

The Sustainable Communities Act proposal form

Using this form

This form should be used to submit proposals under the Sustainable Communities Act to the LGA for short listing. Please complete all sections and then email a copy to selector@lga.gov.uk. These must be received by **July 31st 2009**, and you will receive confirmation that the form has been received.

Once submitted, information within this form may be made publicly available, unless you request for it to be kept private. We will treat information submitted sensitively. If you wish to attach any relevant presentations or graphs etc., please attach them separately in the email.

For questions regarding the act or the role of the Selector, please see our [FAQs](#). Any further questions can be directed to selector@lga.gov.uk.

Section 1: Proposal Summary

Proposing Authority

Under the terms of the Sustainable Communities Act, all proposals must be submitted by a local authority, or group of authorities, in England. Any group, organisation, or individual may originate or develop a proposal. However all proposals will require Local Authority endorsement and submission to the Selector.

Parish councils and other organisations and agencies must seek support and formal endorsement from a proposing local authority (defined in the Act as county councils, district councils (including metropolitan, non-metropolitan, and unitary authorities), the common council of the city of London, or the Council of the Isles of Scilly).

1.1 Lead Authority name

South Hams District Council

1.2 Is this proposal submitted by this authority alone, or is it a joint proposal with other local authorities? (If joint, please list authorities)

1.3 Who is the lead contact (s) in the authority for this proposal? Please provide email address and telephone number - *The LGA will direct any enquiries to this contact.*

Laura Payne, Policy Implementation Officer
laura.payne@southhams.gov.uk 01803 861325

Supporting Organisations

Whilst proposals may only be submitted by a local authority, we acknowledge that local partners and outside organisations may wish to register support for the proposal. This is entirely voluntary.

1.4 Please provide details below of supporting organisations to your proposal. Please explain if the organisation is a charity, company, unincorporated association or other body. If a charity or company, please provide registration numbers. If a local partnership please explain the relationship to the Local Strategic Partnership for the area.

Devon and Torbay Post Office Task Force. A partnership of representatives of Members and officers from all district councils in Devon, Devon County Council, Torbay Council as well as Dartmoor National Park and representatives from the community sector. The Task Force worked closely with Postwatch (the former watchdog for postal services). The Task Force was formed to make representations to Post Office Limited to counter its proposals for Post Office closures in the Devon Area Plan.

Mid Devon District Council has also expressed support for this proposal.

Summary of your proposal

Please summarise your proposal. You may wish to include:

- The main elements of your proposal
- What issues your proposal is addressing and how it will promote the sustainability of the local community
- Who is affected by this proposal and how?
- Which public bodies might be affected?
- What are the main actions needed from Government?
- What do you expect this proposal to achieve?

1.5 Please enter your summary below (word limit 1000 words)

Main elements: That the Government gives a commitment not to enter into any further Post Office closure programmes and to sustain a national network of around 12,000 Post Offices, establishing a Post Bank, and re-introducing lost or curtailed services, bringing the UK inline with most of its EU counterparts, who run successful, profitable post office networks offering a wide range of personal and business accounts in addition to mail, government and other services.

Issues Addressed: Our rural communities have seen a continual withdrawal of services, particularly by national providers, mainly under the mantra of efficiency and rarely with any heed to the realities of life particularly for isolated and deprived communities. In May 2007, following a national public consultation, the Government announced a range of measures to modernise and reshape the Post Office network and put it on a more stable footing. This included the compensated closure of up to 2,500 branches representing about 17.5% of the total network, and the introduction of around 500 'outreach services'. This change programme was conducted against a backdrop of continuing turbulence within the sector. Branch closures in Devon were considered as part of an Area Plan that

was published in May 2008 covering Devon, Plymouth, and Torbay (based on Parliamentary Constituencies).

