

Place Shaping Panel

Agenda

Members of the Place Shaping Panel

Mr I N Moncur
(Chairman)

Mr G Everett
Mr R R Foulger
Miss S Lawn
Mrs J Leggett
Mr G K Nurden
Mr F O'Neill
Mr S Riley
Mr D B Willmott

Date

Tuesday 9 October 2018

Time

6.00 pm

Place

Council Chamber
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich

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If any Member wishes to clarify details relating to any matter on the agenda they are requested to contact the relevant Head of Service.

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**The Chairman will ask if anyone wishes to
film / record this meeting**

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1	To receive declarations of interest under Procedural Rule no 8	
2	Apologies for absence	
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4	Matters arising therefrom (if any)	
5	<u>West Broadland Green infrastructure Project Plan</u>	7 – 74
6	<u>Response to Consultation on the Housing Green Paper – A new deal for social housing</u>	75 – 190
7	<u>The National Planning Policy Framework and the Greater Norwich Local Plan</u>	191 – 198
8	Exclusion of the press and public The Chairman will move that the press and public be excluded from the meeting for the remaining items of business because otherwise, information which is exempt information by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended by The Local Government (Access to Information) (Variation) Order 2006, would be disclosed to them.	
9	<u>Proposal for a Joint Strategic Housing Statement for Broadland and South Norfolk</u>	199 – 207

P C Kirby
Chief Executive

Minutes of a meeting of the **Place Shaping Panel** held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on **Thursday 3 May 2018** at **6.00 pm** when there were present:

Mr S A Vincent – Chairman

Mr R R Foulger

Mrs J Leggett

Mr I N Moncur

Mr S Riley

Mrs Bannock, Mr Grady, Mr Knowles and Mr Leggett also attended the meeting for its duration.

Also in attendance were the Spatial Planning Manager and Committee Officer (JO).

24 DECLARATIONS OF INTEREST UNDER PROCEDURAL RULE NO 8

The Chairman advised the meeting that through his consultancy Abzag, he was promoting, on behalf of the landowner, a site for residential development in Colney through the Greater Norwich Local Plan. When this site was under consideration, he would declare a disclosable pecuniary interest and shall vacate the chair and leave the room.

In the interests of transparency, he also brought to the Board's attention, that his father, Malcolm Vincent, through his company Vincent Howes, was promoting, on behalf of the landowners, a site for residential development in Costessey/Bawburgh through the Greater Norwich Local Plan (GNLP).

In this case, under the provisions of the Code of Conduct, there was no interest to declare which would prevent him from participating in the debate and chairing the meeting.

He added that he would be declaring the same interests when as a Member of Cabinet and Council, GNLP matters were considered.

25 APOLOGIES FOR ABSENCE

Apologies for absence were received from Mr Everett, Mrs Hempsall and Mr O'Neill.

26 MINUTES

The Minutes of the meeting held on 13 March 2018 were confirmed as a correct record and signed by the Chairman.

27 RESPONSE TO CONSULTATIONS ON DRAFT REVISED NATIONAL PLANNING POLICY FRAMEWORK AND GOVERNMENT STATEMENT ON 'SUPPORTING HOUSING DELIVERY THROUGH DEVELOPER CONTRIBUTIONS'

The report set out proposed responses to the Government's consultations on a draft revised National Planning Policy Framework, (NPPF) and the statement on Supporting Housing Delivery through Developer Contributions.

Both consultation responses had been produced under the Greater Norwich Development Partnership with additional input from South Norfolk and Broadland Officers. Members were advised that the responses from the other Greater Norwich planning authorities might differ.

The NPPF was being revised as the current Framework had been affected by a number of Ministerial Statements and legal decisions since it was published in March 2012. The new draft NPPF had substantial changes to the layout of the document, which made it easier to read, but it did not have significant changes to the content. It did, however, incorporate policy proposals previously consulted on in the 2017 Housing White Paper and Planning for the Right Homes in the Right Places consultations.

Key elements of the Framework were:

- Strategic and local plans should be reviewed at least every five years and to ensure they were 'an appropriate strategy' not 'the most appropriate strategy' (this would make local plans more robust if challenged);
- Twenty percent of allocated sites should be a half hectare or less;
- No affordable housing on sites with fewer than ten units;
- Ten percent of affordable home ownership properties would be required on major sites.

Members were informed that the five-year land supply requirement remained, but that a greater emphasis was now being placed on delivery. This would be measured by a Housing Delivery Test, which would be calculated on an annual basis for each planning authority and published by the Secretary of State. If the test indicated that delivery had fallen below 95 percent of the housing need in the District over the previous three years an Action Plan would be required to assess the causes and identify actions to increase delivery in future years. If housing delivery were less than 75 percent of the identified need there would be a presumption in favour of any development in a sustainable area. A Member noted that this could allow developers to delay

construction in some areas, so that they could take advantage of opportunities to secure planning permission elsewhere.

The draft NPPF would also require Statements of Common Ground to be produced, which confirmed that effective joint working on cross boundary matters was being addressed, as required under the Duty to Cooperate.

The Panel was advised that the draft NPPF was unlikely to have any further significant changes made to it before it came into force during the summer.

The second consultation was on the Government Statement on Supporting Housing Delivery through Developer Contributions, which aimed to make the system of developer contributions more transparent and accountable by reducing complexity and increasing certainty. This was intended to support swifter development and increase market responsiveness to changes in land values.

The Statement proposed a simplified Community Infrastructure Levy (CIL) production process, as well as the scrapping of S106 pooling restrictions in CIL areas. Changes were also proposed for CIL charging schedules, which would allow local authorities to take account of the existing use and increased value land following the granting planning permission.

The Panel was informed that some amendments had been made to both consultation responses, since the Agenda had been published; with both consultation responses now included the following comment for clarification:

Broadland District Council is a member of the Greater Norwich Development Partnership, which also includes South Norfolk Council, Norwich City Council, Norfolk County Council and the Broads Authority, and the responses make reference to this Partnership. This is not a composite response on behalf of the Partnership and individual members may submit separate and alternative responses from their perspective, in particular the County Council response will reflect its wider strategic role.

The NPPF consultation also included the following response to question 35, which referred to habitats and biodiversity:

Also, to be correct, in paragraph 172 reference should be made in criteria (a) and (b) to geodiversity as well as biodiversity.

The consultation response to Supporting Housing Delivery through Developer Contributions now included the following additional comment in respect of Question 24, which referred to improving transparency and increasing accountability:

The Council very much welcomes the increased flexibility that removing the restrictions in regulation 123 would give to CIL authorities seeking to meet the infrastructure needs of their area. Such needs can change rapidly and can be best successfully addressed by using finance from a number of different sources. We are aware that this proposal has given rise to some concerns from industry and infrastructure providers but would suggest that arrangements that exist in organisations such as Greater Norwich Growth Board, where CIL revenues are pooled and used to fund a shared infrastructure need across a wide area which are agreed not only by the local three District/City Councils but also the County Council and the Local Enterprise Partnership. We consider that these procedures should be sufficient to address the concerns raised so would request that even if the Government does not press ahead with the proposal to remove the restrictions in regulation 123 it does find a way to give the proposed flexibility to authorities such as those within the GNGB who are working co-operatively across boundaries and different tiers of government to prioritise infrastructure spending in order to maximise delivery.

NB: Norfolk County Council (a member of the GNDP Partnership) have submitted an alternative response on this question reflecting their role as a key infrastructure provider.

The Panel noted and commended the responses the consultations

The meeting closed at 6.47 pm.

WEST BROADLAND GREEN INFRASTRUCTURE PROJECT PLAN

Portfolio Holder: Planning

Wards Affected: Aylsham; Drayton North; Drayton South; Great Witchingham; Hellesdon North West; Hellesdon South East; Hevingham; Horsford & Felthorpe; Reepham; Taverham North; Taverham South

1 SUMMARY

- 1.1 A Green Infrastructure Project Plan has been developed for the western area of Broadland District, to complement a similar Plan that was produced for the east of the District in 2015.
- 1.2 The Project Plan identifies opportunities to enhance and develop 'green infrastructure' (e.g. woodlands, footpaths, informal open spaces) in this part of the district, for the benefit of residents and wildlife.
- 1.3 Although funding for these projects may not be readily available at present, the Project Plan has been prepared so that when suitable financial resources do become available in the future (e.g. through the planning process), they can be directed towards appropriate, local green infrastructure enhancements.

2 KEY DECISION

- 2.1 This is not a key decision and has not been published in the Forward Plan.

3 BACKGROUND

- 3.1 Housing growth within Broadland provides opportunities for green infrastructure (GI) enhancements which will cater for the informal recreation requirements of new and existing populations and the migratory and habitat requirements of local wildlife. It will also help to mitigate any negative impacts on particularly sensitive environmental assets within the area (principally those that have been designated under European legislation).
- 3.2 In 2015, an 'East Broadland Green Infrastructure Project Plan' was produced for Broadland District Council by Norfolk County Council's Natural Environment Team, which had been commissioned to undertake this work. The aim of this Plan was to provide Broadland District Council and other key stakeholders with an action Plan to guide potential, local GI enhancement projects in the east Broadland area.

- 3.3 Following the production of the East Broadland GI Project Plan, the original ambition was for the Natural Environment Team at Norfolk County Council to produce a similar Plan for the west of the District. However, Broadland District Council was subsequently advised that the Team did not have the capacity at that time. This led to the West Broadland GI Project Plan being produced by officers within the Spatial Planning Team.
- 3.4 The West Broadland GI Project Plan (see Appendix 1) has similar aims and makes recommendations for GI projects that will help to deal with the impacts of development within the area and which will improve GI connectivity at a broader, more strategic level.
- 3.5 The delivery of these projects will help to mitigate the impact of future growth of the area on the natural environment. It is anticipated that their delivery will reduce the number of residents travelling further afield to access recreational opportunities, particularly visits to highly sensitive wildlife sites which are designated for protection under European legislation (e.g. River Wensum, the Broads, North Norfolk Coast).
- 3.6 In addition, the health and wellbeing benefits of outdoor recreation opportunities have been much documented, and the projects within this Plan will (it is anticipated) have strong, positive effect on the health and wellbeing of the local population.
- 3.7 The Plan focuses on the area in the west of Broadland District, from the boundary with Norwich in the south and with Breckland District in the west, to parishes such as Reepham and Cawston in the north and Marsham, Hevingham and Hainford in the east.
- 3.8 The basis for this study area, in GI terms, is the Marriott's Way Primary GI corridor (which runs from Norwich out towards Reepham and Aylsham, via Drayton, Taverham, Lenwade etc) and the various secondary corridors that branch off from the Marriott's Way, linking the various villages and countryside, as identified within the Green Infrastructure Strategy 2008, commissioned by the Greater Norwich Development Partnership.

4 THE ISSUES

- 4.1 The first stage in identifying potential projects involved desk-based research and mapping of existing green infrastructure in the area using Geographic Information System (GIS). Research involved examining relevant strategies, plans and guidance for particular policies and proposals that are likely to have implications for green infrastructure in the area.
- 4.2 Mapping the existing green infrastructure in the area, such as sites with local, national and international designations, current public rights of way and areas of common land, helped to identify opportunities for making green

connections and enhancements to particular areas, particularly around settlements where future housing growth is expected.

- 4.3 This work resulted in a long-list of project opportunities that had yet to be assessed via any stakeholder discussions or feasibility work. These projects were then prioritised, based on their strategic importance and deliverability.
- 4.4 The deliverability of a project has largely been determined by whether there are any land ownership or accessibility issues, and also whether the project area is located in or near to an area of housing growth. It is anticipated that the main source of funding for project delivery will be through developer contributions, in the form of CIL or Section 106 money.
- 4.5 In certain instances, site visits were required in order to ascertain the feasibility of what was being proposed in terms of access, condition of the site, proximity to settlements etc. This helped to refine project ideas in order to make them more achievable.
- 4.6 For each project, a number of key stakeholders were identified and discussions were held with a number of these organisations in order to gain their views on whether they would support the project, whether the project idea could be improved and whether they had suggestions for additional projects within the area. These stakeholders included landowners (where identifiable), parish / town councils, community trusts, statutory and public sector bodies etc. Projects were refined and amended on the basis of these discussions.
- 4.7 The draft Project Plan was subject to consultation with the identified stakeholders between 2 February and 19 March 2018, where 20 comments were made. A summary of these comments is available to view in Appendix 2. Several changes were made to the Plan, based on these comments, and the nature of these changes is set out in the Appendix.

5 DISCUSSION

- 5.1 The result of the process listed in section four is a list of ten specific GI enhancement projects within this area of the District, focusing either on the enhancement of specific, existing sites or the enhancement and development of particular GI corridors / 'greenways' throughout this area.
- 5.2 The majority of the projects are based within the proximity of significant areas of housing growth (e.g. Hellesdon, Drayton, Horsford), to maximise opportunities for their deliverability through funding, but also because these are areas where the pressure for increased recreation opportunities and environmental protection will be at their greatest due to significant increases in future resident population.

- 5.3 However, there are projects listed that focus on existing sites further away from the Norwich Policy Area (e.g. Hevingham Park; Great Wood, Haveringland), where opportunities for greater public access to these sites, to benefit and serve local village and town populations, would seem to be prevalent.
- 5.4 Although officers have tried to establish contact with as many of the relevant landowners within these project areas as possible, their efforts have not always proved fruitful. In some instances, land ownership has been difficult to ascertain. In other locations, where details have been found and where officers have tried to contact the relevant organisation or individual, there has been no reply.
- 5.5 In these cases, the view of officers is that the potential value of the project in question (which often crosses the land of several owners) justifies its inclusion in the GI Project Plan. The Plan itself exists to highlight project opportunities and provide a relatively broad, conceptual overview of how they could be delivered. The introduction to the Plan explains that 'further project development work will be required in each instance, as and when development opportunities arise'. This will include negotiations with landowners, as required.
- 5.6 As can be seen from Appendix 2, consultation responses on the draft Plan were received from:
- (1) BDC Tourism Officer
 - (2) Horsford Parish Council
 - (3) Norfolk Wildlife Trust
 - (4) Norfolk County Council
 - (5) CODE Development Planners (on behalf of Drayton Farms Ltd)
 - (6) Drayton Parish Council
 - (7) Hevingham Parish Council
 - (8) Felthorpe Parish Council
- 5.7 The majority of the comments received are, in general, supportive. Several responses suggest ways of improving the accuracy, clarity or effectiveness of the Plan and, in the main, these comments have led to amendments being made to the document. Where this is the case, this has been noted against the relevant comments in Appendix 2.

6 PROPOSED ACTION

- 6.1 In light of the Council's continued commitment to providing green infrastructure, through the requirements on development and working with communities, it is proposed that the Project Plan informs that work. The Place Shaping Panel is therefore asked to note and endorse the Project Plan.

7 RESOURCE IMPLICATIONS

- 7.1 Funding for any projects will come from planning permission contributions or Community Infrastructure Levy, perhaps in conjunction with other external funding sources. Officer time will be from within existing staff resources.

8 LEGAL IMPLICATIONS

- 8.1 None directly arising from this report.

9 CONCLUSION

- 9.1 The Place Shaping Panel is **RECOMMENDED** to endorse the Project Plan and, in the process, raise any issues for consideration by officers and the Portfolio Holder.

Phil Courtier
Head of Planning

Background Papers

None.

For further information on this report call Richard Squires, Senior Community Planning Officer on (01603) 430637 or e-mail richard.squires@broadland.gov.uk



West Broadland Green Infrastructure Project Plan



October 2018

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1. Introduction

What is 'green infrastructure'?

The term 'green infrastructure' can often be open to different interpretations. It is therefore considered necessary for this Project Plan to adopt a standard definition that best reflects the common understanding of the term by local planning authorities within the Greater Norwich area.

The Joint Core Strategy for Broadland, Norwich and South Norfolk (2014) defines 'green infrastructure' as:

Green spaces and interconnecting green corridors in urban areas, the countryside in and around towns and rural settlements, and in the wider countryside. It includes natural green spaces colonised by plants and animals and dominated by natural processes and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space, allotments, urban parks and designed historic landscapes as well as their many interconnections like footpaths, cycleways, green corridors and waterways.

As this is the standard definition of the term as it relates to the Broadland Development Plan, it is the definition adopted by this Project Plan.

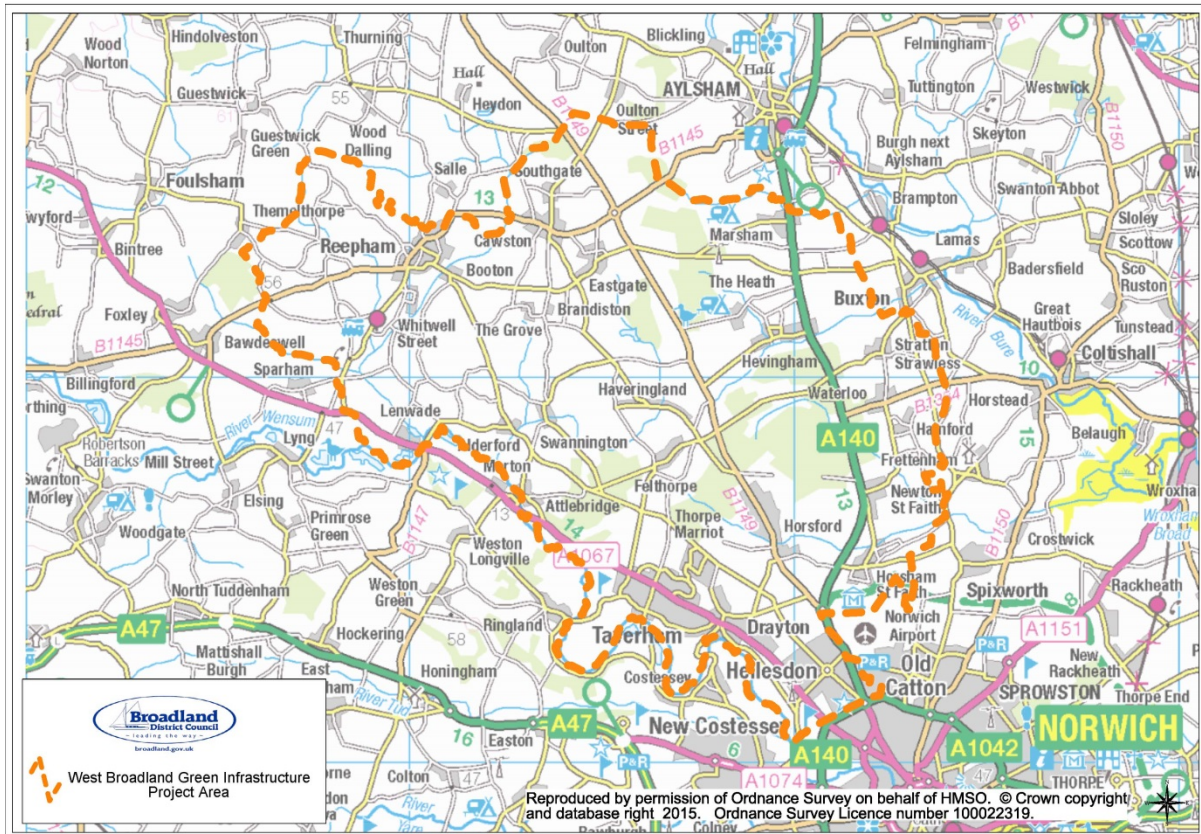
It is also the definition adopted by the East Broadland Green Infrastructure Project Plan, which was produced by Norfolk County Council Environment Team on behalf of Broadland District Council in December 2015.

Background

This Green Infrastructure (GI) Project Plan focuses on the area in the west of Broadland District, from the boundary with Norwich in the south and with Breckland District in the west, to parishes such as Reepham and Cawston in the north and Marsham, Hevingham and Hainford in the east.

The basis for this study area, in GI terms, is the Marriott's Way Primary GI corridor (which runs from Norwich out towards Reepham and Aylsham, via Drayton, Taverham, Lenwade etc.) and the various secondary corridors that branch off from the Marriott's Way, linking the various villages and countryside, as identified within the Green Infrastructure Strategy 2008, commissioned by the Greater Norwich Development Partnership.

In addition, the housing growth set out within the Joint Core Strategy (2014) for Broadland, Norwich and South Norfolk and Broadland District Council's Site Allocations Document (2015) has implications in this area of the district, particularly within the Norwich Policy Area (NPA - the urban fringe parishes and villages closest to the city). In addition to the current Development Plan, work has already commenced on the future Greater Norwich Local Plan and sites for housing development have been put forward for consideration all across Broadland, including within this study area. Whilst it is still too early to confirm which sites may become identified for development within the next Local Plan, there have already been and will continue to be a number of speculative planning applications in this and other areas of the district, particularly within the NPA.



West Broadland Green Infrastructure Project Plan study area

Housing growth within the district provides opportunities for green infrastructure enhancements which will cater for the informal recreation requirements of new and existing populations and the migratory and habitat requirements of local wildlife. It will also help to mitigate any negative impacts on particularly sensitive environmental assets within the area (principally those that have been designated under European legislation).

In addition, the health and wellbeing benefits of outdoor recreation opportunities have been much documented, and the projects within this plan will (it is anticipated) have strong, positive effect on the health and wellbeing of the local population.

This Project Plan makes recommendations for GI projects that will help to deal with the impacts of development within the area and which will improve GI connectivity at a broader, more strategic level.

An action plan, which summarises each of the projects within the document and which also includes estimates of costs and timescales, is included as Appendix 1 within this Plan. As noted elsewhere in the document, the purpose of the Plan is to highlight opportunities for positive GI interventions in this part of the district. Further project development work will be required in each instance, as and when development opportunities arise.

2. Aim and Objectives

Aim

To identify a series of green infrastructure project opportunities across the western area of Broadland District which will enhance local recreational opportunities for residents of the area and provide enhanced habitats and connectivity for local wildlife populations.

The delivery of these projects will help to mitigate the impact of future growth of the area on the natural environment. It is anticipated that their delivery will reduce the number of residents travelling further afield to access recreational opportunities, particularly visits to highly sensitive wildlife sites which are designated for protection under European legislation (e.g. River Wensum, the Broads, North Norfolk Coast).

Objectives

1. Establish new, accessible green spaces at a local level, for the benefit of local residents and wildlife.
2. Enhance existing local green spaces, in terms of their recreational offer and their biodiversity value.
3. Enhance connectivity between green spaces and settlements by establishing and enhancing green corridors.
4. Contribute to the development of the network of strategic, secondary green corridors that branch off from the Marriott's Way Primary GI Corridor.
5. Reduce visitor pressure on regional, European-designated sites by providing attractive, local recreation opportunities.

3. Review of Existing Plans, Strategies and Guidance

There are a number of existing plans, strategies and guidance at differing levels which set out guidance and policies relating to local green infrastructure. The key documents are summarised in the table below.

No.	Geographic scale	Title	Date	Author
1	National	'Nature Nearby' – Accessible Natural Greenspace Guidance	2010	Natural England
2	Sub-regional	Green Infrastructure Strategy	2008	Greater Norwich Development Partnership
3		Joint Core Strategy	2014	Greater Norwich Development Partnership
4		Greater Norwich Infrastructure Plan	2016	Greater Norwich Growth Board
5		Marriott's Way Improvement and Delivery Plan 2015-2025	2015	Norfolk County Council
6	District	Development Management DPD	2015	Broadland District Council
7		Site Allocations DPD	2016	Broadland District Council
8		Landscape Character Assessment SPD	2013	Broadland District Council
9	Parish	Drayton Neighbourhood Plan	2016	Drayton Parish Council
10		Hellesdon Neighbourhood Plan	2017	Hellesdon Parish Council
11		Horsford Neighbourhood Plan	2018	Horsford Parish Council

The following presents a more detailed summary of each of these documents and, in particular (and where relevant) sets out any implications for green infrastructure within the study area of this project plan.

National

i) 'Nature Nearby' – Accessible Natural Greenspace Guidance (Natural England, 2010)

This guidance aims to foster accessible, good quality, natural green space which is close to where people live. It is aimed at parks and green space practitioners and their partners, particularly decision-makers, planners and managers of green space.

The guidance proposes the adoption of three key standards in planning and delivering green space. These are the:

- a. Access to Natural Greenspace Standard (ANGSt)
- b. Visitor Service Standards
- c. Greenspace Quality Standard

ANGSt is an effective standard for assessing current levels of accessible, natural green space and planning for better provision. It sets a range of accessibility standards for natural sites and areas within easy reach of people's homes. A broad view is taken on what is termed 'natural'.

It recommends that everyone, wherever they live, should have an accessible natural green space:

- of at least 2 hectares in size, no more than 300 metres (5 mins walk) from home;
- at least one accessible 20 hectare site within 2km of home;
- one accessible 100 hectare site within 5km of home;
- one accessible 500 hectare site within 10km of home;
- a minimum of 1 hectare of statutory Local Nature Reserves per thousand population.

Natural England has developed visitor service standards for National Nature Reserves, Country Parks and Local Nature Reserves. The standards cover a range of core facilities and services that visitors should expect to find at each type of site. There are currently none of these designations within the study area of this project plan.

The Greenspace Quality Standard (Green Flag Award) is an award that is given to green spaces that demonstrate they meet certain key criteria. It provides visitors with an assurance of quality and can also help to assess whether the right intensity of management is matched to site requirements. Criteria include whether the site is a welcoming place, whether it is healthy, safe and secure, clean and well-maintained etc.

Sub-regional

ii) Green Infrastructure Strategy (Greater Norwich Development Partnership, 2008)

The Green Infrastructure Strategy is a study commissioned by the Greater Norwich Development Partnership (GNDP) in 2008 in order to establish a strategy for green infrastructure that would complement and support good quality housing and substantial economic growth, as set out within the Joint Core Strategy (2014). The Strategy was prepared by Chris Blandford Associates.

The Strategy promotes a multi-functional network of green spaces and green links which connects Norwich, other settlements and the countryside via green corridors, providing sustainable opportunities for communities to access and enjoy a variety of green spaces on their doorstep and in the wider countryside. The network also connects a diverse range of wildlife habitats and provides important ecological corridors for species dispersal and migration.

The Strategy defines a series of Sub-Regional (Primary) Green Infrastructure Corridors within which it is recommended that investment in new and enhanced green infrastructure provision be prioritised. The study area for this Project Plan includes the **Norwich-Reepham-Aylsham Corridor** (i.e. the Marriott's Way) which runs north west from the city, out to Reepham, before curling to the east to link up with Aylsham.

The study area also includes sections of the **Northern Greater Norwich Area Local Green Infrastructure Corridor Network**. The study identifies Local (Secondary) Green Infrastructure Corridors which link up with the Primary Corridors to create the overall green infrastructure network. The Secondary Corridors provide linkages between Primary Corridors, and between Primary Corridors and settlements. The sections of Secondary Corridor within this study area include those between:

- Thorpe Marriott and Hevingham;
- Lenwade and Hevingham;
- Haveringland and Cawston;
- Marsham and Aylsham;
- Buxton Heath and Aylsham.

The map in Appendix 3 sets out the broad routes of Primary and Secondary Green Infrastructure Corridors within the project plan study area.

In addition to the Green Infrastructure Strategy, a Green Infrastructure Delivery Plan was produced by the Landscape Partnership, on behalf of the GNDP, in August 2009. This plan focused on the major growth areas within the Norwich Policy Area (south west and north east Norwich), as identified by the emerging Joint Core Strategy, and sought to prioritise green infrastructure projects for delivery in these areas.

iii) Joint Core Strategy (Greater Norwich Development Partnership, 2014)

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was fully adopted in January 2014. The JCS sets out the long term spatial vision and objectives for the area, including strategic policies for steering and shaping development. It identifies broad locations for new housing and employment growth and changes to transport infrastructure and other supporting community facilities, as well as defining areas where development should be limited.

Policy 1 of the JCS focuses on addressing climate change and protecting environmental assets. This policy acknowledges the recommendations of the Green Infrastructure Strategy and states that *'in areas not protected through international or national designations, development will (...) contribute to providing a multifunctional green infrastructure network, including provision of areas of open space, wildlife resources and links between them, both off site and as an integral part of the development.'* The JCS incorporates the Green Infrastructure Network plan, developed as part of the

Green Infrastructure Strategy, and states that this has been identified to inform more detailed policies elsewhere in Local Plan documents.

The JCS includes a settlement hierarchy that sets out the distribution of growth between settlements in the Greater Norwich area. Within the study area of this Project Plan, the following settlements have land identified for development (up to 2026) under the JCS:

- Sites within the Broadland Norwich Policy Area (NPA), including fringe parishes such as Hellesdon, Drayton and Taverham
- Reepham
- Horsford
- Horsham & Newton St Faith
- Lenwade
- Cawston

For further information on the location and scale of development in each of these locations, please refer to item 7, 'Site Allocations DPD 2016', below.

Since its adoption the JCS now forms the overarching document in the Broadland Development Plan.

iv) Greater Norwich Infrastructure Plan (Greater Norwich Growth Board, 2016)

The Greater Norwich Infrastructure Plan (GNIP) helps to coordinate and manage the delivery of strategic infrastructure to support growth, a high quality of life and an enhanced natural environment. It informs the prioritisation of investment and delivery of this infrastructure and is not an exhaustive list. The GNIP is updated annually to reflect the latest information.

The GNIP supports the delivery of the JCS, other Local Plan documents for the area, local economic strategies, the Greater Norwich City Deal, and the Strategic Economic Plan (produced by the New Anglia Local Economic Partnership).

The following green infrastructure projects are already identified within the GNIP, relating to the study area of this project plan:

GI Priority Area	GNIP Ref.	Project
Marriott's Way / Wensum improvements	N/A	- Thorpe Marriott to Costessey
		- Surfacing works (Tesco)
		- Biodiversity management with community engagement
		- Crossing points improvement project
		- Signage to link Marriott's Way to adjacent communities
		- Reepham surfacing and biodiversity
		- Crossing over Taverham Rd, Drayton
GNGB Secondary Corridors		- Walking and cycling link to the Red Pedalways Route from the Royal Norwich Golf Club Development – Feasibility Plan
	S2	- Lenwade to Hevingham Secondary Corridor
	S3	- Haverlingland to Cawston Secondary Corridor
	S4	- Broadland east-west Secondary Corridor via Marsham

	S5	- Buxton Heath to Aylsham Secondary Corridor
	S6	- Hevingham to Thorpe Marriott Secondary Corridor
North West Forest and Heath	P8.1	- North West Norwich Forest Connections including Drayton and Thorpe Marriott

v) Marriott's Way Improvement and Delivery Plan 2015-2025 (Norfolk County Council, 2015)

This plan identifies potential projects that will improve the Marriott's Way trail over the next ten years, and prioritises these projects so as to maximise the benefits to be gained from the funding available.

The trail, which runs from Norwich to Aylsham, via Reepham, is entirely in public ownership. The majority is owned and managed by Norfolk County Council, with smaller sections owned and managed by Broadland District Council and Norwich City Council.

Broadland District Council, Norfolk County Council, Norwich City Council and South Norfolk Council are all working closely together to improve the trail as a route for walkers, cyclists and horse riders, and as an important wildlife corridor. As discussed under item 2 (Green Infrastructure Strategy), the Marriott's Way forms the basis for one of the Primary Green Infrastructure Corridors identified by this strategy which was commissioned by the Greater Norwich Development Partnership in 2008.

The Improvement and Delivery Plan sets out a series of aims for the trail, grouped under the themes of:

- Commuting
- Leisure
- Community Involvement
- Trees, Biodiversity and Landscape
- Heritage
- Access for All

It also sets out management arrangements, the status of funding (as at 2015/16), the results of a comprehensive survey of the state of the trail and of public consultation relating to use of the trail. The plan culminates in an extensive list of potential projects that will help to address the aims set out earlier in the document.

Projects identified for delivery have been highlighted within the Greater Norwich Infrastructure Plan 2016, several of which are located within the study area of this project plan (see item 4).

Of particular note for this Project Plan is the potential improvement project which seeks to:

'Create and promote new circular walks that use Marriott's Way for part of their length. Ideally, these should be connected to a car park. If possible, there could be more than one circular walk sharing the same 'hub' so users can do a longer walk if they wish to.'

District

vi) Development Management DPD 2015

Broadland District Council's Development Management DPD was adopted in 2015. It forms part of the Development Plan for Broadland and sets out detailed local policies for the management of development throughout the local planning authority area. It is aimed at guiding decision makers and applicants in order to achieve high standards of development which complement the valued attributes of the district.

Policy EN3 of the Development Management DPD focuses on Green Infrastructure. It states that all development will be expected to maximise opportunities for the creation of a well-managed network of wildlife habitats. It goes on to state that residential development consisting of five dwellings or more will be expected to provide at least 4ha of informal open space per 1,000 population and at least 0.16ha of allotments per 1,000 population. Development will also be expected to make adequate arrangements for the management and maintenance of green infrastructure.

In addition, Policy EN1 – Biodiversity and Habitats, states that development proposals will be expected to support the delivery of a co-ordinated green infrastructure network throughout the district. Policy EN2 – Landscape, states that development proposals should consider any impact upon as well as seek to protect and enhance, where appropriate, a range of natural and man-made landscape features. These include features relevant to green infrastructure such as gaps between settlements, historic parks and gardens and other green spaces.

The Policies Map accompanying the Development Management DPD sets out designated sites across the district that fall within the requirements of Policies EN1 and EN2. These comprise internationally, nationally and locally designated areas of biodiversity importance (EN1) and locally designated landscape features such as Local Green Space, Historic Parkland and Commons (EN2). The Policies Map can be viewed at <https://www.broadland.gov.uk/dmdpd>.

vii) Site Allocations DPD 2016

The Site Allocations Development Plan Document (DPD) was adopted as part of Broadland's Development Plan in 2016. It allocates areas of land for specific types of development such as housing, employment, community facilities etc. The scale of development reflects the requirements set out in the JCS. It also includes the definition of development boundaries or 'settlement limits' for those places where some growth may take place. It excludes the major growth area known as the Old Catton-Sprowston-Rackheath-Thorpe St Andrew Growth Triangle, to the north east of Norwich, and it also excludes the Broads Authority Executive Area.

Settlements within the G.I. Plan study area which include allocations with green infrastructure requirements, as set out within the Site Allocations DPD, are shown in the following table.

Settlement	Allocation
Drayton	DRA1 – Land east of Cator Rd and north of Hall Lane (c.12.5ha). 200 dwellings, allotments and open space.
	DRA2 – Land east of School Rd, Drayton (c.0.8ha). 20 dwellings and/or retail, business or community uses. Adequate landscaping and green infrastructure to be provided.
Hellesdon	HEL1 – Land at Hospital Grounds, south west of Drayton Rd (c.14.7ha). Approx. 300 homes and employment uses. Adequate landscaping and green infrastructure to be provided. Recreational provision could be included on site.
	HEL2 – Land at Royal Norwich Golf Club, either side of Drayton Rd (c.48.1ha). Approx. 800-1,000 dwellings and open space.
	HEL3 – Land adjacent to existing burial ground, north east of St Mary's Church (c.1.3ha). Adequate landscaping and green infrastructure is required.
	HEL4 – Land north east of Reepham Rd (c.11.9ha). Recreational open space. Adequate landscaping and green infrastructure to be provided.
	HEL5 – Land east of Eversley Rd (c.2.7ha). Approx. 55 homes. Adequate landscaping and green infrastructure is to be provided. Recreational provision could be provided on site.
Taverham	TAV1 – Land at Fir Covert Rd (c.5.6ha). Supermarket, car parking with a petrol filling station, public house/restaurant, and a commercial unit. Landscaping required.
Horsford	HOR1 – Land at Pinelands, Holt Rd (c.2.6ha). 63 dwellings and employment use. Adequate landscaping and green infrastructure is to be provided.
	HOR2 – Land north of Mill Lane (c.5.4ha). 125 dwellings and open space.
Reepham	REP1 – Land off Broomhill Lane (c.8.2ha). Approx. 100-200 dwellings and community facilities (incl. cemetery land, recreational open space and a sports hall). Adequate landscaping and green infrastructure to be provided.
	REP2 – Land at the former station yard, Station Rd (c.2.8ha). Approx. 20 homes and employment use. Adequate landscaping and green infrastructure to be provided.
Lenwade Witchingham)	(Great GW11 – Land north of Hubbards Loke and west of Hall Walk (c.2.4ha). 27 dwellings and new village hall. Adequate landscaping and green infrastructure to be provided.
Cawston	CAW1 – Land to the west of the existing cemetery (approx. 0.2ha) is allocated for an extension to the existing burial ground. Adequate landscaping and green infrastructure to be provided.
Horsham & Newton St. Faith	HNF1 – Land east of Manor Rd, Newton St. Faith (approx. 2.5ha) is allocated for residential development. This will accommodate approximately 60 homes. Adequate landscaping and green infrastructure to be provided, with a particular emphasis on retaining and protecting existing

	<p>trees on site and considering wider views from surrounding area.</p> <p>HNF2 – Land east of the A140 and north of Norwich International Airport, Horsham St. Faith (approx. 35ha) is allocated for employment uses benefitting from an airport location. This will be to provide a full range of employment uses benefitting from a location close to the airport. Adequate landscaping and green infrastructure to be provided.</p> <p>HNF3 – Land at Abbey Farm Commercial, Horsham St. Faith (approx. 2.9ha) is allocated for employment uses. Adequate landscaping and green infrastructure to be provided.</p>
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The map which is included as Appendix 2 shows the location of the above allocations. A number of the sites already have planning permission and, on some, development has either commenced or has been completed.

viii) Landscape Character Assessment SPD (Broadland District Council, 2013)

In October 2007, Broadland District Council commissioned Chris Blandford Associates to undertake a Landscape Character Assessment of the District (excluding the Broads Authority Area). This Assessment serves as a baseline inventory to enable a better understanding of Broadland's landscapes, for monitoring change.

Broadland District Council adopted the Landscape Character Assessment as a Supplementary Planning Document in September 2013. The SPD is used to guide development control decisions.

The SPD defines 6 Character Types in Broadland and 16 Landscape Character Areas that fall within one of these Character Types. The document includes management strategies and objectives for each of the Character Types.

Landscape Character Types and Areas relevant to this project plan, and their respective management strategies and objectives, are set out in the table below.

Character Type	Character Area	Management Strategies and Objectives
River Valley	A1 - Wensum River Valley	<p>The overall strategy should be to conserve the predominantly rural character, strong pattern of riverside trees and patchwork of habitats within this Landscape Character Type. There are also opportunities for enhancement, through protection and management of woodland, wetland and grassland habitats.</p> <p>Specific management objectives are to:</p> <ul style="list-style-type: none"> • Seek to enhance the corridor of the River Wensum through creation of wetland habitats, such as wet meadows and wet woodland; • Seek to enhance the River Wensum valley sides through the creation and expansion of all types of grassland and woodland; especially mixed habitats of grassland, heath and scrub/woodland;

		<ul style="list-style-type: none"> • Seek strategies to minimise the risk of eutrophication of rivers and waterways as a result of run-off from adjacent agricultural farmland e.g. catchment sensitive farming techniques; • Seek strategies to create and manage urban fringe greenspace in areas that border the Norwich settlement fringe, as well as the maintenance and enhancement of green corridors through built up areas; • Seek opportunities for the enhancement of the Bure and associated tributary wetland habitats.
Woodland Heath Mosaic	B1 - Horsford Woodland Heath Mosaic	<p>The overall strategy for the Woodland Heath Mosaic should be to conserve and enhance the mature blocks of woodland and patches of remnant heathland, which have strong biodiversity value and are recognisable landscape features. There are also opportunities for restoration of hedgerow field boundaries and replacement mature hedgerow trees where these have been lost. Planting to enhance hedges should be appropriate to the specific local character of the Landscape Character Areas.</p> <p>Specific management objectives are to:</p> <ul style="list-style-type: none"> • Seek to conserve and enhance woodland, wood pasture and heathland and associated wetland habitats, which represent areas of high biodiversity importance with a wide range of habitats; • Conserve remnant areas of heathland and take opportunities to extend these; • Seek opportunities for the creation of larger areas of heathland; • Encourage sustainable woodland management of the varied woodlands using traditional techniques such as coppicing where appropriate to maintain historic and ecological interest; • Encourage new woodland edge planting of native deciduous broadleaved to reduce the visual and ecological impact of the coniferous plantations; • Encourage the use of native tree species in new planting, which reflects the underlying soil conditions and maintaining regional character; • Seek to conserve and enhance existing mature landscape structure and related high landscape and ecological value; • Seek to conserve remnant patches of heathland and fen within interior parts of the woodland, which are of high ecological value and contribute to a sense on time-depth within the landscape; • Seek to Buffer the SAC Valley Fen component units, Booton Common SSSI and Buxton Heath SSSI is also desirable.

