission Plan (the version that we consider ready for examination) is being consulted on and invite comments for a minimum of six weeks (excluding bank holidays).
  - Get in touch directly with consultees to let them know of the publication of the Proposed Submission Plan.
  - Clearly set out how people and organisations can make valid representations (comments).
  - Prepare a consultation statement which sets out how we have taken account of comments received during the plan preparation stage in preparing the Proposed Submission Plan.
  - Make all statutory publication documents available, including the consultation statement available for inspection electronically or in paper form or both at the council's office.
  - Issue a press release to inform people that the consultation is taking place.
  - Use our e-newsletters and social media to inform people that the consultation is taking place.

- 4.12 We may:
- Make paper copies of the Proposed Submission Plan available at main libraries.
  - Produce further publicity such as posters, leaflets or postcards.



- Publish a press notice in a local newspaper.
- Undertake briefings with town and parish councils and other stakeholders either online or in person.

### Plan examination stage

4.13 The examination stage is run by the appointed Inspector, supported by an independent Programme Officer. The Inspector will consider all representations and evidence and then identifies areas to be investigated further. The Inspector will set specific questions and a programme to do this, typically involving hearing sessions.

4.14 We will:

- Get in touch directly with all those who made representations at the Proposed Submission Plan publication stage to give details of the date, time and place of the hearings, and the name of the person appointed to hold the examination.
- At least six weeks before the first hearing, give details on our website and at the council office of the date, time and place of the hearings and the name of the person appointed to hold the examination.
- Make examination documents available on our website.

4.15 We may:

- Use press release and our e-newsletter to inform people.
- Use digital platforms to allow online viewing of hearing sessions.

### Publication of recommendations – Inspector’s report stage

4.16 Based on their examination, the appointed Inspector will form a view on whether the local plan is legally compliant and is sound. Where necessary to make the local plan sound, the Inspector will recommend amendments to proposed policies and supporting text. This will be recorded through a formal report.

4.17 We will:

- Make the Inspector’s report available for inspection at the council office and on our website.
- Notify all those who requested to be informed of the Inspector’s report.
- Issue a press release and e-newsletter to inform people.

4.18 We may:

- Make paper copies of the Inspector’s report available at main libraries.
- Use social media to inform people.

### Plan adoption stage

4.19 Adoption is when the council confirms that the local plan has statutory status and full weight can be given to it in the determination of planning applications and appeals.

4.20 We will:

- Make available the local plan, adoption statement, the sustainability appraisal and habitat regulation assessment reports at the council office and on our website.
- Send a copy of the adoption statement directly to those who asked to be notified.

- Issue a press release and e-newsletter to inform people.

4.21 We may:

- Make paper copies of the local plan available at main libraries.
- Use social media to inform people.

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## 5. [Engagement process for supplementary planning documents](#)

5.1 In this section we give more detail about how we will engage in the preparation of Supplementary Planning Documents (SPD).

5.2 There are three types of SPD that might be prepared:

1. Site or area specific guidance (e.g. development briefs).
2. Design guidance.
3. Topic based policy guidance (e.g. affordable housing).

5.3 The process of preparing SPDs is simpler than that of local plans because they are not subject to examination. The process involves three broad stages:

1. Early engagement and preparation of a draft SPD.
2. Consultation on the draft SPD.
3. Adoption.

5.4 As with local plans, the law governs how SPDs are prepared, including minimum requirements for engagement.

### [Early engagement and preparation of a draft SPD](#)

5.5 We will:

- Identify specific groups and individuals who are likely to have an interest in what the SPD will say.
- Undertake a targeted engagement process with those groups and individuals to explore issues and options.
- Produce a draft statement of consultation setting out who we have engaged with in preparing the draft SPD, the issues raised and how we have addressed those issues.

5.6 We may:

- Invite views from the public through surveys or by notifications on our website inviting comments or through social media channels.

### [Consultation on the draft of the SPD](#)

5.7 We will:

- Publish the draft SPD for consultation on our website for a minimum of four weeks (excluding bank holidays), together with the required supporting documentation and make paper copies available to view at the council offices.
- Issue a press release and e-newsletter telling people about the consultation.

5.8 We may:

- Make paper copies of the draft consultation SPD and supporting documentation available at main libraries, as appropriate.
- Produce further publicity such as posters, leaflets or postcards.
- Hold exhibitions, workshops or forums, face-to-face or online.
- Use social media to inform people that the consultation is taking place.

- 5.9 After the consultation we will:
- Consider the representations received.
  - Update the statement of consultation document, setting out the main issues raised and how we have addressed those.
  - Amend the SPD, where we consider that it is appropriate to do so, to reflect the point raised in the representation.

#### SPD adoption

- 5.10 We will:
- Publish the adopted SPD, the amended consultation statement and adoption statement by making them available to view at the council offices, and on our website.
  - Send a copy of the adoption statement directly to those who asked to be notified.
- 5.11 We may:
- Make paper copies of the adopted document available at other council offices and appropriate libraries.
  - Issue a press release and e-newsletter to inform people.
  - Use social media to inform people.

#### Non-statutory guidance

- 5.12 Engagement relating to the preparation of non-statutory guidance will follow that set out for SPDs as set out above, where appropriate.

## 6. [Engagement process for neighbourhood development plans](#)

6.1 Neighbourhood development plans (also known as neighbourhood plans) give communities the ability to further shape their local area by setting out planning policies to help guide decisions on planning applications. Neighbourhood plans must be in general conformity with the strategic policies within local plans and cannot promote less development.

6.2 Once a neighbourhood development plan is 'made' (adopted), it becomes part of the development plan alongside local plans and other made neighbourhood development plans, which together are the starting point for deciding planning applications.

### [If you want to make a neighbourhood development plan](#)

6.3 There are formal stages required by law when developing a neighbourhood development plan. These stages are:

1. Designating the neighbourhood area.
2. First draft of the neighbourhood plan (Pre-Submission version).
3. Final draft of the neighbourhood plan (Submission version).
4. Examination.
5. Referendum.
6. Making (adoption).

6.4 More information on how to prepare a neighbourhood development plan can be found in the [Locality neighbourhood Plan toolkit and guidance](#).

### [Our legal duties to groups making a neighbourhood development plan](#)

6.5 We are required by law to offer help and advice to groups producing neighbourhood development plans. This includes:

- Advice on what is involved in making a neighbourhood development plan and potential scope, and share learning and best practice.
- Advice to support policy development, including the sharing of data and technical reports, creating maps (costs of printing will not be covered by the council and will need to be paid for by the group preparing the neighbourhood development plan), and attending appropriate meetings.
- Advice on methods of public consultation and engagement.
- Advice on how to publicise the proposed plan to the community, how to consult and publicise.
- Making venues available for public engagement (costs may apply).
- Advice on the availability of grant funding for neighbourhood planning groups.

6.6 This is in addition to our commitments during the individual plan stages.

### [Designating the neighbourhood area](#)

6.7 We will:

- Where an application for area designation differs from the parish or town council boundary, consult on the application for neighbourhood area designation for a minimum of 6 weeks (excluding bank holidays) and publicise the application on our website.

- Provide a paper copy of the application at the council's office for inspection.

6.8 We may:

- Issue a press release and e-newsletter to inform people that the consultation is taking place.
- Use social media to inform people that the consultation is taking place.
- Provide a paper copy of the application at main library nearest to the proposed neighbourhood area.
- In discussion with the neighbourhood body, amend the boundary of the neighbourhood area if it is inappropriate (for example, if it includes parts of other parishes that have not consented to their inclusion).

#### Initial draft(s) of the neighbourhood development plan (Pre-submission version)

6.9 We will:

- Support the preparation of a Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment screening reports of the emerging neighbourhood development plan.
- Assist the parish or town council with undertaking a SEA and Habitat Regulations Reports where found necessary.
- Advise on the consultation process and who to consult.
- Comment on the draft neighbourhood development plan.

6.10 We may:

- Publicise the consultation on our website.
- Issue a press release and e-newsletter to inform people that the consultation is taking place.
- Provide a paper copy of the Pre-Submission Plan at the council office for inspection.

#### Final draft of the neighbourhood development plan (Publication version)

6.11 We will:

- Consult on the Publication version (the Submission Plan) for a minimum of 6 weeks (excluding bank holidays).
- Publish the plan on our website.
- Provide a hard copy of the plan and supporting documents at the council office for inspection.
- Collate all responses and prepare them for submission to the examiner.

