



Corporate Peer Challenge **New Forest District Council**

2nd to 5th October 2017

Feedback Report

1. Executive Summary

New Forest District Council has an excellent understanding of its local context – the particular mix of the New Forest National Park, covering much of the area of the district, the more densely populated urban areas around the edge and a significant length of coastline. These provide a range of both challenges and opportunities for service delivery and development, and to ensure sustainable communities. The New Forest area provides significant complexities in terms of governance arrangements, both from its historic origins as an ancient royal hunting forest and much more recently the National Park Authority, which is the planning authority for about 80% of the area of the district. This understanding of the area is expressed in the Council's commitment to preserve what is unique about the area, including ensuring that the New Forest remains a 'living forest', and an appropriate statement of Vision and Priorities. The Council demonstrates a desire to take advantage of regeneration opportunities such as those presented along the area of Totton and Waterside.

Both the Leader and Chief Executive are well respected and seen to be taking the lead in making the case that the Council must change how it does things if it is to remain financially secure and successfully meet the challenges of the future. Front line services are run in a way which takes account of local circumstances and resident satisfaction with these services is reported to be very high. Member-officer relationships are good, the workforce is loyal to the authority and committed to the area and value their colleagues. Many of that workforce also recognise that change is required and would like to contribute to developing and delivering new ways of working for the district. The Council is financially sound, and enjoys a relatively healthy level of both general fund and capital reserves and is well positioned to invest in the future. But it also understands that revenue funding will become more challenging and there is an increasing need to deliver savings.

The Council is therefore well placed to address the future challenges on behalf of the district, but a number of issues need to be addressed if it is to do so effectively. The Council needs to ensure that the sense of being a 'special place' does not get in the way of doing things differently or become a barrier to partnerships, particularly beyond the district boundaries. It needs to consider what it wants to achieve for the whole of the New Forest district and its residents, and then consider how best to deliver this – to improve outcomes and reduce costs where possible. More rigorous options appraisals, drawing on external expertise where appropriate, would be helpful. Most of the Council's services are delivered in-house. There needs to be a wider recognition that other arrangements may well achieve the same or better outcomes for communities on behalf of the Council, for example in respect of the operation of five Health and Leisure Centres.

There needs to be a clearer articulation of what the council of the future will look like, and the Organisational Strategy needs to be underpinned by clear plans to deliver that vision and the Council's priorities. Senior managers need to engage more effectively with service managers and empower staff to make greater use of the knowledge, leadership capacity and willingness across the organisation to deliver change. There is a widespread recognition that the Council's ICT infrastructure is inadequate and needs significant enhancement to drive efficiency gains and leverage change. The Council should use some of its capital resources to invest in rapid improvements to ICT. But this investment alone

will not bring about new and improved ways of working, there is still more work to do to ensure that all members and officers embrace the need to do things differently. The financial investment must be supported by thorough analysis and demonstrate how it can deliver value for the Council.

Delivering sufficient housing, along with employment opportunities for local residents, is a key challenge for the Council in ensuring sustainable communities across the New Forest district. Relationships with the National Park Authority are crucial for the Council in this regard. It needs to consider how it can sustain good relationships with the Park Authority, along with the ability to provide effective challenge on behalf of the communities of the New Forest and the wider district, including in respect of housing allocations. It has been over 10 years since the National Park Authority was created. The Council should reflect on the arrangements in place for engaging with the National Park to best represent the broader responsibilities of the District Council. The issue of the identity of the wider District is important. This is not synonymous with the National Park area where just 20% of the population of the district live, although many more value the recreational opportunities and high quality environment it offers.

The Council is in the process of developing a new Local Plan. This will have a major impact on the future of the District, including the provision of the housing which it knows local people need along with sustainable development and economic regeneration. It needs greater focus and drive to get a sound, robust Plan in place to shape that future and avoid the risk of unwanted development.

2. Key recommendations

- a) Develop the strategic framework with underpinning action plans to deliver the Council's vision for the broader district area
- b) Align the Medium Term Financial Plan and investment strategies within that strategic framework
- c) Consider alternative models for delivery through options appraisals and the use of external expertise to most effectively achieve the Council's objectives
- d) Invest in your ICT infrastructure to leverage change
- e) Engage with staff and managers in developing the future direction of travel for the Council
- f) Review levels of decision making to empower managers and staff to deliver
- g) Review the requirements for more formal engagement arrangements with the National Park Authority including, to be fully effective, a review of current appointments to the National Park
- h) Prepare a robust and sound Local Plan, in a realistic but timely way.

