

The law and best practice for the re-naming of streets and buildings

Street Naming and Numbering (SNN) officers and co-workers in District and Unitary councils in England and Wales may have received requests to change existing building and/or street names. This document presents a range of considerations, observations, legal definitions and procedures, annexes, and references to various sources that may assist SNN officers in responding to these types of requests.



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About GeoPlace

GeoPlace® LLP is owned equally by the Local Government Association (LGA) and Ordnance Survey (OS).

Our work involves balancing those stakeholders' needs for a common purpose: maintaining the definitive addressing databases for Great Britain, Northern Ireland, the Isle of Man and the Channel Islands.

Through the Data Co-operation Agreement (DCA), a legally binding agreement that underpins the creation and maintenance of GeoPlace address and street databases, we support the teams in every local authority in England and Wales who create that data. We then maintain and deliver the information as national datasets either through OS or directly to our statutory partners.

Every local authority has a Street Naming and Numbering Officer (SNN) function. The SNN Officer is responsible for the naming and numbering of new and existing streets and the numbering of properties within that area. Working closely with representatives from local authorities, we provide technical guidance to councils on the collection of street and address information and support the work of the SNN Practice Working Group who were consulted in the creation of this guidance.

The DCA highlights the importance of location data, and emphasises the value of having a framework that lets the whole public sector have access to authoritative address and street spatial information. It also recognises the role of councils in the creation and source of this particular spatial information.

GeoPlace is recognised world-wide as an established expert in managing addressing data and its associated infrastructure. We do this to a standard and in a way that can inspire innovation and transform people's lives on a national scale.

Disclaimer and Legal Advice

GeoPlace LLP engaged the services of Anthony Collins Solicitors LLP¹ to review this document.

Every effort has been made to ensure the accuracy of legal analysis in these materials but advice should be taken before action is implemented or refrained from in specific cases that include any of the recommendations set out in this document. No responsibility is accepted by GeoPlace LLP or Anthony Collins Solicitors LLP for action taken or refrained from by reference to the contents of these materials.

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¹ Founded in 1973, Anthony Collins Solicitors is a Corporate Partner of Lawyers in Local Government. Our local government team is led by Matthew Gregson and comprises of lawyers who have spent their careers working for and within local government. Our experience and expertise means that we are able to act as a trusted adviser to officers, elected members and those organisations that work with local government over the range of matters that they are considering or acting upon.

Introduction and Commentary

Pressure is increasing to reconsider some names that were, for various reasons, once given to streets, buildings, and monuments. This dialogue extends to discussing the locations for some of those monuments, too. Councils and their Street Naming and Numbering (SNN) officers and co-workers play an important role in enabling these conversations and in effecting changes that are requested as a consequence. As the Local Government Association (LGA) says (see **Annex F**):

"Building cohesive communities lies at the core of councils' day-to-day business and as leaders of place, shaping and supporting a local identity and helping to develop relationships and engagement between different parts of the local community are key to achieving this."

The LGA provides guidance for councils in **Annex F** and other material identified therein. This document does not focus on policy implications, but it will help SNN officers to identify what their authorities may do, legally, and how to go about exercising their functions in this regard.

Commentary

This document focusses on the law and practice around the re-naming of streets and buildings. Another aspect of the current dialogue is around monuments, their names and their location. This aspect is not discussed in detail.

Governance - Legislative Schemes and Decision Making

The law on SNN in England and Wales is complex. There are several legislative schemes in force, which are identified in **Annex D**. It is important to check which scheme applies to the authority:

- in London there is only one scheme in force;
- outside London, there is a national (England and Wales) scheme for numbering (but not naming) buildings, and a variety of schemes for naming and re-naming streets. The picture is further complicated by Local Acts that may apply instead of one of national schemes; and
- the Levelling-Up and Regeneration Act 2023 has introduced revised rules where a street, in England, is to be renamed.

Outside London, and where a Local Act does not apply, councils should have formally adopted the legislative schemes they will use pursuant to the requirements of the Local Government Act 1972. A key document to find is the resolution by the authority for adopting a particular legislative scheme. See para 4. **Annex D** for details of the potential combinations of schemes.

Once the authority is clear on which legislative scheme applies, all decisions must be made in accordance with the council's constitution, including the scheme of delegation. In this regard, the responsibility for decision-making within the authority will depend principally on two things:

- 1 Whether or not the authority operates under Executive arrangements. If it does, then the Executive will have SNN responsibility; and
- 2 What the scheme of delegation provides for. Can officers make all of the decisions on their own, for example, and even if they can, should those decisions be made by elected members instead? Are there conditions attached, such as formal consultation with elected members?

Some legislative schemes did not stipulate any form of consultation or engagement. The 1907 Act, for example, requires a two thirds majority in a local referendum to change a street name. Other Acts referred to just giving notice of an intended change. The 2023 Act has now altered this in England. More commentary on consultation is set out in [Annex C](#).

An authority may already have an SNN policy which takes the full extent of applicable legislation into consideration. However, due to the increasing focus on historic building and street names, it is worth considering a focussed review of that policy (see Example 2 in [Annex A](#)).

Irrespective, all decisions must be documented in accordance with the relevant regulations. More detail is included in the [Process Stages](#) section of this document, and in [Annex B](#).

Monuments

In a small number of cases, the authority has a role in defining the name of a monument because that monument is classified as a building and therefore falls within SNN legislation (see [Annex D](#) for a definition of what constitutes a building). This may mean that the authority has a role in setting the name of a monument, that is a building, but this will not generally be the case under the SNN legislation because the legislative schemes only provide a function to number and not to name buildings (the exceptions are some Local Acts and the legislative scheme applying in London).

However, for the most part, discussions about monuments may well focus more on their location and these discussions (and any actions that a council may take) fall outside of the SNN legislative schemes. Relevant factors might include (but not be limited to) ownership of the land and / or the monument, the history as to how the monument came to be where it is (both factual and legal), how any change to the monument will be treated under planning law, and whether the monument has been given listed building status either as part of a wider building or on its own.

Process Stages

This section is under revision and will be released in early 2026.

Annex A

Best practice documents

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Example 1

SNN web page guidance documents

Individuals and developers must not allocate house numbers, building or street names. Street naming and numbering is a statutory function of a council that applies to all property numbers or names and street/road name allocations, whether properties are new developments or not.

Every council (with SNN functions) should have a dedicated SNN page on its website. The SNN webpage should feature the above statement and provide a clear, unambiguous explanation of the SNN service. Information about the SNN service can be on the same page, or provided through downloadable guidance documents.

This is an outline of the information recommended for inclusion in both cases:

1 What is SNN?

- Explain that, while postcodes and post towns are allocated by Royal Mail, the council has a statutory function to allocate property numbers or names and street/road names to new developments and property conversions.
- Cite relevant legislation and refer to having a local SNN policy.
- Emphasise that no other organisation (such as Land Registry) has the legislative powers to create or allocate property numbers/names or street/road names.

2 What does the SNN service do?

- Explain that a definitive national address database verifies the existence of addresses. This makes it easier to send mail, goods, and services with confidence, and to check on identities and prevent fraud (credit applications and shopping online are useful examples, as are references to emergency services).
- Refer to any local challenges that will help illustrate the complexities of this task, such as handling street names in rural areas.
- This means the correct allocation of property numbers or names and street/road names is very important.
- SNN data is compiled locally, with unique identifiers and then sent to GeoPlace® to update the definitive national address database, so that all physical addresses are recorded accurately.

3 How are SNNs created?

- Explain that agreed national standards [BS7666] and a set of Data Entry Conventions provide explicit directions on street naming and numbering.
- Refer to any localised, additional council policies for property numbers/names and street/road names that influence what will be allowed and what won't be allowed.
- Briefly set out whether or not the Council obtains the postcode and post town on an applicant's behalf in new developments, and which official documents are issued on allocation of new property numbers or names and street/road names.
- Describe the obligation on owners/occupiers to display the allocated number/name on a property - use emergency service needs as an example to highlight the importance.
- Refer briefly to activation: how new addresses move from the Royal Mail's Not Yet Built file to the Postcode Address File (PAF®), and provide a link to check postcodes.
- Include a short reference to street nameplate obligations and specifications. See Appendix E, GeoPlace DEC-Addresses v3.4.

4 How to apply for street names / building numbers

- Recognise that owners/tenants may apply for various reasons. Specify who should apply and when, and whether or not requests by tenants will be considered.
- Direct customers to the appropriate Planning/Building Control Approval, or to an appropriate reference if alternative layouts are being considered.
- Highlight the importance of including relevant planning application numbers or appropriate plans, if preferred, in every application.
- If possible, link directly to the appropriate application forms or provide clear guidance on how to find them. Describe the preferred method of submission and confirmation.
- Explain any fees payable for the service, what the fees are for, how the fees are to be paid and what the arrangements are for invoicing.

5 Understanding the application timeline

- Give an indication of the time it may take to process a SNN request.
- Explain that there are different timescales for new street names and new addresses on an existing street/road.
- Indicate that Royal Mail may have a different timeline for the allocation of postcodes to SNN
- information, and that that timeline is outside the control of the council.