6.12 We may:

- Issue a press release and e-newsletter to inform people that the consultation is taking place.
- Use social media to inform people that the consultation is taking place.
- Summarise the comments received for the examiner.

#### Examination

6.13 We will:

- Liaise with the neighbourhood planning group to appoint an examiner.
- Publish details of the examination on our website.

- Pass any representations made at the Publication stage to the examiner.
- Manage and fund the process of the examination.
- Act as a key contact for the examiner.
- Answer any questions raised by the examiner.
- Publicise the examiner's report on our website.

6.14 We may:

- Notify consultees.
- Provide the examiner with a summary of the main issues raised in the representations.

6.15 There may be instances where we disagree with the appointed examiner's findings. If this is the case, clear reasons would need to be given for rejecting the examiner's recommendations, and we would discuss any modifications with the neighbourhood planning body. Additional consultation would also need to take place.

### Referendum

6.16 We will:

- Arrange and fund the referendum.
- Publish information about the neighbourhood development plan.
- Give notice that a referendum is taking place.
- Publish the results of the referendum.

### Making (adoption)

6.17 We will:

- 'Make' (i.e. adopt) the plan, subject to the outcome of the referendum.
- Publish the decision to 'make' a neighbourhood development plan on our website.
- Notify all individual and organisations who asked to be notified.

6.18 We may:

- Issue a press release and e-newsletter to inform people that the neighbourhood development plan has been made (adopted).

## 7. [Engagement process for planning applications](#)

7.1 We are responsible for determining planning applications. This includes applications such as those for:

- Certain extensions and alterations to your home.
- New houses and businesses.
- Changing a building from one use to another.
- New schools, roads, pathways and infrastructure, including telecoms.
- New sites for minerals and waste developments.

7.2 We are not responsible for Nationally Significant Infrastructure Projects (NSIPs), such as changes to the motorway.

7.3 Not all types of development require applications to be made to the council, being permitted automatically under national legislation. This includes some types of house extensions and changes in the use of land or buildings. These are generally referred to as 'permitted development'.

7.4 In addition, some types of development only require our approval on limited aspects of a proposal, such as design and external appearance, transport impacts and flooding information. These are generally referred to as 'prior approval' development. This includes certain changes of use, and certain telecoms apparatus.

7.5 Information on permitted development rights and prior approval can be found on [the Planning Portal](#) website.

### [How we make decisions on planning applications](#)

#### a) What we must consider

7.6 Decisions on planning applications must be made in line with the development plan (adopted local plans and made neighbourhood plans), unless there are 'material considerations' that indicate otherwise.

7.7 A material consideration is a matter that should be taken into account when deciding a planning application. Material considerations can include, but are not limited to:

- Overlooking / loss of privacy.
- Loss of light or overshadowing.
- Parking.
- Highway safety.
- Traffic.
- Noise/odour
- Layout and density of building.
- Design, appearance and materials.
- Access arrangements.
- Effect on public rights of way.
- Effect on listed buildings or conservation areas.
- Effect on trees and hedgerows.
- Government policies, e.g. those set out in the National Planning Policy Framework.
- Human rights (including best interests of children).



7.8 Anything relevant to making the decision can be a material planning consideration. However in general it relates to matters in the public interest rather than private matters (e.g. property values, obstruction of private rights of way or the loss of a view are not material planning considerations).

b) How long we have to decide

7.9 The time periods for determination are set out in law. The time limit is usually:

- 8 weeks for most planning applications.
- 13 weeks for ‘major’ (larger) developments.
- 16 weeks for applications that need an Environmental Impact Assessment.

7.10 If more time is needed to determine an application, an ‘extension of time’ can be agreed between the council and the applicant.

7.11 If we fail to determine the application in time, the applicant can appeal to the Secretary of State against ‘non-determination’.

c) How and when we will involve you in the planning application process

7.12 To assist people considering developing land or buildings, we offer a paid-for discretionary planning advice service/pre-application advice service, to help people understand whether a proposal is likely to be acceptable, and what information they need to provide should they proceed to submit an application. We encourage site promoters to be open about their proposals and to engage with the local community. We also suggest that developers seek advice from other statutory consultees such as the Environment Agency.

Before the application is submitted

7.13 A person proposing to make an application for development is required by law<sup>1</sup> to bring it to the attention of those who live or occupy premises in the vicinity of the site. In addition, we encourage positive engagement with local people to help prepare and refine their proposal. For household extensions this may simply mean speaking to neighbours. For larger proposals, engagement should involve the wider area and should start at an early stage with engagement forming an integral part of the initial design process.

7.14 We encourage anyone proposing development to actively engage the community when preparing their proposals as set out in Table 1 below. The suggested methods vary depending on the scale and type of proposal, with larger proposals expected to use methods that would engage with more people.

**Table 1: Indicative methods of engagement for proposed planning applications by applicants**

Method of engagement	Householder applications	Minor applications	Major applications	Large scale major applications	Other applications
Letters, emails or postcards	√	√	√	√	√

<sup>1</sup> [Localism Act 2011](#), Regulation 122.

One to one meetings*	√				
Website			√	√	
Advert in local press				√	
Public meetings / forums			√	√	
Public exhibitions			√	√	
Social media			√	√	
Workshops				√	
Leaflets			√	√	

\*People considering the extension of their home are encouraged to meet with their neighbours to discuss their ideas.

7.15 In all instances, the comments and concerns raised through engagement should be considered, and if necessary, changes made to the proposed development before an application is submitted. Information on how engagement has been undertaken, the issues raised and how these have been responded to should be submitted as part of the application.

7.16 We will:

- Encourage applicants to consult the community, including the town and parish council, where relevant.

7.17 We may:

- Liaise with town and parish councils, where relevant.

#### Once the application is submitted

7.18 Details of all submitted planning applications can be viewed on our website by entering the site, address, the reference number or via an interactive map.

7.19 The law requires that for most types of planning application that the council consult for a 21 day period (unless a longer period applies) before a decision can be made. Whilst we feel this appropriately balances the need to consult with the time period for determining applications set nationally for many types of application, for major applications we will consult for an extended 28 day period. Major applications are those proposing 10 or more dwellings, or 1,000 square metres of non-residential floorspace.

7.20 We will:

- Make planning applications and the supporting documentation available to view on our website.
- Consult upon applications as set out in law (excluding bank holidays), or in the case of major applications extend this to a 28 day period (excluding bank holidays).
- Notify town or parish councils of relevant planning applications in their area, inviting comments.
- Where required by law, we will either:
  - display a planning notice on or near the application site; or
  - post letters to neighbours adjoining the application site.
- Where a site notice is not required by law, we will send a notice to the agent or applicant and ask them to place this on display voluntarily.

7.21 We may:

- Depending on the nature and scale of the proposed development, post letters to properties beyond those adjoining the application site which may be affected by the proposed development.
- Notify nearby town or parish councils of relevant planning applications in proximity to their area, inviting comments.
- Publish a press notice.
- Consult with other organisations such as the Environment Agency, Natural England, Historic England etc. where applicable.
- Publicise a weekly list of planning applications on the council's website.

7.22 The decision on which properties 'may be affected by the proposed development' is made by the council. This is based on professional assessment of the proposal and its likely impacts on the area surrounding the site, and planning law and guidance.

### [During the determination process](#)

7.23 We will:

- Publish relevant documents on our website, including comments received in response to the application.
- Consider the issues raised response to the application.
- If the application is considered at Planning Committee, provide applicants, town and parish council representatives, and those who have commented on a planning application, an opportunity to register to speak at Planning Committee.<sup>2</sup>

7.24 Due to the volume of representations received it is simply not possible to acknowledge or enter correspondence regarding all the representations submitted. You can however be assured that all relevant matters raised are fully considered.

7.25 Representations from local people are very important in highlighting material planning considerations. Then ultimately applications are determined in accordance with current legislation, development plan policy and all the material considerations identified.

7.26 The consideration of each application is led by a case officer. Their role will be to assess the application against development plan policy and other material considerations. They will read all representations and summarise the key points raised when preparing their report which will consider and explain whether the application should be permitted or refused.

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<sup>2</sup> Further details of [asking to speak at planning committee](#) are available on the council's website.

7.27 Some applications will be determined by the Planning Committee, rather than officers. The Planning Committee is made up of elected councillors. For these applications, the case officer provides their report and recommendation to Planning Committee who decide whether the application is permitted or refused.