3. Summary of the Peer Challenge approach

The peer team

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected your requirements and the focus of the peer challenge. Peers were selected on the basis of their relevant experience and expertise and agreed with you. The peers who delivered the peer challenge at New Forest were:

- Dorcas Bunton, Chief Executive, Derbyshire Dales District Council
- Cllr Andrew Proctor, Leader, Broadland District Council
- Lindsay Barker, Deputy Chief Executive, Mid Suffolk and Babergh District Councils
- Mark Green, Director of Finance & Business Improvement, Maidstone Borough Council
- David Armin, LGA peer challenge manager

Scope and focus

The peer team considered the following five questions which form the core components looked at by all Corporate Peer Challenges. These are the areas we believe are critical to councils' performance and improvement:

1. **Understanding of the local place and priority setting:** Does the council understand its local context and place and use that to inform a clear vision and set of priorities?
2. **Leadership of Place:** Does the council provide effective leadership of place through its elected members, officers and constructive relationships and partnerships with external stakeholders?
3. **Organisational leadership and governance:** Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?
4. **Financial planning and viability:** Does the council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?
5. **Capacity to deliver:** Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?

In considering these core components, the Council asked the peer team to give attention to the following issues:

- With the further reductions in funding, how effective are our arrangements to deliver with less?
- Can the organisation sustain capability and capacity within its existing workforce?
- Are arrangements in place to support new ways of working?

The peer challenge process

It is important to stress that this was not an inspection. Peer challenges are improvement-focused and tailored to meet individual councils' needs. They are designed to complement and add value to a council's own performance and improvement focus. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.

The peer team prepared for the peer challenge by reviewing a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The peer challenge began with an orientation tour around the District, with visits to some key sites and projects, giving the opportunity to speak with some of the Council and partner staff who work there. This was a valuable opportunity for the team to see the wide range of different communities and environments which make the New Forest District a special place and the challenges these present.

The team spent four days onsite at New Forest, during which they:

- Spoke to more than 60 people including a range of council staff together with councillors and external partners and stakeholders.
- Gathered information and views from more than 30 meetings, visits to key sites in the area and additional research and reading.
- Collectively spent more than 200 hours to determine their findings – the equivalent of one person spending more than five weeks in New Forest District Council.

This report provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of their on-site visit (2nd to 5th October 2017). In presenting feedback to you, we have done so as fellow local government officers and members, not professional consultants or inspectors. By its nature, the peer challenge is a snapshot in time. We appreciate that some of the feedback may be about things you are already addressing and progressing.

4. Feedback

4.1 Understanding of the local place and priority setting

New Forest District Council has an excellent understanding of its local context. The particular mix of the New Forest National Park (covering much of the area of the district and with a unique approach to land management based on ancient grazing rights), the more densely populated urban areas around the edge of the district and a significant length of coastline, including the largest oil refinery in the country. These provide a range of both challenges and opportunities for service delivery and development, and to ensure sustainable communities. This understanding of the area is demonstrated in the Council's commitment to preserve what is unique about the area, along with a desire to take advantage of regeneration opportunities. These include those presented along the area of Totton and Waterside, such as the proposals for development for the now disused Fawley power station (once one of the largest buildings in Europe).

There is a positive acceptance of the need for development among elected members and the wider community. For example, in the recognition of the importance of more social and affordable housing in the New Forest National Park area if a living, working New Forest is to be sustained. High house prices and low wages for many working within the District make affordable housing and promoting business growth (especially higher value added work) the key challenges, whilst protecting the special characteristics of the place. This is acknowledged in the priorities in the Council's 2016-2020 Corporate Plan. These priorities now need further articulation in terms of what the Council wants to achieve and more detailed plans to deliver them. For example, by taking advantage of current work to develop a clear strategy for the economic development of the District.