Plateau Farmland	C1 - Foulsham and Reepham Plateau Farmland	<p>The overall strategy for Plateau Farmland should be to conserve existing hedgerows, field and hedgerow tree and enhance and restore where lost.</p> <p>The generally simple landscape pattern, with open views to adjacent Landscape Character Types should also be conserved. Planting to enhance hedges should be appropriate to the specific local character of the Landscape Character Areas.</p> <p>Specific Management Objectives are to:</p> <ul style="list-style-type: none"> • Seek opportunities for the creation of mixed habitats of grassland and scrub/woodland in the woodland core area; • Consider opportunities for providing buffering the River Wensum (SAC) from diffuse pollution inputs through catchment sensitive farming; • Seek to conserve the hedgerow network as a recognisable landscape feature and wildlife corridor and restore and enhance where gappy; • Seek to establish arable field margins as potential nest sites from ground nesting birds and habitats for small mammals.
Tributary Farmland	<p>D1 - Cawston Tributary Farmland</p> <p>D2 – Weston Green Tributary Farmland</p>	<p>The overall strategy for the Tributary Farmland Landscape Character Type should be to be to conserve and restore the hedgerow network; and conserve the tributary river corridors as important landscape and nature conservation features. Planting to enhance hedges should be appropriate to the specific local character of the Landscape Character Areas.</p> <p>Specific management objectives are to:</p> <ul style="list-style-type: none"> • Seek opportunities for the creation of all types of grassland and woodland, especially mixed habitats of grassland and scrub woodland; • Seek opportunities for connectivity with Hockering Wood (outside the District); • Seek opportunities for the enhancement and creation of wetland habitats, such as wet meadows and wet woodland; • Seek opportunities for buffering the Rivers Wensum, Bure and Tud, through catchment sensitive farming; • Conserve priority habitats of wood pasture and grassland (based on the existing parks at Salle, Heydon and Blickling); • Seek to conserve and enhance the landscape structure within the area, including blocks and copses of woodland, mature parkland trees and intact hedgerows; • Seek to conserve and enhance the mature landscape structure in central and eastern parts,

		including blocks of woodland, which contributes to a small-scale and intimate character.
Wooded Estatelands	E3 - Spixworth Wooded Estatelands	<p>The overall strategy for the Wooded Estatelands should be to conserve the relatively intricate pattern of woodland clumps and copses and historic halls, alongside the generally strong character and recognisable sense of place. Planting to enhance hedges should be appropriate to the specific local character of the Landscape Character Areas.</p> <p>Specific management objectives are to:</p> <ul style="list-style-type: none"> • Seek opportunities for the creation of woodland and wood pasture; • Seek opportunities to promote catchment sensitive farming; • Seek to conserve and restore declining hedgerows and field trees; • Seek opportunities for the management and creation of urban and urban fringe greenspace, as well as the maintenance and enhancement of green corridors through the built areas; • Seek to conserve and enhance the landscape structure within the area, including blocks and belts of woodland, copses of mature trees, mature parkland trees and intact hedgerows; • Conserve and enhance existing woodland belts to buffer potential new housing development; • Seek to retain and conserve parkland landscapes and character to provide green space between potential new housing development.

Parish

ix) Drayton Neighbourhood Plan 2016

The Drayton Neighbourhood Plan was adopted in July 2016 following a successful referendum within the parish.

Since its adoption the Neighbourhood Plan now forms part of the Development Plan for Broadland, meaning it forms one of the main considerations in the determination of planning applications within the parish.

The Neighbourhood Plan contains a series of planning policies, developed by the community, which seek to influence the future development of Drayton. The policies add local detail and depth to more strategic planning documents, such as the Joint Core Strategy, in order to address specific local issues. Many of the policies are also backed up by projects that the parish council will take forward in support of the policy theme.

Of particular relevance to green infrastructure are the following policies and projects:

Policy	Project(s)
<p>Policy 7: Improved walking and cycling routes</p> <p>Development which would provide or help to provide improvements to the network of footpaths or cycling routes in Drayton will be supported.</p>	<p>Project 2: Walking and Cycling Routes</p> <p>The parish council supports the protection, enhancement and expansion of the network of footpaths and cycleways in and around Drayton in order to create a more joined-up route around and through the village.</p> <p>Specifically, the parish council supports:</p> <ul style="list-style-type: none"> - The protection and improvement of existing formal and informal routes. - Improved road crossing opportunities and facilities on Fakenham Rd. - Improved signage and way-finding in the village centre and at key access points to footpaths and cycle routes such as connections with the Marriott's Way. - The creation of a new contiguous route running from Low Road in the village centre to Drayton Wood and Canham's Hill and onwards to Hall Lane, School Rd and Drayton Drewray and the Marriott's Way. - The introduction of safe, segregated cycle-ways on the existing network and as part of any new road schemes where appropriate. - The introduction of secure cycle parking at bus stops and village centre locations.
<p>Policy 8: Nature conservation</p> <p>Development which would undermine the integrity of the River Wensum Special Area of Conservation, or the Marriott's Way green infrastructure corridor, as identified in Figure 5, will not be permitted. Development which would enhance the nature conservation interests of these areas will be supported.</p>	<p>Project 3: Local Green Infrastructure</p> <p>The Parish Council supports the maintenance , protection and enhancement of the Drayton Drewray, Drayton Wood and Canham's Hill as important components of local green infrastructure. Where possible, opportunities should be explored to enhance the environment between these sites to improve their connectivity.</p> <p>The Parish Council encourages the provision of safe pedestrian access to Drayton Drewray potentially including a crossing point across the Norwich Northern Distributor Route to ensure the site does not become disconnected from the rest of the Plan area when the new road is delivered.</p> <p>The Parish Council also encourages the provision of limited formal car parking for visitors to Drayton Drewray to improve accessibility to all. Parking should be provided in a form that is environmentally sensitive and unobtrusive but improves access for those less able to journey to the site on foot or by bicycle. Consideration should</p>

	be given to the use of permeable surfaces and SUDs in order to mitigate any impact on potential surface water flooding across the area. Parking spaces should be accompanied with improved way-marking and interpretation to increase understanding of the site's special character.
Policy 9: Increasing the use of the King George V Playing Field Proposals for development which would provide new or improved facilities likely to increase the use of the King George V Playing Field will be supported.	Project 4: King George V Playing Field The Parish Council supports provision of new and improved facilities potentially including new recreation buildings that can help to increase the use of the King George V Playing Field. This could include new sports pitches and associated facilities, new informal leisure and recreation areas or enhanced children's play equipment. The Parish Council supports measures that will improve the safety for pedestrians and cyclists to existing formal and informal access and egress points to the King George V Playing Field. Where possible, opportunities to create new, safe formal access and egress points should be explored.

x) Hellesdon Neighbourhood Plan 2017

The Hellesdon Neighbourhood Plan was successful at a local referendum and subsequently made by Broadland District Council in December 2017. The document now forms part of the Broadland Development Plan.

The Plan contains a number of policies that seek to add local detail to more strategic planning documents and, in doing so, address specific local issues.

One policy in particular relates to green infrastructure and this is set out below.

Policy
Policy 1: The Hellesdon Green Grid Where possible, new development proposals which meet other development plan policies will be expected to contribute to the creation of the green grid identified in Figure 4 either on site or, where appropriate having regard to the legal requirements, through a planning obligation. Features of a green grid that developments will be particularly encouraged to contribute to include: <ul style="list-style-type: none"> • Native avenue tree-planting, particularly along Hospital Lane & Middletons Lane, Low Road, Drayton High Road, Reepham Road and Cromer Road • Hedgerows and species rich vegetated verges • Pockets of managed wild-space and woodland • Areas of more wild green space from the River Wensum, through Rabbits Hill and the Golf Course site towards Reepham Road. Where a contribution towards the green infrastructure is a requirement of a development, the developers will be expected to make provision for the long-term maintenance of their part of the green grid.

Any future provision of green infrastructure should be designed to minimise ongoing costs that would be incurred by public bodies, for example through the selection of species that require minimal maintenance.

Development that is detrimental to the green grid and results in the loss of features such as those outlined above will be discouraged. Particular consideration should be given to avoiding the loss or damage to veteran or ancient trees, as defined by Natural England, in order to preserve their historic, ecological and amenity value.

xi) Horsford Neighbourhood Plan

The Horsford Neighbourhood Plan was made by Broadland District Council on 12th July 2018.

The Neighbourhood Plan contains a section on the environment and landscape which, itself, contains a number of relevant policies as set out below.

Policy
<p>ENV1: Woodland and heathland</p> <p>Development proposals that protect or enhance the natural environment will be supported. Of particular significance is St Faith's Common and the County Wildlife Sites. Any new development proposal located near woodland should demonstrate how it would protect, and where possible, enhance the current natural environment (increasing biodiversity and recreational opportunities).</p> <p>New dwellings should be built at a sufficient distance from woodland so that the biodiversity and amenity value of the area is not adversely impacted.</p>
<p>ENV2: New circular footpath</p> <p>Development proposals should seek to maintain and enhance the connectivity of all green corridors wherever possible to enable walking and cycling within the parish.</p> <p>Improvement to the existing network of public rights of way will be supported by the creation of appropriate links. The Neighbourhood Plan supports the provision of a new circular footpath that joins up other footpaths within the parish. Of particular importance is access to heritage assets, open spaces, shops and community facilities within the village.</p>
<p>ENV3: Local Green Space</p> <p>Existing recreational space, including school playing fields and land used for outdoor sport and recreation should not be built on, except for buildings that would enhance education, sporting or recreational activities on the land. Proposals for the development of such buildings will be supported provided that their scale and design would be in keeping with the character of the location and that the impact on the amenity of surrounding properties would be acceptable.</p> <p>The following areas are designated as Local Green Space for special protection:</p> <ol style="list-style-type: none"> 1. Horsford Recreation Ground (behind Horsford Village Hall) 2. The Butterfly Mill green 3. The Pinelands green 4. That part of the strip of land that has the village sign on it (a green gateway to the village) and lies to the north of the access permitted by planning permission 20170409 and west of the footway envisaged by that application.

5. The Horsford Pits
 - i. Green Lane
 - ii. Pyehurn Lane
 - iii. Dog Lane

ENV4: Views and vistas

The Neighbourhood Plan seeks to protect views across the parish that are of particular community importance, which include:

1. Green Lane Watering Pit towards the Cromer Road
2. Green Lane looking northeast towards the rifle range and Horsford Woods

Development within these views that is overly intrusive, unsightly or prominent will not be supported.

Views and vistas along streets and/or spaces to the surrounding countryside should be created or kept within new developments, to ensure the rural feel and connection with the countryside is maintained.

ENV5: Trees and site boundaries

Development proposals should seek to retain mature or significant trees, groups of trees or woodland, where appropriate. New developments should incorporate significant tree planting to retain the rural feel, improve biodiversity, extend amenity value and soak up rainwater.

Where site boundaries and entrances are adjacent to the countryside or near woodland, they should be soft, using trees and native hedgerows, giving a rural character to the development edge. New developments located at the village entrances should be enhanced with trees, shrubs and flower planting.

The Neighbourhood Plan also includes a small number of related projects for the community to take forward, as follows:

- Develop a set of recreation walks.
- Further tree planting.
- Signage for locally important heritage assets, that are accessible and not on private land.
- Develop a maintenance programme for additional planting.
- More seating around the village and on formal green spaces.

4. Methodology

a) Research and mapping

The initial phase of developing the Project Plan involved desk-based research and mapping of existing green infrastructure in the area using GIS. Research involved examining relevant strategies, plans and guidance (see section 3) for particular policies and proposals that are likely to have implications for green infrastructure in the area.

Mapping the existing green infrastructure in the area, such as sites with local, national and international designations, current public rights of way and areas of common land, helped to identify opportunities for making green connections and enhancements to particular areas, particularly around settlements where future housing growth is expected.

The culmination of this phase of work was a long-list of project opportunities, set out on a parish-by-parish basis, that had yet to be assessed via any stakeholder discussions or feasibility work. This list was subsequently re-worked and items compiled into particular thematic (e.g. Marriott's Way Circular Walks) or location-specific (e.g. Felthorpe Common / Drayton Drewray – Site Enhancements) projects, that might be made up of a number of different elements. These projects were then prioritised, based on their strategic importance and deliverability (chiefly, whether they were located in or near to an area of growth and whether there are land ownership/accessibility issues).

b) Site visits

Site visits were required in the case of certain projects in order to ascertain the feasibility of what was being proposed in terms of access, condition of the site, proximity to settlements etc. This helped to refine project ideas in order to make them more achievable.

c) Stakeholder engagement

For each project, a number of key stakeholders were identified and discussions were held with a number of these organisations in order to gain their views on whether they would support the project, whether the project idea could be improved and whether they had suggestions for additional projects within the area.

Key stakeholders included:

- Drayton Parish Council
- Drayton Fuel Allotment Trust
- Felthorpe Parish Council
- Felthorpe Fuel Allotment Trust
- Forestry Commission
- Hellesdon Parish Council
- Horsford Neighbourhood Plan Steering Group

- Horsford Parish Council
- Horsham & Newton St Faiths Fuel Allotments Charity
- Norfolk County Council Natural Environment Team
- Norfolk Geodiversity Partnership
- Norfolk Wildlife Trust
- Norwich City Council
- Norwich Fringe Project
- South Norfolk Council
- Taverham Parish Council

In addition, discussions have taken place with those landowners and/or their representatives, whose details are known, in the development of these project opportunities. These discussions and communications will, of course, need to continue and agreement on proposals will need to be reached before any project can be delivered.

d) Refining projects and developing Project Plan

Following stakeholder discussions, further refinements were made to the list of projects and the Project Plan was developed, including details of:

- Project title
- Wider strategic fit
- Location
- Project description
- Stakeholders
- Estimated cost
- Possible funding streams
- Provisional timescale

It should be noted that this Project Plan only goes so far in respect of the detailed requirements and costings related to each project. The costings and timescales highlighted in the action plan are only estimates at this stage, and more detailed project development will be required in each case.

e) Consultation on draft Project Plan

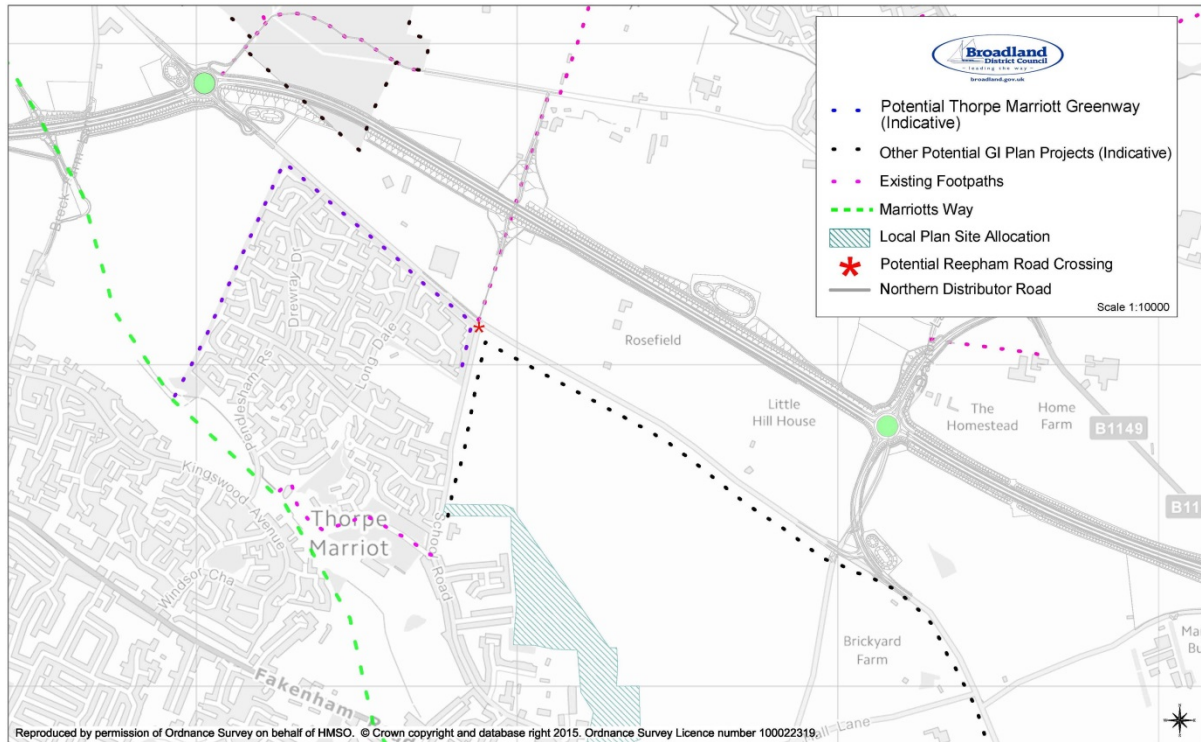
The draft Project Plan was subject to consultation with the identified stakeholders between 2nd February and 19th March 2018, where 20 comments were made.

5. Project Proposals

Project 1: Thorpe Marriott Greenway

a) Location

This project takes in an area of tree-belt that skirts around the west, north and north-east of Thorpe Marriott, in Taverham and Drayton. It links the Marriott's Way (to the south west of the settlement) with the junction of School Road and Reephram Road (to the north east) and the playing field to the east of the settlement.



b) Description

The intention is to provide a footpath within the tree belt, which would create a circular walk for residents of Thorpe Marriott as well as connecting the Marriott's Way with the new 'green bridge' running over the NDR and then north to Horsford. This will also help to deliver the identified Thorpe Marriott to Hevingham Secondary Green Infrastructure Corridor (GNIP S6).

This will link into other proposed greenways in the area to provide long-distance connections from the edge of the City out to Taverham and Horsford in accordance with the Marriott's Way Primary Corridor and the North-west Forest and Heaths (Connections) project (GNIP ref. GI P8.1). There may also be the option of incorporating a cycleway at some date in the future.

The tree belt is owned by Broadland District Council meaning that there is no requirement to seek permissions from landowners for this project.

In summary, the scheme will:

- Provide an accessible footpath throughout the tree belt that surrounds Thorpe Marriott, from Naber Furlong in the south-west, then north to Jordan Close, east to the junction of Reepham Rd and School Rd, and along School Rd to the playing field.
- Provide associated infrastructure, including pedestrian gates at the two extremities of the tree belt and at the two locations where the path is traversed by Drewray Drive and Longdale. Signage and dog bins will also be required.
- Require signage and connectivity to link the end of the path at Naber Furlong with the Marriott's Way near to this location. Signage also to be provided at the School Rd / Reepham Rd junction, to indicate further connections.

c) Opportunities

The tree belt is already in situ and currently exists as a landscape buffer to the north and west of Thorpe Marriott. The development of a path through the belt offers a perfect opportunity to residents and to walkers using the Marriott's Way who may wish to undertake a circular route that spurs off of the main route in this area. The development of circular walks off of the Marriott's Way is also a priority of the Marriott's Way Improvement & Delivery Plan 2015-2025.

The new path will also provide users with a link to the 'green bridge' that is being installed over the NDR north of the junction between School Road and Reepham Road, allowing connectivity to Horsford and the woodland sites to the north. This also relates to the 'Drayton to Horsford Greenway' project within this Plan (Project 2) which proposes to connect with the green bridge over the NDR via footpaths along School Road and Reepham Road from the east, including the development of safe crossing measures across Reepham Road at this junction.

The project may also provide opportunities for enhancing biodiversity within the tree belt, with (for example) the possibility of trees that are removed being replaced by other appropriate planting, or by the planting of restrictive vegetation adjacent to property boundaries to deter trespassers.

d) Risks

- The project is reliant on sufficient funding being available for its completion. It is anticipated that funding for the scheme will be sought via Community Infrastructure Levy (CIL) and/or Section 106 money, if appropriate.
- There may be concerns over public access, for example in relation to safety and security. For this reason, it will be prudent to consult the police Architectural Liaison Officer during project delivery.
- As the development of the footpath will require the removal of a number of trees, a felling license will be required in order to undertake the work.
- It is likely that the project will require planning permission.
- The continued maintenance of the tree belt will need to be ensured and facilitated.

e) Justification

This project addresses Objectives 3, 4 and 5 of this Project Plan.

The Green Infrastructure Strategy 2008 proposes a range of Secondary Green Infrastructure Corridors within the district, one of which seeks to connect the Marriott's Way at Thorpe Marriott to Hevingham (via Horsford). This is already detailed within the Greater Norwich Infrastructure Plan as project GI S6 'Hevingham to Thorpe Marriott Secondary Corridor'. This greenway project seeks to deliver an element of this larger scheme.

The project also accords with policies and projects within the Drayton Neighbourhood Plan which seek to enhance and expand the network of footpaths around Drayton, as well as improving access to Drayton Drewray which lies just to the north of Thorpe Marriott, across the route of the Northern Distributor Road.

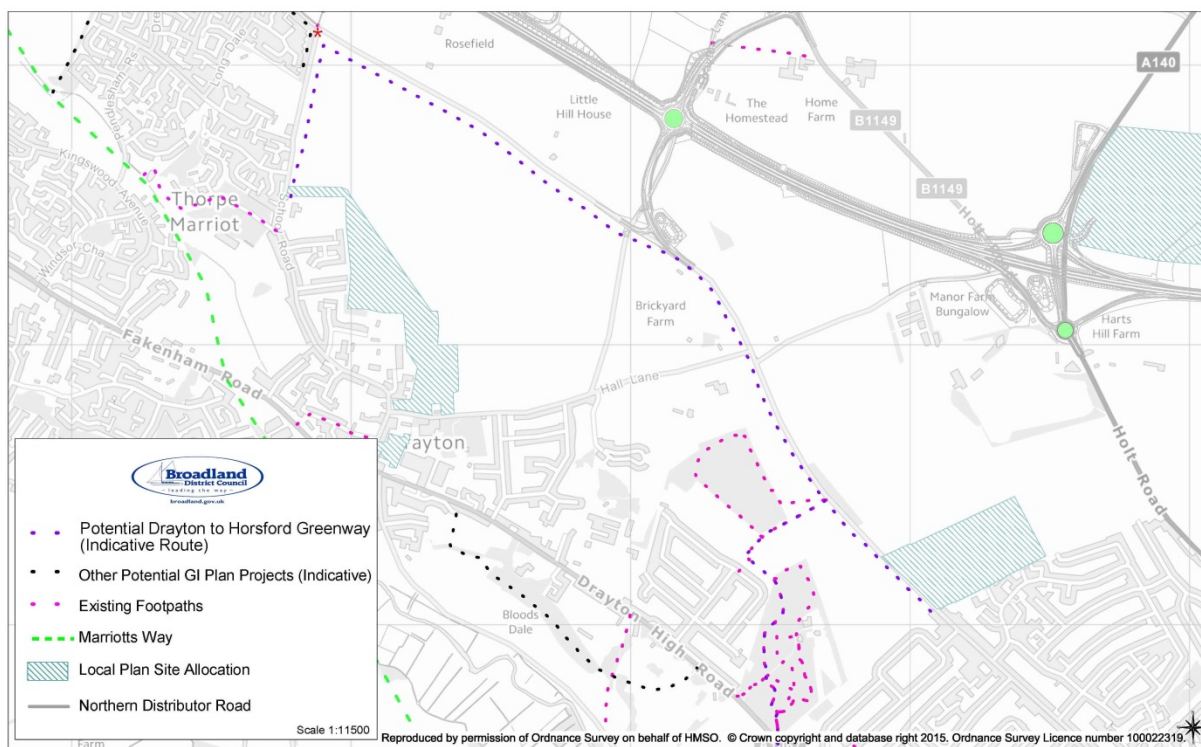
As such, it is a key element in achieving a wider network of green infrastructure to serve the communities in the area.

Project 2: Drayton to Horsford Greenway

a) Location

This project seeks to develop a continuous ‘greenway’ link between Drayton and Horsford, starting at the A1067 in the far east of the parish and linking the following components:

- Drayton Wood CWS
- Canhams Hill CWS
- Land south of Reepham Road, between Hellesdon and Thorpe Marriott
- Footpaths associated with Manor Park development, off Hall Lane
- New safe crossing measures over Reepham Road
- Public Right of Way and new green bridge over NDR



b) Description

The project aims to develop a green corridor (‘greenway’) that connects the south east of Drayton (picking up the Hellesdon-Drayton Greenway - Project 3, as it emerges at Drayton High Rd) to Horsford, via various G.I. components, as described above. The project will also potentially connect the western edge of Hellesdon to the greenway network via a connection running parallel to Reepham Road, from the edge of the settlement.

The greenway would offer more than simply a footpath and would constitute a green corridor that is functional for both people and wildlife. While the central ‘spine’ of a greenway would be a defined path or track, this may be fringed by verges of low-lying, wild vegetation, for example.

Two of the green infrastructure assets to be connected are designated as County Wildlife Sites (CWS) - Drayton Wood and Canham’s Hill. CWS are considered to be of value for wildlife in a county

context and the CWS system in Norfolk is managed by a partnership of Norfolk Wildlife Trust, Norfolk Biodiversity Information Service (NBIS), Norfolk County Council, Norfolk Biodiversity Partnership, Natural England, Environment Agency and the Broads Authority, with NWT taking the lead role. While CWS do not receive statutory protection, they are given some protection through the planning system.



Canham's Hill CWS viewed from the south east

In particular, Norfolk Wildlife Trust has indicated that Canham's Hill is currently unmanaged and in poor condition and that complete restoration of the site to a woodland (perhaps as a community woodland) would be advantageous. In addition, connecting the site to nearby Drayton Wood via an appropriate wildlife corridor (e.g. continuous hedgerow) would be highly beneficial for local wildlife populations.



Drayton Wood

Development of the greenway will utilise Public Rights of Way and Permissive Paths, where they exist, making improvements and enhancements to existing footpaths, including new signage and promotion of the walks and new planting and ecological enhancement, where practical.

However, work is needed to secure new links along various parts of the proposed corridor. This includes seeking a G.I. connection along land adjacent to Reepham Road and along School Road.

At the junction of these two roads, the project will seek safe crossing measures (e.g. new pedestrian crossing, safe refuges, warning signs for drivers etc.) for pedestrians wishing to cross Reepham Road to access the green bridge to the north (or the reverse).

This will link into other proposed greenways in the area to provide long-distance connections from the edge of the City out to Drayton, Horsford and Hevingham.

In summary, this project seeks to:

- Deliver new greenway connections at Canham's Hill and along Reepham Road in order to deliver a continuous green corridor linking Drayton Wood at Drayton High Road to the new green bridge over the NDR.
- Produce and deliver a conservation management plan for Canham's Hill CWS.
- Produce and deliver a conservation management plan for Drayton Wood CWS,
- Enhancement of current connections, where appropriate (e.g. surfacing, drainage etc.)
- Install safe crossing measures across the Reepham Road at its junction with School Road.
- Install waymarking throughout the greenway to indicate destinations, distances etc., including map boards at strategic locations.
- Raise awareness of the greenway using promotional literature, to be made available online and in local, public locations.

c) Opportunities

The main opportunity arising from this project is the securing of new GI corridor components to serve local communities.

The development of this route will also help (along with the Thorpe Marriott Greenway) to deliver a wider circular route around Drayton, one of the aspirations of the adopted Drayton Neighbourhood Plan.

There may be the opportunity to incorporate cycleways into some elements of this corridor, allowing a flow of cyclists between Horsford, Drayton and Hellesdon (e.g. students of Hellesdon High School that live in Drayton/Horsford).

d) Risks

- There may be difficulties in securing landowner permissions for some of the proposed, new greenway elements.
- The project is reliant on sufficient funding being available for its completion. The most likely sources of funding are Community Infrastructure Levy (CIL) or Section 106 money.
- Consultation will be necessary with Norfolk County Council Highways regarding safe crossing measures over Reepham Road. There may be limitations on what can be implemented at this location.
- The continued maintenance of the different elements of the scheme will need to be ensured and facilitated during the project development stage. It is likely that different elements will be the responsibility of different organisations.

e) Justification

This project addresses Objectives 2, 3, 4 and 5 of this Project Plan.

The project also fits within the overall GNIP Priority Area, 'North West Forest and Heaths (Connections)', which seeks to develop a primary corridor connecting woodlands and heaths to the

north west of Norwich. Identified in the Green Infrastructure Strategy, the area to the north-west of Norwich is noted for its opportunities for wood pasture and heathland habitat enhancement and creation. This particular element of the corridor will connect woods at Drayton Wood, Canham's Hill, Drayton Drewray, and Felthorpe and St. Faith's Commons.

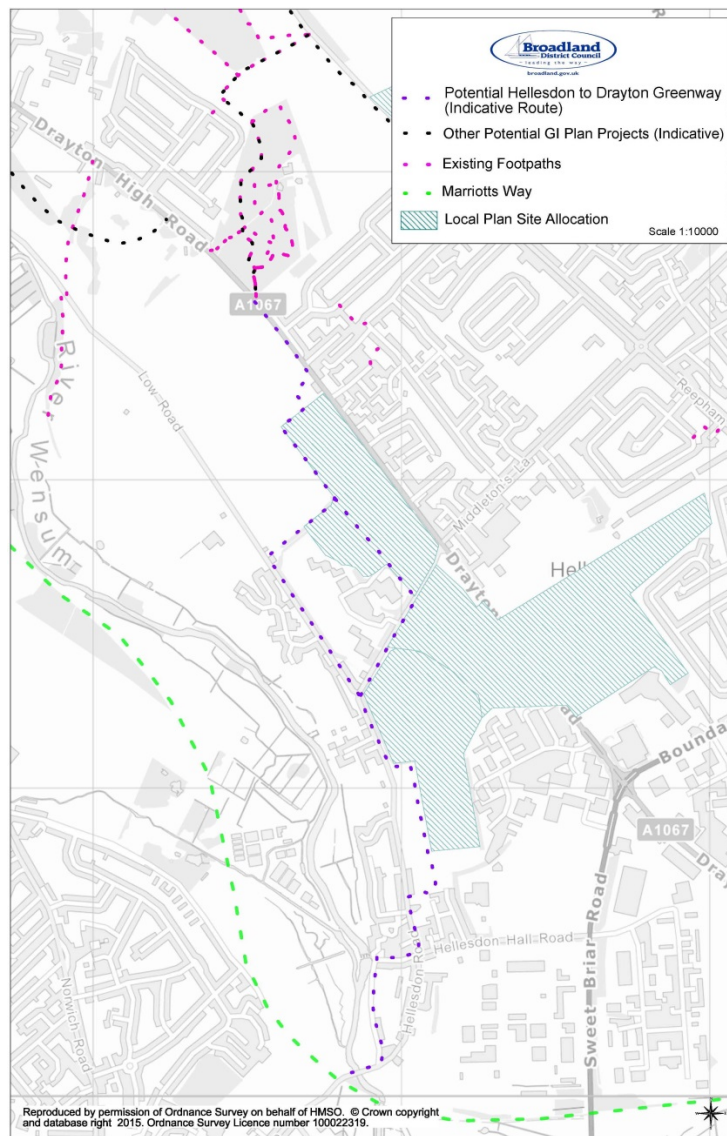
The project also accord with policies and projects within the Drayton Neighbourhood Plan which seek to enhance and expand the network of footpaths around Drayton, as well as improving access to Drayton Drewray which lies just to the north of Thorpe Marriott, across the route of the proposed NDR.

The scheme therefore forms an important component in the development of an enhanced network of green infrastructure to serve local communities in this part of the district.

Project 3: Hellesdon to Drayton Greenway

a) Location

This project seeks the development of a green corridor or greenway, running north-south through the west of the parish of Hellesdon. At its southern end, the corridor will begin at Hellesdon Bridge (in north-west Norwich, at the junction of the Marriott's Way) and it will lead to Drayton Wood, at the northern edge of Hellesdon parish. This takes in development sites such as the Royal Norfolk Golf Course and Hellesdon Hospital.



b) Description

The project looks to create a green corridor or 'greenway', running north-south along the western side of the parish of Hellesdon, branching off from the Marriott's Way in the south (at Hellesdon Bridge, within the Norwich city boundary) and connecting to Drayton Woods in the north. This will primarily be delivered through the development of sites at the Golf Course and Hellesdon Hospital, as part of the requirements for on-site green space in these locations. It is proposed that the greenway will then run north-west from the Hospital site, skirting around the boundary of



Disused footpath between Carrowbreck and Hellesdon Hospital

Carrowbreck House to meet Drayton Road. The inset map displays two broad options for connectivity through the Hospital site, with the preference being for the greenway to skirt the western fringe of the site, parallel to Low Road, before veering north east to meet the track which links the Hospital to Carrowbreck. The other option takes in less green space, using Hospital Lane before cutting through the main complex of buildings to access this track.

From a wider, strategic point of view there is a desire to connect this route to the entrance to Drayton Wood, on Drayton Road, by developing a section of corridor between Carrowbreck and the wood.

This greenway would then connect to the proposed 'Drayton to Horsford Greenway' (Project 2) in the area to provide long-distance, green connections from the city out to Drayton, Taverham, Horsford and Hevingham, in accordance with the Marriott's Way Primary Corridor and the North-west Forest and Heaths (Connections) project (ref GI P8.1). There may also be the option of incorporating a cycle-way at some date.

The greenway would offer more than simply a footpath and would constitute a green corridor that is functional for both people and wildlife. While the central 'spine' of a greenway would be a defined path or track, this may be fringed by verges of low-lying, wild vegetation, for example. Whilst much of the proposed route, at this stage, is indicative, the majority of the greenway falls within green spaces. Small sections (mainly to the south, within the Norwich City boundary) will likely need to follow sections of minor road.

In summary, this project seeks to:

- Deliver new greenway connections between the end of Clovelly Close, Hellesdon and the Golf Course development; and north from here, through the green spaces on the Hellesdon Hospital site, to link to Carrowbreck and Drayton High Road.
- Enhancement of current green infrastructure, where appropriate (e.g. clearance, surfacing, drainage, planting etc.)
- Install waymarking throughout the greenway to indicate destinations, distances etc., including map boards at strategic locations.
- Raise awareness of the greenway using promotional literature, to be made available online and in local, public locations.

c) Opportunities

A large part of the G.I. connections that are being sought through this project are ones that should arise as part of on-site provision through development in Hellesdon. This primarily relates to development proposed at the Royal Norfolk Golf Course and at Hellesdon Hospital.

d) Risks

- Much of the proposed route is indicative at this stage. The final route will depend on negotiations with landowners and it may be that certain elements will prove difficult to deliver should there be complications in reaching agreement.
- Much of the proposed greenway relies on green infrastructure connections being delivered through development (the Golf Course site and the Hospital). Permission has been granted and G.I connections agreed as part of the Golf Course application, but no planning application has come forward, as yet, relating to the Hospital site. Failure of this scheme to progress will result in a significant gap in connectivity of the greenway.
- Other than those elements which are expected to be delivered via development (see above), the project is reliant on sufficient funding being available from elsewhere for its completion. It is anticipated that funding for the remainder of the scheme will be sought via CIL.
- The continued maintenance of different elements of the scheme will need to be ensured and facilitated during the project development stage. It is likely that different elements will be the responsibility of different organisations.

e) Justification

This project addresses Objectives 1, 3, 4 and 5 of this Project Plan.

The project also fits within the overall GNIP Priority Area, 'North West Forest and Heaths (Connections)', which seeks to develop a primary corridor connecting woodlands and heaths to the north west of Norwich. Identified in the Green Infrastructure Strategy, the area to the north-west of Norwich is noted for its opportunities for wood pasture and heathland habitat enhancement and creation. This particular element of the corridor will connect the city, through Hellesdon, to woodland elements in south east Drayton.



Land between Hellesdon Hospital and Low Road,

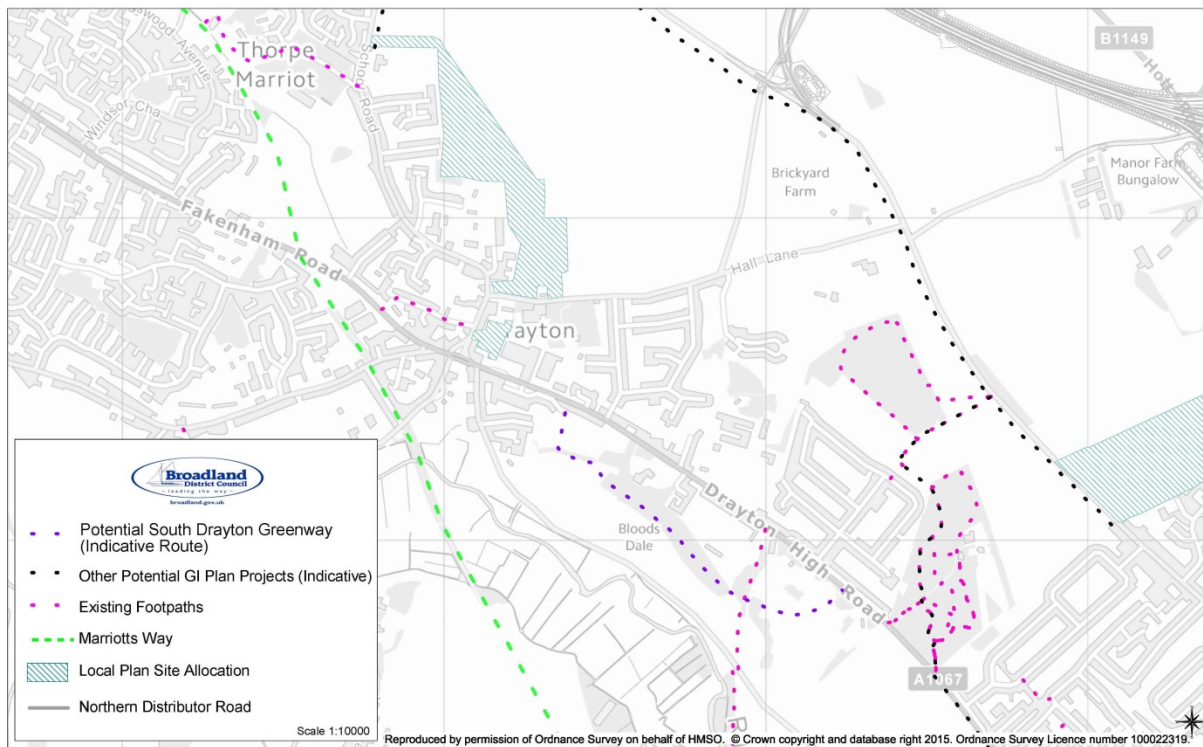
In addition, the emerging Hellesdon Neighbourhood Plan includes 'to protect and enhance local green infrastructure' as one of its objectives, and a policy concerning the development of a 'green grid' of local G.I. connections, facilitated through local housing development. Elements of this green grid run north-south, parallel to Low Road and Drayton High Road, and therefore closely relate to this project.

As such, the project forms a key element in achieving a wider network of green infrastructure to serve the communities in the area.

Project 4: South Drayton Greenway

a) Location

This project concerns the area of green space that lies between Drayton High Road and Low Road, in the parish of Drayton. It extends from Lodge Breck and Fairview Close in the west to Drayton High Road in the east, taking in Drayton Lodge, the area known as Bloods Dale, and the former David Rice Hospital site.



b) Description

The project seeks to secure a greenway to the south of Drayton village, linking the village centre with Public Rights of Way in Drayton Wood, to the south east, which forms part of the greenway which skirts the north of the village (see Project 2). This would create a circular route around Drayton which achieves one of the main aspirations of the Drayton Neighbourhood Plan.

The greenway would offer more than simply a footpath and would constitute a green corridor that is functional for both people and wildlife. While the central 'spine' of a greenway would be a defined path or track, this may be fringed by verges of low-lying, wild vegetation, for example.

The tree belt that runs between Drayton High Road and the Low Road provides an ideal basis for the development of the greenway. The tree belt finishes at Green Lane which runs north/south to the west of the former David Rice Hospital site, made up of woodland and open areas of former parkland.

In the development of such a greenway, there would need to be a degree of waymarking, indicating destinations and direction of travel. In addition, there may be scope for limited interpretation

material, for example in the area known as 'Bloods Dale' which is said to be the site of a battle between the Danes and the Anglo-Saxons during the Middle Ages.

In summary, this project seeks to deliver the following elements:

- The development of a new, accessible greenway, linking Lodge Breck/Fairview Close in Drayton to Drayton High Road further east, taking in Bloods Dale and the former David Rice Hospital site.
- Installation of waymarking to indicate destinations/distances, including map boards at key locations. Consider installation of interpretation board at Bloods Dale.
- Enhancement of biodiversity and access at the former David Rice Hospital site.
- Raise awareness of the greenway using promotional literature, to be made available online and in local, public locations.

c) Opportunities

Parts of the greenway could be brought forward as part of potential developments to the south of Drayton High Road. Even so, there may remain 'gaps' in the corridor that would still need to be addressed by other means.

The David Rice Hospital site is of high ecological value and is considered by Norfolk Wildlife Trust to be of County Wildlife Site value. The site is not suitable for tree planting, but should be considered primarily as a grassland restoration site.

d) Risks

- The majority of the proposed greenway will rely on green infrastructure connections being delivered through development proposals in this location. Failure of individual schemes to progress will result in significant gaps in the connectivity of the greenway.
- The continued maintenance of the tree belt will need to be ensured and facilitated during the project development stage. There may be potential for the scheme to be adopted by Drayton Parish Council in the long term.

e) Justification

This project addresses Objectives 2, 3 and 5 of this Project Plan.

As discussed above, the project also achieves one of the main aspirations of the Drayton Neighbourhood Plan, which is to 'create a new contiguous route running from Low Road in the village centre to Drayton Wood and Canham's Hill and onwards to Hall Lane, School Road and Drayton Drewray and the Marriott's Way'.