7.28 Where an application is to be considered by the Planning Committee, anybody that has submitted a representation will be notified of proceedings. Planning Committee meetings are open to the public.

#### [After we have made a decision](#)

7.29 We will:

- Publish the decision notice and officer report on our website.
- Inform the agent (or in the absence of an agent the applicant) of the decision, usually by email.

#### [If the planning decision has been appealed](#)

7.30 If the applicant does not agree with our decision, they have the right to appeal to the Planning Inspectorate. In these cases we will write to everyone who has been consulted or has submitted representations on the planning application, letting them know about the appeal. Further representations are sent at this stage directly to the Planning Inspectorate for consideration. We will publish any relevant appeal documents on our website.

## 8. [Dealing with unauthorised development](#)

- 8.1 Sometimes, development goes ahead without planning permission or without meeting all the specified planning conditions. This is known as 'unauthorised development'. When this happens and where resources permit, our planning enforcement team will investigate and, where appropriate, expedient and in the public interest, may take formal enforcement action. Planning Enforcement action is discretionary.

### [How we make decisions on unauthorised development](#)

- 8.2 We will undertake our enforcement duties as set out in our [Local Planning Enforcement Plan](#).
- 8.3 You can view more information on the planning enforcement process and the types of actions available with unauthorised development on [GOV.UK](#) website.

### [How and when we will involve you in enforcement matters](#)

- 8.4 If you suspect a breach of planning control, the best way to report concerns is via our [website](#). If you are unable to do this, please write to the Planning Enforcement, Wokingham, Borough Council, Shute End, Wokingham, RG40 1BN or call the customer line 0118 974 6000.
- 8.5 An overview of the service and what you can expect from this process is set out in our [Local Planning Enforcement Plan](#).

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# WOKINGHAM BOROUGH COUNCIL

## Statement of Community Involvement, March 2024

### Adoption Statement

Notice is hereby given that the Statement of Community Involvement (SCI) was adopted by Wokingham Borough Council on [DATE TO BE INSERTED].

The SCI sets out how the council we ensure effective community involvement at all stages in the land use planning process. It explains how people can be involved in the preparation of local plans, neighbourhood development plans, supplementary plans, and the consideration of planning applications. It also sets out what is expected from those proposing developments.

Any person with sufficient interest in the decision to adopt the SCI may make an application to the High Court for permission to apply for judicial review of the decision. Any such application must be made promptly in any event no later than 6 weeks after the date on which the SCI was adopted.

The adopted SCI and a statement summarising the main issues raised during the formal consultation period and a copy of this adoption statement can be viewed on the council's website at: [WEB HYPERLINK TO BE INSRTED] and inspected free of charge at:

Wokingham Borough Council, Shute End, Wokingham, RG40 1BN.  
Monday to Friday 9am-5pm (excluding bank holidays).

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<b>TITLE</b>	<b>Responsible body status (Biodiversity Net Gain)</b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	(All Wards);
<b>LEAD OFFICER</b>	Director, Place and Growth - Giorgio Framaliccio
<b>LEAD MEMBER</b>	Executive Member for Environment, Sport and Leisure - Ian Shenton

## **PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

The purpose of the report is to seek Executive approval to apply to the Department for Environment, Food & Rural Affairs (Defra) to become a Responsible Body (RB) and to enact the Council to be an RB should the application be successful.

Becoming an RB will allow Wokingham Borough Council to agree conservation covenants with landowners who wish to sell biodiversity units to developers. This approach will support the Council in ensuring a local market for Biodiversity Net Gain (BNG) units and BNG opportunities are maximised within the borough as opposed to developers needing to purchase units outside of the borough or from Natural England through the statutory biodiversity credit scheme.

With Wokingham Borough Council (WBC) as a RB, it will offer more options to landowners in the Borough to secure their land for long term conservation purposes, providing more opportunities for privately owned land in the borough to achieve beneficial habitat and environmental enhancements that will deliver wider public benefits.

The resource required in relation to becoming an RB will be staff time to make and progress the application in year 1 and it is considered that this will be achieved within existing resources. Future costs associated with being an RB (compliance checking, management plan reviews, enforcement, reporting) will be covered through a mechanism within the conservation covenants.

## **RECOMMENDATION**

That the Executive:

1. Authorise the Director of Place and Growth to apply to the Department for Environment, Food & Rural Affairs (Defra) for Wokingham Borough Council to become a Responsible Body.
2. Authorise the Director of Place and Growth to enact being a Responsible Body should the application be successful.

## **EXECUTIVE SUMMARY**

Executive approval is being sought to apply to the Department for Environment, Food & Rural Affairs (Defra) to become a Responsible Body (RB) in order to (where appropriate)

enter into conservation covenants with landowners in support of delivering Biodiversity Net Gain (BNG) within the borough.

BNG is an approach that ensures biodiversity is in an improved measurable state than before development took place. Mandatory BNG, which came into force for major developments on 12<sup>th</sup> February 2024, will ensure the creation of new or enhanced existing greenspaces that deliver improvements for wildlife habitats.

A conservation covenant will set out what a landowner (who will be delivering the units) and RB must do to help conserve the land and once agreed will become legally binding. The conservation covenant will ensure that the BNG enhancements are being managed and monitored appropriately for the required timeframe (at least 30 years).

Becoming an RB will allow Wokingham Borough Council to agree conservation covenants with landowners who wish to sell biodiversity units to developers (in order that they achieve mandatory BNG). This approach will support the Council in ensuring BNG opportunities are maximised within the borough as opposed to developers needing to purchase units outside of the borough or from Natural England through the statutory biodiversity credit scheme. Any BNG units generated in Wokingham would most likely be used to meet the demand from development within the Borough, however they could also be used to provide for needs in neighbouring authorities and/or nationally.

With WBC as an RB, it will be easier for landowners in the Borough to secure their land for long term conservation purposes, providing more opportunities for privately owned land in the borough to achieve beneficial habitat and environmental enhancements that will deliver wider public benefits. In addition to the wildlife benefits of biodiversity improvements in the borough, a local market of BNG units will deliver wider public benefits such as improved air quality, mental and physical health benefits and support with adaptation to climate change.

The risk of not becoming an RB will be that the Council will not be able to help third party landowners bring forward land for long term conservation purposes and sell biodiversity units to developers. If there is an undeveloped local supply of BNG units or not enough RB's to enter into Conservation Covenants to monitor the units that are available, there is a greater risk that developers will seek their off-site BNG units from suppliers outside of the local area; thereby not providing the Borough with the immediate benefits.

Subject to Executive approval, once an application has been submitted to Defra, they will require 12 weeks to determine the application. If accepted as an RB, the Council will need to register any conservation covenants it creates on the appropriate local land charges register and will need to submit an annual return by 31 March each year for the conservation covenants it holds.

## **BACKGROUND**

As part of the Environment Act 2021, from 12<sup>th</sup> February 2024 Mandatory Biodiversity Net Gain (BNG) will be required for all major developments, with smaller sites requiring compliance with mandatory BNG from 2nd April 2024.

The Environment Act sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan
- Habitat secured for at least 30 years via obligations/ conservation covenant
- Habitat can be delivered on-site, off-site or via statutory biodiversity units
- There will be a national register for off-site net gain delivery sites
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss
- Will also apply to Nationally Significant Infrastructure Projects (NSIPs)
- Does not change existing legal environmental and wildlife protections

Whilst this change to the planning system will involve some additional regulatory requirements, there are also opportunities for the Council as a landowner, to be a provider of BNG units through the ecological enhancement of existing Council owned sites such as Countryside Sites, Public Open Spaces and farmland. The Government envisages a market approach to the provision of off-site BNG units where the income received through the sale of BNG units should cover all of the capital, monitoring and ongoing maintenance costs (for at least 30yrs) and provide a capital receipt to the landowner. This is something that Officers are already working on implementing on Council owned land as part of the BNG Pilot Project approved by Executive in March 2023.

Executive approval is now being sought to apply to the Department for Environment, Food & Rural Affairs (Defra) to become a Responsible Body (RB) in order to enter into conservation covenants with landowners in support of delivering BNG within the Borough. A conservation covenant will set out what a landowner and RB must do to help conserve the land and once agreed will become legally binding. The conservation covenant will ensure that the BNG enhancements are being managed and monitored appropriately for the required timeframe (at least 30 years). BNG is an approach to development, land and marine management that ensures biodiversity is in an improved state than before the development took place. Mandatory BNG will ensure the creation of new or enhanced existing greenspaces; delivering nature improvements to benefit both wildlife and the public.