Example 2

SNN policy structure

Contents

- 1 Purpose of Policy
- 2 Reasons for Street Naming and Property Numbering
- 3 The Street Naming Legislation
- 4 Scheme of Delegation
- 5 The Legislation
- 6 Consultation and Notification of postcodes and postal addresses
- 7 Naming of new streets
- 8 Choice of street names
- 9 Numbering sequence
- 10 Re-numbering existing properties / buildings or Re-naming a street
- 11 Allocation of house numbers to properties with house names
- 12 Changing an existing house name to properties with no house number
- 13 Add house name/ change an existing house name with a house
- 14 Charging
- 15 Claims for compensation
- 16 Decision and Discretion
- 17 Reference
- 18 The Council is not responsible for
- 19 Street name plates

Glossary

Appendix A – Legislation

Appendix B – Frequently Asked Questions

Appendix C – Notice Templates

Appendix D – Examples of Numbering

Example 3

SNN application documents

Clear and simple forms for an SNN application let developers and owners register their properties as early as possible. This enables the council to allocate the formal address more efficiently, in line with SNN legislation and policy, and provide the address that will be used officially by all systems.

Suggested fields for an application form should include, but not limited to:

- **Contact**
Developer/owner/applicant contact name.
- **Address**
Of the above.
- **E-mail**
Contact e-mail address.
- **Telephone**
Contact number.
- **Type of application**
New street/road name and numbering/infill development.
- **Type of development**
Is it a new build or a conversion of an existing property.
- **Location of development**
Descriptive name of location of development.
- **Location/Layout Plan**
Plan should include reference to the location of an existing street.
- **Planning/Building Control reference number**
The planning/building control number that approved the reference.
- **Suggested name**
If the developer/applicant has a suggestion for the name(s) of the streets these should be included here.

A guidance note should be included that explains the council's SNN process, the length of time it's likely to take and the contact details for the relevant person/department (see Example 1 – SNN web page guidance document).

It is recommended that design and build plans are downloaded separately, using the relevant planning application number. This will reduce the size of application e-mails. However, if this causes administrative problems then the type and format of those plans should be specified clearly.

Example 4

SNN decision document

1 New, amended or renamed street names or the allocation of new property numbers/names or numbering/renaming existing properties

Street naming is a statutory function. All councils must have a policy for approving and recording decisions about street names. Actions should be undertaken in line with the council's constitution and may require a council committee or cabinet to formally approve all street name decisions.

The allocation of new property numbers or names and renumbering or renaming existing properties is also a statutory function. All councils must have a policy for approving and recording all allocations, but this may exist as a separate item to the policy covering street names.

To speed up the approval process, a council may choose, in accordance with the council's constitution, to delegate street naming decisions from a committee or cabinet to an individual officer of the council. This officer is normally a Director, Head of Service or a function who reports to that committee or cabinet. An SNN officer normally takes responsibility for this work on behalf of that person or could be specifically delegated to do so by the delegated Director, Head of Service or a function.

Whatever approval process a council adopts, all street name decisions must be recorded and kept in line with the council's document retention policies, see Example 9. In addition to the recommendations in this document, all decision-making records must contain the content required by the relevant access-to-information legislation.

It is recommended that street name decision documents should detail the following:

- **Document Title** - Record of decision taken by [.....] Committee, Cabinet or Director of [.....].
- **Matter** - New street names or renaming an existing street.
- **Type and location** - Residential development at [Green Lane Hightown].
- **Development name** - If applicable the any colloquial names used by the developer in marketing.
- **Proposed street names** - list all new street names.
- **Reason for street names** - background and justification or provenance as to why these street names have been chosen, which should reflect the council's policies on the allocation of new street names (see **Annex E**).
- **Plan of new street names or renaming an existing street** - plan should clearly show extent of new streets, be marked up with any new street names and show the existing surrounding areas for clarity of location.

It is recommended that new property numbers/ names or numbering/renaming decision documents should detail the following:

- **Plot to postal** - a table or list of the developers' plot numbers and the allocated property numbers or name and the corresponding street name. This should include internal numbering allocations for apartment blocks when appropriate.
- **Plan of plot to postal** - the plan should clearly show extent of the development, be marked with plot numbers, property numbers and street names and show the existing surrounding areas for clarity of location. If numbering internal properties, then plot to postal floor plans should be included.
- **Decision** - details of who has been consulted, including consultation period and the outcome of that consultation. Detail the decision on the agreed new street names.
- **Date decision taken** - date the decision was made on the new street names.
- **File/document reference number** - include the unique SNN file reference for the case. It is good practice is to include the relevant planning application number that granted approval for the development, as a separate reference.

- **Place of inspection** - details about where this document will be held for future inspection. This may be a physical copy in a council office or a web link to an electronic copy.
- **Signature, name and date of approving officer signature** - the name of the council officer authorised to approve street names, either the Director, Head of Service or a function or SNN officer and date the form was completed. This date can be after the decision date above.
- The document may also detail the following:
 - **Developer** - [xxx Homes].
 - Permitted Development
 - **Financial implications** - details of any financial implications incurred by the council in approving the new street names. Normally there won't be any, but costs may be incurred in replacing street nameplates for example.
 - **Policy implications** - will approving the street names conflict with any council policies.
 - **Staffing implications** - will approving the street names cause any staffing issues.

2 Allocation of new property numbers/names or numbering/renaming existing properties

Allocating new property numbers or names and renumbering or renaming existing properties is a statutory function. All councils must have a policy for approving and recording all allocations. The policy to approve property numbering or naming may be a separate item to the policy covering street names. To speed up the allocation process a council may delegate property numbering or naming to an individual officer of the council, this could be the SNN officer or alternatively to the Director, Head of Service or a function.

Whatever approval process a council adopts, all decisions must be recorded and kept in line with the council's document retention policies, see Example 9. In addition to the recommendations in this document, all decision-making records must contain the content required by the relevant access-to-information legislation.

It is recommended that the decision document should detail the following:

- **Document Title** - Street Naming and Numbering.
- **Matter** - Postal numbering, renumbering or renaming.
- **Type and location** - New residential development at [Green Lane Hightown] or conversion to create new residential property, or renaming existing commercial property etc.
- **Developer** - [xxx Homes].
- **Development name** - any colloquial names used by the developer in marketing.
- **Plot to postal** - a table or list of the developers' plot numbers and the allocated property numbers or name and the corresponding street name. This should include internal numbering allocations for apartment blocks when appropriate.
- **Plan of plot to postal** - the plan should clearly show extent of the development, be marked with plot numbers, property numbers and street names and show the existing surrounding areas for clarity of location. If numbering internal properties, then plot to postal floor plans should be included.
- **File/document reference number** - include the unique SNN file reference for the case. It is good practice is to include the relevant planning application number that granted approval for the development, as a separate reference.
- **Place of inspection** - details about where this document will be held for future inspection. This may be a physical copy in a council office or a web link to an electronic copy.
- **Signature, name and date of approving officer signature** - the name of the council officer authorised to approve street names, either the Director, Head of Service or a function or SNN officer and date the form was completed. This date can be after the decision date above.

Example 5

Scheme of Delegation – Record of Decision

Delegated Powers for:

- Section 64 Towns Improvement Clauses Act 1847
- Local Government Act 2003 (charges re-numbering properties and naming or renaming streets)
- Section 17 -19 Public Health Act 1925 (naming or renaming streets)
- or local act.

SCHEME OF DELEGATION TO THE HEAD OF [council function]

DECISION No. xx/xx

Date: XXXXXX

Section 17-19 Public Health Act 1925 [or local act] — renaming of streets

In accordance with this delegation,
I authorise the following action:

WARD: [name]

- A project to introduce [name] etc. street was (developed etc).
- This decision is required so that street naming may be (rationalised etc).
- This will enable Orders to enforce the [name] project to etc.
- Ward Councillors have been consulted with respect to the [name] scheme and no objections were received.
- The full business case and risk assessment was agreed by the Director of [name] under the Scheme of Delegation on the [date].

Financial implications

- Costs of the renaming and replacement street name plates will be met within the project costs for the [name].

Consultations

Councillors have been consulted and all support the [name] scheme.

Signed:

..... Head of [council function]

Date:

Agreed by:

Signed:

Date:

Contact Officer:

Decision Template

[Name of council] Council

DECISION OF DIRECTOR OF XXXXXXXXXXXXXXXX

DECISION No. xx/xx

Date: xxxxxx

SUBJECT:

Background:

Key Decision: Yes/No

DECISION:

Reasons:

Other Alternatives Considered:

Consultation:

Conflicts of Interest:

Risk Assessment:

Financial Implications:

Implications for Future Years:

Signed Head of [council function].

Dated

Example 6

Building number notice/ Street name notice of intention

Notice

Instructions for the occupier to mark the property with a number or to have the number/mark renewed.