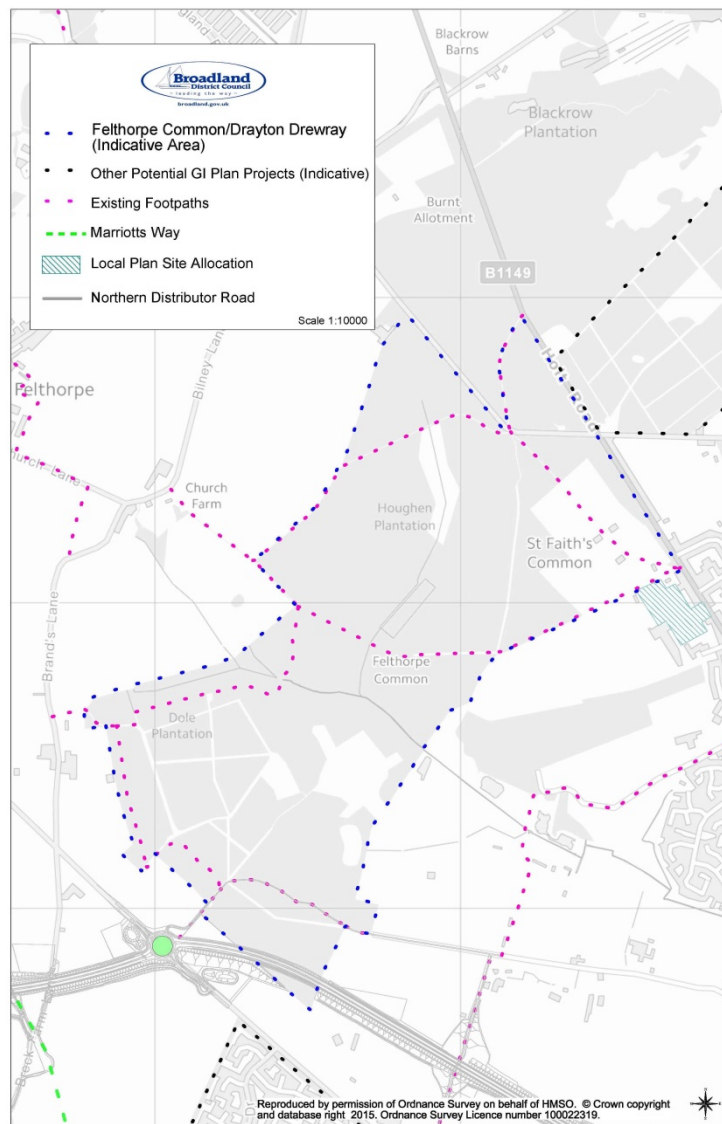
Former David Rice Hospital site

The project therefore forms a key component in developing a wider network of green infrastructure to serve local communities in the area.

Project 5: Felthorpe Common / Drayton Drewray - Site Enhancements

a) Location

This project focuses on the large area of woodland (approx. 149ha) which lies between Holt Road and Reepham Road, west of Horsford. The woodland incorporates St. Faiths Common, Houghen Plantation, Felthorpe Common, Whinny Hills, Dole Plantation and Drayton Drewray. The woodland area also comprises several pockets of heathland/grassland.



b) Description

This project focuses on the aforementioned large area of woodland/grassland as a key green infrastructure asset, serving the local communities of Horsford, Drayton, Thorpe Marriott, Taverham and Felthorpe. The project will look to enhance the site from a recreational and ecological perspective.

The entire site spans the parish boundaries of Drayton, Felthorpe and Horsford, with the majority lying within Felthorpe. The area includes three designated County Wildlife Sites, these being Whinny

Hills and Common, Drayton Drewray, and Pyehurn Lane Woodland. Approximately 50ha of the site is also registered as common land. This includes most of Drayton Drewray and the area in the centre of the overall site known as Felthorpe Common.



St. Faith's Common, Horsford

Although most of the land is in private ownership (amongst two landowners), the registered commons at Drayton Drewray and Felthorpe Common are owned and managed by local, charitable trusts.

Broadland District Council leases a small area of land, adjacent to Holt Road and spanning either side of Haveringland Road, from the Horsham and Newton St Faith's Fuel Allotment Charity. This is the area known as St. Faith's Common. Much of the management of the Common includes maintaining the two small car parks either side of Haveringland Road, undertaking necessary tree health and safety works, maintaining the paths in the area and looking after the small pocket of restored heathland on St. Faith's Common.

The whole woodland area is served by a network of public rights of way, which offer circular walks around the site and which connect the area to the villages of Horsford, Felthorpe, and Thorpe Marriott.

There are several key elements to this project:

- Improved public access within the overall site, including improvements to footpaths, installation of waymarking, signage and promoted circular routes.
- Connecting the existing heathland/grassland pockets within the area via wide rides, to allow 'nature highways' which will improve the sustainability and biodiversity of the heathland habitats. Consideration to be given to introduction of livestock for management purposes (e.g. at St. Faiths Common, currently managed by Norwich Fringe Project, and at Drayton Drewray).
- Consideration to be given to developing further heathland/grassland pockets.
- Improved car parking facilities at the car parks located to the north and south of Haveringland Rd (e.g. re-surfacing, toilets, dog bins and map boards).

- Consider development of a new, small-scale car park at southern entrance to Drayton Drewray, accessed via new roundabout on NDR.
- Additional ecological surveys (incl. reptile and bird surveys) and co-ordinated wildlife and recreational management across the sites of different ownership within the project area.
- Improvements to pedestrian connections leading to the site from nearby settlements, where necessary, including signage and map boards.
- Promotion of site within nearby communities via promotional literature.

c) Opportunities

Current and future housing developments in the proximity of this site bring opportunities to resource these G.I. enhancements through the use of Community Infrastructure Levy and possible Section 106 agreements.



Grassland at Drayton Drewray

There are opportunities to expand upon and connect the existing pockets of heathland within the site without jeopardising the overall woodland nature of the area. This will help to achieve a key priority for this character area, as set out within the Landscape Character Assessment 2013.

Much of the site is registered common land (Felthorpe Common, most of Drayton Drewray) and there may be opportunities to expand the footpath network in these areas of the site in order to create additional

circular routes etc.

The Norfolk Wildlife Trust developed a County Wildlife Site Management Plan for Drayton Drewray in 2015 which sets out an action plan for enhancing and maintaining the wildlife value of the site. The site has open access and is currently unmanaged. In summary, management work recommended by the plan includes the restoration of species-rich fen, plus on-going management of bracken and the acid grassland. Restoration of the existing fen and the re-introduction of grazing would constitute higher-end management, together with the installation of access gates and interpretation on the site.

d) Risks

- Different parts of the site are in the ownership of five separate bodies. In order for the project to be fully realised, there will need to be agreement with each of the bodies for enhancements to be made to their land.
- Houghen Plantation and Drayton Drewray currently have minimal public access and increasing access to these sites needs to be done with sensitivity, as these areas have high ecological value.

- The project is reliant on sufficient funding being available for its completion. Residential development being progressed in the locality may mean that funding for the project can be sought via CIL or Section 106 money.
- The continued maintenance of the site will need to be ensured and facilitated during the project development stage. There may be a number of options for dealing with management, but a partnership approach between the different bodies currently responsible may be most effective.

e) Justification

This project addresses Objectives 2, 3 and 5 of this Project Plan.

The project also fits within the overall GNIP Priority Area, 'North West Forest and Heaths (Connections)', which seeks to develop a primary corridor connecting woodlands and heaths to the north west of Norwich. Identified in the Green Infrastructure Strategy, the area to the north-west of Norwich is noted for its opportunities for wood pasture and heathland habitat enhancement and creation.



Houghen Plantation, Felthorpe

This site sits between Drayton and Horsford, both of which are settlements experiencing significant development proposals. The enhancement of the woodland area will provide an attractive and accessible recreational experience for existing and future residents of the area, reducing visitor pressure on sensitive environmental assets which are within driving distance, including Buxton Heath and the North Norfolk Coast.

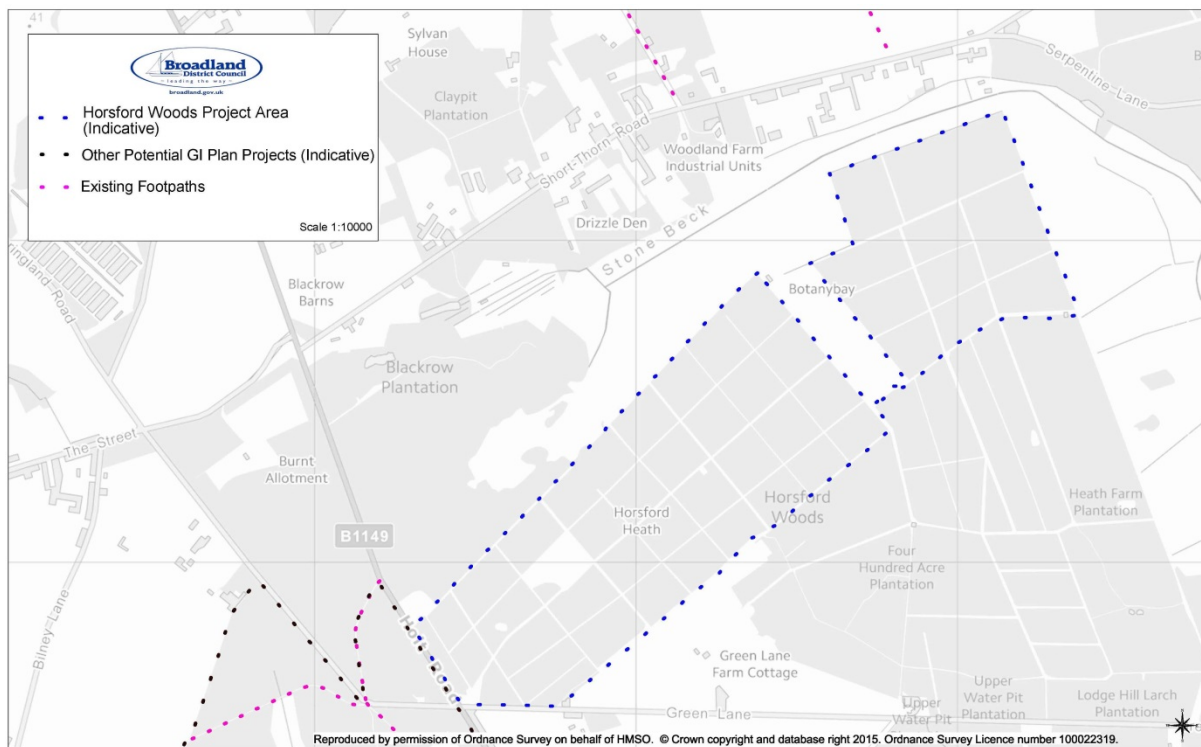
The project also has strong links with aspirations within the adopted Drayton Neighbourhood Plan and the emerging Horsford Neighbourhood Plan. The former includes a specific project which looks at 'GI improvements at Drayton Drewray, Canham's Hill and Drayton Wood'. The emerging Horsford Neighbourhood Plan includes suggested policy ideas, arising from public consultation, such as protecting existing woodland, creating new countryside walks, and developing woodland recreation.

The scheme therefore constitutes a key element in the development of a wider network of green infrastructure to serve local communities in this part of the district.

Project 6: Horsford Heath / Horsford Woods - Site Enhancements

a) Location

Horsford Heath and Horsford Woods occupy a large site of approx. 267ha to the east of Holt Road and north of Green Lane, to the north of the village of Horsford. The site is predominantly a commercial, coniferous plantation and it is leased by the Forestry Commission from more than one private landowner. The site is also a designated County Wildlife Site.



b) Description

This project seeks to make enhancements to Horsford Heath and Woods in order to make them more accessible and appealing to local residents as areas for recreation, as well as increasing their biodiversity value.

The western part of the site, known as Horsford Heath, is open to the public and includes a series of accessible tracks that have developed along woodland rides. There are also heritage features in this part of the site, in the form of two Bronze Age round barrows and the former WW1 and WW2 rifle range (still in operation) to the south. As the name suggests, areas of this site have been restored to heathland habitat. A small car park serves this part of the site, located at the corner of Holt Road and Green Lane.

Some areas of the site are important habitats for species such as wood lark, adder and marsh gentian.

The eastern part of the site, although leased and managed by the Forestry Commission, is not open to the public, although a smaller section on the north east edge of the site is in freehold ownership of the Commission.

Within Horsford Heath (the existing, publicly accessible part of the site) enhancements will include the following elements:

- Improved public access within the site, including improvements to footpaths and rides, and installation of waymarking and interpretation panels, where appropriate.
- Ecological survey to establish detailed recommendations for ongoing biodiversity management of the site, alongside its recreational function.
- Improved car parking facilities to the south west of the site, including better access, resurfacing, toilets, dog bins and map boards.
- Raise awareness of the site using promotional literature, to be made available online and in local, public locations. Consider signage to the site and map boards within Horsford village.

c) Opportunities

There are opportunities to expand upon, connect and manage the existing pockets of heathland within the site without jeopardising the overall woodland nature of the area. This will help to achieve a key priority for this character area, as set out within the Landscape Character Assessment 2013.



Horsford Heath

Possible, additional projects for the future might include exploring whether other areas within the wider woodland site

could be made accessible to the public. For example, if the north-eastern part of the site (owned by the Forestry Commission) could be accessed, then this might facilitate a connection to Short-Thorn Road and then to Hevingham Park (see Project 7). Likewise, if public access were allowed in other areas of the wider woodland site then this could allow for wider, circular connections to be developed in the Horsford area.

d) Risks

- In order for the project to go ahead, there will need to be agreement from the landowner(s) for particular enhancements to be made.
- The project is reliant on sufficient funding being available for its completion. Residential development being progressed in the locality may mean that funding for the project can be sought via CIL or Section 106 money.
- The continued maintenance of the site will need to be ensured and facilitated. It is anticipated that this will continue under the current arrangement, whereby (as leaseholders) the Forestry Commission act as site managers.

a) Justification

This project addresses Objectives 1, 2, 3 and 5 of this Project Plan.

As discussed earlier, significant residential development is occurring in the area, leading to increased pressure on the countryside. The enhancement of these woodlands will provide an accessible and enjoyable recreational asset to residents of Horsford.

As already noted, the project will also help to deliver strategic green corridor connectivity, as part of the 'North West Forest and Heaths' project (GNIP Project GIP8.1) and the 'Hevingham to Thorpe Marriott Secondary Corridor' (GNIP Project GIS6).

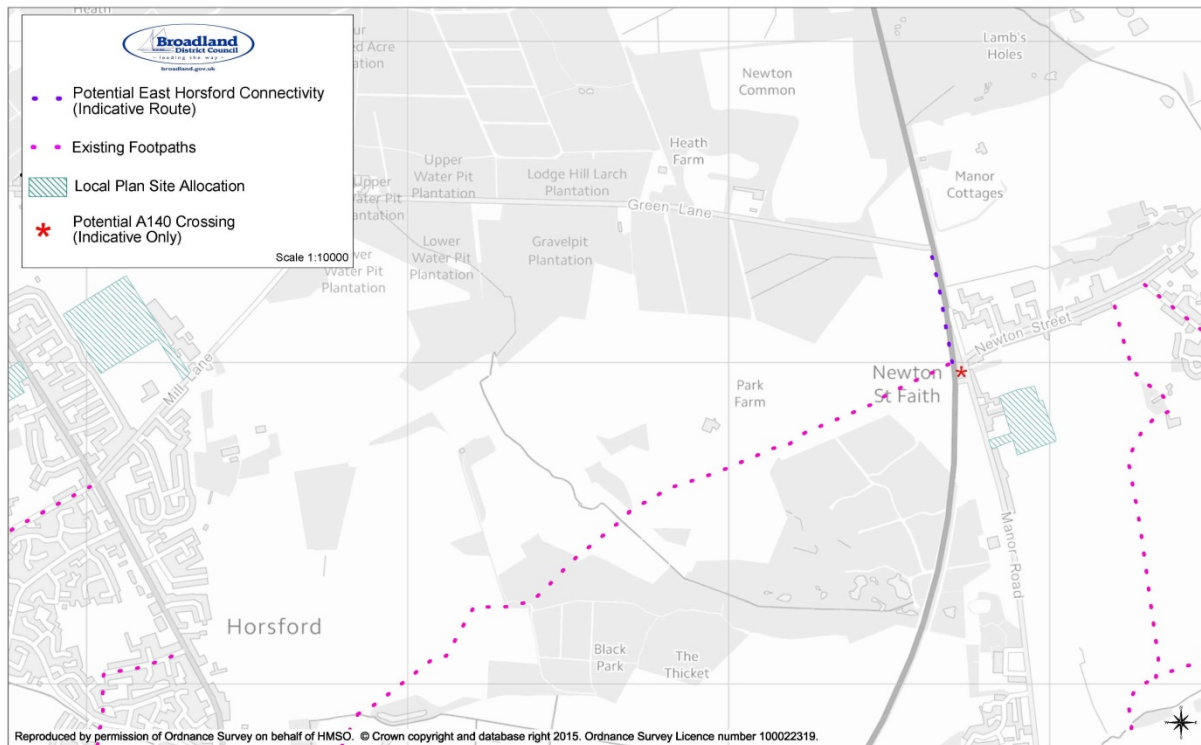
The project also has strong links with aspirations within the emerging Horsford Neighbourhood Plan. This includes proposed policies relating to woodland and heathland, footpaths and local green space.

The scheme is therefore an important element in developing a wider network of green infrastructure to serve communities in this area.

Project 7: East Horsford – Connectivity & Circular Walk

a) Location

This project seeks to enhance connectivity to the east of the village of Horsford, in the area of Black Park CWS, the A140 and Green Lane. This will help to promote a circular walk taking in the east of the parish. The project is based in a landscape rich in CWS, including the aforementioned Black Park, Horsford Heath & Woods and Castle Hill.



b) Description

The project seeks to enhance footpath connectivity to the east of Horsford village, creating a significant circular route around the east of the parish for residents and visitors.

It also seeks to reduce the limitations of the physical barrier (i.e. the A140) that runs between Horsford and Horsham & Newton St Faiths by introducing safe crossing measures, enabling residents of Newton St. Faith to have safer access to the footpath and G.I. network around Horsford.

Currently in this part of the parish, there are a variety of farm tracks as well as a PRoW which runs east-west between the A140 at Newton St. Faith and the southern end of Horsford village, on Holt Road.

A circular route for walkers currently exists that takes in the existing PRoW that runs from the Holt Road in Horsford to the A140, a small stretch of the A140 itself that runs north to Green Lane, Green Lane itself, Mill Lane, and then back onto Holt Road. This route is just over 4 miles in length and is currently used by local residents.

However, the stretch of route along the A140 is not suited for walkers, there being no dedicated footway - simply a narrow grass verge. The project therefore seeks roadside improvements for

walkers along the western side of this stretch of the A140. At its simplest, this could be in the form of a clearly marked path, with compacted hoggins, set back from the road.

In addition, as summarised above, the project will seek to introduce safe crossing measures for pedestrians over the A140 at Newton St. Faith. Such measures might include developing a central refuge (there is already a central, hatched, safety area for vehicles), introducing road signage to alert drivers of potential pedestrians, and developing a safe 'waiting area' on the eastern side of the A140, with a path connecting to Manor Road.

Alongside these elements, the wider project would involve promotion of the circular route, involving signage, leaflet promotion and footpath enhancements, where necessary.

Therefore, in summary, the project seeks to:

- Deliver a new footway connection along the western side of the A140, linking the junction of the PRow with Green Lane, as shown on the above map.
- Enhance the current PRow, stretching from Holt Rd, Horsford to the A140, where applicable.
- Install waymarking at key locations to indicate destinations/distances etc.
- Install safe crossing measures across the A140 to link the PRow with Newton Street at Newton St. Faith.
- Raise awareness of the circular walk using promotional literature, to be made available online and in local, public locations. Consider signage to the walk and a map board within Horsford village.

c) Opportunities

There is the opportunity to tie in this circular walk with local heritage elements, such as Castle Hill (south of Black Park), the Bronze Age barrows and WW1/2 firing range at Horsford Woods and Horsford Mill etc., thus creating a heritage trail.

d) Risks

- There is a risk that discussions with the relevant landowner and Norfolk County Council Highways fail to result in the development of the necessary footpath link and safe crossing measures along the A140.
- The project is reliant on sufficient funding being available for its completion. It is anticipated that funding for the scheme will be sought via Community Infrastructure Levy (CIL) or Section 106 money, if appropriate.
- The long-term maintenance of the PRow will likely remain with Norfolk County Council. However, discussions will need to be had during the project development stage as to which body will be responsible for the footway alongside the A140. It is likely that this will either be Norfolk County Council or Horsford Parish Council.

e) Justification

This project addresses Objectives 3 and 5 of this Project Plan.

The aspiration of 'creating new country walks' is one that occurs in the emerging Horsford Neighbourhood Plan, meaning that this is an issue that local residents treat as being important.

Improved connectivity will make the surrounding countryside more accessible and more residents will benefit from the recreational opportunities that are presented.

As such, the project is an important component in achieving a wider network of green infrastructure to serve the communities in the area.

Project 8: Hevingham Park - Site Enhancements

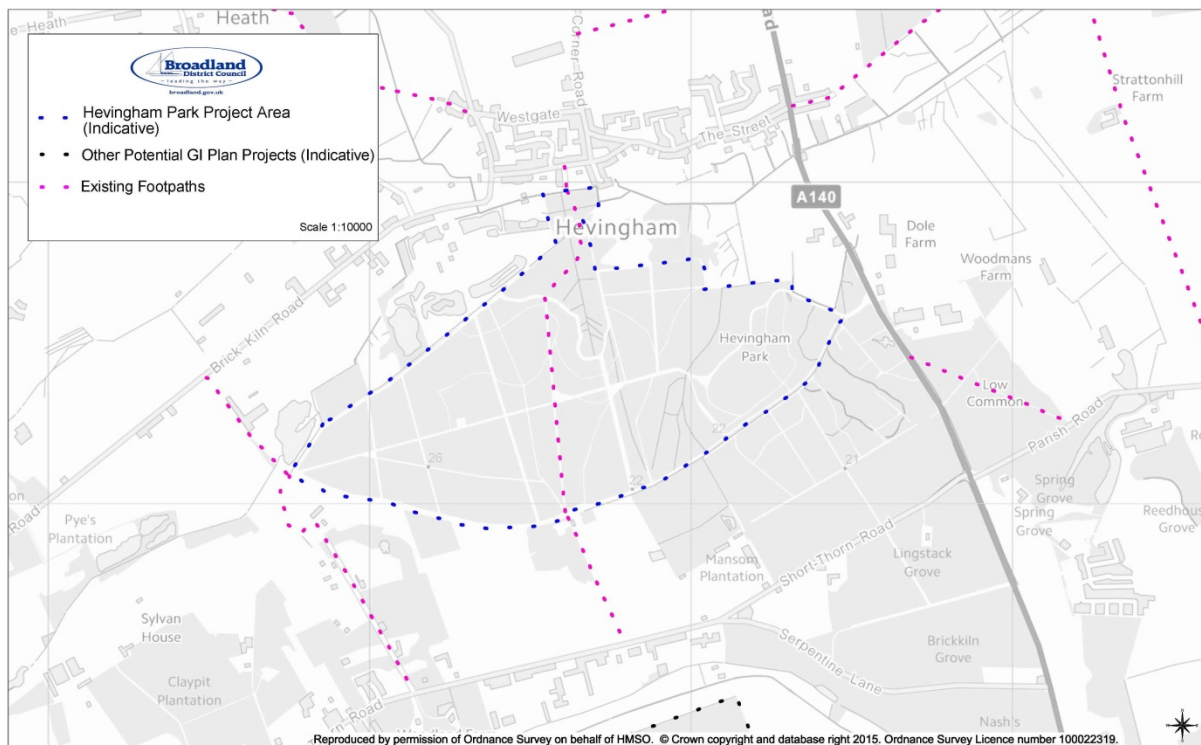
a) Location

Hevingham Park is located in the parish of Hevingham and is bordered by the A140 Cromer Road to the east, Brick Kiln Road to the north and Short-Thorn Road to the south. The site is a 91ha, mainly coniferous woodland under the ownership of the Forestry Commission, which is designated as open access land under the Countryside and Rights of Way Act. There are two substantial areas where felling has occurred, to the south and to the west of the site.

Much of the site is designated ancient woodland and it is one of the largest of such examples in the county (although it underwent extensive replanting in the twentieth century). According to Norfolk Heritage Explorer, the site (which has been a woodland since the medieval period) features natural ponds and 'pingos' (hollows formed during the last ice age). In medieval times these features may have been adapted for use as a deer farm and a rabbit warren, associated with the former bishop's palace, where Park Farm now stands. There is also a large bank and ditch marking the parish boundary and other internal boundaries marked by banks and ditches.

The site includes areas of semi-natural broadleaved woodland, planted broadleaved woodland, planted coniferous and mixed woodland. The eastern and northern parts have a rich ground flora with many ancient woodland indicator species.

The site is also listed as a County Wildlife Site. Vehicular access is currently via a small car park off of the A140. There are also pedestrian access points via Public Rights of Way which enter the site from the north and the south.



b) Description

This project aims to enhance and promote accessibility to and within the site, improving its potential as a key recreational asset for local communities.

The site is currently well-hidden and not particularly promoted as a recreational asset. The park is not signposted from either of the tracks to the north or to the south and neither is it obvious that these tracks are in fact public rights-of-way. The access from the north is also very poor, with boggy ground and copious felled trees which lie in situ. It is also difficult, at points, to discern the main path within this area of the site, there being no waymarking within the woodland. In addition, the car park off of the A140 is small and very easy to miss, with space for only a small number of vehicles.

The woodland is not situated near to any significant settlements. It lies adjacent to the village of Hevingham (with a population of 1,260, as reported by the 2011 Census) and it is anticipated that the site sees the most usage from this community. The nearest larger settlements are Horsford and Aylsham (each 4 miles away, by road), although these locations are well served by nearer G.I. assets of a similar (if not greater) scale. However, Hevingham Park is very well placed to serve the large number of villages that lie along the east of the A140 in this location, such as Buxton, Stratton Strawless, Waterloo, Hainford, Frettenham and Newton St. Faith.



Hevingham Park – main ride (PRoW) running north-south

There is potential to develop and better promote the site as a recreational asset for the benefit of the wider catchment area, with waymarking where appropriate. Remedial work would also need to be carried out on parts of the site, particularly the area to the north where there are current drainage issues and where a large amount of dead wood would need to be cleared.

The ecological value of the site is unknown at the current time, although its listing as a County Wildlife Site indicates that it has a degree of biodiversity value. An ecological survey would be required in order to make recommendations for appropriate habitat management on the site.

The aforementioned heritage and geological value relating to the site means there is potential for interpretation material at specific locations throughout the woods, bringing an added attraction to the visitor experience.

In summary, the enhancements to be sought at Hevingham Park include:

- Improved signage at the vehicular and pedestrian entrances to the site, and waymarking on the network of paths and tracks throughout the site.
- Improving the condition of footpaths and tracks throughout the site, where necessary, with specific attention being given to the poorly drained area to the north of the site. Scrub and deadwood clearance also to be undertaken in this area.
- Ecological surveying to be undertaken to make recommendations for managing the biodiversity of the site, alongside its recreational function.
- Interpretation material to be installed at specific locations to highlight points of interest relating to wildlife, heritage and geodiversity.
- Explore opportunities to enhance and expand the car park off of Cromer Road.
- Promotion of site within nearby communities via promotional literature, signage and enhancements to connecting footpaths, where applicable.



Hevingham Park – PRow, northern end of site

c) Opportunities

There is also the opportunity to create footpath links to Hevingham Park from the north of Horsford Woods (see Project 6). This involves identifying and developing a connection between the northern edge of Horsford Woods and Short-Thorn Road. If such a connection were made, then this would further develop strategic green corridor connectivity between Hellesdon, Drayton/Thorpe Marriott, Horsford and Hevingham.

d) Risks

- In order for the project to go ahead, there will need to be agreement from the Forestry Commission for these particular enhancements to be made.
- The project is reliant on sufficient funding being available for its completion.
- The continued maintenance of the site will need to be ensured and facilitated during the project development stage. It is anticipated that this will continue under the auspices of the Forestry Commission.

e) Justification

This project addresses Objectives 2, 3, 4 and 5 of this Project Plan.

The location and project also fits within the strategic GNIP ambition of developing and enhancing the 'North West Forest and Heaths' (GIP8.1), with Hevingham Park constituting a key block of woodland green infrastructure that follows a corridor of similar sites to the south, including Drayton Drewray, Felthorpe Common and Horsford Woods. The green connectivity between this site and settlements to the south also helps to achieve the GNIP project, 'Hevingham to Thorpe Marriott Secondary Corridor' (GIS6).

Although there is no significant development currently planned within the immediate vicinity of Hevingham, the woodland plays an important role in providing accessible, natural greenspace of a substantial size in this more rural part of west Broadland. The site has the potential to serve more residents of nearby towns and villages, some of which will be experiencing future growth, and it also provides an alternative recreation asset to the nearby and more environmentally sensitive Buxton Heath (a designated SAC and SSSI).

The project therefore forms a key element in the development of an enhanced green infrastructure network to serve communities in this part of the district.

Project 9: Great Wood, Haveringland – Site Enhancements

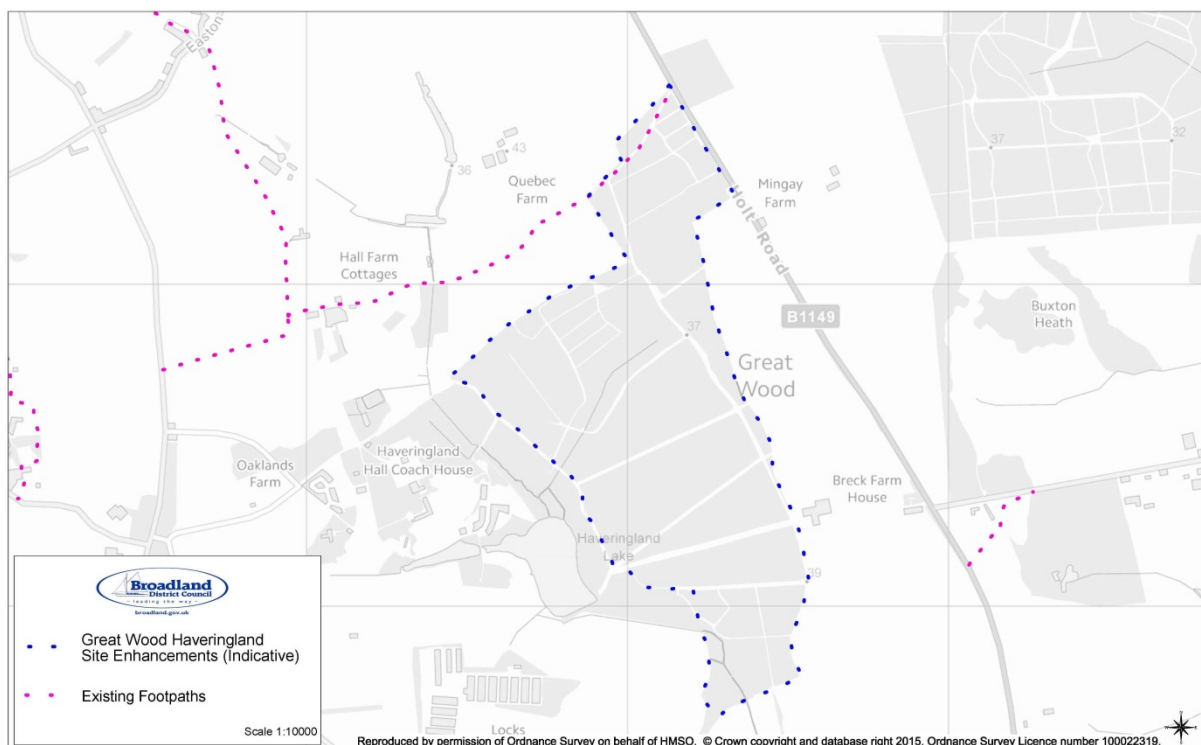
a) Location

This project is centred on the woodland site known as Great Wood, located to the west of Holt Road in the parish of Haveringland. The site comprises approximately 104ha of mixed woodland (mainly coniferous), with a moderate cleared area to the south west. The site is managed by the Forestry Commission and the majority is in freehold ownership of this body. The western fringe of the wood is leased by the Forestry Commission from a private landowner.

There is a network of rides and tracks that traverse the site, including one small stretch of PRoW which runs east-west across the northern tip of the woods. There is open access to the public within the woodland under the Countryside and Rights of Way (CRoW) Act.

The woodland is designated as ancient woodland (amongst the largest examples within the county) and, according to the Norfolk Heritage Explorer website, it is the site of a probable medieval and Tudor deer park. In a publication from 1736, there is reference to a brick 'Temple or Pleasure House' as a landscape feature on the site.

Lying to the west of the wood is Haveringland Hall Country Park, a private caravan park occupying the site of the former Haveringland Hall, which was demolished in 1946. Lying to the south of the caravan park and abutting the western edge of the woodland is Haveringland Lake. The lake and the western fringe of the wood are designated as a County Wildlife Site.



b) Description

This project seeks to make enhancements to Great Wood in order to make it more accessible and appealing to local communities as an area for recreation as well as increasing the biodiversity value of the site.

The site is not accessible by foot from nearby, substantial centres of population (Aylsham, Horsford and Reepham are all four miles away by road), although it is immediately surrounded by much smaller settlements such as Haveringland, Eastgate and Brandiston. By and large, it is expected that most users of the site do and will continue to drive to and park at the woods. Currently this can be achieved by parking at a small entrance to the woodland off of the Holt Road, at the northern tip of the site. There are no signs here to indicate that this is publicly accessible woodland, nor that this

location currently acts as the most suitable place for visitors to park.



Great Wood, Haveringland – main track leading into site

As mentioned above, the public has open access to the site under the CROW Act. A Public Right of Way extends west from the car park at the north of the site and then quickly exits the woodland. The remainder of the site is covered by a network of tracks and rides by which it is possible to undertake a circular walk around the wood, although there is currently no waymarking on the site. Most of the tracks are in good condition, formed as they are by compacted hoggins or concrete. However, to form a complete circular walk around the site, certain rides which are currently overgrown would need to be made more accessible, particularly in the north of the woods.

The site includes a relatively large, cleared area (approx. 8ha) which is concentrated in the south west corner, near to Haveringland

Lake. Although this may have originally been cleared to create a heathland habitat on the site, it is currently over-run with bracken and would need extensive management to restore it to heathland.

Again, as already stated, much of the site is ancient woodland (although it was extensively replanted with conifers in the twentieth century) and it was likely used as a medieval and Tudor deer park. There is therefore a degree of local heritage associated with the site, not least due to the proximity and association of the woods with the aforementioned Haveringland Hall (and its previous medieval and tudor iterations). This, along with the biodiversity value and potential, means that the site lends itself well to interpretation material and signage.

Within Great Wood, potential enhancements therefore include the following elements:

- Improvements to footpaths and rides within the site, where necessary – particularly in the north of the woods, in order to create circular routes.
- Installation of signage at the site entrance and waymarking and interpretation panels, where appropriate, throughout the woodland.
- Ecological surveying to be undertaken to make recommendations for improving and managing the biodiversity of the site, alongside its recreational function.
- Explore opportunities to enhance and expand the car park off of Cromer Road.
- Promotion of site within nearby communities via promotional literature, signage and enhancements to connecting footpaths, where applicable.

c) Opportunities

There may be opportunities to access the site from the west, via Haveringland Hall, subject to the agreement of landowners. Such access could bring visitors straight to the main woodland site and possibly provide an alternative car park to the limited area located off of Holt Road.

d) Risks

- In order for the project to go ahead, there will need to be agreement from the Forestry Commission for these particular enhancements to be made.
- The project is reliant on sufficient funding being available for its completion.
- The continued maintenance of the site will need to be ensured and facilitated during the project development stage. It is anticipated that this will continue under the auspices of the Forestry Commission.

e) Justification

This project addresses Objectives 2, 4 and 5 of this Project Plan.

The location and project also fits within the strategic GNIP ambition of developing and enhancing the 'North West Forest and Heaths' (GIP8.1), with Great Wood, Haveringland constituting a key block of woodland green infrastructure in this part of the district.

The project also constitutes a key element of two of the GNGB Secondary Corridors projects: GNIP project, S2 - Lenwade to Hevingham and S3 - Haveringland to Cawston.



Great Wood, Haveringland

Although there is no significant development within the immediate vicinity of Haveringland, the woodland plays an important role in providing accessible, natural greenspace of a substantial size in this more rural part of west Broadland. The site has the potential to serve more residents of nearby towns and villages, some of which will be experiencing future growth, and it also provides an alternative recreation asset to the adjacent and more environmentally sensitive Buxton Heath (a designated SAC and SSSI).

As such, the project forms a key element in the development of an enhanced green infrastructure network to serve communities in this part of the district.

Project 10: Marriott's Way Circular Walks

a) Location

This project, under the auspices of the wider Marriott's Way Heritage Trail initiative (hosted by Norfolk County Council), involves the promotion of a series of circular walks that use different sections of the Marriott's Way as a basis for their routes.

The Marriott's Way is a 26 mile footpath, bridleway and cycle route, which follows the routes of two disused railway lines, and runs between the Aylsham and Norwich, via Reepham. It is also a designated County Wildlife Site.

The walks offer opportunities to link with nearby Public Rights of Way, enabling circular routes to be developed. The walks (within Broadland district) are in the following locations:

- i) Attlebridge Wood
- ii) Aylsham (long and short version routes)
- iii) Great Witchingham, Themelthorpe & Cawston
- iv) Reepham & Whitwell
- v) Reepham & Cawston
- vi) Swannington

In addition, Broadland District Council has identified two further circular walks that include portions of the Marriott's Way. Whilst they do not form part of the Heritage Trail initiative, the District Council feels there is merit in their inclusion as part of this plan. These are located in:

- i) Lenwade & Swannington
- ii) Cawston & Cawston Heath

b) Description

The walking routes that have been identified each take in a portion of the Marriott's Way and incorporate an existing car park along the route. They range in distance between two and twelve and a half miles and provide the basis for attractive, accessible recreation opportunities throughout the project area.

The Marriott's Way is already a well-promoted recreation asset for residents and visitors to the area. The walks will make use of its reputation and its facilities (i.e. car parking), whilst promoting excursions into the countryside at the aforementioned locations, offering walkers a choice of convenient, circular routes. These incorporate Public Rights of Way and (to a lesser degree) minor roads and many of the walks include particular areas of interest, including registered commons, woodlands, villages and heritage features.

The Marriott's Way Heritage Trail initiative aims to promote and develop these walks via promotional literature (leaflets etc.) and small-scale waymarking.

However, with additional resources, the promotion and development of these circular walks could include:

- Footpath improvements, where necessary (e.g. surfacing, drainage etc.)
- More extensive waymarking of routes, using consistent branding
- Boards installed at car parks, showing circular walks
- Car park improvements, where necessary
- Exploring opportunities to increase connectivity between grassland areas and for woodland management.

c) Opportunities

The combination of both current resources from the Marriott's Way Heritage Trail project and potential future resources (via, for example, CIL or s106 contributions) should maximise the benefits of this circular walks project. Such is the nature of the project that additional enhancements could potentially be made to the various routes as and when resources become available.

d) Risks

- The delivery of the circular routes is reliant on sufficient funding being available for their completion. HLF funding, through the Marriott's Way Heritage Trail project, will go some way toward the delivery of these routes. However, additional resources could enable further enhancements and promotion as well as the two further routes proposed by Broadland District Council.
- The two additional routes proposed by Broadland District Council have been compiled following research using G.I.S. and aerial photography, as well as the examination of existing, promoted walks in these areas. Full ground surveying and route exploration will therefore be required.

e) Justification

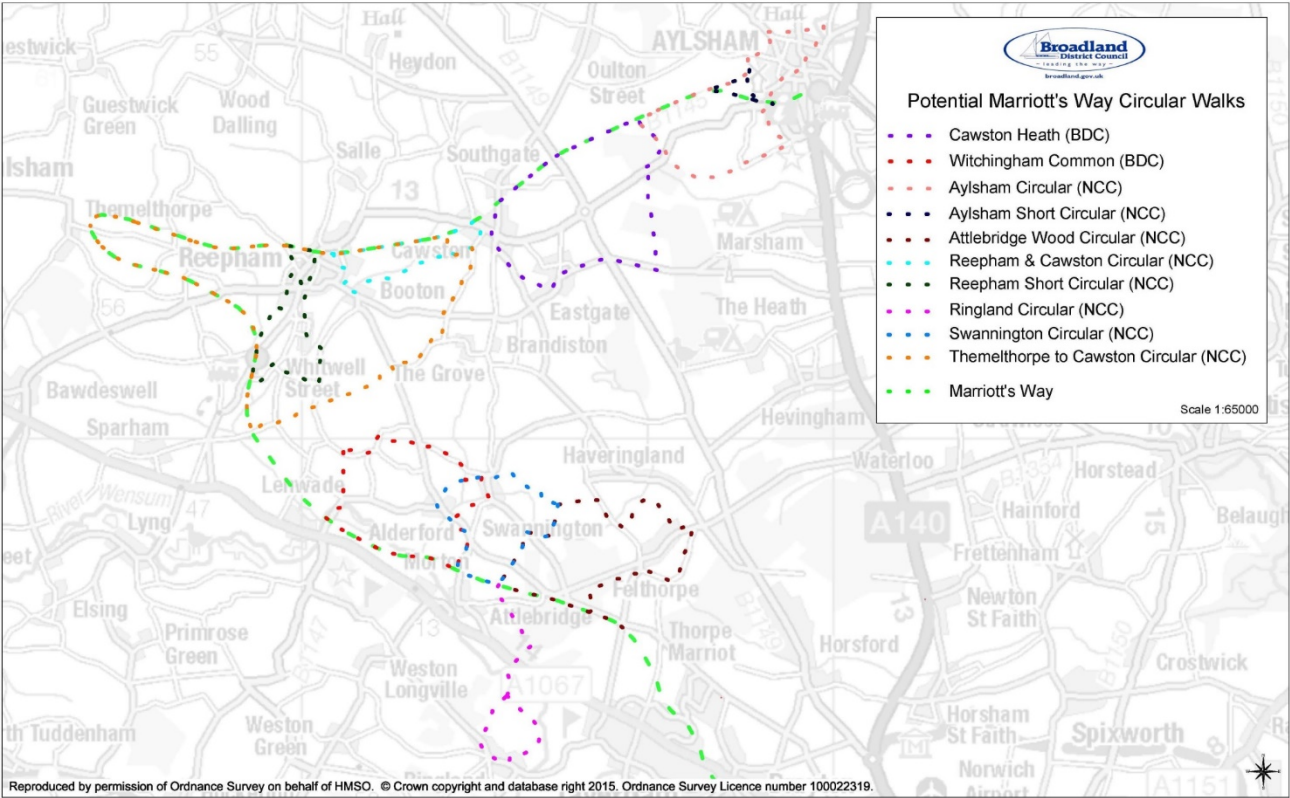
This project addresses Objectives 4 and 5 of this Project Plan.