## **BUSINESS CASE**

Biodiversity includes every one of us, and although we as humans currently pose its greatest threat, we also offer the only hope for protecting and conserving the diversity of life for future generations. The natural environment has been modified by human activity and many existing wildlife habitats face pressure from development threats or high recreational use. Despite this there is still a great variety of wildlife which can be found locally in Wokingham and opportunities for biodiversity enhancements across the borough.

Becoming a RB will allow Wokingham Borough Council to agree conservation covenants with landowners who wish to generate and sell biodiversity units to developers. This approach will support the Council in ensuring a local market for BNG units develops and BNG opportunities are maximised within the borough as opposed to developers needing to purchase units outside of the borough or from Natural England through the statutory biodiversity credit scheme. Any BNG units generated in Wokingham would most likely used to meet the demand from development within the Borough however they could also be used to provide for needs in neighbouring authorities and/or nationally.

With WBC as an RB, it will offer more options to landowners in the Borough to secure their land for long term conservation purposes, providing more opportunities for privately owned land in the Borough to achieve beneficial habitat and environmental enhancements that will deliver wider public benefits. In addition to the wildlife benefits of biodiversity improvements in the borough, a local market of BNG units will deliver wider public benefits such as improved air quality, mental and physical health benefits and support with adaptation to climate change.

The risk of not becoming an RB will be that the Council will not be able to help third party landowners bring forward land for long term conservation purposes and sell biodiversity units to developers. If there is an undeveloped local supply of BNG units or not enough RB's to enter into Conservation Covenants to monitor the units that are available, there is a greater risk that developers will seek their off-site BNG units from suppliers outside of the local area; thereby not providing the borough with the immediate benefits. If there are no (or few) other RBs in the local area this will mean that developers have fewer options for the purchase of off-site biodiversity units and may not be able to meet the minimum 10% mandatory BNG requirement.

Where the 10% mandatory BNG cannot be achieved, the Council will not be able to grant planning permission unless the developers can provide all their biodiversity units within the development site, through another RB (if there is another one available to provide the units) or they are willing to purchase statutory credits from Natural England. Natural England will be selling statutory biodiversity credits on behalf of the Secretary of State however units purchased through this route will be at a significantly higher price, as set by Defra. Units purchased through this route are also unlikely to benefit local biodiversity.

It is therefore considered that applying for RB status will support in the delivery of the council aim to continue to be a clean and green Borough with biodiversity enhancements within the borough to provide local environmental benefits as well as supporting in the delivery of the development management process.

To apply for RB Status, the Council must send an application form to Defra. This will enable Defra to check that Wokingham Borough Council meets the criteria to become and remain a RB. These criteria are:

- eligibility (all local authorities are eligible)
- financial security – that the organisation has a UK bank account, that the organisation's financial situation is secure, that the organisation has adequate internal fiscal and administrative control for long term financial viability
- operational capacity and capability – the organisation must have the capacity and capability to manage and enforce the types of covenants it expects to enter into. Checks may include access to relevant expertise (such as ecologists), ability to work with landowners, ability to monitor and enforce legal agreements, and that we have a track record in dealing with environmental or heritage issues.
- ongoing suitability – once the organisation gains RB Status it must continue to meet the criteria for being one. Defra must be informed if the organisation's circumstances change, and it may no longer meet one or more of the criteria

If accepted as a RB, the Council will need to register any conservation covenants it creates on the appropriate local land charges register and will need to submit an annual return by 31 March each year for the conservation covenants it holds. The annual return must include:

- total number of conservation covenants the organisation holds
- the area of land covered by each conservation covenant

The information required can be gathered by Officers at the time that conservation covenants are agreed so it is considered the annual monitoring required for conservation covenants can be delivered through existing resources.

Importantly, a local authority cannot act as both RB and landowner in the same conservation covenant agreement. Where the Council requires a conservation covenant as a landowner (in order to generate and sell BNG units on the market), they will need to agree a covenant with another RB. In these cases, it is expected that a reciprocal arrangement with adjacent authorities (who have achieved RB status) can be agreed and Officers are currently in conversations with neighbouring authorities on this matter. A conservation covenant is a legal agreement between an RB and a landowner. If the Council is acting as an RB, it would only progress that legal agreement if there is an undertaking by the landowner to cover the Council's legal costs. Where the Council is acting as a RB, they will have enforcement powers to take action if through the reporting and monitoring, the Council establishes that the landowner is not compliant with the conservation covenant. It is expected that a reserve fund would be worked into the conservation covenant to cover this potential cost. As an RB, the Council will only agree a conservation covenant that has a mechanism to cover future costs to the Council (compliance checking, management plan reviews, enforcement, reporting). This is likely to be an upfront contribution in order to reduce the financial risk.

It is important to remember that if the Council becomes an RB, there is no mandatory requirement to agree conservation covenants. Therefore, the Council will only enter agreements where the financial risk has been mitigated as above.

## **Timescales**

The national register for BNG went live on 12<sup>th</sup> February 2024. The longer the delay in the Council becoming an RB, the greater the risk that developers will work with suppliers outside of the local area to achieve their mandatory BNG because there is an under-developed market locally.

Once an application has been submitted, Defra will aim to inform the Council of the outcome of the request within 12 weeks. If the Council's application is successful, Defra will add its contact details and main areas of expertise to the list of designated RBs.

## **FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Nil - Staff time to progress the application	Can be achieved within existing resource	
Next Financial Year (Year 2)	Cost neutral	Monitoring costs will be recovered through conservation covenants	
Following Financial Year (Year 3)	Cost neutral	Monitoring costs will be recovered through conservation covenants	

### **Other Financial Information**

There are no costs associated with the application and receiving the RB status other than staff time to put the application in which can be covered from within existing staffing resources. RB status once received will incur costs in carrying out these duties, which could include a need for additional staff, however all costs incurred are rechargeable to the organisation requesting the service meaning no financial loss to WBC.

Where the Council generates and sells BNG units on its own landholdings, the set unit price for BNG units sold to developers will incorporate the resource required for monitoring and managing the units.

As a RB the Council will only agree a conservation covenant that has a mechanism to cover future costs to the Council (compliance checking, management plan reviews, enforcement, reporting). This is likely to be an upfront contribution in order to reduce the financial risk. It is important to remember that if the Council becomes a RB, there is no mandatory requirement to agree conservation covenants, therefore the Council will only enter agreements where the financial risk has been fully mitigated.

The annual reporting requirement for being a RB will be covered from within existing resources.

### **Legal Implications arising from the Recommendation(s)**

This report and decision-making process arising from the same has been considered by the Legal Officer within the context of the Constitution and public law

### **Stakeholder Considerations and Consultation**

Green Infrastructure Officers are working in partnership with Countryside, Cleaner and Greener and Property Officers to explore opportunities within the Council's landownership for BNG enhancement opportunities to support in the delivery of BNG units.

### **Public Sector Equality Duty**

Equality assessment has been undertaken and approved by the Inclusion team. The Stage 1 EqIA has been saved in the central archive.

**Climate Emergency – *This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030***

By becoming a RB, the Council will be able to support third party landowners in conserving their land by selling BNG units required for mandatory BNG. The delivery of BNG units will include the creation and enhancement of species rich environments, including new woodlands, scrub and grassland enhancements that will all deliver a positive contribution to the Climate Emergency Action Plan.

**Reasons for considering the report in Closed Session**

N/A

**List of Background Papers**

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<b>TITLE</b>	<b>Barkham Solar Farm Update</b>
<b>FOR CONSIDERATION BY</b>	The Executive on 14 March 2024
<b>WARD</b>	Barkham
<b>LEAD OFFICER</b>	Deputy Chief Executive - Graham Ebers
<b>LEAD MEMBER</b>	Leader of the Council and Executive Member for Housing - Stephen Conway

## **PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

The purpose of this report is to provide an update on the Barkham Solar Farm Business Case and progress report following the conclusion of the procurement process.

The delivery of the Barkham Solar Farm is identified as a key priority of the Council's Climate Emergency Action Plan.

The project will also generate a considerable net income for the Council over 25 years which will be introduced into the Council's annual budget using an equalisation reserve.

Climate Emergency Overview & Scrutiny Committee considered this report and its content at their meeting on 29 February 2024. Executive are asked to consider their recommendations on this topic.