In July, following a six week period of consultation, Post Office Limited announced that:

- it would retain 333 branches and proceed with 37 closures and 32 outreach services. Changes would take effect between August and Autumn 2008;
- they would not proceed with two proposed closures in Torbay and would replace them with two further branches in Devon;
- Consultation on the replacement branches concluded in September and a decision was taken to proceed with their closure;
- 7 branches were 'escalated' making them subject to further review by Postwatch (the watchdog for Postal Services) and Post Office Ltd. A decision was taken to close all branches and replace five with outreach services;
- Decisions in respect of the Devon element of the Devon and Cornwall Mobile Post Office were suspended until the conclusion of the Area Plan Proposal for Cornwall in September 2008. A decision was taken to permanently withdraw the service to three communities and replace a further two with a Home Service.

Who is affected: Those affected are all those who are reliant on their local Post Office for vital services within a small town or village. Those particularly affected by recent Post Office closures are those communities and individuals who are already marginalised from society, either due to a disability, their age or their rural location. Post Offices can be the life-line to small communities where it is the only service remaining within the local area.

Main Actions from Government:

- Government to commit / legislate not to enter into any further closure programmes and provide adequate funding to sustain a national network of around 12,000 Post Offices nationally, including around 340 in Devon and Torbay;
- The Government (including all departments) develops a vision for the future of the Post Office network to ensure its sustainability and acknowledge its social role;
- Government to introduce legislation and a policy framework to establish a Post Bank.

Benefits of Proposal:

If local communities are to be sustained the interconnectedness of local services needs to be recognised. Post Offices cannot be seen in isolation from other essential services, the loss of any one of which may put other services at risk.

Quote from local Post Master, South Devon "We are a focal point, a place where people live close by come on a daily basis – sometimes we know we are the only ones they talk to, we give advice and help in many non-Post Office matters"

Quote from resident in village where post office faced closure, "Our cohesive community faces disaster if this closure goes ahead. There has been a Post Office and shop here for 60 years and local people will suffer if it shuts." Post Offices are the heart of rural communities, if this proposal is implemented it will keep rural communities alive, prosperous, connected, and above all sustainable.

Section 2: About your proposal

The form asks a set of questions to gather as much information as possible to allow for assessment and short-listing by the Selector. A word-limit is stated for each part of the form.

We appreciate that SCA proposals will vary in range and scope, and some questions will be more relevant than others for any one proposal. Please do not feel that answers are required for every questions or that the full word limit need be used in respect of each and every question box. If you are submitting a joint proposal, please include evidence for all areas.

Impact on sustainability *(word limit 2000 words)*

2.1 Please explain how your proposal promotes sustainability as defined locally (for example in your Sustainable Communities Strategy or LAA)

Within our SCS, we have defined sustainable development as '*taking into account the future affects of our activities so that the ability of future generations to meet their own needs is not compromised*'. Our SCS aims to ensure that communities in the South Hams continue to be desirable places to live and work, with good quality local public services and an environment to cherish. It also aims to reflect the local culture of South Hams, ensuring promotion of equality and diversity. By maintaining a viable network of Post Offices within the UK and particularly in rural areas, this will contribute wholly to our sustainable agenda as:

- Communities will have quality local services;
- Local jobs will be created / sustained;
- There will be less reliance on cars to shop out of villages and town centres, which will reduce carbon footprint and improve the living environment;
- Post Offices promote community spirit, a culture essential for hard to reach groups in rural areas who are often isolated such as the elderly and disabled.

2.2 Over which geographic area will your proposal impact? (e.g. neighbourhood, town, city, sub-region)?

This proposal should be implemented nationally; however its impact will be felt at every neighbourhood / village level. A strong Post Office incorporating a Post Bank and other local public services will become the hub of a community, having a positive ripple-effect for community initiatives and cohesion throughout the local area.

2.3 Who would benefit from your proposal?

When the Post Office announced its closure programme for Devon in the Devon Local Area Plan, Post Office Ltd received 7,500 representations from local people. This response was second only to London residents and demonstrates the strength of feeling in the local area. Those who would most benefit from the implementation of this proposal and the saving of the current post office network, as well as the potential to re-instate some of the lost centres, would be those individuals of the community who are of most need. For example the elderly, young people, those with a disability and those without the use of good local public transport. Rural communities in Devon are becoming the 'Ghost towns' of the 21st Century, with a lack of facilities, a large percentage of second homes in certain areas and a lack of community spirit. The rural populations' reliance on cars and larger shopping centres is unsustainable.

