

**TONBRIDGE & MALLING BOROUGH COUNCIL**  
**FINANCE and PROPERTY ADVISORY BOARD**

**9 January 2013**

**Report of Central Services Director**

**Part 1- Public**

**Matters for Recommendation to Cabinet - Key Decision**

**1 REVIEW OF FEES FOR STREET NAMING & NUMBERING SERVICES**

**1.1 Street Naming & Numbering : Introduction**

- 1.1.1 The requirement to provide a Street Naming & Numbering service is derived from the Towns Improvement Clauses Act 1847, the Public Health Acts Amendment Act 1907 and the County of Kent Act 1981. The TMBC Street Naming & Numbering Policy sets out the framework under which the service is delivered in this authority.
- 1.1.2 For the past year, the Street Naming & Numbering (SNN) function has been delivered by a temporary project officer owing to the retirement of the previous SNN officer. During that time, the function has been under review and a number of automated systems have been put in place to help provide the service in a more efficient manner. However, it remains the case that SNN cases can take a very considerable resource to resolve. During the review it has become clear that whilst some fees levied are reasonable, given the work undertaken, others could be revised to account for the workload involved.
- 1.1.3 The previous fee schedule has been in place, with only minor amendments, for a number of years. Given the recent opportunity to reconsider the service delivery as a whole, I propose to make changes to the fee structure. In so doing, I have identified the following priorities:
- 1) There should be no overall reduction in income to the Council through the SNN function;
  - 2) The cost of SNN to the Council should, where possible, be recovered through fees and charges (noting that this is not always possible, and not always desirable);
  - 3) Ensure there are no 'perverse incentives' to apply for alternative naming schemes to minimise costs;
  - 4) Greater clarity should be introduced into the fee schedule to avoid confusion and the need for officer discretion in charging fees; and

- 5) Where workloads are sufficient to justify such, additional new fees should be considered.

1.1.4 In reviewing the fees and charges levied by TMBC, I have considered the equivalent charges across Kent and Medway. It is worth noting that at least two authorities (Dartford and Thanet) do not charge for their SNN service; Canterbury is considering introducing fees from April 2013.

1.1.5 To provide some context, I have set out the major steps involved in each of the main types of SNN. This is to provide Members with a level of understanding of the work involved. The current scale of Fees in Tonbridge & Malling is set out in **Annex 1**, with the proposed scale in **Annex 2**.

## 1.2 SNN : New properties

1.2.1 The naming of new properties falls into two categories – in-fill addresses, and new developments.

1.2.2 In-fill addresses are those where a small number of new properties are to be added to an existing street. Upon receipt of a formal application and appropriate fee, the SNN Officer must liaise with internal colleagues, Royal Mail and the developer in producing a draft numbering/naming scheme. In streets with an existing numbering scheme, the new property must be allocated a number; however where no numbering scheme is in place, the developer may choose a property name. Although only providing a small number of addresses, this can take a substantial resource to ensure no duplication of numbers or, more particularly, property names.

1.2.3 It remains true that TMBC charge substantially more to provide a new address for a single property than any other authority in Kent. Our existing charge, of £165, compares with £105 in the next nearest authority (Shepway), and an average of £66 across Kent and Medway. I am not minded, therefore, to recommend an increase in this charge. However, the current fee schedule does not specify whether this fee is payable for each new in-fill property within a development, or for the development as a whole. Where the development is relatively small and the SNN service straightforward, Officer discretion has been applied to levy only one fee of £165. For more complex cases, the fee is levied per property. However, this level of discretion can cause difficulties and I therefore recommend a more efficient model:

- 1) Fee for addressing one new in-fill property: £165. *Currently £165*
- 2) Fee for addressing two to three in-fill properties: £85 per property. *Not currently specified.*
- 3) Where four or more properties are to be named or numbered, the fee for new developments (below) will be levied. *Not currently specified.*

- 1.2.4 Larger new developments require considerable work to ensure they are named and numbered correctly and in compliance with the Policy. Often a new street is also required, the fee for which is included in the SNN fee. Where a new street is named, the SNN Officer must also consult with local members, the parish council and the developer in addition to Royal Mail, which increases the time taken and the cost of the service.
- 1.2.5 Across Kent, I have noted that some authorities charge a separate fee for creating a new street in addition to charging for the individual property addresses. However, there is sometimes discretion on the part of the developer and/or this authority as to whether to create a new street or add a spur from an existing street; the latter is often less desirable for the overall numbering scheme. To apply a separate charge for the naming of a street in addition to new properties would create a perverse incentive, and I therefore do not recommend this approach.
- 1.2.6 In the majority of cases, a new street is only named in relation to a new development. However, for the avoidance of doubt, I recommend an additional line in the fee schedule as set out below. This is higher than the charges, where applied separately, of other authorities (which are typically £100 to £150). However, it is important to ensure the cost of a new street named separately, plus the cost of a new in-fill property on that street, is not less than the fee for naming both at the same time as otherwise an incentive to do so would cause complications and additional work for the SNN Officer.
- 1.2.7 The fee structure for addressing properties is the area with most diversity across Kent. At present, TMBC charge £320 for up to 30 plots; Ashford charge a sliding scale to £35 per plot above 20 plots; Tunbridge Wells charge a fixed fee per property addressed. As a result, it is not simple to compare the fees across Kent. However, the table below sets out some examples for a few authorities:

