



**East Suffolk House, Riduna Park, Station  
Road, Melton, Woodbridge, IP12 1RT**

# Cabinet

## **Members:**

Councillor Steve Gallant (Leader)  
Councillor Craig Rivett (Deputy Leader and  
Economic Development)  
Councillor Norman Brooks (Transport)  
Councillor Stephen Burroughes (Customer  
Services and Operational Partnerships)  
Councillor Maurice Cook (Resources)  
Councillor Richard Kerry (Housing)  
Councillor James Mallinder (The Environment)  
Councillor David Ritchie (Planning & Coastal  
Management)  
Councillor Mary Rudd (Community Health)  
Councillor Letitia Smith (Communities, Leisure  
and Tourism)

Members are invited to a **Meeting of the Cabinet**  
to be held on **Tuesday, 5 January 2021 at 6:30pm**

This meeting will be conducted remotely, pursuant to the Local Authorities and  
Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police  
and Crime Panel Meetings) (England and Wales) Regulations 2020.

The meeting will be facilitated using the Zoom video conferencing system and  
broadcast via the East Suffolk Council YouTube  
channel at [https://youtu.be/p3\\_3noRbBAk](https://youtu.be/p3_3noRbBAk)

**Please note, this agenda was re-published on 24 December 2020 to  
incorporate the late report for item 12 - Council Tax Base 2021/22.**

An Agenda is set out below.

## **Part One – Open to the Public**

### **Pages**

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**1 Apologies for Absence**

To receive apologies for absence, if any.

**2 Declarations of Interest**

Members and Officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.

**3 Announcements**

To receive any announcements.

**4 Minutes**

**1 - 8**

To confirm as a correct record the Minutes of the Meeting held on 1 December 2020

### **KEY DECISIONS**

**5 New Beach Hut Site - Felixstowe ES/0609**

**9 - 33**

Report of the Deputy Leader and Cabinet Member with responsibility for Economic Development, and the Assistant Cabinet Member for Economic Development

**6 East Suffolk Council Engagement and Position during the Examination and Post Examination Process for ScottishPower Renewables East Anglia One North and East Anglia Two Offshore Windfarm Proposals ES/0610**

**34 - 61**

Report of the Deputy Leader and Cabinet Member with responsibility for Economic Development

**7 East Suffolk Citizens Advice Review ES/0611**

**62 - 123**

Report of the Cabinet Member with responsibility for Communities, Leisure and Tourism

**8 Temporary Accommodation Procurement and Placement Strategy 2021-23 ES/0612**

**124 - 152**

Report of the Cabinet Member with responsibility for Housing

**9 Fees and Charges for 2021/22 ES/0613**

**153 - 235**

Cabinet Member with responsibility for Resources

	<b>Pages</b>
<b>10 Council Tax Base 2021/22 ES/0614</b>	<b>236 - 250</b>
Report of the Cabinet Member with responsibility for Resources	
<b>NON-KEY DECISIONS</b>	
<b>11 Capital Programme for 2021/22 to 2024/25 including Revisions to 2020/21 ES/0616</b>	<b>251 - 267</b>
Report of the Cabinet Member with responsibility for Resources	
<b>12 Exempt/Confidential Items</b>	
It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraphs 1, 2, 3 and 5 of Part 1 of Schedule 12A of the Act.	

## Part Two – Exempt/Confidential

	<b>Pages</b>
<b>13 Exempt Minutes</b>	
<ul style="list-style-type: none"> <li>Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> </ul>	
<b>KEY DECISIONS</b>	
<b>14 Approval to enter into Legal Agreements with Landowners related to the Lowestoft Flood Risk Management Project</b>	
<ul style="list-style-type: none"> <li>Information relating to any individual.</li> <li>Information that is likely to reveal the identity of an individual.</li> <li>Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> </ul>	
<b>15 Leisure Operator - Contract Award</b>	
<ul style="list-style-type: none"> <li>Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> <li>Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.</li> </ul>	
<b>16 Temporary Staff Framework Procurement</b>	
<ul style="list-style-type: none"> <li>Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> </ul>	

Close



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Minutes of a Meeting of the **Cabinet** held via Zoom, on **Tuesday, 1 December 2020** at **6:30pm**

**Members of the Cabinet present:**

Councillor Norman Brooks, Councillor Stephen Burroughes, Councillor Maurice Cook, Councillor Steve Gallant, Councillor Richard Kerry, Councillor James Mallinder, Councillor David Ritchie, Councillor Craig Rivett, Councillor Mary Rudd, Councillor Letitia Smith

**Other Members present:**

Councillor Paul Ashdown, Councillor David Beavan, Councillor Peter Byatt, Councillor Tony Cooper, Councillor Linda Coulam, Councillor John Fisher, Councillor Mark Jepson, Councillor Ed Thompson, Councillor Caroline Topping, Councillor Steve Wiles

**Officers present:** Stephen Baker (Chief Executive), Karen Cook (Democratic Services Manager), Cairistine Foster-Cannan (Head of Housing), Teresa Howarth (Principal Environmental Health Officer), Andrew Jarvis (Strategic Director), Nick Khan (Strategic Director), Matt Makin (Democratic Services Officer), Sue Meeken (Political Group Support Officer (Labour)), Brian Mew (Interim Finance Manager), Agnes Ogundiran (Conservative Political Group Support Officer), Nicola Parrish (Infrastructure Delivery Manager), Lorraine Rogers (Deputy Chief Finance Officer), Deborah Sage (Political Group Support Officer (GLI)), Ben Woolnough (Major Sites & Infrastructure Manager)

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**1 Apologies for Absence**

Apologies for absence were received from Councillor Alison Cackett.

**2 Declarations of Interest**

There were no declarations of interest.

**3 Announcements**

The Leader of the Council referred to the end of Covid-19 "lockdown" approaching and the fact that a new phase of the fight against Covid-19 would begin on 2 December 2020, with Suffolk moving into tier two. The Leader stated that it was incumbent upon all members, as councillors and community leaders, to do all possible to assist the public in ensuring that they complied with the guidance and regulations that would be in place.

**4 Minutes**

**RESOLVED**

That the Minutes of the Meeting held on 3 November 2020 be agreed as a correct record and signed by the Chairman.

## **5 Community Infrastructure Levy Spending and Reporting**

Cabinet received report **ES/0572** by the Cabinet Member and the Assistant Cabinet Member with responsibility for Planning and Coastal Management

The Assistant Cabinet introduced the report, firstly stating that in September 2019, the Community Infrastructure Levy (CIL) Regulations placed a new requirement on councils that received and spent developer contributions to produce an Infrastructure Funding Statement (IFS) and publish the first IFS on their websites by 31 December 2020. This comprehensive document must contain the Infrastructure List, the CIL Report and the Section 106 Report. An additional report on RAMS (Habitats Mitigation) was also provided for transparency on the East Suffolk Council (ESC) website.

The CIL Spending Working Group of ESC had reviewed the IFS and the Cabinet report contained a recommendation for the IFS to be approved for publication.

Since approval of the CIL Spending Strategy, the CIL Spending Working Group had met twice to review the operation of the CIL Spending Strategy because of the need to adapt arrangements due to the impact of Covid-19 on the ability of statutory partners, such as Health and Education, to review and prioritise their infrastructure projects for delivery.

The Group had also reviewed, the Assistant Cabinet Member reported, the collaborative bid from the Ipswich and East Suffolk Clinical Commissioning Group to extend and improve the general practice at Little St Johns Street in Woodbridge. The CIL Working Group recommend this bid be approved, as detailed in the Cabinet report.

The Cabinet report contained two further recommendations in relation to revision of the CIL Spending Strategy, to give clarity around the revised timeline and to facilitate “in principle” bid approvals where those were bids for CIL funding that would normally gain approval once fully valid (i.e. they were only held back because of delays with planning permission or another rectifiable matter).

Regular meetings had been held between officers and statutory partners as part of the annual review of the Infrastructure List – infrastructure projects, delivery timescales and funding arrangements. This review continued and fed into the 2020/21 Infrastructure Funding Statement. More CIL bids were in the pipeline and expected to be received by 30 November 2020.

Upon approval of the IFS, the Assistant Cabinet Member concluded, it would be available on the dedicated CIL pages of the ESC website. Alongside the easy to read CIL guidance already produced and published, a clear webpage summary of the IFS and its purpose would be provided. Commentary on the IFS would be included in the Planning Newsletter and as part of regular Planning Parish Forums.

The Leader of the Council stated that this was a very important paper and one that would be key for a number of initiatives across the East Suffolk District; he commented

that East Suffolk councillors would benefit from bespoke training / development in respect of the understanding of the requirements and regulations in respect of CIL; he asked for this to be facilitated and suggested that it could be videoed and placed on the East Suffolk you tube channel. The Cabinet Member with responsibility for Customer Services and Operational Partnerships suggested that similar sessions be organised for town and parish councils. Officers, commenting in respect town and parish councils, confirmed that a number of training sessions had already been held. Currently, officers were meeting with some of the market towns and larger villages where they knew that growth was taking place and providing sessions on potential CIL income and what the spending demands would be tied to the growth. A councillor session would be organised for early 2021.

The Cabinet Member with responsibility for Housing commented that he was in contact with the Practice Manager at Howard House Surgery in Felixstowe and they had plans to expand; he hoped that Howard House would soon submit their bid for CIL money.

Councillor Byatt asked if CIL funding could be lost if not used, and in response officers firstly referring to town and parish councils that received their 15% or 25% portion of neighbourhood CIL, confirmed that they had five years from the date of receipt in which to spend that money. If the money could not be spent locally then the District Council would claw it back but would aim, wherever possible, to work with the town or parish council to spend it on infrastructure in that area. In respect of district CIL, once received, it sat within the relevant account until spent.

In response to a question from Councillor Byatt in respect of education funding matters, officers referred to the Local Plan and said that at the point that it was developed ESC consulted with all statutory partners and Education put forward their proposed school extensions. At the time of delivery of the infrastructure that was based on decisions around catchment areas, the number of pupils etc, those figures fluctuated and so the projects that were proposed in the Local Plan were not necessarily the projects that were coming forward. As such, it was under constant review.

In response to a question by Councillor Byatt relating to access to the document, it was confirmed by officers that the document, for now, would be hosted as a PDF on the Council's website but, currently, the Exacom system was being created and this would host all of the CIL and Section 106 management, and this would have a public facing module to it which would put all of the data in a live data base that could be accessed by the public who could then see the CIL income and what was being spent etc.

The Leader welcomed the introduction of the Exacom system, stating it would provide instant, up to date, information.

Councillor Topping welcomed the training session that had been suggested by the Leader and then asked for clarification as to whether CIL would replace Section 106. Officers explained that the original intention was CIL would replace Section 106; however, it was explained that Section 106 would always be needed for things like securing affordable housing and other more restricted requirements on developments. When CIL was first introduced it was expected that "double dipping"

would be avoided, ie spending money on delivering infrastructure through Section 106 and collecting CIL on it; however, in 2019 the Government changed the rules slightly and there was now much more flexibility in terms of what could be done through Section 106 and what could be funded through CIL. It was explained that, in general, for the vast majority of development, CIL was collected primarily. However, there would be instances, particularly on large sites and some garden neighbourhoods, where ESC would have to rely on Section 106 for more infrastructure delivery. This would provide greater certainty.

There being no further questions or debate the Leader of the Council moved to the recommendation in the report.

On the proposition of Councillor Ritchie, seconded by Councillor Smith, it was by a unanimous vote

## **RESOLVED**

1. That the Infrastructure Funding Statement be approved for publication.
2. That the amendments to Section 8 of the Community Infrastructure Levy Spending Strategy be approved.
3. That the additional sentence to Section 9 of the Community Infrastructure Levy Spending Strategy to allow for the implementation of “in principle” recommendations by the Community Infrastructure Spending Working Group and decisions by Cabinet be approved.
4. That the Community Infrastructure Levy bid for funding for expansion of and enhancements to Little St John’s Street GP Surgery in Woodbridge be approved.

## **6 Draft Medium Term Financial Strategy**

Cabinet received report **ES/0573** by the Cabinet Member with responsibility for Finance who, before presenting his report, paid tribute to officers for the immense amount of work that they had undertaken during the last few days, since the Chancellor's statement, and Councillor Cook drew members' attention to the additional Appendix B to the report which had been published at a late stage.

Councillor Cook reported that the Medium Term Financial Strategy (MTFS) provided a baseline forecast of income and expenditure and looked at the overall financial climate, including public finances and the local government financial environment.

At the end of the 2021/22 budget process, in February 2021, the Council would be required to approve a balanced budget for the following financial year and set the Band D rate of Council Tax. The report set out the context and initial parameters in order to achieve that objective and contribute towards a sustainable position.

In the MTFS, the key uncertainties over this period related to Covid-19 and the proposed reforms to the Local Government finance system – Business Rates Retention and the Fair Funding Review. Both had now been deferred by a further year until 2022/23.

On 21 October the Government announced that it would be issuing a One-Year Local



Government Financial Settlement for 2021/22, which was now expected in the week commencing 14 December.

The draft MTFS for this period was attached as Appendix A. The draft MTFS would be continually revised with updates including those resulting from further budget monitoring forecasts and the provisional Local Government Finance Settlement.

Referring to Business Rates, the Cabinet Member with responsibility for Finance stated that the updated MTFS now included estimates for Business Rates income and related S31 Grant in Section 4.15 of the report. The position on Business Rates for 2021/22 was extremely uncertain due to Covid-19 impacts. This would be reviewed again following the Provisional Finance Settlement and preparation of the NNDR1 returns.

East Suffolk was in an advantageous position under the current Business Rates Retention system and deferral of the reforms would enable the Council to benefit from another year of the current regime. This was estimated to constitute a financial benefit of £3.3 million to the Council in 2021/22.

Referring to the Council Tax Base, the Cabinet Member with responsibility for Finance stated that there was considerable uncertainty at the present time regarding the Council Tax base for next year and a cautious approach had been taken to the estimates included in the updated MTFS.

As a result of Covid-19, there was likely to be a larger-than-normal deficit on the 2020/21 Collection Fund for both Council Tax and Business Rates. New regulations had been introduced for the repayment of collection fund deficits arising in 2020/21 to be spread over the next three years rather than the usual period of one year.

Section 6 summarised the forecast position on the Council's Reserves and Balances. The table in Section 6.8 did not include use of reserves to address the updated budget gaps as presented in Appendix A3.

Finally, Section 7 summarised the latest draft of the Capital Programme, which would be the subject of a separate report to the Scrutiny Committee on 17 December and to Cabinet on 5 January.

The one-year Spending Review 2020 was announced on 25 November 2020 and contained measures in response to the financial impacts of the Covid-19 pandemic that related to local government. Supplementary Appendix B provided an update on some of these developments and their potential impact on the Council. These measures would be outlined in more detail in further guidance and the Provisional Local Government Finance Settlement.

Although at this stage details were limited in some areas, the following new measures were all welcome developments in supporting the Council in meeting the financial challenges presented by the pandemic: Covid-19 Support Funding; extension of the Lost Income Reimbursement scheme for 3 months; Tax Income Guarantee Scheme; and Council Tax Support.

In addition, the Spending Review contained announcements regarding important

longer term economic and infrastructure initiatives including a new Levelling Up Fund and Flood and Coastal Erosion funding.

Overall, these developments, and the Council's robust reserves position should enable it to meet these challenges and develop its response to both the pandemic and the goal of financial sustainability.

The Leader stressed the importance, when looking at budgets, and this he said was stage one of a significant budget setting process, to remember that not only did the budgets impact on the Council, they also impacted on residents, council tax payers and business rates payers across the whole district. It was factual, the Leader stated, that many residents had seen a reduction in their incomes and many more were worried about their future financial security due to the pandemic situation.

The Leader stated that the Council's fight against Covid-19 would not stop ESC delivering against its ambitious plans, and nor would it prevent or stifle the delivery of vital services delivered by ESC. The Leader referred to the reserves held by the Council and said that these were put in place for a "rainy day"; that "rainy day" was apparent now, not only for councils but, more importantly, for individuals, residents and families.

The Leader asked that, as ESC moved through the budget setting process, could the Council seriously look at implementing a zero rate increase in Council Tax for residents; he appreciated that this would be the district council's proportion of Council Tax and that ESC had no influence over partner organisations. He felt that it would be a huge help to many residents if ESC could look at not increasing Council Tax for the next year; however, he appreciated that this would provide some challenges. In response, the Cabinet Member with responsibility for Finance commented that he was very mindful of the comments made by the Leader and, because of that, he and officers had undertaken a piece of work to evaluate the potential cost and what it would mean for forward planning etc. The Cabinet Member stated that he would very much like to have an aspiration of announcing at Full Council in January a Council Tax freeze for the year 21/22. However, at this stage, with so many uncertainties, that would be subject to constant evaluation throughout the process. Based on those discussions, the Cabinet Member commented, he and officers were in a position to amend recommendation number 2 to include such an aspiration.

Cabinet Members welcomed the change to the recommendation and the wish to put the residents' concerns first.

Councillor Byatt, firstly, stated that he wholeheartedly supported the suggestion of a Council Tax freeze for 21/22. Councillor Byatt referred to paragraph 2.2 of the report, and fees and charges income, and asked if, in theory, £1m had been lost. In response, the Cabinet Member with responsibility for Finance commented that, in theory, that may be the case; however, the Council, through Covid, had also made some in-house savings through, for example, travel expenses and other utilities costs. Councillor Byatt, commenting in respect of the loss, added that it would be helpful if the public knew what the Council was having to deal with if there did have to be any cuts.

The Leader, in response, commented that the projects that ESC had said that it would deliver, would be delivered; the Council would continue to deliver all services, not only that it was required to deliver, but also those that it chose to deliver. As part of the budget setting process, ESC would ensure that services and projects were not cut. The Council was making benefits from savings that had been made and, where necessary, it would use reserves to ensure that any rise in Council Tax was kept as low as reasonably possible, the ideal being zero.

Councillor Byatt referred to paragraph 4.5 of the report, and that £5.2 billion had been allocated for flood relief etc, and the reference to 25 areas. Councillor Byatt hoped that ESC was one of the 25 areas.

Finally, Councillor Byatt referred back to the comments of the Leader in respect of a 0% increase and not having an influence over others, he suggested that it would be nice to suggest to towns / parishes that they might consider this in their precepts too. Officers, in response, referred to the updated appendix presented to Cabinet and the £670m that was referred to in respect of Council Tax support nationally. More clarity was required but it was currently understood that there would be a grant to councils in support of losses due to the reductions seen in the Council Tax base and it was understood that there might be the potential to pass some funding to town and parish councils. Further detail was awaited together with the quantum of funding.

Councillor Topping referred to Appendix A4 and the reference to the allocation of Government's emergency funding; she asked if this was money that had been given to the Council due to Covid-19. It was explained that that was the case. Councillor Topping referred to the unallocated amount and asked if this would need to be returned to Government; it was explained that there was a substantial amount of money that needed to be returned in respect of the first round of grants; however, the money for the second round of grants had already been sent by Government.

There being no further questions or debate the Leader of the Council moved to the recommendation in the report.

On the proposition of Councillor Cook, seconded by Councillor Gallant, it was by a unanimous vote

## **RESOLVED**

1. That the draft Medium Term Financial Strategy attached as Appendix A of report ES/0573 be approved.
2. That it be approved that Members and officers develop proposals to set a balanced budget for 2021/22 and beyond, including a recommended freeze on the district element of Council Tax in 2021/22 subject to further evaluation and analysis.
3. That it be approved that Members and officers develop proposals to continue the support and response to the Covid-19 pandemic.
4. That the draft Capital Programme as set out in Appendix A5 of report ES/0573 be noted.

**7 Exempt/Confidential Items**

**RESOLVED**

That under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.

**8 Exempt Minutes**

- Information relating to any individual.
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).
- Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

**9 Independent Living**

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

The meeting concluded at 7:43 pm

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Chairman



## CABINET

Tuesday, 5 January 2021

### NEW BEACH HUT SITE - FELIXSTOWE

#### EXECUTIVE SUMMARY

1. This paper sets out the proposed development of the trim trail site on the South Seafront in Felixstowe into a new beach hut village, with 5 accessible, purpose-built pods, 25 traditional huts and a new toilet block, with Changing Places facilities. The existing trim trail will be moved to the current volleyball site, which will be re-landscaped and made into a more comprehensive activity park.
2. This paper seeks Cabinet approval for the proposed design. Further, to work up the detailed designs for the proposal and obtain planning consent for them. Then, to procure and award a contract for the works, and oversee the construction of the projects at both sites.
3. This paper also seeks approval for necessary form of operating model (referred to as Option 1 in the Report) for the proposed development, with the Felixstowe Town Council being asked to manage the 5 pods for hire, with the 25 traditional huts being sold to bring in a capital receipt.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	Eastern Felixstowe
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<b>Cabinet Member:</b>	<p>Councillor Craig Rivett Deputy Leader and Cabinet Member with responsibility for Economic Development</p> <p>Councillor Steve Wiles Assistant Cabinet Member for Economic Development</p>
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<b>Supporting Officers:</b>	<p>           Laura Hack            Delivery Manager            01394 444452  <a href="mailto:Laura.hack@eastsuffolk.gov.uk">Laura.hack@eastsuffolk.gov.uk</a> </p> <p>           Neil Cockshaw            Programmes and Partnerships Manager            01394 444451  <a href="mailto:Neil.cockshaw@eastsuffolk.gov.uk">Neil.cockshaw@eastsuffolk.gov.uk</a> </p>
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## **1 INTRODUCTION**

- 1.1 East Suffolk Council has been looking to develop the area known as the South Sea Front in Felixstowe and is currently building a new café at Martello Park. The South Seafront Gardens have been identified as a redevelopment site, also. With the requirement to move a number of beach huts from the in front of the Spa Pavilion area, due to beach erosion, and the subsequent consultation with beach hut owners and the Felixstowe Beach Hut and Chalet Association, it was identified that a bespoke, beach pod module would be beneficial to Felixstowe. Such a concept would allow for improved access to the facilities which this area has to offer, to both tourists and the local community alike. This would be the first project in Phase 3 of the South Sea Front development programme.
- 1.2 The original concept was to provide accessible beach huts for those in wheelchairs, or limited mobility. However, the vision has widened into a project about developing a site with the provision of enhanced facilities, accessible to as large a community as possible and attracting those who want to hire a beach hut and enjoy the resort.
- 1.3 This paper sets out the concept and business case for the development of the site, the associated infrastructure, including the pods and the 25 traditional, new beach huts.
- 1.4 The objective of the beach hut village is to create a development built to a high specification, with enhanced accessibility, so that it is level or has ramp access from Sea Road and the Prom, protection from beach material, and low maintenance landscaping. The focus of the site will be a single storey block structure constructed from SIPS (self-insulating panels) that can be split into smaller rooms or pods. The inside of each pod would be an adaptable, flexible space with a connecting partition wall which could be removed, expanding the individual pods into two pods of two or one large unit consisting of all five separate pods into one space. These features will provide the opportunity to create a space which can be hired by groups, families or, potentially, to be used as a beach classroom or seaside venue. Power and running water would be installed in the pods.
- 1.5 Over the remaining area of the site, it is proposed that there will be 25 traditional beach huts located in landscaped surroundings. These will be a standard size but will feature wider doorways and lower transitions into the huts. The site will be landscaped with wide pathways and the ornamental wall and hedge (between the Prom and the site) will be upgraded to improve access and allow for the all-important sea views.
- 1.6 To achieve this, the current trim trail will be moved from its existing site to a bespoke activity park on the current volleyball site. This area will be upgraded and will be equipped with new activity equipment. This work will be carried out in partnership with Felixstowe Town Council.

## **2 THE SITE**

- 2.1 Two potential sites were identified; these were the volleyball area and trim trail, with the latter being considered the best option due to its larger size and proximity to the adjacent carpark and events space.
- 2.2 Currently, the site is leased to the Felixstowe Town Council for the trim trail, which was installed and is maintained by them. The Town Council have stated that they are amenable to the Council moving this equipment to the volleyball area and creating a co-managed activity park.
- 2.3 The site is adjacent to a beach side concession on the southern side, also constructed from SIPS, shown below:



2.4 This site would work well to provide beach huts for local residents and tourists for a number of reasons:

- It is close to both on-road parking on Sea Road and the pay and display car park with disabled parking spaces at the leisure centre;
- 16 huts are already positioned on the beach (Prom in winter) at Pier South
- The site has access to fresh water and power;
- Any development would have sea views;
- The site adjoins the promenade allowing seating, access and amenity use without blocking views to the beach from the Prom; and
- The site is in close proximity to other amenities.

2.5 As a location for beach huts, the Council have considered this to be suitable as it will appeal to a cross section of potential users.

*Trim Trail area from different angles (Google Maps):*







### 3 THE PROPOSAL

- 3.1 The development of new beach hut sites in Felixstowe has been considered over some years. A new site was recently created at The Dip (with space for 16 new huts) and work is ongoing to find a solution for those huts that have not been able to return to the sand platforms at The Spa, due to erosion of beach materials. Hut owners at the Spa were contacted to ask where they would consider being moved to, should no solution be found. Unfortunately, although this site was given as an option, none of the 55 hut owners felt this was a choice for them, most of them wishing to remain in a location which was to the north of the Pier.
- 3.2 However, the Council sees the development of the South Seafront Area as a providing a key economic benefit. Development of the South Seafront Area is ongoing with Phase 1 being the refurbishment of the Victorian shelters, Phase 2 being the building of the café at Martello park and Phase 3 being an upgrade of the gardens and other business development. With the ongoing issues of the public conveniences at the Felixstowe Leisure Centre (vandalism and drainage issues), bringing forward the first project of Phase 3, now, is an opportune time.
- 3.3 Plaice Architects won the tender to design the site. They are also the architects working on the seafront café at Martello Park and the Jubilee Terrace project in Lowestoft. They were given the following specification:
  - The design of the 5 pod units to be made of SIP panels
  - The positioning of the doors to ensure they are wider than standard for

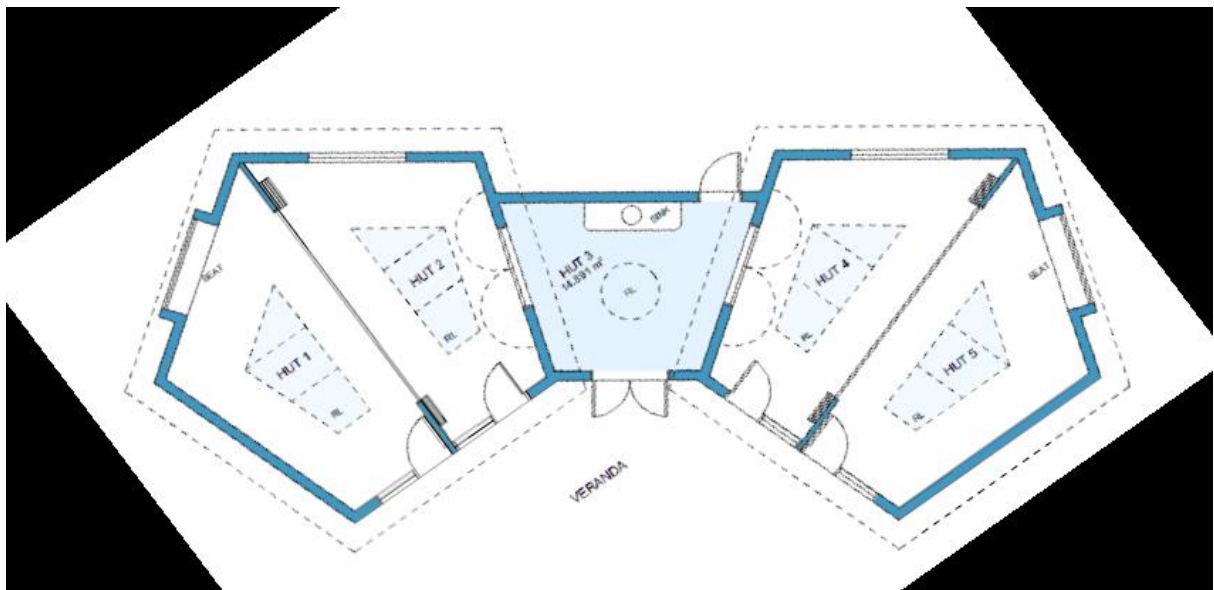
#### wheelchair access

- The internal layout of the pods, including the positioning of services – minimum of a sink, an electrical socket, some storage, seating (which can be integral), wheelchair turning space, outside seating and an access ramp, if appropriate
- Environmental and sustainable options suitable for a marine setting, such as the use of air-source heat pumps, with the design for the modular pods and toilet block
- The replacement of the seaward facing hedge with a structure that maximises on views, while offering protection from wave action and beach material.
- The use of recycled materials as much as possible, for example for pathways
- The pedestrian flow through the site, with pathways offering accessibility to the SIP module building, toilet block and low-level access to standard beach huts as part of the layout.
- The number of standard beach huts which are 2.44m x 2.13m (8'x7') that can be accommodated on the site, showing the position of these to maximise income and the seaward view (whether this is direct facing, or slanting), while offering more spacing between them than the average 0.8 m and at least four metres away from the roadside sea defence wall, to discourage the public accessing the hut roofs from the wall.
- Pedestrian access to the site and through to the Prom and nearby parking
- The fact that the road facing wall is an Environment Agency sea-defence structure and should not be compromised in any way
- The positioning of the site next to the Prom, which is designated Public Highway
- The positioning of the Beach Hut Village within the setting of a conservation area
- The positioning of street furniture such as seating, bins and a standpipe for water access
- Whether additional lighting is required
- Low maintenance planting, keeping as much of the grass in place as possible

3.4 The following design has been created to meet this specification.



### Modular pod design



3.5 It is proposed that this development is programmed to commence in April 2021, with the relocation and enhancement of the trim trail to the current volleyball court site, and the work to provide the public conveniences being undertaken in the first phase, to provide facilities for the tourist season.