2.4 What steps will you take to mitigate any adverse affects on sustainability from your proposal (if relevant)?

By legislating for Post Offices to provide vital new services as well as reinstating services such as banking and council outreach facilities, the network should become sustainable and require less funding from central sources.

2.5 What project, activities and changes would take place in your area if your proposal was successful?

Fundamentally, there would be no further enforced closures. It is possible that some closed offices might re-open in parallel with the introduction of new and improved services, especially a fit-for-purpose banking service. The effect would be to improve the sustainability of small rural settlements and a big step forward in terms of social inclusion.

2.6 Does your proposal involve transfers of responsibilities between public bodies in the area? If so what are these? What budgetary implications might be involved?

N/A

Local authorities are required to 'have regard' to a set of specific issues when deciding whether to support SCA proposals. These are matters listed in Schedule 1 of the Act, as passed by Parliament¹. It is worth noting that the issues listed in the Act are not supposed to be exhaustive and that ideas can cover anything that promotes the sustainability of the local area.

Many of these matters may not be relevant to any one proposal. If you are submitting a joint proposal please include evidence for all areas.

2.7 Please identify which, if any, of the issues authorities are required to have regard to, are relevant to this proposal and include any data and information that you feel would be helpful in the assessment process.

a) the provision of local services

Post Offices are already essential local services for rural communities, commonly offering products for sale beyond regular postal services. However, due to recent legislative / policy changes, the post office's provision of services has been reduced, for example removing purchasing of TV Licences and State Pension Provision. By reinstating certain services and introducing new services such as banking and Local Government outreach services, Post Offices will once again be the centre for local service provision, the heart of a rural community.

b) the extent to which the volume and value of goods and services that are- i) offered for sale, ii) procured by public bodies, and are produced within 30 miles (or any lesser distance as may be specified by a local authority in respect of its area) of their place of sale of the boundary of the public body.

Post Offices have diversified in some areas to offer local produce for sale. However where Post Offices have been closed this outlet for the sale of local goods is frequently no longer viable on its own and itself faces closure. There are many examples of this occurring – effectively producing a double blow to the community with the opportunity for that sale of local goods is removed. A sustainable Post Office network will improve opportunities for diversification and increase the number of outlets available for local produce. This would also have positive knock-on effects to local producers and consumers.

c) the rate of increase in the growth and marketing of organic forms of food production and the local economy

As the above, Post Offices can contribute to organic produce by providing an attractive outlet opportunity - a place where the community will be going to pay bills, post items, check their bank balance etc.

d) measures to promote reasonable access by all local people to a supply of food is adequate in terms of both amount and nutritional value

Local Post Offices may usually be the only store within a rural community. Therefore, the increase in number and diversification of produce / partnerships would ensure that there is a local supply of food within walking distance rather than driving which is unsustainable.

e) the number of local jobs

Reinstating lost services and introducing new services will result in the Post Office becoming sustainable and opening new stores, creating more jobs for local people.

¹ The Sustainable Communities Act is available here : http://www.opsi.gov.uk/acts/acts2007/ukpga_20070023_en_1

- f) measures to conserve energy and increase the quantity of energy supplies which are produced from sustainable sources within a 30 mile radius of the region in which they are consumed
- g) measure taken to reduce the level of road traffic including, but not restricted to, local public transport provision, measures to promote walking and cycling and measures to decrease the amount of product miles

As mentioned above, the convenience of a local post office will prevent car travel for the convenience of having a useful store within walking distance of the local community. Trips for smaller 'jobs' such as getting cash, lottery ticket, loaf of bread, buying a stamp, paying council tax bills will be much reduced by having a 'one-stop-shop' for useful services.