The project also helps to achieve one of the main ambitions of the Marriott's Way Improvement & Delivery Plan 2015-2025, which is to 'create and promote new circular walks that use Marriott's Way for part of their length.'

In addition, and as discussed elsewhere in the document, significant residential development is occurring in the area, leading to increased pressure on the countryside. Improved connectivity will make the surrounding countryside more accessible and more residents will benefit from the recreational opportunities that are presented.

The scheme therefore forms an important element in the development of an enhanced network of green infrastructure to serve local communities in this part of the district.

MARRIOTT’S WAY CIRCULAR WALKS



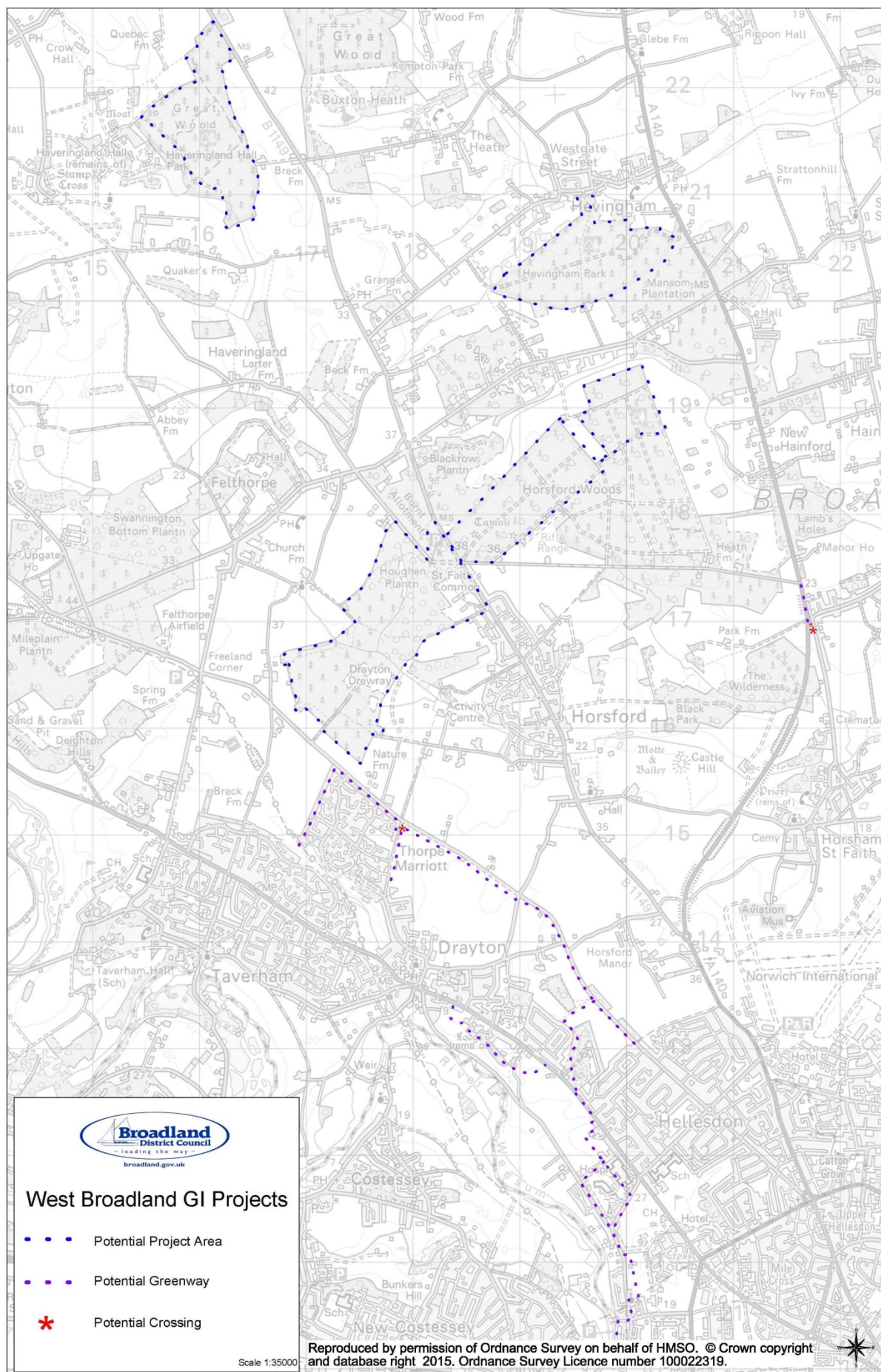
APPENDIX 1: PROJECT SUMMARY

Project	Wider Strategic Fit	Location	Project Description	Stakeholders	Est. Cost (£)	Possible Funding Streams	Provisional Timescale	
1	Thorpe Marriott Greenway	GNIP Project GIS6 - Hevingham to Thorpe Marriott Secondary Corridor Drayton Neighbourhood Plan Policy 7: Improved Walking & Cycling Routes	Tree belt buffers to north, north-east and west of Thorpe Marriott	Develop footpath within tree belts, connecting walkers from Marriott's Way to route north over NDR, and providing circular route for local residents.	Drayton PC; Taverham PC; Local residents;	100,000	S106; CIL;	2018-19
2	Drayton to Horsford Greenway	GNIP Project GIP8.1 - North west Forest & Heaths Drayton Neighbourhood Plan project - 'GI Improvements at Drayton Drewray, Canham's Hill and Drayton Wood' GNIP Project GIS6 - Hevingham to Thorpe Marriott Secondary Corridor	Green corridor, taking in: Drayton Wood CWS; Canhams Hill CWS; Land south of Reepham Road, between Hellesdon and Thorpe Marriott; Footpaths associated with Manor Park development, off Hall Lane; New safe crossing measures over Reepham Road; Public Right of Way and new green bridge over NDR;	i) Deliver new greenway connections at Canham's Hill and along Reepham Road in order to deliver green corridor linking Drayton Wood to new green bridge over the NDR; ii) Produce and deliver a conservation management plan for Canham's Hill CWS; iii) Produce and deliver conservation management plan for Drayton Wood CWS; iv) Enhance current connections, where appropriate (e.g. surfacing, drainage etc); v) Install safe crossing measures at Reepham/School Road junction; vi) Install waymarking throughout greenway, incl. map boards at strategic locations; vii) Raise awareness of greenway using promotional literature;	Drayton PC; Norfolk Wildlife Trust; Norfolk County Council; Developer; Landowner(s);	300,000	S106; CIL; Delivery through development;	2018-21
3	Hellesdon to Drayton Greenway	GNIP Project GIP8.1 - North west Forest & Heaths Hellesdon Neighbourhood Plan Policy 1: The Hellesdon Green Grid	Green corridor, taking in: Hellesdon Bridge; Former Golf Course site; Hospital site; Carrowbreck;	i) Deliver new greenway connections between Clovelly Close, Hellesdon and Golf Course development; and north through Hellesdon Hospital to link to Carrowbreck and Drayton High Road; ii) Enhance current green infrastructure, where appropriate (e.g. clearance, surfacing, drainage, planting etc.); iii) Install waymarking throughout greenway, incl. map boards at strategic locations; iv) Raise awareness of greenway using promotional literature;	Hellesdon PC; Landowners; Developers;	175,000	S106; CIL; Delivery through development;	2018-21
4	South Drayton Greenway	Drayton Neighbourhood Plan Policy 7 - Walking & Cycling Routes	Green space between Drayton High Road and Low Rd, Drayton, stretching from Lodge Breck in west to former David Rice Hospital site in the east	i) Development of greenway, linking Lodge Breck/Fairview Close to Drayton High Road further east, taking in Bloods Dale and former David Rice Hospital site; ii) Installation of waymarking, including map boards at key locations; iii) Consider installation of interpretation board at Bloods Dale; iv) Enhancement of biodiversity and access at former David Rice Hospital site; iv) Raise awareness of greenway using promotional literature;	Drayton PC; Norfolk Wildlife Trust; NCC Historic Environment Service; Landowners; Developers;	100,000	S106; CIL; Delivery through development; Heritage Lottery Fund;	2018-21

5	Felthorpe Common / Drayton Drewray - Site Enhancements	GNIP Project GIP8.1 - North west Forest & Heaths Drayton Neighbourhood Plan project - 'GI Improvements at Drayton Drewray, Canham's Hill and Drayton Wood'	Area of woodland coverage (approx. 149ha) between Holt Rd and Reepham Rd, west of Horsford. Incorporates St. Faiths Common, Houghen Plantation, Felthorpe Common, Whinny Hills, Dole Plantation and Drayton Drewray. Area incorporates several pockets of restored heathland / grassland.	<p>i) Improved public access within the overall site, including improvements to footpaths, installation of waymarking, signage and promoted circular routes;</p> <p>ii) Connect existing heathland/grassland pockets within area via wide rides;</p> <p>iii) Consider introduction of livestock for management purposes;</p> <p>iv) Consider developing further heathland/grassland pockets;</p> <p>v) Improved car parking facilities off Haveringland Rd;</p> <p>vi) Consider development of small, new car park at southern entrance to Drayton Drewray;</p> <p>vii) Additional ecological surveys and co-ordinated wildlife/recreational management across sites of different ownership within project area;</p> <p>viii) Improvements to pedestrian connections leading to the site from nearby settlements, where necessary, including signage and map boards.</p> <p>viii) Promotion of site locally via promotional literature;</p>	Drayton PC; Felthorpe PC; Horsford PC; NCC Natural Environment Team; Norfolk Wildlife Trust; Landowners;	500,000	S106; CIL; NE Countryside Stewardship Grants;	2019-2024
6	Horsford Heath / Woods - Site Enhancements	GNIP Project GIP8.1 - North west Forest & Heaths GNIP Project GIS6 - Hevingham to Thorpe Marriott Secondary Corridor	Horsford Heath/Woods (approx. 267ha)	<p>i) Improved public access incl. improvements to footpaths/rides and installation of waymarking / interpretation panels;</p> <p>ii) Ecological survey to establish detailed recommendations for ongoing biodiversity management of the site;</p> <p>iii) Improved car parking facilities to south west of site;</p> <p>iv) Raise awareness of site using promotional literature and signage within the village;</p>	Horsford PC; Forestry Commission; Norfolk Wildlife Trust; NCC Historic Environment Service; Landowners;	200,000	S106; CIL;	2019-2022
7	East Horsford - Connectivity & Circular Walk	GNIP Project GIS6 - Hevingham to Thorpe Marriott Secondary Corridor	East of Horsford village (safety measures on A140)	<p>i) Deliver new footway connection along western side of A140, linking junction of PRoW with Green Lane;</p> <p>ii) Enhance current PRoW, stretching from Holt Rd, Horsford to A140, where applicable;</p> <p>iii) Install waymarking at key locations;</p> <p>iv) Install safe crossing measures across A140 to link PRoW with Newton Street, Newton St. Faith;</p> <p>v) Raise awareness of circular walk using promotional literature and signage within village;</p>	Horsford PC; Horsham & Newton St Faith PC; Landowners; NCC Highways;	350,000	S106; CIL;	2020-2022
8	Hevingham Park - Site Enhancements	GNIP Project GIP8.1 - North west Forest & Heaths GNIP Project GIS6 - Hevingham to Thorpe Marriott Secondary Corridor	Hevingham Park	<p>i) Improved signage at vehicular and pedestrian entrances and waymarking on network of paths/tracks throughout site;</p> <p>ii) Improve condition of paths/tracks , where necessary, with specific attention given to poorly drained area to north of site;</p> <p>iii) Ecological survey to be undertaken to make recommendations for managing biodiversity;</p> <p>iv) Install interpretation material at specific locations, relating to wildlife, heritage and geodiversity;</p> <p>v) Explore opportunities to enhance and expand the car park off of Cromer Road;</p> <p>vi) Promotion of site locally via promotional literature;</p>	Hevingham PC; Stratton Strawless PC; Forestry Commission; NCC Historic Environment Service; Norfolk Wildlife Trust;	200,000	S106; CIL;	2020-2022
9	Haveringland - Great Wood	GNIP Project GIP8.1 - North west Forest & Heaths GNIP Project S2 - Lenwade to Hevingham Secondary Corridor GNIP Project S3 - Haveringland to Cawston Secondary Corridor	Great Wood, Haveringland	<p>i) Improvements to footpaths/rides within site in order to create circular routes;</p> <p>ii) Installation of signage at site entrance and waymarking/interpretation throughout woodland;</p> <p>iii) Ecological survey to make recommendations for managing biodiversity of site;</p> <p>iv) Explore opportunities to enhance and expand car park off Cromer Rd;</p> <p>v) Promotion of site locally via promotional literature, signage and enhancements to connecting footpaths, where applicable;</p>	Forestry Commission; Norfolk Wildlife Trust; NCC Historic Environment Service;	175,000	S106; CIL;	2020-2022

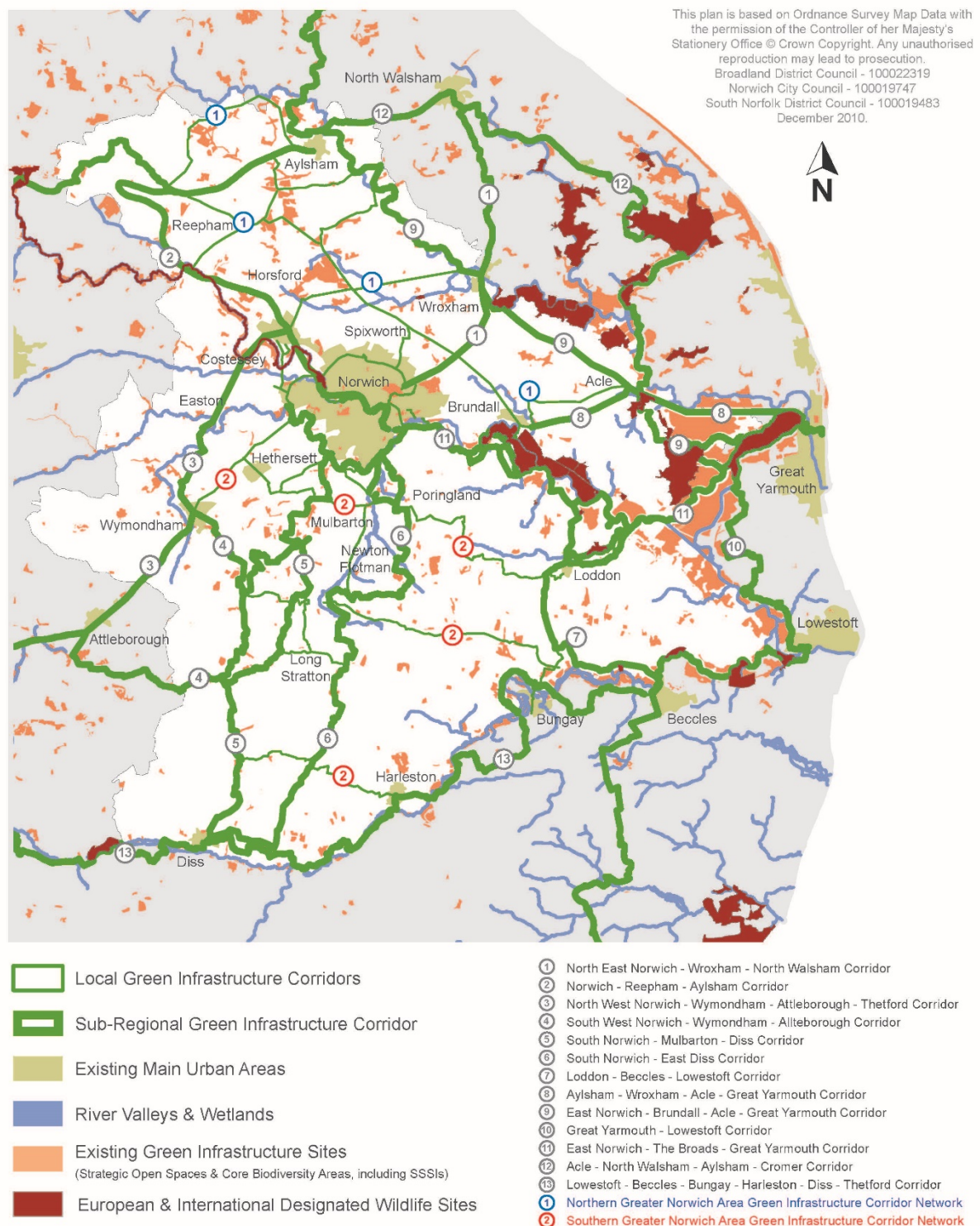
10	Marriott's Way Circular Walks	Marriott's Way Improvement & Delivery Plan 2015-25						
		GNIP Project S2 - Lenwade to Hevingham Secondary Corridor	Development of circular walks off of Marriott's Way, in following locations:	Marriott's Way Heritage Trail initiative aims to promote and develop these walks (i-v) via promotional literature and small-scale waymarking. BDC to promote and develop walks vi and vii.				
		GNIP Project S3 - Haveringland to Cawston Secondary Corridor	i) Attlebridge Wood; Aylsham (long and short version routes);	Heritage Trail initiative aims to develop walks via promotional literature and small-scale waymarking.	NCC Natural Environment Team;		S106;	
		GNIP Project S4 - Broadland east to west Secondary Corridor via Marsham	ii) Great Witchingham, Themelthorpe & Cawston; iii) Reepham & Whitwell; iv) Reepham & Cawston; v) Swannington;	Additional enhancements, via inclusion in G.I. Plan, could include:	Marriott's Way Heritage Trail Project;	150,000	CIL; Parish Councils;	2018-2021
		GNIP Project S5 - Buxton Heath to Aylsham Secondary Corridor	vi) Lenwade & Swannington; vii) Cawston & Cawston Heath;	i) Footpath improvements, where necessary (e.g. surfacing, drainage etc.); ii) More extensive waymarking of routes; Boards installed at car parks, showing circular walks; iii) Car park improvements, where necessary;				
		GNIP Project GIP8.1 - North west Forest & Heaths						

APPENDIX 2: PROJECT LOCATION MAP (excl. Project 10 - Marriott's Way Circular Walks)



Proposed Green Infrastructure Network for the Greater Norwich Area

Source: Greater Norwich Green Infrastructure Study 2007.
The Green Infrastructure opportunities on this map are indicative only. The map illustrates information about opportunities at a strategic level and does not indicate a constraint on development.



West Broadland Green Infrastructure Project Plan - Consultation Responses

ID Ref.	Organisation	Section	Comm. Ref.	Comments	BDC Response	Amendment
1	Broadland District Council	Project 10: Marriott's Way Circular Walks	1	As Tourism Officer at Broadland District Council, I would be in support of plans to produce circular walks around the Marriott's Way route. I believe this will make the route more appealing for those looking for shorter leisurely walks that they can do more frequently, and this is especially useful for encouraging visitors to make use of business services in the surrounding villages. Broadland has already produced a variety of literature promoting walks in some of the villages mentioned such as Cawston, Reepham, Aylsham & Swannington. It would be useful if these could be considered in the planning and improvement of these green spaces.	Response noted. When circular walk projects develop, ensure liaison with BDC Tourism Officer regarding promotional literature and links with nearby recreation opportunities.	
2	Horsford Parish Council	General	1	The plan was discussed by the parish Council last evening and they are fully supportive of the plan and in particular those projects that involve Horsford and connectivity with adjacent parishes. They are also appreciative of the consultations given to members of the Neighbourhood Plan steering group so that these ideas could be worked into the plan.	Support noted. No action required.	
3	Norfolk Wildlife Trust	General	1	We welcome the development of this project plan and fully support the aims and objectives of the plan. The project plan represents a vital next step in translating the aims of the Greater Norwich GI Strategy into effective local GI projects that will enhance the biodiversity value of the area whilst improving both ecological connectivity and access to the countryside. It is good to see that County Wildlife Sites (CWS) are recognised as being an important part of the GI network. However, mention of CWS is not consistent and it would be good to make clear for each project, which sites are CWS. We have noted sites in our response that have not been flagged up as CWS. In this context, it may be useful to include a map of protected sites in the area, as has been done in the emerging Horsford Neighbourhood Plan. We would like to see NWT added to the list of stakeholders for all projects involving CWS, plus David Rice Hospital site, where we have engaged with the owner on ecology issues over a number of years. We are happy for it to be explained in a footnote that this relates solely to our role in advising on CWS. NWT are pleased to have been involved in development of these proposals and look forward to working with Broadland District Council as individual projects are taken forward in the future.	Support noted. Clarify which sites are CWS and add this to document, where missing. A map of the area, showing the various environmental designations, has been considered but it is felt that it would suffer from a lack of clarity at the scale and size of which the document is formatted. Instead, a reference will be added to the section detailing the 'Development Management DPD 2015' on page 11, highlighting where the Local Plan Policies Map can be viewed. NWT are currently on the stakeholder list, but BDC will note the particular interest in the former David Rice Hospital site.	Yes
		Project 2: Drayton to Horsford Greenway	2	We fully support proposals to enhance and link Canham's Hill and Drayton Wood CWS. Reference is made to ecological restoration of Canham's Hill CWS, within the project description and it would be good to have a conservation management plan for Canham's Wood, included as part of the project.	Include the creation of a conservation management plan for Canham's Hill as part of the list of project objectives.	Yes
		Project 3: Hellesdon to Drayton Greenway	3	Pleased to see that this incorporates ecological enhancements. There would be an opportunity for ecological enhancement within Drayton Wood CWS in connection with project 2 and 3 and this should be explored with landowner. In relation to this project, there is an opportunity for green infrastructure opportunities related to the David Rice Hospital site (as described in project 4) to provide an alternative route down to Hellesdon Low Road, if proposals in relation to the golf course are not forthcoming. The David Rice Hospital Site is an important ecological asset for the area and it would be good for ecological enhancement of this area to be included within GI proposals for West Broadland. The hospital site has planning permission, with conditions for protection of the remainder of the site, which is of CWS value and management for biodiversity and access.	Response noted. The former David Rice Hospital site is particularly relevant to Project 4 within the West Broadland GI Project Plan.	
		Project 4: South Drayton Greenway	4	We are pleased to see that this incorporates green infrastructure opportunities related to the David Rice Hospital site. The hospital site has planning permission with conditions for protection of remainder of the site, which is of CWS value and management for biodiversity and access. It is important to take account of the fact that the David Rice site is not suitable for tree planting, but needs to be looked at principally as a grassland restoration site	Reference, as part of Project 4, the ecological importance of the David Rice site and the fact that Norfolk Wildlife Trust has an interest in its ongoing ecological management and that it should be considered primarily as a grassland restoration site.	Yes
		Project 5: Felthorpe Common / Drayton Drewray - Site Enhancements	5	We fully support the inclusion of these projects as they will provide a substantial area of semi-natural habitat with public access. It should be recognised that Houghen Plantation and Drayton Drewray currently have minimal public access and increasing access to these sites needs to be done with sensitivity, as these are high quality sites. As the project plans develop, NWT is keen to maintain involvement with regard to detail of footpath routes and mitigation and with proposals for management of this area. It would be undesirable for Drayton Drewray to become a place where people parked their cars and walked their dogs in high numbers. In addition to St Faiths Common it would be good to graze Drayton Drewray as part of management of the site and access needs to not be an obstacle to this. Further surveys on these sites, including for reptiles and breeding birds would be useful.	Support noted. Reference the fact that this project would need to be developed with sensitivity to the high quality natural environment. Amend objective to 'Consider development of a new, small car park at southern entrance to Drayton Drewray, accessed via new roundabout on NDR. Include possibility of grazing on Drayton Drewray as part of objective two. Include reference to reptile and bird surveys on the various sites.	Yes

		Project 6: Horsford Heath / Horsford Woods - Site Enhancements	6	Horsford Heath & Woods are CWS and it would be good to reflect this in the project description, stressing the importance of some areas for wood lark, adder and marsh gentian. We are pleased to see proposals to increase connectivity of habitats which we fully support.	Support noted. Include the reference to CWS in the project description. Reference the importance of preserving/enhancing some areas for wood lark, adder and marsh gentian.	Yes
		Project 7: East Horsford - Connectivity & Circular Walk	7	Black Park and Castle Hill are both CWS and sit in a landscape rich in CWS, so increasing connectivity here would be a good aim.	Reference the proximity of Castle Hill CWS in the 'Location' section.	Yes
		Project 8: Hevingham Park - Site Enhancements	8	Hevingham Park is a large ancient woodland site with pingos, which is a CWS. It includes areas of semi-natural broadleaved woodland, planted broadleaved woodland, planted coniferous and mixed woodland. The eastern and northern parts have a rich ground flora with many ancient woodland indicator species.	Add these further descriptive details to the 'Location' section.	Yes
		Project 9: Great Wood, Haveringland - Site Enhancements	9	Great Wood is also very likely to be of CWS value, owing to ancient wood features and relict heath areas but has not been a priority to survey in the past as it is managed by FC. NWT would be happy to carry out an ecological survey Great Wood.	Noted that NWT have an interest in surveying the wood. BDC will raise this in any future project discussions with the Forestry Commission.	
		Project 10: Marriott's Way Circular Walks	10	The whole of Marriotts Way is designated as a CWS and forms a corridor of woodland and grassland habitats running through the district. Enhancement opportunities include increasing connectivity between grassland areas and management of woodland.	Add reference to Marriotts Way being a CWS. Include 'increasing connectivity between grassland areas' and 'management of woodland' as potential project objectives.	Yes
		Appendix 1: Project Summary	11	Biodiversity projects, as described above, should be added to the table of projects, i.e. Project 2: Produce and deliver conservation management plan for Canham's Hill CWS Project 3: Produce and deliver conservation management plan for Drayton Wood CWS Project 4: Enhancement of biodiversity and access in line with planning permission for David Rice Hospital Site	Response and suggestions noted. These elements will be added in to the respective project objectives.	Yes
4	Norfolk County Council	General	1	We are generally in support of the content of the plan but feel that more detail is required before any further consultation takes place. It seems that at this stage the plan is more conceptual than functional. We feel that a more co-ordinated approach between Broadland District Council and Norfolk County Council would be beneficial. It may be that in some cases work will be at a local level with parishes, but as a lot of the proposals revolve around creating more PROW, the surfacing and infrastructure on existing PROW and increased signage there is a need for NCC to be involved at an early stage. From our point of view there needs to be a clear direction as to what the new proposed routes will be, how these will be recorded (permissive, new PROW, adopted footway) and how these will be managed and by whom. For example many of the routes proposed are existing and a joined up approach would allow provision for things like signage to be consistent and planned. The proposals make no mention of Health and Wellbeing, this could be a key inclusion in the document. There is some merit in graphic justification of the proposals, especially to show the relationship between this document and the Greater Norwich Green Infrastructure Plan. However, overall we fully back the plan and the proposals contained within and look forward to a healthy working relationship between the two councils to take these proposals forward.	Support noted. The plan is simply intended to highlight potential project opportunities in this part of the district. This is noted in the 'Introduction', where it states, 'Further project development work will be required in each instance, as and when development opportunities arise'. BDC agrees that a co-ordinated approach is necessary for the development of these projects, hence the inclusion of NCC as a stakeholder at this early stage of identifying potential projects. It is anticipated that further discussions and partnership arrangements with NCC will be valuable in delivering many of these schemes. Reference will be made to potential impacts on health and wellbeing, in the 'Introduction' to the document.	Yes
		Methodology	2	Stakeholder Involvement - Landowners don't appear and they will be a vital part of the proposals if they are to progress. Neither is NCC highways, who should be involved at an early stage as there are plans to create new PROW links and links/crossings of the highway road network.	Landowners have been identified and contacted in the majority of cases, where details are known. There will be a need for continued liaison in order for any projects to progress. A reference to this fact will be added to Section 4.	Yes
		Project 7: East Horsford - Connectivity & Circular Walk	3	The second bullet point should read CIL or S106, not and/or.	Noted. This sentence will be amended.	Yes
5	CODE Development Planners Ltd on behalf of Drayton Farms Ltd / RG Carter Farms Ltd	Project 2: Drayton to Horsford Greenway	1	We fully support the objectives set out within the West Broadland Green Infrastructure Project Plan. Our client (Drayton Farms Limited) owns substantial areas of land in an area on which some projects may be appropriate in conjunction with future development. Drayton Farms Limited look forward to future discussions with Broadland District Council.	Support noted.	
6	Drayton Parish Council	General	1	The Parish Council discussed this issue at the delayed Parish Council meeting on 8th March 2018. The report was well received and the Parish Council wishes to support it in its entirety.	Support noted.	
7	Hevingham Parish Council	General	1	The Parish Council have no comments to make on the proposed plan.	Response noted.	
8	Felthorpe Parish Council	General	1	As these areas are privately owned areas Councillors felt that it would not be appropriate to comment.	Response noted.	

RESPONSE TO CONSULTATION ON THE HOUSING GREEN PAPER 'A NEW DEAL FOR SOCIAL HOUSING'

Portfolio Holder: Housing & Wellbeing

Wards Affected: All

1 SUMMARY

- 1.1 In the aftermath of the Grenfell Tower tragedy and following consultation events with those who live in social housing, a Green Paper has been produced to address these concerns. The social housing Green Paper 'A new deal for social housing' proposes fundamental reform to ensure social homes provide an essential, safe, well managed service for all those who need it.
- 1.2 The Green Paper consultation seeks views from a wide range of interested parties, including residents, landlords and lenders on making sure that social housing provides safe and secure homes that help people get on with their lives. The consultation is open to everyone.
- 1.3 The consultation opened on 14 August 2018 and will run until 6 November 2018. The Green Paper and the consultation document can be viewed at <https://www.gov.uk/government/consultations/a-new-deal-for-social-housing>

2 KEY DECISION

- 2.1 This is not a key decision and has not been published in the Forward Plan.

3 BACKGROUND

- 3.1 The Green Paper represents a shift in the state's approach to social housing and is divided into five parts:
- 3.2
 - Part 1: Ensuring homes are safe and decent
 - Part 2: Effective resolution of complaints
 - Part 3: Empowering residents and strengthening the Regulator
 - Part 4: Tackling stigma and celebrating thriving communities
 - Part 5: Expanding supply and supporting home ownership
- 3.3 Within Broadland District Council there are 6,052 properties that are classified as social housing and are in the hands of Housing Associations. Of these 5,569 are properties rented on Affordable Rent Tenure, Housing with Care, Sheltered Accommodation or General Needs rented below market level rents, with 483 being bought through schemes such as Shared Ownership,

Discounted Market Share and Shared Equity. This forms approximately 10 percent of all properties across Broadland. Currently we have 2,276 residents on our housing waiting list.

- 3.4 Broadland District Council owns just two properties which are used as temporary accommodation. All the social housing within Broadland is managed by Housing Associations such as Clarion, Orbit, Victory Housing Trust, Cotman, Saffron Housing Trust and Flagship.
- 3.5 A response to the Green Paper consultation is being compiled from input given by Broadland Officers and discussion with Housing Association staff. Input from South Norfolk District Council officers has also been requested.
- 3.6 The full response by Broadland District Council will be presented to the Portfolio Holder prior to submission on 6 November 2018. The Social Housing Green Paper and consultation document is attached at Appendix 1.

4 THE ISSUES

Part 1: Ensuring homes are safe and decent

- 4.1 Key questions focus on how can residents best be supported in working with landlords to ensure homes are safe.
- 4.2 As part of the consultation the Decent Homes Standard will be reviewed to consider if it demanding enough and delivers the right standards for social housing.
- 4.3 We have consulted with our Private Sector Leasing Manager and Housing Options Team Leaders on the most appropriate response to these questions.

Part 2: Effective resolution of complaints

- 4.4 Questions focus on giving residents a stronger voice to influence decisions and challenge their landlord to improve performance, supporting residents to make complaints and speeding up the complaints process.

Part 3: Empowering residents and strengthening the Regulator

- 4.5 A number of questions focus on key performance indicators and the performance of landlords in areas such as keeping properties in good repair, maintaining the safety of buildings, effective handling of complaints, engagement with residents; and responsible neighbourhood management.

- 4.6 As a non-stock holding district council, Broadland have limited experience of Part 2 and Part 3. We have consulted with our Housing Team Leaders and will gather views from Housing Association staff for a clearer indication of the issues this raises.

Part 4: Tackling stigma and celebrating thriving communities

- 4.7 Questions focus on community development, how to develop good neighbourhood management and tackle anti-social behaviour, through performance indicators and planning.
- 4.8 We have consulted with officers within Broadland District Council, including Housing Options, Housing Development, and Community Safety on the response to these questions.

Part 5: Expanding supply and supporting home ownership

- 4.9 Questions concern the current arrangements for grant funding and how to support funding for future social housing plans.
- 4.10 We have consulted with officers within Broadland District Council, including Housing Enabling, Planning and Benefits on the response to these questions.

5 PROPOSED ACTION

- 5.1 It is proposed that Broadland District Council will submit a response to the Social Housing Green Paper consultation, based on our experience as a predominantly non-stock holding authority. We will seek the views of Housing colleagues from South Norfolk District Council. The final draft version will be discussed with the Portfolio Holder prior to submission. The views of the Place Shaping Panel are also sought.

6 RESOURCE IMPLICATIONS

- 6.1 There are no known resource implications arising from this report.

7 LEGAL IMPLICATIONS

- 7.1 There are no legal implications arising from this report.

8 RECOMMENDATION

- 8.1 The Place Shaping Panel is requested to note the report and approve the method of submission and suggest any comments to be submitted as part of the consultation process.

Matthew Cross
Deputy Chief Executive

Background Papers

None

For further information on this report call Sarah Oldfield on (01603) 430121 or e-mail sarah.oldfield@broadland.gov.uk



Ministry of Housing,
Communities &
Local Government

A new deal for social housing

Cm 9671

A new deal for social housing

Presented to Parliament

by the Secretary of State for Housing, Communities and Local
Government by Command of Her Majesty

August 2018



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Foreword from the Prime Minister

The homes we live in are so much more than bricks and mortar. They're where we raise our families, put down roots and build communities.

Everyone in this country deserves not just a roof over their head but a safe, secure and affordable place to call their own – and social housing has a vital role to play in making sure they do.

It's not just about creating a safety net to prevent homelessness. By providing homes based on individuals' needs rather than solely their ability to pay, social housing helps to keep neighbourhoods diverse and integrated. And it provides the stability people need to build lives and strong communities.

Nearly one in five of English homes are owned by housing associations or local councils, providing a place to live for millions of people.

Yet, as the 8,000 conversations and submissions behind this Green Paper show, many people living in England's four million social homes feel ignored and stigmatised, too often treated with a lack of respect by landlords who appear remote, unaccountable and uninterested in meeting their needs.

It's a situation the residents of Grenfell Tower have spoken about in powerful terms, not just in the wake of last year's tragedy but also in the months and years before – only for their voices too often to go unheard.

As this Green Paper shows, this was not an isolated case. If we are to truly make this a country that works for everyone, it's imperative that government works with local councils and housing associations to address such issues and provide a new deal for social housing.

This Government is committed to getting more of the right homes built in the right places, sold or rented at prices local people can afford – and that includes building a new generation of council homes to help fix our broken housing market.

Towards the end of the last century council house building virtually came to a halt. Since 2010 that has begun to turn around, but now we need to get back to the scale of new social housing that will deliver a real difference to communities – that's why we've already

made it easier for councils in the most expensive areas to access the money they need to build homes for Social Rent.

This Green Paper will provide a further boost to the number of council houses. But it goes further still, renewing and deepening our commitment not just to the fabric of social homes, but also to the people who live in them.

Driven by the priorities of social residents, it will empower them by giving them greater control over their lives and homes.

Taken alongside our wider work – from building more homes to tackling rogue landlords and managing agents to scrapping unfair fees for private rented sector tenants – it underlines this Government's commitment to fixing our broken housing market and getting more people on the housing ladder.

Regardless of whether you're a tenant in the private or social sector, your home should be affordable and safe and you should be treated with fairness, respect and dignity. To make sure that is always the case, we need a new deal for social housing – and this Green Paper is the first step in delivering it.



The Rt Hon Theresa May MP
Prime Minister



Foreword from the Secretary of State

The ‘first social service’ – that was how the 1951 Conservative Manifesto described housing. It was a recognition that our homes are more than just a roof over our heads. They are our safety net and springboard to a better life.

Although we live in different times, our focus must still be to build those thriving communities people are happy to call home for generations to come.

Everyone deserves a decent, affordable and secure place to live. It’s the most fundamental of human needs. And while we have made important strides to build the homes we need in recent years, I recognise we have much further to go when it comes to making our housing market work for all parts of our society – not least for residents in social housing.

Our Green Paper is an important step towards this. It is a reaffirmation of that idea of housing as our ‘first social service’. It outlines our desire to rebalance the relationship between residents and landlords, to tackle stigma and ensure social housing can be both a safety net and a springboard to home ownership.

Ministers met almost 1,000 people – including the bereaved and survivors from the Grenfell Community – and the Department reviewed more than 7,000 online submissions. I would like to thank everyone who took part for their valuable input. What was heard made a profound impression on me and my team.

We have heard what people love about social housing – stories of people’s pride in their homes and communities.

But we also heard what needs to change. Many of the same issues came up: the stigma associated with social housing, the need for landlords to listen to residents and the desire for a culture of accountability and respect.

We have listened, and we agree major reform of social housing is needed.

This Green Paper offers a landmark opportunity to do this. It is underpinned by five principles.

The first principle is about ensuring homes are safe and decent. Residents were not only concerned about

safety, but also maintenance, repairs and poor living conditions.

The second principle underlines the need for swift and effective resolution of disputes. This was one of the biggest concerns highlighted by residents with a common perception the process of redress takes too long.

The third principle concerns empowering residents and making sure their voices are heard. This will drive better services and ensure residents have more choice and control.

There is a powerful case for strengthening the Regulator so it not only focuses on the governance and financial viability of housing providers, but also on how residents are treated and the level of services they should expect.

But we also want to empower residents, to give them the tools they need to hold their landlords to account. To achieve this, we need to make it easier for residents to see how their landlord is performing compared to others.

We are considering a range of options, but our proposals – such as an NHS-style ‘friends and family test’ and league tables – can give residents the transparency they need and provide direction to the Regulator.

Equally important is the need to address the stigma that residents in social housing so unfairly face – the fourth of our principles.

It’s sad – and utterly unacceptable – to hear about people being treated with less courtesy and respect because of where they live. This has to come to an end. I believe it is also the job of government to challenge basic false assumptions – assumptions that have somehow fuelled a belief that people in social housing don’t deserve or demand quality customer service or good design. This does not reflect our values as a country.

We have to improve people’s experience of living in social housing, by encouraging greater professionalisation and more of a customer service culture in housing management – and this Green Paper is an important step towards putting this right.

The fifth principle focuses on boosting the supply of social housing and supporting home ownership.

Significant work is already underway to increase our housing supply. We’ve put a further £2 billion into the Affordable Homes Programme alongside flexibility to offer Social Rent, increased local authority borrowing by £1 billion, built new strategic partnerships with larger housing associations and offered housing associations longer term funding certainty to help them deliver more homes.