The special nature of the New Forest area is a real asset – contributing to a high quality of life for residents and attracting visitors, in addition to its environmental value. But it gives rise to a number of issues and challenges. The New Forest NP covers most of the District and in turn lies mainly within the District boundaries. Council plans should reflect the needs of the broader district area. The influence of the area of the National Park is significantly important, but should be proportionate with the broader district area needs – given that just 20% of the District population live within the area of the National Park. During our review this did not always appear the case. The identity of the National Park and the Council are closely intertwined but should not be synonymous. The Council needs to ensure that its identity and plans more fully reflect the needs of the population and economic and other activity beyond the area of the National Park. The further development of the Corporate Plan and the Organisational Strategy 2022 provide the opportunity to do this. Moreover, the sense of being a 'special place' may be a barrier to addressing some challenging issues. This is evident in an apparent reluctance by some to consider alternative delivery models to achieve the Council's objectives, and a belief that learning and good practice elsewhere may not be transferable to the unique circumstances of the New Forest. We believe

that this mindset is changing, but this openness to new ways of doing things needs to be further nurtured and supported.

4.2 Leadership of Place

The New Forest area has significant complexities in terms of governance arrangements, both from its historic origins as an ancient royal hunting forest and much more recently, with the creation of the National Park Authority (NFNPA). The NFNPA is the planning authority for about 80% of the area of the District. A substantial part of the Park is Crown lands, managed by the Forestry Commission. These complex governance arrangements make partnership working within the District particularly important. The Council has a good understanding of these arrangements and the Leader and Chief Executive are both well respected by partners. Influencing partners, especially the Park Authority, will be crucial to achieving the Council's vision for the District. The NFNPA's principal objectives are to protect the natural and cultural heritage of the area and to promote the public understanding and enjoyment of these. But it has a secondary objective of fostering the social and economic wellbeing of local communities, which provides common ground with the Council's priorities and in turn provides the opportunity to further strengthen relationships. Such opportunities include the development of the Green Halo partnership, intended to provide an exemplar of how precious landscapes can work in harmony with thriving economically successful communities.

The relationship with the NFNPA is of key importance – for example in addressing the need for more housing. The Council needs to ensure that this relationship is strong enough to allow for robust challenge and for areas of difference to be resolved. The Council should consider whether a formal engagement mechanism, involving leading District Councillors and Park Authority members would better enable the Council and Park Authority to discuss their respective areas of interest and provide an opportunity for improved cooperation and challenge, where appropriate. Currently, there are eight District Councillors who sit on the Park Authority (out of a total of 22 members of the NFNPA). Four are appointed by the District Council and four by the County Council, including both the Leader and Deputy Leader of the Council. A more formal arrangement for relationships between the Council and Park Authority could help to ensure leading Councillors are in a position to maximise their influence. Although to be fully effective, it would require a review of existing appointments to the Park Authority.

The Council has recognised the importance of partnerships in promoting the economic development of the District and has engaged well with Hampshire County Council and the two Local Enterprise Partnerships (LEPs) that affect the area – the Solent and M3 LEPs. This has led, for example, to investment in facilities at Brockenhurst College. The LEPs are ready to consider further investment in the District, but are looking for more delivery-ready schemes. The Council is also developing a framework so that it can work with partners to realise the development opportunities which exist along the area of Totton and Waterside. The sense that New Forest is 'different' can be a barrier to establishing

partnerships beyond the District boundaries. The location of the district (across the Solent from the rest of Hampshire and on the boundary of two former Government office regions) gives rise to a perception that the Council has 'no natural partners'. But the above examples around economic development show that New Forest is able to forge effective partnerships around shared objectives.

Providing sufficient and affordable housing is a key challenge for the District, which will require leadership. The Council has already shown this through its agreed policy and allocation of resources to build more council housing, which is leading to the construction of some high quality council housing of innovative design. However, we noted some frustration among members and officers at the resistance of the Park Authority to agree further social housing which would help build more sustainable communities in the area of the National Park.

