

# **Overview and Scrutiny Panel for Regeneration**

## ***Assigned Task Section 106 Planning Agreements***

**Final Report**

**Chris Hawkshaw (Community Co-optee)**

**February 2008  
Kirklees Metropolitan Council**

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## **Assigned Task - Section 106 Planning Agreements**

In August 2007, Chris Hawkshaw, a Voluntary Co-optee of the Overview & Scrutiny Panel for Regeneration, was appointed to undertake this assigned task on behalf of the Panel. The task required follow-up work to be undertaken on recommendations regarding Section 106 Planning Agreements made at previous Overview and Scrutiny Panel for Regeneration meetings in August 2005 and December 2006.

### **What is a Section 106 Planning Agreement?**

Section 106 of the Town and Country Planning Act 1990 made provision for the local Planning authority (i.e. the Council) to enter into an agreement with any person with an interest in land for the purpose of regulating or restricting the use or development of the land. Such regulation makes provision for entering into Planning obligations which provide for benefits which would offset the impact of the development in cases where it would be unreasonable to grant Planning permission without such an agreement e.g. provision of highways improvements, affordable housing or necessary school improvements.

### **How was the scrutiny task to be undertaken?**

Voluntary Co-optee Chris Hawkshaw undertook the work on behalf of the scrutiny Panel, supported by Jayne Purcell, Overview and Scrutiny Officer.

### **Description of Task**

- Follow up on recommendations made by the Scrutiny Panel for Regeneration in August 2005 and December 2006 with regard to Section 106 Planning agreements.
- Consider the current policy developments around Planning charges, Section 106, the Planning gain supplement bill and LDF development and assess the relevance of the recommendations.
- Identify those recommendations that are still relevant and – in liaison with Planning Services, develop an action plan to bring the outstanding recommendations to fruition
- Draft any additional recommendation necessary to ensure Kirklees Council is prepared for future policy change in this field

### **Key contacts identified at the outset**

Jonathan Barrett - Planning  
Patrick Auterson - Planning  
Andy Rushby - Planning  
Richard Pearson - Housing  
Jo-Anne Sanders - Education  
Steven Sampson - Highways

## **Expected Outcomes**

- A clear understanding of the recommendations still relevant in today's climate.
- A clear picture of the progress towards those relevant recommendations
- A clear and agreed action plan for bringing those recommendations outstanding to fruition
- A solid base for Kirklees Council to ensure it is prepared for future policy change in this field
- A report of the initial findings and a draft action plan by February 2008

## **Methodology**

- 1) Review of background papers
- 2) Desk update on progress against all recommendations
- 3) Interviews with key personnel in Planning and Audit Services
- 4) Interviews with key personnel in Housing, Education and Highways Services as consultees of Section 106
- 5) Feedback on emerging findings to consultees to confirm accuracy of content
- 6) Present conclusions and findings to the Overview and Scrutiny Panel for Regeneration

## **Background**

**In August 2005 the Scrutiny Panel for Regeneration met with Officers from the Planning Service to discuss the then current system of collecting and monitoring of developers' Section 106 agreements and associated funding/spend.**

### **The Panel concluded that:**

There were many different monitoring systems in place for Section 106 agreements and spend. The Panel was concerned that there were too many Officers involved in the process and no single Officer with a co-ordination role across services. The Panel felt that it was appropriate to recommend that Internal Audit review procedures for the monitoring and tracking of Section 106 spend to ensure that there was an accountable and transparent audit trail in place in all services dealing with Section 106 monies.

The Panel was concerned about the level of involvement by Councillors in agreeing what Section 106s should provide and the amount of information available on the progress of Section 106 agreements within their wards. The Panel agreed that there should be a corporate annual report produced for Councillors and the public that summarised Section 106 agreements and associated spend and indicated the progress on each scheme.

The Panel felt that Councillors wanted to be involved in how the monies were spent in their wards, and agreed that Councillors should be notified and

consulted on the spend of monies, particularly where Officers had no clear priorities for spend. It was acknowledged that this had to be in a relevant and appropriate way. The Panel also felt that Councillors would wish to be made aware of any difficulties regarding the progression of 106 agreements and the likelihood of any claw-back. A mechanism needed to be developed to ensure that ward Councillors were consulted and could access up to date information on request. The Panel felt that, in due course, information should be available on the website as part of the Planning application history.