## **RECOMMENDATION**

That the Executive

- 1) Note the update to the Barkham Solar Farm business case and progress report as detailed herein.
- 2) Considers the recommendations from Climate Emergency Overview & Scrutiny Committee on 29 February 2024

## **EXECUTIVE SUMMARY**

The financial business case for the Barkham Solar Farm was initially considered and approved by Executive in July 2021 and by Full Council in September 2021. At a Special Council Executive meeting on 30 June 2022, both Executive and Council approved the procurement business case for the contractor. In approving the procurement business case the Executive further resolved that an updated business case and progress report will be reported back to the Executive following the conclusion of the procurement process. This report sets out the progress report and an updated business case.

Full planning permission for the project has now been secured and, following extensive and positive engagement with SSEN and National Grid, the Council are now in contract with SSEN for connection to the grid in Summer 2026. A contractor has been appointed

and the project is now progressing through detailed design. Main construction of the solar farm is expected in Spring/Summer 2025, for first operation in 2026.

The current forecasts identify a capital expenditure of £25.18m, and a net income (after running costs and capital financing costs) of £68.52m over the 25 year life of the development (equal to £2.74m per annum on average).

The forecasted net income compares extremely favourably against the £480k per annum identified when the Executive/Council considered/approved the business case in 2021. The forecasted returns also significantly exceed the £200k per annum threshold that allows for delegation of decision making around the final extent and configuration of the Solar Farm to the Deputy Chief Executive (S151 Finance Officer) in conjunction with the Lead Member.

The MTFP currently identifies an equalised net surplus, after capital financing costs, of circa £1m per annum from the Barkham Solar Farm. Based on the current forecasts, the scheme would deliver (and exceed) the current MTFP expectations.

## **FOR INFORMATION: CLIMATE EMERGENCY OVERVIEW AND SCRUTINY COMMITTEE**

The Council's Climate Emergency Overview and Scrutiny Committee considered the below progress report and business case update on 29<sup>th</sup> February 2024. The Committee resolved the following:

- 1) That progress on the delivery of the Barkham Solar Farm be noted; and
- 2) That further progress reports be submitted to the Climate Emergency Overview and Scrutiny Committee at appropriate points in the project.

### **PROGRESS REPORT**

In response to the rising concern over the urgent need for action, in 2019 Wokingham Borough Council (WBC) declared a climate emergency. The Council subsequently published its Climate Emergency Action Plan (CEAP), which is subject to ongoing monitoring and review. Renewable energy generation remains a key priority of the CEAP and the Barkham Solar Farm is a specific project/target identified therein.

The financial business case for the Barkham Solar Farm was initially considered and approved by Executive in July 2021 and by Full Council in September 2021. Since that time the industry has experienced considerable inflation in build costs and interest rates have risen. At the same time however there has been an unprecedented rise in energy prices. Whilst it is therefore evident that the solar farm will now cost more to build than was forecasted back in 2021, the forecasted returns to the Council have significantly improved also.

Full planning permission for the project was secured in January 2022 and in May 2022 the Council received a grid connection offer from SSEN for connection to the grid by 2026.

At a Special Council Executive meeting on 30 June 2022, both Executive and Council approved the procurement business case for the contractor and delegated authority to the Director of Resources and Assets, in consultation with the Executive Member for Finance and the Executive Member of Climate Emergency and Residents Services, to implement the strategy. At the meeting the Executive further resolved that an updated business case and progress report will be reported back to the Executive following the conclusion of the procurement process; hence the reporting herein.

The Council appointed Bouygues (now Equans) early in 2023. They have initially been appointed on a Pre-construction Services Agreement (PCSA) contract for surveys and design works only. Once completed, it is intended that Employer Requirements will be formulated into agreed Contractor's Proposals and a contract sum agreed upon using an open book tendering process to arrive at a 'best value' proposal for WBC (the Employer). Award of the main JCT Design & Build Contract for the Stage 2 construction will follow.

The project therefore had been progressing in good faith against the grid connection offer received from SSEN. However, in March 2023 SSEN advised WBC that they could now not connect the solar farm to the grid until 2037 due to up-grades to the grid required at transmission level. This put the project at significant risk.

Extensive and positive engagement with SSEN and National Grid followed; culminating in WBC receiving a revised connection offer of August 2026. In January 2024 the Council formally accepted the offer and the connection date is now in contract. The project is therefore once again progressing for delivery in 2026. The agreement to a 2026 connection date mitigates a significant risk to the delivery of the project.

Equans had stood down pending resolution of the connection issue with SSEN and National Grid. They have now remobilised and are in the process of undertaking survey and detailed design work under the Pre-Construction Services Agreement. Planning submissions will follow in due course pursuant to the various planning conditions; with the final contract sum for construction to be agreed between Equans and the Council towards the end of this year. Main construction of the solar farm is expected in Spring/Summer 2025, for first operation in 2026.

The currently anticipated delivery programme for the project is as follows:

Survey / Design Work	Ongoing
Parish Council and Stakeholder Up-dates	Mar/Apr
Submission to planning – Conditions – First Tranche	Apr/May
Submission to Planning – Conditions – Second Tranche	July
Agree contract sum with Equans and enter into construction contract	By end 2024
Initial Construction Works	Dec/Jan 24/25
Main Construction (2-3 months)	Spring/Summer 25
Off-site Grid Connection Works (SSEN Works) (6-9 months)	Tbc
Grid Connection / First Operation	Summer 26

## THE FINANCIAL BUSINESS CASE

The business case has evolved over the life of the project as costs and values have changed.

The original business case for the solar farm was approved by Executive and Council in Summer 2021. An updated financial business case was subsequently presented to, and supported by, the Council’s Overview and Scrutiny Management Committee on 5th October 2022.

The table below sets out the historic financial forecasts for the project, as reported in Summer 2021 and October 2022; together with the current (January 2024) financial forecast for the project shown in the right hand column. Note: figures in red/brackets indicate income/surplus, figures in black (without brackets) indicate expenditure:

	Summer 2021 £m	October 2022 £m	January 2024 £m
<b>Capital Expenditure</b>			
Capital cost	20.28	26.85	25.19

<b>General Fund - Income and Expenditure</b>			
Revenue income	(59.37)	(126.50)	(129.17)
Revenue operating expenditure	14.42	19.48	19.01
<b>Revenue operating surplus</b>	<b>(44.95)</b>	<b>(107.02)</b>	<b>(110.16)</b>
Repayment of capital expenditure	20.28	26.85	25.19
Interest costs	12.68	13.01	16.44
<b>Revenue surplus after financing costs</b>	<b>(11.99)</b>	<b>(67.16)</b>	<b>(68.52)</b>
<i>Average surplus per year</i>	<i>(0.48)</i>	<i>(2.69)</i>	<i>(2.74)</i>

A breakdown of the forecasted Capital Costs of the project, together with the General Fund Income and Expenditure forecast, is included at Part 2 of this report.

The business case for the project makes assumptions around the export price of the energy and annual fuel price inflation across the 25 years of the project – as is set out in the Part 2 papers. Sensitivity testing around these assumptions is also included in the Part 2 papers.

The returns indicated above compare extremely favourably against the £480k per annum identified when the Executive/Council considered/approved the business case in 2021. The forecasted returns also significantly exceed the £200k per annum threshold that allows for delegation of decision making around the final extent and configuration of the Solar Farm to the Deputy Chief Executive (S151 Finance Officer) in conjunction with the Lead Member, as per the 2021 Executive/Council approvals.

The MTFP currently identifies an equalised net surplus, after capital financing costs, of circa £1m per annum from the Barkham Solar Farm. Based on the current forecasts, the scheme would deliver (and exceed) the current MTFP expectations.

### **Additionality**

Whilst business rates are included in the business case as a project expenditure, the forecast does not record any of the revenue that WBC will receive corporately through the retention of business rates payable by the Solar Farm. WBC could retain up to 100% of business rates paid against renewable energy projects; in which case the Solar Farm could potentially generate circa £2m of additional revenue to the Council over the 25 years of the facility.

### **NON-FINANCIAL BENEFITS OF THE SOLAR FARM**

The past few years have shown how reliant the UK remains on imported fossil fuels, with costs soaring due to disruption from the war in Ukraine and increased demand from

other countries. By generating renewable energy locally and putting it back into the grid, schemes like this have a significant part to play in securing sustainable power supplies, stabilising the costs of energy, and helping protect residents from further cost of living crisis in the longer term.