## 4 BEACH PODS AND TRADITIONAL HUTS (BEACH VILLAGE)

4.1 The modular pods have been designed to be accessible from the Prom, even when the front flood defences are in place. The building is adjacent to the promenade and will have ramped access. Disabled parking is available in the nearby car park and there is a ramp to the beach nearby.

4.2 The Council aims to promote these pods for use by a variety of groups of all abilities, in

conjunction with the use of newly built public conveniences with Changing Places facilities. Changing Places are fully accessible toilets designed to a certain standard with generous space and equipment. The operating model seeks to ensure that the Council retains the ownership of these pods, with them being available for hire on a short term, from either 1 day or including block bookings. The pods can be hired individually, or up to all 5 of the rooms can be opened into one space. There are many possibilities for their use, with any restrictions covered in the conditions of hire, and being subject to any planning constraints.

- 4.3 The pods will have the ability to house equipment more akin to the chalets than traditional huts, with power and water.
- 4.4 This type of structure for hire in a sea-side resort is an un-tried model, with only one other similar facility of this type being offered, which is in Bournemouth. This facility was visited as part of the research and planning for the project. This means that it has been difficult to develop a pricing model for hire of the pods. A final price will depend on the internal specifications and equipment offered and, not least, their popularity. For this reason, an initial hire fee of £60 per pod has been given, with a block booking rate for the whole site of £300-£325 (INC VAT) per day. A conservative estimate of income, based on a 50% void rate, has been calculated at £28,875 pa.
- 4.5 The pods have been positioned in such a way as to provide a sea view to the south towards the port, rather than straight out to sea, so reducing the risk that they might have their views blocked by the huts at Pier South.
- 4.6 The other 25 beach huts will be decorated in a pastel colour and will be of the same size, specification and aesthetic to ensure that the development is visually cohesive, both within the site and to the other huts in the town. However, a larger door opening will be considered, which along with a pathway, will provide for more suitable wheelchair access to these huts.
- 4.7 The traditional huts, if sold, will be subject to the same 3-year licence terms as other huts in Felixstowe (Appendix A).
- 4.8 The concept design does not currently show internal fittings and fixtures; however, it will be necessary to fit out the pods, internally, and any other huts to be used on a short-term hire basis. This has been budgeted for within the construction estimates.
- 4.9 Green aspects of the design and construction are being developed, with thought being given to:
  - • Solar roof panels
  - • Air source heat pumps
  - • Solar water preheaters
  - • LED energy saving lights with a PIR sensors
  - • Low energy hand dryers

## **5 PUBLIC CONVENIENCE BLOCK**

- 5.1 The provision of existing public convenience within the resort has been stretched over 2020. There have been issues of vandalism and ongoing blockages at the nearby Leisure Centre facilities, meaning that the hours of operation are shorter to deter anti-social behaviour and they are only open between April and October for the same reason. or the facilities have had to be closed. This has led to complaints from nearby business

owners about the public attempting to use their facilities, but without using their services. Norse advise that a contractor had to attend the site to deal with blockages approximately once a month during the season and that there were 2 to 3 additional issues to be dealt with per month for various other reasons, costing an additional £5K per annum on top of the maintenance charges included in the Council's partnership agreement with Norse. The facilities in this location are both based under sea-level and connected to the Leisure Centre's system. Both issues mean that blockages occur more frequently and are harder to deal with, which has led to further costs incurred by the Council and, at times, the closure of leisure facilities. The cost to unlink the system is unrealistic and unviable, particularly with future plans being considered for the site. Building a new facility in a nearby location, such as at the beach hut village, will alleviate these issues, provide facilities across the whole year (rather than seasonally) and the additional cost of all-year round cleaning can be balanced against the current additional maintenance costs.

- 5.2 The design for the public convenience block is currently under discussion, but it is proposed that the site has toilets for men, women and disabled persons, together with Changing Places provision. The external design will reflect that of the modular pod building and the public conveniences will be easily reached from the Prom and the adjoining car park. Whilst the toilets will be within the village site, the landscaping will provide separation from the huts, but with a view to minimising the risk of vandalism.

## **6 ACTIVITY PARK**

- 6.1 In developing the beach village there is a requirement to relocate the existing trim trail/outdoor gym equipment to a site further south, along the prom. As part of this move, the existing equipment will be upgraded and additional facilities installed to create an activity park. This will include a petanque piste, which is very popular in East Suffolk. (Felixstowe has a current well used petanque piste at Brackenbury sports centre). Other proposed facilities include:
- concrete table tennis tables
  - accessible picnic benches
  - chess tables
  - outdoor space for workouts
- 6.2 As at the beach village site, the existing hedge between the Prom and the site will be removed to open up the space and encourage use, with the current ornamental wall being modernised. The site will also be landscaped. Consultation has been carried out with Felixstowe Town Council who support the move and new proposals. They wish to work in partnership with the Council to deliver this. This site was selected for the activity park as it is currently an underutilised leisure space, once housing a volleyball court



- 6.3 There is opportunity to access external funding for this space.

*Active Space area (from Google Maps):*



*Initial design proposal for Activity Park*



## 7 COST OF CONSTRUCTION

7.1 A budget cost for construction has been developed, based on drawings prepared by Plaice. The budget estimate is detailed below together with some additional contingency built into the figures:

<b><u>DESIGN</u></b>				
<b><u>Professional fees</u></b>		Structural Engineer	£ 7,400.00	
		Architect	£ 19,500.00	
				£ 26,900.00
<b><u>Preliminaries</u></b>				
		Contractor Preliminaries including planning and design fees	£ 116,346.00	
<b><u>CONSTRUCTION COSTS</u></b>				
<b><u>Beach Village</u></b>				£ 116,346.00
		Site clearance	£ 7,000.00	
		Groundworks	£ 172,420.00	
		Superstructures	£ 467,800.00	
				£ 647,220.00
<b><u>Activity Park</u></b>				
		Site clearance	£ 2,400.00	
		Groundworks & equipment	£ 51,310.40	
				£ 53,710.40
Overhead Contribution	7.00%			£ 59,092.35
Contingency	10.00%			£ 90,326.87
Total Contract Sum				<b>£ 993,595.62</b>

7.2 In addition to the cost of construction, there will be one-off or annual costs relating to the site. These have been estimated below:

- Business Rates at circa £480 per traditional beach hut per annum on those that are retained to hire out, based on comparative figures for other huts in Felixstowe and circa £1600 for the beach pod building.
- Insurance:
  - £845 for fire, flood and vandalism of the pods and beach huts (if retained) pa

- Utilities for modular pods– approx £500 pa
- Maintenance/statutory compliance:
  - Pods – approx £1,000 pa
  - Beach huts if retained – approx £200 per hut per annum
- Management / cleaning
  - Short term hire management cost – 50% of income
  - Agency fees for sale of traditional huts - £400 per hut

## **8 BEACH HUT MARKET**

- 8.1 The Council has liaised with a Chartered Surveyor to help understand the beach hut market across the District.
- 8.2 This paper has been written at the time of the coronavirus pandemic and, therefore, assessing the state of the tourism and holiday industry is difficult; there are travel and quarantine restrictions which make overseas travel more complicated and it is unknown as to when restrictions will be lifted and what the economic impact on the tourism industry will be. However, the Council is able to look back at former trends to help predict the impact. In the years that followed the 2008 financial crisis, the domestic “staycation” market saw a huge boost in popularity and fuelled significant growth in the sector.
- 8.3 The beach hut market within the District can be supported by general tourism statistics for 2019 which have been released by East Suffolk Means Business <https://eastsuffolkmeansbusiness.co.uk/wp-content/uploads/2020/09/Economic-Impact-of-Tourism-East-Suffolk-Report-2019.pdf>). The report shows nearly 12.5m trips to the District with an associated spend of just over £43m. The report indicates that tourism within the District continues to increase. It shows an increase in overall trip expenditure and local business turnover supported by tourism. This is supported by volume and value studies which, in recent years that show continuing growth of the visitor economy and tourism sector across East Suffolk and its Areas of Outstanding Natural Beauty.
- 8.4 The tourism statistics combined with the recent move towards staycations would indicate demand for beach huts is likely to continue. In addition to general market principles, we are aware that within the District, waiting lists for beach huts have increased, with there being 100 people on the list for Sizewell, and more than 350 people on the list for Lowestoft. We have also seen prices rise. Pre-Covid, the average sale price for a hut in a premier location in Felixstowe was £17,250. However, this has increased, with sales of huts reaching £30,000+ in some premier locations. For every sale and application for a new licence, the Council charges an administration fee of circa £600 including Vat (2019/20). There is no formal waiting list kept, but the Council receives regular enquiries about the purchase and rent of beach huts.
- 8.5 The Council tested the market in 2018/19, with the positioning of 8 new huts at The Dip. These sold for £18K each inc. Vat, in the space of a few weeks. A further 6 huts (the remaining unused sites at the Dip) are on order for 2021 and there has already been interest registered from a number of potential buyers.
- 8.6 Therefore, it would appear that beach hut demand seems constant; they change hands easily and regularly. The recent pandemic has encouraged staycations and logic would suggest simple, less expensive, self-sufficient stay at home holiday options will be



considered by more people. The current housing market 'bubble' for properties in coastal areas is transferring to beach hut values, too. In January this year, a local estate agent estimated beach hut values (with a sea view) for this premier location at circa £18k. This has now been reassessed at circa £27,000.

## **9 PROPOSED OPERATING MODEL**

- 9.1 To determine the most practical and financially viable operating model, an options appraisal has been used for this development. It has produced three options. Each model sees the retention of the 5 pods by the Council, for short-term hire.

Option 1: Sale of the traditional beach huts with an annual ground rent received/hire of the pods. (Most favoured).

Option 2: A mixed tenure scheme of sale and retention of huts

Option 3: Letting of all the traditional beach huts on a short-term basis.

- 9.2 The annual income from the pods, based on a 50% void rate and weekly, rather than daily, hire is £28,875. This would be the same hire income no matter which option was chosen.

- 9.3 Option 1 delivers the most financial benefit with a capital receipt of £392,000 and a net annual income from licences of £11,197 plus the income from pod hire of £28,875. This would reduce the payback period to 15 years and significantly de-risk the construction of the site and erection of beach huts. But it does not account for the potential appreciation in the value of the huts in later years. This option also ignores the possibility of pricing out local residents, once the huts are in private ownership. However, the retention of the pods by the Council allows both local residents and tourists the opportunity to hire out a facility accessible to all. Also, there is a buoyant hire market of traditional huts in private ownership, which the Council would not be completing against, as the pods provide a different offer. The Council also receives an administration fee (currently circa £600 INC VAT), from issuing a new licence when a hut is sold.

- 9.4 Option 2 will operate a mixed tenure development through the sale of 18 beach huts to obtain a capital receipt of about £259,200 and a net annual income of £17,105 plus the £28,875 for pod hire. In accordance with the Council's financial objectives to increase revenue, retaining ownership of the 7 frontal beach huts and renting these on short term (weekly and block booking) agreements would bring in a regular income. However, this income as a mixture of licences and traditional hut hire is only circa £6K a year more than Option 1, with a much lower capital receipt. The payback for this option is 16 years but there are also additional costs in 10 years to replace the 7 hireable huts, of circa £27K and again in twenty years.

- 9.5 Option 3 is a much more financial risk to the Council. There are no capital receipts, and the net annual income is £22,850 from traditional hire and £28,875 from the pods. This takes into consideration that a 50/50 split on income with the Town Council is proposed. This is calculated on a void rate of 30% for traditional huts with a sea view and 45% void for those on the back row. With a 100% occupancy rate, the net annual income would be £51,125, but this is not a realistic occurrence, as these huts tend to be occupied for the school holidays and shoulder weeks either side, but less so in the winter months, having no heat or power. This option gives a payback period of 19 years, but a further £95K of capital will be also required in 2031 to purchase replacement huts and then again in 2041.

- 9.6 Both the sale and short-term hiring of beach huts is a standard rated supply for VAT purposes and 20% VAT would apply (or which rate is applicable at the time). It is expected that all the saleable huts will be marketed and sold within the first year of development (or a phased approach will be made depending on lead in time to order and make them).
- 9.7 Foremost, this project is one about the regeneration of the South Seafront Area, with a vision to offer a flexible facility, in the form of hireable pods, that allows families and groups to access and enjoy the beach and resort for a day, or longer. With the addition of the new public convenience block and the creation of an activity park, the project has many facets, and the key drivers are not financial. However, the ability for the scheme to be able to repay its costs should be carefully considered, when viewing the options to sell or retain the traditional beach huts. There are over 900 beach huts already in private ownership in the resort and the market is buoyant.
- 9.8 Options for the management and maintenance of the hireable aspects of the development have been reviewed and included:
- Option A - A partnership with Felixstowe Town Council
  - Option B - Using existing operational partnership services
  - Option C - Contracting with a commercial third party

Option A has been determined as the most suitable for the scheme, with the Town Council being close to site, and able to respond quickly to customer needs (particularly over weekend hires). Also, existing staffing resources are in place to undertake minor repairs and all cleaning. The Town Council are also a vested partner in wishing to support the successful development of the South Seafront Area and tourism offer. Initial discussions have proposed a pilot model of 50/50 income split on hire fees, the model to be reviewed after 18 months.

It is proposed to utilise the marketing and booking system for short term lets which was recently transferred to the Council, as part of the asset transfer from its former partner, Sentinel, and the Council will retain this role. This system is already in place and used for huts in Lowestoft.

## **10 HOW DOES THIS RELATE TO THE EAST SUFFOLK COUNCIL BUSINESS PLAN?**

- 10.1 Two of the key objectives of the East Suffolk Business Plan are to support economic growth and to ensure the financial self-sufficiency of the Council. Whilst this project is expected to deliver towards both objectives it also provides an economic development and regeneration initiative, intended as a continuation of the wider regeneration of the South Seafront tourist area. The proposal will provide an accessible facility aimed at attracting day trippers and overnight stay tourists to the seafront. The development shows a sustainable revenue income together with a capital receipt.

## **11 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 11.1 The development of the two sites can be partially funded from the 2020/21 and 2021/22 Capital Programme and partly through the 100% Business Rate Pilot Scheme. Felixstowe Town Council are also willing to discuss funding for equipment within the activity site.

## TABLE OF FUNDING

Funding Sources	
Capital Budget 2021/21 Toilet Block	250,000.00
Capital Budget 2020/21 Accessible Hut Site	495,000.00
Capital Budget 2021/22 New Beach Hut Sites	130,000.00
100% Pooled Business Rate Fund	100,000.00
Potential External Funding	25,000.00
<b>Total</b>	<b>1,000,000.00</b>

## 12 OTHER KEY ISSUES

- 12.1 This report has been prepared having considered the results of an Equality Impact Assessment Ref EQA (Appendix B). The EIA shows a positive impact on those who may have additional requirements to enjoy a day visit to the resort.

## 13 CONSULTATION

- 13.1 Consultation has been carried out with Felixstowe Town Council on the proposed plans for the site and the movement of the existing trim trail throughout the initial design stage. The Town Council has also discussed the option of a 50/50 operating model at its Assets & Services Committee in November 2020 and have confirmed their interest in working with the Council on the principle of the servicing of the accessible beach hut facility, on an initial 12-18mth trial. The adjacent local kiosk owner has been shown the plans over summer and has expressed positivity on the scheme. The concept of the new site has been discussed with representatives from the Felixstowe Beach Hut and Chalet Association during 2020. Finally, the East Suffolk Disability Forum have commented on the draft proposals of the pod element and their views have been fed into subsequent designs. As the detailed design is worked up, further consultation will be undertaken with statutory consultees.

## 14 OTHER OPTIONS CONSIDERED

- 14.1 The site was considered as a relocation facility for those huts displaced at the Spa. However, as there is an ongoing project to attempt to re-house these on the beach and, in consultation with Spa hut owners, none of them expressed an interest in moving to this location, the decision to develop this a new build site was made.
- 14.2 The site is in a conservation area, but initial discussions with Planners are positive that the proposals will add value to the South Seafront area.
- 14.3 Planning Policy SCLP12.14 Spa Pavilion to Martello Park states:

*The Council will support and promote, high intensity tourist uses in this area, with a high proportion of these to be located along the Sea Road frontage. The area has, in part, a rich Edwardian and Victorian character and any proposals will need*

*to maintain the active commercial frontage and be of a high quality design which respects the town's heritage. Proposals which actively encourage new resort experiences will be welcomed.*

*Resort related uses will be supported on the Sea Road frontage. Proposals should consider the whole site for resort related uses to provide a vibrant mix of activities. Where this is not possible or unviable there may be opportunities for residential units on upper floor or at the rear of sites.*

*Additional beach huts in this area will be limited to locations which complement the existing resort uses and do not fill the important gaps between huts.*

*The Leisure Centre and the Pier head are the focal point of tourism related activities in Felixstowe. Proposals which seek to redevelop and support this central location will be supported to ensure that the resort offers a range of high quality attractions for visitors and residents.*

*Between the Pier and the Spa Pavilion, activities which promote cultural attractions including cafes, restaurants and shops on the ground floor will be supported where they respect the Conservation Area designation and the Edwardian and Victorian heritage of the resort. Proposals which provide a link between the resort and the town centre will also be supported.*

## **15 REASON FOR RECOMMENDATION**

- 15.1 The development of the site would meet with the objectives of East Suffolk Council's Strategic Plan.
- 15.2 The recommendation to develop the site also contributes to the Council's ambition to increase tourism opportunities and facilities – in the creation of a new public convenience for the resort.
- 15.3 To assist with the financial planning of the East Suffolk Capital Programme.
- 15.4 To assist with the delivery of key themes in the Council's East Suffolk Business Plan and within the Local Plan.

## RECOMMENDATIONS

1. That Cabinet approves the concept and plans for this project and agrees that what is set out in the report forms the basis for the delivery of the beach hut village and new activity park.
2. That Cabinet approves the use of the Capital Budget of £875K and £100K from the 100% Pooled Rates funding, to take this project from the current concept design stage through to detailed design, and an application for all necessary consents for the proposed development, including planning permission, inclusive of all associated fees and charges.
3. That Cabinet gives delegated authority to the Strategic Director, acting in consultation with the relevant Cabinet Member, to procure all of the necessary contracts and agreement to enable to the construction of the development to be carried out, and to award the same on terms that best protect the Council's interests.
4. That Cabinet approves Option 1 as the proposed operating model, that is, to sell the 25 traditional beach huts and to hire the 5 pods and approves Option A for the management of the hire facilities, that is, a 50/50 income split with Felixstowe Town Council, to be reviewed in 18 months from commencement.
5. That Cabinet requests a regular update on the project to be given to the Cabinet Member with responsibility for Asset Management.

## APPENDICES

<b>Appendix A</b>	Equality Assessment
<b>Appendix B</b>	2021 licence for traditional huts

## BACKGROUND PAPERS – None

Your reference number is EQIA284627824.

## Agenda Item 5

Thank you for submitting Equality Impact Analysis (EqIA)

ES/0609

**Service area/Team conducting EqIA:** Operations

**Officer conducting the EqIA::** Laura Hack

**Officer email address::** laura.hack@eastsuffolk.gov.uk

**Responsible Cabinet Member::** Craig Rivett

**Title of project / policy / Initiative or Action relating to this EqIA::** New beach hut site Felixstowe

**Brief description of what the project / policy / initiative or action aims to achieve::** Development of the south sea front gardens, namely the current 'Trim Trial' area to house a new public convenience, 25 traditional wooden beach huts and a SIP panel building of 5 accessible pods for hire to the public. This will be set in low level landscaped grounds.

**Date of EqIA::** 15/12/2020

**Age:** Positive

**Reason for your decision:** The area has been designed for easier access with a flat pathway, access to public conveniences from the Prom and nearby car park and ramped access when the sea defences have to be put in place, so as to be a suitable walkway for all ages and abilities.

**Disability:** Positive

**Reason for your decision:** The area has been designed for easier access with a flat pathway, access to public conveniences from the Prom and nearby car park and ramped access when the sea defences have to be put in place, so as to be a suitable walkway for all ages and abilities.

**Gender reassignment:** No impact

**Reason for your decision:** Not applicable

**Marriage and civil partnership:** No impact

**Reason for your decision:** Not applicable

**Pregnancy and maternity:** No impact

**Reason for your decision:** Not applicable

**Race:** No impact

**Reason for your decision:** Not applicable

**Religion or belief:** No impact

**Reason for your decision:** Not applicable

**Sex:** No impact

**Reason for your decision:** Not applicable

**Sexual orientation:** No impact

**Reason for your decision:** Not applicable

**What evidence or data has been collated or used to support the completion of this Equality Impact**

**Analysis?:** Information from the Voluntary and Community Sector

**Please give details for Information from Voluntary sector:** Discussion and advice from the East Suffolk Disability Forum

**Do you require any information or outcome relating to the policy, project, initiative or action to be presented to the public in a different language or form and how do you propose to do this?:** Not applicable

**As a result of completing this EqIA, has the Author, Service Team, Project Manager etc. made any changes or adjustments to the Policy / Project / Initiative or Action?:** No

**Is the policy, project, initiative or action subject to equality monitoring?:** No



**EAST SUFFOLK COUNCIL**

**BEACH HUT SITES IN FELIXSTOWE**

**LICENCE AND CONDITIONS OF HIRE**

For Site ##### (Site name and number)

THIS LICENCE is made on .....

BETWEEN

(1) East Suffolk Council of East Suffolk House, Riduna Park, Station Road, Melton, Suffolk, IP12 1RT  
and

(2) Title # First Name(s) # Surname #

Address 1 #

Address 2 #

Address 3 #

Address 4 #

Address 5 #

Postcode #

1. Introduction

1.1 The Council owns land adjacent to the sea at Felixstowe and has agreed that the Licensee may erect, maintain and use a beach hut on part of that land subject to the terms of this Licence.

2. Definitions and Interpretation

2.1 In this Licence, unless the context otherwise allows or implies, the following words shall have the meanings given to them:-

Council East Suffolk Council (or any statutory successor in title taking over the functions or liabilities of the Council)

Hut The Licensee's beach hut.

Licence Fee The relevant sum\* for that year (**exclusive of VAT**) payable by the Licensee from the table below in accordance with Clause 4 below  
*\*Please note that the quoted licence fee is exclusive of VAT as the rate to be applied will be that which is applicable on the date the annual invoice is raised which may vary.*

	2021/22	2022/23	2023/24
Site Fee (excluding VAT)	#	#	#
*Oversize Surcharge Fee if applicable (excluding VAT)	#	#	#
TOTAL (excluding VAT)	#	#	#

\*Oversize Surcharge is where the site exceeds 2.13m width x 2.43m depth



Licence Period	1 April 2021 until 31 March 2024 or until the Licence is terminated in accordance with the terms given in Clause 5 below
Licensee	The person whose name and address is given at (2) above
Permitted Hours	0500 hours to 2400 hours on any day
Permitted Use	The erection and maintenance of the Hut on the Site, and use of the Hut during the Permitted Hours

Land belonging to the Council at Felixstowe

Site No. # *(hut number which is the same as the site number should be inserted here)*

At # *(site name should go in here)*

Measuring # metres wide x # metres deep

- 2.2 In this Licence, unless the context otherwise allows or implies, words in the singular include the plural and vice versa, and reference to any gender includes any other gender.

### 3. Particulars

- 3.1 In consideration of the Licence Fee, the Council permits the Licensee to use the Site for the Permitted Use during the Licence Period subject to the terms of this Licence.

### 4. Licence Fee

- 4.1 Unless otherwise agreed in writing by the Council, the Licensee shall pay the Licence Fee which includes any properly chargeable VAT subject to production by the Council of a valid VAT invoice to the Council for the Licence Period prior to 1 April of the relevant year, as set out in the table in Clause 2.1. No part of the Licence Fee for the year will be refunded save as provided by Clause 6.3 below (see also Clause 4.4 and 4.5 below).
- 4.2 If the Hut is larger than the standard hut size (see Clause 9.1.1 below), the Licensee shall pay an additional licence fee surcharge, which if applicable is included in the table in Clause 2.1
- 4.3 The hut measurements quoted on the licence are taken from information provided by existing licence holders and measurements made by East Suffolk Council. The Licensee shall be responsible for checking the measurement and reporting any discrepancy. The Council will reserve the right to have a tolerance of +/- 2cm. Any agreed changes to the sizes will be updated on the system and reflected in the next annual invoice. No refunds will be given for changes to hut sizes in the course of the year.
- 4.4 If the owner replaces a Hut that is larger than the standard hut size (see Clause 9.1.1 below) with a standard size Hut then no part of the Licence Fee for the year will be refunded save as provided by Clause 6.3 below (see also Clause 4.1). For subsequent years during the Licence Period, the Licence may be amended and a new Licence issued, subject to an administration fee with the Licence Fee recalculated to reflect the standard hut size.
- 4.5 Should the Licensee dispose of the Hut during the Licence Period, the Licensee shall be responsible for ensuring that a Change of Ownership Form (available from [www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk)) is properly completed and returned to the Council. Pending the grant of a new licence to the new owner of the Hut, the Licensee shall remain bound by the terms of this Licence. The Council shall be under no obligation to grant a new Licence to the new owner of the Hut. It will be assumed that the pro rata'd licence fee for the remaining part of the Financial Year (1 April - 31 March) will be included in the hut sale price. [The new owner will be charged an administration fee in respect of the new Licence.]

## 5. Termination

- 5.1 The Licensee may terminate the Licence at any time by giving notice in writing to the Council (to take effect forthwith unless the Licensee advises the Council of a specific future effective date).
- 5.2 The Licence shall terminate immediately: -
- 5.2.1 if the Licensee fails to pay the Licence Fee by the due date (subject to the prior written agreement of the Council to alternative payment provisions);
  - 5.2.2 upon the death or bankruptcy of the Licensee, or upon his becoming incapable by reason of mental disorder of managing and administering his property and affairs.
- 5.3 The Council may terminate the Licence at any time by giving one month's notice to the Licensee, except that termination may be forthwith and without notice: -
- 5.3.1 if the Licensee breaches any of the terms of the Licence;
  - 5.3.2 if the Council deems it necessary for safety or other reasons (in which event, if practicable and without obligation, the Council will use reasonable endeavours to offer the Licensee an alternative site).
- 5.4 Upon termination of the Licence, the Licensee (or his personal representatives) shall either:-
- 5.4.1 remove the Hut from the Site and leave the Site in a clean and tidy condition to the satisfaction of the Council; or
  - 5.4.2 enter into a new licence provided by the Council .
- 5.5 Following termination of the Licence, if Clause 5.4 is not actioned, the Council at its sole discretion reserves the right to take any of the following actions:-
- 5.5.1 to remove the Hut (and its contents, if any) from the Site;
  - 5.5.2 to store the Hut (and its contents, if any) (without liability for safe-keeping) pending disposal or collection by the Licensee;
  - 5.5.3 to dispose of the Hut (and its contents, if any);
  - 5.5.4 to sell the Hut (and its contents, if any);
  - 5.5.5 to clean and reinstate the Site;
  - 5.5.6 to recover the reasonable costs of any of the above from the Licensee or from the proceeds of sale.

## 6. Site Disruption

- 6.1 The Council does not warrant that the Site is or will remain suitable for the Permitted Use. The Licensee must rely on his own inspection. The Licensee acknowledges that the Site is in an environment that the Council cannot control and may be subject to change by storm, wind, waves, tide or other elements. The Council reserves the right in circumstances of health and safety reasons to remove the hut with immediate effect.
- 6.2 In the event that the Hut is moved by storm, wind, waves, tide, etc, the Council reserves the right to undertake any works necessary to reinstate the Site and/or to replace the Hut in its correct position within the Site, and the Licensee shall reimburse the Council upon demand the costs of such works.
- 6.3 If the Licensee is denied access to the Site by the Council through no fault of the Licensee for a continuous period exceeding 4 weeks, the Licensee may claim a pro rata refund of the Licence Fee. Any such claim must be supported by substantive facts.

## 7. Use of the Site

- 7.1 Except as set out herein, use of the Site is entirely at the risk of the Licensee and **the Licensee is recommended to take out public liability insurance**. The Licensee shall indemnify and keep indemnified the Council in respect of all damages, losses, claims, proceedings, costs, fees and expenses that may arise from the grant of this Licence including but not limited to: -

7.1.1 those arising from the death of or injury to any person on the Site (except where such death or personal injury is caused by the negligence of the Council or its employees).

7.1.2 those arising from the loss of or damage to any real or personal property on the Site.

7.2 The Licensee shall not have the use of more than one site at any time.

7.3 The Licensee shall not make any temporary or permanent alterations or structural additions (e.g. connection to electricity supply, balconies, fences, steps, ladders, etc) to the Site or its surrounding area. Any encroachment beyond the Site will be considered a trespass upon the Council's land. Should any works to the Site or its surrounding area be necessary as a result of any unauthorised action by the Licensee, the costs of such works shall be reimbursed by the Licensee to the Council upon demand.

7.4 The Licensee shall not obstruct passageways between the huts, walkways, steps or the area surrounding the Site in any way.

7.5 The Site shall be kept clean and tidy. All rubbish and refuse (including washing up water etc) shall be removed and properly disposed of.

7.6 When not in use, the Licensee's personal possessions shall be either secured within the Hut or removed from the Site. The Council shall not be held responsible in any way for the safety or security of the Licensee's personal possessions.