The Panel felt that it was appropriate to review the Kirklees policies in relation to the use of Section 106s. As part of the review it was felt that Officers should consider the current thresholds and opportunities for using pooled sums for smaller or single dwelling developments. It was also agreed that consideration should be given to extending the range of services that could be provided through the use of Section 106 monies.

The Panel supported the creation of a dedicated Section 106 monitoring Officer post. The post holder would be able to put in place some of the reporting and information mechanisms that the Panel had recommended. The post holder would also be able to co-ordinate any actions arising from an Internal Audit of Section 106 processes across the council.

The Panel agreed to undertake a benchmarking exercise to see how Section 106 agreements were administered in other local authorities.

The Panel was concerned about the impact of numerous small developments on the highway network, which were not subject to Section 278s (provision similar to Section 106 agreements in existing Highways legislation). The Panel recommended that the Cabinet give consideration to current policies and seek to address the issue, possibly through the “community chest” approach whereby every development of one or more dwellings must pay a contribution.

The Panel concluded that the policy review work should be undertaken as soon as possible. Although the development of the Local Development Framework would give an opportunity to review policies, the Panel believed that such reviews would not take place in the immediate future; therefore this work should be prioritised and undertaken outside of the LDF process.

### **The Panel made the following 7 recommendations**

1. That Internal Audit carries out an audit of Section 106 procedures across the authority, including prioritisation and monitoring practices.
2. That a public, corporate, annual monitoring report summarising the spend and progress of all current Section 106 agreements be produced. The report should indicate the amount collected for each development, how it was spent and any unallocated monies. The report should also include details of any timeframe within which the monies should be spent and monies for which

projects had yet to be identified. The report would be circulated to all Councillors for information.

3. That, within the review of the Planning Service structure, a dedicated Section 106 Coordination and Monitoring Officer post be established.
4. That a process and systems be developed whereby Councillors are made aware of Section 106 agreements in their ward. That Councillors have the opportunity to influence the detail of the spend of Section 106 monies. That Councillors were made aware of areas of difficulty in progressing Section 106 agreements in their ward, in particular where there is a possibility of money being clawed back.
5. That Kirklees Council guidance and policies in relation to Section 106 agreements be reviewed. The review should include looking at the threshold levels and the opportunities to use pooled sums for smaller developments or single dwellings.
6. That a benchmarking exercise to look at other local authorities' policies regarding Section 106 agreements be undertaken by the Overview and Scrutiny Officer.
7. That the Cabinet consider current policies in relation to developers' contributions to highway infrastructure, in particular the cumulative impact of numerous small developments that are not required to make a contribution. The Cabinet is recommended to amend existing policy to allow a "community chest" approach.

**Cabinet subsequently accepted these recommendations, and a press release was issued in February 2006 summarising the concerns and recommendations of the Scrutiny Panel.**

**Officers agreed that a review of KMC Section 106 procedures would be undertaken and reported back to the Scrutiny Panel by June 2006.**

**A report back did not materialise until December 2006, the delay being due to a transitional period resulting from the appointment of a new Head of Service. Mr Barrett (the new Head of Planning Services) met with the Panel to outline progress. The Panel felt that very little progress - if any - had been made towards the recommendations made in August 2005.**

**Mr Barrett proposed a further set of recommendations (summarised below), which were found to be in line with the original recommendations, and which the Panel endorsed:**

8. The development of a Planning gain and developer contribution management system based on a single corporate data base, recording agreements, contributions, trigger points, responsibilities and deadlines.

9. The creation of a dedicated Planning gain monitoring, management and compliance role to ensure optimum utilisation of developer contributions.
10. The development of up-to-date Planning obligation policy in the form of a Single Planning Document (SPD), which reflects current and projected programmes in the beneficiary service areas.
11. The documentation of the Council's approach to developer contributions (standard charges & formulae) to demonstrate the connection between contributions and the provision of strategic social and economic infrastructure
12. The implementation of the agreed Kirklees Special Economic Zone (KSEZ) levy mechanism in accordance with adopted SPD.

**The Panel also made the following recommendations:**

13. To accept the recommendations outlined in Mr Barrett's report highlighted in bold in the minutes
14. That legal services should provide information on new Section 106 agreements to ward Councillors and that Planning Services should provide updates on those Section 106 agreements as part of the information provided on Planning applications.
15. That Councillors and Officers of the council needed to undertake detailed thinking around the issues of developer contribution and ensure this is reflected sufficiently in the Local Development Framework, especially in relation to the impact of development on water-courses
16. That Officers of the Council pursue the potential for developing a consistent approach regionally and / or a set of principles when in negotiations with developers.
17. That Officers provide the Panel with an update in approximately 6 months time.