This Green Paper seeks views on how we can build on this. We will not require local authorities to make a payment in respect of their vacant higher value council homes and are exploring new flexibilities over how they spend Right to Buy receipts. We commit to actively investigating the benefits of going further with our strategic partnerships with housing associations by offering longer term certainty. We will help those in shared ownership progress to outright ownership more easily.

But we are also ambitious for those who rent. We are consulting on longer tenancies in the private rented sector and in the social rented sector we are now proposing not to implement at this time the provisions in the Housing and Planning Act 2016 to make fixed term tenancies mandatory for local authorities, after listening to residents’ concerns.

Ultimately, these measures – combined with those in this Green Paper – ensure everyone has their part to play, be they landlords, representative groups, the wider public and residents themselves.

Together it represents one of the most important steps we can take to reaffirm housing as this country’s first social service – for everyone.



The Rt Hon James Brokenshire MP
Secretary of State for Housing,
Communities and Local Government

Executive summary

This Green Paper, '*A new deal for social housing*', proposes a rebalancing of the relationship between residents and landlords. We will ensure our social homes are safe and decent, that issues are resolved and residents' voices are heard. We will begin to tackle the stigma which for too long has been associated with social housing. And we will ensure we build the good quality social homes that we need.

This Green Paper sets out a new vision for social housing. A vision which values and respects the voices of residents, with landlords treating them with decency and respect, backed up by clear consequences when they do not. A vision centred on how social housing can support people to get on in life, making it more likely, not less, they will go on to buy their own home, as well as providing an essential, good quality and well run safety net for those who need it most.

The tragedy at Grenfell Tower on 14 June 2017 brought the significance of social housing to the attention of the nation. It should never have happened and must mark a turning point in how the country thinks and talks about social housing.

Successive governments, of all political colours, have failed to consider sufficiently the role social housing plays in a modern mixed tenure housing market. We are determined to renew our commitment to social housing and this Green Paper will kick-start a national conversation about its future.

To shape this Green Paper, Ministers from the Ministry of Housing, Communities and Local Government met and talked with almost 1,000 residents of social housing at events across England. Over 7,000 people also contributed their views online, sharing their thoughts and ideas about social housing. These views and suggestions have informed and shaped this Green Paper from the beginning.

We heard from people about the stigma they experienced as social housing residents, they want more accountability from their landlords, and want to see government tackle the sense of 'institutional indifference' which they experienced all too often.

This Green Paper represents a fundamental shift in the state's approach to social housing and the people who call it home.

Residents spoke of the need for important changes in how social housing is run, managed and viewed in this country. They wanted a renewed pride in social housing and quite simply to be treated with respect. Whether you rent or own your home, the housing market should offer you dignity and security.

A new deal for social housing

Five principles will underpin a new, fairer deal for social housing residents:

- a safe and decent home which is fundamental to a sense of security and our ability to get on in life;
- improving and speeding up how complaints are resolved;
- empowering residents and ensuring their voices are heard so that landlords are held to account;
- tackling stigma and celebrating thriving communities, challenging the stereotypes that exist about residents and their communities; and,
- building the social homes that we need and ensuring that those homes can act as a springboard to home ownership.

Delivering good quality and safe social homes with the right services from landlords relies on a robust regulatory framework. It is nearly eight years since the last review of social housing regulation,¹ and the proposals in this Green Paper present the opportunity to look afresh at the regulatory framework.

¹ <https://www.gov.uk/government/publications/review-of-social-housing-regulation--2>

Alongside this Green Paper, we are publishing a Call for Evidence which seeks views on how the current regulatory framework is operating. This Call for Evidence, along with questions about regulation in the following chapters, will inform what regulatory changes are required to deliver regulation that is fit for purpose.

We have a collective responsibility to tackle the stigma associated with social housing and treat everyone with respect, regardless of where they live or the type of home they live in. This Green Paper marks an important step towards that goal by celebrating social housing, encouraging professionalisation in the sector and supporting good quality design.

To deliver the social homes we need we will support local authorities to build by allowing them to borrow, exploring new flexibilities over how they spend Right to Buy receipts, and not requiring them to make a payment in respect of their vacant higher value council homes. We will support housing associations to build by providing funding certainty through strategic partnerships. We are also considering how to help people buying shared ownership properties to build up more equity in their homes. Having listened to the concerns of residents, we have decided not to implement at this time the provisions in the Housing and Planning Act to make fixed term tenancies mandatory for local authority tenants.

We know that to deliver this change we need everyone to play their part – whether it is landlords, representative groups, the wider public or residents themselves. We are determined to work with everyone who shares our vision to deliver a new deal for social housing.

The ‘first social service’

The 1951 Conservative manifesto referred to housing as the ‘first social service’. While we live in very different times that real long term need for social housing persists. For many people, particularly those living in areas of acute affordability pressure, the reality of the cost of housing makes renting in the private sector or saving for a deposit difficult. *‘A new deal for social housing’* will play a vital role in delivering the homes this country needs.

This Green Paper explains the important role social housing plays in the housing market. It is an integral part of thriving and diverse communities and Government wishes to protect and grow this contribution. That place you call home, no matter where or what type it is, should offer you security and dignity.

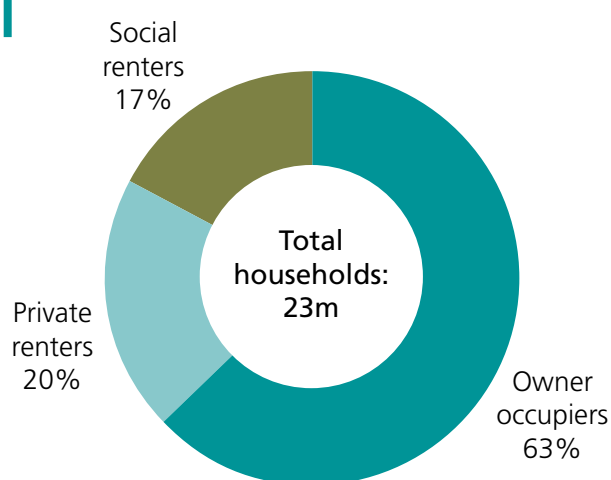


Introduction

Almost 4 million households live in social housing

1 Social homes are an important part of our national housing story. Around 3.9 million households, approximately 9 million people, live in the social rented sector in England, just under a fifth of all households.²

Figure 1: Share of households by tenure, 2016/17³



2 Social housing is housing to rent below market level rents or to buy through schemes such as shared ownership. It is made available to help those whose needs are not served by the market. Social Rent levels take into account a measure of relative local earnings as well as relative property values. It is typically set at around 50-60 per cent of market rents. Affordable Rent was introduced in 2011 to support building more new homes below market rents. Affordable Rent levels are set at a maximum of 80 per cent of the market rent (except in London where both Social Rent and Affordable Rent levels tend to be lower). Around 95 per cent of rented social housing is let at Social Rent, with around five per cent let at Affordable Rent.⁴ Since 2010 over 100,000 new affordable home ownership homes have been delivered, including 60,000 for shared ownership.⁵

2 English Housing Survey 2016/17

3 ibid

4 MHCLG Local Authority Housing Statistics; HCA Statistical Data Return; VOA Private Rental Market Statistics

5 MHCLG Live Tables 1000 and 1012

There is a mix of local authority and housing association landlords

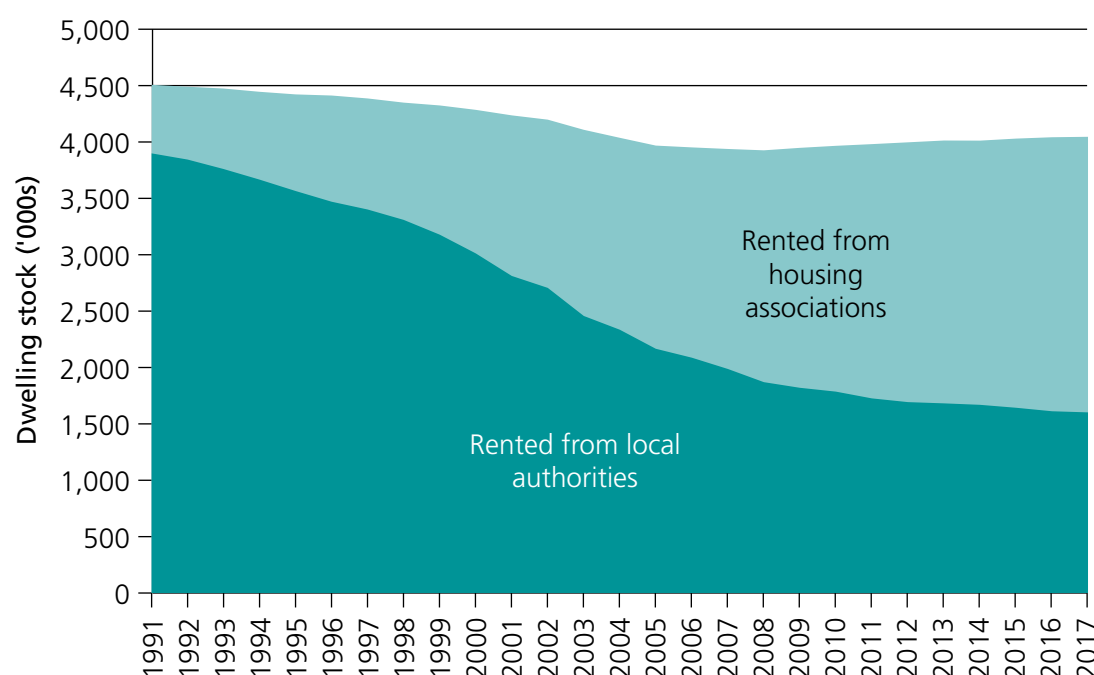
3 The social housing sector is a diverse part of the housing market, with many different providers. Social housing is provided by local authorities and private registered providers, which are primarily housing associations.

4 Since the 1980s there has been a shift towards most of the provision being by housing associations, through a combination of homes transferred from local authorities, and housing associations mainly taking over the role of building new social homes.

There is a continued need for more social housing

5 Various measures suggest there will be a continued need for more social housing. The number of households is projected to rise, with average annual household growth of around 220,000 over the next few years.⁶ Not everyone will be able to meet their housing needs through the market. There are consistently over 1 million households on local authorities' waiting lists.⁷ There are over one million households in the private rented sector receiving Housing Benefit,⁸ and roughly 50-60,000 households are accepted as homeless and in priority need in England each year.⁹

Figure 2: Social stock by provider¹⁰



6 MHCLG Live Table 411

7 MHCLG Live Table 600

8 DWP (2018) Stat-Xplore

9 MHCLG Live Table 784

10 MHCLG Live Table 104

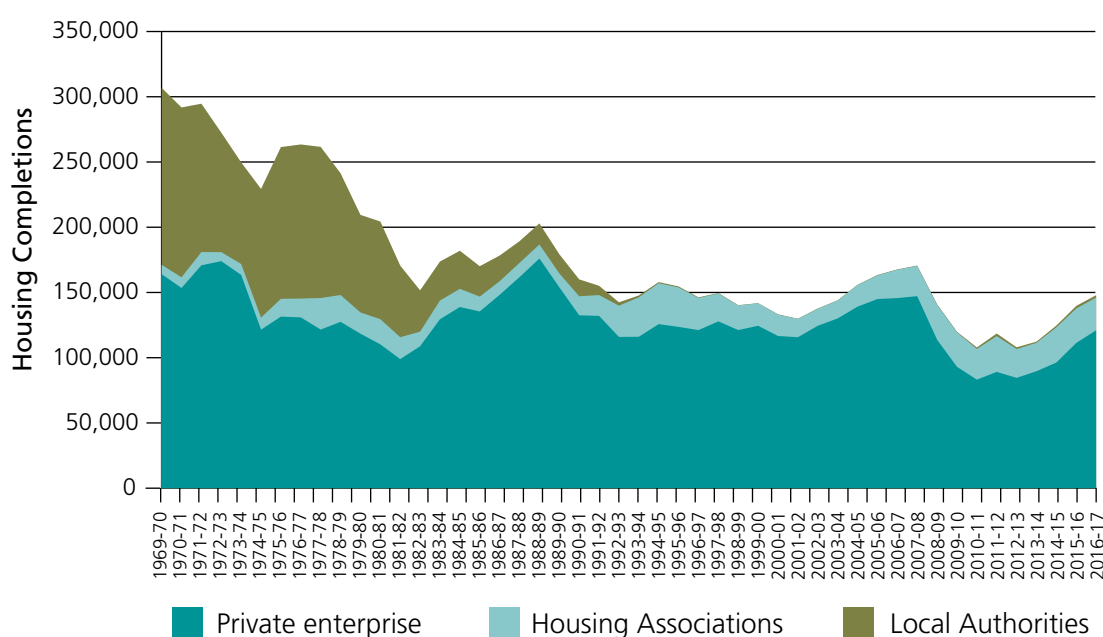
6 It is estimated that around 14 per cent of social housing is supported housing.¹¹ Supported housing is accommodation provided alongside support, to help people live independently. It has a key role to play in supporting some of the most vulnerable in our society, including older people, people with mental ill health, learning disabilities, physical and sensory disabilities, autistic adults, care leavers, people fleeing domestic abuse, rough sleepers, those with drug and alcohol dependencies, vulnerable ex-service personnel and ex-offenders. However, as set out below, the value and function of social housing goes well beyond this important role.

Affordable housing plays an important role in delivering new supply

7 As set out in our Housing White Paper '*Fixing our broken housing market*' we need to build more homes.¹² At Budget 2017 we stated that our ambition is to increase the average number of new homes delivered each year to 300,000 by the mid-2020s.¹³ To achieve this we will need to increase all types of supply, including social homes.

8 The last time the country was building at scale was in the late 1960s, when social housing made up almost half of the total supply.¹⁴

Figure 3: Housing completions by tenure¹⁵



11 DWP & DCLG (2016) Supported accommodation review

12 <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>

13 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/661430/Building_the_homes_the_country_needs.pdf

14 MHCLG Live Table 209

15 *ibid*

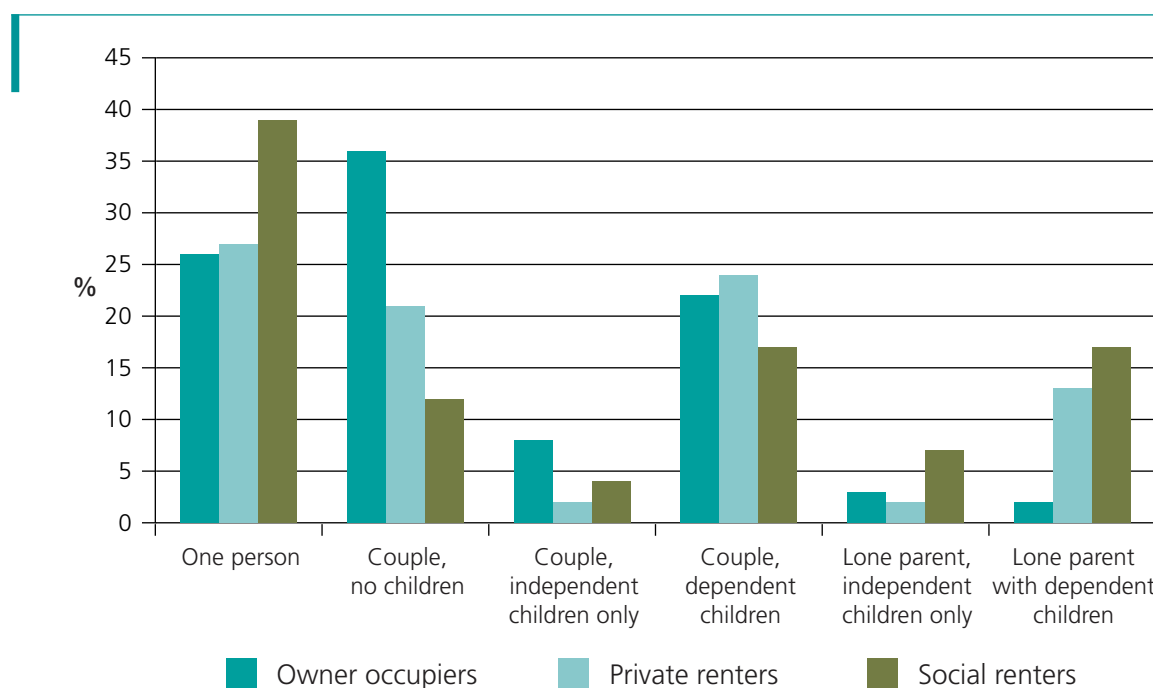
A diverse range of people live in social housing

9 Social housing tenants tend to be of a similar age mix to all households in the population but they are more likely to be living on their own or to be lone parents than those living in other tenures.¹⁶

10 The social rented sector has a similar proportion of ethnic minority households to the private rented sector (around 18 per cent for both sectors compared to 12 per cent for all households). As highlighted by the Race Disparity Audit, some ethnic groups are more likely to rent social housing than others and to be in overcrowded homes. For example, 43 per cent of all black households live in the social rented sector, compared to 16 per cent of white households and 25 per cent of all ethnic minority households.¹⁷

11 In 2016/17, 91 per cent of social housing lettings were made to UK nationals, 4 per cent to European Economic Area nationals, and 4 per cent to nationals of other countries.¹⁸

Figure 4: Household type by tenure, 2016/17¹⁹



16 English Housing Survey 2016/17; figures refer to the 'household reference person' i.e. the 'householder' in whose name the accommodation is owned or rented

17 English Housing Survey 2016/17; where households contain people from different ethnic backgrounds, figures refer to the ethnic background of the household reference person

18 MHCLG social housing lettings Continuous Recording (CORE) statistics; numbers do not sum due to rounding

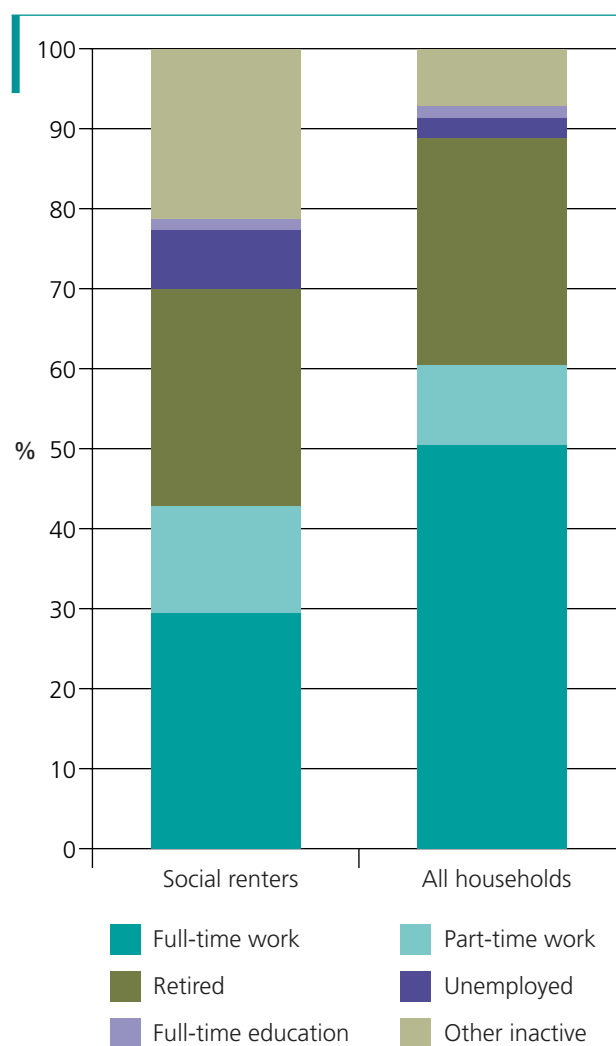
19 English Housing Survey 2016/17

12 43 per cent of social rented households are in full or part-time work. This is higher than it was in 2010/11 (when it was 32 per cent), but remains lower than the average for all households (60 per cent). For those of working age the figure for the social sector rises to 58 per cent. There is a higher proportion of part-time working households in social housing than in other tenures.²⁰

13 7 per cent of social rented households are unemployed, 27 per cent are retired, while 21 per cent are economically inactive (which includes those with a long-term illness or disability, and those looking after family members or the home). Half of social households have at least one member with a long-term illness or disability.²¹

14 Almost three quarters of social renters are in the bottom 40 per cent of the income distribution.²²

Figure 5: Economic characteristics of households, 2016/17²³



20 English Housing Survey 2016/17

21 ibid

22 ibid

23 ibid

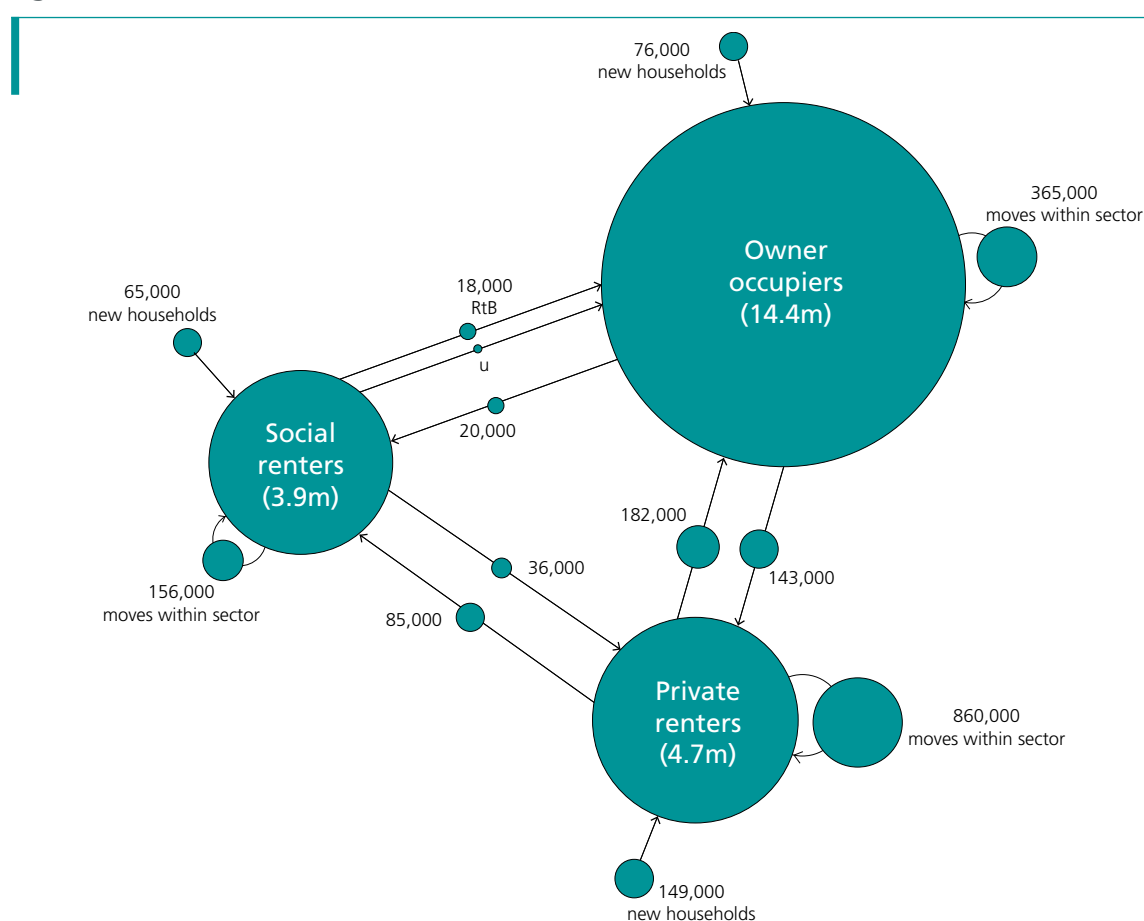
Social tenants move infrequently compared to people in other tenures

15 Local authorities are responsible for deciding access to their own social homes and to a large proportion of housing association homes through nomination agreements, setting their allocations policy within a nationally set framework. There are between 300,000 and 400,000 social housing lettings in England each year, which is around 8 per cent of the homes changing hands in a year. Around a third of these are households moving within the sector, although this varies across the country. Social properties are less likely to change hands where private rents are relatively more expensive,²⁴ which may discourage social renters from changing sector.

16 There is some social housing in all local authorities. London has the highest number of social homes as a proportion of its housing (23 per cent) while the South East and South West have the lowest (at 13 per cent).²⁵ Across the country, there is wide variation in the proportion of homes provided by local authorities and housing associations. Around half of local authorities have no council housing at all,²⁶ but in some areas they own the majority of social housing, particularly across Yorkshire and Humber and the East Midlands.²⁷

17 Last year around 36,000 households moved from social housing into the private rented sector. Just over 18,000 households exercised their Right to Buy, but aside from that there is very little movement into owner occupation.²⁸

Figure 6: Household moves, 2016/17²⁹



24 MHCLG social housing lettings Continuous Recording (CORE) statistics

25 MHCLG Live Table 100

26 MHCLG Local Authority Housing Statistics 2016/17

27 HCA Statistical Data Return 2016/17

28 English Housing Survey 2016/17; MHCLG Live Table 671

29 *ibid*; 'u' indicates sample size too small for reliable estimate

Two thirds of tenants aspire to own their own home

18 Around two thirds of social tenants would prefer to be owner-occupiers if they had a free choice.³⁰ As of 2016/17, only 30 per cent of social renters expect to buy a home in the future (up from 24 per cent in 2014/15), compared to the 60 per cent of private renters who expect to buy. Of the social renters expecting to buy, around half expect to buy their current home.³¹

19 We recognise that some people living in social housing have particular needs and will need specific support. Equally, many residents, including those who are more vulnerable, are active citizens and contribute to the community spirit in their own neighbourhood. Most social housing residents of working age are employed, defying a common stereotype. Many residents that we spoke to described the positive contributions they made to their community through paid and voluntary work.

Responding to the problems we face

20 Social housing residents, landlords and stakeholders have shared many common issues with us. The engagement events in Basingstoke, Birmingham, Bridgwater, London, Newmarket, Nottingham, Oxford, Preston, Sittingbourne and York and feedback online from residents have been critical in deepening our understanding of social housing.

21 Most recognised an imbalance in the relationship between residents and landlords. At the events residents challenged the stereotype that people who live in social housing are passive recipients of a service or benefit. There are many areas where residents said they wanted to become more informed and empowered, from a better understanding of how well their landlord operates, to increased opportunities to exercise choice and control, and to have their voices heard. Chapters one to three look at the issues that impact on this relationship including how we make sure we have the right standards for safe, good quality and well maintained social homes and services. These must be underpinned by the right regulatory system,

and a redress process that makes sure issues are resolved promptly and fairly.

22 Residents and landlords underlined the problem of stigma associated with social housing. Many are proud of their homes and of living in social housing, and proud of working in and delivering social housing. However they see attitudes from across society, the media and public servants as driving negative stereotypes. They feel that the way social housing is managed and run can reinforce these stereotypes. Chapter four brings together the structural shift and policy reform across this Green Paper that we believe can drive changes in attitudes, so that people living in social housing are seen more as active and civic minded neighbours, as well as aspirational consumers in their relationship with their landlords.

23 Residents and landlords raised the need for more homes that are affordable to people on lower incomes, enabling them to stay in and continue to contribute to their communities. Government is committed to helping people that want to own their own home to realise their aspirations. The fifth chapter looks at Government programmes that contribute to driving up supply and support home ownership, while ensuring that we have a continuing stream of social homes for those who will need them in the years to come.

24 Supported housing provides a vital service for vulnerable people in crisis, such as those fleeing domestic abuse or facing homelessness, as well as a lifelong home for people with learning difficulties, mental ill-health and for older people looking to lead an independent life for as long as possible. On 9 August 2018 Government published a response to the two October 2017 consultations on funding for supported housing setting out that we are maintaining Housing Benefit for all supported accommodation. This will give the sector the confidence and certainty they need to continue to invest in new supported homes.

25 Government is also carrying out a comprehensive package of work around domestic abuse, homelessness, disability and adult social care:

- We believe that any person without a home is one too many. We have committed £1.2 billion to tackle homelessness and recently implemented

30 MHCLG (2018) Public attitudes to house building: findings from the British Social Attitudes survey 2017

31 English Housing Survey 2016/17

the Homelessness Reduction Act, which means that more people will get the help they need at an earlier stage.

- We have committed to halve rough sleeping by the end of this Parliament and to end it by 2027. We have published a Rough Sleeping Strategy which sets out our initial plans to achieve this.
- The forthcoming social care green paper will set out plans for how to improve care and support for older people and tackle the challenge of an ageing population.
- We have recently commissioned an independent review of the Disabled Facilities Grant to understand how we can best use the Grant to support disabled people to live safely and independently at home.
- We announced a Review and Audit of Domestic Abuse services in July 2018, alongside £18.8 million funding to help support survivors.

26 The proposals set out in this Green Paper apply to England only. In Scotland, Wales and Northern Ireland, housing policy is the responsibility of the Scottish Government, Welsh Government and Northern Ireland Executive respectively. The UK Government retains responsibility for housing policy in England, including funding for England-only bodies such as Homes England (the trading name of the Homes and Communities Agency). The Mayor of London is responsible for housing in London.


27 Throughout this Green Paper we have included online responses from residents and what we heard at the face-to-face engagement events. Some statements have been edited to ensure anonymity.

Key terms used in this Green Paper:

Residents – This Green Paper considers the issues facing all residents of social housing, including those who rent, leaseholders and shared owners. We have referred throughout to “residents” to include all those living in social housing, except where an issue is only relevant to those who are renting from a social housing landlord, in which case we also refer to “tenants”.

Landlords – Generally throughout this Green Paper we use the term “landlord” to cover anyone who rents social homes to people. It also covers social landlords of leaseholders and shared owners.

There is a full glossary of terms used at the end of this Green Paper.



Chapter 1: Ensuring homes are safe and decent



1.1 Ensuring resident safety

28 Social housing must be safe and decent. The Grenfell Tower tragedy should never have happened. In addition to the lives lost and shattered within that community, it shook public trust in the wider system of fire safety. In the days following, we took immediate steps to ensure residents' safety. The Government set up a new expert panel to advise on action. A screening test process was also up and running at the Building Research Establishment the week after the Grenfell Tower tragedy to enable building owners to establish the type of aluminium composite material cladding present on their buildings.

29 Remediation work has started on 70 per cent of buildings in the social housing sector.³² We have announced £400 million funding for local authorities and housing associations to remove and replace unsafe aluminium composite material cladding on social residential buildings 18 metres or over that they own, and financial flexibilities are available to local authorities for other essential fire safety work.³³ Government has consulted on significantly restricting or banning the use of "desktop studies" to assess cladding systems, and is consulting on banning the use of combustible materials in the external walls of high-rise residential buildings.

30 As well as taking immediate measures to make existing buildings safe, we asked Dame Judith Hackitt to carry out an independent review and the final report, the *'Independent Review of Building Regulations and Fire Safety'* was published on 17 May 2018.³⁴ We are committed to bringing forward legislation that delivers a far-reaching overhaul of the system, and gives residents a much stronger voice in an improved system of fire safety.

31 One of Dame Judith's recommendations relevant for this Green Paper is that residents should be proactively given information about building safety, including setting out what their responsibilities are, and residents should have the right to access detailed safety information, such as fire risk assessments.

32 <https://www.gov.uk/government/publications/building-safety-programme-monthly-data-release-june-2018>

33 <https://www.gov.uk/government/news/government-announces-it-will-fully-fund-unsafe-cladding-removal-in-social-housing>

34 <https://www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report>

The final report also recommends that landlords should have a resident engagement strategy for their buildings which sets out how they will share information and engage with residents on safety.

Residents told us

Fire safety concerns me most because a lot of young families reside in these blocks. This can be improved by educating residents.

I am happy with my flat. Annual fire safety checks carried out. I am grateful to have somewhere to live that suits me and is affordable.

32 The Government agrees with Dame Judith's assessment and supports the principles behind the report's recommendations for a more effective system. We are committed to bringing forward legislation that delivers meaningful and lasting change across all tenures. Reform of the scale envisaged by Dame Judith will take time and Government has identified an opportunity to accelerate a social sector early response, building on the existing good practice in the sector. We will be developing a new programme to support residents to engage with their landlords on issues of building safety in social housing.

33 It is critical that landlords work closely and openly with residents on this so we also want to establish a pilot with a small group of social landlords who would innovate and trial options for communicating with and engaging with residents on safety issues.

34 Alongside the recommendations with respect to requirements on landlords, Dame Judith's report states that residents have an important role to play in identifying and reporting issues that may impact on the safety of the building and in meeting their obligations, including co-operating with crucial safety-related works, to ensure their own safety and that of their neighbours.

35 **How can residents best be supported in this important role of working with landlords to ensure homes are safe?**

Residents told us

In general, the building is in good upkeep. However, when things go wrong, e.g. there is a leak, the housing association doesn't act appropriately.

1.2 Reviewing the Decent Homes Standard

36 As well as being safe, all homes should be provided and maintained to a decent standard. We want to use this Green Paper to consider a review of the standard that we set for social homes. The Regulator of Social Housing ("the Regulator") requires that social homes meet the Decent Homes Standard,³⁵ which requires social homes to be free of hazards that pose a risk to residents,³⁶ to be in a reasonable state of repair, to have reasonably modern facilities and services such as kitchens and bathrooms and efficient heating and effective insulation. Progress has been made in improving standards of decency. Between 2011 and 2016 we provided a total of £1.76 billion to the Decent Homes Programme.³⁷ Non-decent homes made up 13 per cent of all social housing in 2016. This is down from 20 per cent in 2010.³⁸ Progress in the social sector has been made, but we want to ensure all homes are safe and decent.

Residents told us

Quality of the buildings and the maintenance of them - they should be monitored and if they need replacing such as new bathrooms, kitchens windows etc. then those should be carried out.

37 Moreover, the Decent Homes Standard has not been revised since 2006, so we believe it should be reviewed to consider whether it is demanding enough and delivers the right standards for social housing alongside other tenures. The standard could also be updated to reflect Government's current and forthcoming priorities.

35 <https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance>

36 "Category 1 hazards" under the Housing Health and Safety Rating System

37 <https://www.gov.uk/government/publications/2010-to-2015-government-policy-rented-housing-sector/2010-to-2015-government-policy-rented-housing-sector>

38 English Housing Survey 2016/17

Residents told us

We have a gas fire that throws absolutely no heat out at all. All the radiators in the bedroom are also old and no good and the council go on about a warm home campaign and saving money, but it costs us a fortune in fuel to try and get the house warm. We might as well sit outside, it makes no difference half the time.

39 For all of these reasons, Government would like to explore whether the Decent Homes Standard continues to cover the right issues. **Should new safety measures in the private rented sector also apply to social housing? Are there any changes to what constitutes a Decent Home that we should consider? Do we need additional measures to make sure social homes are safe and decent?**

38 There have been recent changes to drive up safety that apply to the private rented sector but not the social sector. For example, in 2015, we introduced a requirement to install smoke alarms on every storey in a private sector rented home, and carbon monoxide alarms in every room containing solid fuel burning appliances. Government has recently announced that there will be a mandatory requirement on landlords in the private rented sector to ensure electrical installations in their property are inspected every five years.³⁹ In reviewing the Decent Homes Standard, where practicable we will also consider the outcome of the Government's consultation on 'The Clean Growth Strategy' on whether the energy performance of social homes should be upgraded to Energy Performance Certificate Band C by 2030 where practical, cost-effective and affordable.⁴⁰

Questions

1. How can residents best be supported in this important role of working with landlords to ensure homes are safe?
2. Should new safety measures in the private rented sector also apply to social housing?
3. Are there any changes to what constitutes a Decent Home that we should consider?
4. Do we need additional measures to make sure social homes are safe and decent?

³⁹ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2018-07-19/HCWS890/>

⁴⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf

A photograph showing a woman with long dark hair, seen from the back and side, wearing a blue jacket. She is looking towards a man on the right, who is wearing a blue sweater and looking down at a clipboard. They are standing in front of a red brick wall. A washing machine is visible in the background, set into the wall.

Chapter 2: Effective resolution of complaints



Image © Help on Your Doorstep

40 Residents should have a stronger voice to influence decisions and challenge their landlord to improve performance. They must also be able to access good complaints processes, as well as swift and effective redress where appropriate.

41 We are already taking a number of steps to improve this across the housing market. Our recent consultation '*Strengthening consumer redress in the housing market*' sought views on how to make current in-house complaints processes better, raise consumers' awareness of redress schemes, and improve the accessibility, speed and transparency of alternative dispute resolution processes.⁴¹ It also considered whether bringing together redress schemes into a single housing ombudsman service could help simplify access and reduce confusion for both tenants and owners.

Residents told us

The complaints process is opaque, inaccurate and chaotic with too many stages and little clarity on the roles and responsibilities of those involved.

42 Many of the issues raised by social housing residents are being considered as part of that consultation. We are currently analysing responses and will publish a formal response later this year.

43 We now want to consider what else should be done specifically to improve the current complaints process for social housing residents, outlined in Box 1, to ensure problems are resolved swiftly.

⁴¹ <https://www.gov.uk/government/consultations/strengthening-consumer-redress-in-housing>

Box 1: The current process for complaints

The first course of action if residents have a complaint is through the landlord's in-house complaints process. Social housing landlords are required to provide residents with a complaints handling service, to publish information on the nature and number of complaints received and to inform residents of how information on complaints is used to improve services.⁴²

If residents are unhappy at the end of this process, the resident can refer their complaint to a "designated person" (such as a local MP, councillor or tenant panel) but if they do not want to do this or the designated person does not resolve or refer it themselves, a resident must wait for eight weeks before the complaint can be referred to the Housing Ombudsman.⁴³

The Housing Ombudsman provides a free, independent and impartial complaints resolution service to residents. The Ombudsman aims to provide residents and landlords with sufficient advice and assistance to enable them to resolve their complaints locally and early wherever possible. This ensures the best outcomes and improves landlord and tenant relationships. Where an early resolution or mediation has failed or is not possible or appropriate, then the Housing Ombudsman will investigate and determine cases fairly and impartially.

Residents can also approach the **Regulator of Social Housing** directly with their complaint at any time. However, the Regulator only acts in such circumstances where there is evidence of systemic, corporate failure of an organisation rather than individual issues. All of the information received about complaints is used to determine whether there is evidence that a landlord is, or may be, responsible for a breach of the Regulator's standards. Most complaints brought to the Regulator's attention in this way do not meet such criteria and so are signposted on to the Housing Ombudsman for consideration. The Housing Ombudsman itself may make referrals to the Regulator where it believes there is a possible breach of regulatory standards, based on complaints it has received. A Memorandum of Understanding between the two bodies underpins this working relationship.⁴⁴

2.1 Removing barriers to redress

44 Alternative dispute resolution and mediation services can be critical in allowing issues to be resolved swiftly and locally, while sustaining positive relationships between the parties involved. We are considering whether and how we might strengthen the mediation available for residents and landlords after initial attempts at resolution have failed.

Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

45 Currently, residents can seek advice and support for local resolutions of their complaints from the Housing Ombudsman at any time. In 2017/18, 7,087 cases were closed by the Housing Ombudsman, and of that 5,467 were closed through local resolution while the complaint was going through a landlord's complaints procedure and did not need to be formally determined by the Housing Ombudsman.⁴⁵ However if residents wish to submit their unresolved complaint to the Housing Ombudsman for a formal investigation they must first refer it to a "designated person" – that is a local councillor, MP or tenant panel – or wait eight weeks. This is known as the "democratic filter".

42 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628396/Tenant_Involvement_and_Empowerment_Standard.pdf

43 <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

44 <https://www.housing-ombudsman.org.uk/2017/04/21/memorandum-understanding-regulator-social-housing-signed/>

45 <https://www.housing-ombudsman.org.uk/about-us/corporate-information/publications/>

Case study – The Housing Ombudsman resolving a complaint through local resolution

A tenant, who was registered blind, complained to the landlord about the condition of their property at the start of their tenancy. The tenant took steps to clean and redecorate the property and requested compensation from the landlord for the costs incurred. The landlord acknowledged that the property had not met its void standard, apologised and offered £140 in recognition of service failures such as the condition of the property, the failure to inform the tenant of procedures, and the cost of cleaning materials. The tenant was not happy with the landlord's offer and brought the complaint to the Housing Ombudsman. The Ombudsman facilitated a conference call between landlord and tenant and as a result the landlord increased its offer of compensation to £1,120 to cover the costs of works which would not have been incurred had the property met appropriate standards at the start of the tenancy, as well as for time and trouble. The tenant was satisfied with the result. The Ombudsman then asked the landlord to consider how it works with vulnerable tenants, they identified a number of lessons from the complaint and invited the tenant to join its local scrutiny panel.

46 The “democratic filter” was introduced in the Localism Act 2011, as part of a wider ambition to drive local resolution of issues. However, our engagement revealed that the process does not appear to work for residents. There is a perception that the process of seeking redress takes too long. This may be particularly problematic where urgent action is required, for example where a resident is at risk of harm or if there are other safety concerns.

47 The Housing Ombudsman's own recent consultation uncovered similar concerns.⁴⁶ It found that although some local “designated person” arrangements work well, in many cases they do not, and that there are designated persons who did not fully understand their role. We are also aware that in some areas there are either no tenant panels or those that do exist are not used.