The Government consultation on objectively assessed need (OAN) for housing was published in September 2017. Under the proposed standardised methodology an assessment has been made of 965 new homes per annum over the period 2016 – 2036 across the District. If confirmed at this level, this will be very difficult to achieve in practice. The consultation acknowledges that 86% of the District is national park or similar land where development opportunities are particularly limited. A figure for housing need in these areas is not given and should be determined locally. The consultation also notes that the duty to co-operate will be crucial for authorities in such a situation, provision in other authorities to meet their housing need could be particularly important. Again this speaks to the importance of good relationships and strong partnerships, but also that of the Local Development Plan irrespective of the final figure for OAN. The Council is in the process of updating its Local Plan and is preparing its plan for submission in mid-2018. This needs to be a credible and sound Plan to shape the district as the Council wishes, deliver the housing needed and reduce the risk of unwanted development. Such a realistic plan will mean the Council is better placed to influence its partners (the NFNPA and neighbouring authorities) around housing allocations. We understand that the Council is giving focus and attention to the Local Plan, which it needs to continue to drive through. The experience of other District Councils in developing sound Local Plans is that very significant time and resource is required. The Council needs to be satisfied that it has the appropriate capacity.

4.3 Organisational leadership and governance

The Council has well established and experienced political leadership. The ruling Conservative group has a large majority. The Chief Executive was appointed in 2015 following an internal promotion. There are good member-officer relationships and members value staff and the contribution they make. There are a number of opportunities for members to be engaged and help shape the future direction of the Council if they wish, for example through overview & scrutiny and related task & finish groups and through questions at Cabinet meetings. Task & finish groups are considered to have helped foster good relationships between members and a wider range of officers. The engagement of elected members could be widened and made more effective by more clearly linking task & finish groups to Council priorities.

The Leader and Chief Executive have been visible in making the case for change through a series of staff briefings. These have emphasised the financial challenges which lie ahead and the need for the council to be leaner and work more flexibly and responsively, taking advantage of new technology and new methods of service delivery. This is laid out in the Organisational Strategy 2017-2022. Staff recognise and understand the need to change the way they work. They feel that managers are generally accessible, particularly in their own service areas. They also feel well supported through access to training and development opportunities.

This provides the Council with a good basis on which to take forward change, but more needs to be done. There is a sense that New Forest is 'on the cusp of change', but staff need a clearer articulation of what the council of the future will be like (beyond having less employees and a smaller budget); the underlying drivers for change and what this will mean for them. Some staff felt that Executive Management Team (EMT) was remote, notwithstanding that line management was considered accessible. It may be that there is still a culture of silo-based working. We found clear evidence of a commitment to New Forest, leadership capacity and the potential for innovation in managers and staff across the organisation. The Council needs to harness this more effectively. Service managers could be more involved with EMT in contributing towards strategic thinking and developing the future organisation, for example through periodic joint sessions with EMT to work through particular issues in depth. The Council could build on the staff engagement with change which the previous 'Fit for the Future' programme had established. More generally, the Council should allow staff greater freedom to take and deliver operational decisions within an agreed framework of priorities and standards.

The Council's approach to strategy development in general could be more robust, based on evidence, consultation and engagement with relevant stakeholders. Its agreed strategies should include clear actions to deliver the intended outcomes. For example, the Organisational Strategy needs to be further developed with specific action plans to deliver the intended outcomes and savings.

4.4 Financial planning and viability

The Council enjoys a healthy financial position at the current time relative to many of its peers, notwithstanding the reduction of central government grant funding in recent years. The net revenue budget for 2017-18 is £18.2 million. The Council has a comparatively high level of reserves which have increased in recent years (some £50 million in total when Housing Revenue Account (HRA) reserves are included). At 31st March 2017 general fund reserves were £3 million and capital reserves some £19.5 million. The relatively healthy level of reserves means New Forest is well placed to invest to achieve future efficiency gains. This financial position has been aided by the budget stabilisation strategy to date (essentially top slicing the required savings from each portfolio budget area) and a track record of underspending each year. Although helping to contribute towards reserves, there is a lack of clarity around the reasons for this pattern of underspending. It was attributed in part to unspent asset maintenance budgets. It may also reflect an excessively cautious approach to spending and a wish by service managers to retain some local flexibility in their budgets.

The external audit for 2016/17 gave a positive view of the financial statements. The Annual Financial Report was finalised over a month before the deadline, which means the Council is well-placed to meet the earlier, end July 2018, deadline for the 2017/18 accounts.