**Progress against recommendations:**

In September 2007 Mr Hawkshaw (supported by Jayne Purcell, Overview & Scrutiny Officer) met with Senior Officers from Planning and Internal Audit Services. It should be acknowledged that there had been significant uncertainty and changes to the leadership of Planning Services during 2005 and 2006 and therefore the Planning Officers interviewed were not necessarily responsible for taking the Section 106 recommendations forward in 2005.

The Officers were Andy Rushby, Assistant Head of Service for Planning, Patrick Auterson, Policy Manager for Planning and from Internal Audit, Martin Dearnley, Internal Audit Manager.

In the interests of clarity and the fact that a number of the recommendations from 2005 and 2006 were similar in their nature, for the purposes of this report a number of the recommendations have been reported back on as one key recommendation.

#### Recommendations 1

That Internal Audit carries out an audit of Section 106 procedures across the authority, including prioritisation and monitoring practices.

*It had been agreed that Internal Audit Service would carry out this work in conjunction with the establishment of the revised procedures for Section 106. However, due to the delay in establishing a revised procedure, this work could not be undertaken.*

#### Recommendation 2

That a public, corporate, annual monitoring report summarising the spend and progress of all current Section 106 agreements be produced. The report should indicate the amount collected for each development, how it was spent and any unallocated monies. The report should also include details of any timeframe within which the monies should be spent and monies for which projects had yet to be identified. The report would be circulated to all Councillors for information.

*Planning Service advised that once the new software system was in place (May 2008) they would be in a position to provide an annual statement. It was noted that other services in the council also collated and monitor Section 106 (e.g. Housing Service, Children and Young Peoples Service and Highways Service), and that these services are in a position to provide this data now.*

#### Recommendation 3 & 9

3. The Panel endorses the proposal within the review of the Planning Service structure that a dedicated Section 106 coordination and monitoring Officer post be established.

9. The creation of a dedicated Planning gain monitoring, management and compliance role to ensure optimum utilisation of developer contributions.

*Planning Service has had some uncertainty and change in their leadership from approximately September 2005 to March 2006 and from April 2007 has been undergoing a radical service review. Within the new structure there is a proposal for a Section 106 Monitoring and Compliance Officer. The post is envisaged to be graded at Senior Office 1 and is proposed to be managed by the Enforcement Team Leader. It is hoped that the implementation of the review will take place in May 2008. However the Council is awaiting the outcome of single status, which adds a further dimension to the review.*

#### Recommendation 4 & 14

4. That a process and systems be developed whereby Councillors are made aware of Section 106 agreements in their ward. That Councillors have the opportunity to influence the detail of the spend of Section 106 monies. That Councillors were made aware of areas of difficulty in progressing Section 106



agreements in their ward, in particular where there was a possibility of money being clawed back.

14. That legal services should provide information on new Section 106 agreements to ward Councillors and that Planning Services should provide updates on those Section 106 agreements as part of the information provided on Planning applications.

*Councillors will shortly be able to access information on Section 106 via the website. Councillors have the opportunity to provide valuable local information to Officers who maintain a "priority list" particularly in the case of parks and open spaces.*

Recommendation 5, 7, 10, 11, 12, 15, 16

5. That Kirklees guidance policies in relation to Section 106 agreements be reviewed. The review would include looking at the threshold levels and the opportunities to use pooled sums for smaller developments or single dwellings.

7. That the Cabinet consider current policies in relation to developers' contributions to highway infrastructure, in particular the cumulative impact of numerous small developments that are not required to make a contribution. The Cabinet is recommended to amend existing policy to allow a "community chest" approach.

10. The development of up-to-date Planning obligation policy in the form of SPD which reflects current and projected programmes in the beneficiary service areas.

11. The documentation of the Council's approach to developer contributions (standard charges & formulae) to demonstrate the connection between contributions and the provision of strategic social and economic infrastructure

12. The implementation of the agreed KSEZ levy mechanism in accordance with adopted SPD

15. That Councillors and Officers of the council needed to undertake detailed thinking around the issues of developer contribution and ensure this is reflected sufficiently in the Local Development Framework, including the issue of water courses

16. That Officers of the Council pursue the potential for developing a consistent approach regionally and or a set of principals when in negotiations with developers.