7.7 The Licensee shall not cause any nuisance or annoyance to occupiers of adjacent huts or to users of the surrounding area. Failure to follow the licence conditions may result in licences being terminated.

7.8 The Licensee shall not do any act, matter or thing in breach of any statute, law or byelaw affecting the Site.

## 8. Use of the Hut

8.1 The Hut shall at all times belong to the Licensee.

8.2 The Licensee shall affix the number of the Site to the front outside wall of the Hut.

8.3 Subject to any permitted temporary hiring of the Hut, as referred to in 8.4 hereof, the Hut shall be for the private use of the Licensee during the Permitted Hours only. The Hut shall not be used or occupied outside of the Permitted Hours and shall be securely locked outside the Permitted Hours.

8.4 No business use shall take place on or from the Hut or Site, provided that this shall not prohibit the temporary hiring of the Hut for non-business purposes. A notice bearing the name, address, and contact details of the Licensee may be displayed on the Hut inviting applications for its hire or sale. No other notices, advertisements, etc, shall be displayed on the outside of the Hut: any such notices shall be removed by the Council.

8.5 Should the Hut be subject to temporary hire, this shall be for non-business purposes, and is restricted to no more than 20 weeks per annum. The number of adults visiting the Hut at any one time shall not be greater than 6. It is the Licensee's responsibility to make any authorised user of the hut fully aware of the terms within the beach hut licence (in particular clause 7.7), and to ensure that these are monitored and adhered to at all times. Any breach of licence conditions may result in the licence being revoked.

8.6 The Licensee shall ensure that the Hut is at all times safe, secure, sound, wind and watertight and safely secured to the ground on such part of the Site that the Council shall specify.

## 9. Hut Specification

9.1 Unless otherwise agreed in writing by the Council, Licensee shall ensure that the Hut conforms with the following specification: -

- 9.1.1 The standard hut size is 2.13m (width) x 2.43m (depth) x 1.80m (height to eaves). If a new or replacement hut is placed on the Site, or if repairs or alterations are made to an existing standard sized hut, the Licensee shall ensure that the Hut does not exceed the standard size. No structural additions to the exterior of the Hut (e.g. connection to electricity supply, balconies, fences, steps, ladders, etc) shall be permitted.
- 9.1.2 The hut shall be placed within the Site against the right-hand boundary (when facing the sea) of the Site.
- 9.1.3 There shall be a clear space of 10 centimetres between the ground of the Site and the underside of the floor of the Hut.
- 9.1.4 The Hut shall at all times be kept in good and substantial repair and decorative order to the Council's reasonable satisfaction. The Hut shall be constructed of wood and the exterior shall be painted using good quality pastel-shade of paint or stained with a natural or coloured wood stain.
- 9.1.5 There shall be no side door to the Hut.
- 9.1.6 The Licensee shall take all necessary precautions against fire. No petrol or other inflammable substances shall be stored in the Hut other than butane gas cylinders. Where butane gas cylinders are used or stored, adequate ventilation must be provided at low level and a dry powder fire extinguisher, not less than 1 kg, shall be kept in a fully operational condition in the Hut. When not in use, butane gas cylinders shall be turned off at the main valve of the gas cylinder. Butane gas cylinders should be removed from the Hut when the Hut is not used for any period of time (e.g. during the winter months).
- 9.1.7 The ventilator or ventilators shall be constructed to the Council's reasonable satisfaction to prevent rubbish or other matter being put through them.
- 9.1.8 The written consent of the Council must be obtained prior to the replacement of an old hut with a new hut on the Site, such consent not to be unreasonably withheld.

## 10. General

- 10.1 This Licence is personal to the Licensee and is not assignable or transferable.
- 10.2 Where the Licensee is more than one person the obligations of the Licensee shall be joint and several. The Licence shall be held by no more than two named persons.
- 10.3 This Licence is not and shall not be construed as a tenancy. This Licence does not give the right of exclusive occupation of the Site and the Council reserves the right at all times for its officers, servants and agents to enter the Site for its own purposes, including inspection of the Site and of the Hut.
- 10.4 The Council reserves the right to vary the terms of this Licence at any time. Written notice of any such variation shall be sent to the Licensee.
- 10.5 Any notices to be served by the Council on the Licensee shall be deemed to be properly served if sent by pre-paid post or e-mail addressed to him at the address given above unless the Licensee advises the Council in writing of an alternative address.
- 10.6 In the event of termination, this Licence shall terminate absolutely but without prejudice to any claim the Council may then have against the Licensee.
- 10.7 Notwithstanding any other provision of this Licence, nothing in this Licence confers or purports to confer any right to enforce any of its terms on any person who is not a party to it.
- 10.8 Any dispute regarding interpretation of these terms shall be determined by the Council at its sole discretion.
- 10.9 This licence revokes and supersedes any previous licence between the Council and the Licensee in respect of the Site.

- 10.10 This Licence shall be interpreted in accordance with English Law and subject to the jurisdiction of the English Courts.
11. Special Conditions
- 11.1 *For Sites located between the Spa Pavilion Theatre and Arwela Road, Felixstowe*  
Dogs are not allowed on the beach between the Spa Pavilion Theatre and Arwela Road between 1 May and 30 September and are therefore prohibited from any Hut on that stretch of beach or its foreshore during that period.
- 11.2 *For Sites located between Arwela Road and Cobbolds Point, Felixstowe (excluding hut sites 158-207 Undercliff Road East which are permanently sited behind the Promenade)*
- 11.2.1 The Licensee shall remove the Hut at their own expense from the Site during the week of 30<sup>th</sup> September and place it neatly and without causing damage on the Promenade. Any requirements of Suffolk County Council (as the Highways Authority) must be followed in relation to consideration of the safety and convenience of other users of the promenade. The Hut shall be returned to the Site during the week of 1<sup>st</sup> April or Easter (whichever is the earlier)
- 11.2.2 Should the Licensee fail to move the Hut in accordance with the preceding sub-clause, the Council reserves the right to do so and recover the reasonable costs of so doing from the Licensee.
- 12 National Non-Domestic or Business Rates (NNDR)
- 12.1 The Licence Fee does not include NNDR which will be charged separately.
- 12.2 The Licensee shall be responsible for payment of NNDR chargeable on the Hut.
- 12.3 The Council reserved the right to exchange personal data and other information concerning use of the Hut and the Site between its NNDR and Asset Management sections and also in the case of emergencies Suffolk Constabulary.
- 12.4 Please note that, on sale of the Hut, the sale price must not include all or any part of the NNDR charge



## CABINET

Tuesday, 5 January 2021

### **EAST SUFFOLK COUNCIL ENGAGEMENT AND POSITION DURING THE EXAMINATION AND POST EXAMINATION PROCESS FOR SCOTTISHPOWER RENEWABLES EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO OFFSHORE WINDFARM PROPOSALS**

#### **EXECUTIVE SUMMARY**

1. ScottishPower Renewables (SPR) submitted two separate nationally significant applications for offshore windfarm developments off the East Suffolk coast: East Anglia One North (EA1N) and East Anglia Two (EA2). The applications were submitted in October 2019, the six-month formal Examination period for both applications began on the 7 October 2020. Both projects propose offshore export cables to make landfall north of Thorpeness and run onshore cables underground for approximately 9km. The cables terminate at a site immediately north of Friston village where the onshore substations are to be located.
2. The Cabinet, at its meeting on 7 January 2020, resolved that whilst maintaining overall support for the principle of offshore wind as a significant contributor to the reduction in carbon emissions, and for the economic opportunities it may bring to the locality, it would raise an objection to specific aspects of the proposals which have significant impacts onshore.
3. The Applicants have sought to address a number of the specific concerns and objections to the projects raised by the Council. Discussions between both parties have been ongoing regarding further information, modifications, additional mitigation and compensation which would be required in order to persuade the Council to potentially move towards a neutral position in some areas. It is now recommended that Cabinet agrees that the Council can now move towards a neutral position with regards to a number of previously raised concerns with the EA1N and EA2 proposals. However, there are still areas of disagreement with regards to noise, particularly operation noise at the substations site and the cumulative impacts of future energy development that has not yet been satisfactorily addressed. We are also still of the view that further commitments should be sought in relation to the design of the substations and in relation to cumulative impacts with future projects. We therefore

maintain significant concerns in those areas and are seeking additional work from the Applicants.

4. Cabinet is recommended to continue its support for the principle of offshore wind and move its position of objecting to the overall impact of the onshore substations of EA1N and EA2 towards a position of being neutral on both proposals having regard to the enhanced package of mitigation and compensation that the Applicants have now put forward. However, we maintain significant concerns with regard to the noise impacts of the onshore substation elements, substation design and the cumulative impacts of the proposals with future energy projects until such a time that these matters are satisfactorily addressed by the Applicants. The Council will also continue to engage with the Applicants to address areas of concerns raised within the Council's Relevant Representation and Local Impact Report.
5. Cabinet is requested to give delegated authority to the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development, in addition to the delegated authority provided at its meeting on 7 January 2020, to negotiate, resolve and agree any matters on behalf of the Council arising post-consent, should one or either of the projects be consented by the Secretary of State for Business, Energy and Industrial Strategy (BEIS).

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	Directly: Aldeburgh & Leiston,  Indirectly: Southwold, Wrentham, Wangford & Westleton, Kessingland, Kirkley & Pakefield, Harbour & Normanston, Gunton & St Margarets, Lothingland, Kelsale & Yoxford, Saxmundham
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<b>Cabinet Member:</b>	Councillor Craig Rivett Deputy Leader and Cabinet Member with responsibility for Economic Development
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<b>Supporting Officers:</b>	Philip Ridley Head of Planning and Coastal Management <a href="mailto:philip.ridley@eastsoffolk.gov.uk">philip.ridley@eastsoffolk.gov.uk</a>  Naomi Goold Senior Energy Projects Officer <a href="mailto:naomi.goold@eastsoffolk.gov.uk">naomi.goold@eastsoffolk.gov.uk</a>
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## 1 INTRODUCTION

- 1.1 The EA1N and EA2 offshore wind farms are being developed by East Anglia One North Limited and East Anglia Two Limited (referred to as ‘the Applicants’), which are wholly owned subsidiaries of SPR which itself is owned by Iberdrola, a Spanish based company. EA1N and EA2 are both defined as Nationally Significant Infrastructure Projects (NSIPs) under the 2008 Planning Act. Both projects were submitted to the Planning Inspectorate on 25 October 2019 seeking Development Consent Orders (DCO) and the applications accepted as valid on 22 November 2019. The DCOs will be determined by the Secretary of State for BEIS.
- 1.2 Following acceptance, the Applicants publicised the applications and provided a deadline of 27 January 2020 for the submission of Relevant Representations on the projects. A Relevant Representation is a summary of a stakeholder’s views on the applications in writing. The examinations were due to start in March 2020 but the Preliminary Meeting, the close of which signifies the start of the examination, had to be postponed due to Covid-19 and the public health situation. The Preliminary Meeting was rescheduled and held in two parts on 16 September and 6 October 2020, and the examinations began 7 October 2020. The examinations must conclude within a six month period, so the close of the examinations will be 6 April 2021.
- 1.3 EA1N is an offshore wind farm project located approximately 36km from Lowestoft in an area of 208km<sup>2</sup> with a potential generating capacity of 800 megawatts (approximately 710,000 households) generated by up to 67 turbines. There will be cables running from the offshore element coming ashore at Thorpeness on the East Coast and travelling westwards to connect into a new substation proposed to be constructed immediately to the north of Friston. The proposal includes a separate National Grid substation that is essential to connect into the overhead powerlines that run from Sizewell B to Bramford – north west of Ipswich.
- 1.4 EA2 is an offshore wind farm project located approximately 33km from its nearest point to the coast, Southwold, in an area of 218km<sup>2</sup> with a potential generating capacity of up to 900 megawatts (approximately 800,000 households) generated by up to 75 turbines. As above, there will be cables running from the offshore element coming ashore at Thorpeness on the East Coast and travelling westwards to connect into a new substation proposed to be constructed immediately north of Friston. The proposal similarly includes a separate National Grid substation that is essential to connect into the overhead powerlines as above. However, each project must apply for the National Grid substation in order to connect into the overhead powerlines but only one National Grid substation will be constructed should both DCOs be consented.



- 1.5 Each project will have their own separate substation alongside the National Grid substation. The proposals assess different scenarios for construction including the projects being constructed simultaneously or consecutively.
- 1.6 East Suffolk Council is working very closely with Suffolk County Council on these projects.
- 1.7 Under the Climate Change Act 2008, UK Government set a 2050 target to reduce CO<sub>2</sub> emissions by 80%, in June 2019 new legislation was signed that commits the UK to a legally binding target of net zero emissions by 2050. Clean growth is at the heart of this aim and supporting and promoting renewable energy over older and dirtier energy resources is a key component of the plan. The Offshore Wind Sector Deal includes an ambition for offshore wind to deliver 30GW of generating capacity by 2030, but the UK Government has pledged to increase the sector's 2030 goal to 40GW. The Climate Change Committee identified that 75GW of offshore wind capacity would be needed by 2050 to achieve net zero emissions. The Prime Minister also set out recently in his ten point plan for a Green Industrial Revolution, the ambition that the UK will produce enough offshore wind to power every home, quadrupling how much we produce and supporting up to 60,000 jobs. The ten point plan and newly published Energy White Paper both reaffirm the commitment to 40GW by 2030 and illustrate the ambition for a cleaner, greener future for this country.
- 1.8 We recognise the significant contribution East Suffolk will make towards these ambitions by virtue of its geographical proximity to advantageous offshore seabed conditions, and strategic onshore electrical infrastructure. We also recognise the importance of this industry economically to local ports and the towns of Lowestoft and Great Yarmouth.
- 1.9 A report was taken to Cabinet on 7 January 2020 to seek delegated authority to enable the Council to fully engage with the examinations. The report provided a summary of the main concerns in relation to the projects and set out the Council's position, a draft Relevant Representation and early draft Local Impact Report were attached. The recommendations agreed by Cabinet have been set out below:

**RECOMMENDATIONS AGREED BY CABINET ON 7 JANUARY 2020**

1. That Cabinet grants the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development authority to fully engage with the Pre-examination and Examination stages of the Development Consent Order process in relation to EA1N and EA2 offshore wind farm projects. This will include:

- Submission of Written Representations to expand upon the Relevant Representation where necessary,
  - Submission of Statements of Common Ground between the application and the Council,
  - Attending/authorising technical officers to participate at Preliminary Meetings/hearings/accompanied site visits,
  - Responding to Examining Authority's questions and requests for further information,
  - Commenting on other interested parties' representations and submissions as appropriate,
  - Signing planning obligations if required.
  - Any other requirements not yet identified.
2. That the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development be authorised to make amendments to the draft Relevant Representation and early draft Local Impact Report as agreed with appropriate representatives of this Council prior to their submission to PINS.
  3. That following agreement by the Cabinet of East Suffolk Council, the draft Relevant Representation set out in Appendix A and summarised below, subject to any agreed amendments, be submitted to PINS.
  4. That PINS is informed by the Relevant Representation that East Suffolk Council recognises the national benefit these projects will bring in meeting the renewable energy targets and creating sustainable economic growth in Suffolk provided this is achieved without significant damage to the local built and natural environment, local communities and tourist economy. Notwithstanding this, the Council has significant concerns on the following matters:
    - Landscape and Visual Effects
    - Noise
    - Design and Masterplan
    - Traffic and Transport
    - Seascape and Visual Effects
    - Cumulative Impacts
    - Measures to address residual impacts of the projects

The Council also has concerns or wishes to make representations in a number of additional areas which have been outlined below:

- Socio-Economic Impacts
- Heritage
- Air Quality
- Public Rights of Way
- Flood Risk
- Ecology
- Coastal Change
- Archaeology
- Construction Management

East Suffolk Council is supportive of the principle of offshore wind development, recognising the strategic need for zero carbon energy and the contribution the industry can make to sustainable economic growth in Suffolk. This must however be achieved without significant damage to the environment, local communities and tourist economy of East Suffolk. The projects as designed to

date will result in significant impacts as set out above, particularly in relation to the environment around the substation site and significant effects on the designated landscape. Based on the current submissions East Suffolk Council objects to the overall impact of the onshore substations and raises significant concerns regarding the significant effects predicted from the offshore turbines on the Suffolk Coast and Heaths AONB.

5. That following agreement by the Cabinet of East Suffolk Council, the early draft Local Impact Report set out in Appendix B, subject to appropriate amendments, be submitted to PINS by the relevant deadline.
6. That this Council continues to engage with SPR to identify means by which the impact of the proposals can be mitigated and/or compensated if the developments do take place and seek appropriate s106 agreements to secure the necessary mitigation and/or compensation.
7. That Cabinet notes the continued work with Government, namely MHCLG and BEIS with regards to the cumulative impacts on East Suffolk of the numerous energy projects existing and forthcoming.

1.10 East Suffolk Council submitted their Relevant Representation by the appropriate deadline in January this year. The Local Impact Report was prepared jointly with Suffolk County Council and submitted at Deadline 1 (2 November 2020) of the examinations as required.

1.11 The Council continues to be supportive of the principle of offshore wind development, both in terms of seeking to reduce carbon emissions and creating sustainable economic growth in Suffolk. This includes providing for long term employment for some of our coastal communities, provided this can be achieved without unacceptable impacts to the environment, residents and the tourist economy of Suffolk.

1.12 We have continued to work with the Applicants since the submission of the applications to seek to address areas of concern and narrow the issues in dispute as is expected and appropriate during the DCO process.

## **2 PLANNING POLICY CONTEXT**

2.1 The Planning Act 2008 makes provision for National Policy Statements, which set out the policy framework for determination of NSIP applications. The three NPSs of relevance are EN-1 (Overarching NPS for Energy), EN-3 (NPS for Renewable Energy Infrastructure) and EN-5 (NPS for Electricity Networks Infrastructure). The Government has pledged within the Energy White Paper published on 14 December 2020 to review the energy NPSs by the end of next year. At the present time however, these policy statements continue to provide the relevant policy framework against which to assess these projects.

2.2 The revised National Planning Policy Framework (NPPF) published in 2019 does not contain any specific policies for NSIPs but remains a material consideration.

2.3 The new Local Plan 2020 covering the former Suffolk Coastal area was adopted by Full Council on 23 September 2020 and is now a material consideration. It includes policy

SCLP3.5 'Proposals for Major Energy Infrastructure Projects'. This policy identifies the need to mitigate the impacts arising from such developments and will be used to guide the Council. The Council's Local Impact Report provides further guidance on relevant planning policy and can be viewed using the following link <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-002816-DL1 - Suffolk County Council - LIR.pdf>. It should be noted however that NPS's will usually over-ride local planning policy.

- 2.4 It is clear, as set out in paragraph 1.7, that the UK Government considers that offshore wind has a significant role to play in not only helping to deliver net zero ambitions but also in the economic recovery post Covid-19. There is therefore clear Governmental support for the delivery of offshore wind projects.

### **3 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?**

- 3.1 The East Suffolk Strategic Plan 2020-2024 recognises the energy sector as a key sector for East Suffolk and identifies renewables energy as a key priority.

### **4 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 4.1 SPR are funding the Council's officers through an agreed financial arrangement which involves the charging of SPR for officer time on an hourly basis. We also work closely with other partners including Suffolk County Council and engage with other statutory bodies to ensure we fully address all aspects of the development. East Suffolk Council will be taking the lead during the Examination in areas that we are the responsible authority for including design, heritage, conservation, coastal management, tourism, noise and landscape. Suffolk County Council will be leading on highways matters including public rights of way as part of their responsibility as the Local Highway Authority, local flood risk and drainage matters as part of their responsibility as the Lead Local Flood Authority and in relation to archaeology, emergency planning and public health.

### **5 OTHER KEY ISSUES**

- 5.1 This report has not carried out an Equality Impact Assessment, as this Council is a statutory consultee in the NSIP planning process, it is the responsibility of the Applicants to carry out an Equality Impact Assessment.

### **6 CONSULTATION**

- 6.1 The Council has not carried out its own formal consultation with town and parish councils and we are not obliged to do so by the NSIP process. There are a number of action groups formed in relation to the proposals and we have engaged with them where we

have been able to. We have also undertaken internal consultation with technical officers and continued to engage with other relevant external stakeholders.

## **7 PROPOSALS**

- 7.1 The previous Cabinet report on 7 January 2020, in summary, proposed that the Council is supportive of the principle of offshore wind development, provided this can be achieved without significant unacceptable damage to the environment, residents and tourist economy of Suffolk.
- 7.2 The Councils however considered the projects as designed at that time would result in unacceptable significant impacts, particularly in relation to the environment around the substation site and significant effects on the designated landscape without sufficient mitigation or compensation proposed. Based on the submissions at that time, the Council objected to the overall impact of the onshore substations and raised significant concerns regarding the significant effects predicted from the offshore turbines on the Area of Outstanding Natural Beauty (AONB). The Council also highlighted a number of other concerns in relation to the impacts of the developments.
- 7.3 In order to address some of the Council's concerns a package of mitigation measures and compensation measures have been proposed by the Applicants. These have been carefully assessed with regards to the potential improvements and mitigatory and compensatory measures that could be achieved if the proposals are accepted by the Council. The report details these measures. At the end of this section there are tables which summarise the package of measures/funds that were proposed ahead of the Examinations commencing (Paragraph 7.84, Table 1) alongside the enhanced offer that has now been presented by SPR (Paragraph 7.87, Table 2).

### Offshore Elements

- 7.4 The Applicants identified through the Seascape and Landscape Visual Impact Assessment (SLVIA) that the offshore infrastructure associated with EA2 alone and in combination with EA1N, will result in significant adverse landscape and visual effects on the character and special qualities of the AONB. The offshore turbines will have a significant and long-term negative impact on the nationally designated landscape. The horizon and sea views along this coastline are largely uncluttered and as such contribute to the character of place and setting of the AONB and Heritage Coast.
- 7.5 The Council did not consider at the time of preparing the Cabinet report, that the Applicants had demonstrably exhausted all reasonable mitigation measures in terms of the design of the schemes, including the turbine heights. Following further review and engagement with the Applicants and Natural England, it has also been accepted that

EA1N will not contribute significantly to the cumulative effects on the AONB with EA2 and therefore further mitigation to EA1N cannot be justified.

- 7.6 It should be noted that the principal consultee in respect of the impacts of the developments on the AONB and their significance is Natural England and therefore we will ultimately be deferring to Natural England on this matter.

#### *New Mitigation/Compensation Measures – Offshore*

- 7.7 The Applicants have committed to a reduction in the maximum height of the turbines proposed for both projects from 300m to 282m. This is a welcomed revision which will help to reduce the impacts of the projects.
- 7.8 In addition to the reduction in the maximum height of the turbines of both projects, the Applicants accept that residual impacts as a result of EA2 on the AONB will remain and that these cannot be fully mitigated. In response and as a result of engagement with the Council, the Applicants have proposed a compensatory fund which will support the delivery of measures to offset the harm caused to the AONB. The fund provides £465,000 for measures to support access, environmental and ecological enhancements to the AONB.
- 7.9 The compensation would be utilised to fund projects which seek to strengthen the existing qualities of the AONB. Although the Council consider that further mitigation measures to the layout and height of the turbines of EA2 remain possible, and this is a view we will express during the examination, we accept that a fund provides a level of compensation for the identified residual impacts.

#### Onshore Elements

- 7.10 The projects share the same Onshore Order Limits and therefore the impacts of the projects have been discussed together below. The report will now seek to outline what issues were raised in the previous Cabinet report and what measures the Applicants have proposed to address them.

#### Substation Site

- 7.11 The Council raised an objection to overall impact of the onshore substations. Based on the information available at the time, the Council raised significant concerns in relation to the onshore substation infrastructure associated with EA1N and EA2 and their impacts on landscape and visual amenity, noise, design, cumulative impacts and the level of mitigation/compensation proposed. In addition, the Council raised concerns regarding heritage, public rights of way and flood risk. Collectively, when these areas of concern were taken together, it was considered that they would have a significant adverse impact

on the environment around the substation site. The mitigation proposals presented at the time did not satisfactorily address the concerns raised.

- 7.12 The Council has been engaging with the Applicants to seek positive changes to the design of the substations in addition to measures to strengthen the mitigation and compensation measures provided in relation to the substations site.

#### *Landscape and Visual Amenity*

- 7.13 The impacts of the substations and National Grid connection infrastructure on landscape and visual amenity was highlighted in the Council's Relevant Representation as a significant concern. The projects will result in significant visual impacts and permanent change to the character of the landscape at the substations site, including the surroundings and amenity of the village of Friston.
- 7.14 There is also a concern that the Applicants have not fully understood the impact on the character and significance of the historic landscape character. The Council has therefore requested that further assessment is undertaken in relation to this.
- 7.15 The effectiveness and timeliness of the proposed mitigation planting was expressed as a concern as the assumed growth rates are not considered reasonably likely to be achieved in the local conditions. Concerns have also been expressed regarding the degree to which the visualisations accurately represent the mitigation planting at year 1 and 15 post construction. The year 1 visualisations included unsecured early planting and some of the year 15 images showed planting, trees and vegetation of a significantly greater maturity than the 15 years growth specified. The Council has been engaging with the Applicants to address these concerns and requested updated visualisations be provided.
- 7.16 The Council has continued discussions with the Applicants regarding the representation of the planting within the visualisations. The Applicants have now provided a selection of updated visualisations which provide a more realistic depiction of the proposed mitigation planting at year 15, early planting has also been removed from the images. The Applicants have also committed to the provision of further mitigation planting at the substations site and provided more information regarding the location of early planting which is detailed in the Outline Landscape and Ecological Management Strategy (OLEMS). In order to help address the concerns regarding the proposed growth rates and timeliness and effectiveness of the mitigation, in addition to early planting, the Council has requested the Applicants commit to more adaptive and dynamic programme of planting aftercare and maintenance. The Applicants confirmed this commitment at Deadline 3 of the examinations.
- 7.17 As the Landscape and Visual Impact Assessments (LVIAs) identify significant residual impacts on the landscape character and visual amenity, the Council has requested that offsite planting is provided. Offsite planting should be provided in strategic locations to reinforce field boundaries and public rights of way in the locality. A mechanism to provide funding for this additional planting has now been agreed.

- 7.18 In addition to seeking further mitigation planting the Council has been engaging in positive discussions with the Applicants to secure further embedded mitigation in the form of reductions in the size and scale of the substation infrastructure. Commitments to such reductions were secured at Deadlines 2 and 3 of the examinations and will be highlighted within this report.
- 7.19 The long term management of the site has also been highlighted as a concern as insufficient information was provided in the Environmental Statements to detail how this will be managed for the lifetime of the site's operation. The Council will continue to engage with the Applicants to seek appropriate commitments in this regard.

#### *Noise*

- 7.20 Significant concerns were raised in the Relevant Representation regarding the adequacy of the noise assessment which it is considered underestimates the noise impacts at the substations site. The Council is particularly concerned that the Applicants assumed background noise level is an overestimate of the typical background sound levels at the receptors and therefore the setting of an operational noise rating level of 34dB set by the draft DCOs, will result in a greater significance of effect. The assessments have also not considered non-residential receptors. If consented, the projects will change the sound climate in the surrounding area on a permanent basis.
- 7.21 The Council is aware of existing and potential connection offers being made by National Grid which could result in further development in the locality. Future assessments would then be based on the 'new' sound climate including the EA1N and EA2 projects and result in continued noise creep.
- 7.22 The Council has been engaging with the Applicants to seek further information and clarifications on the modelling and it is understood the Applicants will be providing further information during the examinations. This however remains an area of professional disagreement. The Council will continue during the examination to highlight our significant concerns regarding the operational noise impact of the substations.

#### *Heritage*

- 7.23 The Council's Relevant Representation set out our concerns regarding the impact of the projects to the significance of a number of listed buildings which surround the substations site due to the impact of the developments on their setting. There is a concern that the assessments under predict the level of harm caused to a number of the assets. The projects will also result in the loss of a track/public right of way which also comprises the historic parish/Hundred boundary between Friston and Knodishall which runs directly through the middle of the proposed substations location. The Council's concerns were set out to the Examining Authority during the second Issue Specific Hearing held at the beginning of December.
- 7.24 The Council has discussed the areas of concern in relation to the assessments with the Applicants, but this remains an area of professional disagreement. It is not possible to mitigate the effects of the projects through landscaping and therefore the Council



considers that appropriate compensation is necessary. The Council will continue to engage with the Applicants to seek commitments for further reductions in the size of the onshore substations but has also secured a commitment from the Applicants to provide compensation.

#### *Flood Risk*

- 7.25 Although recent flood events in Friston are not thought to have had their origin within the proposed substations site, the information within the submissions is not sufficient to determine how the proposed development would interact with existing drainage patterns. Further information is also being sought to demonstrate there is sufficient space within the Order Limits to accommodate infiltration features in addition to attenuation features at an agreed discharge rate. Suffolk County Council as the Lead Local Flood Authority are leading on this issue during the examination. Discussions with the Applicants are ongoing in relation to this matter.

#### *Public Rights of Way*

- 7.26 The projects will result in the access network around the village of Friston being disrupted during construction and also during operation by virtue of the permanent loss of a key public footpath. The impact of the developments on the amenity and quality of the user experience of the public right of way network has not been adequately addressed. Suffolk County Council as the Local Highway Authority are leading on this matter during the examination. Discussions with the Applicants are ongoing in relation to this matter.