Scenario	Fees (using current schedules)				
	TMBC	T/Wells	Sevenoaks	Maidstone	Ashford
New street, one property	£320	£175	£100	£175	£145
New street, five properties	£320	£275	£200	£300	£290
New street, 35 properties	£475	£1,025	£475	£1,500	£1,325
New street, 100 properties	£635	£2,650	£1,600	£4,100	£3,600

- 1.2.8 On larger-scale developments, the fee for Street Naming and Numbering in Tonbridge & Malling is one of the lowest across Kent. These larger developments require additional resources to properly devise and apply an SNN scheme, so there is justification for increasing the fee on a revised scale. It is important to note, however, that it is not realistic in any case to quantify the number of hours

work required to deliver the SNN service; this is because two near-identical applications can raise very different issues, so taking different resources to resolve.

1.2.9 I recommend the following fee structure for new developments of 4 or more in-fill properties, and for developments requiring new streets:

- 1) Fee for naming of a street, other than in relation to new property addressing: £200. *Not currently specified.*
- 2) Fee for addressing plots, including street naming if required:
 

1-4 units	£200 + £30 per unit <i>Current scheme shown in Annex 1</i>
5-10 units	£200 + £25 per unit
11 or more units	£400 + £10 per unit
- 3) A development is considered to be separate if they are received on separate applications and/or they do not share a common road which is also being named for the first time as part of the application. *This clarification is a new proposal.*
- 4) Individual flats are considered as individual plots. This is a new clarification, although this process has been applied thus far.

### 1.3 SNN : Existing properties

1.3.1 In addition to new developments, a significant proportion of the work undertaken within the SNN function is related to the renaming or renumbering of existing properties.

1.3.2 Tonbridge & Malling is to date the only authority in Kent that draws a distinction between services to residential and commercial customers, charging a premium to the latter. The majority of cases of renumbering or renaming a commercial premises are in respect of business moving to a new property to either commence trading or expand their business. The amount of work involved for a commercial property is broadly similar to that for a residential property, exercising similar processes. In many cases, naming and numbering of commercial properties has been done unofficially by businesses dealing direct with Royal Mail rather than through TMBC. Therefore, I recommend that the two charges be brought into line.

1.3.3 The current fee across Kent for renaming or renumbering an existing property, amongst those authorities that charge, ranges from £20 to £56.

- 1) Renumbering an existing property: £50
- 2) Renaming an existing property, not in a current numbering scheme: £50

- 1.3.4 The majority of streets within Tonbridge & Malling have a formal numbering scheme, and all new residential streets must adopt a numbering scheme. However, there remain some properties on some streets where there is no numbering scheme, and these properties are therefore named. These properties must keep their official name as part of their address, and changing the name is currently charged at the same rate as renumbering a property. I recommend (see paragraph 1.3.4 above) retaining this.
- 1.3.5 However, property owners are permitted to include a property name even if their property is numbered. The only condition is that they must retain the number as part of their address. In effect, this property name is superfluous and unnecessary, but is often used by residents and businesses in their address. TMBC do not currently charge for the service of adding or changing these 'alias' addresses, although the amount of work involved can be considerable as the SNN Officer must liaise with the property owner and Royal Mail to ensure the name is acceptable. Some authorities in Kent already charge for this service. I therefore recommend introducing a charge for this service, noting on our website and in our literature the restrictions and limitations of an alias address:
- 1) Registering the addition or change or an alias to a numbered property: £50
  - 2) Removing an existing alias from a numbered property: No charge
- 1.3.6 There have been rare occasions in the recent past where we have received a request to rename an existing street. We only consider such requests in extreme circumstances, as the disruption caused by such a change can be considerable for all residents and businesses on that street. In addition, a formal consultation must be carried out with local Members, Parish Councils, Royal Mail and the residents or businesses on the affected street. As a result, such a request can be a lengthy and expensive process. The current fee schedule is not clear on the fee charged for such requests. I therefore recommend a fee to reflect the amount of work involved, whilst deterring all but the most substantive requests, noting that this is a purposefully greater fee than that charged for a new street due to the increased work involved:
- 1) Rename an existing street: £1,500
- 1.3.7 Although none have been received in the recent past, there is the potential for owners of blocks of flats to wish to rename their property. This is undesirable, for the same reasons as renaming a street, in that many occupiers would be affected and there would be considerable disruption to them. In addition, the process followed by the SNN Officer would be similar to that of renaming a street. I therefore recommend the same fee for such an application:
- 1) Rename a block of flats: £1,500
- 1.3.8 A more common situation is where an existing property is split into two or more units, or two or more units are merged into a single property. Across Kent, a small

number of authorities already charge for making these changes, and their charges appear to be based on with the charge for addressing a new property. I therefore recommend a similar approach for Tonbridge & Malling:

- 1) Fee for addressing units (flats) when splitting an existing property: £85 per unit.
- 2) Fee for addressing a single property when merging separate units: £165

## 1.4 Additional services

1.4.1 Across Kent, a range of different services are offered alongside the core SNN processes. Most of these are not applicable to Tonbridge & Malling, as the fee structure above accounts for them.

1.4.2 The existing Fee schedule in Tonbridge & Malling includes provision for 'duplicate certificates'. Formal address registration certificates are no longer routinely produced, however, as a simple letter is now used instead. I therefore recommend that this fee is removed from the schedule. Where a confirmation is requested in respect of a recently-addressed property, the SNN Officer will produce and send a duplicate letter.

## 1.5 Summary

1.5.1 The table below sets out the current and proposed fee for a range of different scenarios.

Scenario	Current schedule	Proposed schedule
Existing street, one new property	£165	£165
Existing street, two new properties	£330	£170
New street, one property	£320	£230
New street, five properties	£320	£325
New street, 35 properties	£475	£750
New street, 100 properties	£635	£1,400
Renaming an existing street	£320	£1,500
Renaming / renumbering an existing property	£47	£50
Adding an alias to an existing numbered property	Nil	£50

1.5.2 In my opinion this proposed Fee Schedule, coupled with the current balance of cases received, meets the five principles identified in paragraph 1.1.3.

## 1.6 Legal Implications

1.6.1 The requirement to provide a Street Naming & Numbering service is derived from the Towns Improvement Clauses Act 1847, the Public Health Acts Amendment

Act 1907 and the County of Kent Act 1981. The TMBC Street Naming & Numbering Policy sets out the framework under which the service is delivered in this authority.

## **1.7 Financial and Value for Money Considerations**

1.7.1 The five principles identified in paragraph 1.1.3 include that there should be no overall reduction in income to the Council through the SNN function; and that the cost of SNN to the Council should, where possible, be recovered through fees and charges. In my opinion, the proposed Fee Schedule meets these principles.

## **1.8 Risk Assessment**

1.8.1 The five principles which underpin this review were designed to minimise risk to the Council.

## **1.9 Equality Impact Assessment**

1.9.1 See 'Screening for equality impacts' table at end of report. There are no equality impacts associated with the revised Fee Schedule for Street Naming and Numbering.

## **1.10 Recommendations**

1.10.1 In summary, I recommend that the following Fee schedule for Street Naming & Numbering be adopted from 1 April 2013:

- 1) Fee for addressing one new in-fill property: £165
- 2) Fee for addressing two to three in-fill properties: £85 per property.
- 3) Where four or more properties are to be named or numbered, the fee for new developments (below) will be levied.
- 4) Fee for naming of a street, other than in relation to new property addressing: £200.
- 5) Fee for addressing plots, including street naming if required:
 

1-4 units	£200 + £30 per unit
5-10 units	£200 + £25 per unit
11 or more units	£400 + £10 per unit
- 6) A development is considered to be separate if they are received on separate applications and/or they do not share a common road which is also being named for the first time as part of the application.
- 7) Individual flats are considered as individual plots.

- 8) Renumbering an existing property: £50
- 9) Renaming an existing property, not in a current numbering scheme: £50
- 10) Registering the addition or change or an alias to a numbered property: £50
- 11) Removing an existing alias from a numbered property: No charge
- 12) Rename an existing street: £1,500
- 13) Rename a block of flats: £1,500
- 14) Fee for addressing units (flats) when splitting an existing property: £85 per unit.
- 15) Fee for addressing a single property when merging separate units: £165

1.10.2 In addition, I recommend that the existing fee for providing duplicate certificates be removed, as this service is no longer available.

Background papers:

Nil

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Central Services Director

<b>Screening for equality impacts:</b>		
<b>Question</b>	<b>Answer</b>	<b>Explanation of impacts</b>
a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community?	No	The provision of street naming and numbering services will continue to be delivered to all applicants in a fair and equal way. Changing the fee structure better reflects the cost of providing the service, but does not adversely or positively affect any group in the community.



<b>Screening for equality impacts:</b>		
<b>Question</b>	<b>Answer</b>	<b>Explanation of impacts</b>
b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality?	No	
c. What steps are you taking to mitigate, reduce, avoid or minimise the impacts identified above?		

*In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above.*