However, the Council recognises that the revenue (general) funding will become more challenging over the next few years. Assuming members continue to approve the maximum increase in Council Tax permitted without a referendum (£5 per household per annum), and some cautious assumptions on cost pressures (such as salary inflation remains at 1%), there is a funding gap of £1.4 million per annum by 2021-22, where actions to deliver the required savings have not yet been identified. This will be greater if cost pressures are larger than anticipated or other planned savings are not delivered.

The Council has relatively limited land and other revenue earning assets, apart from those required for service delivery or council houses. The Treasury Management Strategy allows for long term investment to achieve greater returns. The Council is making effective use of external advice both around Treasury management and budget planning. It has recently adopted a commercial property investment strategy to enable investment of up to £30 million and is considering establishing a non-HRA housing development company. Here, too, it is important that the Council makes effective use of professional advice in deploying its resources.

There are some examples of the Council taking innovative approaches to secure a better return on assets. For example, it has entered into a public / private partnership for management of the Dibden Golf Centre, which is leading to improved returns of circa £150k per annum, and its relationship with Creative England which has brought filming for cinema and television into the area. The Council now needs to extend such approaches into other areas of its business.

To deliver more significant and sustainable savings to address the budget gap, whilst continuing to deliver the outcomes it wants to achieve in the community, the Council needs to make more use of options appraisals and external expertise to identify how best to deliver those outcomes. Moreover, the most effective delivery model need not always be the Council itself. For example, the Council runs five Health & Leisure Centres and has invested in these to offer an impressive level of facilities, which are valued by those that use them. However, this approach should be subject to an options appraisal to see if the current delivery model is the best way to achieve the desired health and wellbeing outcomes across the wider community. Such a review may help to ameliorate pressures on the revenue budget while continuing to deliver the desired outcomes on behalf of the Council.

The Council's use of financial resources should be more clearly linked to its strategic priorities, through both the Corporate Plan and in the Medium Term Financial Strategy (MTFS). The MTFS should show how the strategy flows from corporate priorities. At present it has too narrow a focus, as it concentrates principally on how to address the projected budget gap. A more strategic approach to financial planning could be beneficial, with more use of scenario planning and risk assessment. The pattern of regular underspends may indicate that resources have not been as effectively aligned to priorities as they could have been. Similarly, actions to deliver the required savings should be made more explicit where possible. In line with our earlier observations regarding the Council's approach to strategic planning, its business planning processes should be more robust and compliant with recommended practice in some areas. For example, we would expect it to have a 30 year business plan for the HRA, not least because this is such a significant area of activity and investment for the Council.

The Council's section 151 officer (formally responsible for giving financial advice to the Council), although reporting to a member of EMT, is not formally part of EMT but he does attend its meetings *ex officio*. Although we understand that the postholder has regular access to both the Chief Executive and portfolio holder for Finance, the Council needs to continue to satisfy itself that the post has sufficient status to discharge the statutory duties effectively.

We understand that the Council's financial regulations have not been reviewed for several years. Levels of delegation to service managers appear unrealistically low. The Council may wish to review this, as part of a wider consideration of levels of decision making, to promote more flexible and effective working.

4.5 Capacity to deliver

The Council has a committed workforce who are happy to work for it and take pride in New Forest. They are clearly prepared to 'go the extra mile' and members recognise and value this.

There are a number of good and innovative projects which the Council has implemented, sometimes in the face of some initial opposition from sections of the community. These include the scheme at Milford on Sea to reinstate the sea defences, incorporating beach huts, in a particularly innovative and impressive

design. Both had been damaged during severe weather a couple of years ago – the immediate emergency response to this incident being an example of staff commitment to serving the community. (The Council's experience of coastal management means that it is the lead authority for regional coastal monitoring).

The Council engages well with service users and residents. A particularly good example is the Tenant Involvement Volunteers, who provide a link between the authority and its council house tenants. They undertake surveys of resident's opinions, offer help and advice to new tenants and have commented on and influenced the development of the Council's policies and practices in respect of housing management, including improved signage; a customer charter and the voids policy and the use of items of furniture etc. left by previous tenants. It is felt the Council is much more responsive to tenant concerns than a few years ago.