#### *Substation Design*

- 7.27 It is important to ensure that all reasonable endeavours have been made to minimise the scale of the substations through the exploration of opportunities for infrastructure consolidation, design refinement and potentially the use of gas insulated technology in the National Grid substation rather air insulated. There was and is still considered insufficient commitment within the submissions to ensure that the scale of the buildings and infrastructure associated with the substations will be minimised during the detailed design process if the projects are consented. This concern was highlighted within the Relevant Representation and the Council will continue to seek a firm commitment to this through the examinations.
- 7.28 The Applicants have provided an outline document which identifies the key design principles for the EA1N and EA2 substations. The Council has requested that a similar document is provided for the National Grid substation and that this infrastructure is subject of the same approval process post-consent with the local planning authority. The Applicants have agreed to this request. The Council has also requested further revisions to the outline design principles statements which we will continue to seek through the examinations.
- 7.29 The Council has also continued to engage with the Applicants seeking reductions in the overall footprint and height of the infrastructure and a commitment to take all

reasonable efforts to seek further reductions post consent during the design refinement process. The Applicants have recently confirmed a number of positive changes to the design of the onshore substations which will be detailed more fully in paragraphs 7.36-7.40.

#### *Cumulative Impacts of Future Connections*

- 7.30 The Council is aware of the two interconnectors (Eurolink and Nautilus) proposed by National Grid Ventures to be connected to the national grid in the Leiston area. It is however understood that if the National Grid substation proposed under the EA1N and EA2 projects is consented, this would be the point of connection for the interconnector projects also. In addition to the interconnector proposals, the Council has been made aware that the Five Estuaries offshore wind project (formerly Galloper Extension) was given a preliminary connection offer at the proposed substation immediately north of Friston village. This illustrates that the National Grid substation proposed within the applications is being seen by National Grid as a strategic connection point for future projects. This is without the potential impacts being cumulatively assessed, and without any of this future development being considered within the existing design considerations for the site. The Council continues to request that as a minimum the works to the National Grid substation which are necessary to accommodate the future connections should be considered in a Cumulative Impact Assessment (CIA).
- 7.31 The Applicants are of the view that their CIA is robust and in accordance with guidance and therefore have not yet committed to further work in this area. The Council highlighted the concerns regarding the cumulative impacts of future projects during the second Issue Specific Hearing held at the beginning of December and will continue to raise significant concerns regarding this matter during the examinations.

#### *New Mitigation/Compensation Measures – Substations Site*

- 7.32 As stated above, the Council has continued to engage with the Applicants to secure a more appropriate package of mitigation/compensation for the substations site. The key areas of concern have been set out above and some of the key measures to address these outlined below.
- 7.33 *Adaptive aftercare management:* The Applicants have committed to an adaptive aftercare management regime in relation to the substation mitigation planting – this will allow the aftercare period of 10 years to be suspended and measures employed if the planting did not achieve pre-set objectives. Notwithstanding the Council's position on growth rates, this measure seeks to provide the Council with greater confidence that the mitigation planting will be able to be delivered in a timelier manner. If parts of the planting suffer delayed growth or fail, the supervised aftercare period would effectively extend beyond the ten years.
- 7.34 *Additional Planting and Location of Early Planting* – The Applicants have committed to the provision of further mitigation planting at the substations site and also provided

further details regarding the locations of early planting. This additional planting similarly seeks to help provide more timely and effective mitigation and is welcomed.

- 7.35 *Selection of updated visualisations* – The Applicants have provided a selection of updated visualisations to illustrate a more realistic depiction of the mitigation planting at year 15 and the removal of the early planting. The visualisations also seek to illustrate the proposed design improvements which have been secured. This is welcomed as the planting currently depicted shows trees of a greater maturity than 15 years.
- 7.36 *Design improvements:* The Applicants have committed to a reduction in the footprint of the project substations from 190m by 190m to 170m by 190m – the western extent of the substations will move 40m eastwards – the Council has been seeking a reduction in the onshore substation footprints. This change allows the retention of a wooded area which would have been lost based on the previous proposals.
- 7.37 The Applicants have also committed to reductions in the maximum heights of the EA1N and EA2 substation infrastructure. As a result, the maximum building and equipment heights within the DCOs for the substations will be 14m, which is a reduction of 1m for the buildings and 4m for the equipment compared to what was previously proposed. A 5m reduction has also been secured for the lightning protection masts, these will now be a maximum of 20m.
- 7.38 The Applicants have also refined the finished ground levels of the substations and confirmed that a reduction of 2m for the eastern substation and a reduction of 0.7m for the National Grid substation can be achieved.
- 7.39 The combination of the reductions in the height of the infrastructure and the refinement of the finished ground levels means that the maximum building and equipment height for the eastern substation will be 3m lower than that presented in the Environmental Statements, 1m lower for the western substation and for the National Grid substation 0.7m lower than previously proposed. In terms of the lightning masts these will be 7m lower for the eastern substation and 5m lower for the western than previously presented in the Environmental Statements.
- 7.40 These reductions in the footprint, maximum heights and finished ground levels of the onshore substations are welcomed. Should the projects be consented the Council will continue to seek further reductions post consent.
- 7.41 *Outline Design Principles Statements* - The Applicants have also committed to the production of an Outline Design Principles Statement for the National Grid substation, one has been produced for the EA1N and EA2 substations, this was in response to a request by the Council. The Council will seek to ensure that this statement applies to the National Grid substation but also the sealing end compounds which form part of the necessary connection infrastructure. The design principles can then be utilised during the post consent design refinement process. In addition, we will continue to push the Applicants through the examination process to commit to seeking further reductions in

footprint and height of the onshore substations infrastructure and also to seek a firmer commitment to achieve this post consent.

- 7.42 *Section 111 of the 1972 Local Government Act (s111) agreement:* This agreement secures a compensatory fund including an administration fee, to East Suffolk Council, which has been increased in recognition of the total impacts evidenced by the Council. The sums proposed in total for both projects combined which relate specifically to the impacts of the onshore substations include:
- a) £355,000 to provide further landscape, environmental, access and amenity improvements and enhancements to Friston and its vicinity.
  - b) £150,000 to undertake landscape, environmental, access and amenity enhancements within 1.5km of the substations.
  - c) £400,000 as a contribution towards measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.
- 7.43 The Council considers that sums provided by the s111 agreement could deliver:
- Strategic offsite planting in addition to this providing money for the local community/landowners to undertake their own private planting.
  - Noise mitigation measures.
  - Landscape and ecological enhancements through reinforcing hedgerows, new hedgerow planting, woodland planting etc.
  - Access improvements including potential creation of a new bridleway link between Snape and Friston, diversion of crossfield paths onto field headlands, improvements to the surface of public rights of way etc.
- 7.44 The reductions to the maximum design parameters of the onshore substations provide welcomed embedded mitigation for the developments. The additional mitigation and early planting proposed in addition to funding to provide offsite planting will help in time to reduce the visual impact of the developments. The Council also welcomes the Applicants agreement to adaptive aftercare and maintenance. It is not possible however to fully mitigate the impacts of the onshore substations and therefore the Applicants have sought to provide compensation to offset the harm caused. The measures above seek to help address the Councils concerns regarding the timeliness of the delivery of effective mitigation, provide compensation for the harm to heritage assets and provide compensation for the disruption to the public right of way network. Based on the information provided the Council is able to move towards a more neutral position on these matters but will continue to fully engage with the examination process highlighting areas of concern but not objection.
- 7.45 Notwithstanding the improvements we have secured, we still maintain a difference of opinion with regards to the adverse impact of noise from the onshore substations which we will be pursuing through the Examinations. We also maintain a difference of opinion regarding whether all reasonable measures have been undertaken to ensure the scale and size of the substations will be minimised and regarding the design of the National Grid substation and whether this should be designed to accommodate future known connections or at the very least the impact of the future connections considered in the

CIA. These will remain matters of significant concern until they are satisfactorily addressed.

- 7.46 The Council will also continue to support Suffolk County Council in raising outstanding concerns in relation to the areas they are leading on through the examinations.

#### *Cable Route and Landfall*

- 7.47 The Council's Relevant Representation did not raise an objection to the impacts of the construction works associated with the cable routes or landfall locations but some concerns were raised regarding the impacts on landscape and visual amenity, public rights of way, ecology, construction noise and the method of construction/construction management.
- 7.48 The Council has continued to engage with the Applicants and secured some positive changes in relation to the proposals. Significantly, the Applicants have committed to a more coordinated method of construction in the event the projects are consented and constructed sequentially. Further mitigation has also been secured to reduce the impact on bats during construction, reduce woodland loss and give consideration to sensitive locations along the cable route close to properties. The Applicants have also committed to the provision of compensatory measures in relation to landscape, AONB, public rights of way and ecology.

#### *Landscape and Visual Amenity*

- 7.49 The projects propose to underground the cabling in its entirety which it is recognised provides significant mitigation against the visual and landscape impacts. The development does however still result in the loss of numerous sections of important hedgerows and trees. These hedgerows are often characterised by substantial trees which if removed and not replaced would result in the significant adverse impacts on the landscape character persisting for longer than assessed. Whilst it is noted that the intention is to reduce the working width of the cable corridor (from 32m to 16.1m) wherever possible, this still represents a notable impact on the existing historic hedgerow pattern which is a key characteristic of the prevailing landscape character types.
- 7.50 The Applicants have confirmed to the Council that all reasonable measures will be taken in terms of minimising cable corridor widths and micro-siting during the post consent work to try and minimise the loss of important trees and sections of hedgerows. The Council has also secured compensatory measures.

#### *Ecology*

- 7.51 The Council raised concerns in the Relevant Representation that there are some ecological receptors which are either not fully assessed or have insufficient mitigation/compensation measured identified and secured by the draft DCOs. These include bats, hedgerows, woodlands and trees during construction and the designated

sites in relation to adverse impacts on air quality during construction. In addition, the Council has highlighted the lack of commitment to ecological enhancements.

- 7.52 The Council has been engaging with the Applicants on these matters to seek to address the concerns raised.

#### *Public Rights of Way*

- 7.53 The previous comments in relation to the substations site regarding the lack of assessment on the impact on the amenity and quality of the user experience of the rights of way network remains a concern. The construction works will result in the disruption to numerous public rights of way and although the applications have sought to address the logistical aspects of the closures, the impact on the amenity of the rights of way is not addressed. Suffolk County Council as indicated previously will be leading on this matter during the examinations but the Council has sought compensation in relation to the disruption caused.

#### *Coastal Management*

- 7.54 The Council's Relevant Representation highlighted that further information was necessary to demonstrate that the proposed works would not cause local cliff destabilisation or damage to the subsea crag outcrop. The Council has continued to engage with the Applicants and is now confident that this matter can be satisfactorily addressed.

#### *Construction Noise*

- 7.55 Significant levels of construction noise and vibration are likely to occur at some sensitive receptors during the construction periods. The Council is concerned that there is insufficient information presented in the submissions to determine if the noise predictions are representative and there is a concern that there may have been an underestimation of the noise impacts. It is however acknowledged that construction proposals cannot be fully developed until contractors are appointed and prediction methodology includes necessary assumptions. There are however certain points along the onshore Order Limits where construction works are very close to residential receptors and it is at these locations that the Council consider enhanced mitigation may need to be employed. The Council has continued to discuss this matter with the Applicants and raised this concern during the second Issue Specific Hearing at the beginning of December.

#### *Method of Construction*

- 7.56 The Councils consider that the Applicants should commit to the simultaneous construction of the projects, if however this is shown not to be possible, as a minimum the first project should install ducting for the second project and thereby reduce the level of disturbance caused to the local communities and environment. This was successfully achieved in relation to East Anglia One and East Anglia Three offshore wind projects. The

Applicants have made some positive commitments in relation to this which will be set out in the next section.

*New Mitigation/Compensation for the Cable Route and Landfall Locations*

- 7.57 As stated previously, the Council has continued to engage with the Applicants to secure appropriate mitigation and compensation, the new measures secured in relation to the cable route and landfall have been outlined below.
- 7.58 The s111 agreement previously discussed also secures compensatory funds to be provided to compensate for the residual impacts identified by the assessments along the cable route in relation to the projects. These include:
- £400,000 to be spent in the area from the landfall to the substation including the AONB to support landscape, ecological and habitat enhancement, improve the public rights of way network in the vicinity, and fund measures to strengthen the existing qualities of the AONB.
- 7.59 The Council considers that sums provided by the s111 agreement could deliver the following types of projects, which would help to offset some of the impacts identified in terms of landscape and visual amenity, public rights of way and ecology:
- Landscape and ecological enhancements through reinforcing hedgerows, new hedgerow planting, woodland planting etc.
  - Access improvements including creation of a new bridleway link from Leiston to Thorpeness and the coast, improvements between the links between Thorpeness and Aldeburgh etc.
  - Strengthen qualities of the AONB by funding projects which are linked to the AONB Management Plan and its objectives.
- 7.60 The Applicants have recently committed to reduce the onshore cable corridor widths to a maximum of 16.1m for one project or 27.1m for both projects through woodland to the east of Aldeburgh Road, Aldringham. This commitment mirrors the existing commitment for reduced corridor widths through woodland to the west of Aldeburgh Road. This will help to reduce woodland loss. The Applicants have also committed to a reduction in the working width at the Hundred River crossing.
- 7.61 In order to further address some of the Council's ecological concerns the Applicants have committed to providing additional information in relation to the impacts from construction traffic emissions on designated sites, further mitigation measures in the form of planted hurdles to maintain bat foraging and commuting routes during construction, and details regarding the ecological enhancements provided by the projects. The Council is continuing to discuss with the Applicants the stated ecological enhancements provided.
- 7.62 The Applicants have provided further information in the form of an Outline Landfall Construction Method Statement to address the concerns raised at the landfall. The Council is satisfied that the Outline Landfall Construction Method Statement covers Coralline Crag impact avoidance, management of cliff destabilisation by vibration risk and

other matters relating to the planning of works regarding potential coastal change, to an acceptable standard.

- 7.63 A revised Outline Code of Construction Practice was submitted at Deadline 3 which recognises that there are some sensitive locations along the cable route where residential properties are in close proximity to the Onshore Order Limits and therefore potential construction works. The Council will continue to work with the Applicants to seek appropriate commitments to mitigation in these locations within the final Code of Construction Practice.
- 7.64 The Applicants have also confirmed that should the projects be constructed sequentially, the ducting for the second project will be laid at the same time as the cabling for the first project. This commitment is welcomed and will help to reduce the construction impacts associated with the second project. This commitment will be secured through the DCOs. The Council will also continue to push for the Applicants to work with the Government through the BEIS Offshore Transmission Network Review to explore any opportunities for greater coordination between the projects.
- 7.65 The Council did not object to the works associated with the cable route or landfall and therefore our overall position will remain unchanged from that agreed at the Cabinet meeting in January, although during the examinations we will highlight where the new measures have addressed our concerns and continue to seek to reduce impacts of the projects where possible.

#### *Project Wide Impacts*

##### *Socio-Economic Impacts*

- 7.66 The Councils set out in their Relevant Representation that the developments have the potential to deliver significant positive socio-economic benefits, which are very much welcomed. There is a high-level ambition to develop a sustainable regional and national supply chain with the indirect benefit of increased education and training that the offshore projects can bring to the region. It is however important that every effort is made to ensure a significant proportion of these benefits is localised. It is recognised that whilst the positive benefits are regionally felt, the negative impacts of the developments are felt more locally.
- 7.67 Notwithstanding the positive socio-economic impacts which the projects could bring, the Council expressed concerns in relation to the cumulative pressures on the labour force and on accommodation for workers in combination with other major infrastructure projects, in particular the proposed Sizewell C new nuclear power station. The potential impact on tourism is not considered to be adequately addressed within the submissions especially when the results of the visitor survey undertaken by the Destination Management Organisation (2019) are considered. The Council is concerned that the projects will negatively impact on visitors' perceptions and therefore impact their behaviour during the construction phase(s).



- 7.68 The Council has been discussing these concerns with the Applicants and further information and mitigation measures have been provided.

#### *Traffic and Transport*

- 7.69 The Council has raised significant concerns within our Relevant Representation in relation to several highways matters. Suffolk County Council will be leading on this matter during the examinations as they are the Local Highway Authority. Concerns have been raised regarding the impacts of Abnormal Indivisible Loads (AILs) and the adequacy of the mitigation proposed by the Applicants. The A12/A1094 Friday Street junction has a history of collisions most notably relating to right turning vehicle movements across the A12. It is considered that the proposed developments will further exacerbate these issues given the increase of right turn movements associated with the projects. The mitigation proposed in the Environmental Statements set out below is not considered adequate:

- A reduction in the posted speed limit in advance of the junction from 50mph to 40mph;
- Provision of enhanced warning signage to better highlight the junction to approaching drivers; and
- Provision of 'rumble strips' and associated slow markings, to provide an audible and visual warning of the hazard to approaching drivers.

- 7.70 The increase in traffic will mean that there will be fewer gaps for vehicles to undertake turning manoeuvres. This is considered the most important transport issue arising from these projects. The Applicants have considered carefully the safety concerns highlighted in relation to the A12/A1094 junction and a potential solution has been identified.

- 7.71 The Council will also continue to support Suffolk County Council in seeking to address other highways concerns highlighted in the Local Impact Report.

#### *Air Quality*

- 7.72 The Council raised concerns in relation to the impacts of the projects from construction vehicle emissions at the Stratford St Andrew Air Quality Management Area (AQMA) in our Relevant Representation. The Council also raised some additional concerns regarding the effect of re-routed traffic, impacts on ecological receptors, port related traffic emissions and construction dust nuisance. The Applicants have provided additional information to seek to address our concerns and also agreed to contribute towards monitoring in the AQMA.

#### *New Mitigation/Compensation for the Project Wide Impacts*

- 7.73 The Applicants have provided a Socio-Economic Clarification Note which has addressed the Council's concerns regarding the cumulative impacts of the projects with Sizewell C on the labour force and demands for accommodation.
- 7.74 The Applicants have provided two Air Quality Clarification Notes and a Sizewell C CIA Clarification Note to seek to address the Council's air quality concerns. The Councils are continuing to engage with the Applicants on this matter and are hopeful of a positive resolution. The Applicants have also committed to updating the Outline Code of Construction Practice to provide greater clarity regarding dust mitigation and have provided an Outline Port Construction Traffic Management Plan and Travel Plan which includes a commitment to consider air quality impacts as a result of port traffic. This further work is welcomed.
- 7.75 In addition to these measures the Applicants have also committed to the following:
- *Skills, Education and Economic Development Memorandum of Understanding (MoU)*: there have been *similar* MoUs for East Anglia One (EA1) and East Anglia Three (EA3), and we have been very pleased with the benefits and results that SPR has brought to the region through investment in skills and education. From an employment perspective, this MoU will include reference to 'best endeavours' to site the operations and maintenance base (O&M) in or around Lowestoft (where the EA1 operations and maintenance base is currently). The EA1 O&M base was part of a £25m investment in the Port of Lowestoft by SPR, providing approximately 100 long term jobs in addition to sustaining many more jobs in the supply chain. The MoU also commits to support local suppliers and work with SPR's supply chains to promote opportunities to maintain and raise the local content of offshore windfarms. As part of the EA1 project £45m was spent in construction contracts to companies within 9 miles of Lowestoft.
  - *Tourism Fund*: The Applicants have agreed to provide a fund of £150,000 to be used by East Suffolk Council in consultation with the Suffolk Coastal Destination Management Organisation and Suffolk County Council to support marketing campaigns to promote the area during construction and boost tourism. This will help to address the Council's concerns regarding the potential adverse impact on visitor perceptions caused by the construction of the projects.
  - *Friday Street Junction (A1094/A12)*: The Applicants have agreed to provide a traffic light solution to this junction to improve road safety, this will be funded wholly by the project working in conjunction with Suffolk County Council Highway Authority.
  - *Air Quality*: a contribution to a monitoring and mitigation fund (this is directly linked to the AQMA at Stratford St Andrew and indirectly linked to the Sizewell C project). This will provide funding to monitor emissions in the AQMA during construction of the projects. Should the Sizewell C project construct and have in

operation the Two Villages Bypass of Stratford St Andrew and Farnham prior to work commencing on EA1N or EA2, this contribution will be adjusted to reflect this.

- *Environmental Exemplar Memorandum of Understanding*: SPR are proposing an MoU signed by SPR, East Suffolk Council and Suffolk County Council, to collaborate on projects to support ambitious aims to improve biodiversity and drive the decarbonisation of energy used in homes and travel. The detail is still being developed collaboratively but a contribution of £500,000 (£250,000 per project) will be provided to enable the co-signatories and their agents to deliver projects within the communities neighbouring the onshore aspects of the EA1N and EA2 projects. It is expected that 50% of each project fund would be put into the trust following successful final investment decision and a further 10% would be released each year over a period of five years. The MoU can also be combined with other funds, such as those provided by EDF Energy in connection with Sizewell C, enabling the benefits to be maximised. The MoU could be utilised to support projects which seek to aid the net zero transition or enhance biodiversity/encourage the appreciation of it, such as:
  - Contribution to hydrogen or electric battery powered public transport;
  - supply of subsidised e-bikes for recreational use;
  - supply of EV community pool car;
  - Contribution to the installation of hydrogen electrolyzers;
  - Supply of individual home energy audits;
  - Provision of electricity distribution network feasibility/domestic supply;
  - enhance biodiversity and accessibility of the existing network or footpaths and cycle paths;
  - enhance existing publicly owned green spaces and verges for biodiversity;
  - create new spaces such as biodiversity banks or rewilding sites;
  - enhance access to tourist and recreational sites locally.
- *Community Benefits Fund*: This is a fund of £2.5m in total which will be provided by SPR on an annual basis at £100,000 per year to the Suffolk Community Foundation in recognition of the residual impacts to East Suffolk of hosting an offshore wind farm with its onshore requirements. This Fund will be available to the host communities to bid into.

7.76 The measures outlined above seek to address the key concerns the Council raised in their Relevant Representation and Local Impact Report regarding socio-economic and tourism matters, highways and air quality concerns around the Stratford St Andrew AQMA. The Council will continue to engage with the Applicants regarding any remaining concerns in relation to these matters and make appropriate representations at the examinations.

#### Council's Position on EA1N and EA2

7.77 In recognition that the principle of this development will accord with the Council's earlier declaration of a Climate Emergency, it is considered that the Council can move towards a

position of neutrality on both projects in recognition of the additional mitigating and compensatory measures provided by the Applicants for the majority of the projects. The additional pledge of investment into East Suffolk to promote overall green improvements, particularly in the locality of the two developments is a direct result of pressure from this Council. This investment covering a five-year period with an initial contribution followed by annual payments for five years, will be spent in the locality on projects that meet our agenda in addressing the climate emergency.

- 7.78 In addition to the measures outlined above, the Council is also working closely with the Applicants to address the remaining concerns outlined in the Councils Relevant Representation and Local Impact Report and will continue to raise these matters during the examinations until such time that they are adequately addressed.
- 7.79 Although the Council remains in positive dialogue with the Applicants, we continue to have significant concerns with regards to the proposed noise limit for the site and the associated impact on residential amenity and character of the area. We will continue to engage with the Applicants regarding the adequacy of the noise assessment and specifically regarding the background noise level and the considered underestimation of the operational noise impacts at the substations site. We will therefore continue to express significant concerns regarding the assessment of the projects in relation to operational noise aspects until such time that our concerns have been addressed.
- 7.80 The Council welcomes the Applicants commitment to reduce the size and finished ground levels of the onshore substations. The Council is however not yet satisfied that all measures have been undertaken to ensure that the size and scale of the onshore substations are minimised. We will therefore continue to pursue this matter during the examinations and express concerns until such time that our concerns are addressed.
- 7.81 There has also been no movement from the Applicants with regards to the cumulative assessment of the National Grid substation (which will need to be extended to accommodate other projects with offers from National Grid Electricity System Operator (NG-ESO) at Friston) as extended. The Council considers this to be a reasonable ask in this countryside location and will continue to challenge why the Applicants have not taken the opportunity to provide this requested assessment.
- 7.82 Notwithstanding the recommended change in the Council's overall position which is predominantly moving towards one of neutrality on these two projects, this Council continues to lobby Government to develop a more effective way to manage and coordinate the exploitation of offshore wind and its associated onshore infrastructure in a way that gives greater economies of scale and better protects the environment and local communities. We are actively involved in current and recent consultations being co-ordinated nationally and regionally to ensure a more co-ordinated approach in the future.
- 7.83 In addition to the above, this report also requests delegated authority to the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member for Economic Development, in addition to the delegated authority provided by Cabinet on 7 January 2020 to negotiate, resolve and agree matters on behalf of the

Council arising post-consent. This relates to the Council's ongoing responsibilities should either or both of the DCO's applied for by the Applicants be granted by the Secretary of State for BEIS.

#### Summary

- 7.84 At the time of the EA1N and EA2 Preliminary Meetings the Council maintained the concerns set out in this report as agreed at the Cabinet Meeting held on the 7 January 2020. As part of the considerations to enable that position to be agreed, the Council had regard to the mitigation set out in the Environmental Statements in addition to the compensation measures and MoU outlined in Table 1. This compensation, whilst welcomed, was not considered sufficient to adequately compensate for the impacts of the projects and overcome the Council's significant concerns.

Mitigation/Compensation Measure	EA1N	EA2
S111 Agreement		
Reduce, offset or compensate for construction impacts along the cable route from the landfall to the substation site including impacts on the AONB.	£120,000	£120,000
Provide further landscape and environmental improvement and enhancement to Friston and its vicinity	£70,000	£70,000
Undertake landscape and environmental measures to reduce, offset or compensate for the construction impacts of the Substation	£75,000	£75,000
Reduce, offset or compensate for longer term operational landscape and environmental impacts of the offshore infrastructure including measures to promote and support the special qualities of the AONB.	£0	£225,000
Contribution towards measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.	£200,000	£200,000
Total	£465,000	£690,000
Combined Total	£1,155,000	
Community Benefits Fund	£2.5m (£100,000 p.a. for 25 years)	
Skills, Education and Economic Development MoU	No fixed sum identified	

Table 1 – Key mitigation/compensation measures proposed at the time of 7 January 2020 Cabinet Meeting.

- 7.85 Since submission of the applications the Government has strengthened its commitment to offshore wind generation, reaffirming the target of 40GW by 2030, announcing the desire that offshore wind will be powering every home in the country in ten years and

pledging £160m to help upgrade ports and factories with the aim to create 2,000 jobs in construction and support a further 60,000. The Prime Minister's ten point plan and Energy White Paper also illustrate the ambition for a green recovery of the economy after Covid-19. As stated in paragraph 1.7, we recognise the importance economically of this industry to local ports and particularly towns of Lowestoft and Great Yarmouth. EA1 awarded a 30-year contract worth £25m and a further £45m in construction contracts to companies within 9 miles of Lowestoft. Jobs opportunities were created during the offshore and onshore construction period but also in relation to the O&M requirements. The EA1 MoU also secured commitments from SPR to support skills development, which included:

- Sponsoring Science, Technology, Engineering and Mathematics (STEM) events.
- Promoting careers in the offshore wind sector and STEM subjects to students in East Anglia.
- £200,000 to fund Masters Scholarships in engineering and environmental sciences.
- Working with East Coast College to support the Offshore Wind Skills Centre and sponsor students through programmes.

7.86 The Council recognising from the experience of EA1 that the projects have the potential to bring significant economic and skills benefits to East Suffolk. These benefits are considered especially important given the current challenges in the economy.

7.87 In the intervening months, following constructive negotiations with SPR the Council has now been presented with an improved set of mitigation/compensation measures in addition to further information/clarification on a number of matters. When these measures are taken collectively, they are considered sufficient to enable a recommendation to be presented which allows the Council to remove its objection to the overall impact of the onshore substations. The enhanced offer is set out below in Table 2. However, the Council still has significant concerns with the likely noise impact in the vicinity of the substation, the cumulative impacts of additional proposals coming forward nearby and regarding the design of the substations. The Council is committed to working with the Applicants and others to seek the best outcome to these proposals if the Secretary of State were to consent these schemes. The Council acknowledges the benefits of providing more offshore wind capacity to meet national requirements and East Suffolk Council needs to be a positive part in that process. However, this is not at any price and we will seek to get the best package available to offset harm.

New Mitigation/Compensation Measure	EA1N	EA2
<b>S111 Agreement</b>		
Sums to support ecological, landscape and habitat enhancements, improve the public rights of way network and strengthen existing qualities of AONB in Landfall to substation area.	£200,000	£200,000
Sums to undertake landscape, environmental, access and amenity enhancements within 1.5km of the substation.	£177,500	£177,500

Sums to provide further landscape. Environmental, access and amenity improvements and enhancements to Friston and its vicinity.	£75,000	£75,000
Sums for measures to support access, environmental and ecological enhancements to the AONB.		£465,000
Contribution towards measures relating to the preservation and enhancement of heritage assets and their settings in Friston and its vicinity.	£200,000	£200,000
Sums to administer the fund	£44,250	£44,250
Total	£696,750	£1,161,750
Combined Total	1,858,500	
Environmental Exemplar MoU	£250,000	£250,000
Tourism Fund	£150,000	
Community Benefits Fund	£2.5m (£100,000 p.a. for 25 years)	
<p>Modifications to project design and mitigation:</p> <ul style="list-style-type: none"> <li>• Reduction in the size of the EA1N and EA2 onshore substations from 190m by 190m to 170m by 190m.</li> <li>• Reductions in the maximum height of the substation infrastructure and lowering of finished ground levels of the eastern substation and National Grid substation.</li> <li>• Adoption of adaptive aftercare and maintenance in relation to the mitigation planting around the substation.</li> <li>• Additional mitigation planting at the substations site</li> <li>• Further details of early planting at the substations site.</li> <li>• Commitment that the ducting for the second project will be laid at the same time as the cabling for the first.</li> <li>• Provision of a National Grid substation design principles Statement</li> <li>• Commitment to provide planted hurdles</li> <li>• Reduced maximum cable corridor width in area of woodland west of Aldeburgh Road, Aldringham</li> <li>• Submission of Outline Landfall Construction Method Statement</li> <li>• Update to Outline Code of Construction Practice</li> <li>• Reduction in the height of the offshore turbines from 300m to 282m</li> </ul>		
Air Quality - Contribution to monitoring and mitigation at the Stratford St Andrew AQMA.	Final sums still to be agreed	
Highways - Funding of a traffic light solution to the A12/A1094 junction to improve road safety.	Final cost not yet known	
Skills, Education and Economic Development MoU	No fixed sum identified	

## **8 OTHER OPTIONS CONSIDERED**

- 8.1 The Cabinet could vary the response proposed in the recommendations and retain the current position agreed at the 7 January 2020 Cabinet meeting.