### **Contribution to CEAP targets**

#### **Target 2.1.1 - Deliver the installation of a solar farm in Barkham with the capacity to generate in excess of 29 MWp of energy.**

The Barkham Solar Farm is an integral part of the CEAP; comprising a specific target therein estimated to contribute a carbon saving of 6,121 tCO<sub>2</sub>e.

In addition to delivering against target 2.1.1 of the plan, the project will also contribute towards the Council meeting the following CEAP targets:

#### **Target 1A.4.5 - Develop the Local Cycling and Walking Infrastructure Plan (LCWIP) to be Borough wide and implement 50% LCWIP by 2030.**

The Solar Farm project will provide a new Greenway from the southern boundary (linking into the existing Greenway running along the northern boundary of California Country Park) up to the northern boundary of the site. This section of Greenway will be the first segment of a new Greenway Route identified in the LCWIP and intended in time to connect the Arborfield SDL into Barkham and then beyond into Wokingham as part of the Council's Local Cycling and Walking Infrastructure Plan.

#### **Target 4.1.2 - Deliver small-scale woodland planting on council estate in existing parks and opens spaces sites to improve carbon capture and biodiversity net gain.**

The Barkham Solar Farm project includes a 2.66ha band of woodland planting along the southern boundary of the site which will include the planting of circa 5,800 new trees in the 2024/25 planting season. The Solar Farm woodland planting will be a continuation of (and in addition to) the 7.7ha of tree planting (approximately 7,000 new trees) proposed under the Covid Memorial Woodland project on the adjacent site (see Executive resolution of 21/03/23).

In addition, new tree planting has already been provided at the site in the form of a new fruit tree nursery and further tree planting will be brought forward as part of the wider Solar Farm landscaping proposals – final details of which will need to be developed over the coming months and submitted for approval under the conditions of the planning permission.

In terms of the fruit tree nursery already planted, the Council worked with Freely Fruity (a local charity) to identify and provide the land on the site, secure the necessary consents and enter into lease. Freely Fruity supports community groups, schools, Town and Parish council's, etc, in providing free fruit, vegetables and more recently have been donating fruit trees across the borough to deliver new community orchards. The trees they have planted are contributing to the council's tree planting target and all food grown on site is donated to local food banks and other charities.

### **Other (Non-specific CEAP) Benefits**

Through grassland enhancement and woodland creation, as well as hedgerow improvements and new hedgerow planting, the project will provide a significant uplift in

biodiversity at the site. A Biodiversity Net Gain Assessment submitted at the time of the planning application indicated potential for an uplift in area based habitat units of 162% and in hedgerow units of 63%; which is well in excess of the 10% biodiversity net gain generally expected with major planning applications. Final details of the biodiversity net gain at the site will be measured and recorded in due course following the finalisation and approvals of the detailed design of the landscaping proposals.

In addition to the above, prior to the commencement of construction an Employment Skills Plan will be developed with the contractor and in consultation with the Council's Economic Development Team. The intention of this plan will be to explore how the project can provide opportunities for local employment, training, apprenticeship, and/or other vocational initiatives to develop local employability skills.

## **KEY PROJECT RISKS**

### **Grid Connection:**

The delivery of the project and the commencement of operation of the solar farm (and the revenue to the Council thereafter) is subject to the scheme connecting into grid. At this time the Council has entered into a contract to connect to the grid in 2026. The Council are however beholden to SSEN for delivery of the connection. The project team will continue to work proactively with SSEN to facilitate this connection date – and explore opportunities to potentially bring that date forward if achievable.

### **Inflating Costs:**

The business case has been informed by market experts and a prudent approach to pricing has been taken at this stage. Final construction costs will not however be fixed until the construction contract is awarded towards the end of this year.

### **Fluctuating Energy Prices/Revenues:**

Electricity prices will be influenced by government and grid developments on energy pricing over the coming years. The approach to energy prices adopted within the financial forecasting – as is set out in Part 2 – has therefore been prudent.

Sensitivity testing around the assumed electricity export prices and annual fuel inflation across the 25 years has been included in the Part 2 papers. Whilst the financial information looks extremely positive, it nevertheless remains that a number of risks sit outside of WBC's control. The Council therefore remain prudent in the assumption of circa £1m per annum currently included within the MTFP.

## FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

***The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	£285k	Yes	Capital
Next Financial Year (Year 2)	£2m	Yes	Capital
Following Financial Year (Year 3)	£18m	Yes	Capital

### **Other Financial Information**

The financial business case for the solar farm was considered and approved by Executive in July 2021 and by Full Council in September 2021.

The MTFP identifies an equalised net surplus, after capital financing costs, of circa £1m per annum from the Barkham Solar Farm. The project is forecasted to exceed this provision.

### **Legal Implications arising from the Recommendation(s)**

None

### **Stakeholder Considerations and Consultation**

The project has been subject to extensive stakeholder consultation as part of the planning process. Further engagement with stakeholders will occur, including setting up a community liaison group, as the scheme progresses through to delivery.

### **Public Sector Equality Duty**

An Equality Impact Assessment has been undertaken. The Initial Impact Assessment did not identify any potentially negative impacts upon persons with protected characteristics

### **Climate Emergency – *This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030***

Generation of renewable energy through investment in solar farms is identified as a key priority under the Climate Emergency Action Plan (CEAP). The delivery of the Barkham Solar Farm is a specific target identified therein.

### **Reasons for considering the report in Closed Session**

By Virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).



<b>List of Background Papers</b>	
PART 2 – Barkham Solar Farm Capital Cost	
PART 2 – Solar Farm General Fund Income and Expenditure	
PART 2 – Notes and Assumptions	
<b>Contact</b> David Smith	<b>Service</b> Commercial Property
<b>Telephone</b> Tel: 0118 974 6230	<b>Email</b> david.smith2@wokingham.gov.uk

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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<b>TITLE</b>	<b>Shareholders Committee</b>
<b>FOR CONSIDERATION BY</b>	The Executive on Thursday, 14 March 2024
<b>WARD</b>	(All Wards);
<b>LEAD OFFICER</b>	Deputy Chief Executive - Graham Ebers
<b>LEAD MEMBER</b>	Leader of the Council and Executive Member for Housing - Stephen Conway

## **PURPOSE OF REPORT (INC STRATEGIC OUTCOMES)**

Authorisation to form a Committee of Executive to act as Shareholder representative to enhance governance for housing companies owned by Wokingham Borough Council.

## **RECOMMENDATION**

That the Executive:

- 1) Approves the creation of Shareholder Committee as detailed in this report to ensure that its housing companies act in the interests of the Council as shareholder and /or lender and contribute to the Council's objectives.
- 2) Notes the draft Terms of Reference at set out at Appendix 1 and delegates approval of final terms to the Deputy Chief Executive and Director of Resources & Assets in consultation with the Leader of the Council.
- 3) Delegates authority to the Deputy Chief Executive and Director of Resources & Assets to agree final terms and enter into each Memorandum of Agreement with each relevant company.
- 4) Notes the feedback from the 4<sup>th</sup> March 2024 meeting of the Community and Corporate Overview & Scrutiny Committee which have been incorporated into this report.

## **EXECUTIVE SUMMARY**

1. Wokingham Borough Council is committed to maintaining strong and robust governance to ensure the decisions that are taken are made in conjunction with, and in the best interests of, the communities it serves. As part of this commitment, the Council regularly reviews its governance arrangements alongside learning best practice with other authorities to ensure the Council continues to meet its statutory obligations in the most effective way.
2. The Council owns four local authority trading companies covering housing services (Wokingham Housing Ltd (WHL), Loddon Homes Limited (LHL) and Berry Brook Homes Ltd (BHL)) and adult social care services (Optalis Ltd – jointly owned with Royal Borough of Windsor & Maidenhead). A holding company (Wokingham Holdings Ltd) is in place to provide oversight of the trading companies.

3. Oversight of companies has, historically, been exercised through councillors being appointed as non-executive directors to the companies with regular public reports being presented to Executive and statements to full Council.
4. In 2023, Wokingham Holdings Ltd commissioned an independent review (“the Altair review”) of its local housing companies to assess overall governance arrangements and reinforce best practice to deliver statutory arrangements. The review recommended that, “the Council reconsiders board composition and the role of and location of councillors in providing oversight of the companies. The Council may also consider the terms of reference, membership and role of a strengthened shareholder committee.”
5. The latest best practice guidance on local authority trading companies also indicates that the most effective form of governance and control is through the establishment of a Shareholder Committee.
6. It is believed that the recommendations proposed will improve the governance arrangements of the Council’s housing companies and allow the Council to closely monitor its interest with further clarity, transparency, and reporting.
7. The proposed Shareholder Committee will be a sub-committee of the Executive and therefore an Executive decision is needed.