[name of council] Council

TOWNS IMPROVEMENT CLAUSES ACT 1847 (or local act)

To *(name)* the occupier of the property and premises in the street known as *(name)* Street within the administrative area of *[name of council]* Council.

[name of council] Council gives you notice that you must [mark the *(house or other building)* in *(name)* Street of which you are the occupier, or to cause it to be marked, with the [new/existing] number *(specify)* [by having such number legibly painted in [a] figure[s] not less than *(specify)* mm in height [upon *(or)* over] the *(front door)* of the *(house or other building)*] *(or)* to renew the number *(specify)* with which your *(house or other building)* has been marked, but which has become *(obscured, obliterated or defaced)*, by having it repainted in legible figures not less than *(specify)* mm in height].

If you fail within *[X days]* after the service of this notice upon you [to mark or have your *(house or other building)* marked as above required *(or)* to renew the number with which your *(house or other building)* has been marked as above required] you will be liable to a penalty not exceeding level¹ [1 (£200) or 2 (£500)] on the standard scale, and the council will cause the number [to be marked upon your *(house or other building)* as above *(or)* to be renewed as above] and the expense will be repayable by you to the council and will be recoverable as damages.

Signed *(signature of proper officer)*

Dated

Note: Fines under the 1847 Act (First Scheme), 1907 Act and the 1925 Act are set at Level 1. The offences under the 1925 Act also have a maximum daily rate of £1. In London the offences attract a fine at Level 2. These are not fixed penalty notice provisions and so enforcement would be through the Magistrates' Court.

¹ Section 37, Criminal Justice Act 1982 and Section 85, Legal Aid, Sentencing and Punishment of Offenders Act 2012 or Section 148(2)(viii) – offences under Sections 10 and 13.

Street Name proposal Notice

Letter to be sent to requestor proposing street names

[name of council] Council

PUBLIC HEALTH ACT 1925 SECTION 17 (or local act)

PROPOSAL TO NAME STREETS

We [requestors name] give notice that we propose to name the street[s] shown, and edged in red, on the attached plan [name of street].

Signed:

Dated:

Head of [council function].

Notice of intention to order naming of streets

Notice of intention to make an order naming streets
under the Public Health Act 1925 Section 18 [*or local act*]
(display Notice on site)

[*Name of council*] Council

PUBLIC HEALTH ACT 1925 SECTION 18 (*or local act*)

NAMING OF STREETS

NOTICE is given that [*name of council*], pursuant to the Public Health Act 1925 Section 18, intends to make an order assigning names to the streets or parts of the streets set out in the schedule below, and which are shown on a map available for inspection [*council website link, if available*] or during the usual office hours at the offices of the council at [address] and notice is further given that such order will be made on or after [date]

Any person aggrieved by the intended order may within 21 days after the date of this notice appeal to the Magistrates Court, [address] against such order.

SCHEDULE

PRESENT NAME OR DESCRIPTION AND SITUATION, OF (PART OF) STREET	PROPOSED NAME

Dated this day 20

Signed:

Head of [council function].

Example 7

Street name objection notice

Notice of objection to street name proposal by Local Authority
(to be sent within one month of receiving notification)

[council name] COUNCIL

PUBLIC HEALTH ACT 1925 SECTION 17 (or local act)

OBJECTION TO THE NAME OF A STREET

To [requestor] of [address]

[name of council] Council gives you notice that it objects to the name of (name) Street proposed by you in a notice to the council dated (date).

If you so desire you may appeal against this objection to [name] the Magistrates Court, [address] against such order within 21 days after the service of this notice upon you.

Signed (signature of proper officer)

Dated

Example 8

Street name change order notice

[*council name*] COUNCIL

PUBLIC HEALTH ACT 1925 - SECTION 18 (or local act)

ALTERATION OF THE NAME OF A STREET

NOTICE IS HEREBY GIVEN THAT IN PURSUANCE OF SECTION 18 OF THE PUBLIC HEALTH ACT 1925, [*council name*] COUNCIL INTEND BY ORDER TO ALTER THE NAME OF [*name*] STREET AS SHOWN HATCHED ON THE ATTACHED PLAN

FROM: [*name*] STREET

TO: [*name*] STREET

SUCH ORDER MAY BE MADE BY THE COUNCIL ON OR AT ANY TIME AFTER

THE [*day*] DAY OF [*Month*] 20

ANY PERSONS AGGRIEVED BY THE INTENDED ORDER MAY WITHIN TWENTY ONE DAYS AFTER THE POSTING OF THIS NOTICE APPEAL TO THE MAGISTRATES COURT BY MAKING COMPLAINT TO THE [*address of court*]

DATED THIS [*day*] DAY OF [*Month*] 20

Signed:

HEAD OF [*council function*]

[council name] COUNCIL

PUBLIC HEALTH ACT 1925 - SECTION 18

RENAMING OF PART OF [name] STREET TO [name] STREET

Whereas [council name] Council (hereinafter referred to as "the Council") has caused this Order to be posted in accordance with the provisions in the Public Health Act 1925 and there has been no appeal against the intended Order by any person aggrieved.

NOW THEREFORE the Council Orders as follows:-

To re-name the southern section of [name] shown edged and hatched black on the plan attached to this Order to become [name]

Dated this day of 20

THE COMMON SEAL of [council name] COUNCIL was hereunto affixed to this deed in the presence of:

Authorised Signatory

[name of council] Council

PUBLIC HEALTH ACT 1925 - SECTION 18 (or local act)

STREET NAME ORDER

- [name of council] Council ('the Council') is the council for the purposes of Section 18 of the Public Health Act 1925 ('the Act') for [area] in which the streets or parts of streets specified in the schedule below are situated.
- The Council has given public notice in accordance with the Act of its intention to make an order assigning names to the streets as set out in the schedule below.
- [No appeal to the magistrates' court against the intended order has been made within the prescribed time (or) The [appeal (or) appeals] to the magistrates' court against the intended order have been [withdrawn (or) dismissed]]

NOW therefore the Council in pursuance of the powers conferred on it by the Section 18 of the Act orders that the streets shall have the names assigned to them as set out in the schedule below.

This order may be cited as "[name of council] Council (Street Names at) Order"

SCHEDULE

DESCRIPTION AND SITUATION OF STREET OR (PART OF) STREET	REFERENCE ON MAP	NAME OF STREET
<i>In the () Ward, approximately () metres long running in a () direction from the () and forming part of the () at its junction with ().</i>		

DATED this day of 20....

IN WITNESS whereof the Common Seal of [name of council] Council was hereunto affixed the day of in the year two thousand and in the presence of
Head of [council function]

Example 9

SNN retention policy

SNN retention policy

Councils should manage their SNN records and information effectively, keeping them organised and accessible for as long as they are needed but no longer. These retention guidelines are issued to support councils in the areas of Data Protection, General Data Protection Regulation (GDPR), Freedom of Information and the relevant access-to-information legislation.

Each council must ensure the actions shown in the guidelines are ratified internally within the council.

Recommended best practice

Function	Retention Action
Application for a new street name and to rename an existing street.	Destroy 6 years after last action.
Application for new property number or name and to renumber or rename an existing property.	Destroy 6 years after last action.
Official decision document and plan approving a new street name or approving a rename to an existing street.	Permanent.
Official decision document and plan approving a new property number or name and approving a renumber or rename to an existing property.	Permanent.
Request to Royal Mail for postcode allocation.	Destroy 6 years after last action.
Confirmation from Royal Mail of postcode allocation.	Destroy 6 years after last action.
New street name and renamed street allocation or distribution document.	Destroy 6 years after last action.
New property number or name and renumber or rename to an existing property allocation or distribution document.	Destroy 6 years after last action.
Working files relating to Street Naming and Numbering	Destroy 4 years after last action.