## **9 REASON FOR RECOMMENDATION**

- 9.1 As statutory consultee in the NSIP process for EA1N and EA2, the Council has been carefully scrutinising the information on the projects as submitted and continues to challenge the Applicants on specific areas in order to affect change where appropriate (i.e. reducing the scale and massing of onshore infrastructure to minimum levels possible to reduce adverse impacts and challenging noise levels and resulting impacts from the onshore substation sites). The Council will continue to seek amendments to the projects to address our remaining concerns but in doing so the Council acknowledges the potential these schemes and others have in meeting national climate change/energy opportunities.

### **RECOMMENDATIONS**

1. That the Cabinet is recommended that in negotiation with the Applicants on statements of common ground and in responses to the Planning Inspectorate/Examining Authority that East Suffolk Council continues to support the principle of offshore wind as a significant contributor to the reduction in carbon emissions and for the economic opportunities that they may bring to ports in the NALP geography that could support the construction and maintenance of the windfarms. Notwithstanding this, the Council:
  - a) Is neutral in relation to EA2 and the predicted offshore effects of the proposal on seascape, coastal landscapes, character and qualities of the AONB and cumulatively with EA1N due to the amendments made to the offshore wind turbine heights and provision of compensation.
  - b) Is moving towards a predominantly neutral position in relation to the overall impact of the onshore substations on EA1N and EA2 individually and cumulatively on the village and environs of Friston. The Council acknowledges that the onshore infrastructure is out of character with the village but recognises that the Applicants are seeking to provide embedded mitigation as part of their project which coupled with the mitigation and compensation packages proposed will enable the Council working with partners to provide additional improvements in addition to the embedded project mitigation.
  - c) Maintains significant concerns with regards to the impact of operational noise levels at the onshore substations site which will have an adverse impact on residential amenity and the character of the area until such time that appropriate and suitable mitigation or compensation is secured.
  - d) Maintains significant concerns with regards to the lack of cumulative assessment of the National Grid substation in its extended form, until such a time as this is considered to be adequately and appropriately addressed.
  - e) Maintains concerns with regards to the design of the onshore substations until such time that the Council's concerns are adequately and appropriately addressed.



- f) Accepts the additional provision pledged with regards to: revisions to the A1094 junction with the A12 which will significantly improve road safety at this junction which is welcomed; a contribution to air quality monitoring/mitigation of the Stratford St Andrew AQMA; a contribution to a Tourism Fund to provide additional marketing of East Suffolk in conjunction with the Suffolk Coast Destination Management Organisation and the commitment to lay ducting for the second project at the same time as the cabling for the first if they are constructed sequentially.
  - g) Accepts the s111 funds which will enable the provision of compensatory measures to help offset the impacts of the projects.
  - h) Accepts an environmental exemplar fund to support ambitious aims to improve biodiversity and drive the decarbonisation of energy used in homes and travel.
  - i) Will continue to engage with the Applicants to seek to address the matters of concern raised in the Relevant Representation and Local Impact Report and will raise these matters of concern during the examination as appropriate.
2. That authority be delegated to the Head of Planning and Coastal Management, in consultation with the Deputy Leader and Cabinet Member with responsibility for Economic Development to revise the Council's position on the projects if the matters of concern are adequately and appropriately addressed.
  3. Should the DCOs for EA1N and/or EA2 be granted by the Secretary of State for BEIS, Cabinet is recommended to delegate authority to the Head of Planning and Coastal Management, in consultation with the Deputy Leader and Cabinet Member with responsibility for Economic Development to:
    - Discharge requirements of granted DCOs.
    - Facilitate the Council's responsibilities under any Section 111/Memorandum of Understanding/agreement.
    - Consider and respond to any minor revisions to the DCOs proposed.

#### APPENDICES – None

#### BACKGROUND PAPERS

Please note that copies of background papers have not been published on the Council's website [www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk) but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.

Date	Type	Available From
7 Jan 2020	Cabinet Report	CMIS
Ongoing	EA1N DCO documentation and process	<a href="https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/">https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/</a>
Ongoing	EA2 DCO documentation and process	<a href="https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/">https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/</a>



## CABINET

Tuesday, 5 January 2021

### EAST SUFFOLK CITIZENS ADVICE REVIEW

#### EXECUTIVE SUMMARY

1. Cabinet agreed at its March 2020 meeting to make funding of up to £7,500 available to enable the three East Suffolk Citizens Advice to secure independent support to explore the opportunities for the transformation of Citizens Advice (CA) services in East Suffolk.
2. Touchstone Renard Management Consultants were commissioned jointly by the Council and the three Citizens Advice to undertake a review, evaluate options for change and recommend a preferred option. Their comprehensive report is attached as Appendix A to this report and summarised in paragraphs 4.1 to 5.8 below. An Executive Summary is attached as Appendix B to the report.
3. This report was presented to the Chairs and Chief Officers of the three Citizens Advice at a meeting on November 19<sup>th</sup> when an initial joint response to the report was presented on behalf of the three Citizens Advice Chairs.
4. This report seeks Cabinet approval for the next steps in the transformation process, including the allocation of funding (already available within the Council's budgets) to support further transformation work and additional, one off, funding (also from within existing budgets) for Citizens Advice North East Suffolk.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All Wards in East Suffolk
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<b>Cabinet Member:</b>	<p>CLlr Letitia Smith</p> <p>Cabinet Member with responsibility for Communities, Leisure and Tourism</p>
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<b>Supporting Officer:</b>	Nicole Rickard Head of Communities 01502 523231 <a href="mailto:nicole.rickard@eastsoffolk.gov.uk">nicole.rickard@eastsoffolk.gov.uk</a>
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## 1 INTRODUCTION

- 1.1 The East Suffolk Council area is served by three Citizens Advice – North East Suffolk, Leiston and Saxmundham and Felixstowe and District. These three independent, sovereign bureaux provide services to almost 250,000 people, many of whom are vulnerable and present with a range of complex issues.
- 1.2 East Suffolk Council currently provides funding totalling £199,600 per annum, allocated across the three bureaux as follows:
- Citizens Advice North East Suffolk: £78,000
  - Leiston and Saxmundham CA: £63,900
  - Felixstowe and District CA: £57,700
- 1.3 At its meeting in March 2020, Cabinet confirmed its commitment to funding Citizens Advice in East Suffolk at the same level until the end of the current Council term in 2023, and agreed that it would invest additional resources in providing independent support for a review of the opportunities for the transformation of Citizens Advice Services.
- 1.4 Whilst ESC is not proposing to reduce the total amount of funding available to Citizens Advice in East Suffolk during the term of this Council, it is keen to work alongside our three Citizens Advice to further transform CA services and, initially to explore the potential benefits (and disbenefits) of reducing the number of independent sovereign bureaux within the District.
- 1.5 There were/are a number of drivers for this review, including the recent review of funding for Citizens Advice across Suffolk by Suffolk County Council, the disparity of funding allocated to our three Bureaux (based on historical funding arrangements under the previous Suffolk Coastal and Waveney Councils) and the opportunities, in the context of the formation of the new single Council, for the further transformation of advice services in East Suffolk.
- 1.6 Work on the review was delay slightly due to the focus of the three Citizens Advice and the Council's Communities Team being understandably on the immediate Covid-19 response but Touchstone Renard Management Consultants were appointed lead consultants on the project in July 2020 and they delivered their report in October 2020, having agreed its contents with each of the three Citizens Advice and the Council.
- 1.7 A Skype meeting to consider the findings of the report was held between the Cabinet Member, the Chair and Chief Officer from each Citizens Advice and the consultants, Touchstone Renard on November 19<sup>th</sup>.

## 2 EAST SUFFOLK COUNCIL FUNDING

- 2.1 For the last five years, Suffolk Coastal District Council and Waveney District Council (and from 2019/20 East Suffolk Council) have provided a total of £199,600 of funding per year for the three Citizens Advice – Citizens Advice North East Suffolk (CANES), Felixstowe and District CA and Leiston and Saxmundham CA – covering the East Suffolk geography, this is allocated as follows:

Table 1

Citizens Advice	£	%
SLA Felixstowe & District CA	57,700	29%
SLA Leiston and Saxmundham CA	63,900	32%
SLA Citizens Advice North East Suffolk	78,000	39%
<b>TOTAL</b>	<b>199,600</b>	

2.2 Our Citizens Advice provide an invaluable service to the population of East Suffolk. The report to Cabinet in March this year provides information about client contacts and issues dealt with but updated versions of this information, and much more background about Citizens Advice services is available in the Citizens Advice Service Review Final Report which is the Appendix to this report. Key sections include:

- Finances – section 5.3 (pp8-11)
- Staff costs, numbers and roles – Section 5.4.1. (pp11-12)
- Premises – Section 5.4.2 (pp12-13)
- Volunteers – Section 5.5 (pp13-14)
- Locations – Section 5.6 (pp14-15)
- Clients Profiles and Issues – Section 5.7 (pp15-18)
- Delivery Channels – Section 5.8 (pp 18-20)
- Performance – Section 5.9 (pp20-21)

### **3 SUFFOLK COUNTY COUNCIL FUNDING**

3.1 Suffolk County Council currently contributes £120,000 to the seven Citizens Advice in Suffolk. From this £120,000, the proportion of funding allocated to the three CA in East Suffolk is 32.9% or £39,480 across the three Bureaux.

3.2 One of the specifics included in the ‘ask’ from SCC was that transformational progress includes a reduction to four CAs across Suffolk. The two West Suffolk CAs have recently moved to one entity, so removing West Suffolk and Ipswich CAs from the equation effectively means a reduction from five CAs to two CAs across Babergh, East Suffolk and Mid Suffolk. SCC have retained Citizens Advice nationally to undertake their own review, covering the whole of Suffolk – this report is not yet in the public domain.

### **4 CITIZENS ADVICE SERVICE REVIEW REPORT**

4.1 The East Suffolk report produced by Touchstone Renard (Appendix A) sets out the background, scope, work done and current situation and provides a comprehensive overview of current services. It also explores potential future demand for Citizens Advice Services, highlights experiences of other Citizens Advice that have recently merged and evaluates the options for change.

4.2 The Executive Summary to the report provides a good overview of the findings and this is summarised below (and attached as Appendix B to this report):

- The three East Suffolk Citizens Advice are *‘working well and have many strengths. They are solvent, able to deliver services to clients even during Covid-19, have capable and dedicated staff and volunteers and have good relationships with funders’*
- Touchstone Renard highlight that the basis of their work is a ‘transformation review’ and state *‘we believe that a merger of all three CAs offers the best opportunity for a genuine transformation of services across East Suffolk’*
- This recommendation is based on a review of the current situation which shows significant differences in the ways that the CAs operate, and discussions with other CAs nationally which have shown the potential that mergers offer for expanding and improving services

- They objectively scored three options – no merger, merger of two of the three CAs and merger of all three CAs – against a set of criteria, including those agreed by ESC and the three CAs in the Request for Quotation
- They emphasise that the case for merger is not about cost savings or efficiency but about creating better opportunities to fund and improve services, including better relationships with core funders, co-location, closer cooperation, project funding opportunities and the ability to recruit more specialised skills to be deployed across a wider area
- Citizens Advice that have merged have reviewed their systems and practice and rolled out the best existing practice across the new area, although there are some risks associated with this (see report Sections 7 and 9)
- Other opportunities identified include closer links with Councils, Department for Work and Pensions (DWP) and other Voluntary Community and Social Enterprise (VCSE) organisations in relation to prevention work, recording client outcomes more fully and consistently in order to better demonstrate impact, better career progression for staff, better strategic planning across the whole area and combined lessons learned, including in relation to remote working during Covid-19
- Touchstone Renard make the point that there has clearly been an unmet need for face to face services during lockdown especially for more elderly and vulnerable clients, and caution against closing offices or reducing outreach locations on the grounds of efficiency
- They emphasise that a merger of CAs does not have to mean a loss of identity
- Finally, they identify that a merger between Felixstowe and Leiston CAs would still deliver benefits – and be a lower risk option

- 4.3 The report includes a SWOT analysis of Citizens Advice in East Suffolk (collectively rather than individually) which identifies a number of strengths, weaknesses, threats, and opportunities that the three have in common (pp21-22)
- 4.4 Section 6 focusses on future demand, including *‘pent up demand which could generate a tidal wave of problems post Covid-19’* and references the work that our Community Partnership Board has done to anticipate the impacts of Covid-19 in the longer term. This section also references Sizewell C.
- 4.5 Section 7 of the report (pp23-29) highlights in detail the experiences of four CABs that have recently merged, both local and national, identifying the benefits and setting out in detail their experiences.
- 4.6 Section 8 focusses on the Options for Change and these are explored in detail in Section 5 below.

## **5 TRANSFORMATION OF CITIZENS ADVICE SERVICES – Options for Change**

- 5.1 The options considered as part of the review were as follows:

- A. Do nothing / retain three separate CAs
- B. Merger of the three East Suffolk CAs
- C. Partnership/consortium working across the three CAs
- D. Merger of CANES and Leiston CAs
- E. Merger of Leiston and Felixstowe CAs

- 5.2 Each of these options was evaluated against nine evaluation criteria, these are set out on page 30 of the report. Key points arising from this are as follows:
- Quality scores demonstrate good quality of service for clients and this should not be put at risk
  - Anything that makes CA interventions more preventative and less reactive improves the quality of service
  - Face to face remains an essential delivery channel for clients who struggle with remote services for any reason, which implies having more not less outreach locations, although the lockdown has helped CAs to develop the ability and technology to deliver services by phone, email and webchat
  - Cost savings in relation to mergers have been hard to achieve and are often offset by additional expenditure
  - Creating a single, bigger entity may help CAs become more effective strategic partner for councils
  - Relations are already good with ESC – Councillors sit on Trustee Boards and there are good links with the Housing and Communities teams
  - Leiston and Felixstowe are both small CAs that have been very successful in obtaining funding and building strong reserves and this should not be put at risk
- 5.3 The key point in this section is that *‘for a merger to succeed, the willingness to merge must be there and people from all CAs must be able to work together to develop a genuinely shared service with one coherent vision and consistent processes’*.
- 5.4 Section 8.4 of the report sets out the Decision Matrix that Touchstone Renard used to assess the option set out in 5.1 above. This displays the options as columns and maps them against the evaluation criteria shown as rows – each criterion has a weighting which shows its relative importance against the other criteria. The score and weighting are multiplied together to provide a ranking of options and the scores for each option are as follows:
- A. Do nothing / retain three separate CAs - 348
  - B. Merger of the three East Suffolk CAs - 465
  - C. Partnership/consortium working across the three CAs - 356
  - D. Merger of CANES and Leiston CAs - 363
  - E. Merger of Leiston and Felixstowe CAs - 392
- 5.5 This shows that Merger of the three CAs (465) is the option that best meets the criteria, followed by Merger of Leiston and Felixstowe CAs (392) and Merger of CANES and Leiston CAs (363).
- 5.6 The remainder of the report provides a more detailed **analysis of the three ‘merger’ options**, with particular focus on the ‘Merge all three CA’s’ option. This includes (pp 39 – 30) Principles and key features of this service delivery model, financial implications, HR implications and Risks and mitigation. The financial analysis suggests that savings of up to £74,500 could be achieved.
- 5.7 A **risk analysis** is included on p42 and indicates that the risks with the highest probably and impact are:
- Delays - 16
  - Failure of trustees and key managers to work effectively together to deliver the merger – 15
  - Loss of key staff – 12

- Difficulties in managing services across a large area with poor transport links – 9

5.8 The final section of the report is a **Force Field Analysis** which considers the key forces that support a major change and those that may resist it.

## 6 RESPONSE FROM CITIZENS ADVICE

6.1 Although the initial findings report and the final draft report were both shared with the three Citizens Advice and ESC individually, it was felt that it would be useful to formally receive the report from Touchstone Renard as a group to enable everyone to ask questions and clarify key aspects of the document. This session took place on 9<sup>th</sup> November and included the Chair and Chief Officer of each of the three Citizens Advice, plus the Cabinet Member, Strategic Director and Head of Communities.

6.2 During this session, a joint statement on behalf of the three Chairs was read out by the Chair of Leiston and Saxmundham Citizens Advice as follows *‘In the light of the Touchstone report on the future of Citizens’ Advice services in East Suffolk, the Chairs of CA Felixstowe & District (Doreen Savage), CA North East Suffolk (Jan Wickham) and CA Leiston, Saxmundham & District (Nick Mayo) have discussed and agreed a starting-point for further work. This is also pertinent to the discussions on Eddie Collins’ report on CA services in Suffolk as a whole.*

*The Chairs have agreed that:*

- i. the ‘do nothing’ approach is not an option;*
- ii. merging CA Felixstowe and CA Leiston and leaving CANES on its own is not a wise or helpful move;*
- iii. merging CA Leiston and CANES is equally unwise and would leave CA Felixstowe an easy target for CA Ipswich to swallow up;*
- iv. merging CA Felixstowe, CA Leiston and CANES into one is the most sensible way forward, if each retains its own identity and advice centre location(s);*
- v. each of the current Bureaux must be involved in discussions and proposals on an equal footing;*
- vi. we will need help to pull this together, and to determine the shape and format of ‘CA East Suffolk’. We will be seeking external support to determine workstreams and a methodology for taking these forward including how we select personnel, whether Trustees, staff, or volunteers, to work on them; and*
- vii. the pressure to find a solution will not determine the pace of negotiations. Given the difficulties of meaningful joint working under COVID rules, there must be a sensible and achievable timeframe, which may necessitate delays on major decisions until COVID restrictions are lifted or relaxed. We already have an e-mail from Nicole Rickard at ESC confirming that there is no pressure to act quickly and the timing of any merger must be informed by a detailed assessment of the work that would be involved.”*

6.3 This was welcomed at the meeting as a positive and constructive response to the report.



## **7 HOW DOES THIS RELATE TO THE EAST SUFFOLK STRATEGIC PLAN?**

- 7.1 The funding that the Council provides for Citizens Advice in East Suffolk contributes to the delivery of the 'Taking Positive Action on What Matters Most' and 'Maximising Health, Wellbeing and Safety in Our District' priorities in the Enabling Our Communities section of the Council's Strategic Plan.

## **8 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 8.1 The £199,600 funding for Citizens Advice in East Suffolk is already profiled within the budget and therefore the report agreed by Cabinet in March 2020 did not propose a change in funding. However, it did include a paragraph on the potential reallocation of resources from 2021-22 onwards to better reflect the distribution of the population of East Suffolk. This allocation is a legacy of the funding available to the two separate Councils prior to 2019 and means that Citizens Advice North East Suffolk currently serves 47.5% of the population but receives £39% of the funding allocation.
- 8.2 In the interests of fairness and to avoid destabilising two CAs (Leiston and Felixstowe) in order to rebalance the funding available within the budget envelope in favour of Citizens Advice North East Suffolk, it is proposed to provide an additional non-recurrent payment of £16,000 to CANES for the 2021/22 financial year only to cover the period to March 2022 by which time it is hoped that significant progress will have been made in relation to the merger.
- 8.3 The additional sum of £7,500 used to commission Touchstone Renard was made available from within existing budgets and there is still £300 of this funding remaining. It is proposed to supplement this with a further £5,700 from within existing Communities Team budgets in order to pay for Touchstone Renard to work with the three Citizens Advice to develop a phased Merger Implementation Plan and a fuller business case for merger. We would ask the three Citizens Advice to consider supplementing this funding from their own budgets.

## **9 OTHER KEY ISSUES**

- 9.1 No Equality Impact Assessment has been undertaken at this stage as no specific changes to the current structure have been agreed. An Equality Impact Assessment will be undertaken once further information is available from the three CAs about firm decision for the future structure of advice services in East Suffolk.

## **10 CONSULTATION**

- 10.1 Consultation has been undertaken throughout with all three Citizens Advice. CA North East Suffolk has made a case that the allocation of funding between CAs in East Suffolk should be reviewed to better reflect population served, number of clients seen and cost per client and have, through their Chair, reiterated the request that this be revisited for the 2021/22 financial year pending further work towards a merger, which they support.
- 10.2 A number of Councillors, particularly in the Kesgrave and Martlesham area, have been approached by CA Ipswich for funding from their Enabling Communities Budgets to support clients from their wards who choose to access CA services in Ipswich. Ipswich CA has requested that the Council consider core funding for them as part of this review. However, the difference between the number of East Suffolk residents accessing Ipswich CA and the number of Ipswich residents accessing CA services in East Suffolk (particularly

from Felixstowe and District CA) appears to fluctuate year on year and more information is needed on this.

- 10.3 The Council is keen to work with our CAs over the next twelve to eighteen months – the latter being the average timescale from start to successful merger - to support them in their transformation process and provide whatever reasonable support is necessary.

## **11 OTHER OPTIONS CONSIDERED**

- 11.1 The other main options considered were to a) retain CA funding at the current level i.e. with no requirement or support for transformation or b) to rebalance the funding available across East Suffolk for the 2020-21 financial year prior to the outcomes of the transformation work to be undertaken over the next twelve months.

- 11.2 There is a clear precedent, demonstrated by the formation of the single East Suffolk Council and successful transformation of CA services both in Suffolk and nationally, for reducing the number of organisations whilst maintaining (and indeed increasing) both the number of locations from which key services are delivered and the range of services provided, including additional prevention and early intervention activity.

## **12 REASON FOR RECOMMENDATION**

- 12.1 The recommendation is based upon an initial review of Citizens Advice in East Suffolk that is rooted in the recognition of the importance of the support that Citizens Advice provide to individuals and families in East Suffolk, particularly those who are vulnerable for a range of reasons, and even more so in the context of Covid-19.
- 12.2 Additional funding has been made available by the Council to support the transformation process which enabled Touchstone Renard to be commissioned to support this work. The favoured option in the report is clearly for a merger of the three Citizens Advice and it is felt that there have been huge benefits in having an independent and objective organisation to support the process thus far and that ideally this support would continue. There is still £300 remaining from the original commission and therefore it is proposed that East Suffolk Council provide a further £5,700 to give a total of £6,000 for Stage 2 of the process to be matched by the three Citizens Advice from their individual budgets as necessary.
- 12.3 In terms of the request from Citizens Advice North East Suffolk that the funding be rebalanced between the three Citizens Advice to better reflect the population in the catchment area of each, it is felt that doing so prior to a merger would significantly impact the two southern Citizens Advice at a time when their services are needed more than ever and therefore it is proposed that ESC should allocate an additional one off, non-recurrent payment of £16,000 in 2021/22 to Citizens Advice North East Suffolk on condition that they explore other avenues of funding secured by the other two Citizens Advice, particularly the Ropes Trust. This funding would not be added to the annual funding allocation for Citizens Advice services in East Suffolk.
- 12.4 We strongly believe that the proposed transformation could release capacity and resources in order to enable Citizens Advice to work more closely with the Council on preventative activity to allow us to target those who may be in need of support more directly, and earlier (i.e. before they reach crisis point) than ever before.

## **RECOMMENDATIONS**

1. That Cabinet notes the findings of the Touchstone Renard Review of Citizens Advice in East Suffolk.
2. That an additional sum of £5,700 from within existing budgets be made available to enable Touchstone Renard to continue to work with the three CAs on the next phase of transformation – specifically to prepare a phased implementation plan and a fuller business case for merger. The Council expects that additional funding, if required, should be provided by the three Citizens Advice.
3. That East Suffolk Council should continue to support Touchstone Renard in working with the three CAs to define the scope of the next phase of transformation review.
4. That an additional one-off payment of £16,000 be made to North East Suffolk Citizens Advice for the financial year 2021/22, on condition that they also explore other avenues of funding (including the Ropes Trust).

## **APPENDICES**

<b>Appendix A</b>	Citizens Advice Service Review Final Report
<b>Appendix B</b>	Citizens Advice Service Review Executive Summary

## **BACKGROUND PAPERS – None**



## **Citizens Advice Service Review Final Report (R1)**

Review Team: Harry Machin, Phil Austin  
and Richard Wood

Touchstone Renard Project Number: ESC 1305

Report date: 21<sup>st</sup> October 2020

Touchstone Renard Limited  
152-160 City Road  
London EC1V 2NX  
Tel: +44 (0) 203 954 2576

Contact Name: Phil Austin  
Email: [paustin@TouchstoneRenard.com](mailto:paustin@TouchstoneRenard.com)



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### Acknowledgement

We would like to thank all the people involved throughout the review process, from the three CABS concerned (including the Chief Officers, Trustees, staff and volunteers), East Suffolk Council (ESC) and all other stakeholders, who gave us their time, input and support. We also express our thanks to the four merged CABS that we interviewed regarding their experiences and lessons they have learned.

### Covering statement

This report and its contents have been prepared for ESC and the three CABS as part of the East Suffolk Citizens Advice Service Review project. Statements throughout this work are made in good faith based on the information provided by those involved in the review or otherwise made available or disclosed during the period of the project.

### UK London Office

Touchstone Renard Limited  
152-160 City Road, London EC1V 2NX  
Tel: 0203 954 2576

Email: [office@TouchstoneRenard.com](mailto:office@TouchstoneRenard.com)

Web: [www.TouchstoneRenard.com](http://www.TouchstoneRenard.com)

Incorporated in the United Kingdom on 28<sup>th</sup> December 1987. Company Registration Number: 02208452

## 1. EXECUTIVE SUMMARY

The three East Suffolk CABs – CANES, Felixstowe and Leiston – are working well and have many strengths. They are solvent, able to deliver services to clients even during Covid-19, have capable and dedicated staff and volunteers and have good relationships with funders. As we have been asked: “The system isn’t broken, so why does it need fixing?”

One answer to that question is that both Suffolk County Council (SCC) and East Suffolk Council (ESC) have made further funding after March 2021 partly conditional upon ‘transformation’ of services. Our review is described (in the Request for Quotation (RFQ)) as a ‘transformation review’, and **we believe that a merger of all three CABs offers the best opportunity for a genuine transformation of services across East Suffolk**. We have based this opinion on three main types of analysis:

- A review of the current situation, which shows significant differences in the ways that the three CABs operate, especially between CANES and the other two CABs (see Section 5).
- Discussions with four CABs from other parts of the country that have undergone recent mergers, which show the potential that mergers offer for expanding and improving services (see Section 7).
- Scoring the different options (no merger, merger of two of the three CABs, merger of all three CABs) against a set of criteria including the ones mentioned in our RFQ. The merger of all three CABs had the highest score, by a considerable margin (see Section 8).

**The case for merger is not about cost savings or greater efficiency.** Some cost savings, for example by sharing local premises with other agencies, could be made irrespective of mergers (though mergers can provide a further impetus to reduce premises costs). Most of the cost savings on Chief Officer (CO) salaries would be offset by the likely need to offer a higher salary to the CO of a larger, merged CAB and the need for effective deputies to manage reporting lines and share leadership tasks. Relatively minor cost savings can, however, be made on governance, audits and membership fees payable to National Citizens Advice (NCA). CABs that have merged have mentioned additional costs such as new equipment, marketing and changes to office layouts.

**The case for merger is about creating better opportunities to fund and improve services.** CABs that have merged have found that their relationships with core funders (mainly councils) have improved and that new opportunities for collocation and closer cooperation have arisen. Funders value having a single point of contact for local CABs, rather than multiple ones.

Opportunities for project funding have also increased for the CABs that have merged, along with the ability to recruit more specialised skills to be deployed across a wider area. Within East Suffolk there are clear disparities between the project funding currently used by CANES on the one hand and Felixstowe/Leiston on the other, providing opportunities to spread local sources of funding more widely across the whole district. **For CABs that have merged, financial resilience has improved overall.**

CABs that have merged have all reviewed their systems and processes and (generally) have rolled out the best existing practices across the whole of their new areas. They have told us that this has improved services for clients, but there are associated risks as we indicate in Sections 7 and 9.

Other opportunities that stand out include:

- Closer links with councils, DWP and other voluntary sector organisations (VSOs) could enable greater numbers of vulnerable clients to be referred to CAB before their problems escalate out of control.
- More could be done to record outcomes for clients more fully and consistently across the three CABs, and to make use of the combined statistics to demonstrate the impact of CAB’s work to funders.
- Merging Trustee Boards enables a new merged CAB to select the most motivated trustees with the most relevant skills, from a large pool of legacy trustees.

- Better career progression for staff within the one organisation, and the potential to offer higher salaries.
- Better strategic planning for the whole district, in times that are increasingly uncertain.
- Combining the lessons learned from the lockdown, especially as regards remote delivery of services.

Concerning the last point above, **we reject the idea that face to face services can be fully replaced by remote services.** The lockdown has greatly improved CABs' capabilities, processes and technology for providing remote services, but there has clearly been an unmet need for face to face services during the lockdown, especially for more elderly and vulnerable clients. Consequently there should be no question of closing offices or reducing outreach locations on the pretext of greater 'efficiency', though there may be a case for a more strategic approach to providing a face to face CAB presence throughout the main population centres across the district.