48 The “democratic filter” is an additional hurdle before accessing the Housing Ombudsman that does not apply to people with complaints in most other sectors. We are considering how best to improve access to the Housing Ombudsman for social housing residents. **Should we reduce the eight week waiting period to four weeks, or should we remove the requirement for the “democratic filter” stage altogether?**

49 Reforming the filter stage would require primary legislation. We therefore also want to explore what more could be done in the meantime to help ensure that “designated persons” better understand their role and help to deliver swift local resolutions for residents. **What can we do to ensure that the “designated persons” are better able to promote local resolutions?**

⁴⁶ <https://www.housing-ombudsman.org.uk/about-us/corporate-information/publications/our-consultations/>

2.2 Supporting residents to raise complaints

50 Residents should be aware of all routes open to them to raise concerns and feel confident using them. In 2017/18, 91 per cent of customers said that the Housing Ombudsman treated them well and 75 per cent said that the Ombudsman helped resolve their cases.⁴⁷ However, a number of residents told us that they had not been aware of the Housing Ombudsman's services.

51 Within the social sector we have heard suggestions that more could be done proactively to raise awareness of residents' options for escalation, for example supplying details on redress options at every new letting. We are looking at awareness of housing dispute resolution services more widely as part of our consultation on strengthening consumer redress in housing. We also want to consider if there is a case for an awareness campaign to support social residents to understand their rights to seek redress and to know how to make complaints and escalate them where necessary. **How can we ensure that residents understand how best to escalate a complaint and seek redress?**

Residents told us

[Before the Grenfell tragedy] I didn't know what the full formal complaints procedure was.⁴⁸

Organisations expect to wear you down. I wish it was easier for me.⁴⁹

52 We also heard from some residents that they fear the consequences of making a complaint, something we take very seriously. There are a number of existing services that can provide advice and support to residents when considering or making a complaint. This includes organisations such as Shelter, Citizens Advice and TAROE Trust as well as innovations such as Resolver – a digital tool that helps consumers to raise and resolve issues. We want to understand whether more residents need to be able to access independent advice and potentially advocacy to support them in

making a complaint. Options could include more active signposting to existing advisory services or the creation of a single advice or advocacy service, which we could consider in the context of our wider ambitions to streamline and improve access to redress in housing. **How can we ensure that residents can access the right advice and support when making a complaint?**

2.3 Speeding up the complaints process

53 Residents must be able to obtain high quality, timely responses to complaints that they raise. There are no statutory guidelines setting out timeframes within which landlords should handle complaints and residents told us they were dissatisfied with the length of time it can take to resolve issues. We therefore want to consider how to speed up landlord complaints processes. One option might be for the Regulator to set out more specific timescales in a Code of Practice. **How can we best ensure that landlords' processes for dealing with complaints are fast and effective?**

Residents told us

The housing association is not quick at responding to issues. It's as though I don't live there so I don't have to worry about it.

No one is the right person and residents are passed along frequently, it takes a long time, causes a lot of stress and issues remain unresolved.⁵⁰

54 The speed of decisions is equally important when issues are escalated. We are already working with the Housing Ombudsman to reduce the time it takes to determine their cases. We have recently approved the Housing Ombudsman's Business Plan for 2018-19, which sets a priority target of reducing the time taken for a determination to six months. In 2017/18 the average time taken for a determination was eight months, compared to nine months in 2016-17.⁵¹ Meeting the six month priority target will

47 <https://www.housing-ombudsman.org.uk/about-us/corporate-information/publications/>

48 Comment from face-to-face engagement event

49 ibid

50 ibid

51 <https://www.housing-ombudsman.org.uk/wp-content/uploads/2018/06/Business-plan-2018-19.pdf>

require the Housing Ombudsman to hire and train new staff. We will work with the Housing Ombudsman as they prepare their new corporate plan. This will be a good opportunity to ensure they have what they need to deliver the best outcomes for both residents and landlords. We will align this work with our recent consultation considering measures to strengthen redress across the housing market.

Residents told us


The full complaints system was difficult to find initially and three complaints have not been addressed promptly and fairly. The recently amended version gives our landlord the right to refuse escalation if it believes the outcome will not change.

55 Speed of response is particularly important when dealing with safety concerns. Dame Judith Hackitt's '*Independent Review of Building Regulations and Fire Safety*' states that residents should have a clear and direct route of escalation and redress in relation to building and fire safety issues.⁵² The final report is informing our consideration of the responses to the '*Strengthening consumer redress in housing*' consultation in relation to any future redress system, but we want to hear views on options which could improve the position in the meantime, pending such wider reform. **How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?**

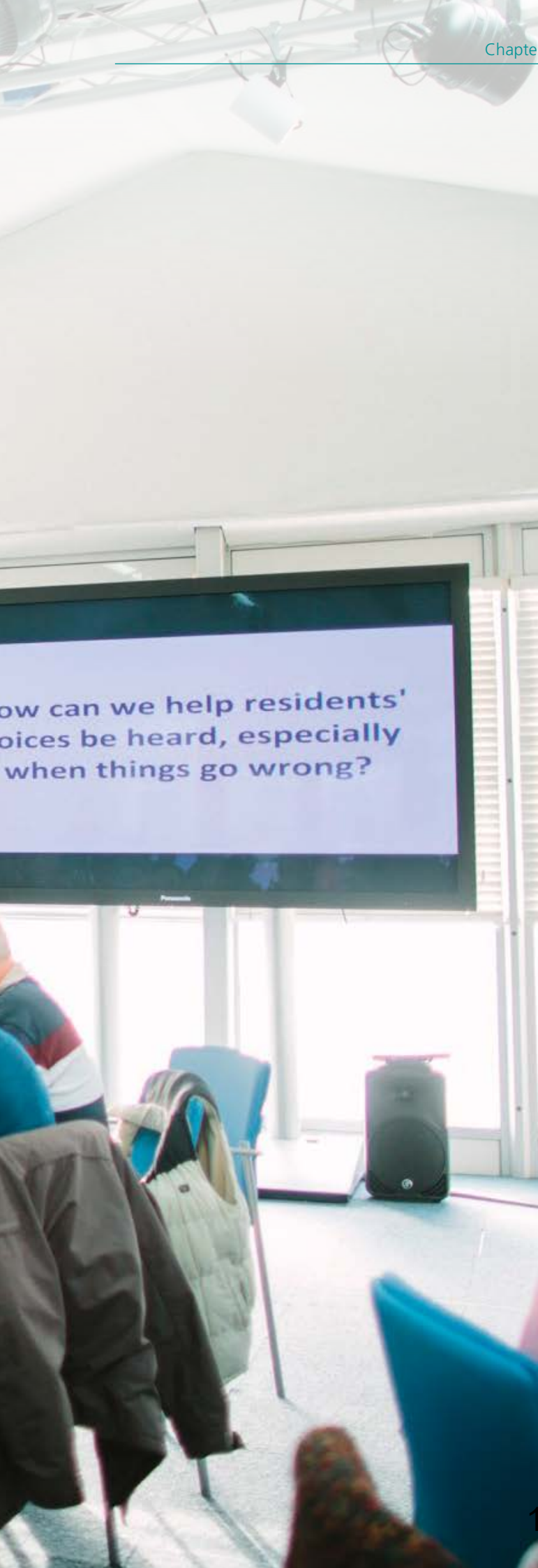
Questions

5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?
6. Should we reduce the eight week waiting period to four weeks, or should we remove the requirement for the "democratic filter" stage altogether?
7. What can we do to ensure that the "designated persons" are better able to promote local resolutions?
8. How can we ensure that residents understand how best to escalate a complaint and seek redress?
9. How can we ensure that residents can access the right advice and support when making a complaint?
10. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?
11. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?

52 <https://www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report>

A photograph of a meeting room. In the foreground, several people are seated at tables, facing away from the camera. In the background, a large banner for 'building homes' is visible, featuring a red brick house and the website 'www.vividhomes.co.uk'. To the right, a large screen displays a presentation. The room has large windows with white blinds and a modern ceiling with track lighting.

Chapter 3: Empowering residents and strengthening the Regulator



3.1 Arming residents with information on landlord performance

56 For residents to be empowered they need good information on how their landlord is performing compared to others. While landlords have to provide residents with annual reports on their performance, residents told us that these were not always accessible to use or easy to compare.

Residents told us

Their performance needs to be monitored by an independent authority so there is help when they don't do these things.

They do not issue their performance data, so nobody knows if they are or are not meeting key performance indicators.

57 We want residents to be able to compare performance more easily. We want landlords to be assessed against standards that matter to residents. To achieve this, performance data needs to be published in a clear, regular and consistent format. We consider that the most effective way of doing this is for the performance of all landlords to be assessed against a number of agreed and meaningful key performance indicators which will be made publically available in a way that enables easy comparison.

58 We think that any key performance indicators should be focused on issues of key importance to residents, covering those identified through our engagement, such as:

- keeping properties in good repair;
- maintaining the safety of buildings;
- effective handling of complaints;
- respectful and helpful engagement with residents; and,
- responsible neighbourhood management, including tackling anti-social behaviour.

59 Several pieces of data might be needed to effectively assess performance. For example, key performance indicators on repairs could assess how quickly a landlord responds to repairs and satisfaction with the outcome of repair work.

60 We also want to make sure that residents' overall experience and satisfaction is effectively measured and reported. Since 2012 the NHS has introduced a 'friends and family test' to ask users whether they would recommend a service provider.⁵³ We want to explore whether it would be useful to introduce a similar indicator for residents in social housing.

61 We think that the best way for these key performance indicators to be made available publicly is for the information on performance to be provided to the Regulator every year for publication. **Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered? Should landlords report performance against these key performance indicators every year? Should landlords report performance against these key performance indicators to the Regulator? What more can be done to encourage landlords to be more transparent with their residents?**

62 We are considering a new key performance indicator for landlords' performance on dealing with complaints, to help drive improvements within the sector and ensure more issues are put right first time.

63 We also want to ensure residents are able to compare the performance of different landlords' complaints handling more easily. For example, in the energy market, data is published showing how many complaints energy suppliers receive, how many Citizens Advice handle, and how many are accepted by the relevant ombudsman after failing to be resolved by the supplier. The Regulator already expects landlords to publish information about complaints each year, but approaches vary. We are considering setting out a consistent approach on how landlords should report their complaint handling outcomes, by asking them to report how many complaints were resolved, how many were resolved after repeated complaints and how many were referred to the Housing Ombudsman. **Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?**

64 Our current thinking is that these key performance indicators should be prepared by the Regulator, and we would expect the Regulator to engage with relevant bodies, such as landlords and landlord organisations, and resident groups, in their preparation.

65 We also want to consider the best way to publish and present this data so that it can be easily drawn on by residents. The Scottish Housing Regulator makes available reports on the performance of individual landlords and publishes data which sets out how all Scottish landlords have performed on average across all performance indicators from the Scottish Social Housing Charter.⁵⁴

66 We think the Regulator is best placed to publish landlord performance in the form of league tables. However other approaches should be considered, including that used in Scotland. We would also welcome views on whether it would be helpful if landlord performance on key performance indicators is also reflected in a "consumer" ratings system, in addition to the governance and viability ratings, which the Regulator currently publishes for larger housing associations. **Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords? What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?**

3.2 Rewarding good performance

67 We want to make sure that the transparency proposed by key performance indicators and league tables drives better services for residents in practice. In addition to publishing this information for residents, we want to consider the role of financial incentives and penalties to promote the best practice and deter the worst performance.

⁵³ <https://www.england.nhs.uk/fft/>

⁵⁴ <https://www.scottishhousingregulator.gov.uk/find-and-compare-landlords/statistical-information>

68 Government's £9 billion Affordable Homes Programme supports landlords' delivery of affordable homes. We want to explore whether the key performance indicators should help inform or influence the extent to which landlords receive funding and are minded to link Affordable Homes Programme funding to the Regulator's governance rating as well as the viability rating. We will work with the Regulator to understand how the governance rating could be informed by the key performance indicators and how that rating could then inform the Affordable Homes Programme bid assessments. We will also consider how the key performance indicators could be used to help develop the requirements for any future strategic partnerships with social housing landlords. These partnerships are explained further in chapter five. The overarching aim is to ensure the standards reasonably expected by residents in their day-to-day lives are being effectively monitored by the regulatory regime that we put in place.

69 We recognise that this may not incentivise all landlords, since many do not build new homes or rely on our funding. But most of the larger landlords do, and we want to assure ourselves that we are spending our money wisely and supporting a safe, decent social housing offer. **Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord? What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?**

3.3 Ensuring residents' voices are heard

70 Effective resident engagement can benefit everyone – landlords and residents as well as the wider community. A detailed study by the University of Westminster showed a strong correlation between involving residents and delivering value for money.⁵⁵ And yet too many residents we met told us that their landlord did not take their views into account.

71 We want to ensure a more consistent picture across the country of genuine engagement with residents, to ensure they have influence over the decisions that affect their lives. The information that we are considering making available through the key performance indicators should help, including monitoring whether landlords are engaging effectively with residents. Better knowledge of how services compare can help people be more informed consumers and push for service improvements – for example in the health sector people are supported to find, choose, feedback on and compare services.⁵⁶

72 However, to make this work it is critical that landlords take residents' views seriously and use feedback to shape services. Landlords are required to consult tenants at least once every three years on the best way of involving them in the governance and scrutiny of the housing management service, and demonstrate how they respond to tenants' needs in the way they provide services and how they communicate.⁵⁷ Through the proposed regulatory review we will consider whether these expectations need to be clarified to ensure greater consistency and transparency of expectations.

Residents told us

Our efforts to be meaningfully involved with the management of our homes have been extremely difficult as the landlord refused to effectively work with some residents to identify and repair warranty defects, ongoing maintenance and improvements to services. The landlord claims to be complying with the regulatory framework and ignored my application to join a tenants' panel.

73 All landlords should use customer feedback to improve services, and some are finding increasingly sophisticated ways to do this. Some landlords go further and actively work with residents to co-design services from the outset. However, landlords tell us that it is not always easy to engage all of their residents, particularly those who are vulnerable or isolated. We want to understand more about whether the regulatory framework is setting the right expectations on how landlords should engage with residents, and

55 University of Westminster (2015), *Success, Satisfaction and Scrutiny: The Business Benefits of Involving Residents*. Available: http://westminsterresearch.wmin.ac.uk/15493/1/AH_final%20report_published_270315.pdf

56 Health Watch, NHS Choice

57 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/628396/Tenant_Involvement_and_Empowerment_Standard.pdf paras 2.2.4 and 2.3.1

how effective current resident scrutiny measures are.

Are current resident engagement and scrutiny measures effective? What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?

74 It is positive to see that the sector is already taking steps towards improving engagement between landlords and residents. The Local Government Association is working with local authority landlords to look at examples of effective empowerment and engagement of their residents. From this they will produce advice and guidance for local authorities. The National Housing Federation is working with housing associations to develop an accountability and transparency offer that includes a trust charter to be developed with tenants, setting out what they can expect from their landlord. We expect the sector to continue to work closely with residents in developing new opportunities to have their voice heard in decisions that affect them.

75 A number of national tenant and resident organisations in the sector have been exploring the option of an independent platform for tenants, based on widespread engagement, to enable them to have their voices heard more effectively at a national level. To be successful it would be important that it represents the voices of a wide diversity of tenants across the country and can win their confidence as an independent resident champion. **Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?**

3.4 Strengthening choice over services

76 Social housing residents do not have the same level of choice on the quality and nature of their housing management services as consumers in other markets. There can be limited options for residents who are dissatisfied with their service, and it can be difficult to 'switch' provider to try a different service.

Residents told us

We informed the housing association that we didn't want the services of the present cleaners, which we pay for in the service charge, but we were told we had no choice in the matter.

77 To date, a number of initiatives have been designed to address this. Local authority tenants have the legal right to seek to take on housing management functions themselves by exercising their statutory Right to Manage. If they are assessed as competent and have the support of tenants via a ballot they can set up a Tenant Management Organisation.

78 We are conscious that, following criticism of the Kensington and Chelsea Tenant Management Organisation after the tragedy at Grenfell Tower, questions have been raised about the capability of Tenant Management Organisations.⁵⁸ We respect the role of the Grenfell Tower Inquiry in examining the actions of the Kensington and Chelsea Tenant Management Organisation. We recognise that there have been different ways of establishing Tenant Management Organisations, as well as varied practice and experiences for residents. We want to understand more broadly how effectively this option is working for local authority tenants, and indeed their range of experiences.

79 In addition to Tenant Management Organisations, there are other ways for tenants and landlords to establish new structures. Local authority tenants have the right to request that their homes are transferred to a housing association, while social landlords are also free to explore alternative governance structures, including community-based models. A small number of local authority landlords have transferred all or part of their stock to newly formed community housing associations enabling residents to take a central part in decision-making and become shareholding members. Some housing associations have taken the decision to restructure as a community-based housing provider on a co-operative or mutual model and to be managed, either entirely or mainly, by their residents.

⁵⁸ Kensington and Chelsea Tenant Management Organisation became an Arms Length Management Organisation in 2002

Case study: Resident engagement

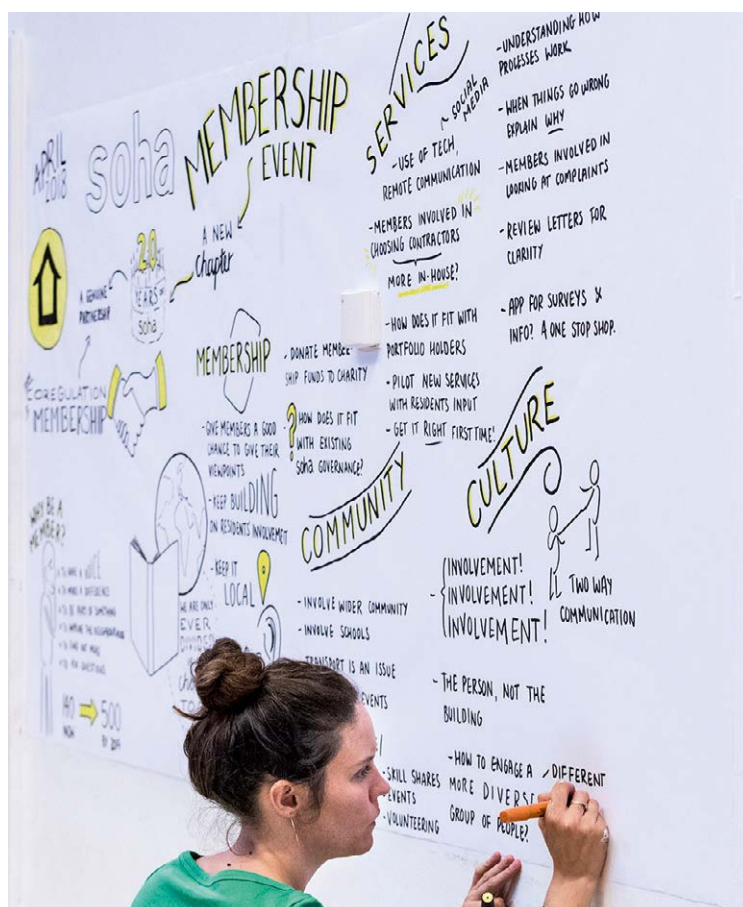


Image © Soha Housing

Soha Housing is a social landlord and a not-for-profit business with over 6,600 homes operating in and around Oxfordshire. It is managed through a system of co-regulation and became a 'mutual' in September 2017, meeting a long-term vision to devolve further control to its residents. While the Board is responsible for the effective running of the organisation, they are held to account by residents who monitor performance. Ultimately shareholding members have the right to vote on the biggest decisions, including Board membership and changes to the rules.

Tenant groups include:

- The Tenants' Forum – a group of 21 elected resident representatives who hold the Board to account and advise on policy;
- The Tenant Scrutiny Group – a 'critical friend' challenging Soha's Board that they are meeting the regulatory standards and Soha's aims and objectives; and,
- The Tenant Auditors – who carry out robust assessments on Soha's performance against service standards. They also write reports that are publically available on request.

When a complaint has exhausted Soha's internal complaints procedure, it may go to an Independent Tenant Panel for review. Tenants are also involved in reviewing the complaints process making sure it is inclusive and fit for purpose.

Soha sees resident engagement as a key part of its success and 90 per cent of residents are satisfied with their service.

80 Our preferred approach is to increase transparency for residents over the performance of landlords, including through key performance indicators and league tables. Following that increase in transparency we want to offer residents greater opportunity to exercise more choice over their day-to-day services, while recognising that landlords need to retain clear oversight in standards, quality and safety, as well as keeping clear control over the value for money of contracts.

81 We are therefore seeking views on options to create the right organisational culture and promote community leadership:

- We are considering a new stock transfer programme to promote the transfer of local authority housing particularly to community-based housing associations. **Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?**
- We are exploring options to demonstrate how community leadership can be embedded in the governance and culture of mainstream landlords, for example through a series of trailblazers to test new models and principles of structure and governance that allow for stronger community leadership. **Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?**
- Around 200 Tenant Management Organisations have been established following tenant ballots to manage homes on behalf of a local authority and their practice, remit and scope varies considerably. It is important that groups have the resources, capacity and capability to take on these significant responsibilities, which they need in order to pass the assessment process. Once an organisation is up and running, tenants have the opportunity through a regular ballot to confirm their support for the Tenant Management Organisation to continue. The management agreement between the local authority and Tenant Management Organisation includes measures to assess their performance and to disband the organisation if there is sufficient evidence of failure in fulfilling its obligations under this agreement. **Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding**

Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?

- **Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?**

82 The amount of choice and control on a daily basis that particular households might want is likely to vary depending on their personal circumstances. Many will not have the time or desire to take over management responsibilities themselves, and might be more interested in smaller scale control over particular services. Housing management comes with significant responsibilities and liabilities, and tenant groups who wish to take more control can need support to build their skills and capacity, as well as the commitment to sustain their role over time.

Residents told us

Many services are unwanted, unnecessary and costly. Giving real choice about what we have to pay for and allowing us to choose would be good.

83 Local Management Agreements have been used by residents to enter into an agreement with their landlord to take control of small-scale services on a voluntary basis. Using these principles, the Community Cashback scheme (later called Give it a Go grants) ran from 2013 to 2015, designed to support social residents to take responsibility for a service within their local community, such as cleaning or gardening, with any savings made to be reinvested into the community. In such examples, residents could choose to provide a service themselves as a group, employ someone to do it or engage a contractor or supplier. **Do you think there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?**

84 We also want to understand better whether satisfaction with contractor services could be increased by encouraging landlords to provide greater choice to residents around services such as repairs and improvements, for example by routinely providing a list of approved contractors for individual tenants to choose from. **How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?**

3.5 Value for money for leaseholders

85 In many ways leaseholders of social landlords have been less affected by high profile abuses in the leasehold market than private leaseholders, such as onerous ground rents, and can benefit from a cap on service charges for capital works. Individuals who are leaseholders in social housing also have access to the Housing Ombudsman to help resolve complaints about the services provided by their freeholder.

86 But they can also experience unique challenges. As there are often fewer leaseholders in a block than social tenants, they can feel their views can be crowded out.

Residents told us

I am a leaseholder. The service charges paid monthly do not reflect a good service i.e. council repairs, cleaning and the quality of it. The local authority should not offer the service if it cannot be completed.

87 A lack of transparency around service charges can lead to fears that leaseholders are cross-subsidising other residents. Consultation over major works can often be seen as failing to obtain meaningful input from leaseholders or to take their views on board, especially when maintenance and repairs are managed through broad framework agreements or longer term contracts. And, unlike in the private market, there is no real sanction for social landlords who do not comply with requests for information because the local authority can be both the landlord and enforcer.

88 Buying out a freehold in a block for those leaseholders (this does not include shared owners where different rules apply) is also often harder in the social sector and can be complicated in a shared block where taking on the freehold may require managing services on behalf of social renters. The qualifying threshold of two thirds of residents being leaseholders and wanting to enfranchise can be a problem as in many cases there will be a mix of renters, shared owners and leaseholders.

89 We are already taking a number of steps to address these issues. The Government has recently announced a significant programme of leasehold reform which will benefit all leaseholders, both in the private and social sectors. This includes restricting future ground rents and making buying a freehold or extending a lease easier, faster, fairer and cheaper. A working group is being established to consider standards around service charges, how they should be presented and to explore the best means to challenge fees which are unjustified. We will also explore how social leaseholders can better input into consultation on major works through our sector advisory group.

What more could we do to help leaseholders of a social housing landlord?

3.6 A stronger Regulator

Understanding what a good service looks like

90 The latest evidence from the English Housing Survey suggests that most tenants are satisfied with housing management services, with 66 per cent of tenants saying they were either very or fairly satisfied with the way the landlord carries out repairs and maintenance.⁵⁹

91 However, it is clear from our engagement events that not all tenants were satisfied with the services they receive, and a significant proportion reported very poor experiences. More broadly, many were also unsure about how to assess the level of service they received from their landlord, because they had nothing to compare it to. We think that a further problem is a lack of clarity over what should be considered a reasonable service.

92 Strong sector-led initiatives play an important role in driving continuous improvement. However, such initiatives must be underpinned by a robust regulatory framework. Annex A sets out the current regulatory framework for social housing in more detail. The Regulator has two objectives covering economic and consumer matters which are underpinned by seven outcome-focused and high level standards that it sets.

59 English Housing Survey 2016/17, Social rented sector report

Box 2 – Existing consumer regulation objective and consumer standards

Parliament has set the Regulator of Social Housing a consumer regulation objective,⁶⁰ which is:

- to support the provision of social housing that is well-managed and of appropriate quality;
- to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection;
- to ensure that tenants of social housing have the opportunity to be involved in its management and to hold their landlords to account; and,
- to encourage registered providers of social housing to contribute to the environmental, social and economic well-being of the areas in which the housing is situated.

The Regulator has published four outcome-based consumer standards to deliver the consumer regulation objective.⁶¹ These are:

- **The Tenant Involvement and Empowerment Standard (July 2017)** which includes a requirement for landlords to provide choices and effective communication of information for tenants on the delivery of all standards, and to have a clear, simple and accessible complaints procedure;
- **The Home Standard (April 2012)** which requires homes to be safe, decent and kept in a good state of repair;
- **The Tenancy Standard (April 2012)** which requires registered providers to let their home in a fair, transparent and efficient way, and enable tenants to gain access to opportunities to exchange their tenancy; and,
- **The Neighbourhood and Community Standard (April 2012)** which requires registered providers to keep the neighbourhood and communal areas associated with the homes that they own clean and safe; help promote social, environmental and economic well-being in areas where they own homes; and work in partnership with others to tackle anti-social behaviour in neighbourhoods where they own homes.

93 The minimum level of service that landlords are expected to deliver to their residents is set out in the consumer regulation objective and the four consumer standards set out in Box 2.⁶² Landlords have flexibility over how they meet the requirements in these standards, which enables them to consider the best approach to meet the needs of residents locally.

94 Resident dissatisfaction with their landlords could stem from the adequacy of the current consumer standards, the way in which they are enforced, or a combination of the two. Unlike the economic standards, the Regulator's ability to enforce the consumer standards is limited by the "serious detriment" test. We want to find out if the consumer regulation objectives and standards need to be changed to help landlords and consumers to understand what a good service looks like, and to

relate them directly to the new key performance indicators that we propose. For example, we could expand the objective on well-managed social housing to require an effective complaints procedure.

Does the Regulator have the right objective on consumer regulation? Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed, and if so how?

95 We also want to know whether landlords and residents would benefit from further guidance on what good looks like, without being overly prescriptive. The Regulator currently issues two Codes of Practice which further develop the requirements of the economic standards and we want to consider if a Code of Practice for consumer standards would be

60 Section 92K of the Housing and Regeneration Act 2008

61 Section 193 of the Housing and Regeneration Act 2008

62 Section 92K of the Housing and Regeneration Act 2008 and Section 193 of the Housing and Regeneration Act 2008

helpful to residents and landlords, to further develop the requirements of the consumer standards.⁶³ **Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?**

Strengthening regulation of consumer standards

96 As well as its role in making sure that homes are safe, we want the Regulator to have the tools it needs to deliver robust oversight of the social housing sector, and we want to ensure that it has all the necessary structures in place to properly regulate and respond to breaches of regulation. We also want to ensure that we have sufficient oversight in place to hold the Regulator to account.

97 The legislation is clear that where a landlord breaches a consumer standard, the Regulator can only use its regulatory and enforcement powers if there is or may be a “serious detriment” to existing or potential tenants.⁶⁴ The Regulator interprets this as meaning where there is “serious actual harm or serious potential harm to tenants”.⁶⁵ This is a higher threshold for regulatory intervention than for breach of economic standards. In addition, the Regulator’s approach to regulation of the consumer standards is reactive,⁶⁶ in that it responds to issues as they emerge, and it does not monitor landlords’ performance on consumer standards.

98 Where a breach of the consumer standards meets the “serious detriment” test, the Regulator will publish a regulatory notice and consider the most appropriate course of action. In the great majority of cases, landlords act quickly and decisively to rectify problems once they are identified, without need for further action. The Regulator is able to use a number of regulatory and enforcement powers where necessary to ensure compliance with the standards, and so far it has only had to use its statutory powers rarely. The key powers are set out in Box 3, and the Regulator has published guidance setting out how it will use its powers.⁶⁷ The Regulator has different tools available depending on the landlord. For example, current legislation does not allow the Regulator to levy fines on local authorities for a breach of standards. In addition, the Regulator does not have the power to look at the governance arrangements of local authorities, since its economic standards apply only to housing associations and other private registered providers.

63 <https://www.gov.uk/government/publications/value-for-money-code-of-practice> and <https://www.gov.uk/government/publications/governance-and-financial-viability-standard-code-of-practice>

64 Section 198A of the Housing and Regeneration Act 2008

65 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698332/Regulating_the_Standards_April_2018.pdf

66 *ibid*

67 <https://www.gov.uk/government/publications/guidance-on-the-regulators-approach-to-intervention-enforcement-and-use-of-powers>

Box 3 – Key regulatory and enforcement powers of the Regulator of Social Housing

Power	Applicable to private registered providers ^a	Applicable to local authority landlords
Survey to assess the condition of stock	✓	✓
Inspection to establish compliance with the regulatory requirements	✓	✓
Hold an Inquiry where it suspects landlord mismanagement	✓	✓
Issue an Enforcement Notice	✓	✓
Issue Fines	✓	
Order payment of compensation to a resident	✓	
Appointment of manager to improve performance of the landlord	✓	
Transfer land to another provider to improve management of land (following an Inquiry)	✓ ^b	
Suspension and removal of officers in cases of mismanagement (during or after Inquiry)	✓ ^c	
Appoint a new officer to address service failure and improve management of company	✓ ^c	
Appoint an adviser to improve performance		✓
Requirement to tender some or all of its management functions	✓	✓
Requirement to transfer management of housing to a specified provider	✓	✓

a) This includes registered charities, housing associations and “for-profit” private sector landlords, b) Does not apply to registered charities, c) Applies to not-for-profit providers only

99 We wish to consider a number of possible regulatory changes to enable consumer standards to be enforced in a similar way to the economic standards. This would enable the Regulator to take a more rigorous and proactive approach to enforcement, like other regulators such as Ofsted. We want to ensure the “serious detriment” bar does not prevent the Regulator from taking a more proactive approach, and if it does, then we will consider removing it. At the same time, we are clear that the Regulator should continue to focus on cases of persistent and/or serious failure by landlords, leaving individual complaints to be addressed through the landlord’s own complaints process and the

Housing Ombudsman. **Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?**

100 To support a more proactive approach to enforcing the consumer standards we are considering arming residents with information through the introduction of a number of key performance indicators and for landlord performance to be published. Our current thinking is that the Regulator should monitor the key performance indicators to identify where there may be issues of concern with

performance. The Regulator would then be able to make a risk-based assessment of how and where to intervene, including through more regular or phased interventions. This could take the form of greater use of its powers to carry out surveys of homes where there is a potential problem with their condition, or inspections of the landlord's financial affairs where landlords consistently fail to provide an adequate service to residents. **Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?**

101 We want to make sure that regardless of whether someone is a resident of a housing association or a local authority, the same minimum standards of service apply. The Government respects the democratic mandate of local authorities but this must be balanced with the need to ensure that residents are protected. **Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?**

102 We also want to improve the enforcement tools available to the Regulator to intervene where there is a consistently inadequate level of service. Given the requirement that action taken by the Regulator should be proportionate, we would still expect these powers to be used only when necessary. **Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?**

103 As part of examining the scope of the Regulator's role we want to consider the case for extending its remit to other organisations that manage social housing. For example, around 200 Tenant Management Organisations and 34 Arms Length Management Organisations are in operation to manage homes on behalf of a local authority, which remains the landlord. The Regulator will hold the local authority landlord to account for the way the services are delivered, so it is vital that the local authority has good oversight arrangements in place to ensure that management organisations provide a good

service. There is a further question about whether more is needed to set out the accountability of the landlord for management services that are outsourced, or whether the Regulator should have direct oversight of how these management organisations operate.

Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?

104 As we look to strengthen consumer standards, we need to make sure that the economic regulatory regime remains strong. Consumer and economic regulation need to reinforce and complement each other for the regulatory framework to work effectively. The regulatory review will look at how we can best deliver this outcome.

105 We want to be clear and transparent about how the Regulator is accountable to Parliament for meeting its statutory objectives. The Regulator is currently part of the Homes and Communities Agency, but upcoming legislative changes will shortly establish it as a standalone Non-Departmental Public Body.⁶⁸ As such it will be accountable to Parliament in the same way as other Non-Departmental Bodies.⁶⁹

106 As we develop the arrangements for the new organisation, we plan to review whether this standard approach needs to be tailored to the specific circumstances of the Regulator. **What further steps, if any, should Government take to make the Regulator more accountable to Parliament?**

107 These proposals will mean a greater role for the Regulator in ensuring landlords deliver better services to their residents. We want to make sure that the Board of the Regulator contains the right level of experience and skills to cover the functions that it carries out. As the existing Regulation Committee of the Homes and Communities Agency looks to make new appointments, it will seek to recruit someone with extensive experience of consumer regulation.

68 <http://www.legislation.gov.uk/ukdsi/2018/9780111166475/contents>

69 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/690951/Public_Bodies_-_a_guide_for_departments_-_chapter_8.pdf

Questions

12. Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?
13. Should landlords report performance against these key performance indicators every year?
14. Should landlords report performance against these key performance indicators to the Regulator?
15. What more can be done to encourage landlords to be more transparent with their residents?
16. Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?
17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?
18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?
19. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord? What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?
20. Are current resident engagement and scrutiny measures effective? What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?
21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?
22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?
23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?
24. Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?
25. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?
26. Do you think there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?
27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?
28. What more could we do to help leaseholders of a social housing landlord?
29. Does the Regulator have the right objective on consumer regulation? Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed, and if so how?
30. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?

31. Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?
32. Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?
33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?
34. Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?
35. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?
36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?



Chapter 4: Tackling stigma and celebrating thriving communities



Image © Clive Lawrence

Residents told us

It's time we looked at the problem of stigma.

108 Stigma was the most consistent theme raised by residents at the engagement events. Residents told us that they were made to feel like “second-class citizens”. They reported being treated as “an underclass” and “benefit scroungers”, rather than hardworking and honest people. Some residents told us of a “demonisation” of social housing and their communities in the media. There has been a stark failure to recognise and celebrate the best examples of community spirit in social housing in the same way that people take pride in the NHS. We agree that we should take pride in the best of our social housing, and that this Green Paper offers an opportunity for a change in the way social housing residents are treated, viewed and respected.

109 These experiences are not unique to the residents we spoke to. Research by Shelter shows that 24 per cent of families in social housing feel looked down on because of where they live, compared with only 8 per cent of families who are private renters or homeowners.⁷⁰ 90 per cent of social housing residents say the media portrays a stereotype of them.⁷¹

Residents told us

[I am] stigmatised for being in social housing and treated as a second-class citizen.

I am made to feel less of a person than the person that has bought their house.

[My main concern is] the perception of council tenants as benefit scroungers when there are many tenants who are hardworking, honest people.

⁷⁰ https://england.shelter.org.uk/media/press_releases/articles/shelter_launches_new_social_housing_commission

⁷¹ <http://benefittosociety.co.uk/wp-content/uploads/2018/02/B2S-publication-final.pdf>

110 Residents of social housing and their communities have felt stereotyped for years. It was common to hear from residents that others assume they are unemployed, lacking aspiration or involved in anti-social behaviour. Some reported being treated with the most basic lack of respect or courtesy by their landlords.

111 It is clear from the engagement events and research that these prevailing stereotypes and prejudices are not a true reflection of the reality. 72 per cent of the public over-estimate the number of people in social housing who are unemployed.⁷² Contrary to stereotypes, the English Housing Survey shows that 7 per cent of social housing residents are unemployed compared with 4 per cent in the private rented sector.⁷³

112 We recognise that public perceptions have contributed to the stigma felt by residents. Residents told us that for decades politicians and the media have contributed to the problem with some of the negative language they have used, which can have a lasting impact on how social housing and its residents are perceived.

113 This Government is determined to tackle such prejudice to ensure that the positive contribution that social housing residents make to their communities, and to society as a whole, is recognised.

114 The proposals in this Green Paper to rebalance the relationship between residents and landlords, along with our proposals to increase supply, will contribute towards changes in attitudes over time. This chapter looks at further ways to tackle this stigma.

4.1 Celebrating thriving communities

115 We want to celebrate the thriving communities that exist across the country with social housing at their heart. In doing so, we can learn from their success and challenge misleading stereotypes about neighbourhoods with social housing. We heard from many residents that they feel fortunate to live in social housing and take great pride in their homes and

the communities in which they live. We must recognise the important contribution social housing residents make to the vibrant and diverse communities that make up our country.

116 We have seen great examples of activities led by residents that are making a positive difference including gardening projects, household recycling schemes and buddying activities to tackle social isolation.

117 We want to celebrate the role of residents in shaping fantastic places by recognising the best neighbourhoods. Awards could include investment to support successful initiatives to grow, or funding for an event or a street party to bring people together across housing tenures and generate a sense of pride. **How could we support or deliver a best neighbourhood competition?**

118 Too many residents across the country talked of the stigma of social housing, when they actually saw themselves as ambitious and hardworking. We need to do more to explain and value the diversity of residents in social housing – from the most vulnerable who need support, to the majority of adult residents working and those supporting vital services like the NHS.

119 We want the stories told about social housing to reflect the experiences of residents and the contribution they make to their communities and wider society. If we can do that, we can begin to tackle the stigma faced by many of the 3.9 million households living in social housing.

120 The 'See the Person' campaign, previously known as 'Benefit to Society', promotes positive stories about social housing residents. Residents have shared a wide range of stories about their lives and the contribution they make to society. Hundreds of people have pledged their support to the campaign including residents, landlords, politicians and journalists, and we encourage others to do the same.

121 **In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?**

⁷² YouGov online survey of 2,075 adults carried out on behalf of Soha Housing. Fieldwork was undertaken between 16-19 February 2018. The figures have been weighted and are representative of all GB adults (aged 18+).

⁷³ English Housing Survey 2016/17

Case study: Tackling stereotypes of social housing residents



Images © Soha Housing

'See the Person' is an independent tenant led campaign sponsored by more than 30 housing organisations across the country, which aims to tackle the common misrepresentations of people living in social housing. Research has shown that this stigma has damaging effects on individuals and communities. The campaign aims to tackle stigma by changing the language, range of stories and images used by the media and the public. It has published a *Fair Press* guide for journalists, asking for fair and representative coverage. Tenants leading the campaign have worked with their local media and political representatives, asking them to pledge their support. Campaigners have sought to reach people with no direct experience of social housing to present a more accurate picture of the people living in social housing by sharing the stories and experiences of social housing tenants and highlighting their contributions to society. The campaign asks people to 'see the person' irrespective of tenure. It brings together residents, housing associations, local authorities and Arms Length Management Organisations to ask politicians, social landlords and members of the public to pledge their support to tackling stigma.

4.2 Embedding good customer service and neighbourhood management

122 Too many residents felt they were treated with contempt by their landlord – that they were spoken down to, or treated as a nuisance, and that this contributed to a sense of stigma. This cannot be tolerated.

Residents told us

If you ring the helpline you are treated with contempt and talked to as though you are a child who knows absolutely nothing.

Being spoken to by staff on the phone in a condescending manner, it's sometimes humiliating and always demoralising.

I work full time but the council assume all council tenants don't work and are available to sit around for all day appointments, [it's] ridiculous the amount of holiday and unpaid leave I've taken.

123 We want to embed a customer service culture and attract, retain and develop the right people with the right behaviours for the challenging and rewarding range of roles offered by the sector. Some sectors have found that professional qualifications or industry codes of practice support this. We want to encourage professionalisation, building on the work already delivered by organisations such as the Chartered Institute of Housing. **What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?**

124 Landlords have an obligation to meet the Neighbourhood and Community Standard. This includes cooperating with partners to promote social, environmental and economic wellbeing to prevent and tackle anti-social behaviour in neighbourhoods where they own homes.⁷⁴

125 It is clear that residents do not feel landlords are consistently meeting this standard. Therefore we are considering introducing a key performance indicator that will capture how well landlords undertake their neighbourhood management responsibilities. **What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?**

Residents told us

They are very tenant and community minded and have great Community Development and Tenancy Services Teams. They encourage and support community involvement. They take into account the 'all round' wellbeing of all tenants and their properties.