*These recommendations are all policy related, making reference to the ideas of pooled sums, community chest, SPDs, standard charging and formulae.*

*The Planning and Compulsory Purchase Act 2004 made provision for the payment of planning contributions in the form of a levy on the uplift in the value of land arising from the grant of Planning permission to be known as the Planning Gain Supplement. Opposition to what was effectively a 'betterment tax' led to the Government abandoning this proposal in October 2007.*

*The Planning Reform Bill currently out for consultation includes the preferred Government option of a Community Infrastructure Levy (CIL). The wording of the Planning Bill opens up the possibility that CIL might be turned into a more*

*general tax on developments as it will allow local authorities to apply a levy to all new developments (residential and commercial) with low de minimis thresholds. It is likely that, if introduced in the Planning Act 2008, such provision would be used to supplement negotiated (S106 type) agreements the use of which will be scaled back to cover mitigation of direct impacts and to deliver affordable housing.*

*As is apparent, Government policy and legislation is currently under review and is likely to be subject to major change in 2008. In some part, the Panel's recommendations have been superseded by these emerging national policies (such as the Planning Reform Bill); however, it was acknowledged that KSEZ was making good progress and is being monitored by the Scrutiny Panel.*

*Development work on the Local Development Framework is making good progress and the Scrutiny Panel will continue to monitor its progress. In the original discussion in August 2005 the Panel expressed a desire to see this work being done outside and before the timescales of the LDF using KSEZ as a model has proven to be beneficial for future developments in the Planning and Reform Bill.*

*With regards to recommendation 16 (which hoped to reduce the opportunity for developers playing off one local authority with another local authority), it is envisaged that this will be pursued by the City Regions developments and may feature in the Multi Agency Agreement arrangements.*

#### Recommendation 6

6. The Panel agreed to undertake a benchmarking exercise to look at other local authorities' policies regarding Section 106 agreements (the research to be undertaken by the Overview and Scrutiny Officer).

*This work was undertaken, but due to the change in climate nationally the work is now felt to be out of date and of little relevance.*

#### Recommendation 8

8. The development of a Planning gain and developer contribution management system based on a single corporate data base, recording agreements, contributions, trigger points, responsibilities and deadlines.

*Significant progress has been made in the last 12 months in drawing together for the first time information on **all** the Section 106 obligations that have been (or are being) negotiated over the last five years. This database gives a common source of information for all Services (including Legal, Highways, Housing, Culture and Leisure and Children & Young People's) to enable closer tracking and monitoring of payments, financial allocations and compliance. The database is now complete and quality checking of this information has been undertaken. The database is now the responsibility of the Planning and Building Control Service under the day-to-day management of the Enforcement Team Leader.*

*Monitoring of the database is done by checking each 'live' Section 106 agreement to identify trigger points, discussing the agreements with the relevant case Officer and by liaising with other services (who are responsible for the delivery of many of the outcomes of these agreements) to ensure that the agreement is being implemented. It is intended that this database will be made available to all Council services (and Councillors) so that these "trigger points" can be identified by any interested party within the Council, and not just the person responsible for monitoring the database. A project is being developed in association with Internal Audit to make sure that a clear procedure is established in this respect.*

Recommendation 13 & 17

13. The Panel accepted the recommendations outlined in Mr Barrett's report highlighted in bold in the minutes

*Not applicable*

17. That Officers provide the Panel with an update in approximately 6 months time.

*Not applicable*

### **Conclusions from interview with Planning and Internal Audit Services:**

That if the first set of recommendation had been implemented at that time, (2005) it would have prepared Planning Services for the considerable change in policy surrounding Planning levies and supplements, indeed the direction of those recommendations pre-empted the new policy from Central Government.

There were key factors for the delay in implementation of recommendations:

- Past 3 years - Target driven focussing on the determination of Planning applications with monetary incentive in the form of Planning Delivery Grant for the Council. This resulted in a perverse action, as Section 106 agreements took a back step on priorities, which in turn has lost the Council revenue through this route.
- Head of Services Changes;  
2005 Phil Cook, interim placement  
2006 Andy Rushby, Acting Head of Service, for 3 months  
2006 (March) Jonathan Barrett, New Head of Services
- 2007 A large scale Planning Service review and restructure coupled with Single Status

While the proposals for a dedicated Officer was a move in the right direction, the original discussion in 2005 spoke of a co-ordinating role across services, and the proposed post does not cover the aspiration of the Panel. The main weakness is in information available from Planning Service and their overall co-ordination of the Strategic Section106 picture. The proposed post does not deal with issue raised in 2005. The Panel was concerned that there were too many Officers involved in the process and no single Officer with a co-ordination role **across services**.