## **BACKGROUND**

### **1 Current Governance Arrangements**

- 1.1 The Council has several companies which it either owns or has an interest in, which were formed to deliver council objectives in a more efficient and effective manner.
- 1.2 The Council owns four local authority trading companies covering housing services (Wokingham Housing Ltd (WHL), Loddon Homes Limited (LHL) and Berry Brook Homes Ltd (BHL)) and adult social care services (Optalis Ltd – jointly owned with Royal Borough of Windsor & Maidenhead). A holding company (Wokingham Holdings Ltd) is also in place to provide oversight of the trading companies.
- 1.3 All Wokingham companies currently have their own company boards in place to manage the activities and performance of each subsidiary. The boards comprise company directors made up of Councillors, Officers, and independent persons.
- 1.4 The Council wants to ensure that good governance and accountability is in place with respect to its Council owned housing companies and it is keen to learn from other local authorities' experiences. Recent public interest reports from external auditors highlight where, governance arrangements were not strong enough and the recommendations in this report are aimed at covering these areas of risk.
- 1.5 Oversight of companies has, historically, been exercised through councillors being appointed as non-executive directors to the companies with regular public reports being presented to Executive and statements to full Council.
- 1.6 In addition, Wokingham (Holdings) Limited has been established to ensure the operation of the Council's companies is conducted in an efficient manner, and coordinated as a group.

### **2 Proposals**

- 2.1 In 2023, Wokingham Holdings Ltd commissioned an independent review (“the Altair review”) of its local housing companies to assess overall governance arrangements and reinforce best practice to deliver statutory arrangements. The review recommended that, “the Council reconsiders board composition and the role of and location of councillors in providing oversight of the companies. The Council may also consider the terms of reference, membership and role of a strengthened shareholder committee.”
- 2.2 Apart from Optalis Limited, the Council is the sole shareholder in its subsidiaries and should be kept informed of each of its subsidiary's operations and performance. To support the Council in carrying out its role as a shareholder it is proposed that a Shareholder Committee should be established to perform the shareholder function on behalf of the Council across its housing companies.
- 2.3 The general legal concept is that shareholders own the company (such as the Council in respect of Council owned companies), whilst directors run companies. The directors of companies are empowered to run the relevant company so long

as they do so in accordance with its company constitution and in line with their directors' duties. (Some activities, such as amending the constitution of a company, will always require the input of shareholders, by virtue of the Companies Act). If the shareholders do not like how the company is being run by the directors, then it is open to them to remove the directors and replace them with others; directors are required to act independently of the shareholders and utilise their independent judgement to take decisions as to how the company is run.

### **3 Shareholder Committee**

- 3.1 The shareholder committee will perform the shareholder's function and lender scrutiny on behalf of the Council for its housing companies. This committee will consist of 5 Councillors made up of elected Executive members, 1 non-voting opposition member, with Council officer advisors as required.
- 3.2 Executive is being asked to delegate specific powers to the Shareholder Committee by way of a terms of reference (Appendix 1) to be included within the constitution. It is currently envisaged that the Shareholder Committee will be convened at least three times a year to provide direction and scrutiny of the housing companies' business plan, annual reports and performance. The committee will also refer any significant issues of concern for Executive consideration and determination as required.
- 3.3 It is recommended that reports from the housing companies are considered by the Shareholder Committee at general intervals such as a mid- year report and at the end of financial year full report of all the Council owned companies. Executive will retain responsibility for the following functions in relation to the Council's companies:
  - The establishment of any new company or entity
  - The decommissioning/winding up of existing companies or entity
  - Scheme of delegations to the Shareholder Committee
  - Subject to approval of this report, the determination of for the provision of investment of funds or assets or any lending facilities from the Council to the Council's companies will be determined by Executive Member for Finance and Governance.
- 3.4 Shareholder Committee Membership to be set with four Executive Members comprising of the Leader (as Chair), Deputy Leader, Executive Member for Business & Economic Development, and Executive Member for Finance. In addition, a non-voting member of the opposition will be invited to join the Committee. The main opposition group leader will be invited to nominate their opposition member of the Committee. This will be kept under review and can be amended as appropriate.

### **4 Memorandum of Agreement**

- 4.1 In addition to the establishment of a shareholder committee, it is recommended as good practice that a Memorandum of Agreement is drafted and will apply to all Wokingham companies. The agreement should contain core terms which could be applied to all the Council's companies and how the Shareholder Committee will

interact with the housing companies but may well need to contain additional bespoke or modified terms for each company depending on what the company is doing (i.e. what business it is in / markets it trades in etc.) and its size etc.

- 4.2 The Memorandum of Agreement will contain a list of "reserved matters" which the company agree will not go ahead without the consent of all the shareholders; these reserved matters will be dealt with by the Shareholder Committee or Executive, where Executive has retained responsibility for specific matters, as set out in paragraph 3.3 above). This agreement involves the company agreeing to limit their authority to take decisions without input from the company's owners.
- 4.3 It is expected that each housing company will enter into a form of agreement with the Council (whether as owner, controller or lender) setting out the basis of the relationship between them.
- 4.4 Delegated authority is sought in this report to agree the final terms of Memorandum of Agreement (MOA). Some of the key terms of this are broadly summarised below:

a) **Business/Conduct of the Company:** provides that the Business of the company (including its objectives) will be as set out in the Business Plans as approved by the Council and that the company will carry out its business in accordance with the MOA, the Business Plans and other parameters agreed with the Council

b) **The Board:** will set out broadly how the Board will operate on a day-to-day basis. The Council (as Shareholder) will have the power to appoint and remove members of the Board in all of its companies

c) **Policies:** various policies will be required in order for the operation of the company to be effective; for example where there are potential conflicts of interest a policy can be adopted to provide clarity; the shareholder will also include a requirement for adoption of a remuneration policy;

d) **Council Reserve Power:** as well as the specific matters which are always reserved to the Council to decide and which will be set out in a schedule to the MOA, the MOA gives a general power to the Council (as Shareholder Committee) to direct the Board to take action or refrain from taking any action

e) **Scheme of Delegation:** sets out how decisions will be made. This will be a separate schedule setting out which decisions will be reserved to the Council as Shareholder and which by the company's Board (and which by the company's management, if applicable)

f) **Business Plans:** requires the company to be run and financed in accordance with the Business Plan and sets out how they will be prepared, approved and updated. Each MOA will describe the Business Plan which are to be produced by the company, which will vary depending on the nature of the subsidiary. The MOU will also refer to how performance will be monitored against Business Plans with key trigger events which will require a review of the relevant Business Plan.

4.5 Further information on the hierarchy of housing company meetings is provided at Appendix 2 as per the request of Scrutiny.

**FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

*The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.*

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	£0	Yes	Revenue
Next Financial Year (Year 2)	£0	Yes	Revenue
Following Financial Year (Year 3)	£0	Yes	Revenue

<b>Other Financial Information</b>
The proposals set out in this report seek to strengthen and consolidate the financial monitoring undertaken in terms of the Council’s housing companies. Key financial monitoring information will be brought together for the Shareholder Committee. This will provide a regular snapshot of the financial performance of each housing company and the group to support wider decision making. It will also help to raise early concerns about the financial position of any of the subsidiary housing company and where necessary discuss and agree appropriate actions.

<b>Legal Implications arising from the Recommendation(s)</b>
<p>The proposal to set up a Shareholder Committee, the Terms of Reference as set out, and the ancillary arrangements outlined in this report will ensure that the Council not only acts lawfully but also that current guidance and good practice recommendations are followed. The proposals will ensure improved governance of housing companies or bodies set up by the Council.</p> <p>The Executive can delegate its functions to a Committee via paragraph 5.4.1.1(a) and to Executive Members and Officers via sub-paragraphs (c) and (d) respectively.</p> <p>Paragraph 5.2.6.17 will have to be deleted / amended to reflect the change in relationship of the Leader to the Companies, and the Constitution amended to reflect the creation of the Committee and its functions and responsibilities, most likely by an addition to 5.7</p>

<b>Stakeholder Considerations and Consultation</b>
No public consultation is required for this decision.