Annex B

Decision making

3

Decision making

Transparency in decision making

- 1 Local authorities operate either with executive arrangements or under a committee system.¹ Executive arrangements involve the local authority operating with either a leader and cabinet model or a directly elected mayor and cabinet model. The committee system involves the local authority authorising various committees of elected members to discharge its functions.
- 2 Under executive arrangements, the leader or the elected mayor and the individual cabinet members can make decisions on executive matters themselves depending upon the authority's Constitution. Under a committee model there is no individual decision making by elected members. Under both systems, decision making can be delegated to officers of the authority. Where a decision is made within the authority it will be determined in accordance with the authority's Constitution and the scheme of delegation. Even where authority is delegated to officers or (in the case of executive arrangements) to an individual elected member, decisions may still be referred upwards to committee/Full Council (in the case of a committee system) or Cabinet/a directly elected mayor/the Leader (executive arrangements).
- 3 Where executive arrangements are in place then the functions of the local authority are split into executive functions and non-executive functions with the former being the responsibility of the executive and the latter being the responsibility of the full council, as a whole. A non-executive function must be listed in Regulations (or elsewhere in legislation) as being the responsibility of the full council (or capable of being the responsibility of only the full council). If it is not, then by default a function is deemed to be an executive function.²
- 4 The functions relating to SNN are executive functions (note this summary is focussed on the applicable English legislation, for Welsh local authorities please check against the applicable legislation for those authorities).
- 5 This means that where a local authority that is operating executive arrangements makes an SNN decision then the Local Authorities (Executive Arrangements) (Meetings and Access

to Information) (England) Regulations 2012 (2012 Regulations) apply.³ See also the guidance issued in Open and accountable local government: plain English guide (<https://www.gov.uk/government/publications/open-and-accountable-local-government-plain-english-guide>); and:

- 5.1 If the SNN decision is taken by the executive or a committee of the executive or an area committee of the executive:
 - The meeting must be in public save where the public can be excluded from the meeting so that the meeting is held in private – where confidential information or exempt information would be disclosed (for which definitions see below) or to maintain orderly conduct or prevent misbehaviour;
 - The agenda and connected reports must be made available for inspection at the authority offices and on the authority, website save to the extent that the meeting will be held in private;
 - Where the decision would be a key decision in that the authority would incur/make significant expenditure/savings relative to its budget for SNN or would be significant in its effects on communities living or working in an area comprising two or more wards/electoral divisions then additional rules apply in respect of prior publication of information before the decision is made. The provisions on key decisions also apply to paragraphs 5.2 and 5.3 below;
 - As soon as practicable after the meeting a written statement detailing the decision, reasons, alternatives considered and rejected, conflicts of interest declared, and any dispensations granted must be produced;
- 5.2 If the SNN decision is made by an individual elected member (including a directly elected Mayor):
 - As soon as practicable after the member has made the decision a written statement must be produced detailing the decision,

¹ Section 9B, Local Government Act 2000

² See Section 9D, Local Government Act 2000 and the Local Authorities (Functions and Responsibilities) (England) Regulations 2000

³ For authorities in Wales see the Local Authorities (Executive Arrangements) (Decisions, Documents and Meetings) (Wales) Regulations 2001. The Regulations contain broadly similar provision but there are certain differences, for example as to what information needs to be recorded in decision making records.

reasons, alternatives considered and rejected, conflicts of interest declared, and any dispensations granted;

5.3 If the SNN decision is taken by an officer with delegated authority from the executive:

- The Officer must produce a written record of the decision containing the date, the decision taken, reasons, details of any alternatives considered and rejected and whether any elected member has declared a conflict of interest.⁴

6 Written records and background papers must be made available for inspection by the public as soon as reasonably practicable at the authority offices and on the authority website.⁵

7 Written records of decisions and reports (considered) that must be available for public inspection must be retained for six years and background papers for four years.⁶

8 Where a committee system in a local authority in England makes an SNN decision then Part VA (Sections 100A-100K), 1972 Act and The Openness of Local Government Bodies Regulations 2014 (2014 Regulations) apply (see also the guidance referred to at paragraph 5 above) and:

8.1 Where the SNN decision is made by full council or by a committee/sub-committee then:

- The meeting shall be open to the public unless the public is excluded, and the meeting held in private where confidential or exempt information may be disclosed;
- Copies of the agenda shall be open for inspection by the public together with copies of reports save to the extent the meeting will be held in private;
- After the meeting the minutes, any summary of a private part of the meeting, the agenda and any reports are open to inspection for six years. Background papers are available for up to four years;

8.2 Where the SNN decision is made by an officer exercising delegated authority then:

- The Officer must produce a written record of the decision containing the date, the decision taken, reasons, details of any alternatives considered and rejected and (not in all cases) whether any elected member has declared a conflict of interest.⁷
- That written record and background papers must be made available for inspection by the public as soon as reasonably practicable at the authority offices and on the authority website. Written records must be retained for six years and background papers for four years.⁸
- Publication of and access to information obligations do not apply where confidential information⁹ would be disclosed in breach of an obligation of confidence or where exempt information (as defined in Section 100I of and Schedule 12A to the 1972 Act) would be disclosed. Exempt information is:
 - Information relating to any individual;
 - Information which is likely to reveal the identity of an individual;
 - Information relating to the financial or business affairs of any particular person (including the authority holding that information) save where that information is required to be registered under (for example) the Companies Act 2006 or the Charities Act 2011 (amongst others) and where the information relates to a proposed development where the authority might grant itself planning permission;
 - Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority;
 - Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings;

⁷ Regulation 7, 2014 Regulations

⁸ Regulation 8, 2014 Regulations

⁹ Which is provided by a government department or where disclosure is otherwise prohibited by or under any enactment or Court order.

⁴ Regulations 13-15, 2012 Regulations

⁵ Regulations 14 and 15, 2012 Regulations

⁶ Regulation 21, 2012 Regulations

- Information which reveals that the authority proposes-
 - a** to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
 - b** to make an order or direction under any enactment; and
- Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

10 Information remains exempt only for so long as in all the circumstances the public interest in maintaining the exemption outweighs the public interest in disclosure and both tests must be satisfied to keep the information exempt.

11 It is considered difficult to identify a scenario where a SNN decision would involve exempt information save where there is detailed commercial information about a development included within the papers. For an example of an SNN decision document, see Example 5 in **Annex A**.

12 It should also be noted that whenever a local authority meeting is open to the public members of the public are able to report on that meeting including by filming and/or audio recording the meeting and taking photographs.¹⁰

13 As can be seen from the above, provided that any street naming/numbering decision does not contain confidential or exempt information a significant level of detail should be publicly available on decisions that have been (or may be made).

¹⁰ See Section 100A, 1972 Act and the 2012 Regulations, Regulation 4.

Annex C

Consultation



Consultation

1. The Legislative Frameworks currently refer to engagement as follows:
 - Section 21, 1907 Act - local referendum to be held (Wales only);
 - Section 18, 1925 Act - requirement to put up notices, although interestingly unlike the following sections below there is no reference to objections being sought/considered (only when naming a new street in England, naming of new streets and alterations in Wales);
 - Section 6, 1939 Act - requirement to put up or to use a circular and invite objections prior to altering/assigning a street name (in the case of alterations of existing street names then the 2023 Act requirements to demonstrate necessary support apply);
 - Section 11, 1933 Act - requirement to serve notice on owners and invite representations prior to substituting building name;
 - Section 13, Oxfordshire Act 1985 (as an example of a Local Act) - requirement to put up notices and serve notice on owners/occupiers prior to altering a street name and invite objections - however, note the 2023 Act now also governs the situation where a street is renamed; and
 - Section 81, Levelling Up and Regeneration Act 2023 (2023 Act) an alteration to an existing street name can only be made where the alteration has the necessary support, which is determined in accordance with the 2023 Act (England only).
2. A consultation obligation does not need to be expressly set out in statute¹ although if a legislative framework requires consultation for certain aspects and not for others that may re-but any suggestion that there should be consultation on the other decisions.
3. Where a consultation duty does not expressly arise an implied duty to consult may arise:
 - Where there is a promise to consult on a specific decision or certain types of decision;
 - Where the type of decision has been consulted on before;
- Where the decision will have a serious/severe impact on those affected/likely to be affected; or
- Where the decision will remove an existing benefit.
4. An implied consultation obligation is unlikely to arise in every situation but is something that officers should keep under review particularly when developing general policy or dealing with high profile/contentious decisions. In the event there is a consultation obligation - or a council decides to consult even when it does not have to - who should be consulted will be dependent upon the decision but we suggest at least those owners/occupiers affected by the decision. Note that in the case of the 2023 Act, regulations and/or guidance have not yet been published detailing how necessary support is to be demonstrated.
5. Any consultation must be adequate and fair having regard to all the circumstances and the courts² have set out some broad guiding principles on what this means:
 - Consultation must be undertaken when proposals are at a formative stage;
 - Sufficient reasons must be given to allow for intelligent consideration and response by consultees;
 - Adequate time must be given for consideration and response; and
 - Consultation responses must be conscientiously be taken into account before making the decision.
6. It is highly advisable to seek further input from the council's in-house legal team or other legal advisers when designing standard consultation approaches or the approach to a single consultation.

¹ Although it should be noted that there are general obligations that may require consultation in certain circumstances - e.g. Best Value Duty - Section 3, Local Government Act 1999; and the Public Sector Equality Duty - Section 149, Equality Act 2010.

² R v London Borough of Brent, ex parte Gunning [1985] LGR 168; endorsed by the Supreme Court in R(on the application of Moseley) v London Borough of Hackney [2014] UKSC 56

Annex D

Legislative Schemes, Streets and Buildings



Functions, Powers and Duties

1. Local authorities in England & Wales can only do what they are authorised by statute to do. To this end local authorities have a number of functions set out in various powers and duties. The distinction between the two is very important when considering what a local authority needs to do and whether it can charge for what it proposes to do.

- 1.1 A power authorises a local authority to do something, but the authority is not under an obligation to use the power. Typical statutory wording would be "*the local authority may*"; and
- 1.2 A duty requires a local authority to do something. The local authority does not have a choice. Typical statutory wording would be "*the local authority must*" and "*the local authority shall*".