- h) the increase in social inclusion, including an increase in involvement in local democracy
- i) measures to increase mutual aid and other community projects
- j) measures designed to decrease emissions of greenhouse gases
- k) measures designed to increase community health and wellbeing

Community well-being will be greatly improved by reinstating or introducing new post offices in rural areas, particularly where one has been forcibly closed. Post Offices act as a hub to small communities; a visit to the local Post Office to collect a parcel can sometimes be the only time an older person speaks to another person for the whole day. A community can be built around a focal point of the Post Office and many rural communities in Devon have been broken by the loss of their local store.

- l) planning policies which would assist with the purposes of this Act, including new arrangements for the provision of affordable housing
- m) measures to increase the use of local waste materials for the benefit of the community

Existing Barriers

(Please do not write more than 1000 words for 2.8 and 2.9)

2.8 What are the existing barriers to implementing your proposal?

- The policy decision by the Government in 2007 to reshape the Post Office;
- The removal of services provided by the Post Office, whether directly by policy decision by Post Office Ltd or indirectly due to encouragement by the government and private companies for bills to be paid directly by Direct Debit, as well as the removal of vital services such as pension collection;
- The need for the Government to recognise the value-added role of the Post Office network as a community builder, not just a money-making service;
- The ability for the Government to reinstate services and be innovative on legislating for a PostBank, similar to those across Europe as well as other new services.

2.9 What actions are needed by Government to make your proposal possible?

- Government to commit / legislate not to enter into any further closure programmes and provide adequate funding to sustain a national network of around 12,000 Post Offices nationally, including around 340 in Devon and Torbay;
- The Government (including all departments) develops a vision for the future of the Post Office network to ensure its sustainability and acknowledge its social role;

- Government to introduce legislation and a policy framework to establish a Post Bank.

Part 3: Local Authority Endorsement

This section should be completed by the proposing local authority. (Under the terms of the act this means a county council in England, a district council (including metropolitan, non metropolitan and unitary authorities), a London borough council, the Common Council of the City of London or the Council of the isles of Scilly)

3.1 Have consultation requirements been met? (500 words max)

Please confirm that your authority has met the statutory requirements for consultation on this proposal, via one or more panels of local representatives and persons from under-represented groups constituted in accordance with the Act and statutory guidance as set out in [*Strong Safe and Prosperous Communities*](#).

You may wish to describe who has been involved in discussions and development of the proposal (*e.g. council, local community organisations and residents groups, parish or town councils, local partnership bodies, local or national organisations, political parties, church and faith organisations, local businesses or chambers of commerce and others.*)

If you have not done so already please give brief details of relevant panel meetings.

Please note if you are submitting a joint application please provide details of consultation and local support across all areas.

South Hams District Council developed the scope of our implementation plan by taking into account the requirements of the Act, as well as the viability of successful implementation through limited time and resources.

Our proposals were raised at a special Sustainable Communities Act event for the Community Partnership Forum (CPF) and all South Hams District Council Members on 23rd February 2009. The CPF exists under the South Hams Strategic Partnership (SHSP) and consists of close to 200 organisations including voluntary, community, church and faith, statutory organisations and charities, as well as all of our local town and parish councils. Members of the SHSP and other interested local district councils and Devon County Council were also invited to attend. Members of the CPF include organisations that represent under-represented groups within the district such as BME and youth groups. Both these groups were able to attend the event.

At the event, close to 200 proposals were raised and discussed and a shortlist was created by attendees voting on the proposals they would like to see taken forward. The shortlist of eleven proposals was formulated into a survey for our Community Sounding Board. Our Sounding Board is a panel of close to 1,000 local residents that are demographically and geographically representative of our whole community; this Panel also included under represented groups. We felt it was necessary for our wider community to rank the shortlist in order of importance to the local community as, at the time of planning, we were uncertain of the time available and resources required to write proposals up for submission due to the unknown publication date and style of the LGA Submission Form. We felt that, as there was a risk not all of our proposals would be written-up in time, we had to focus our resources on those of most importance to our community.

We feel that by involving more than one 'panel' both containing under represented groups / individuals and agreeing our proposals with a large number of our community, that South Hams District Council has met the requirements of the Act.