The landlord organises occasional social events and has given out hampers to over sixty-fives for the festive season.

The greatest thing however is making sure our community is well informed and have the choice to get involved in all community activities through our community centre, a vital social aspect, especially of sheltered housing, that [the social landlord] excels at. The local volunteers are just wonderful, and are very dedicated to helping tenants who are old, infirm and vulnerable in not feeling so isolated. Our community centre has become a vital hub of human contact for those who live alone.

126 Some landlords are clearly going beyond meeting regulatory requirements. This can include providing employment support and signposting to vital services. Landlords have told us that investing in these wider activities can deliver many benefits, including building trust between the landlord and residents.

127 Many residents shared positive experiences including community activities that supported participation and community centres which acted as a hub for information and social interaction. Black, Asian and minority ethnic residents told us they particularly valued these additional services which helped to break down barriers between residents and

⁷⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419766/Neighbourhood_and_Community_Standard_2015.pdf

support everyone in developing important skills. This included activities such as training, language classes and cultural festivals which play a significant role in encouraging integration.

128 Housing associations play an important role in the financial inclusion of residents, including through offering financial guidance, signposting to affordable credit providers and offering furniture rental through initiatives such as the Newcastle Furniture Service. This activity increases the financial resilience of residents and helps to build stronger communities.

Case study: Poole Housing Partnership



Image © Lisa Mirkhandan, Poole Housing Partnership

Poole Housing Partnership runs a programme of residents' inspections against a range of criteria including litter, cleanliness and quality of green spaces.⁷⁵ Results are used to inform investment decisions in partnership with the local authority. In 2017, work was undertaken to install new fencing, create new bin storage areas, widen roads and carry out resurfacing works. Poole Housing Partnership has also undertaken 'tidy up' days where skips were provided so that residents were able to dispose of their bulky waste.⁷⁶ The grading system has been very successful, allowing Poole Housing Partnership to benchmark its performance against other organisations whilst enabling a greater focus of neighbourhood management and resources on those areas where it is most required.

⁷⁵ <https://www.yourphp.org.uk/residents-and-leaseholders/resident-involvement/estate-gradings/>

⁷⁶ PHP Estate Grading Report 2017

129 What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?

130 Some residents were concerned that their landlords were not taking appropriate action to tackle anti-social behaviour. Residents told us that they felt their concerns were not taken seriously or were resolved too slowly. This created tension in communities and resulted in residents feeling unsafe in their homes.

Residents told us

[My main concerns are] anti-social behaviour from neighbours and over offending behaviour taking place next door to where I live, seemingly with little my housing provider can do about this.

[My main concern is] safety: it is important that tenants (and all residents) feel safe both in their homes and in the communities they live, particularly when raising families and children.

131 Local authorities and housing associations have a range of powers to tackle anti-social behaviour. Landlords are required to publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour in areas where they own and manage properties.⁷⁷ Informal interventions can be used by housing providers, offering a proportionate response to first-time or low-level incidents and a chance to intervene early to prevent behaviour from escalating, for example, warning letters, acceptable behaviour contracts and mediation.

132 Proposals in this Green Paper, including those to strengthen regulation, will help tackle anti-social behaviour. In addition we are considering introducing a key performance indicator to help tackle anti-social behaviour, but we will want to consider how this could impact on areas, and whether it could lead to some people feeling more stigmatised. **How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?**

4.3 Promoting good design

133 The design and quality of homes and their surrounding area is important to wellbeing, integration, tackling stigma and encouraging existing communities to accept new homes in their area. 84 per cent of residents report that better quality buildings and public spaces improve people's quality of life. The same proportion thought living in a well-designed community improves people's happiness.⁷⁸

134 Some residents told us they were concerned that the design and quality standards of new affordable homes are being compromised to reduce costs. They also felt that the attitudes of developers contributed to them feeling marginalised. In some cases, developments have separate entrances for social and private residents. In others, social housing can be too easily identified, for example through different coloured front doors to private properties on mixed tenure estates.

Residents told us

The structures that are being built are lacking modern style.

[My main concern is] the lack of improvement in housing from an architectural perspective. Homes are made...but are the mistakes learned, i.e. where badly thought out room spaces don't work are they improved?

⁷⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419766/Neighbourhood_and_Community_Standard_2015.pdf

⁷⁸ <https://policyexchange.org.uk/wp-content/uploads/2018/06/Building-More-Building-Beautiful.pdf>

135 We want to ensure that good design is applied regardless of tenure. Earlier this year Ministers held the first Design Quality Conference, calling on industry to embrace the latest innovations to make sure we are building the good quality and well-designed homes that our country needs.

136 The Prime Minister has announced missions to cut the energy use of new buildings by at least half by 2030 and to ensure that people can enjoy at least five extra healthy, independent years of life by 2035. The success of both of these missions depends on innovation in housing. We need to provide clear leadership to make sure that new buildings are safe, high quality and more efficient. Homes must support healthy, independent living for an ageing population by being flexible for changing needs.

Case study: Good design in the social sector



Image © Nick Kane

Peabody's Darbshire Place at the historic Whitechapel Estate, is an example of good quality social housing. Designed by Niall McLaughlin Architects, the building completes an arrangement of six housing blocks surrounding an internal courtyard, and respects the form and characteristics of the existing Victorian buildings on one of the oldest Peabody estates.

The scheme comprises 13 family homes, all of which are social housing. The design is sympathetic to its context, has a simple form and appearance and addresses the day-to-day needs of residents.

The project was shortlisted for a Stirling Prize in 2015 and won a RIBA regional and national award.

Case study: Mixed tenure sustainable communities



Image © Tim Crocker

Derwenthorpe is a mixed tenure, exemplar sustainable community of 540 high-quality, energy efficient homes. With 40 per cent for rent and shared ownership and 60 per cent for private sale, all houses are designed to the same standard and with the same appearance regardless of tenure. The affordable homes are integrated with other tenures across the whole site, avoiding grouping of tenure and promoting equality and diversity. The project has won numerous awards for its design approach and its social and environmental sustainability credentials.

137 The revised National Planning Policy Framework which was published in July, is clear that the Government is committed to ensuring the planning system can deliver high quality buildings and places.⁷⁹ The National Planning Policy Framework sets out policies which make clear that:

- plans or supplementary planning documents should use visual tools such as design guides and codes, to provide a framework for creating distinctive places with a consistent high quality standard of design;
- planning policies and decisions should ensure that developments are visually attractive and will function well and add to the overall quality of the area;
- the local character and history should be considered, to ensure a strong sense of place is created. This is important to make sure we are developing distinctive places to live, work and visit, but this should not prevent or discourage appropriate innovation or change; and,

- accessibility and provision of local and green infrastructure and amenities should also be a key consideration, as well as the density and mix of uses. This is important to make sure that places are safe, inclusive, well-connected, facilitate social interaction, support healthy lifestyles and promote a high quality of life for the community, whilst also delivering the number of homes needed.

138 We want to ensure this is applied to social housing in the right way, as part of the guidance which will be published later this year. In particular we will:

- strengthen planning guidance to take into account the principles of Secured by Design: to ensure that external spaces, parks, streets and courts are well-lit and well maintained so they are safe from crime and the fear of crime;
- strengthen guidance to encourage healthy and active communities: building on the National Planning Policy Framework's healthy and safe communities chapter;

⁷⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

- strengthen guidance to encourage new affordable homes to be designed to the same high-quality as other tenures and well-integrated within developments; and,
- encourage design that reflects changing needs: for example, inclusive design for an ageing population and family housing at higher densities for effective use of land.

What other ways can planning guidance support good design in the social sector?

139 We heard from residents that they often feel a strong sense of community in the areas they live precisely because there is social housing. Residents will often have the best insights into the opportunities and challenges their neighbourhoods present. We want to give residents a stronger voice in the design, delivery and on-going management of social housing by helping to develop the skills for effective participation – particularly in leading, or engaging with, existing community-led housing developments.

140 Neighbourhood planning already gives communities power to agree and implement a shared vision for their neighbourhood. Since 2012 over 2,200 groups have started the neighbourhood planning process, in areas that cover over 12 million people.⁸⁰

141 However, the Government is aware that too often local people hear about schemes after a planning application has been submitted. The revised National Planning Policy Framework makes clear that communities should be engaged early in shaping local design policies. Our new 2018-2022 £23 million support programme will provide the resources and expertise that communities may need to plan for the future of their areas.⁸¹ **How can we encourage social housing residents to be involved in the planning and design of new developments?**

Questions

37. How could we support or deliver a best neighbourhood competition?

38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?

39. What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?

40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

41. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?

42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?

43. What other ways can planning guidance support good design in the social sector?

44. How can we encourage social housing residents to be involved in the planning and design of new developments?

⁸⁰ <https://www.gov.uk/government/news/228-million-boost-to-give-power-back-to-communities>

⁸¹ *ibid*



Chapter 5: Expanding supply and supporting home ownership



142 Our Housing White Paper set out our plans to fix the broken housing market and deliver the homes that this country needs.⁸² We have set a challenging goal to deliver 300,000 homes a year by the mid-2020s. The last time we built homes at this sort of scale, social housing made up almost half of the total.⁸³ Social housing remains central to our supply ambitions. It can be built out more quickly because it does not rely on the mortgage market, can provide up-front funding to unlock sites, and can ensure new homes are acceptable to local people.

Residents told us

[There is] not enough social housing being built, where will my children live? They cannot afford a mortgage and private renting is too expensive with no security.

I will never get on the property ladder as I'm unable to save for a deposit at the same time as paying rent.

143 There remains a long term need for social housing, especially in London and the South East. However we acknowledge that there are housing pressures in other places too, including rural areas. It is worth bearing in mind that, while social housing supports some of the most vulnerable in our society, 58 per cent of working age social tenants are in work.⁸⁴ For many such working tenants, particularly those living in areas of acute affordability pressures, the reality of housing costs will make renting in the private sector or saving for a deposit more difficult.

144 Social housing provides a stable base that supports people when they need it. But our social housing offer must also be one that supports social mobility – not one that provides a barrier to aspirations. Around two thirds of social tenants would prefer to be home owners given a free choice.⁸⁵ This is not surprising as ownership provides people with greater control over their home and access to a valuable asset.

82 <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>

83 MHCLG Live Table 244

84 English Housing Survey 2016/17

85 MHCLG (2018) Public attitudes to house building: findings from the British Social Attitudes survey 2017

145 Since the introduction of Right to Buy nearly 2 million households have been helped to become home owners,⁸⁶ but still less than one third of social renters expect to realise these aspirations.⁸⁷ In our conversations with residents, some said they wanted to access the Right to Buy offer that had been promised, or think that they would like to take advantage of it in the future, while others were concerned that the homes being sold are not being replaced quickly enough. Some of those who had bought through Right to Buy mentioned that home ownership would have been impossible for them without the scheme. We want to continue to help people become home owners. Equally, given high property prices and rents in the private sector, we are mindful that we will need to replenish the stock of subsidised housing for the foreseeable future. The fundamental challenge is to reconcile our ambition to extend the opportunity of home ownership to as many social tenants as possible, with the responsibility to maintain and increase the stock of social housing for those who need it.

Residents told us

[My main concern is a] lack of replacement of homes sold as a result of right to buy. This will end up with no places for people who need and can't afford to buy their own homes in the private market.

The right to buy option meant that when the houses were sold that money was not available to local councils to reinvest in more dwellings. I feel this has been a large factor leading to not enough social housing being built.

146 To deliver the social homes we need, central and local government, housing associations, private developers and others must pull together and radically increase the number of homes built every year. This chapter sets out our vision to:

- help local authorities build by allowing them to borrow, exploring new flexibilities over how they spend Right to Buy receipts, and not requiring them to make a payment in respect of their vacant higher value council homes;
- unlock additional supply through community land trusts and local housing companies;
- actively investigate how to provide longer term certainty to help housing associations build more; and,
- help people living in affordable home ownership schemes progress more easily to owning outright.

5.1 We will support local authorities to build more

Residents told us

[I'm concerned] that there may not always be council homes for my grandchildren. You never know what life throws at you.

147 We have built more council homes since 2010 than in the previous 13 years.⁸⁸ However building remains at a low level when compared to the peak of council house building – when local authorities delivered nearly half of new homes.⁸⁹ Local authorities have identified barriers preventing them building new homes:

- restrictions imposed by the Government on their ability to borrow money to fund house building;
- uncertainty about the level of rent that they can charge residents from 2020/21; and,
- limitations on how they are able to use their receipts from homes sold under the Right to Buy.

148 To address the barriers to local authorities building – and deliver the Prime Minister's commitment to a new generation of council house building – we are already taking action by:

86 Table 678, <https://www.gov.uk/government/statistical-data-sets/live-tables-on-social-housing-sales> and Table 1, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/695299/Right_to_Buy_sales_in_England_2017_to_2018_Q3.pdf

87 English Housing Survey 2016/17

88 <https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>

89 MHCLG Live Table 209

- announcing that we will raise the housing borrowing cap by up to £1 billion in areas of high affordability pressure;⁹⁰
- giving landlords much greater confidence and certainty in their future rental income through the new rent settlement of Consumer Price Index +1 per cent to 2025;⁹¹ and,
- publishing a consultation on how local authorities can use the money raised from Right to Buy sales to help them build more homes.

We want to use this Green Paper to explore how we could go further.

Raising the housing borrowing cap

149 We have heard from local authorities that they can and want to build more of the homes people need, but are constrained by the borrowing cap. The overall housing borrowing cap for local authorities is set at £29.8 billion, and there is currently £3.6 billion of borrowing headroom available to local authorities in total,⁹² but this capacity is not always in the areas where local authorities are ready and able to build. In reality, many local authorities, especially those who are more ambitious and have already borrowed to build, have very little headroom left to borrow. 47 local authorities have less than 5 per cent of their borrowing headroom available,⁹³ so they simply cannot build any new council homes.

150 We will use the new £1 billion borrowing programme to measure the appetite and ambition of local authorities and their effectiveness at building new homes, with a view to considering whether further reforms are needed. We must also weigh the continuing need to drive down public sector debt. We hope to see the borrowing programme fully subscribed and to receive evidence of a wide range of proposals from local authorities for new development.

151 Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the Government's current arrangements strike the right balance between providing grant funding for housing associations

and Housing Revenue Account borrowing for local authorities.

Reforming Right to Buy Receipts

152 We are publishing a consultation paper alongside this Green Paper which sets out proposed changes to the way local authorities can use Right to Buy receipts to deliver new homes. We are considering allowing local authorities to keep the Right to Buy receipts they already hold for longer than the current three years to ensure the receipts can be used alongside the borrowing cap increase. We are also considering allowing a greater proportion of the cost of new Social Rent council homes in areas of high affordability pressure to be met through Right to Buy receipts and to allow greater flexibility over the tenure of replacements – to include shared ownership as well as Affordable Rent and Social Rent. We are seeking view on these and other options and welcome input to the consultation which was published alongside this Green Paper and can be found at: <https://www.gov.uk/government/consultations/use-of-receipts-from-right-to-buy-sales>.

Giving Local Authorities confidence to invest in home building

153 We have also been listening to councils about their concerns that the Government may decide to implement provisions contained in the Housing and Planning Act 2016 which would mean they have to make a payment in respect of their vacant higher value council homes and return some of the funds raised to the Government. Many councils have told us that without knowing for certain whether this policy might be implemented in future years, it is difficult to make long term investment decisions. The Government remains committed to the principle that councils should use their housing assets effectively and should consider selling high value homes and using the funding to build more affordable housing. However, this should be a decision to be made locally, not mandated through legislation and we understand that the uncertainty around the future of this policy could prevent councils from building. Therefore to increase councils' confidence to plan ambitious house building programmes, we are confirming in this Green Paper that the Government will not bring the Higher Value

90 <https://www.gov.uk/government/topical-events/autumn-budget-2017>

91 <https://www.gov.uk/government/news/2-billion-boost-for-affordable-housing-and-long-term-deal-for-social-rent>

92 MHCLG Local authority revenue expenditure and financing England: 2016 to 2017 individual local authority data – outturn <https://www.gov.uk/government/statistics/local-authority-revenue-expenditure-and-financing-england-2016-to-2017-individual-local-authority-data-outturn>

93 ibid

Assets provisions of the Housing and Planning Act 2016 into effect. We will look to repeal the legislation when Parliamentary time allows.

The role that local housing companies can play

154 Housing companies can be an effective way to deliver new homes that the private sector is not delivering or that local authorities cannot deliver through their Housing Revenue Account. Generally, local authorities should deliver new affordable housing through their Housing Revenue Account. However, there are occasions where delivering these homes through housing companies might be appropriate. This could include situations where local authorities do not have a Housing Revenue Account because they have previously transferred their stock, or where the Housing Revenue Account cannot sustain new building. In these circumstances, local authorities should consider whether they could transfer new affordable homes to a registered provider once they are complete.

155 Where a local authority applies to us for consent to dispose of more than five council homes to a local housing company, we will want to see proposals which maximise the number of affordable homes and increase the overall level of housing supply. In these situations a company might support bringing existing social homes back into use or be able to replace them with higher numbers, or a more appropriate mix, of homes.

156 The Government believes it is important that social housing residents have the opportunity to realise their aspirations and become homeowners. Where housing companies are delivering and retaining affordable homes we would expect them to offer an opportunity for tenants to become homeowners. Where our consent is required for schemes to go ahead, local authorities should explain how they plan to make a home ownership offer to tenants of any new affordable homes.

5.2 Community-led housing

157 Community-led housing is about local people playing a leading and lasting role in solving local housing problems, creating genuinely affordable homes – including for ownership – and strong communities. The very fact that community-led

housing enjoys the support of local people helps unlock sites for new homes. This has been particularly successful in rural areas and on smaller sites where other developers are unwilling to build.

158 In 2016, we awarded £60 million in grants under the Community Housing Fund to 148 local authorities most affected by local affordability issues.⁹⁴ We have now launched a new £163 million Homes England programme to deliver the Community Housing Fund outside London.⁹⁵ The programme will provide revenue funding for community groups bringing housebuilding projects forward and capital funding for local authorities to provide local enabling infrastructure (such as access roads). As part of this programme, Homes England is also developing a new capital funding product that is suitable for the tenures used in community-led housing.

Residents told us

Housing Co-ops are a great way to live. For the tenant there is power, rather than relying on an external landlord, we can deal with issues as they arise, and take responsibility for getting things done... It would be great if this way of living was more widespread, so that more tenants had direct control over their own housing.

The landlord is governed by a Board made up of a majority of residents, who are elected by members. This works because those who are most affected by decisions such as rent setting, service provision and new developments have the final say on those decisions. Board members are doubly accountable to their tenants because they live next door to them and are accountable to them via elections.

159 The level of new housing delivery from the community-led housing sector in England is much lower than in comparable countries in Europe and North America, where several per cent of overall new homes is not unusual.⁹⁶ **How we can boost community-led housing and overcome the barriers communities experience to developing new community owned homes?**

94 <https://www.gov.uk/government/news/60-million-boost-for-communities-affected-by-second-homeownership>

95 <https://www.gov.uk/government/collections/community-housing-fund>

96 'Housing Cooperatives Worldwide' 2017 Available: <http://www.housinginternational.coop/housing-co-operatives-worldwide/>

Case study: Rame Cross, Cornwall



Initiated and led by a Wendron Parish Council based housing working party, Cornwall Community Land Trust negotiated a land deal, designed and prepared a brief and secured planning permission for this 16 affordable home project in Rame Cross, a rural village in West Cornwall. Cornwall CLT then partnered with Coastline Housing Association to build the homes. The project received £378,000 from the Community Housing Fund which was critical to the scheme's delivery.

The houses are a mixture of affordable rent (11) and shared ownership (5), with the dwellings a mixture of bungalows and houses. The land is owned by Cornwall CLT and leased to the housing association. Construction finished in March 2018 and all dwellings are now occupied.

Resident-led estate regeneration

160 At the resident engagement events many raised concerns about the process and benefits of estate regeneration. We know that this can be an uncertain and anxious time for residents with some telling us that they feel like regeneration is something that is "done to them", that they do not have enough say over what is going to happen to their homes and their estate. We also know that when done well residents talked of estate regeneration providing opportunities to improve the quality of their lives and provide good quality homes.

161 Building on the good practice set out in the Estate Regeneration National Strategy, we will explore how the £400 million Government investment announced at Budget 2017 can attract wider local public and private investment into estates and the surrounding communities to create new and improved homes and more opportunities for local residents to be partners in the process and benefit directly from the changes. We will work with public, private and community sector partners to better understand how public and private investment can lead to improved social and economic outcomes for the existing community.

5.3 Helping housing associations and others develop more affordable homes

162 The Government recognises and values housing associations as important partners in delivering new affordable homes, as well as for their role in boosting social mobility through successful affordable home ownership products.

Residents told us

I feel privileged and lucky to be a housing association tenant, having an affordable, secure and quality home means everything and has helped me into employment and the security has also helped my children be happy and successful. My eldest has completed university and is in full time employment. My 18 year old also has a full time job. My youngest is settled and doing well in a local school.

163 We are already investing over £9 billion in our Affordable Homes Programme, including an additional £2 billion announced by the Prime Minister in October 2017, alongside flexibility to deliver Social Rent. We announced on 26 June 2018 how we will deliver a further 23,000 affordable homes outside of London, including at least 12,500 at Social Rent in the areas of highest affordability pressure.⁹⁷ This represents a real change in how we focus the Government's grant funding – targeting affordable homes to the areas where they are most needed. The programme will support the delivery of over 250,000 homes of a range of affordable tenures by March 2022.

164 Government funding is of course not the only source of investment for new affordable housing; indeed, capital grant only meets a minority of the cost of development. Housing associations invest significantly in the delivery of new affordable homes – particularly through private borrowing and their own resources. The Government has made it easier for housing associations to access the lending markets in order to develop affordable housing by:

- giving landlords much greater confidence and certainty in their future rental income through the new rent settlement of Consumer Price Index +1 per cent to 2025;
- guaranteeing £3.25 billion of borrowing under the Affordable Housing Guarantee Scheme; and

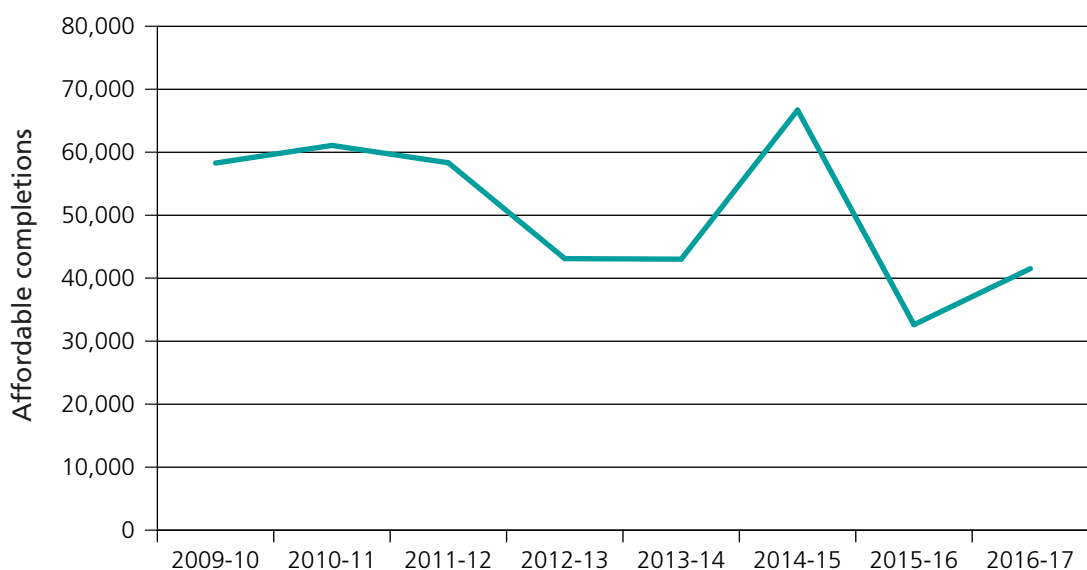
- implementing deregulatory reforms to give housing associations greater freedom over how they run their organisations and use their resources.

Longer term certainty

165 The Government has delivered capital investment in social housing for many years, but the stop-start nature of programmes has led to peaks and troughs in delivery. Housing associations and others tell us this makes it more difficult to plan ahead over the longer timeframes needed to build more affordable homes. This affects the risk appetite of their Boards and slows down the pace of delivering new homes. Government has also been told by developing housing associations that these peaks and troughs can affect the cost of labour and materials, providing poorer value for taxpayers' money, as providers rush to meet deadlines at the end of programmes.

166 We want to give housing associations and others the certainty they require to develop ambitious plans to deliver the affordable homes this country desperately needs. We have already announced strategic partnerships with eight housing associations up to 2022. Government will actively investigate the benefits of going further by providing funding certainty to some housing associations over an even longer period.

Figure 7: Affordable housing delivery, 2016/17⁹⁸



⁹⁷ <https://www.gov.uk/government/news/brokenshire-confirms-social-housing-investment-boost>

⁹⁸ MHCLG Live Table 1000

167 The eight strategic partnerships announced on 3 July 2018, will deliver an extra 23,500 homes by 2022 over their previous plans, including 14,280 additional affordable homes.⁹⁹ The Greater London Authority is also building strategic partnerships with ambitious housing associations to increase the number of affordable homes built over a longer time period.

168 These strategic partnerships demonstrate that funding certainty can make a real difference to how many affordable homes are delivered. This will support housing associations to further increase their delivery to meet the Government's overall supply ambition of 300,000 homes by the mid-2020s.

169 The Government seeks views on the impact of providing longer term certainty over investment.
What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

The role of guarantees in supporting new affordable housing

170 At Budget 2017 the Chancellor announced £8 billion worth of new guarantees to support new housing supply.¹⁰⁰ Through our extensive market engagement in recent months, housing associations have told us that the previous Affordable Housing Guarantee Scheme was helpful, particularly for smaller and medium-sized providers who are less well placed than the larger associations to access the capital markets in their own right. We have taken on board that providing access to the capital markets in the way the Affordable Housing Guarantee Scheme previously did would help support more affordable homes to be built.

Ensuring a strong regulatory environment

171 The economic regulatory regime is crucial to securing the confidence of lenders. We know that mergers and acquisitions have resulted in some very large developing housing associations, which are important to delivering the homes people need. In addition, different types of landlords are being set up and new business models are being developed. These include "for profit" companies (who, unlike housing associations, do not have to reinvest their profits into

their stock and new homes), and housing associations which exclusively lease rather than own all their properties.

172 To ensure that the economic regulatory regime remains strong and the consumer regulation meets our expectations for residents, we are undertaking a review of regulation. We will also be looking at how economic regulation can continue to provide lenders with the assurance they need to invest in new affordable homes. We welcome input to the call for evidence which was published alongside this Green Paper and can be found at: <https://www.gov.uk/government/consultations/review-of-social-housing-regulation-call-for-evidence>.

Unlocking more affordable homes

173 The Government remains committed to delivering more affordable homes to support the delivery of the 300,000 overall supply ambition and meet the needs of those let down by the broken housing market. To support this we have revised the National Planning Policy Framework, are increasing the supply of land and affordable homes in places of high housing demand through housing deals with local areas,¹⁰¹ and investing £9 billion through the Affordable Homes Programme (including £400 million of capital grant committed to building more supported and specialised housing).

Boosting social investment in social housing

174 We also recognise the role that social impact investors can play to increase supply of social housing, including for people going through tough times. Investments include:

- financing for housing associations which have a particular social focus, to supplement existing commercial investment streams;
- ethical property developments which deliver a higher proportion of affordable housing;
- increasing support for smaller housing providers;
- social lettings agencies and property funds that serve people facing mental health issues or substance abuse problems, domestic abuse victims and those with offending histories; and,

99 <https://www.gov.uk/government/news/homes-england-agrees-first-wave-of-strategic-partnerships-to-ramp-up-building-of-affordable-homes>

100 <https://www.gov.uk/government/topical-events/autumn-budget-2017>

101 <https://www.gov.uk/government/publications/oxfordshire-housing-deal>

- financing for specialist housing for adults with long term disabilities.

Improving the welfare system to help people struggling with the cost of housing

175 Residents spoke about their experience of welfare reform and concerns that Universal Credit was contributing to rent arrears. Landlords and the wider housing sector also expressed concerns – and Government has listened:

- To support low-income households in the private rented sector the Government created Targeted Affordability Funding. This is aimed at those areas where benefit rates have diverged the furthest from local rents. At Budget 2017, this funding was increased by £125 million, enabling the Government to increase 213 Local Housing Allowance rates, of which 203 were in England.
- At Budget 2017 we also announced that Universal Credit claimants will not be subject to any ‘waiting days’ and can now apply for an advance of 100 per cent of their indicative entitlement immediately, with the repayment period increasing from 6 months to 12 months. These changes will reduce rent arrears, provide a more stable rental income and restore confidence to landlords.

176 Universal Credit is designed to mirror the world of work, to give people control over their lives and encourage them to take responsibility for their financial affairs. This is important in minimising the difference between paid employment and receiving benefits. It also supports the rebalancing of power between residents and landlords in the social sector – giving residents clear ownership for their rental and service charge payments and empowering them as consumers.

5.4 Ensure we are using existing social housing efficiently for those who need it most

177 No matter how many affordable homes are built social housing will still be a precious resource so ensuring it is allocated fairly is crucial. Access to the

social rented sector is managed at a local level within a national framework. Local authorities set their own policies for allocations which will be published, but which must be in line with national legislation, regulations and statutory guidance.

178 The development of policy changes and local differences across England in terms of housing pressures has meant that the national picture of allocations is a complex one. We need to better understand how the system is playing out in local areas in order to understand if it is striking the right balance between fairness, support and aspiration.

179 We therefore propose an evidence collection exercise to help us understand how the allocations framework is working across the country. This evidence collection exercise will focus on:

- How local authority flexibilities on qualification and prioritisation are being used in practice – this will help us understand what is working and where the system and its implementation might be creating barriers or disincentives to people taking up opportunities or fulfilling their aspirations. It will also help to further understanding of how local authorities are making their decisions and supporting those most in need.
- How housing associations work with local authorities in allocating social housing – almost half of housing association general needs lettings are let to people on local authority waiting lists, as part of nomination agreements with the local authority.¹⁰²
- The role of local variations in lettings delivery including how they facilitate choice for residents – most social housing is let through some form of ‘choice-based lettings’ approach under which vacancies are openly advertised and people can apply for those that meet their needs. However, some local authorities have adopted other methods for matching residents to available properties.

Local authority tenancies

180 Our engagement with residents highlighted the importance they attach to housing stability in protecting vulnerable people and supporting strong communities, work and education.

102 MHCLG social housing lettings Continuous Recording (CORE) statistics

181 Currently, most people living in social housing have tenancies with lifetime security of tenure. These residents can stay in their social home indefinitely as long as they keep to the conditions of their tenancy agreement.

182 Since April 2012 all social landlords have had the flexibility to grant fixed term tenancies of two years or more, as well as existing lifetime tenancies.

183 Given the pressures on social housing the Government introduced further changes in the Housing and Planning Act 2016 to restrict the use of lifetime tenancies by local authority landlords. These changes are not yet in force but would require local authorities generally to grant tenancies on a fixed term basis and to review them towards the end of the fixed term period to decide whether to grant a further tenancy.

184 Since this legislation there has been a growing recognition of the importance of housing stability for those who rent. The challenges facing renters, including those in the private sector, were recognised in our White Paper, *'Fixing our broken housing market'*, and we are consulting on how to overcome the barriers to longer tenancies in the private rented sector.¹⁰³

185 Many residents spoke about the benefits of security in their tenancies, saying that they created strong, supportive communities, and particularly enabled people with vulnerabilities to thrive. Some felt that residents were more likely to look after their property, their neighbours, and the community if they had a lifetime tenancy. While some people thought it was right that residents should move out of social housing if they no longer needed it given the pressures on housing, many also had concerns about the uncertainty when fixed term tenancies came to an end and the impact this could have on their families and communities.

186 We have listened carefully to the views and concerns of residents and have decided not to implement the provisions in the Housing and Planning Act 2016 at this time.

187 We continue to recognise the benefits of fixed term tenancies in the right circumstances and social landlords can continue to consider how they can make use of them to get the best use out of their social

housing. But we think that how social landlords use fixed term tenancies should generally be decided at the local level, in consultation with residents, the wider community, and other social landlords in the area, in order to get the right balance between providing security for individuals and communities, and making best use of the homes available.

188 We have recently taken steps to ensure that when the mandatory fixed term tenancies provisions were implemented, lifetime tenants who suffer domestic abuse would retain lifetime security, when granted a new tenancy by a local authority. We want to make sure that similar protections for victims of domestic abuse are in place where local authorities offer fixed term tenancies at their discretion, and will therefore seek to bring forward legislation to achieve this when parliamentary time allows.

189 In the meantime we strongly encourage local authorities to give careful consideration to the safety and welfare of victims of domestic abuse, by ensuring that where they are offering further tenancies to lifetime social tenants as a result of domestic abuse, such tenancies are granted on a lifetime basis.

5.5 Ensuring social housing is a springboard to homeownership

Voluntary Right to Buy

190 There was significant interest from housing association tenants in an initial, small-scale pilot offering them the Right to Buy on similar terms to local authority tenants in 2016. Building on the success of the first pilot, we will launch a £200 million large-scale pilot of the Voluntary Right to Buy for housing association tenants this summer, which will give thousands of housing association residents in the Midlands the opportunity to purchase their own home.¹⁰⁴ We are using this pilot to test how the Voluntary Right to Buy works in practice within housing associations. It is important that we ensure the process works for tenants, and that housing associations are able to replace the homes sold under the pilot. We will test a new feature of the Voluntary

¹⁰³ <https://www.gov.uk/government/news/longer-tenancy-plans-to-give-renters-more-security>

¹⁰⁴ <https://www.gov.uk/government/topical-events/autumn-budget-2017>

Right to Buy – a “portable discount” which allows a tenant to move their discount to a different property where their home is not for sale.

Improving routes to affordable home ownership

191 We have taken action to increase the delivery of shared ownership homes. This includes a range of measures introduced in 2016 that made over 170,000 new households eligible, providing more people with a route into homeownership and greater social mobility.¹⁰⁵

192 However we know that some people can struggle to buy more equity in their homes. We have heard from both providers and shared owners and identified three main barriers:

- a) The minimum 10 per cent staircasing requirement – raising the money to buy a 10 per cent share can be difficult while trying to manage all other monthly outgoings. For some this may take many years, which can be a deterrent.
- b) The increasing value of the home – house price inflation creates uncertainty and this can make it difficult for shared owners to plan for the future. House prices rising faster than incomes in recent years has also made it more difficult.
- c) The additional fees – shared owners potentially need to pay mortgage and legal fees each time they purchase additional shares.

193 We are determined to remove the barriers that many shared owners face. We want everyone who enters shared ownership to have the opportunity to increase equity in their home. **How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?**

Case study – new approaches to Shared Ownership: SO Resi Plus



Thames Valley Housing (TVH) is a housing association based in South East England. In 2015 they introduced “SO Resi plus” – a shared ownership model that allows shared owners to staircase in increments of 1 per cent at a price set at the point of purchase. “SO Resi plus” has proved to be a very popular product for TVH. In 2016 they signed up the 100th person to the scheme, and there are currently just under 500 customers taking part. Last year they achieved a 94 per cent sign up rate. Overall an average of 18 per cent of applicants are choosing to buy the extra 1 per cent each year, compared to an average of 3-4 per cent who staircase in traditional shared ownership.

¹⁰⁵ <https://www.gov.uk/government/news/help-to-buy-new-announcements>

194 Rent to Buy was introduced to the Government's Affordable Homes Programme in 2016 to support those who aspire to home ownership but have struggled to save for a deposit. Tenants pay sub-market rent (at or below 80 per cent of the market rate) for a minimum of five years, to help them save for a deposit to buy their home.

195 For those who are still unable to purchase their home after the fixed term, we are encouraging more housing providers to offer the homes as shared ownership – providing Rent to Buy tenants with an opportunity to buy a stake in their home while still having the ability to buy more shares and achieve full ownership. We want to encourage innovative models that help tenants that are struggling to raise deposits.

Questions

45. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the Government's current arrangements strike the right balance between providing grant funding for housing associations and Housing Revenue Account borrowing for local authorities.

46. How we can boost community-led housing and overcome the barriers communities experience to developing new community owned homes?

47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

48. How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?

Consultation details

Consultation Summary

Topic of this consultation:	This consultation seeks responses to proposals relating to social housing.
Scope of this consultation:	The Ministry of Housing, Communities and Local Government is consulting on proposals relating to social housing.
Geographical scope of this consultation:	The proposals set out in this Green Paper relate to England only.
Impact Assessment:	<p>The purpose of the consultation is to gather evidence and seek views on proposals.</p> <p>Any policy changes brought forward as a result of the consultation would be subject to appropriate assessment.</p>

How to Respond

To:	This consultation is open to everyone. We are keen to hear from a wide range of interested parties from across the housing sector, including residents, landlords, local government, tenant engagement organisations and housing charities.
Body/ bodies responsible for the consultation:	Ministry of Housing, Communities and Local Government.
Duration:	The consultation will begin on 14 August 2018. The consultation will end on 6 November 2018. All responses should be received by no later than 23:45 on 6 November 2018.
Enquiries:	During the consultation, if you have any enquiries, please contact: SocialHousingGreenPaper@communities.gsi.gov.uk
How to respond:	<p>Consultation responses should be submitted by online survey: https://www.surveymonkey.co.uk/r/A_new_deal_for_social_housing</p> <p>We strongly encourage responses via the online survey, particularly from organisations with access to online facilities such as local authorities, representative bodies and businesses. Consultations on housing receive a high level of interest across many sectors. Using the online survey greatly assists our analysis of the responses, enabling more efficient and effective consideration of the issues raised for each question.</p> <p>We have listened to concerns about the use of online surveys and have made a number of adjustments ahead of this consultation. The online survey will allow respondents to: select the sections they wish to answer without having to go through the whole survey; save and return to the survey later; and, submit additional information or evidence to support their response to this consultation.</p>
	<p>Should you be unable to respond online we ask that you complete the pro forma available at https://www.gov.uk/government/consultations/a-new-deal-for-social-housing and send it to: SocialHousingGreenPaper@communities.gsi.gov.uk</p> <p>or:</p> <p>Social Housing Team Ministry of Housing, Communities and Local Government Third Floor Fry Building 2 Marsham Street London SW1P 4DF</p> <p>When you reply it would be very useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:</p> <ul style="list-style-type: none"> • your name, • your position (if applicable), • the name of organisation (if applicable), • an address (including postcode), • an email address, and • a contact telephone number.

Glossary

Affordable housing: housing for sale or rent, including social housing, for those whose needs are not met by the market.

Affordable Rent: social housing provided as part of an agreement with Homes England, the Greater London Authority or the Secretary of State where the rent is set up to 80% of market rent.

Arms Length Management Organisation: an organisation that provides and/or manages housing on behalf of a local authority on a not-for-profit basis.

Anti-social behaviour: conduct that has caused, or is likely to cause, harassment, alarm or distress to a person, or conduct capable of causing housing-related nuisance or annoyance to any person.

Borrowing Cap: the limit set by government that local authorities can borrow up to.

Community Land Trust: a non-profit organisation for the ownership and/or management of assets (e.g. housing) for the benefit of the local community. They are member organisations – with membership open to any person within the defined community – and may take various legal forms.

Consumer Price Index: a measure of inflation.

Council flat/house: a home rented from a local authority as distinct from a housing association.

English Housing Survey: a continuous national survey commissioned by the Ministry of Housing, Communities and Local Government (MHCLG). It collects information about people's housing circumstances and the condition and energy efficiency of housing in England.

Fixed Term Tenancy: a tenancy that lasts for a defined period of time at the end of which the landlord will decide whether to bring the tenancy to an end or grant a further one. In social housing the fixed term must be at least two years.

General Needs Housing: a way of describing social housing for rent that is not supported needs.

Green Paper: a consultation document produced by the government. The aim of this document is to allow people both inside and outside Parliament to give the department feedback on its policy or legislative proposals.

Homes England: the national housing delivery agency.

Housing association: non-profit organisation set up to provide affordable homes for those in need.

Housing Benefit: a benefit that is administered by local authorities, which is designed to assist people who rent their homes and have difficulty meeting their housing costs.

Housing Co-operative or Mutual: a form of home ownership whereby the residents each own part of a corporation that owns the building(s). The term "fully mutual" means that membership of the co-operative is mandatory for all tenants.

Housing Health and Safety Rating System: a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.

Housing Revenue Account: a local authority account in which all income and spending arising from its social housing stock is managed.

Household Reference Person: the 'householder' in whose name the accommodation is owned or rented. The concept is widely used in household surveys such as the English Housing Survey.

Key Performance Indicators: a measurable value that demonstrates how effectively main objectives are achieved.