The monitoring of Section 106 within the Planning Service has been poor, but great effort had been made in recent months to rectify this. Planning is now in a position to provide facts and figures relating to Section 106s from 2002 onwards.

The Audit role could be played out in two directions

- 1) Test the post 2002 list of contributions for accuracy or
- 2) Move forward and assist Planning to develop a system that creates an audit trail sufficient to extract information, for analysis and audit reporting requirements.

It was felt that the “move forward” approach most closely reflects the priorities agreed previously by the Overview & Scrutiny Panel.

This Overview & Scrutiny investigation acknowledges the pressure the Planning Service was under to achieve national targets relating to planning applications and supports a more qualitative approach to monitoring planning performance. It is hoped that the new Planning Bill goes some way to achieving a more sophisticated approach to monitoring planning performance so as not to divert energies in a perverse way in the future.

It was acknowledged by the Planning Service that they had been risk averse in negotiation of Section 106's with developers and therefore had not maximised the income generation of Section 106. This however cannot continue, and therefore recommendations 7 & 8 later in the report seek to address this by cross services training, learning sessions and improved Officer knowledge of Section 106 regulations.

Little or no involvement of Councillors in the process has weakened the effectiveness of Section 106 agreements and its ability to increase resident's quality of life. Councillors are in a unique position to provide Officers with qualitative information about their local area and its needs, but this resource has not been used. More should be done to raise the profile of Councillor's role in shaping the S 106 spend in their local area. Within the discussion with Officers it was agreed that Councillors should be able to influence the priorities Section 106s are used for and should be informed of any completed Section 106 agreements within their wards.

### **Findings from interviews with internal consultees**

Although the Planning Services is responsible for Section 106 agreements, it was recognised that other services within the council have a key role to play as consultees and beneficiaries in ensuring the better implementation of Section 106 agreements. The following notes summarises the findings of discussions with council Officers from these Services.

The Officers were Richard Pearson (Regeneration and Development Officer, Strategic Housing), Steve Sampson (Group Engineer and Acting Development Control Manager, Transportation), Jo-Anne Sanders (Schools

Place Planning Officer, Children and Young Peoples Services). It is acknowledged that given more time it would have been beneficial to meet with Officers from Legal and Culture & Leisure Services.

### **Common Themes**

It appeared that using the term “consultee” as a legal term used in Planning law was a barrier for communicating with internal services. The relationship between services was often a paper exercise, passing a Planning application from one service to another for “comments”. This led to a lack of joined up thinking and working, leaving each section to manage the process as best they could.

Legal wording of a Section 106 was felt to be crucial in the outcome and flexibility of an agreement; however, Legal Service’s involvement is generally only at the end of the process.

Consultees did not produce monitoring information for Planning and were left to develop their own systems of monitoring Section 106 agreements within their service.

These “consultees” had a very tight timescale to enter in to negotiations with developers, often as little as 10-11 weeks.

Cross service meetings happened infrequently. While the Planning Service is the legal owner of Section 106 agreements, there is no overall co-ordinated role within the Service.

While Section 106 and Section 278 are often used for infrastructure improvements, neither of these tools have been used to improve surface water disposal. Developments often put a strain on drainage systems and have an effect on the amount of surface water but it appears these considerations are not taken into account.

### **Conclusions from interviews with internal Consultees**

There is a need to co-ordinate the support that Officers across services receive in negotiating and monitoring Section 106.

It appears very little cross-Service discussion has happened between Planning, Housing and Education and Highways to monitor, evaluate and improve systems and productivity.

Poor communication between services has led to Officers not understanding their role in the strategic picture, becoming departmentalised and pigeon-holed and being less effective in their roles as a result.

Better cross service monitoring and information systems need putting in place.