The Council works well with local partners such as Town and Parish Councils. Their relationships with the District Council are generally regarded as good and there are a number of service delivery partnerships, such as the recently refurbished Ringwood Gateway. This provides a one-stop shop to access services of the Town, District and County Councils and shared office space, including a drop-in centre with workstations for use by both New Forest and Hampshire's staff.

The Council delivers services that are tailored to the local context and valued by residents. Satisfaction with services as measured by surveys of users of leisure services and housing etc. is high. It endeavours to provide services which respond to residents' expectations and local circumstances. For example, refuse collection is by black sacks as wheelie bins are not practical in many parts of the district, where gravel drives with cattle grids are commonplace. But an unintended consequence of this is that recycling rates are low compared to the national average. Text messages are used to encourage residents to place out their glass recycling. In a situation where there will be continuing reductions in revenue budgets, we believe that the Council needs to review service provision and challenge what is actually needed, to ensure it is proportionate and affordable.

This should also include consideration of the most effective service delivery models, including more use of partnership approaches with partners from both public and private sectors. Partnership working and shared service arrangements have been relatively limited to date, mainly with the National Park, parish councils and Hampshire County Council. There now appears to be a greater willingness to consider such opportunities, which may not only realise financial savings but also offer greater resilience and opportunities to access learning and good practice from elsewhere. More generally, there is need for the Council (both members and officers) to be more open to new ways of working, good practice and fresh thinking from elsewhere. The perceived 'specialness' of New Forest should not be barrier to learning and doing things better.

We have noted the Council's strong financial position in terms of its capacity to invest. It now needs to take advantage of this. The ICT infrastructure is a source of frustration, leading to a continuing reliance on manual systems in some areas. The payroll system was cited as requiring improvement. Significant investment is

required to unlock efficiencies, create capacity and provide solid business information to support decision making and the development of evidence-based strategies. This investment will consist both in management time analysing and developing solutions, and cash investment in human and physical resources to enable effective implementation. The website was identified by a number of people as needing a thorough revamp to make it accessible and useful from a resident / service user perspective.

Better ICT is seen as key to more flexible working, to realise efficiency gains and financial savings and potentially make the Council a more attractive place to work in future. However, ICT is only part of the solution in terms of delivering new ways of working. Investment in ICT needs to be supported by informed and expert analysis of the problems to be addressed and the opportunities that technology offers. Cultural issues need to be addressed too. There is a need to empower staff so that they feel confident that they can exercise discretion and flexibility in delivering results to meet agreed objectives. In terms of flexible / home working, a number of staff continue to value the social aspects of coming to work. The Council will need to ensure that there are arrangements for team meetings and similar to address this and support information sharing across teams and the wider authority.

There are significant levels of experience and skills among the Council's workforce. However, recruitment difficulties are becoming a concern, particularly to service managers, and vacancy rates are relatively high. High housing costs and poor public transport links and the relative isolation of the New Forest area may be a barrier to recruitment. There will also be competition for talent from larger nearby authorities such as Bournemouth and Southampton. So it will be increasingly important to invest in growing and retaining the Council's own talent, including through ensuring New Forest remains a fulfilling and more flexible place to work, where staff are engaged in the future direction of the authority and take satisfaction in providing good services to residents and visitors.

5. Next steps

Immediate next steps

We appreciate you will want to reflect on these findings and suggestions with your senior managerial and political leadership in order to determine how the Council wishes to take things forward.

As part of the peer challenge process, there is an offer of further activity to support this. The LGA is well placed to provide additional support, advice and guidance on a number of the areas for development and improvement and we would be happy to discuss this. Kate Herbert, Principal Adviser is the main contact between your authority and the Local Government Association (LGA). Her contact details are: Tel 07867 632404 or Email kate.herbert@local.gov.uk .

In the meantime, we are keen to continue the relationship we have formed with you and colleagues through the peer challenge. We will endeavour to provide additional

information and signposting about the issues we have raised in this report to help inform your ongoing consideration.

Follow up visit

The LGA peer challenge process includes a follow up visit. The purpose of the visit is to help the Council assess the impact of the peer challenge and the progress it has made against the areas of improvement and development identified by the peer team. It is a lighter-touch version of the original visit and does not necessarily involve all members of the original peer team. The timing of the visit is determined by the Council. Our expectation is that it will occur within the next 12-24 months.