3.2 What are the views from this consultation? You may wish to provide evidence of local support for your proposal. This might include petitions or letters of support from the public, local councillors, Members of Parliament, businesses, public bodies and agencies. Please describe this evidence below. *(The local authority submitting the proposal is likely to wish to review such material and to summarise its content. Onward submission to the Selector of all original documentation will not normally be required).*

This 'Post Office Proposal' was put forward by one of our officers and was part of a list of example proposals we placed on the tables of the CPF event to help stimulate discussion. There was no requirement for any of the examples to be put forward unless support was given from the community or one of our attending Members. The proposal was supported by one of our Members and was voted on by all who attended the event. This proposal received 17 votes from the CPF event, and was placed 9th out of the 11 proposals short listed that received 10 or more votes. The Community Sounding Board voted this proposal as their top priority out of the eleven short listed, receiving 21% of the total votes.

This proposal is largely based on the work of the Devon & Torbay Post Office Task Force, of which South Hams District Council was a key contributor and member. The Task Force endorses this proposal.

Mid Devon District Council has also expressed their support for this proposal.

Proposals may include a change/transfer of functions from one person to another. If this is relevant to your proposal please confirm that the duties under clause 2, subsection 3 of the act (consulting with organisations affected by a change in location of a function) have been carried out.

3.3 Please give brief details of consultation with any affected organisations

N/A

3.4 Confirmation of council support

The process for formal endorsement is a matter for local discretion; however we anticipate that authorities will wish to gain political endorsement and clearance for the proposal through the relevant processes at local level. Please give details of how formal approval has been attained.

A report detailing all eleven proposals short-listed from our CPF event and ranked by our Sounding Board was taken to the South Hams District Council Executive Committee on 16th July 2009.

The Executive resolved to endorse / approve this proposal for submission to the LGA for consideration for implementation under the Sustainable Communities Act.

3.5 General comments

This is an opportunity for the local authority to express any additional comments or views on the proposal: This may include: *(1500 words max)*

- the council's view of levels of local support for the proposal
- any local opposition or objections that the Selector should be aware of
- relevance of the proposal to the area's Sustainable Community Strategy and Local Area Agreement
- outcome of any local authority discussions with agencies or public bodies affected
- potential regional/national significance of the proposal, if replicated elsewhere
- any major resource implications for the council or its local partners
- any other factors influencing viability and achievability of the proposal

- 1) The Post Office Network Closure Programme has generated a highly emotive, negative response from the residents of the South Hams. It is seen as a big blow to the heart of many rural communities whose access to services is already limited. In those frequent cases where a post office outlet listed for closure has been linked to a sole village shop, the overall viability of that critical retail service is severely threatened to the point of failure and closure as a result. In such cases, a double-blow threatens the sustainability and viability of the affected communities themselves.
- 2) There is a sense that the Post Office has been decimated by the withdrawal of important products over the years and that vulnerable (the elderly, immobile, and generally disadvantaged) consumers in the deprived rural areas have consequently suffered. The network clearly needs to offer a wider range of core services, not to have them systematically removed. It is self-fulfilling that footfall and revenues have fallen under these circumstances.
- 3) To secure the future of a viable Post Office Network requires the long-term establishment of a range of core services and the reintroduction of many that have been lost in the past. Its much trusted brand needs reinforcement to ensure its customers are aware of the extent of such services. The unrivalled network is well-placed to deliver opportunities to transact with local authorities and other public sector agencies. The PO Card Account contract must be maintained and a giro bank equivalent reinstated. This requires central government commitment over the longer term.