The Legislative Schemes

2. Prior to the relevant provisions of the Local Government Act 1972 (**1972 Act**) coming into force (1 April 1974), the following legislative schemes were in force alongside each other (the description of the powers/duties relates to how the legislation is currently in force in 2025):

2.1 1847 Act and the 1875 Act - jointly the First Scheme:

- A duty to cause houses/buildings to be marked with such numbers as the authority thinks fit. Neither house or building are further defined and would likely be given a wide interpretation as a result;
- A duty to cause to be put up or painted the name by which a street is to be known; and
- Occupiers to mark properties with such numbers as the authority approves of and to renew the marking.

2.2 1907 Act (Wales only):

- A power to alter a street name following a local "referendum"; and
- A power to put up a street name sign/marking.

2.3 1925 Act:

- Allows notice of proposed street names to be given to the local authority and a power to the authority to object;
- A power to the local authority to assign a street a name or (in Wales only) alter an existing street name by order following notice by the local authority; and
- A duty on the local authority to paint/ mark the street name and renew it when it becomes illegible.

2.4 1939 Act - only applies in London (the inner and outer London Boroughs and the City of London):

- Allows notice of proposed street names to be given to the local authority and a power to the authority to object;
- A power to the local authority to assign a street, way, place, row of houses or block of buildings a name or alter (subject to the requirements of the 2023 Act) an existing name by order following notice by the local authority and consideration of objections. Where the power is exercised to alter an existing street name then this is subject to section 81 of the 2023 Act and the necessary support must be demonstrated;
- A duty to cause the name of the street, way, place, row of houses or block of buildings to be set up and kept set up; and
- A power to the local authority by order (following notice by the authority) to specify that any building (the term building is not further defined - but there are a limited number of specific exclusions set out in the legislation) in a street, way, place, row of houses, or block of buildings shall have a number or name or number and name and duty (where such an order is made) to give notice to the owner/occupier to mark the building in accordance with the designation given in the order. No preference is expressed in the legislation regarding whether a number or name or both should be specified.

2.5 2023 Act (England only)

- Power to a local authority (outside London) to alter the name of a street (or part of a street) by order if the alteration has the necessary support; and
- Power to that local authority to cause the altered name to be painted or marked.

2.6 Wherever the council is under a duty to put up or renew a street name plate then (as detailed further below) it cannot charge. The wording is often that the council "shall cause" which does conceivably leave open that it could ask a third party to put up and maintain the street name plate. It is not considered that the statutory wording allows the council to force a third party to put up the sign. Whether street signs would be swept up as a commercial term of a wider agreement, such as a section 106 agreement for planning purposes, is another matter.

Option 1	Option 2	Option 3	Option 4
Street Numbering: The First Scheme	Street Numbering: The First Scheme	Street Numbering: The First Scheme	Street Numbering: The First Scheme
Street Naming: 1907 Act 1925 Act (Sections 17 and 19 only)	Street Naming: The First Scheme 1907 Act	Street Naming: The First Scheme 1907 Act	Street Naming: 1925 Act (Sections 17 and 18 only)
Option 5	Option 6	Option 7	Option 8
Street Numbering: Local Act	Street Numbering: Local Act	Street Numbering: Local Act	Street Numbering: Local Act
Street Naming: 1907 Act 1925 Act (Sections 17 and 19 only)	Street Naming: The First Scheme 1925 Act (Sections 17 and 18 only)	Street Naming: Local Act	Street Naming: First Scheme 1907 Act

3. There is a significant element of cross over between the different schemes and as a result it is considered that the 1972 Act attempted to introduce order by effectively allowing local authorities to choose which scheme would apply.
4. In the case of London, the 1972 Act provides that only the 1939 Act (as now amended by the 2023 Act) will apply. In the rest of England & Wales, there are potentially the following combinations of functions:
 5. Schedule 14 of the 1972 Act extends the street numbering function under the First Scheme throughout England & Wales.¹
 6. Every local authority needs to be very clear about which option has been selected by the authority. In some cases, authorities have made a new decision where the previous choice of Option is unclear. Where such a resolution is to be made then there are specific notice requirements (paragraph 25, Schedule 14, Local Government Act 1972)
 7. Local Acts referred to often relate to local government re-organisations. Generally, these only appear to apply to street numbering, but a notable exception is the Oxfordshire Act 1985 which applies to both street numbering and street naming. Other Local Acts may well replicate the Oxfordshire position. Local Acts will usually disapply the national legislative schemes and may also express functions as powers rather than duties. There is no central register of Local Acts or central record of whether they remain in force. Note that the 2023 Act will still apply to street renaming.

The First Scheme and Property Naming

8. The First Scheme **does not** authorise the naming of properties as an alternative to numbering.
9. For those local authorities relying on the First Scheme, in respect of numbering properties, or a Local Act that only refers to numbering (and not naming), they could

potentially rely upon Section 111, Local Government Act 1972 to authorise naming a property on the basis that the naming is incidental to the numbering function under the First Scheme or the Local Act. They would still have to number the property in compliance with their duty under the First Scheme but could add a name in addition to the number. The situation is slightly different under a Local Act where numbering is often a power - however, for consistency it is advised that properties should still be numbered.

10. As section 111 is a power, authorities could use Section 93, Local Government 1972 to charge for the separate property naming application. Naming of a property through this route would not dislodge the numbering under the First Scheme which would remain the main official designation. Since some local authorities are making a charge for naming properties they should consider very carefully the implications of their actions because if an applicant is being asked to pay for a name then they would then logically expect, at least, the authority to use it officially - although this would have to be in addition to the number rather than in place of it."

The 1925 Act and Street Numbering

11. The case of *Agnew v Stockton on Tees Corporation [1968] CLY 1767* has been considered. It does not authorise the use of the functions under the 1925 Act to be used for number or naming buildings.

The definition of a "street", a "highway", and a "building"

12. In the table below, the definitions of "street", "highway" and "building" are examined.
13. It is important to note the term "street" is not limited to adopted or un-adopted Highway.

¹ See Paragraph 23 and Paragraph 24(a) - the latter only applies to street naming not street numbering.

Act	Definition of a Street and Commentary	Definition of a Highway and Commentary	Definition of a Building and Commentary
The First Scheme	There are separate definitions under the 1847 Act and the 1875 Act. It is considered that the 1875 Act definition applies: "Street" <i>includes any highway...and any public bridge, and any road lane footway square court alley or passage whether a thoroughfare or not</i>	The 1847 Act definition of "street" does not include the term "highway". It is considered that the 1875 Act definition of "street" applies, and this does include the term "highway". There is no statutory definition of "highway" under the 1875 Act. All parts of the 1875 Act dealing with highways were repealed by the Highways Act 1959, this Act was subsequently consolidated into the Highways Act 1980.	Required to number <i>"the houses and buildings in all or any of the streets"</i> . The terms house and building are not further defined under the 1847 Act. However, under the 1875 Act a definition of "house" is included - <i>"includes all schools, also factories and other buildings in which...persons are employed..."</i> This is not an exhaustive list and consequently the definition is very wide.
1907 Act	<i>It is considered that the 1875 Act definition applies: "Street" <i>includes any highway...and any public bridge, and any road lane footway square court alley or passage whether a thoroughfare or not</i></i>	<i>It is considered that the 1875 Act definition of "street" applies, and this does include the term "highway". There is no statutory definition of "highway" under the 1875 Act. All parts of the 1875 Act dealing with highways were repealed by the Highways Act 1959, this Act was subsequently consolidated into the Highways Act 1980.</i>	N/A
1925 Act	<i>It is considered that the 1875 Act definition applies: "Street" <i>includes any highway...and any public bridge, and any road lane footway square court alley or passage whether a thoroughfare or not</i></i>	<i>It is considered that the 1875 Act definition of "street" applies, and this does include the term "highway". There is no statutory definition of "highway" under the 1875 Act. All parts of the 1875 Act dealing with highways were repealed by the Highways Act 1959, this Act was subsequently consolidated into the Highways Act 1980.</i>	N/A
1939 Act	<p>It is considered that the definition in the London Building Act 1930 applies: "street" <i>includes any highway road bridge lane mews footway square court alley passage whether a thoroughfare or not and part of any such highway road bridge lane mews footway square court alley or passage</i></p> <p><i>However, in the case of altering a street name, note that the 2023 Act governs how necessary support is demonstrated and a different definition of "street" applies under the Act.</i></p>	<p>The definition in the London Building Act 1930 of "street" applies and this includes "highway" in the definition: <i>"street" <i>includes any highway road bridge lane mews footway square court alley passage whether a thoroughfare or not and part of any such highway road bridge lane mews footway square court alley or passage</i></i></p>	<p>Empowered to number, name or number and name <i>"any buildings in any street way place row of houses or block of buildings"</i>.</p> <p>The 1939 Act does not include any further definition. The London Building Act 1930 (construed as one with the 1939 Act) does not include a definition of "building" but does include definitions of:</p> <ul style="list-style-type: none"> • "building of the warehouse class" - <i>"means a warehouse manufactory, brewery or distillery or any other building exceeding in cubical extent one hundred and fifty thousand cubic feet which is neither a public building not a domestic building";</i> • "domestic building" - <i>"includes a dwelling-house and any other building not being either a public building or a building of the warehouse class";</i> • "dwelling-house" - <i>"means a building used or constructed or adapted to be used wholly or principally for human habitation";</i> • "public building" - <i>"means</i> <p class="list-item-l1"><i>a. a building used or constructed or adapted to be used as a church chapel or other place of public worship or as a school college or place of instruction (not being merely a dwelling-house so used) or as a hospital workhouse public theatre public hall public concert-room public ball-room public lecture-room public library or public exhibition-room or as a public place of assembly or used or constructed or adapted to be used for any other public purpose; or</i></p> <p class="list-item-l1"><i>b. a building used or constructed or adapted to be used as an hotel lodging-house home refuge or shelter where the building extends to more than two hundred and fifty cubic feet or has sleeping accommodation for more than one hundred persons;</i></p> <p><i>and includes the buildings and premises of the Stock Exchange within the city;"</i></p> <p>Given the above are types of "building", it is considered that the overall definition is very wide and is not just limited to those types outlined above.</p>
Local Acts	Typically, the Local Act in question includes a definition of "street".	The Local Acts examined do not include a statutory definition of "highway". Those that define "street" by reference to the (now repealed) Highways Act 1959 would have benefited in applying that definition from the statutory definition under that Act of "highway".	The Local Acts examined do not include a statutory definition of "building".