<b>Public Sector Equality Duty</b>

An equalities assessment is not required for this decision.

**Climate Emergency – This Council has declared a climate emergency and is committed to playing as full a role as possible – leading by example as well as by exhortation – in achieving a carbon neutral Wokingham Borough by 2030**

There are no specific implications of this decision relating to the Borough achieving carbon neutrality.

**Reasons for considering the report in Closed Session**

Not applicable.

**List of Background Papers**

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## APPENDIX 1

To be incorporated in Section 5.7 of the Constitution

# DRAFT

## WOKINGHAM BOROUGH COUNCIL

### SHAREHOLDER COMMITTEE

### TERMS OF REFERENCE

## 1. OVERVIEW

- 1.1 The Shareholder Committee forms part of the overall governance arrangements for Wokingham Borough Council ("**the Council**") in relation to housing companies and other legal entities which are wholly or partly owned or controlled by the Council (including where such control comes about indirectly, such as via a loan agreement) (each a "Subsidiary" and together the "Subsidiaries").

## 2. MEMBERSHIP

- 2.1 The voting members of the Shareholder Committee will be set to 4 Executive Councillors consisting of:
- 2.1.1 the Leader (as Chair).
  - 2.1.2 Deputy Leader.
  - 2.1.3 Executive Member for Business & Economic Development; and
  - 2.1.4 Executive Member for Finance
- 2.2 Each Shareholder Committee member may nominate an alternate Executive Member to attend a meeting in their place.
- 2.3 An opposition member will be invited to join the Committee as a non-voting member. The main opposition group leader will be invited to nominate their opposition member of the Committee. If the nominated opposition member is unable to attend a meeting of the Committee, they may appoint a substitute member to act in their place at the meeting. The appointment shall only take effect if the Member making the appointment, or in the Member's absence their Group Leader or Political Assistant, notifies the Head of Democratic & Electoral, or their representative, no later than midday of the day of the meeting that they will be unable to attend the meeting and the name of the appointed substitute Member.

- 2.4 The Shareholder Committee will be supported by Council officers as required.
- 2.5 The Shareholder Committee will appoint the Leader as Chair of the Shareholder Committee. If the Chair is not present at the start of a meeting of the Shareholder Committee, those members present will appoint one of the members present to chair that meeting.
- 2.6 Additional advisors, who do not need to be officers or members of the Council, may be invited to attend the Shareholder Committee as required.

### **3. ROLE OF THE SHAREHOLDER COMMITTEE**

- 3.1 The Shareholder Committee will have a role in ensuring proper governance of the Council's housing companies, such role to include:
  - 3.1.1 monitoring information from each Subsidiary, in particular on financial and other risks and escalating such risks within the Council as appropriate.
  - 3.1.2 exercising decisions relating to the Council's role as shareholder, member, owner, lender, or other position of significant control over the Subsidiary, where those decisions have been delegated to the Shareholder Committee; and
  - 3.1.3 making reports and recommendations to the Executive on areas outside of the Shareholder Committee's delegated authority.
- 3.2 It is expected that each housing company will enter into a form of agreement with the Council (whether as owner, controller or lender) setting out the basis of the relationship between them (each a "Memorandum of Agreement").
- 3.3 A detailed description of the Shareholder Committee's role in relation to each housing company will be set out in the relevant Memorandum of Agreement.
- 3.4 Authority to make decisions on behalf of the Council is delegated to the Shareholder Committee for each housing company as follows:
  - Altering in any respect the articles of association of a Subsidiary
  - Altering the rights attaching to any of the shares in a Subsidiary
  - Permitting the registration of any person as a shareholder or member of a Subsidiary
  - Nominating directors to be appointed on the board of a Subsidiary and notifying a Subsidiary to remove directors from its board
  - Increasing the amount of a Subsidiary's issued share capital

- Altering the name of any Subsidiary
- Adopting, reviewing or amending a Subsidiary's Business Plan Where a Subsidiary fails to produce a Business Plan as required by its Memorandum of Agreement, producing that Subsidiary's Business Plan
- Directing the board of a Subsidiary to take or to refrain from taking a particular action

3.5 Any Memorandum of Agreement entered into with a housing company may identify additional decisions which are delegated by Executive to the Shareholder Committee in relation to that Subsidiary only.

3.6 Decisions which are not delegated to the Shareholder Committee in accordance with 3.4 above will be taken through the usual decision-making processes in accordance with the Council's governance and constitutional framework. This will include decisions relating to the issue of loan capital in relation to any Subsidiary and to any approvals relating to any intra-group loans.

#### **4. OPERATION OF THE SHAREHOLDER COMMITTEE**

4.1 The Shareholder Committee will meet three times per year, or more frequently if required.

4.2 The quorum for a meeting of the Shareholder Committee is a minimum of 3 members.

4.3 Meetings will be held in public or otherwise in line with the Council's democratic meeting protocol. There may be particular matters or agenda items which are required to be considered in private due to commercial confidentiality, and these will be handled in accordance with the Council's usual democratic protocol.

4.4 Minutes and agendas will be managed and published in accordance with the Council's usual democratic protocol.

4.5 The Shareholder Committee shall make its decisions as follows:

4.5.1 At meetings of its members by consensus of those present, unless any member of the Shareholder Committee requires a vote, in which event a majority decision will be taken with each member of the Shareholder Committee present having a single vote. Advisors and officers present to support the Shareholder Committee will not have a vote. The Chair of the meeting has a casting vote in the event that there is no clear majority; or

- 4.5.2 In cases of urgency, by a decision made by the Leader or by an alternate Executive Member nominated by the Leader.
- 4.6 After each meeting, the Chair shall approve the minutes and authorise the implementation of the Shareholder Committee's decisions, including where relevant the signature of any documents by appropriate Council signatories.
- 4.7 The Shareholder Committee will review the Terms of Reference annually and make any necessary recommendations to Executive.

## Appendix 2

### Local Housing Companies – Hierarchy of Meetings

Meeting	Frequency	Record
WBC (Holdings) Company comprising Executive Directors, Deputy Chief Executive and Director of Resources and Assets, Director of Place & Growth, WBC Solicitor with MD, Head of Finance (LHC's)	Bi-monthly	Minuted
Loddon Homes Board comprising Exec. & Non-Exec Directors, MD, Head of Finance and Head of Operations (LHC's)	Bi-monthly	Minuted
Berry Brook Board comprising Exec & Non-Exec. Directors, MD, Head of Finance and Head of Operations (LHC's)	Bi-monthly	Minuted
Common Purpose Boards comprising Exec. & Non-Exec Directors, MD, Head of Finance and Head of Operations (LHC's)	Bi-monthly	Minuted
Audit and Risk Committee comprising 1no. Exec. Director and 2no. Non-Exec. Directors, Head of Operations, Head of Finance and Management Accountant (LHC's)	Quarterly	Minuted
Strategic Officer Group comprising Deputy Chief Executive and Director of Resources and Assets, Director of Place & Growth, Assistant Director of Economy & Housing, Assistant Director Finance with MD (LHC's)	Monthly	Action notes taken
Commissioning Group comprising Assistant Director Economy & Housing, Head of Strategic Housing, Senior Development Officers (WBC), MD, Head of Operations and Head of Finance (LHC's)	Monthly	Action notes taken

Finance Operations comprising Assistant Director Finance, Chief Accountant and MD (LHC's)	Monthly	Action notes taken
'Silver' Accommodation Group comprising Director ACS, Director of P&G, Strategic Commissioners ACS, Procurement, Commercial Property, Accountants, Housing Strategists, MD (LHC)	Fortnightly	Minuted
MD & Head of Operations (LHC's) 121	Weekly	Action notes taken
MD & Head of Finance (LHC's) 121	Weekly	Action notes taken
LHC's Leadership Team comprising MD, Head of Operation & Head of Finance (LHC's)	Fortnightly	Action notes taken
Development Project Team comprising MD, Head of Finance & Head of Operations (LHC's) with Commercial Property WBC	Bi-weekly	Action notes taken
Financial Modelling Project Team comprising Chief Accountant, Head of Finance (LHC's) and external consultant advising	Bi-weekly	Action notes taken
Director of Place and Growth & Managing Director (LHC's) 121	Monthly	Action notes taken
WBC Asset Team meeting, Head of operations, service improvement officer (LHC)	Monthly	Minuted
Head of Operations LHC's & Head of Operational Housing (WBC) 121	Bi-Monthly	Action notes taken