Recommendations for Action – Response from South Hams District Council

1. What Services should the Post Officer offer:

- **from government?**

Universal re-introduction of lost or curtailed services – DVLA, pension receipts, utility bill payments, sale of TV licenses, driving licenses, passport applications (all without discrimination over technological alternatives)

- **from local authorities?**

Introduce facility for payment of – benefit receipts, council tax payments, rents / mortgages, fines, passes, and other public service bills

- **from other sources, including services in competition with Royal Mail Group?**

Royal Mail Group restrictions on trade appear anti-competitive; POL / SPM contracts must be far more flexible to allow post offices opportunities to compete in the marketplace. For example, only certain high street bank cards are accepted. Furthermore, there is a clear market opportunity to re-establish the equivalent of a national giro bank, a Postbank (as in mainland Europe) that could be founded upon the most-trusted Post Office brand at a time when

consumer confidence in private financial institutions is particularly low. Such services, alongside the existing financial services, should be better promoted.

2. How much account should be taken of:

a) costs to the taxpayer in providing services through the Post Office rather than through cheaper channels?

Cost and value are very distinct and separate entities. We believe that government and POL have seriously under-estimated the community / social value of network as a multi-faceted hub for individuals and businesses. Given the freedom to compete and the introduction / re-instatement of services, the current level of government subsidy stands to become increasingly less necessary; moreover, that current level of subsidy pales close to insignificance in the light of recent government intervention in the UK's banking system.

b) consumer preference for alternative channels?

At present and in some instances, the removal of a range of previously offered post office services has resulted not necessarily in consumers indicating a "preference" but rather consumers exercising choice from a range of diminishing options. Furthermore, government should not under-estimate the requirements of those individuals for whom "alternative channels" are not an option - the vulnerable, the elderly, the immobile, and those who are generally disadvantaged.

3. To what extent would the desire for the presence of a Post Office or post office services translate into actual use of those services?

More and extended services (as above) provide more reasons for patrons to visit the local outlet. The Post Office is a much-trusted brand; current loss of confidence in private financial institutions present government and POL with an excellent opportunity to react positively to unsteady market conditions.

4. What are the impacts of the availability of post office facilities for businesses and local residents and, in particular, how significant is the network in aiding social and financial inclusion?

The Post Office is a trusted national institution with greater coverage than any other single financial operator, despite the most recent closure programme. The impacts of availability are entirely positive, not least in the rural areas, as part of the social fabric of our communities, as provider of essential services often alongside a single, critical, convenience retail outlet. Diminution of coverage is entirely negative, requiring individuals and businesses to travel further to access comparable services; this runs contrary to current government thinking on the need for sustainable communities.

5. What level of subsidy (if any) per Post Office would be reasonable in the long term – for example, should it be £20,000 or £200,000?

If the suggestions above, not least the incentive to allow free competition, are adopted – then the need for subsidy is likely to diminish. Similarly, extended services

offered universally would provide an improved opportunity for sub-postmasters to generate more sustainable businesses. However, POL should adopt a policy of enabling that transition with greater contract flexibility and more equitable remuneration arrangements. If subsidies at some level remain necessary, sufficient justification should be found in the broader socio-economic function provided by post offices in generating genuinely sustainable communities. Should all post offices automatically receive full business rate relief?

In the light of the above comments, we would urge government not to permit any further post office closure programmes.

It may also be the case that POL and Royal Mail should be re-amalgamated and that the conclusions in the Hooper report rejected. There appears to be independent support, albeit indirectly, in the very current Matthew Taylor report that is based upon the concepts of sustainability and social cohesion of which the post office is an undeniable contributor.

Part 4: Assessment by the Selector

SCA proposals will be assessed by the LGA as Selector. This will include consideration, short listing and negotiation with the Secretary of State via the LGA Selector panel made up of councillors from the four parties represented on the LGA

The LGA Selector Panel is committed to undertaking the role in a transparent manner; as such reasons for decisions on proposals will be made available.

There will be no appeals process in relation to decisions of the Selector Panel.

4.1 Do you confirm your agreement to abide by the outcome of the Selector's assessment and decision-making processes?

Yes, South Hams District Council confirms to abide by the outcome of the Selector's assessment and decision-making processes.

4.2 Would your council, accompanied by the originators of the proposal, wish to make a short verbal presentation to the Selector Panel, should this opportunity be available?

Yes, if required.

Thank you for completing this form.

Please email it to selector@lga.gov.uk by 31 July 2009.