**A merger of CABs does not have to mean a loss of local identity.** Some of the CABs that have recently merged have retained the local name ('Citizens Advice Thurrock' for example) within a legal entity that covers the wider district ('Citizens Advice South Essex'), and this would be possible for any of the three local CABs in East Suffolk.

As mentioned above, there are risks associated with a merger of the three CABs. It is important that the three CABs are able to work together to maximise the benefits and reduce delays, and a structure would need to be put in place to enable that to happen.

**A merger between Felixstowe and Leiston CABs is a lower-risk option that would still deliver benefits.** These two CABs are quite similar in the ways that they work and in the projects that they work on, and if merged they would be more or less equal in size to CANES. Our view, based on one brief consultancy project, is that the potential rewards from a merger of all three CABs would offset the risks and potential difficulties of the merger process. However, a merger between Felixstowe and Leiston CABs would be a reasonable alternative step that would offer some transformation of services.

In parallel with our review, NCA have been carrying out a review of CABs across Suffolk, which should provide an overall context for our recommendations to be considered. NCA are also (separately) conducting some research into CAB mergers and we understand that this report should be published in November.

## 2. BACKGROUND

The purpose of our review is to develop a model or models of service delivery for the East Suffolk CABs which:

- Maintain or enhance the level of service delivery to clients.
- Provide best value for money.
- Enable the service to develop additional income streams.
- Ensure that vulnerable clients (for example disabled, elderly, socially isolated, lacking internet access, or with difficulty in communicating) have 'equality of access' to services.

The Request for Quotation for our review also references encouraging the three CABs to 'free up resource' for:

- Greater involvement in prevention activity.
- Additional outreach into identified and agreed target areas.

Future ESC funding for CABs is to be maintained at the current level (£199,600 pa) for the current year (2020-21) and the next two financial years until March 2023, subject to 'evidence of progress towards transformation'.

Suffolk County Council (SCC) have proposed to reduce their funding of CABs to £120,000 a year for all the Suffolk CABs, of which East Suffolk's share would be £39,480. This has been supplemented by funding from two Clinical Commissioning Groups (CCGs), namely NHS Ipswich and East Suffolk CCG and

NHS West Suffolk CCG, of a further £187,000 across the local CAB network, but this funding is not guaranteed to continue beyond March 2021.

The sums that are currently available from SCC are contingent upon the CABs meeting some potentially quite stringent conditions, including:

- A reduction to four CABs across Suffolk as a whole.
- CABs to exploit additional sources of funding.
- CABs share accommodation with partner organisations where this is practicable.
- CABs demonstrate their social and economic impact by reporting on indicators that match SCC's requirements. SCC have set out ten specific indicators as a basis for future discussion.

Any future alignment of councils in Suffolk may be subject to the government's proposed reorganisation of local authorities. It will be interesting to know (and relevant to the CABs) whether the government will propose a unitary council for Suffolk.

### **3. SCOPE**

The review covers the three Local Citizens Advice Bureaus (CABs) in East Suffolk: North East Suffolk CA, Leiston and Saxmundham CA and Felixstowe CA.

It does not cover the CABs across the rest of Suffolk, including Ipswich. We have not evaluated the option of Felixstowe CAB merging or co-operating more closely with Ipswich CAB.

### **4. WORK DONE**

We have:

- Reviewed relevant data concerning East Suffolk and its population.
- Carried out a desktop review of the information provided by the three CABs.
- Carried out analyses including:
  - Analyses of CAB's dashboard data for the 2019-20 financial year and, where relevant, for the first four months of the lockdown (March to July 2020).
  - A SWOT analysis focused on the three CABs.
- Carried out telephone and online interviews with:
  - The Chief Officers, Chairs, and Treasurers of each of the three CABs.
  - The Head of Communities for ESC and NHS Norfolk & Waveney / Ipswich & East Suffolk Clinical Commissioning Groups (Nicole Rickard).
  - SCC's Cabinet Member for Environment and Public Protection (Councillor Richard Rout).
  - SCC's Head of Trading Standards (Graham Crisp).
  - Staff and volunteers of each of the three CABs, as recommended by the Chief Officers.
  - NCA's Permanent Relationship Manager for the three CABs (Lesley Williams-Day).
  - NCA's Senior Strategic Change Consultant, who is carrying out a review Of Citizens Advice Services across Suffolk (Eddie Collins).
  - Key people from other CABs that have carried out recent mergers:
    - The Chair and Chief Executive of West Suffolk CAB
    - The Chief Executive of Bournemouth, Christchurch and Poole CAB
    - The Chief Executive of Sheffield CAB
    - The Chief Executive of South Essex CAB.
- Documented the current situation concerning the finances, staffing and volunteers, locations and premises, delivery channels, clients, operations, governance and performance of each of the three CABs.
- Considered the impact of the Covid-19 lockdown on CAB services.



- Considered future demand for CAB services.
- Carried out an overview of the options for the future of the services provided by the three CABs.
- Prepared an Emerging Findings report and discussed it with the key stakeholders (the three Chief Officers and the Head of Communities, ESC)
- Prepared a summary business case for our recommended option.
- Made suggestions for implementing the recommended option.

We have been hampered by the CABs being closed during the lockdown, so have been unable to see the premises or observe the CABs in action for ourselves.

We have been unable to review the NCA report commissioned by SCC, which is not available at the time of drafting this report.

## 5. CURRENT SITUATION

### 5.1 Introduction

Most of the analysis in this section is based on the information provided by the CABs for the 2019-20 financial year. This was almost a 'normal' year in the sense that the lockdown did not begin until 23<sup>rd</sup> March 2020. The period since then, that is the current financial year, has clearly been 'abnormal' and we consider the implications of this elsewhere in our report.

Citizens Advice's 'dashboard' information can be structured and analysed in many different ways. We have used information on all the clients, issues and outcomes recorded by each CAB, rather than limiting that information to clients resident in East Suffolk, or in Suffolk as a whole.

We have been told of instances and reasons why not all clients, issues, activities and outcomes may not have been recorded at certain times. We have made no adjustments for any such factors and have used the information that has been recorded.

### 5.2 East Suffolk context

#### 5.2.1 Suffolk districts

East Suffolk is the largest district of Suffolk. It contains nearly a third (32.6%) of the total Suffolk population and is 28% larger than Babergh and Mid Suffolk combined. (Source: Suffolk Observatory website link to [https://www.healthysuffolk.org.uk/uploads/Population Suffolk on a Page 2019 v1-1.pdf](https://www.healthysuffolk.org.uk/uploads/Population%20Suffolk%20on%20a%20Page%202019%20v1-1.pdf). Data for 2018)

District	Population	% of Suffolk total
Babergh	91,401	12.0%
<b>East Suffolk</b>	<b>248,249</b>	<b>32.6%</b>
Ipswich	137,532	18.1%
Mid Suffolk	103,493	13.6%
West Suffolk	178,881	23.6%
<b>Total</b>	<b>759,556</b>	

#### 5.2.2 East Suffolk populations

East Suffolk's Economic Growth Plan 2018-23 states the following:

"The largest town is Lowestoft. With a population of about 70,000, Lowestoft is home to just under a third of the 240,000 people who live within East Suffolk, and a slightly higher proportion of the working age population. This means that the performance of Lowestoft has a major bearing on the economic health of East Suffolk as a whole.

Almost 50 miles away and to the south, Felixstowe is the second largest settlement. It is home to around 25,000 people.

Also, in the south are towns – like Kesgrave – which border Ipswich – and are notable East Suffolk population centres.

Then there is a group of (mainly smaller) market towns – like Woodbridge, Leiston, Framlingham, Saxmundham, Beccles, and Bungay – which are distributed around East Suffolk and typically have populations of 5,000 - 10,000 people.”

For context, the population of Ipswich, which borders East Suffolk, is approximately 133,000 (source: 2011 census), increasing to 180,000 when suburbs are added.

A high proportion of the East Suffolk (ES) population live in smaller towns and villages, in most cases with poor transport links (see below).

ESC’s Cabinet paper dated 3<sup>rd</sup> March 2020 states that:

“Using the 2018 Suffolk Observatory population estimates, the population based in the former Suffolk Coastal District and served by Leiston and Saxmundham and Felixstowe and District CAs was 129,938 or 52% of the total population and the population of the former Waveney District, served by CA North East Suffolk was 118,331 or 48%.”

### 5.2.3 Demographics and deprivation

Suffolk Community Foundation’s Hidden Needs report, first published in 2011 and updated in 2016, provides insights into the extent of hidden deprivation in the county, especially in rural areas. Our impression is that this work has largely been subsumed into subsequent analysis by ESC.

ESC have provided us with their ‘East Suffolk – Profile’ data pack, which shows the following [with our comments added in square brackets]:

#### *Demographics*

- More than one in four people (27%) are aged 65 or over, compared to the national average of 18%. Nearly 10,000 of these (3.9%) are aged 85 or over. [This makes the accessibility of services for this age group, for example their reduced use of CAB services during lockdown and the closure of AgeUK in the area, an important consideration.]
- All groups below the age of 50 account for a smaller proportion of the East Suffolk population than they do across Great Britain as a whole.
- The population of East Suffolk is growing more slowly than that of Suffolk, which in turn is growing more slowly than that of Great Britain as a whole.

#### *Deprivation*

- A higher proportion of people in East Suffolk, including older people and children, are affected by income deprivation compared to the proportion for Suffolk as a whole. Similarly, a higher proportion of working age people suffer from employment deprivation.
- Levels of deprivation vary across the District, with areas of high deprivation in certain wards within Lowestoft and Felixstowe and low deprivation in the more affluent areas. [Also ‘hidden deprivation’ exists in rural areas across the district, many of which are served by Leiston CAB.]
- Income deprivation for older people is quite marked in some of the more remote rural areas as well as in the main towns.

#### *Health and social care*

- There are differences in life expectancy across the District of up to 10.9 years for males and up to 14.8 years for females.
- Prevalence of dementia is higher than the national average among patients at 14 of 25 GP surgeries in East Suffolk.
- 26.7% of primary school children are overweight or obese.
- 46.9% of adults do not exercise.
- Social isolation is highest in some rural areas, as well as in parts of Felixstowe.

### *Employment and education*

- 7% of adults are in receipt of universal credit, compared to 5.4% across Suffolk.
- The performance of East Suffolk schools at Key Stage 4 level was significantly worse than the national average on the measures shown in the slide pack. The results for Key Stage 2 were closer to the national average.

### *Housing and environment*

- 26,600 (24.2% of all houses) are in poor condition.
- 7,400 homes (6.8% of all houses) are hard to heat.

### *Transport*

- 74.2% of homes are within a quarter of a mile of a frequent bus service (though this applies to only 38.3% of homes in Framlingham and Wickham Market). 'Frequent' is defined as an average of 5 buses a day or more.
- 8.2% of homes are more than 2 miles from a frequent bus service.

## **5.2.4 ESC Community Partnerships**

ESC has developed a programme of Community Partnerships (CPs) across the District. There is a map of the CPs at **Annex 2**. The eight Partnerships, and their key priorities, are listed in **Annex 3**.

We note that one objective is to develop a Village Hub to bring services to people, which may have an implication for CAB services including outreach services. Some Chief Officers have emphasized the importance of retaining local links that match the Community Partnerships, under any new structure.

## **5.3 Finances**

### **5.3.1 Overview**

Audited accounts are not yet available for the year ended 31<sup>st</sup> March 2020, so we have relied on spreadsheets and other information provided by each CAB.

In the last complete financial year (ended 31<sup>st</sup> March 2020) the three CABs between them generated income of £785,574 and expenditure of £721,003, resulting in a combined surplus for the year of £64,571. This increased their total unrestricted reserves to £392,584, which is sufficient to cover expenditure for 6.6 months overall. Within that total, Leiston's reserves are strong (12.3 months) while CANES's are weaker (4.2 months). £60,000 of CANES' reserves are set aside to cover possible future redundancies, making their reserves position weaker still.

CANES is the largest of the three CABs, with income that is slightly lower, and expenditure that is higher, than the other two CABs combined.

Leiston's surplus of over £44,000 for 2019/20 was exceptional – the 2018/19 surplus was £3,000. It was caused by a higher level of grants and donations, including those related to the Covid-19 pandemic, the costs saved in the short term by the inability to recruit as quickly as hoped, and the contributions from the HtC and Community Connector projects.

	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Total</b>
Income 19/20	£205,140	£194,025	£386,409	<b>£785,574</b>
Expenditure 19/20	£173,837	£149,484	£397,682	<b>£721,003</b>
Surplus / (deficit) 19/20	£31,303	£44,541	(£11,273)	<b>£64,571</b>
Reserves at 31/3/20	£100,011	£152,573	£140,000	<b>£392,584</b>
Number of months expenditure covered by reserves at 31/3/20	6.9 months	12.3 months	4.2 months	<b>6.5 months</b>

### 5.3.2 Sources of income

A dilemma for CABs, as for other charities, is how to attract sufficient long-term, 'core' funding for ongoing operations, which does not depend on one-off projects that may or may not be renewed. This is why council funding and other long-term partnerships are so valuable.

Points to note include:

- **Sources of income are vulnerable to future pressures.** Core funding from councils is in question (see below) and project funding tends to be short term / renewable annually at funder's discretion.
- SCC funding has reduced considerably in recent years, and future funding is conditional upon 'transformation' of services and other conditions.
- The CCGs' support for SCC funding did not extend to CANES, whose CCG did not take part in this.
- ESC funding is (to a lesser extent than SCC) conditional upon transformation of services. The respective shares of the three CABs are based on the amounts paid by the legacy councils and an adjustment in favour of CANES is likely in future, at the expense of the other two CABs.
- Leiston have received particularly good support from their local parish councils.
- CANES expect their income from social prescribing for 2020/21 to be £132,000 – almost as much as the grants from ESC and SCC combined.
- **Several sources of project funding are unique to one CAB, suggesting that there is scope for a more joined-up approach to dealing with project funders.**

CANES have estimated that they could potentially increase their income from letting offices and meeting rooms from £6,000 achieved last year to say £25,000 in future, based on:

- Offices fully let for a year - £10,000.
- Meeting room let 50% of weekdays, plus some time at weekends - £15,000.

<i>Income: 2019/20 financial year</i>	Felixstowe	Leiston	CANES	Total	Comments
ESC grant	£57,700	£63,900	£77,940	<b>£199,540</b>	The allocation of funds between the three CABs may be rebalanced to reflect workloads and populations served.
SCC grants	£31,883 (£15,237 from CCG)	£32,056 (£15,237 from CCG)	£59,239	<b>£123,178</b>	This funding is conditional upon 'transformation' of services and other conditions. There will be pressure for further cuts due to SCC's financial position.
Town and parish councils	£4,360	£9,428	£4,000	<b>£17,788</b>	Leiston appear to have particularly good support from local councils.
ESC Housing Needs	£3,405	£0 (£3,125 paid in 20/21)	£12,500	<b>£15,905</b>	This funds part of staff members' salaries for specialist work with ESC Housing Needs.
NCA Help to Claim / Universal Credit	£25,843	£25,558	£33,632	<b>£85,033</b>	Project funding renewable annually.
Social prescribing / 'Community Connectors' (Consortium with Access Community Trust)	£27,849	£13,675		<b>£41,524</b>	Project funding renewable annually. CANES is not part of this consortium (see below).

<i>Income: 2019/20 financial year</i>	Felixstowe	Leiston	CANES	Total	Comments
Social prescribing 'Solutions' project			£72,800	<b>£72,800</b>	Project funding renewable annually. CANES 'Solutions' project funds 1 day/week per surgery in Lowestoft (8 GP surgeries) + referrals 2.2FTE + admin support + management & office overheads.
NCA energy advice project	£7,253			<b>£7,253</b>	
Coronavirus funding		£15,000		<b>£15,000</b>	Provided by Suffolk Community Foundation and Suffolk CCGs, plus Rope Trust contribution to food bank.
South Norfolk grant			£4,000	<b>£4,000</b>	Not continued in 2020/21
MAS (debt advice)			£52,782	<b>£52,782</b>	Only CANES has a contract with MAS, under a Participant Agreement with NCA. We understand that both Felixstowe and Leiston have now been offered contracts as well, each worth £45,800 pa.
Rope Trust	£32,000	£30,000	£5,210	<b>£67,210</b>	Rope Trust are long term supporters of local (Suffolk) CABs. They have funded CANES in previous years but not in 2019/20.
Big C			£6,760	<b>£6,760</b>	Specialist support worker 0.2 FTE.
Other grants and donations	£7,792		£12,775	<b>£20,567</b>	CANES includes £10,000 from Beccles Townlands Trust.
Room hire			£6,071	<b>£6,071</b>	Potential for CANES to increase this.
Capital for building			£28,217	<b>£28,217</b>	CANES only, re owned premises. Offset by £26,000 expenditure, leaving £2,000 net income.
Other	£7,055	£4,358	£10,443	<b>£21,856</b>	
<b>Total</b>	<b>£205,140</b>	<b>£194,025</b>	<b>£386,409</b>	<b>£785,574</b>	

#### 5.4 Expenditure

The main categories of expenditure are given in the table below and the main components are then analysed further.

<i>Expenditure for the 2019/20 financial year</i>	Felixstowe	Leiston	CANES	Total	Comments
Staffing	£117,821	£110,830	£258,236	<b>£486,887</b>	See 'staff costs' below.
Premises	£18,593	£17,141	£48,613	<b>£84,347</b>	See 'premises costs' below.
Audit and accountancy	£1,877	£775	£2,232	<b>£4,884</b>	

<i>Expenditure for the 2019/20 financial year</i>	Felixstowe	Leiston	CANES	Total	Comments
Client disbursements	£1,635			<b>£1,635</b>	Payments to clients.
Capital building costs			£26,113	<b>£26,113</b>	Grant to improve the lighting and heating in the main office – fully offset by income.
Other	£30,368	£20,738	£36,488	<b>£87,594</b>	See 'other costs' below.
Depreciation	£3,533	0	£6,000	<b>£3,533</b>	
Loan repayment			£20,000		
<b>Total</b>	<b>£173,837</b>	<b>£149,484</b>	<b>£397,682</b>	<b>£721,003</b>	

#### 5.4.1 Staff costs, numbers and roles

Staff costs account for 70% of total expenditure for the three CABs combined – slightly more for Leiston (74%) and slightly less for Felixstowe (68%).

Staff roles and specialisms reflect both the types of projects that are being funded and the different ways in which the CABs are organized, as below. There is a good range of different skills across the CABs, and cost-effective use of part time working with Leiston perhaps being the stand-out in this respect.

The staff numbers and roles below have been affected by Covid-19 and may be subject to further revision by the Chief Officers.

##### *Felixstowe*

Felixstowe have 7 members of staff (approximately 4.8 FTEs based on a 35 hour working week), including a full time Community Connector role which is funded by the Social Prescribing project.

Role	PT/FT
Chief Officer	PT 32 hours pw
Deputy Manager & Training Supervisor	PT 24 hours pw
Financial Capability & Outreach worker	PT 24 hours pw
Money Adviser	PT 24 hours pw
Help-to-Claim Adviser	PT 10hours pw
Money Adviser	PT 6 hours pw
Community Connector	FT 37 hours pw

##### *Leiston*

Leiston have 11 members of staff, several of whom (including the CO) are on flexible contracts. They estimate the equivalent of 4.0 FTEs based on a 37.5 hour week (4.3 FTEs using a 35 hour working week).

Role	PT/FT
Chief Officer	PT flexible contract
Admin Assistant	15 hours pw
Deputy Manager - employment and housing, IT support, supervisor	PT 3/5
Deputy Manager - benefits, Help to Claim, supervisor	PT 3/5
Assistant session supervisor	8 hours pw
Money Adviser	10 hours pw
Money Adviser	12 hours pw

Role	PT/FT
Help to Claim adviser (face to face)	12 hours pw
Help to Claim adviser (telephone)	5 hours pw
Outreach Co-ordinator	Approximately 7.5 hours pw Zero hours contract
Community Connector	18.75 hours pw

### CANES

CANES have 14 members of staff, equivalent to approximately 10.6 FTEs based on a 37 hour working week or 11.2 FTEs using a 35 hour working week.

Role	PT/FT
Chief Officer	FT
Administrators * 2	24 hours pw each
Training Co-ordinator / advice session supervisor / QAA lead / caseworker	FT
Advice session supervisor / caseworker and outreach	FT
Advice session supervisor	30 hours pw
Advice session supervisor / specialist adviser / caseworker and outreach (debt and benefits specialist)	FT
Advice session supervisor (self-employed)	0.6 FT
Specialist adviser	FT
Caseworkers and Outreach * 2 (all caseworkers have specialist skills, especially re benefits)	22 hours pw each
Caseworker and Outreach part funded by ESC (debt, benefits and housing specialist) (0.4 ESC Housing Options Team, 0.6 HtC)	FT
Caseworker and Outreach (self-employed)	0.6 FT
Social prescribing link worker	FT
Community Facilitator	22 hours pw

### 5.4.2 Premises costs

Premises costs account for 12% of the total expenditure of the three CABs combined.

#### Felixstowe

- The lease on the main building in Orwell Road, Felixstowe expired in June 2020 and a new lease is being drawn up for a nine year period with break clauses every three years. The agreement of a new lease has been delayed by the death of the landlord and probate has yet to be granted.
- Total rent payable for 2019/20 was £11,086. This is expected to rise to £12,000 under the new lease, with the landlord taking full repairing responsibility.

#### Leiston

- Citizens Advice occupy a suite in a large commercial (Grade 2 listed) building, Colonial House, at an annual rent of £6,580.
- Premises in Saxmundham are free of charge in the town hall building.



**CANES**

CANES operate from premises in Lowestoft, Beccles and Bungay:

- St. Margaret's House Lowestoft NR32 1JQ was purchased from SCC for £100,000 in 2016. At the time it was valued at £180,000. Final payments on the loans (interest free, taken directly from the grant) are due in October 2020, after which the building will be owned outright.
- 12, New Market Beccles NR34 9HB are ex-bank premises owned by Beccles Townlands Charity who purchased the property specifically to lease to CANES - commencement date 30<sup>th</sup> November 2010 initial period 12 years. The rent is £19,200 pa, partly offset by a £10,000 annual donation from the landlord.
- 8, Chaucer Street Bungay NR35 1DT is privately owned. CANES's lease has devolved to a 'periodic lease' with rent of £4,680 p.a. and a minimum 6 months' notice required. There are discussions with the town council about a services hub with other agencies in Bungay.

See section 5.3.2 for income earned from these premises.

**5.4.3 Other costs**

Other costs are as below. Note that the CABs have different accounting systems and the amounts below may comprise different items and may not be directly comparable.

<i>Other costs for the 2019/20 financial year</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Total</b>
Telephone	£2,799	£1,625	£9,092 Includes landlines at 4 premises, 5 mobile phones for outreaches	<b>£13,516</b>
Office, printing, postage and stationery	£4,705	£3,526	£7,356	<b>£15,587</b>
Miscellaneous	£2,517	£1,862	£4,560 Includes band 5 membership fees £4,094	<b>£8,939</b>
Training	£881	£40 Volunteer trainer used. Some courses accounted for elsewhere.	£2,538	<b>£3,459</b>
Computing / IT Support	£4,847	£9,191 Includes laptops for remote working in lockdown	£4,971	<b>£19,009</b>
Publications and subscriptions	£4,393	Not recorded	£749	<b>£5,142</b>
Travel	£6,227	£4,494	£7,222	<b>£17,943</b>
Equipment leases	£3,999			<b>£3,999</b>
<b>Total</b>	<b>£30,368</b>	<b>£20,738</b>	<b>£36,488</b>	<b>£87,594</b>

**5.5 Volunteers**

Volunteer numbers vary and it is not yet clear how many will return to volunteering after the lockdown. The CABs have told us that their volunteer numbers are:

- 34 for Felixstowe.
- 25 for Leiston plus 11 trainees
- 31 for CANES plus 5 trainees.

This adds up to some 90 volunteers across the three CABs, plus trainees.



Usage of volunteers varies, for example:

- Felixstowe use volunteer supervisors while the other two CABs do not.
- Volunteers support different types of admin activity.
- All CANES's outreaches are carried out by paid staff (under contract), while the other two CABs use volunteers at outreaches.
- Leiston uses a volunteer as training co-ordinator, which reduces training costs.

## 5.6 Locations

### 5.6.1 Town centres

All three CABs operate from main premises close to the town centre of their respective bases. The town centres are of different sizes and populations (source: ESC website): Lowestoft's population is 48,985 (or 70,000 if some suburbs are included); Felixstowe 23,689; and Leiston 5,508. In addition, CANES have offices in Beccles (population 10,123) and Bungay (5,127).

### 5.6.2 CAB locations and outreaches

CAB locations and outreaches are shown on a map of East Suffolk at **Annex 2**. This shows a good coverage across East Suffolk, but inevitably there are inconsistencies over the populations covered and the frequency of opening hours in different locations.

The table below shows the CAB presence (both main offices and outreaches) for the main parishes within East Suffolk, as below. These parishes cover some 185,000 (74%) of the population. The population estimates are from Suffolk Observatory's Population Report 2018.

Town	Population	CAB presence	Frequency and comments
Lowestoft	<b>58,274</b>	CANES office	9-5, 5 days pw
Felixstowe	<b>24,590</b>	Felixstowe CAB head office	5 days pw
Kesgrave	<b>14,823</b>	Ipswich CAB head office (closer than Felixstowe)	Felixstowe tried the Community Centre but little interest shown
Beccles	<b>10,357</b>	CANES office	Four days pw
Carlton Colville (Lowestoft)	<b>9,037</b>	Close to CANES office	Lowestoft 5 days pw (see above)
Woodbridge	<b>7,863</b>	Two outreaches from Leiston (one jointly with Felixstowe)	Two days pw total. Prior to lockdown they were talking about more provision
Martlesham	<b>5,793</b>	Closer to Ipswich than Felixstowe	No CAB presence but accessible from Ipswich and Felixstowe
Leiston	<b>5,743</b>	Leiston CAB head office	Five days pw
Bungay	<b>5,122</b>	CANES office	Two days pw
Halesworth	<b>4,942</b>	Outreach from CANES	One day pw
Saxmundham	<b>4,483</b>	Outreach from Leiston	One day pw in Town Hall. Not much demand according to Leiston CAB.
Kessingland	<b>4,432</b>	A few miles from CANES office	Lowestoft 5 days pw, plus a local outreach (one day pw).
Oulton (Lowestoft)	<b>4,409</b>	Close to Lowestoft	Lowestoft 5 days pw
Melton (Woodbridge)	<b>3,965</b>	Two outreaches in Woodbridge	No CAB presence but covered by Woodbridge
Worlingham (Beccles)	<b>3,835</b>	Close to Beccles	Four days pw (Beccles)

Town	Population	CAB presence	Frequency and comments
Trimley St Mary	3,788	Adjacent to Felixstowe	5 days pw (Felixstowe)
Framlingham	3,705	Outreach from Leiston	One day pw
Rendlesham	3,312	5-6 miles from Woodbridge	No CAB presence but this is considered a dormitory town with nobody there during the day
Aldeburgh	2,423	Outreach from Leiston	One day per month
Wickham Market	2,319	Outreach from Leiston	One day pw
Trimley St Martin	2,121	Close to Felixstowe	5 days pw (Felixstowe)
	185,336		

CANES have offices in Lowestoft, Beccles and Bungay; outreaches in Halesworth and Kessingland; 8 GP surgeries and the University Hospital in the Lowestoft area; and 'in-reaches' at two mental health facilities.

Felixstowe operate local outreaches in: Woodbridge (operated jointly with Leiston); and two GP surgeries, a Medical Centre, the library, the Job Centre and two local prisons.

Leiston operate outreaches in Saxmundham, Woodbridge (two locations, one operated jointly with Felixstowe), Aldeburgh, Alderton, Wickham Market and Framlingham.

## 5.7 Clients and issues

### 5.7.1 Client profiles

**East Suffolk clients are overwhelmingly white (95%),** which reduces the impact of the language, ethnicity and discrimination issues faced by many clients in other part of the UK. On the other hand, additional support services aimed at specific ethnic groups are lacking in Suffolk compared to other parts of the country.

**The proportion of clients with a disability or long-term health problem is 47% on average** – 40% in Felixstowe, 43% in Leiston and just over half in CANES. This is an indicator of the vulnerability of these clients and should be a factor in encouraging the CCGs to support the CAB service.

The proportion of clients aged 65 or over is 21% on average, with an even spread across the three CABs. It is interesting that **there are more than twice as many clients suffering from disability or long-term health problems compared to clients aged 65 or over.**

Client profile 2019/20	Felixstowe	Leiston	CANES	Average
% White	92%	96%	97%	95%
% Female	56%	60%	56%	57%
% with disability or long term health problems	40% (844 out of 2,111)	43% (742 out of 1,725)	52% (2,263 out of 4,352)	47% (3,849 out of 8,188)
% aged 65+	22% (469 out of 2,111)	24% (413 out of 1,725)	20% (850 out of 4,352)	21% (1,732 out of 8,188)

Carrying out the same analysis for the lockdown period gives slightly different results (the right-hand column shows the full year 2019-20 figures for comparison): The proportion of female clients hardly changed.

- The proportion of white clients dropped from 95% to 90%, probably because Felixstowe and to a lesser extent Leiston have taken national overflow calls during lockdown.
- The proportion of clients with disability or long-term health problems hardly changed, although CANES rose to 55% of all clients.