Act	Definition of a Street and Commentary	Definition of a Highway and Commentary	Definition of a Building and Commentary
2023 Act	<p>"street has the meaning given by section 48(1) of the New Roads and Street Works Act 1991</p> <p>This is a definition used by some Local Acts a "street" means the whole or any part of any of the following irrespective of whether it is a thoroughfare—</p> <p>(a) any highway, road, lane, footway, alley or passage,</p> <p>(b) any square or court, and</p> <p>(c) any land laid out as a way whether it is for the time being formed as a way or not.</p> <p>Where a street passes over a bridge or through a tunnel, references in this Part to the street include that bridge or tunnel.</p>	N/A	N/A

Street Naming Orders under the 1925 Act - Appeals under Section 8 and Section 18(4)

14. The case of Basildon Borough Council v James [2015] EWHC 3365 (Admin) has been considered. It deals with the approach that an appeal Court should take in respect of Section 18(4) (and the connected Section 8 which deals with appeals). The council proposed to rename streets as part of a redevelopment and residents objected and took the matter to the magistrates' court. The court found against the council.

15. On appeal, the High Court found that the options open to the Judge hearing the appeal are wide but they only apply where the Judge is satisfied that the appellant has shown that the authority's decision on the facts was wrong. The burden is not on the authority to show that its decision was right. Where the Court does find that the authority's decision was wrong then the Judge can exercise his or her powers under Section 8.

16. Paragraphs 38 and 43 of this case provide details of the test of the role of the judge in assessing the authority's decisions. When making street renaming decisions, authorities are advised to consider how this test might be applied in the event of a challenge and demonstrate in its decision making that the decision to be made is correct. The application of the Basildon approach

can be seen in the 2019 decision of District Judge (Magistrates' Courts) D W Taylor in an appeal by Linda Gamlin against a street naming order made by Bath & North-East Somerset Council.

Street Renaming under the 2023 Act

Section 81 of the 2023 Act provides local authorities with the power to alter the name of any street or part of a street provided that the alteration has the necessary support and causes the altered name to be marked. Any power to rename a street under the 1907 Act or the 1925 Act or a Local Act no longer applies. Instead section 81 must be used.

The 2023 Act applies to every local authority in England outside of London. However, section 81 amends the powers under the 1939 Act as they relate to London. The 2023 Act came into force on 31 January 2024,

It was envisaged (given the statements made) that the UK Government would make regulations and issue statutory guidance to provide further support to SNN authorities in undertaking the renaming process and in particular how the authority seeks to obtain necessary support. No such regulations or guidance have been published. The indication from the UK Government is that no regulations or guidance are due.

² Also defined

Therefore an authority can only act where there is necessary support and in the absence of regulations this means that the alteration has sufficient local support. Without regulations or guidance, it is for the individual authority to determine how to demonstrate that support (the process, identifying who is able to show local support and the threshold for local support – i.e. what is local and what is sufficient?). As with any decision making the approach needs to be guided by good public sector decision making – not least that the approach is rational. Whilst not binding, authorities may wish to consider the consultation outcome to see if that provides assistance.

Notes:

- 1 In applying the SNN legislation it is the definition of "street" that is key and not whether something is a "highway". For the purposes of the legislation a "highway" is just one type of "street".
- 2 The generally accepted definition of "highway" can be found in the Highways Act 1980 (section 328) but this only applies in that Act and in others that specifically adopt the definition (i.e. "in this Act the term "highway" shall have the meaning given in the Highways Act 1980"). The definition itself is not overly helpful.
- 3 It is important to distinguish between "highway" and adopted roads/footpaths ("highways maintainable at public expense"). The application of the SNN Acts above is not limited to highways that have been adopted. Highway rights may still exist where the highway is not maintainable at public expense. This means that where street name plates are put up on un-adopted highways the maintenance of those nameplates may still be the responsibility of the local authority in line with the relevant SNN legislation in force.
- 4 As a matter of common law, the "highway" is any route (road, footway, footpath etc.) over which the public has the absolute right to pass and repass without hindrance or charge (use as of right not by licence). The person responsible for maintaining the "highway" is not relevant in this context. A private road, footway, footpath etc. is one where the public does not have an absolute right to pass and repass (they may however have a private licence to

use – e.g. using a private drive owned by a hotel in order to get to the hotel – such a licence is at the discretion of the owner). The SNN Acts are not just limited to "highway".

- 5 It is considered that the term "building" would be construed widely under all of the legislation. Most dictionary definitions of the term "building" refer to something with walls and a roof. In the absence of a clear statutory definition, a court may look to generally accepted definitions elsewhere to aid with interpretation. By comparison, in a planning and listed buildings context the following definition of a "building" is adopted: "...includes any structure or erection³, and any part of a building, as so defined, but does not include plant or machinery comprised in a building".⁴ Following a recent Supreme Court decision⁵ the so called "Skerritts test" applies in both a planning and listed buildings context to determine whether something is a building. This three-fold test is endorsed by the Court of Appeal⁶ and the Supreme Court. It involves considering the size, permanence and degree of physical attachment of a structure or erection (its size, such that it has or would normally be constructed on the land and not ready made; its degree of permanence, such that it would normally remain in place and only be removed by pulling down or taking to pieces; and its physical attachment, although the fact that something is not so attached is not conclusive). There is no direct authority for applying the same test in an SNN context but it may be a useful starting point when considering what does or does not reasonably qualify as a building.

³ Stated to include (in relation to buildings), "extension, alteration and re-erection"

⁴ See Section 336, Town and Country Planning Act 1990 and Section 91(2) and (7), Planning (Listed Buildings and Conservation Areas) Act 1990

⁵ Dill v Secretary of State for Housing and Communities and Local Government and Stratford-on-Avon District Council [2020] UKSC 20

⁶ Skerritts of Nottingham Ltd v Secretary of State for the Environment, Transport and the Regions (No 2) [2000] JPL 1025

Annex E

Section 4, GeoPlace DEC-Addresses v3.4, September 2016



Section 4, GeoPlace DEC-Addresses v3.4, September 2016

(**Note:** Text has been updated to align with this document and reference links removed.)

4 Street Naming and Numbering

4.1 Background

- 4.1.1 Each SNN Authority has statutory functions to ensure all Streets are named and properties numbered. This should be in accordance with the SNN Authority's approved policy. These functions are further detailed in **Annex D**.
- 4.1.2 All types of developments should be subject to the formal SNN process even if the statute adopted by the SNN Authority does not mention a particular type of property, such as the internal numbering of a sub divided building. This helps achieve consistent Street and LPI Records in GeoHub. This applies to all residential, commercial and industrial properties.
- 4.1.3 Maintaining a comprehensive and high standard for naming Streets and numbering or naming of properties is essential as it facilitates:
 - Consistency of property-based information across local government and within the user community. An example of this in practice is Individual Electoral Registration (IER).
 - Emergency services finding a property.
 - Reliable delivery of services and products.
 - Visitors finding where they want to go.

4.2 Policy

4.2.1 New Records

- 4.2.1.1 Anyone responsible for building developments that give rise to new Addressable Objects should liaise with the SNN Authority to determine if new Street Names and / or property numbering or naming schemes are required.

- 4.2.1.2 This should be done as soon as possible after the necessary planning and building regulation approvals are obtained.

- 4.2.1.3 Property owners who require SNN

changes for splits / mergers or other reasons should also refer to the SNN Authority.