Local Housing Allowance: a scheme applicable in the private rented sector, which limits the maximum amount of Housing Benefit or the Housing Cost Element of Universal Credit to an applicable rate, based on household size and Broad Rental Market Area.

Local Housing Company: independent commercial organisations wholly or partly owned by local authorities to buy, develop or manage properties.

Memorandum of Understanding: a framework that sets out how two parties will work together on a particular issue.

National Planning Policy Framework: a framework that sets out the Government's planning policies for England and how these are expected to be applied.

Non-Departmental Public Body: a body which has a role in the processes of national government, but is not a government department or part of one, and which accordingly operates to a greater or lesser extent at arm's length from ministers.

Private Registered Provider: a registered provider of social housing that is not a local authority. Most are housing associations.

Private Rented Sector: homes rented from private landlords.

Rent To Buy: an affordable home ownership scheme that allows tenants to pay sub-market rent for a limited period, to help them save for a deposit to buy their home.

Registered provider of social housing: a social housing landlord that is registered with the Regulator of Social Housing. This includes local authority landlords and private registered providers (such as housing associations and housing co-ops).

Right to Buy: this scheme allows tenants of local authorities and some housing associations, with a secure tenancy, to purchase their home, with a discount.

Right to Buy Receipts: money arising from the sale of local authority homes sold either under the Right to Buy legislation or sold voluntarily to secure tenants at less than market value.

Shared ownership: an affordable home ownership scheme that allows residents to purchase 25-75% of a home and then pay a subsidised rent on the remaining share. Residents are able to buy further shares in their homes in minimum 10% instalments, and in most circumstances, up to full ownership.

Social Housing: housing to rent below the market rent or to buy through shared ownership or equity percentage arrangements, that is made available to people whose needs are not adequately served by the housing market.

Social Rent: low cost rent set in accordance with a government formula.

Social Rented Sector: homes for rent that are owned and managed by local authorities and private registered providers.

Tenant Management Organisation: local authority tenant led (by unpaid volunteers) groups who take responsibility for managing the homes they live in.

The Regulator of Social Housing (The Regulator): an independent regulator which regulates providers of social housing (including local authority and private registered providers). Its principal role is to promote a viable, efficient and well-governed social housing sector able to deliver homes that meet a range of needs.

Universal Credit: a single, means-tested working-age benefit; paid to people whether in work or not.

Vacant Higher Value Council Homes (Higher Value Assets): A policy in the Housing and Planning Act 2016 that would enable the Government to ask local authorities to make a payment based on the market value of their vacant higher value council homes, with the expectation that they would sell these homes and the money raised would be used to fund a replacement home and extend the Right to Buy to Housing Association tenants.

Voluntary Right To Buy: In its 2015 manifesto, the Government committed to extend the Right to Buy to housing association tenants. In October 2015, the National Housing Federation, on behalf of the housing association sector, made an agreement with Government to extend Right to Buy level discounts to eligible tenants through a voluntary rather than statutory approach. An initial pilot ran during 2016/17 with five housing associations, and a larger scale Midlands pilot of the scheme will launch in summer 2018.

White Paper: policy document produced by the government that set out their proposals for future legislation and may include a draft version of a Bill that is being planned.

Annex A – The Regulatory Framework for social housing

The Housing and Regeneration Act 2008 sets out specific duties and responsibilities for an independent Regulator of Social Housing (“the Regulator”).

Who is regulated?

The regulatory framework applies to all “registered providers” of social housing. Local authorities who own homes are automatically registered and there is a registration process for private sector providers (such as housing associations, registered charities and “for profit” landlords) and bodies such as Arms Length Management Organisations.

What is the purpose of Regulation?

What are expectations of landlords?

The principal regulatory tool is a set of **seven outcome-based standards** to deliver these objectives. This comprises:

Parliament has set the Regulator two fundamental objectives:

- a) an **economic regulation objective**, which seeks to ensure a viable sector that is well-governed and efficient to command lender confidence and support delivery of new housing through a combination of private finance and public funding, and
- b) a **consumer regulation objective**, which seeks to support the provision of social housing that is well-managed and of appropriate quality, and to protect and empower residents.

No.	Name of Standard	Published	Type	Requirement
1	Governance and Financial Viability	April 2015	Economic	Effective organisational governance and resource management
2	Value for Money	April 2018	Economic	Ensure assets and resources deliver the best value possible
3	Rent	April 2015	Economic	Setting and charging rent in line with Government rules
4	Tenant Involvement and Empowerment	July 2017	Consumer	Landlords should provide choice and effective communication to tenants, including complaint handling
5	Home	April 2012	Consumer	Ensure homes are kept safe, decent and in a good state of repair
6	Tenancy	April 2012	Consumer	Letting homes in a fair, transparent and efficient way
7	Neighbourhood and Community	April 2012	Consumer	Keeping the wider area clean and safe, promoting wellbeing and tackling anti-social behaviour

How are the standards monitored and enforced?

Legislation requires the Regulator to carry out its responsibilities in a way that minimises interference and (so far as is possible) is proportionate, consistent, transparent and accountable.

Consistent with this approach, the operation of the regulatory framework is based on the principle of ‘co-regulation’. This means that the Regulator regards

Boards of organisations and local councillors as being responsible to their tenants for ensuring that the business and its services are managed effectively and that providers comply with the requirements of all regulatory standards.

The Regulator is asked to adopt a proactive, risk-based approach to enforcing the economic standards, which apply only to private registered providers. In contrast, the Regulator’s role in enforcing the four consumer

standards – which apply to all registered providers – is limited. It may only intervene for a breach of a consumer standard if it thinks there are reasonable grounds to suspect that a landlord's failure to meet a consumer standard has caused, or may cause serious detriment to tenants or potential tenants. The Regulator may also intervene where it considers there is a significant risk that if no action is taken, the failure to meet a standard will result in serious detriment to tenants or potential tenants. The Regulator interprets 'serious detriment' as actual or potential harm to tenants and where there has been systemic failure.

Where there is a breach of standards, the Regulator will initially work with the landlord to improve its performance. However, if this approach does not yield results or the landlord refuses to cooperate then the Regulator has a range of other powers it can use.



Ministry of Housing,
Communities &
Local Government

A new deal for social housing

A Consultation



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A new deal for social housing

Introduction

This consultation seeks views on making sure that social housing provides safe and secure homes that help people get on with their lives. The consultation is open to everyone. We are interested to hear from a wide range of interested people including residents, landlords and lenders.

The consultation is divided into 5 parts:

Part 1: Ensuring homes are safe and decent

Part 2: Effective resolution of complaints

Part 3: Empowering residents and strengthening the Regulator

Part 4: Tackling stigma and celebrating thriving communities

Part 5: Expanding supply and supporting home ownership

Respondents are invited to respond to each specific part and the relevant responses to each part will be considered in taking forward that particular proposal.

This consultation begins on 14 August 2018 and runs for 12 weeks until 11.45pm on 6 November 2018.

The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included at Annex A at the end of this survey. Individual responses will not be acknowledged.

About you

1. Are you responding:

- ☐ On behalf of an organisation
- ☐ As a private individual

If you are responding as an individual, please tell us the following details below. It is not mandatory to answer, but it would help us understand if we need to reach out to all groups to respond to this consultation.

2. Do you live in social housing? This includes tenants, leaseholders and shared owners.

- ☐ Yes
- ☐ No

3. What age category do you belong to?

- | | |
|--------------------------------|--------------------------------------|
| <input type="checkbox"/> 16-24 | <input type="checkbox"/> 45-54 |
| <input type="checkbox"/> 25-34 | <input type="checkbox"/> 55-64 |
| <input type="checkbox"/> 35-44 | <input type="checkbox"/> 65 and over |

4. Where do you live?

- | | |
|--|---|
| <input type="checkbox"/> North East | <input type="checkbox"/> London |
| <input type="checkbox"/> North West | <input type="checkbox"/> South West |
| <input type="checkbox"/> Midlands | <input type="checkbox"/> South East |
| <input type="checkbox"/> East of England | <input type="checkbox"/> Other (please specify) |

5. We may want to contact you about your response. If you are willing for us to do this please provide an email address.

About you - organisation

6. If you are responding on behalf of an organisation, please tell us which sector your organisation is in:

- | | |
|--|---|
| <input type="checkbox"/> Local Authority | <input type="checkbox"/> Tenant Management Organisation |
| <input type="checkbox"/> Housing Association | <input type="checkbox"/> Trade Association |
| <input type="checkbox"/> Cooperative | <input type="checkbox"/> Tenant Representation Group |
| <input type="checkbox"/> Other | |

7. If you chose 'other' please tell us the sector which your organisation is in:

8. If you are responding on behalf of an organisation, please tell us the name of your organisation:

In addition to completing these consultation questions have any documents to support your response please attach them to this survey

9. We may want to contact you about your response. If you are willing for us to do this please provide an email address.

A new deal for social housing

Chapter one - Ensuring homes are safe and decent

Dame Judith Hackitt's independent review of building regulation and fire safety states that residents have an important role to play in identifying and reporting issues that may impact on the safety of the building and in meeting their obligations, including co-operating with crucial safety-related works, to ensure their own safety and that of their neighbours.

10. How can residents best be supported in this important role of working with landlords to ensure homes are safe?



There have been recent changes to drive up safety that apply to the private rented sector but not the social sector. For example, in 2015, we introduced a requirement to install smoke alarms on every storey in a private rented sector home, and carbon monoxide alarms in every room containing solid fuel burning appliances. Government has recently announced that there will be a mandatory requirement on landlords in the private rented sector to ensure electrical installations in their property are inspected every five years.

11. Should new safety measures in the private rented sector also apply to social housing?

- ☐ Yes
- ☐ No
- ☐ Not sure

Please explain your answer further below, if you wish to.

The Decent Homes Standard requires social homes to be free of hazards that pose a risk to residents, to be in a reasonable state of repair, to have reasonably modern facilities and services such as kitchens and bathrooms and efficient heating and effective insulation.

12. Are there any changes to what constitutes a decent home that we should consider?

- ☐ Yes
- ☐ No
- ☐ Not sure

Please explain your answer further below, if you wish to.

13. Do we need additional measures to make sure social homes are safe and decent?

- ☐ Yes
- ☐ No
- ☐ Not sure

If you answered yes, are there measures you would suggest? Please answer below.



A new deal for social housing

Chapter two - Effective resolution of complaints

We want to understand whether more residents need to be able to access independent advice and potentially advocacy to support them in making a complaint.

Alternative dispute resolution and mediation services can be critical in allowing issues to be resolved swiftly and locally, while sustaining positive relationships between the parties involved. We are considering whether and how we might strengthen the mediation available for residents and landlords after initial attempts at resolution have failed.

14. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

- ☐ Yes
- ☐ No
- ☐ Not sure

If you answered yes, you can provide suggestions below.

Where a complaint is not resolved, a resident should refer their complaint to a “designated person”, such as a local MP, councillor or tenant panel, (known as the democratic filter), but if they do not want to do this or the designated person does not resolve or refer it on themselves, a resident must wait for eight weeks before the complaint can be referred to the Housing Ombudsman. There is a perception that the process of seeking redress took too long, and that the “democratic filter” contributed to delays.

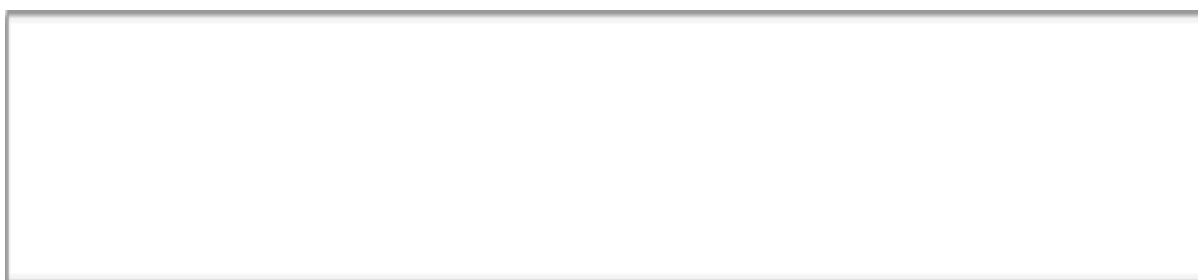
15. Should we reduce the eight week waiting time to four weeks? Or should we remove the requirement for the 'democratic filter' stage altogether?

- ☐ Support the option to reduce the waiting time to four weeks
- ☐ Support the option to remove the 'democratic filter' stage altogether

- ☐ Support no change
- ☐ Not sure

Reforming the filter stage would require primary legislation. We therefore also want to explore what more could be done in the meantime to help ensure that “designated persons” better understand their role and help to deliver swift, local resolutions for residents.

16. What can we do to ensure that “designated persons” are better able to promote local resolutions?



We are looking at awareness of housing dispute resolution services more widely as part of our housing redress consultation. We also want to consider if there is a case for an awareness campaign to support social residents in particular to understand their rights to seek redress and to know how to make complaints and escalate them where necessary.

17. How can we ensure that residents understand how best to escalate a complaint and seek redress?



We want to understand whether more residents need to be able to access independent advice and potentially advocacy to support them in making a complaint.

18. How can we ensure that residents can access the right advice and support when making a complaint?

There are no statutory guidelines setting out time frames within which providers should handle complaints. Dissatisfaction with the length of time it takes to resolve issues was mentioned at our engagement events. We therefore want to consider how to speed up landlord complaints processes.

19. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?

20. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?

A new deal for social housing

Chapter three - Empowering residents and strengthening the Regulator

We consider that key performance indicators should be focused on issues of key importance to residents, covering those identified through our engagement, such as:

- Keeping properties in good repair;
- Maintaining the safety of buildings;
- Effective handling of complaints;
- Respectful and helpful engagement with residents; and,
- Responsible neighbourhood management, including tackling anti-social behaviour.

21. Do the proposed key performance indicators cover the right areas?

- ☐ Yes
- ☐ No
- ☐ Not sure

22. Are there any other areas that should be covered?

- ☐ Yes
- ☐ No
- ☐ Not sure

Please explain your answer further below, if you wish to.

23. Should landlords report performance against these key performance indicators every year?

- ☐ Yes
- ☐ No
- ☐ Not sure

24. Should landlords report performance against these key performance indicators to the Regulator?

- ☐ Yes
- ☐ No
- ☐ Not sure

25. What more can be done to encourage landlords to be more transparent with their residents?

The Regulator already expects landlords to publish information about complaints each year, but approaches vary. We are considering setting out a consistent approach on how landlords should report their complaint handling outcomes, by asking them to report how many complaints were resolved, how many were resolved after repeated complaints and how many were referred to the Ombudsman.

26. Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?

- ☐ Yes
- ☐ No
- ☐ Not sure

If yes, how can this be made as clear and accessible as possible for residents?.

27. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?

- ☐ Yes
- ☐ No
- ☐ Unsure

Please explain your answer further below, if you wish to.

28. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?

We want to consider the role of financial incentives and penalties to promote the best practice and deter the worst performance. For example, whether key performance indicators should help inform or influence the extent to which landlords receive

funding and link the Affordable Homes Programme funding to the Regulator's governance rating as well as the viability rating.

29. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord?

- ☐ Yes
- ☐ No
- ☐ Not sure

Please explain your answer further below, if you wish to.

30. What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?

We want to understand more about whether the regulatory framework is setting the right expectations on how landlords should engage with residents, and how effective current resident scrutiny measures are. Landlords are required to consult residents at least once every three years on the best way of involving them in the governance and scrutiny of the housing management service, and demonstrate how they respond to tenants' needs in the way they provide services and how they communicate.

31. Are current resident engagement and scrutiny measures effective?

- ☐ Yes
- ☐ No
- ☐ Not sure

32 What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?

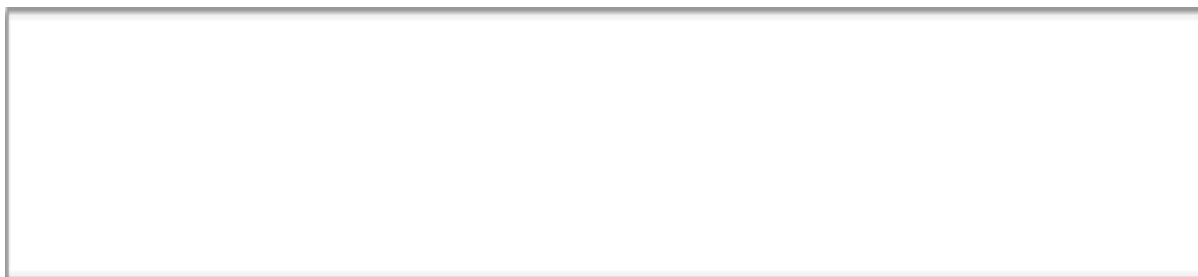


A number of national tenant and resident organisations in the sector have been exploring the option of an independent platform for tenants, based on widespread engagement with tenants, to enable them to have their voices heard more effectively at a national level.

33. Is there a need for a stronger representation for residents at a national level?

- ☐ Yes
- ☐ No
- ☐ Not sure

If you answered yes, how should this best be achieved?



We want to offer residents greater opportunity to exercise more choice and influence over the day to day housing services. We are exploring options to demonstrate how

community leadership can be embedded in the governance and culture of mainstream landlords.

34. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations?

- ☐ Yes
- ☐ No
- ☐ Don't know

If you answered yes, what would it need to make it work?

35. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?

- ☐ Yes
- ☐ No
- ☐ Not sure

36. Are Tenant Management Organisations delivering positive outcomes for residents and landlords?

- ☐ Yes
- ☐ No
- ☐ Don't know

Please explain your answer further below if you wish to.

37. Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?

- ☐ Yes – the current processes are suitable and achieve the right balance.
- ☐ Yes – the current processes are suitable but do not achieve the right balance
- ☐ No – the current processes are not suitable and do not achieve the right balance
- ☐ Not sure

Please explain your answer further below, if you wish to.

There have been schemes, such as Local Management Agreements and Community Cashback (called Give it a Go grants) which have been designed to support social residents to take responsibility for a service within their local community.

38. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?

39. Do you think there are benefits to models that support residents to take on some of their own services?

- ☐ Yes
- ☐ No
- ☐ Not sure

If yes, what is needed to make these work?

40. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

The Government has recently announced a significant programme of leasehold reform which will benefit all leaseholders, both in the private and social sectors.

41. What more could we do to help leaseholders of a social housing landlord?

A new deal for social housing

Chapter three continued - Empowering residents, making sure their voices are heard

Parliament has set the Regulator of Social Housing a consumer objective, which is:

- to support the provision of social housing that is well-managed and of appropriate quality;
- to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection;
- to ensure that tenants of social housing have the opportunity to be involved in its management and to hold their landlords to account; and,
- to encourage registered providers of social housing to contribute to the environmental, social and economic well-being of the areas in which the housing is situated.

42. Does the Regulator have the right objective on consumer regulation?

- ☐ Yes
- ☐ No
- ☐ Not sure

Please explain your answer further below, if you wish to.

The Regulator has published four outcome-based consumer standards to deliver the consumer regulation objective. These are:

1. The Tenant Involvement and Empowerment Standard (July 2017) which includes a requirement for landlords to provide choices and effective communication of information for residents on the delivery of all standards, and to have a clear, simple and accessible complaints procedure.
2. The Home Standard (April 2012) which requires homes to be safe, decent and kept in a good state of repair.

3. The Tenancy Standard (April 2012) which requires registered providers to let their home in a fair, transparent and efficient way, and enable tenants to gain access to opportunities to exchange their tenancy.
4. The Neighbourhood and Community Standard (April 2012) which requires registered providers to keep the neighbourhood and communal areas associated with the homes that they own clean and safe; help promote social, environmental and economic well-being in areas where they own homes; and work in partnership with others to tackle anti-social behaviour in neighbourhoods where they own homes.

43. Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed?

- ☐ Yes
- ☐ No
- ☐ Not sure

If yes, how?

We also want to know whether landlords and residents would benefit from further guidance on what good looks like, without being overly prescriptive.

44. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?

- ☐ Yes
- ☐ No
- ☐ Not sure

Where a landlord breaches a consumer standard, the Regulator can only use its regulatory and enforcement powers if there is or may be a “serious detriment” to existing or potential residents. The Regulator interprets this as meaning where there is “serious actual harm or serious potential harm to tenants.”

45. Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards?

- ☐ Yes
- ☐ No
- ☐ Not sure

If no, what would be an appropriate threshold for intervention?

To support a more proactive approach to enforcing the consumer standards we are considering arming residents with information through the introduction of a number of key performance indicators and for landlord performance to be published. Our current thinking is that the Regulator should monitor the key performance indicators to identify where there may be issues of concern with performance. The Regulator would then be able to make a risk-based assessment of how and where to intervene, including through more regular or phased interventions.

46. Should the Regulator adopt a more proactive approach to regulation of consumer standards?

- ☐ Yes
- ☐ No
- ☐ Not sure

47. Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards?

- ☐ Yes
- ☐ No
- ☐ Not sure

If yes, how should this be targeted?

We want to make sure that regardless of whether someone is a resident of a housing association or a local authority, the same minimum standards of service apply. The Government respects the democratic mandate of local authorities, but this must be balanced against the need to ensure that residents are protected.

48. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords?

- ☐ Yes
- ☐ No
- ☐ Not sure

If yes, what measures would be appropriate?

Where a breach of the consumer standards meets the “serious detriment” test, the Regulator will publish a regulatory notice and consider the most appropriate course of action.

The Regulator is able to use a number of regulatory and enforcement powers where necessary to ensure compliance with the standards. The Regulator has different tools available depending on the landlord, and has published guidance setting out how it will use its powers. The key powers include:

Powers applicable to all landlords :

- Survey to assess the condition of stock
- Inspection to establish compliance with the regulatory requirements
- Hold an Inquiry where it suspects landlord mismanagement
- Issue an Enforcement Notice
- Requirement to tender some or all of its management functions
- Requirement to transfer management of housing to a specified provider

Powers applicable only to private registered providers:

- Issue Fines
- Order payment of compensation to a resident
- Appointment of manager to improve performance of the landlord
- Transfer land to another provider to improve management of land (following an Inquiry)
- Suspension and removal of officers in cases of mismanagement (during or after Inquiry)
- Appoint a new officer to address service failure and improve management of company

Power applicable only to local authority landlords:

- Appoint an adviser to improve performance

49. Are the existing enforcement measures described above adequate?

- ☐ Yes
- ☐ No
- ☐ Not sure

If you answered no, what other enforcement powers should be considered?

As part of examining the scope of the Regulator's role we want to consider the case for extending its remit to other organisations that manage social housing. The Regulator will hold the local authority landlord to account for the way services are delivered so it is vital that the local authority has good oversight arrangements in place to ensure that management organisations provide a good service.

50. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust?

- ☐ Yes
- ☐ No
- ☐ Not sure

If you answered no, what more is needed to provide effective oversight of these organisations?

We want to be clear and transparent about how the Regulator is accountable to Parliament for meeting its statutory objectives. Upcoming legislative changes will shortly establish it as a standalone Non-Departmental Public Body. As such it will be accountable to Parliament in the same way as other Non-Departmental Bodies.

51. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?

A New Deal for Social Housing

Chapter Four - Tackling stigma and celebrating thriving communities

We want to celebrate residents' role in shaping fantastic places by recognising the best neighbourhoods.

52. How could we support or deliver a best neighbourhood competition?



53. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?



We want to embed a customer service culture and attract, retain and develop the right people with the right behaviours for the challenging and rewarding range of roles offered by the sector.

54. What is needed to further encourage the professionalisation of housing management to ensure all staff delivers a good quality of service?



We are minded to introduce a key performance indicator that will capture how well landlords undertake their neighbourhood management responsibilities.

55. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

56. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities?

57. Should landlords report on the social value they deliver?

Yes

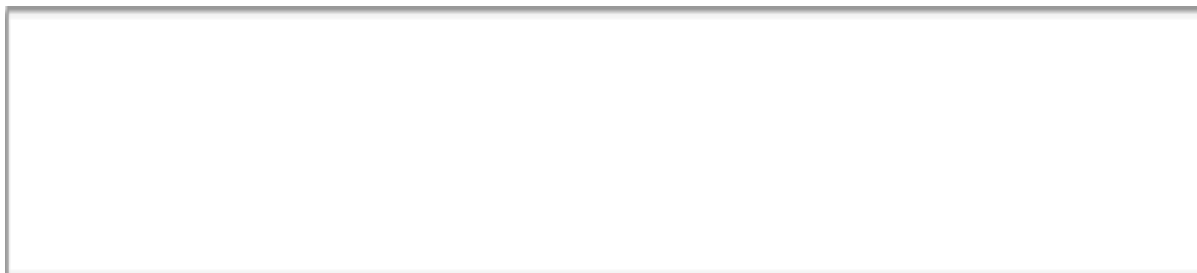
No

Not sure

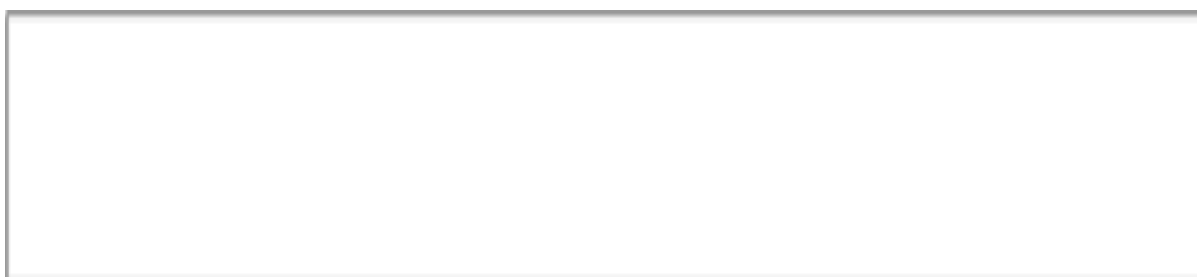
Please explain your answer further below, if you wish to.

We are proposing to introduce a key performance indicator to help tackle anti-social behaviour, but we will want to consider how this could impact on areas, and whether it could lead to some people feeling more stigmatised.

58. How are landlords working with local partners to tackle anti-social behaviour?



59. What key performance indicator could be used to measure this work?



We want to ensure that the revised National Planning Policy Framework is applied to social housing in the right way. In particular we will:

- Strengthen planning guidance to take into account the principles of Secured by Design: to ensure that external spaces, parks, streets and courts are well-lit and well maintained so they are safe from crime and the fear of crime.
- Strengthen guidance to encourage healthy and active communities: building on the NPPF's healthy and safe communities chapter.
- Strengthen guidance to encourage new affordable homes to be designed to the same high-quality as other tenures and well-integrated within developments.
- Encourage design that reflects changing needs: for example, inclusive design for an ageing population and family housing at higher densities for effective use of land.

60. What other ways can planning guidance support good design in the social sector?

Neighbourhood planning gives communities power to agree and implement a shared vision for their neighbourhood. However, we are aware that too often local people hear about schemes after a planning application has been submitted.

61. How can we encourage social housing residents to be involved in the planning and design of new developments?

A new deal for social housing

Chapter Five: Expanding supply and supporting home ownership

62. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the government's current arrangements strike the right balance between providing grant funding for Housing Associations and Housing Revenue Account borrowing for Local Authorities

- ☐ Yes, current arrangements strike the right balance
- ☐ No, they don't strike the right balance
- ☐ Not sure

Please explain your answer further below if you wish to.

63. How we can boost community led housing and overcome the barriers communities experience to developing new community owned homes?

We want to give housing associations and others the certainty they require to develop ambitious plans to deliver the affordable homes this country desperately needs

64. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

We are determined to remove the barriers that many shared owners face. We want everyone who enters shared ownership to have the opportunity to increase equity in their home.

65. How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?

THANK YOU FOR TAKING THE TIME TO SHARE YOUR THOUGHTS

About this consultation

This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, , may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the EU General Data Protection Regulation, and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included at Annex A.

Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us via the complaints procedure at <https://www.gov.uk/government/organisations/departments-for-communities-and-local-government/about/complaints-procedure>.

Annex A

Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018.

Note that this section only refers to your personal data (your name, address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gsi.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

3. With whom we will be sharing your personal data

Your data will not be shared with anyone outside MHCLG.

4. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for two years from the closure of the consultation

5. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to ask to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

6. Your personal data will not be used for any automated decision making.

7. The data you provide will be directly stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in terms of data protection will not be compromised by this. Your data will also be stored in a secure government IT system.

THE NATIONAL PLANNING POLICY FRAMEWORK AND THE GREATER NORWICH LOCAL PLAN

Portfolio Holder: Planning

Wards Affected: All

1 SUMMARY

- 1.1 The National Planning Policy Framework has been revised this year to react to recent changes to the requirements of housing, infrastructure and the environment. The revision will have an impact on the GNLP work, which should be positive due to the increased flexibility of policies and the promotion of joint working.
- 1.2 The Housing Delivery Test has been introduced as a new measure to calculate net additional dwellings against the number of homes required. Local authorities that do not meet HDT requirements will have to produce an Action Plan detailing the reasons and methods of improving. The NPPF's revision will be used to guide the growth strategy and GNLP policy framework.

2 KEY DECISION

- 2.1 This is not a key decision and has not been published in the Forward Plan.

3 BACKGROUND

- 3.1 This report summarises the attached report produced by the Greater Norwich Local Plan Team (Appendix 1). The National Planning Policy Framework (NPPF) was revised in July 2018 and replaces the 2012 version. The Greater Norwich Local Plan (GNLP) work reflects the recent changes, such as using the standard methodology when establishing housing numbers.
- 3.2 The implications of the new NPPF will be integrated into the GNLP, making it one of the first Local Plans to do so. Therefore, this paper sets out the changes to the NPPF and how it affects the Joint Core Strategy (JCS) in relation to the Housing Delivery Test (HDT).

4 THE ISSUES

- 4.1 National and local policy aims to support wider policy in the Industrial Strategy so that productivity and infrastructure can be improved. The main changes to the NPPF promote strategic planning and housing in particular. It also encourages support of infrastructure enhancement and environmental

protection. There is also validation for the collaborative approach taken in Greater Norwich and the Government indicates that authorities with cross boundary plans are more likely to access funding. There is also emphasis on the fact that both supply and progression of sites should rise to improve delivery. Consequently, more small housing sites should complement strategic sites as well as being close to strategic employment locations.

4.2 The following points set out the key themes that have been changed in the NPPF and their implications can be seen in the Table 1 in the report. The themes include:

- Design quality and effective use of land
- Environmental protection
- Diversification and mix of sites to improve delivery
- Developer contributions
- Green Belt

4.3 The revised NPPF has been designed to be more flexible with policies that include a 'not one size fits all' approach, key strategic priorities, joint working promoted and rolling five year plan reviews, to name a few. It also attempts to address the needs such as a greater emphasis on sustainable development, a standard method for assessing housing need and a requirement for Neighbourhood Plans to set housing numbers. Implications of these changes are incorporated into the table.

4.4 The HDT is a new test that measures net additional dwellings against the homes required. The methodology for calculating the HDT is set out in a rule book by the Ministry for Housing, Communities and Local Government (MHCLG), which will also publish results annually in November. Local authorities that do not meet HDT requirements will have to produce an Action Plan, detailing reasons for under-delivery and ways of increasing delivery rates. In cases where local authorities work in partnership (such as Greater Norwich), housing delivery can be measured over the whole area rather than by district. This is because Norwich cannot meet its housing needs in its boundary, so they are met beyond it. Early indications suggest that the HDT will only affect Norwich locally, though consideration will be given to ways of addressing the issue.

5 PROPOSED ACTION

5.1 It is proposed that the Place Shaping Panel note the key changes to the National Planning Policy Framework and the potential implications for the Greater Norwich Local Plan.

- 5.2 The NPPF's requirements will guide the overall growth strategy and the GNLP policy framework.

6 RESOURCE IMPLICATIONS

- 6.1 The proposed 'next steps', in relation to these issues (as detailed in the attached report) will have implications on staff resources. This will be met from within the existing GNLP officer time.

7 LEGAL IMPLICATIONS

- 7.1 The NPPF constitutes the Government's national planning policy framework and Local Plans must be in conformity with policies therein.

8 CONCLUSION

- 8.1 The Place Shaping Panel is asked to note the enclosed report and raise any issues for consideration by officers and the Portfolio Holder.

Phil Courtier
Head of Planning

Background Papers

None.

For further information on this report call John Walchester, Spatial Planning Manager on (01603) 430622 or e-mail john.walchester@broadland.gov.uk

The National Planning Policy Framework and the Greater Norwich Local Plan

Recommendation

The Board recommends that the constituent authorities note the content of this report which summarises recent changes to the National Planning Policy Framework and how they will affect plan-making and implementation locally.

Background

1. The revised National Planning Policy Framework (NPPF) was published in July 2018. It fully replaces the 2012 NPPF, providing the framework within which locally-prepared plans for housing and other development can be produced.
2. Work on the Greater Norwich Local Plan (GNLP) to date has reflected emerging national policy changes set out in the draft NPPF, for example by using the draft standard methodology to establish housing numbers for the GNLP consultation in early 2018.
3. Papers presented to the Greater Norwich Development Partnership (GNDP) in June 2018 stated that the implications of the new NPPF will be fully consulted on and integrated into the GNLP, enabling it to be one of the first local plans to do so. Consequently, this paper sets out key changes to the NPPF and their implications for plan-making locally. It also identifies how the NPPF is likely to affect implementation of the Joint Core Strategy (JCS) in relation to the new Housing Delivery Test (HDT) set out in the NPPF.

Government's aims

4. The NPPF, and in turn local plans, are intended to support wider policy aims in the UK's Industrial Strategy. This aims to drive up productivity and update infrastructure through a delivery programme which focuses on "grand challenges" facing the country stemming from technological change, mobility, clean growth and an ageing society.
5. Overall, the main changes made by the Government to the NPPF aim to promote strategic planning, with joint working across boundaries and to support the delivery of development in general, and housing in particular. The NPPF also supports the Government's aim to ensure that infrastructure is provided to support growth and strong environmental protection and enhancement measures are in place.
6. As reported to the GNDP in June 2018 in relation to the draft NPPF, in emphasising the value of cross boundary strategic plans nationally, the NPPF provides strong validation for the collaborative approach we have taken in Greater Norwich for over

a decade. Government statements have also indicated that those authorities which produce cross boundary plans are more likely to be able to access funding.

7. For delivery to be improved, Government has emphasised that both the supply of housing sites through the planning system will need to continue to rise and developers will need to progress sites more rapidly. Their view is that housing delivery will be speeded up by ensuring that a greater diversity of housing product is available and better use is made of land. Local plans can help to achieve this by providing a greater variety of sites and increasing densities.
8. As a result, the GNLP will need to allocate more small housing sites to complement the strategic sites already allocated through the Joint Core Strategy (JCS) and look to increase densities where possible. At the same time, the strategy will need to support economic growth and sustainability by focusing housing close to the key strategic employment locations which are currently growing and will continue to do so.

Key changes to the NPPF

9. Table 1 below sets out key NPPF changes and their implications for the emerging GNLP:

NPPF changes		Implications for GNLP
Key themes		
Design quality + effective use of land	<ul style="list-style-type: none"> Locally led design standards. Optimise land use (density standards, “building up”). Reflect local character and opportunities. Role of transport, health, integration and security in design. 	<ul style="list-style-type: none"> Continue use of BfL12 design standard - resources needed. Consider need to establish minimum densities for centres, locations well served by public transport + other parts of the plan area in addition to Norwich. Retain focus on local character. Promote socially inclusive and secure development with good access to services and sustainable transport which supports healthy lifestyles.
Environmental protection	<ul style="list-style-type: none"> Biodiversity net gain principle. Greater protection for ancient woodlands. Cover risks from overheating. Sustainable and safe access to sites 	<ul style="list-style-type: none"> Include biodiversity net gain principle. Retain policy protection of ancient woodland. Retain policy coverage of risks from overheating. Sites will need “appropriate opportunities to promote sustainable transport modes, safe and suitable access to the site for all”.

NPPF changes		Implications for GNLP
Key themes		
Diversification and mix of sites to improve delivery	<ul style="list-style-type: none"> • Small sites requirement. • Sub-divide large sites. • Housing for different groups – affordable housing, housing for the elderly, family housing, student accommodation, people with disabilities and travellers. • Amendments to affordable housing definitions • Reallocation + alternative uses. • Five year land supply. • Support for new settlements. • Support for village growth where it will support local services. 	<ul style="list-style-type: none"> • Greater mix of site size, less reliance on strategic sites which should only be included where delivery can be demonstrated. • Considerable need for sites of 0.5 to 1 hectare to meet 10% small sites requirement. Likely to form significant element of new allocations. • Sub-divide large sites where necessary. • Ensure evidence is available and policies address all types of housing need. • Allocations to contain requirements to assist delivery of a greater diversity of homes for different markets. • Promote self-build. • Have clear evidence on existing allocations and de-allocate if good evidence of delivery is not provided. • Ensure plan allocations include deliverable sites to help to address five year land supply issues. • Consider rebalancing growth between Broadland and South Norfolk to assist delivery. • Consider whether plan should allocate new settlement/flag up long term potential for new settlement. • Focus rural growth on villages with services or shared services in clusters.
Developer Contributions	<ul style="list-style-type: none"> • Plan led viability assessments – new guidance. • Clear expectations for infrastructure contributions. • CIL review. 	<ul style="list-style-type: none"> • Complete ongoing viability study. • Require developers to make binding commitment to meeting plan requirements to enable allocation of sites. • Undertake CIL review when Government guidance is available.
Green Belt	<ul style="list-style-type: none"> • New Green Belts should only be established in exceptional circumstances 	<ul style="list-style-type: none"> • Decide on need for a new Green Belt locally – can only be established through local plans.
More flexible and proportionate plan making		
<ul style="list-style-type: none"> • Not one size fits all. • Key strategic priorities. • Joint working promoted. • Proportionate evidence (including local industrial strategy) + soundness tests. • Rolling five year reviews of plans. • Requirement for Statement of Common Ground to ensure cross boundary agreements on strategic issues. 		<ul style="list-style-type: none"> • The authorities will need to continue to plan cross boundary and the GNLP will need to clearly distinguish between strategic and any non-strategic policies. • Set out strategy for the pattern, scale and quality of development to cover: <ul style="list-style-type: none"> ○ Housing, employment, retail + leisure uses (including town centre diversification), other commercial development, environmental protection and enhancement (natural,

NPPF changes	Implications for GNLP
Key themes	
	<p>built + historic environments, landscapes, green infrastructure, climate change);</p> <ul style="list-style-type: none"> ○ Infrastructure (including transport, telecoms, security, water, flood risk and energy); ○ Community facilities (including health, education and culture). <ul style="list-style-type: none"> • Ensure there is evidence to support “an appropriate strategy”. • Ensure rolling review of joint strategic plan (especially if housing numbers change). • Norfolk Strategic Planning Framework (NSPF) to be adapted to Statement of Common Ground to meet stronger cross boundary expectations.
Addressing needs	
<ul style="list-style-type: none"> • Presumption in favour of sustainable development clearer and stronger. • Standard method for assessing housing need (new guidance, but review needed). • Requirement to set housing numbers for neighbourhood plans. 	<ul style="list-style-type: none"> • Presumption will continue to apply where there is no five year land supply. • Continued uncertainty over housing numbers for plan while national methodology review takes place. Review currently not anticipated to affect GNLP timetable if completed by January 2019 as stated by Government. • Need to provide strategic numbers for emerging neighbourhood plans e.g. Diss and neighbourhood. NPs can raise, but not lower, these figures.

Implementation of the Joint Core Strategy

10. The NPPF has also introduced a new test, the Housing Delivery Test (HDT). The HDT measures net additional dwellings provided over the previous three years in a local authority area against the homes required.
11. The Ministry for Housing, Communities and Local Government (MHCLG) will publish the HDT results annually in November. The methodology for calculating the HDT is set out in its measurement rule book¹.
12. Those local authorities which do not meet HDT requirements will have to produce an Action Plan, underpinned by local evidence, detailing the reasons for under-delivery and how to increase delivery rates. Ultimately, those local authorities which provide less than 75% of their housing requirement annually will be subject to the presumption in favour of sustainable development.

¹ Available [here](#)

13. However, Government has indicated that in cases such as Greater Norwich where local planning authorities work in partnership to plan for growth through a joint local plan, housing delivery may be measured over the whole of the area being planned for rather than on a district by district basis. There is logic to this approach as a primary reason for local authorities co-operating through joint plans is that tightly bounded cities such as Norwich cannot meet their housing needs within their boundaries, therefore they must be met beyond them.
14. Whilst early indications suggest that the HDT is only likely to affect Norwich locally, once the results of the test are published consideration will need to be given as to how to address the issue. We will also have to indicate through the GNLP whether the districts will be measured separately or jointly for the purposes of the HDT.

The Next Steps

15. The NPPF's requirements will guide development of the overall growth strategy for the area, along with the wider policy framework in the GNLP. This work will include:
 - a. A GNDP member workshop on policy development scheduled for 13 November 2018;
 - b. A report on the Outline Strategy for the GNLP which is intended to be considered by the GNDP on 29 January 2019. The content of this report will be partly dependent on the timing and the outcome of the Government's review of the standard methodology for calculating housing need.

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