- **The proportion of clients aged 65 and over fell from 21% to 12% during the lockdown**, suggesting that these clients may be more dependent on face to face services and could have a backlog of issues to address when the lockdown ends. CANES have offered an alternative explanation: in their view a) the number of younger clients has increased during lockdown; and b) older people's income may not have been adversely affected by lockdown in the same way as for other age cohorts.

<i>Client profile April to July 2020 (during lockdown)</i>	<b>Felixstowe</b> (includes national overflow)	<b>Leiston</b>	<b>CANES</b>	<b>Averages during lockdown</b>	<b>Averages during 2019/20</b>
% White	81%	89%	96%	<b>90%</b>	<b>95%</b>
% Female	60%	59%	56%	<b>58%</b>	<b>57%</b>
% with disability or long term health problems	38% (377 out of 991)	44% (406 out of 923)	55% (706 out of 1,283)	<b>46.5%</b> (1,489 out of 3,197)	<b>47%</b> (3,849 out of 8,188)
% aged 65+	10% (104 out of 991)	11% (105 out of 923)	14% (174 out of 1,283)	<b>12%</b> (383 out of 3,197)	<b>21%</b> (1,732 out of 8,188)

### 5.7.2 Numbers of clients and issues

The figures below show that the three CABs between them saw just over **8,000 clients during the year**, dealing with some 29,000 issues (**3.5 issues per client on average**).

Activities are the number of interventions through any delivery channel - face to face, phone, email etc. – and as such they represent the workload of each CAB. **On average there were 3 activities per client over the year.** These figures are for all clients, not core funded clients.

Leiston's client numbers were reduced compared to 2018/9, due to staff disruption and changes in reporting. The CO has advised that their staff complement is now up to strength.

<i>Key numbers 19/20</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Total</b>
Clients	2,111	1,725	4,352	<b>8,188</b>
Issues	8,292	5,387	15,473	<b>29,152</b>
Activities	6,354	5,376	12,958	<b>24,688</b>
Issues per client	3.9	3.1	3.5	<b>3.6</b>
Activities per client	3.0	3.1	3.0	<b>3.0</b>

To assess the impact of Covid-19 on workloads, we compared the four months from April to July 2020 with the corresponding period in 2019.

**The number of clients and issues, in total across the three CABs, were little changed compared to the previous year – a tribute to the adaptability of the CABs.** Within those totals, Leiston and Felixstowe dealt with significantly more clients and CANES with significantly fewer clients than in the corresponding period last year (CANES report a significant falling off of debt issues, probably due to government policy on evictions and debt collections by creditors). CABs reported significant demand from Help to Claim clients, especially for Universal Credit.

**Leiston and Felixstowe CABs have told us that their figures do not include social prescribing clients, because these are separately recorded by Access Community Trust and do not appear on Casebook.**

<i>Key numbers during lockdown, April to July 2020</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Total</b>
Clients	991	923	1283	<b>3197</b>
Issues	3025	2119	4588	<b>9732</b>
Activities	1914	3239	4648	<b>9801</b>

<i>Key numbers April to July 2019 for comparison</i>	Felixstowe	Leiston	CANES	Total
Clients	865	721	1698 (April 2019 was unusual – 521 cases, reason not known)	<b>3284</b>
Issues	2882	2039	4806	<b>9727</b>
Activities	2221	2354	4143	<b>8718</b>

### 5.7.3 Types of issues

The issues dealt with are shown below. **Benefits (39%) was by far the most common group of issues**, followed by debt (19%), housing (8%), employment (6%) and relationships and family (6%).

There were few standout differences between the three CABs, although Lowestoft had relatively more debt cases and fewer employment cases than the other two.

<i>Client issues 2019-20</i>	Felixstowe	Leiston	CANES	Total
<i>Benefits and tax credits</i>	<i>2,279</i>	<i>1,160</i>	<i>3,256</i>	<i>6,695</i>
<i>Benefits Universal Credit</i>	<i>1,276</i>	<i>711</i>	<i>2,782</i>	<i>4,769</i>
Benefits total	3,555 (43%)	1,871 (35%)	6,038 (39%)	<b>11,464 (39%)</b>
Debt	1,032 (12%)	840 (16%)	3,679 (24%)	<b>5,551 (19%)</b>
Housing	628 (8%)	567 (10%)	1,177 (8%)	<b>2,372 (8%)</b>
Employment	601 (7%)	424 (8%)	677 (4%)	<b>1,702 (6%)</b>
Financial services and capability	251 (3%)	153 (3%)	452 (3%)	<b>856 (3%)</b>
Relationships and family	668 (8%)	441 (8%)	697 (5%)	<b>1,806 (6%)</b>
Health and community care	152 (2%)	132 (2%)	619 (4%)	<b>903 (3%)</b>
Legal	338 (4%)	219 (4%)	448 (3%)	<b>1,005 (4%)</b>
Consumer goods and services	210 (2%)	182 (3%)	292 (2%)	<b>684 (2%)</b>
Utilities and communications	284 (3%)	131 (2%)	281 (2%)	<b>696 (2%)</b>
Travel and transport	152 (2%)	122 (2%)	289 (2%)	<b>563 (2%)</b>
Other	421 (5%)	305 (6%)	824 (5%)	<b>1,550 (5%)</b>
<b>Total</b>	<b>8,292</b>	<b>5,387</b>	<b>15,473</b>	<b>29,152</b>

The same analysis for the 4 months of lockdown is shown below. The right-hand column shows the relative percentages for each issue for the previous year, for comparison.

**The differences in client issues during lockdown were relatively minor**, with benefits still by far the most common issue. There were declines in debt cases, especially in Felixstowe and Leiston, and an increase in the proportion of employment cases from 6% to 12% of the overall total.

<i>Client issues during lockdown, April to July 2020</i>	Felixstowe	Leiston	CANES	Total during lockdown	Totals for 2019-20 for comparison
<i>Benefits and tax credits</i>	<i>502</i>	<i>343</i>	<i>741</i>	<i>1586</i>	<i>6,695</i>
<i>Benefits Universal Credit</i>	<i>416</i>	<i>445</i>	<i>1,034</i>	<i>1,895</i>	<i>4,769</i>
Benefits total	918 (30%)	788 (38%)	1,775 (39%)	<b>3,481 (36%)</b>	<b>11,464 (39%)</b>
Debt	138 (5%)	159 (8%)	865 (19%)	<b>1162 (12%)</b>	<b>5,551 (19%)</b>

<i>Client issues during lockdown, April to July 2020</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Total during lockdown</b>	<b>Totals for 2019-20 for comparison</b>
Housing	404 (13%)	241 (12%)	377 (8%)	<b>1022 (11%)</b>	<b>2,372 (8%)</b>
Employment	546 (18%)	312 (15%)	353 (8%)	<b>1211 (12%)</b>	<b>1,702 (6%)</b>
Financial services & capability	66(2%)	35 (2%)	180 (4%)	<b>281 (3%)</b>	<b>856 (3%)</b>
Relationships and family	284 (10%)	170 (8%)	198 (4%)	<b>652 (7%)</b>	<b>1,806 (6%)</b>
Health and community care	64 (2%)	30 (1%)	295 (6%)	<b>389 (4%)</b>	<b>903 (3%)</b>
Legal	179 (6%)	86 (4%)	141 (3%)	<b>406 (4%)</b>	<b>1,005 (4%)</b>
Consumer goods and services	154 (5%)	73 (3%)	83 (2%)	<b>310 (3%)</b>	<b>684 (2%)</b>
Utilities and communications	38 (1%)	61 (3%)	38 (1%)	<b>137 (1%)</b>	<b>696 (2%)</b>
Travel and transport	54 (2%)	40 (2%)	59 (1%)	<b>153 (2%)</b>	<b>563 (2%)</b>
Other	180 (6%)	125 (6%)	224 (5%)	<b>529 (5%)</b>	<b>1,550 (5%)</b>
<b>Total</b>	<b>3,025</b>	<b>2,119</b>	<b>4,588</b>	<b>9,732</b>	<b>29,152</b>

## 5.8 Delivery channels

### 5.8.1 Pre Covid-19

The statistics below are for all activities carried out with or on behalf of clients, so for example they include letters and phone calls made or sent to third parties on clients' behalf. CANES have told us that about half of their letters were to third parties on clients' behalf, as were phone calls and emails. The face to face channel is entirely for clients who visit the CABs.

In the year before Covid-19, almost 50% of client activities were face to face. Phone was used for one third of clients in Felixstowe and Leiston but only by 13% in CANES, making the average for the three CABs just over one fifth of all activities (22%). The percentages are as stated on the dashboards and do not add to exactly 100% in all cases.

Email was little used (about 10%), less so than letters (about 15%). The volume of letters was surprising, especially in CANES where it was more than one fifth (22%) of all activities.

<i>Service delivery channels 2019/20 (before Covid-19).</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Totals and average % across all three CABs</b>
Face to face	3,369 (53%)	2,394 (45%)	6,048 (47%)	11,811 (48%)
Phone	2,004 (32%)	1,846 (34%)	1,704 (13%)	5,554 (22%)
Email	357 (6%) Lower due to email security issues	669 (12%)	1,593 (12%)	2,619 (11%)
Letter	587 (9%)	452 (8%)	2,914 (22%)	3,953 (16%)
Other	37 (0%)	15 (0%)	699 (5%) Text messages	751(3%)
<b>Total number of 'activities'</b>	<b>6,354</b>	<b>5,376</b>	<b>12,958</b>	<b>24,688</b>

### 5.8.2 During lockdown

The first four months of Covid-19 (April to July 2020) saw a very different picture, as below. The right-hand column repeats the totals and averages for 2019/20, as above, for easier comparison with the figures during lockdown. The percentages are as stated on the dashboards and do not add to exactly 100% in all cases.

There were no face to face interviews with clients. Much of the slack was taken up by phone calls (57% on average compared to 22% in 2019-20). Felixstowe handled almost three quarters (74%) of activities in this way, partly because of taking overflow calls from the national phone help line. Leiston also took some overflow calls from the Suffolk AdviceLine system.

The proportion of email activities also increased to 29% on average, compared to 11% in 2019-20. The proportion of letters declined for each of the CABs (10% compared to 16%).

<i>Service delivery channels April-July 2020 (during lockdown)</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>	<b>Totals &amp; average % across all three CABs During lockdown</b>	<b>Totals &amp; average % across all three CABs 2019/20 (as above)</b>
Face to face	0%	0%	0%	0%	11,811 (48%)
Phone	1,424 (74%)	1,808 (56%)	2,356 (51%)	5,588 (57%)	5,554 (22%)
Email	316 (17%)	1,204 (37%)	1,357 (29%)	2,877 (29%)	2,619 (11%)
Letter	148 (8%)	189 (6%)	615 (13%)	952 (10%)	3,953 (16%)
Other	26 (1%)	38 (1%)	320 (7%)	384(4%)	751(3%)
<b>Total number of 'activities'</b>	<b>1,914</b>	<b>3,239</b>	<b>4,648</b>	<b>9,801</b>	<b>24,688</b>

### 5.8.3 Telephone services

There are differences in the way the three CABs provide telephone services:

- Felixstowe: on AdviceLine as a separate CAB; have answered national overflow calls for NCA during the lockdown.
- Leiston: on the Suffolk AdviceLine (with Ipswich, West Suffolk and Sudbury). They say that most contacts come via the 01728 local number.
- CANES: not on AdviceLine but intend to move to it.

### 5.8.4 The role of face to face delivery

It has been suggested that, to put it simplistically, the lockdown experience has enabled CABs to develop remote ways of working and there will no longer be a need for face to face interviews post Covid-19.

The first part of this is true – CABs have developed better ways of remote working during the lockdown.

The second is not – there will be an ongoing need for face to face services, and probably a backlog of such cases when the offices reopen.

Clients who need face to face interviews are likely to include:

- Those with communication problems, for example due to language difficulties, speech impediments.
- Those who are uncomfortable with phones and do not have internet access or capability. Analysis elsewhere in this report shows, unsurprisingly, that this significantly reduced the number of clients of 65 and over during the lockdown period.
- Clients with complex problems.
- Clients with mental health problems.
- Debt clients have to prepare a debt pack with documentation, which is heavy and expensive to post.



This is not to say that face to face provision should continue as before. Possible changes include:

- Making it more available in locations where people visit in their daily lives, rather than mainly in town centres.
- Rationing this scarce resource so that it cannot be over-used by 'regular' clients.

### 5.8.5 Other operational issues

Felixstowe operate Gateway assessments, where clients are triaged and those that cannot be dealt with quickly are asked to come back to see an adviser at a later date.

This approach is probably better suited to Felixstowe than the other two CABs because there are relatively fewer clients with long travel times into the main CAB office.

## 5.9 Performance

### 5.9.1 Outcomes for clients

The outcomes for clients shown on the dashboard are hard to interpret, showing major differences that cannot be explained by any obvious differences in clients, issues or services provided.

It seems likely that **the CABs have not been recording all the outcomes achieved, and that they are recording debt outcomes in different ways**. They may also demonstrate different approaches to debt solutions for clients, for example whether clients should apply for debt relief orders.

One issue that can distort the outcome statistics is whether to record benefit income for clients who have only been advised or helped to make a claim, or to wait until the client advises that the claim has been accepted. CABs approach to this issue can vary, making the statistics hard to compare.

For reference, the dashboard statistics for 2019-20 are shown below.

<i>Outcomes achieved 2019-20</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>
Income gains	£443,039	£65,612, but see current year below	£712,706
Re-imbursements, services and loans	£2,230	£11,319	£34,776
Debts written off	£46,704 (likely to be under-stated)	£318,813	£887,656
Repayments rescheduled	£75,337	£5,988	£27,156

The outcomes for the four lockdown months show a different picture, with Felixstowe and Leiston focusing more on achieving income gains for clients.

<i>Outcomes for the four months April – July 2020</i>	<b>Felixstowe</b>	<b>Leiston</b>	<b>CANES</b>
Income gains	£1,575,000	£387,696	£175,937
Re-imbursements, services and loans	£37,669	£10,208	£216
Debts written off	£5,471 (policy not to apply for debt relief orders in this period)	£169,157	£180,332
Repayments rescheduled	£28,827	£288 (less pressure by creditors during lockdown)	£3,511

### 5.9.2 Financial value to society

NCA's systems calculate benefits to society using a financial model 'approved by the Treasury'. As explained above, the data are based on uncertain inputs and are not a valid basis to compare the three CABs.

Nevertheless, the results make a strong case for the value of CAB work and **this may not be sufficiently publicised by the East Suffolk CABs, especially in emphasizing the value that they create together across the District.**

Year 2019-20	Felixstowe	Leiston	CANES	Combined totals
Fiscal benefit	£0.9m (£4.86 per £1 invested)	£0.7m (£3.85 per £1 invested)	£1.7m (£4.54 per £1 invested)	<b>£3.3m</b>
Public value	£5.9m (£31.05 per £1 invested)	£4.8m (£26.22 per £1 invested)	£13.9m (£36.07 per £1 invested)	<b>£24.6m</b>
Value for clients	£4.4m (£23.49 per £1 invested)	£3.2m (£17.51 per £1 invested)	£10.8m (£27.99 per £1 invested)	<b>£18.4m</b>

Statistics are also provided for making specific arguments to key stakeholders, of which a sample is given below.

Year 2019-20	Felixstowe	Leiston	CANES	Combined totals
Savings to local authority by preventing homelessness and housing evictions	£107,208	£83,879	£238,995	<b>£430,082</b>
Savings to NHS by reducing use of mental health and GP services and keeping people in work	£121,278	£99,335	£280,735	<b>£501,348</b>
Savings to DWP by keeping people in work	£443,575	£341,594	£629,792	<b>£1,414,961</b>
Savings to housing providers by preventing evictions	£235,502	£176,738	£579,793	<b>£992,033</b>

We have not seen any statistics to show the value of CABs' work to police commissioners, but this could also be interesting.

**Statistics such as these (perhaps adjusted to make the basis more transparent and credible to donors) could play more of a role in building relationships with potential donors,** based on evidencing outcomes that contribute directly to meeting the donors' objectives.

## 5.10 Governance

All three CABs have achieved green 'leadership self-assessment' scores, which are essentially their own assessments validated by NCA, through a reportedly vigorous and challenging process. The year 3 assessment (done for CANES) involves a detailed audit by NCA.

There are 23 trustees in total, with a good mix of skills, with nominees from both SCC and a district council of each board.

	Felixstowe	Leiston	CANES
Number of trustees at 31/3/20	8 plus 'observers' from SCC and ESC	8 (2 vacancies) plus 'observers' from SCC and ESC	7 plus nominees from SCC and ESC
Leadership self-assessment score	Green (year 1)	Green	Green (year 3)

## 5.11 SWOT Analysis

The three CABs, although their differences may sometimes take centre stage, have more similarities than differences, as reflected by the number of strengths, weakness, opportunities and threats that they have in common.

We have not commented on the strengths and weaknesses of specific CABs because a) we have not examined them in detail and b) and this would pose a risk of diverting attention from the main purpose of our report.



<b>Strengths</b> <ul style="list-style-type: none"> <li>▪ Chief Officers who by reputation and from our dealings with them are highly committed and capable.</li> <li>▪ Experienced staff and volunteers.</li> <li>▪ Low turnover of volunteers.</li> <li>▪ Healthy finances, with annual surpluses and good reserve cover.</li> <li>▪ High standards that are required and reinforced by NCA membership.</li> <li>▪ Good relationships with the local authority, DWP and other agencies.</li> </ul>	<b>Weaknesses</b> <ul style="list-style-type: none"> <li>▪ Funding that is increasingly unreliable, project based (i.e. temporary) and influenced by funders' requirements.</li> <li>▪ NCA membership requirements can be onerous, especially as regards quality checking.</li> <li>▪ Piecemeal co-operation with other local CABs.</li> <li>▪ Different approaches to telephone advice, email and webchat.</li> </ul>
<b>Opportunities</b> <ul style="list-style-type: none"> <li>▪ Probable increased demand for CAB services post Covid-19 (an opportunity and a threat).</li> <li>▪ Better use of different delivery channels.</li> <li>▪ Better use of outreach locations.</li> <li>▪ Maximising co-operation with councils.</li> <li>▪ More preventative interventions, catching clients early before their problems escalate.</li> <li>▪ Maximising opportunities for co-operation with other agencies.</li> <li>▪ Better use of information to demonstrate CABs' impact.</li> </ul>	<b>Threats</b> <ul style="list-style-type: none"> <li>▪ Further reductions to core funding, especially from SCC.</li> <li>▪ Limited resources potentially being swamped by 'regular' clients who understand the CAB system. (this is not agreed by all the CABs).</li> <li>▪ Pressures to merge could result in a loss of local identity and change working practices that, although they may not be optimal, are still highly effective.</li> <li>▪ Mergers could lead to loss of volunteers and their expertise in supporting clients in their areas. (this point was added by one of the CABs).</li> </ul>

## 6. EXPECTED FUTURE DEMAND FOR CAB SERVICES

### 6.1 Covid-19

Chairs and COs have spoken of pent up demand which could generate 'a tidal wave' of problems post Covid-19, especially:

- Debt problems for clients who have lost their jobs as a result of Covid-19.
- Housing as the bailiffs are going to be knocking on peoples' doors.
- Furlough will end leading to more unemployment.
- The evictions holiday will also end.

CABs do not expect to process the same number of face to face clients as before. One CAB forecasts a reduction to 50% of previous levels.

ESC's Community Partnerships Board Meeting (June 2020), covered the potential impacts of Covid-19 in some detail, and the key points are reproduced from ESC's slides as **Annex 3**. This piece of work comprehensively illustrates the potential impacts of Covid-19 and the need for CAB and other agencies to play a part in alleviating them. The areas impacted are:

- Population and deprivation.
- Health and wellbeing.
- Employment and economy.

- Housing and welfare support.
- Communities and inequality.

## 6.2 Sizewell C

A planning application to build the Sizewell C nuclear reactor at Sizewell, on the Suffolk coast close to Leiston, was submitted to the Planning Inspectorate in June 2020.

The EDF company, which made the planning application, has said that construction of the plant would create 25,000 jobs and 1,000 apprenticeships, and that the site would employ 900 staff once operational.

Leiston CAB have estimated that 9,000 jobs would be created by the construction of the site. Estimates suggest that the site could take between 9 and 12 years to construct.

If the plan goes ahead, this will both increase demand for CAB services, mainly in the Leiston area, and create additional opportunities for funding.

## 6.3 Felixstowe

The port of Felixstowe employs some 2,500 staff, plus a multiplier for supply chain roles. The impact of Brexit remains to be determined but some upheaval can be expected with potential consequences for CAB workloads.

## 7. EXPERIENCES OF OTHER CABS THAT HAVE RECENTLY MERGED

We spoke to the Chief Officers of four CABS that have recently merged – Bournemouth, Christchurch and Poole (BCP), West Suffolk, South Essex and Sheffield. The logistics of talking to busy Chief Executives of merged CABS meant that we had to cover the main points in about an hour in each case, hence there are some gaps in the table below where particular issues were not discussed. However, some strong points were made, as recorded in the table.

BCP and South Essex were of a similar size to East Suffolk in terms of income and expenditure at the time of merger, though they have grown since then. West Suffolk were slightly smaller, and Sheffield were considerably larger. The number of CABS involved in each merger was between three and five in each case.

### *Benefits of mergers*

- Cost savings were not a major factor and were hard to measure.
- Relationships with councils improved and core funding became more secure.
- New opportunities developed for project funding.
- Overall, financial resilience improved.
- The range of services and specialisms offered to clients improved.
- All four of the merged CABS made their operations more consistent across the whole area, taking the practices that worked best from each of the legacy CABS.
- Three of the four CABS reported stronger Trustee Boards post-merger.
- Three of the four CABS reported additional collocations, with councils and/or other VSOs, post-merger.
- The larger organisations enabled better career progression for staff, with opportunities across a wider area.

### *The merger process*

- 'The will to do it has to be there'. Each of the legacy CABS needs to buy in to the merger, if it is to be successful.

- 18 months was the shortest time taken to complete the mergers. In some cases, merger issues are still being worked through many years later.
- The merger process takes time and effort and may distract key staff from their day-to-day roles.
- The CABs did most of the work themselves. Working groups played a key role in some cases.
- It was important to have the right people - 'a coalition of the willing' - to do the work.
- Communication with both staff and volunteers was crucial.
- It was possible and desirable in some cases to maintain the local identity of the legacy CABs for operating purposes, while operating under one merged legal framework.

#### *Back to back mergers*

We had considered whether to recommend that two of the East Suffolk CABs (Felixstowe and Leiston) should merge first because they probably have more in common with each other than with CANES. The initial merger of two CABs could be followed by a further merger with CANES at a later date.

Two of the four CABs we spoke to had gone through successive, back to back mergers and we discussed the issues with them. They did not recommend back to back mergers and the key point they made was that much of the work has to be done twice instead of once. If new systems, processes and methods of working have begun to bed down from the first merger, they then have to be revisited for the second merger. **Given the option, they would choose to carry out one merger process rather than two.**

Table comparing Merged CAB Experiences	Bournemouth, Christchurch, Poole (BCP)	West Suffolk (WS)	Sheffield	South Essex
<i>General</i>				
Timing of mergers	2017-19	2011-12 and 2019	2013	2018-19
Scope	3 CABs.	3 CABs, another joined later.	5 CABs (mostly 8-10 staff), 6 other advice agencies, one law centre.	5 CABs of mixed sizes.
Councils	BCP unitary council, same area as the merged CABs.	WS district councils merged at the same time.	Sheffield City Council (Metropolitan BC). Threat of withdrawal of council funds motivated the merger.	Thurrock unitary council, Essex County Council and four Tier 2 local councils.
Combined income pre-merger	About £700,000	Not known	Doubled in size so £2million?	About £700,000
Total income post-merger	£947,000 last year, more this year	£447,000 last year	£4.1million last year	About £900,000 last year
<i>Cost implications</i>	<i>More costs than benefits – ‘the merger hit reserves badly’</i>		<i>Difficult to ascertain</i>	<i>Not the main reason for merger</i>
Chief Officers	2 * £30-35,000 saved, but the new CO cost £48,000 and new deputies were appointed	3 * CO salaries saved but other senior roles created.	More complex, bigger operations so more expensive staff.	Chief Officers continued to be involved in other senior roles as a management team.
Staff	Some redundancies. More staff needed due to decision not to use volunteers in outreaches	One redundancy	No redundancies	Very little turnover
Premises	Gradual savings from sharing premises			Collocations in council offices at Basildon and Brentwood, with Job Centre and others.
Governance	Minor savings	Minor savings	One audit, one set of fees, but marginal savings.	Minor savings
Back office systems	Some phone / IT replacements but costs not significant.	Different IT and phone systems, cost to update.	Early merger of IT systems, phones. Took longer to get a single VOIP system.	
Marketing		Some marketing costs		Some marketing/rebranding costs
<i>Funding</i>				
Core funding	Better relations with the Council resulted in 3 years (core) grant funding.	Better relationship with council.	£800,000 from council out of £2million.	Better relationship with councils.

Table comparing Merged CAB Experiences	Bournemouth, Christchurch, Poole (BCP)	West Suffolk (WS)	Sheffield	South Essex
Project funding	Massive advantage opened up major funding opportunities. Bigger projects, bigger impacts.	More professional approach pays dividends with all funders.	Bigger offer, more consistent. Still project funding, enough different projects to smooth over years. Big expansion of funding types.	New opportunities. Extended the MAS contract across the whole area – could not have happened without the merger.
Resilience	Greatly increased	More secure	Funding more secure, less hand to mouth, more resilient operation.	Improved
Relationships	Greatly improved, with Council and other VSOs	Helpful to have a larger area when dealing with people.	Enabled an immediate, joined up response to Covid-19 in Sheffield. Close relationships strategically and operationally. Easier with a unitary authority.	Greatly improved, especially with DWP due to collocation. They represent one third of the county's population 'so have a big voice at the table'.
<i>Governance</i>				
Trustee Board (TB)	Stronger Board, better balance of people and skills, clearance of some long serving trustees.	Better quality trustees post-merger. Representation for each CAB on the Trustee Board.	Shadow Board appointed. Not all trustees in support, including doubts amongst the chairs.	30 applicants for 15 TB roles, they selected the most active ones. An even representation from each CAB. with Chair, VC and Treasurer drawn from different CABs. Added two sub-committees (Finance and Development) to deal with additional workloads.
Professionalism	They made it more formal, more like a business.	More professional approach paid dividends with funders.		
<i>Services</i>				
Range of services	Expanded range of services, more specialist staff	Better services to clients now. Hugely increased the range of projects.	Big improvements but can still not deliver to really excluded people e.g. language barriers, people with no money, no food, deaf community. Helping more now.	
Delivery channels			Still a role for face to face but on a smaller scale.	The future is unpredictable but face to face should be for those who need it, not those who want it. Starting to reopen offices, bit by bit, since late August.

Table comparing Merged CAB Experiences	Bournemouth, Christchurch, Poole (BCP)	West Suffolk (WS)	Sheffield	South Essex
				We should do as much as possible at first point of contact, including advice line.
Processes and ways of working	Consistent approach developed.	Common processes developed from the ones that worked best pre-merger.	More consistent approach developed.	Went through every system and every process. Good processes in certain areas, picked out the best. Developed one consistent approach to triage and what can be done at initial client contact.
<i>People</i>				
Staff	Some loss of staff	Higher quality staff, better career progression, able to hire specialists.	Moved staff to single set of T&Cs and roles with consistent job descriptions and salary bands. Enables deployment of existing staff across projects instead of employing new people / project.	Staff were offered new contracts with more flexible roles, good uptake. Improved career opportunities – pay bands, performance related pay.
Volunteers	Some loss of volunteers (though volunteer numbers are higher now than pre-merger)	No losses. Volunteers work locally though training is centralised. Issues may not be 'nipped in the bud' as quickly as before.	Mainly attached to local offices.	Mix of local and more mobile volunteers.
Training and development		Now centralised.		Now done more consistently across the region. Where delivery issues exist (e.g. Help to Claim issues around delivery, quality, staff training), a bigger team can learn from each other.
<i>Premises</i>				
Collocation	Bournemouth premises shared with Council; others vary.	Bury premises shared with other VSOs.		Major advantages of collocation with councils and DWP, including easier client journeys, working relationships and referrals of vulnerable clients.

Table comparing Merged CAB Experiences	Bournemouth, Christchurch, Poole (BCP)	West Suffolk (WS)	Sheffield	South Essex
Office closures	None	None, local relationships would have been damaged.	Legacy issues. Covid-19 an opportunity to free up premises.	
<i>Merger process</i>				
Set up	Two separate mergers	Two separate mergers, Newmarket much later.	Set up the new organization first, then merged legacy CABs into it.	Two separate mergers
Timing	About 18 months	Took several years to fully merge systems etc.	Not complete 7 years on regarding cultural change.	About 18 months, still working on some issues.
Working groups	The main driver	Working party including managers, trustees NCA. One lead person for unified ways of working.		Policy set by a senior core team. Pilot studies were set up for operational aspects. Post-merger action plan, regular meetings.
NCA support	Not a significant factor	Helpful but not running the merger.		Helpful but not running the mergers.
<i>Lessons learned</i>				
Motivation	The will to do it has to be there	'A crucial aspect is there was a real willingness to merge'	Cannot assume common understanding across CABs	
Who to involve	People who are in favour of the merger and can get along with each other.		Partnership between trustees and council.	More outside help would have saved management time, but doing the work themselves gave them better understanding.
Project management	Mainly through the working groups.		Had to do it at speed, a more measured approach would have been good.	Working group of trustees and CEOs to work out whether to merge, communication plan, consultation with staff and vols.
Communication	Need regular and frequent updates, transparency is crucial	Kept people informed, monthly volunteer meetings	Could have been better	Communication plan - told everyone at the same time. Group staff meeting and volunteer meeting for each outlet, then saw all individually.
Localism		Each office retains its own identity. Trustees from each bureau area.		Original names (CA Thurrock, CA Brentwood etc.) are retained for operating purposes and staff and volunteers welcome this.