- 4.2.1.4 The SNN Authority should mandate a standard policy for the supply of information to and from all developers / applicants to assist efficient SNN.
- 4.2.1.5 Each SNN Authority should display the following information on their website. The items are listed in order of priority:
 - Contact details for the officers dealing with both SNN and the delivery of Authority Address Updates.
 - Details of the SNN Authority process and policy in use.
 - On-line forms to help applicants apply promptly for new:
 - Street Names.
 - Property numbers.
 - Property names.
- 4.2.1.6 The SNN Authority should ensure that all SNN requests for new developments are submitted, preferably electronically, with:
 - A location plan clearly identifying the new scheme in relation to any existing Streets or means of access.
 - A detailed plan of the development clearly marked with the plot numbers of the proposed scheme.
 - An internal layout plan for developments which are subdivided at unit or floor level, for example, a block of flats or commercial, industrial units.
 - The main entrance to each subdivision or block must be clearly marked.
- 4.2.1.7 If requests are submitted with a property naming scheme only, where no numbering scheme exists for the street, the SNN Authority should consider numbering the properties to

assist with the efficient identification of the properties for the purposes of service delivery and emergency services location. If that is possible and complies with the SNN Authority's policy, the following rules should be applied:

- If numbers exist on the Street Name, new properties should be numbered into the existing sequence.
- If the development requires a new Street Name, all properties should be numbered.
- If the existing properties on the Street Name are named only there is no requirement to number new or existing properties.

4.2.1.8 If a developer submits a proposal for an SNN scheme within a development, this can be adopted. However, the SNN Officer must be careful to ensure that this meets the SNN Authority's policy as described in Section 4.2.1.14.

4.2.1.9 Checks should be made to verify any possible conflict or duplication of suggested Street naming and / or property names within and beyond the SNN Authority administrative area of the proposed development.

4.2.1.10 The extent of the search should be beyond the post town area of the proposed Street Name. It is a Royal Mail convention that only one Street Name using the same name should exist within one post town. For the PAF® Code of Practice, Changing Postal Addresses and Postcodes.

4.2.1.11 SNN Officers should be conversant with the principles of BS 7666-1:2006 and BS 7666-2:2006 to ensure all new Street Names and / or LPI Records comply with the standard. They must at least liaise closely with their Authority Address Custodian before the details are agreed with the developer or applicant.

4.2.1.12 Each Authority Address Custodian must ensure that all SNN activities are incorporated within the Authority

Address Update processes to facilitate the future electronic notification of new Records to third parties, including users within the SNN Authority.

4.2.1.13 The SNN Authority should establish a policy that clearly defines the following requirements:

- Planning and / or building control responsibilities.
- Delegated powers.
- Consultees.
- Timelines.

4.2.1.14 The policy should also include the SNN Authority's **view** on the following:

- The exclusion or inclusion of certain numbers for cultural or religious reasons.
- The use of building names without numbers where no numbering scheme exists for the street.
- New building or Street names should not begin with "The".
- The use of Street Names which include numbers which can cause confusion, for example "20 Seven Foot Lane" sounds the same as "27 Foot Lane".
- The use of the names of deceased people in the adoption of any Street Names. The reason for choosing a person's name should be established in the Authority's policy.
- The use of the name of a living person. (This is not recommended).
- The adoption of historic connotations by developers - guidance on this should be provided by the SNN Authority to all developers through close liaison with local historic societies. This information should be provided electronically via the SNN Authority's website.
- The use of national or local historic figures or events.
- The use of a name with Royal connotations. The consent of the Lord Chamberlain's office must

be obtained if a name with any reference to the Royal family or the use of the word 'Royal' is suggested.

- For further information see - <https://www.royal.uk/use-royal-arms> (accessed June 2020)
- The use of names and their combination with numbers that could be considered rude, obscene, and racist or which would contravene any aspect of the council's equal opportunities policies.
- The use of names and their combination with numbers that could be easily vandalised or changed into any of the above, for example, "Canal Turn".
- The use of names that can cause spelling or pronunciation problems.
- The use of names that can be construed to be used for advertising or commercial gain.
- The use of names which would lead to variations in the use of punctuation as these can cause confusion or result in early demands for a change of address from occupiers.

4.2.1.15 A separate internal document should also be in place describing the process to be used for all new and changed Records.

4.2.1.16 The SNN Authority has responsibility for the final approval of a Street Name.

4.2.1.17 When new Records are created, the SNN Officer should work closely with the Authority Street Custodian through the Authority Address Custodian to ensure all parties agree town and locality descriptions.

4.2.1.18 If a Street Name exists within a town, the same Street Name must not be given to a new Street. This reduces the need for new Street Names to be further identified by a locality.

4.2.2 Changing an Existing Address

4.2.2.1 A property owner or their appointed representative must submit a written request for a change of an address, (in DEC-Addresses terms an LPI

Record) to the SNN Authority. The SNN Authority should work towards providing this service via a web-based form, see Example 2 and 3 in **Annex A**, for a list Street Naming and Numbering policy headings and form structure. When the change is considered and, if appropriate, approved by the SNN Authority the rules described in this section must be applied to ensure the change does not cause conflict with any existing LPI Record in that location.

4.2.2.2 If a request is received to add a property name to an existing numbered property (in DEC-Addresses terms an LPI Record) this may be agreed by the SNN Officer, if the following conditions are met:

- There is no conflict with LPI Records with the same Street Name.
- The addition of a property name is allowed for in the SNN Authority's approved policy.
- The property number must be retained.
- The request adheres to the PAF® Code of Practice, Changing Postal Addresses and Postcodes.

4.2.2.3 If a property is already named and numbered and a request is made to remove the number from the Official Address this must be refused. The SNN Authority should use its statutory functions to enforce the display and use of a property number as provided for within the relevant Act.

4.2.2.4 If a request received involves the change to an existing Street Name, the applicant must be informed of the formal process that must be adhered to before the change can be made. For the PAF® Code of Practice, Changing Postal Addresses and Postcodes.

4.2.2.5 The 1907 Act states that 'The local authority may, with the consent of two-thirds in number of the ratepayers and persons who are liable to pay an amount in respect of council tax in any street, alter the name of such street

or any part of such street.' However, consent of two thirds of the taxpayers does not oblige the SNN Authority to implement a change.

4.2.2.6 Under the 1925 Act, notices must be posted along the Street giving others the chance to object to or support the change within 21 days.

4.2.2.7 If an SNN Authority operates under a local Act they must refer to the relevant statute to discover the consultation requirements. Internal processes must then be followed for a decision to be made. If the change to a Street Name is agreed, a legal order will be issued.

4.2.3 Notification Process

4.2.3.1 The Authority Address Custodian should notify the usual internal contacts after the data is entered into the LLPG. All commercial and residential owners and occupiers of addresses affected should be notified of the change to their Official Address, which might involve a change of the Royal Mail postcode. For the PAF® Code of Practice, Changing Postal Addresses and Postcodes.

4.2.3.2 The LLPG must be used to disseminate any ACI throughout the SNN Authority and to external users. This can be achieved in the following ways:

- Population of UPRN into all linked applications.
- Maintenance of Application Cross References to external applications within the LLPG.
- Dynamic address lookup between linked applications and the LLPG data.
- Frequent LLPG address export to linked application.
- Maintenance of SNN specific Application Cross Reference Records within the LLPG.
- Manual and / or e-mail notification to interested parties if no dynamic link currently exists.

4.2.3.3 All new SNN Records must be allocated a unique reference number

to ensure that there is a clear Record that the source of the Official Address data is the SNN Authority. This is important for the following reasons:

- It proves who owns the Official Address data.
- In the future it can be used to identify which Official Addresses must be included in any automatic notification to third parties.
- It provides an audit trail to help SNN Authorities reconcile any payments they receive for Official Address information distributed.
- It links to the setting of the Official Address flag in the LPI Record.

4.2.3.4 The Authority Address Custodian should enter the number into the cross reference table, using one of the data source codes shown in the table below:

Suffix	Data Source
S1	Street Naming and Numbering Conversion
S2	Street Naming and Numbering Demolition
S3	Street Naming and Numbering New Build
S4	Street Naming and Numbering Renaming / Renumbering
S5*	Street Naming and Numbering Retrospective

***Note:** S5 should be used if the official SNN Authority process is used to confirm an existing address.

4.3 Best Practice

4.3.1 Street Naming

4.3.1.1 An SNN Authority must not create a Street Name similar to or the same as one which already exists if any of the following conditions apply to the Street Name:

- It is in use in the same locality.
- It is in use in the same town.
- It is in use in the same post town.
- It is in use in the same town or post town within a neighbouring SNN Authority's administrative area.
- The purpose of this is to avoid confusion, for example, resultant Street Names could be identical in every way including post town.

4.3.1.2 Checks must be made to ascertain if any of the above conditions apply. Consideration must be given to the identification of properties on the new Street Name for the purposes of other service delivery users and in particular, the emergency services to ensure there is no ambiguity when the new Street Name is added to the existing Street Records.

4.3.1.3 Streets in close proximity should not be assigned the same name with a different suffix, for example "Birch Road", "Birch Avenue", "Birch Park" and "Birch Crescent".