## Recommendations

- 1) That previous recommendations 1, (3 & 9), (4 & 14) & 8, continue to be relevant in today's climate and should to be monitored for progress by scrutiny subject to the caveats in the recommendations below.
- 2) That all Officers involved in section 106 agreements actively seek views from Councillors, this should be done in a co-ordinated way and at regular intervals and that the outcomes should be used as intelligence when establishing priority lists for potential Section 106 agreements.
- 3) That Councillors are up-dated individually of any Section 106 agreements that relate specifically to their ward, and not by postings on a website.
- 4) That Planning Service increase the responsibility of the proposed new Monitoring and Compliance Officer post to provide a co-coordinating – overview / strategic role and link this role with Design & Property Service, Housing, Highways, Education, Partnership & Procurement Service, Economic Development Service etc.
- 5) That an action plan be developed, identifying timescales, Officer responsibility and reporting intervals to monitor the recommendations in this report.
- 6) That recommendation 5, 7, 10, 11, 12, 15, 16 do not need reporting on as “recommendations” stemming from a scrutiny report. However the issues covered in the recommendations should remain the subjects of Overview & Scrutiny Panel updates.
- 7) That problem-solving / learning sessions are established between all key internal Council Services involved with Section 106 agreements (including D&PS, Housing, Legal, Education, Planning, P&PS, EDS etc.).
- 8) That Senior Officers seek to improve Officer understanding of Section 106 and their role in the strategic picture through the PDR process and training.
- 9) That work be undertaken to gauge the opportunity to include surface water disposal and drainage improvements as part of Section 106 and Section 278 agreements.

**The recommendations were adopted by the Overview & Scrutiny Panel for Regeneration at its meeting of February 2008, following which the Cabinet Regeneration Portfolio Holder endorsed the following slightly modified recommendations:**

### **Recommendations for Action Plan**

1. That Internal Audit carries out an audit of Section 106 procedures across the authority, including prioritisation and monitoring practices.
2. That a public, corporate, annual monitoring report summarising the spend and progress of all current Section 106 agreements be produced. The report should indicate the amount collected for each development, how it was spent and any unallocated monies. The report should also include details of any timeframe within which the monies should be spent and monies for which projects had yet to be identified. The report would be circulated to all Councillors for information.
3. That the Planning Service creates a Section 106 Strategic Co-ordination and Monitoring Officer post, to provide a strategic development roll that links the work of D&PS, Housing, Highways, Education, Legal, P&PS EDS etc. This post would also be able to co-ordinate the actions arising from the Scrutiny Section 106 report 2008 and report back to Scrutiny in 12 months time.
4. That a process and systems be developed whereby Councillors have the opportunity to influence potential Section 106 agreements in their ward and are provided with relevant information relating to Section 106 agreements in their ward and across the district. This should be done in a co-ordinated way and at regular intervals.
  - That Councillors have the opportunity to influence the possible areas for developing Section 106 agreements. By Officers involved in section 106 agreements actively seek views from Councillors, and those views used as intelligence when establishing priority lists for potential areas for Section 106 agreements.
  - That Councillors are up-dated individually of any Section 106 agreements that relate specifically to their ward, and not by a postings on a website.
  - That Councillors are made aware of areas of difficulty in progressing Section 106 agreements in their ward, in particular where there is a possibility of money being clawed back.
5. That an action plan be developed, identifying timescales, Officer responsibility and reporting intervals to monitor the recommendations in this report.
6. That recommendation 5, 7 (2005) and 10, 11, 12, 15, 16 (2006) do not need reporting on as "recommendations" stemming from a scrutiny report.

However the following issues covered in the recommendations should remain the subjects of scrutiny updates:

- Pooled sums, smaller developer contributions
- Small developer contributions to highway infrastructure (Cumulative Impact) “Community Chest approach”
- Roll out of SPD’s through the LDF process
- KSEZ developments
- Progress on the LDF, including the issue of water courses.
- Potential for developing a consistent approach regionally and or a set of principals when in negotiations with developers.

7. That problem solving / learning sessions are established between all key internal Council Services involved with Section 106 agreements (including D&PS, Housing, Legal, Education, Planning, P&PS, EDS etc.).

8. That Senior Officers seek to improve Officer understanding of Section 106 and their role in the strategic picture through the PDR process and training.

9. That work be undertaken to gauge the opportunity to include surface water disposal and drainage improvements as part of Section 106 and Section 278 agreements.

10. The development of a planning gain and developer contribution management system based on a single corporate data base, recording agreements, contributions, trigger points, responsibilities and deadlines.