4.3.2 Property Numbering

4.3.2.1 The SNN Authority must number all new property developments regardless of development type. The exception to this rule is if new properties require names or numbers on an existing Street Name where no numbering exists. The SNN Authority should consider creating a numbering scheme if it causes no problems for existing property owners.

4.3.2.2 Street Names should be numbered so that when travelling away from the centre of a town odd numbers are on the left hand side and even numbers on the right unless an established local convention is different.

4.3.2.3 Street Names should be numbered ascending from the most important Street from which they lead.

4.3.2.4 Infill development on an existing numbered Street Name should include any required suffix to property numbers if no consecutive number is available in the current numbering scheme or if more numbers are required than numbers are available. The SNN Authority should also consider creating an additional Street Name.

4.3.2.5 In certain cases it is more appropriate to number properties sequentially, for example cul-de-sacs.

4.3.2.6 Merged properties must adopt a previous Addressable Object as their identifier if property numbers are

used. Therefore, the merging of two properties at "4 High Street" and "6 High Street" results in a new Record which includes the number "4" or "6". For example the new Addressable Object Record is "4 High Street", "6 High Street" or "4 to 6 High Street". Previous Addressable Object Records for "4" and "6 High Street" should be flagged as historical Records within the LLPG. Similarly, the merging of three properties at "2", "4" and "6 High Street" result in a new Addressable Object Record which includes the number "2" or "4" or "6".

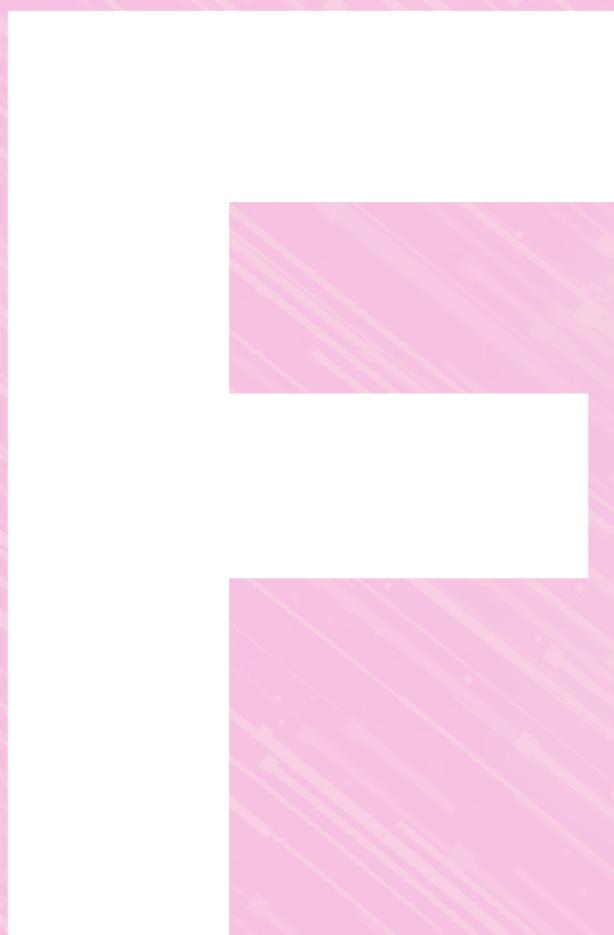
4.3.2.7 Sub-divisions of property should always be numbered rather than described or lettered therefore "Flat 1" should be used rather than "First Floor Flat" or "Flat A".

4.3.2.8 Conversion of a house to flats with a common entrance should result in the creation of Child Records referenced to a Parent property rather than the creation of suffixed numbers, for example, "Flat 1 36" not "36A".

4.3.2.9 All properties must be numbered and / or named onto the Street Name which provides direct access to the property, which is generally the Street that the front door of the property faces. All other accesses must be retained as recognised Alternative LPI Records for the property, associated with the same UPRN.

Annex F

Responding to Calls for Public Realm Changes



LGA Information sources

The LGA has published a range of public engagement material on their [website](#). These include:

- New Conversations: LGA guide to [engagement](#).
- Building cohesive [communities](#).
- New Conversations 2.0 - LGA guide to [engagement](#).
- Responding to Calls for Public Realm Changes.

The [Responding to Calls for Public Realm Changes](#) document below makes reference to street naming and the importance of seeking a balanced view for change with the local community leaders. Engagement with local historians and cultural academics to add value to contentious sites is also discussed.

REPORT



Responding to Calls for Public Realm

12 June 2020

Many councils are currently receiving calls for changes to the names of estates and streets, and the removal of statues - and objections to such proposals. Building cohesive communities lies at the core of councils' day to day business and, as leaders of place, shaping and supporting a local identity and helping to develop relationships and engagement between different parts of the local community are key to achieving this.

The suggestions below are aimed at ensuring that whether or not a proposed change takes place, the outcome does not damage community cohesion and indeed provides an opportunity to enhance it.

Those calling for change may not appreciate the limits on the role of a council in delivering it. These may need to be clarified publicly. Some statues etc may not be under council control, for example if they are on private land. In such cases the council may still have a role in granting planning or naming approval for changes. Statues may also be listed, and councils may want to liaise with the listing authorities over planned changes.

While either removing or retaining a name/icon may sometimes be simple and uncontroversial, where it is not objections may be made on practical grounds (e.g. around change of address) or on grounds of heritage and identity (the name of a street someone grew up on is part of their identity and may be a part they are not prepared to give up).

Where there are strong feelings for and against change, the [LGA cohesive communities guidance](#) provides a helpful general context. The LGA has also produced two best-practice guides on community engagement which may be found [here](#) and [here](#).

In terms of the specific issue of public realm changes, the points below may be helpful:

- 1 Establishing a forum for discussion.
 - All sections of the community have to feel heard by decision-makers, but also by each other.
 - Councils should avoid telling people how they should feel or making assumptions about how they do feel. Simply telling people they are wrong to be offended (whether they are offended by a statue or by a proposal to remove it) never works.
 - Changing street names has practical ramifications for businesses and for people who live there, but these are solvable.
 - Where a change is contentious, councils may wish to provide opportunities for people to set out their views in detail, rather than simply expressing support for or opposition to a proposal. Where appropriate, community leaders may be able to help engage hard-to-reach groups.

- Establishing a community dialogue can allow a divisive issue to become an opportunity for understanding on both sides. The aim of dialogue should be that sections of the community talk to each other, as well as to the decision-making body, encouraging people to understand how a name or statue makes others feel and how removing what someone sees as part of their heritage makes *them* feel.
- For dialogue to work, people must feel represented – councillors obviously have a role here, both as representatives and in terms of identifying other key actors.

2 Establishing a measure of objectivity

- Involving historians or cultural academics can assist in producing an approach that can be defended as objective. There is a wealth of expertise and experience available around relevant projects (for example, Historic England's Immortalised).
- Historians may also be useful in making a distinction between history, heritage and 'the past'.
- Academics may be able to help establish disputed facts and explore nuanced interpretations.
- There may be advantage in establishing a common set of criteria to apply to every case. The criteria need to be academically valid and be accepted by the community for this to be effective.
- Councils should undertake due diligence before appointing people to any commission etc, to ensure their views will carry objective weight.

3 Countering extremism

- Visible local leadership is an important aspect of this helping to avoid leaving a vacuum that extremists might exploit.
- Again, the question of representation is key. It makes sense to consider the views of visitors; at the same time, it is relevant to ask who is speaking for whom.

4 Considering a suite of solutions in addition to 'erasing' a statue or street name:

- Relocating it to a museum where it can be seen in context as part of local/national history (this carries logistical and cost challenges, but may be an activity that could attract business funding).
- Place an explanation at a contentious site, as was attempted in Bristol.
- Balance (for example) a contentious statue with a memorial to victims of the slave trade or a naming, such as Windrush Square in Brixton. This is not going to be acceptable in every case.
- The community should be offered an opportunity to suggest resolutions.

Examples of approaches:

- Liverpool has set up a museum of the Slave trade and is planning plaques on streets whose names are associated with the slave trade.
- In London, the Mayor is appointing a Commission for Diversity in the Public Realm which will focus on increasing representation among Black, Asian and Minority Ethnic communities, women, the LGBTQ+ community and disability groups.
- Bournemouth, Christchurch and Poole council plans to temporarily remove a statue to safe storage after warnings that it may be attacked and announced that it plans to involve all relevant communities and groups in discussions about its future.
- Manchester has announced a review of its statues and will take the opportunity to ask the public who should have a statue but is currently 'missing', with particular focus on BAME figures.
- The leader of Shropshire Council has publicised the provision in the council's constitution that all petitions that gain 1,000 signatures are presented to, and debated by, full council.
- Plymouth is renaming a square and may add an explanation to the Drake statue.
- The leader of Cardiff Council, supports removing a statue of the slave-trader Sir Thomas Picton from Cardiff City Hall and is proposing a Task Force to work with Black Communities in Cardiff.



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