Table comparing Merged CAB Experiences	Bournemouth, Christchurch, Poole (BCP)	West Suffolk (WS)	Sheffield	South Essex
Strategy	Agree the vision, one consistent strategy, don't get stuck on minutiae.	One person led on unified ways of working.	Led by trustees, limited involvement from staff and volunteers. Vision was key. Clients just want service delivered.	Led by management team (and presumably trustees?).
Double mergers	Extra workload, avoid if possible.			Back to back mergers was a huge amount of work. Takes time to change processes, then revisit for the second merger. Need to run the day job as well.

### Merger of Bournemouth, Poole and Christchurch CABs

#### *Before the merger*

Before the merger there were three CABs, with Bournemouth the largest and Christchurch the smallest – combined income about £700,000 per year. A driver for the merger was the recent creation of a unitary council for the BCP area. A Chief Executive with relevant experience was brought in from outside the CAB service, at a higher salary than any of the existing Chief Officers.

#### *The merger process*

This took longer than expected because some key people did not want to merge – “the will to do it has to be there from all sides”. Teams of staff and volunteers led the process. Transparent communication was key.

#### *Results*

A larger organisation with 66 staff, 110 volunteers, more than £1million income and greater impact. More appeal to funders, closer cooperation with the council (three year core funding and multiple projects). Closer working and joint bidding with other VSOs. Premises collocated with the council.

### Merger of South Essex CABs

#### *Before the merger*

Five CABs, a mixture of large and small, urban and rural, combined income about £700,000 per year. Drivers for merger included financial difficulties for some CABs.

#### *The merger process*

A two-stage process, which increased workloads and meant that key issues such as staff roles, systems and processes had to be dealt with twice. Best practice from legacy CABs, identified and shared across the whole area. Local CAB identities retained for operating purposes.

#### *Results*

Collocation with the Council and DWP enabled: greatly improved understanding and relationships between all parties; cutting through ‘red tape’ for some clients and types of cases (for example discussing a benefits case with someone in the office, rather than initiating a formal challenge or appeal process); some vulnerable clients being referred to CAB by the council or DWP. Better funding opportunities. More influence because of speaking for a larger population within Essex.



## 8. EVALUATION OF OPTIONS FOR CHANGE

### 8.1 Introduction

We have evaluated the key options for the three CABs delivering Citizens Advice services across East Suffolk. The evaluation has used the extensive information gathered throughout the review. It has been crucial to have the support and contribution from the three CAB COs plus their colleagues and trustees, for which we are grateful.

The outcome of this review is clearly a critical and sensitive matter and we welcome a discussion with the CABs and ESC on our proposal and the rationale behind it. We have sought to understand the current situation and the likely future circumstances to enable the most resilient yet flexible Citizens Advice service in East Suffolk capable of meeting current and future needs, desires and ambitions of all the stakeholders involved.

Our evaluation utilises a qualitative and quantitative decision-making approach. This includes deploying a Decision Matrix tool – which in essence is a table that shows the options as columns mapped against the selected evaluation criteria as rows.

In addition, we include a narrative discussion that seeks to discuss the case for options based on: Continuing with three separate CABs or Merging two of the three CABs.

### 8.2 Options considered

These were introduced in our draft Emerging Findings report and are coded here as options A-E:

- A. Do nothing / retain three separate CABs.
- B. Merger of the three East Suffolk CABs.
- C. Partnership / consortium working across the three separate CABs.
- D. Merger of CANES and Leiston.
- E. Merger of Leiston and Felixstowe.

We describe each option, and make its case, later in this section. The theoretical merger option of NE Suffolk and Felixstowe is separately discussed and is not considered a practical or viable option.

### 8.3 Evaluation criteria

We devised the following criteria as a basis for evaluating each option:

- Quality of service to clients generally
- Access for vulnerable and disadvantaged clients
- Cost efficiency / value for money
- Income streams and funding
- Impact on staff and volunteers
- Council needs and expectations
- Culture and processes
- Principles and ethos of Citizens Advice
- Riskiness of the merger process.

These are each discussed below:

#### Quality of service to clients generally

The QAA scores for each of the three CABs demonstrate good quality of service for clients who access CAB services. **This should not be lost or put at risk.**

QAA scores only apply to clients who have received services from CABs. They do not address the issue of potential clients who have not received CAB services, both in deprived urban areas where the problem of unmet demand is obvious, and in rural areas where it can be more hidden. In terms of service to the community it is important to expand CAB services to meet as much of the demand as possible.

Quality of service could be improved by better links with councils and other VSOs, especially to identify clients who need help. This may enable clients to be helped before their problems escalate (for example from a manageable debt to rent arrears and threatened homelessness), and **anything that makes CAB interventions more preventative and less reactive improves the quality of service.**

#### Access for vulnerable and disadvantaged clients

It has been argued in some quarters that face to face services are redundant and this has been demonstrated by the success of remote services during lockdown. Neither ourselves or any of the people we have spoken to would accept this point of view.

**Face to face remains an essential delivery channel for clients who struggle with remote services for any reason** – lack of online skills, especially older people; poor quality broadband; communication issues; disability; low literacy or illiteracy – and who have complex paperwork that needs to be physically seen or completed.

These clients need accessible face to face services, in locations that they can get to easily. This implies having more rather than fewer outreaches, and developing selective CAB presences in locations that people visit. **It does not imply the closure of local branches in the name of efficiency.**

However, most CABs across the country could better use other delivery channels to free up scarce face to face resources for those who need them most, and **the lockdown has helped to develop CABs' ability and technology for delivering services by phone, email and webchat.**

#### Cost efficiency / value for money

From our interviews with Chief Officers outside East Suffolk about their experience of mergers, it has emerged that **cost savings have been hard to achieve** and have often been outweighed by additional expenditures. Points include:

- Savings on Chief Officer salaries have been offset by the need to employ Deputy Managers (e.g. Head of Operations, Head of Training / HR) to reduce CO workloads and reporting lines in larger organisations.
- There is a clear benefit in reducing the administration time and costs associated with multiple legal entities, such as financial audits, quality audits, leadership self-assessments, reporting to NCA and NCA membership fees, though this can be offset by the additional complexity of running larger organisations.
- **Mergers have provided a strategic impetus to reduce premises costs**, as well as improving relationships with councils who have in some cases provided free or subsidized accommodation.
- There may be scope to reduce other costs, for example by having more integrated IT and telephony systems. However, the costs of implementing new systems can be significant and may outweigh any savings in the short term.
- Change incurs additional costs such as redesigning websites and publicity material.

#### Income streams and funding

The funding dilemma facing charities is well known. Core funding and grants are being replaced by a proliferation of shorter-term contracts that offer no guarantee of renewal, while funding of any type is increasingly hard to source. To quote a local Councillor: **'We can't have a vital service not being able to put together long-term plans if they are forever going around with a begging bowl to SCC and others'** (<https://www.eadt.co.uk/news/east-suffolk-council-citizens-advice-funding-1-6547947>).

The case studies of BCP, WS and Sheffield CABs suggest that mergers offer some mitigation for this problem, by:

- Helping CABs to become more effective strategic partners for councils and making ongoing core funding easier to obtain.
- Providing a **single point of contact for funders to deal with**, rather than multiple points of contact.

- Enabling a larger scale of operations and range of staff expertise that provides some **continuity of project funding as a whole**, even as individual projects come and go.
- Enabling CABs to offer a more professional approach to funders and to **better demonstrate the impact of CAB services on funders' objectives**.

On the other side of the argument, **Leiston and Felixstowe are both small CABs that have been particularly successful in obtaining funding and building up strong reserves**. Their existing sources of funding, especially local funding, should not be put at risk by any future changes.

#### Impact on staff, volunteers and trustees

Change involves disruption to the established ways of doing things. Mergers and transformations require job descriptions to be rewritten and some roles to be removed while new roles are created.

Some staff and volunteers will embrace change, some will not, and some people in the latter category will move on.

The CABs that have been through mergers reported:

- Little or no formal redundancy, though some staff have moved to other positions and may have left the CAB service.
- Increased numbers of staff and volunteers compared with the situations before merger.
- Improved quality of trustees, partly due to reducing from a large pool of trustees to a smaller, selected group of trustees post-merger.
- Volunteers being attached to their local areas, more so than paid staff. They think it important to maintain the local connection for volunteers as far as possible, while accepting that some of this is inevitably lost in moving to a larger organization.

Whatever option is selected, it is important that staff and trustees can work together to implement it. We note that relationships between some staff and trustees of the existing East Suffolk CABs appear to be damaged and may need rebuilding.

#### Council needs, expectations and aspirations

This review originates in part because of SCC's declared intention to withdraw funding from the CABs unless they can demonstrate progress towards 'transformation'.

SCC will be an important partner for the CABs moving forward, so whatever can reasonably be done to accommodate their requirements will be an advantage. Whether the information requested by SCC can practically be delivered by CAB systems remains to be seen.

ESC is an essential partner for the CABs, both as funder and collaborator in supporting vulnerable clients. Relations are already good, with all three CABs working closely with ESC's Housing Needs team and having Councillors as council representatives on their Trustee Boards (as they also do for SCC).

However, there should be scope to improve co-operation further and ESC have mentioned their 'Low Income Family Tracker' system as a possible way of identifying vulnerable clients that CABs could help in future.

#### Culture and processes

**For a merger to succeed, the willingness to merge must be there**, as shown by the examples in Section 7. People from all CABs must be able to work together to develop a genuinely shared service with one coherent vision and consistent processes.

In any merger the parties will need to build a new way of working that incorporates the best and most effective culture and processes of the previous organisations.

Trust needs to be established and maintained throughout the merger and to this end the existing CABs should have an equal say in developing the new organisation, with no single existing CAB having more control than any of the others.

#### Principles and ethos of Citizens Advice

The twin aims of the Citizens Advice service are:

- 'To provide the advice people need for the problems they face'. This covers all problems, not just the ones that specific donors are prepared to fund.
- 'To improve the policies and principles that affect people's lives', which can involve criticising government policies and operational delivery of services.

The four principles that underpin the service are: a free service; confidentiality; impartiality; and independence. The last two of these need to be carefully protected, and are a key part of the CAB's appeal to clients.

Our impression from talking to merged CABs outside East Suffolk is that their increased size has improved their independence and their reliance on any one individual funder, rather than diminishing it.

However, the risk of compromising CAB principles in order to obtain funding exists for all options.

#### Riskiness of the merger process

In section 9.5 we consider the risks associated with the merger process, as informed by the experiences of CABs that have been through mergers themselves. These partly offset, but in our view do not outweigh, the potential benefits of merging.

### **8.4 Decision Matrix**

As mentioned earlier, we have utilised a qualitative and quantitative decision-making approach for this evaluation. This includes a Decision Matrix tool that displays the options as columns and maps them against evaluation criteria shown as rows.

For each of the evaluation criteria we show the contribution that each option makes. We also assign a 'weighting' number showing the relative importance that each criterion has when measured against other criteria.

Then we provide a score (1-10) of how well we estimate each option meets the criteria – this is given under the column headed 'S'.

The weighting and scoring for each option are then multiplied in the matrix - shown under column headed 'W\*S'.

Finally, the 'W\*S' column entries for each option are added from all criteria giving a ranking of options with the preferred option delivering the highest number.

The resulting Decision Matrix is given below, displaying our evaluation against the selected criteria of each option in relation to other options.

Decision Matrix			Option A			Option B			Option C			Option D			Option E		
#	Evaluation Criteria	Weighting 1-10	Do nothing / retain three separate CABs			Merger of the three East Suffolk (ES) CABs			Partnership / consortium working across separate CABs			Merger of CANES and Leiston CABs			Merger of Leiston and Felixstowe CABs		
		W	Comment	S	W*S	Comment	S	W*S	Comment	S	W*S	Comment	S	W*S	Comment	S	W*S
1	Quality of service to clients generally	8	CABs QAA scores are good. Must not be lost. Scope for enhancement is limited.	5	40	Opportunity for strategic approach for improved service to clients across ES.	8	64	CABs QAA scores are good. Must not be lost or risked. Some enhancement possible.	5	40	Opportunity for strategic approach in central and NE Suffolk. Little current collaboration.	5	40	Opportunity for strategic approach in central and SE Suffolk. Some current collaboration.	6	48
2	Access for vulnerable and disadvantaged clients	7	Each CAB is aware of the need and are seeking to address it in their area.	6	42	Potential to greatly minimise overlap/gaps to equality access in ES.	8	56	Could offer more effective joined-up CAB improvement across ES.	7	49	Potential to minimise overlap/gaps to equality of access across part of ES.	6	42	Potential to minimise overlap/gaps to equality of access across part of ES.	6	42
3	Cost efficiency / value for money	6	3 CABs are already cost efficient with current resources.	6	36	Deliver better value across ES.	7	42	3 CABs are cost efficient. Collaboration could deliver extra value.	6	36	Attract more funding for services of part ES. Better value.	6	36	Attract more funding for services of part ES. Better value.	6	36
4	Income streams and funding	8	Significant increase is limited by resources of each CAB.	5	40	Potential for resources to plan/deliver this across all ES.	8	64	Significant increase is limited by resources of each CAB.	6	48	Potential for resources to plan/deliver this across part of ES.	6	48	Potential for resources to plan/deliver this across part of ES.	6	48
5	Impact on staff and volunteers	6	No impact on staff, trustees volunteers. Limited job security.	6	36	Some loss of localism. Better career prospects and job security. 2/3 trustees reduction.	6	36	No impact on staff, trustees volunteers. Resilience may improve.	6	36	Some impact. More resilient CAB. Trustees 1/2 reduction.	6	36	Some impact. More resilient CAB. Trustees 1/2 reduction.	6	36

Decision Matrix			Option A			Option B			Option C			Option D			Option E		
#	Evaluation Criteria	Weighting 1-10	Do nothing / retain three separate CABs			Merger of the three East Suffolk (ES) CABs			Partnership / consortium working across separate CABs			Merger of CANES and Leiston CABs			Merger of Leiston and Felixstowe CABs		
		W	Comment	S	W*S	Comment	S	W*S	Comment	S	W*S	Comment	S	W*S	Comment	S	W*S
6	Council needs and expectations	7	Not match needs & aspirations of SCC or ESC.	3	21	Fully meets SCC/ESC's needs & aspirations.	8	56	Collaboration may match some needs of ESC, not SCC.	4	28	Partly meets SCC/ESC's needs in some of ES.	6	42	Partly meets SCC/ESC's needs in some of ES.	6	42
7	Culture and processes	7	3 CABs have different processes for working and reporting.	4	28	Potential for an effective CAB with a collaborative culture in ES.	9	63	3 CABs have different processes. Possible consolidation.	5	35	Potential for a CAB with a collaborative culture in part of ES.	6	42	Potential for a CAB with a collaborative culture in part of ES.	6	42
8	Principles and ethos of Citizens Advice	7	Some vulnerability to project funders' requirements.	5	35	Larger entity with more independence.	7	49	Some vulnerability to project funders' requirements.	5	35	Larger entity with more independence.	6	42	Larger entity with more independence.	6	42
9	Riskiness of merger process	7	No merger, no risk.	10	70	See risk section below.	5	35	No merger but risk of failure to collaborate significantly.	7	49	Still high risk in our view.	5	35	Already good cooperation between these CABs, lower risk.	8	56
SCORED OPTION TOTALS			348			465			356			363			392		

### Outcome of Decision Matrix Evaluation

As can be seen in the table above, the preferred option that emerges from this evaluation is Option B, namely that of a Merger of the three East Suffolk CABs.



## 8.5 The case for continuing with three separate CABs

Leiston and Felixstowe CABs have made the case – in writing to ESC – for the retention of three separate CABs in East Suffolk. Although we are recommending a merger of the three CABs, it is important that their key points are not lost and with this in mind we have set out their key points and our comments in the table below.

In summary, our view is that the points made by Felixstowe and Leiston do not invalidate the case for a merger of the three CABs, but rather tend to support it.

#	Points made by Felixstowe and Leiston CABs	Our comments
1	<i>Geographically, with the current main offices located as they are, in the north, centre and south of the district's large geographical area the Citizens Advice service is meeting the needs of clients across the whole of the district.</i>	Agreed, and this coverage across the district should continue.
2	<i>Looking at Leiston and Felixstowe in particular, given the rurality of the district covered, the need to provide outreach provision to those who may find it difficult to access one of our main offices due to disability, caring needs or transport difficulties is very important and in addition to their main offices in Leiston and Felixstowe itself, there are outreach services provided at (listed) locations</i>	Closing outreaches could be a false economy, but the district as a whole could benefit from one coherent outreach strategy which might result in different outreaches being available in different places at different times.
3	<i>Feedback we receive from clients indicates that face-2-face contact is valued by people who may have particular difficulties in accessing online or telephone services.</i>	Agreed, though face to face delivery may need to be reserved for the clients who need it most.
4	<i>We believe that a local CA organisation is responsive to local conditions and with the contacts we have with other local organisations, we are able to deliver bespoke services to the local community.</i>	Local branding and representation should continue if the CABs are merged. 'Bespoke services' would likely need to be identified and evaluated – the CAB services that support the majority of clients are standard not 'bespoke'.
5	<i>Our independence allows us to work closer with those other local organisations and both Felixstowe and Leiston host drop-in sessions for Flagship housing at their main offices – which allows people access to housing support in alternative locations to those offered by those organisations. In addition, Leiston holds a drop-in service for Home Group clients and the Home Group representative uses the Felixstowe CA location to meet with clients who they cannot meet elsewhere.</i>	These are examples of cross-CAB co-operation, which should continue in a merged organisation.
6	<i>Providing local services has led to a trusted relationship being formed with local Town Councils and town and District Councillors' who are happy to refer their constituents to the local CA office for further advice. They are aware that being local, the CA offices can be agile and adaptable – and able to react quickly to changing local conditions and changing demand.</i>	The relationship with town and parish councils has a strong local element. Our view is that the relationship with the district council and district councilors could be enhanced by the CABs 'speaking with one voice'.

#	Points made by Felixstowe and Leiston CABs	Our comments
7	<i>The work carried out at the local prisons allows access to advice services by residents of both locations – who would otherwise be disadvantaged in not being able to get quality assured independent advice elsewhere.</i>	This looks like a valuable service that should be retained and perhaps expanded?
8	<i>Working locally also allowed us to make quick decisions around the Social Prescribing contract which began earlier in the year. It was strongly suggested that we work in partnership with one of the larger Suffolk CA offices to provide Social Prescribing services within the area but by using the opportunity to liaise together closely and knowing the local area we were able to make decisions to work alongside other, more appropriate partners within the area in order to deliver a fully-rounded Social Prescribing service within the GP surgeries that we cover rather than a service which puts advice at its heart. We are confident that this was the correct decision – and one which gives the service user access to the best non-clinical support available.</i>	<p>We have not examined the different social prescribing contracts operated by Felixstowe / Leiston on the one hand and CANES on the other.</p> <p>However, one coherent approach to social prescribing across the whole district could be beneficial.</p> <p>The CANES contract enables outreaches in eight different GP surgeries. It raised income of £72,000 in 2019/20 (projected to be £132,000 for 2020/21), compared to £41,500 for the combined Felixstowe / Leiston contract.</p>
9	<i>Both Leiston and Felixstowe offices are volunteer led with only a small paid staff which in turn enables them to offer a cost-effective, value for money service on relatively small budgets and initial cost analysis suggests that savings would be relatively low should the services merge completely – assuming that service provision is to be maintained to the community that most needs it.</i>	The balance between staff and volunteers, and the responsibilities given to volunteers, needs to be looked at on its merits.
10	<i>We work closely with East Suffolk Council – concentrating particularly on preventative work where we can – by having a member of staff located within the Housing Team in Melton one day a week to help with affordability checks and work around arrears, debt, benefits etc. We recognise the importance of clients having (and maintaining) a roof over their heads and the work we do within the housing team has a proactive effect in keeping people's tenancies active. We have a continuing wish to work closely with the new East Suffolk Team to develop more opportunities and explore new initiatives which address new and existing needs. Very often, the Council's clients and our clients are one and the same.</i>	Agreed. The three CABs have staff members working closely with ESC's Housing Needs team under a joint contract.

## 8.6 The case for merging two of the three CABs

There are three possible combinations: CANES/Leiston, CANES/Felixstowe and Leiston/Felixstowe.

A CANES/Felixstowe merger, of two CABs that are 40 miles apart with Leiston in the middle, does not make a realistic or practical option.



### *CANES/Leiston merger*

A CANES/Leiston merger would have some merit. The two CABs are adjacent to each other and both have rural hinterlands with similar issues such as poor transport links, rural 'hidden' deprivation and the need to improve access to services for remote communities.

CANES has experience of merging Beccles and Bungay offices into Lowestoft to form CANES, and of operating outreaches in places like Halesworth. Leiston's area is a patchwork of small towns with populations similar to, or smaller than, CANES' existing sub-offices and outreaches.

However, this merger would leave Felixstowe as a small CAB surrounded by larger ones, under pressure to merge either with CANES/Leiston or with Ipswich CAB in future. It would also deliver fewer benefits than the full merger of all three CABs.

Also, relationships between CANES and Leiston CABs appear to be strained, which would not bode well for a future merger, namely one based on a 'merger of the willing' as recommended in section 7 of this report. The cultures and ways of working are different and there are more similarities between Felixstowe and Leiston.

### *Leiston/Felixstowe merger*

The two CABs are adjacent to each other and of similar size. If combined, they would be about as large as CANES.

Both CABs have many similarities: they are part of the old Suffolk Coastal district (CANES operates in the old Waveney district); they have strong local links (as does CANES); cultures that give significant responsibility to volunteers; and a conservative approach to spending with careful use of part time staff and high levels of reserves. They have projects and funders in common, including:

- A social prescribing contract through the Access Community Trust (CANES has a different arrangement, on a larger scale, which is budgeted to generate income of £132,000 for the current year).
- No current MAS contract (CANES has a MAS contract worth some £59,000 last year), but Felixstowe and Leiston have arranged parallel contracts for future work with MAS. Each contract is worth £45,800 pa and each CAB plans to offer a full-time Money Adviser post at the same salary (£22,835)
- They work alternate weeks to fulfil one half of the contract with ESC Housing Needs.
- They jointly operate an outreach in Woodbridge, working alternate weeks.
- They receive significant funding from the Rope Trust charity.

We feel that the two CABs would work well together in a merger process, and that some of the potential benefits of mergers set out in section 7 could be delivered.

A merger would move towards SCC's objective of 'four CABs in East Suffolk', without delivering it entirely. **We see a Felixstowe / Leiston merger as a viable, if unambitious, option.**

The reason we recommend a merger of all three CABs, rather than just Felixstowe and Leiston, is that the former option, in our view, has more potential to transform services. We see a merged Felixstowe and Leiston as offering more of the same on a larger scale, whereas if CANES comes in to the mix there is more potential (and necessity) for all parties to do things differently.

Merging Felixstowe and Leiston would not preclude a later merger with CANES, but the experience of other CABs suggests that a two-stage merger involves extended time periods, increased workloads and two upheavals instead of one.

## 9. MERGE ALL THREE CABs OPTION – ANALYSIS AND DELIVERY MODEL

### 9.1 Size and scope of the merged organization

Highlights from the information in section 5 of this report are repeated below:

Item	Three CABs combined
Income (based on 2019/20)	£785,000
Expenditure (based on 2019/20)	£721,000
Reserves (based on 31 March 2020)	£392,000
Assets	Property in central Lowestoft valued at £180,000 (2016). Will be wholly owned after final payment due in October.
Core funders	ESC, SCC (with CCGs), Rope Trust, Town and parish councils
Project funders	ESC Housing Needs, Suffolk CCGs, NCA (Help to Claim, Energy advice), MAS, BigC, Rope Trust, Integrated Better Care Fund, Lowestoft Primary Care Network
Staff numbers	32 (15.7FTEs)
Volunteer numbers	90 plus trainees
CAB offices	Lowestoft, Felixstowe, Leiston, Beccles, Bungay
Outreaches	Aldeburgh, Alderton, Framingham, Halesworth, Kessingland, Saxmundham, Wickham Market, Woodbridge
Clients (based on 2019/20)	8,188 clients
Issues (based on 2019/20)	29,152 issues (3.6 per client)

### 9.2 Key features of the service delivery model

The new merged East Suffolk CAB would develop its own delivery model, but we see the following principles and key features as being relevant.

Feature	Comment
Organisation structure	One legal entity, preferably a new one so that all CABs start on an equal footing and key roles can be made by appointment. This would entail having one board of trustees and one Chief Officer.
Branding	Local branding (For example 'Felixstowe CAB' branding) could be retained under the umbrella of the overall organization. Opportunities for positive rebranding could be considered by a working group.
Partnership working	Partnering with other VSOs to deliver joint projects.
Headquarters	Not clear whether any of the existing headquarters would be suitable or if new premises should be considered. The major population centre (Lowestoft) is at the Northern end of the district. The second population centre (Felixstowe) is at the Southern end of the district. The most central of the three head offices (Leiston) has a small population and poor transport links.
Other locations	Subject to a strategic, consistent approach to determine which locations need a physical CAB presence offering face to face client services. This may mean an increase in locations to make face to face services more accessible to those who need them. 'Locations' here covers both places (towns and villages) and the types of venues within those places (GP surgeries, hospitals, community centres, prisons etc.)
Premises	The organization will be open to sharing premises with councils and other VSOs, provided suitable premises are available at a reasonable cost.
Service delivery channels	Increased use of phone, email and webchat, based on one coherent strategy and compatible processes across the whole district, building on the expertise developed during lockdown.

Feature	Comment
Client base	Closer collaboration with ESC and perhaps SCC, leading to earlier, more preventative interventions and better access to vulnerable clients.
Funding	<p>Expanding existing relationships with funders across the whole district, for example:</p> <ul style="list-style-type: none"> <li>▪ A combined arrangement with ESC Housing Needs, given that CANES and Leiston/Felixstowe already have separate arrangements with ESC.</li> <li>▪ Dealing with the Rope Trust as one unit covering the whole of East Suffolk.</li> <li>▪ A combined approach to the Money Advice Service, perhaps based on CANES' experience of these contracts.</li> <li>▪ Considering whether the social prescribing initiatives – the Access Community Trust consortium for Leiston / Felixstowe, and the separate (and more lucrative and wider-ranging) arrangements for CANES - could be brought together for mutual advantage.</li> <li>▪ A combined approach to selected funders that are currently funding projects for only one CAB, for example the Big C charity.</li> </ul> <p>Building relationships with a wider range of new funders to increase financial resilience.</p>
Expertise	Deployment of specialists / subject matter experts across the whole East Suffolk area, wherever possible.
Use of statistics	<p>Working together to provide the information required by SCC, to demonstrate value and impacts provided by CABs across East Suffolk.</p> <p>Developing one consistent approach to recording impacts and outcomes across all offices, and using these to prove impacts and outcomes to potential funders.</p>

### 9.3 Financial implications

We are reluctant to put firm numbers on financial costs and benefits that can only be speculative. Potential financial implications include:

#### *Income*

- Greater likelihood of retaining the current funding from SCC (£123,200 for the three CABs).
- Greater likelihood of retaining the current funding from ESC (£199,600 for the three CABs).
- Potential to increase core and project funding by a coordinated, cross-district approach to funders.
- **This option increases the CABs' prospects of retaining funding worth £323,000 per annum and has potential to increase future funding from all sources.**

#### *Expenditure (rough estimates only)*

- Saving of three CO salaries (say £105,000), plus say one-third in non-salary payroll costs (total £140,000).
- Offset by the higher salary needed to attract a new CO with change experience for the larger organization (say £50,000), plus an Operations Manager for the area (say £35,000), plus non-salary payroll costs (negative £113,000).
- Greater likelihood of being able to save on premises costs by collocation with council and other VSOs - say 50% of premises costs of £84,000 - saving £42,000.
- Saving on audit and accountancy fees - currently £5,000, could reduce to say £2,500 - saving £2,500.
- Saving on NCA membership fees - currently £2,234 + £2,234 + £4,094 = £8,562 – one merged organization would cost £5,462 at current rates – saving £3,100.
- There is little evidence that purchasing costs could be reduced across the board due to economies of scale. Organisational changes tend to increase one-off costs in the short term, especially for IT, telephony and marketing / rebranding. (Savings = £0)

- Savings cannot be specified with any confidence, but the items above total net savings of £74,500 per annum.

#### *Premises rental costs*

Current rental payments are as follows:

Premises	Annual rent
CANES - Lowestoft	Nil
CANES – Beccles	£9,200 (£19,200 nominal rent less £10,000 donation)
CANES – Bungay	£4,680
Felixstowe	£12,000 (subject to renewal of current lease)
Leiston	£6,580
<b>Total</b>	<b>£32,460</b>

## 9.4 HR implications

#### *Trustees:*

- The three trustee boards combine into one.
- There is an opportunity to appoint trustees to the new board based on their specific expertise and ability to add value to the organization.
- The new trustee board should be stronger than its predecessors.

#### *Staff:*

- An upheaval for staff, with new roles and job descriptions and the likelihood that current staff will be asked to apply for new roles.
- This may prompt valued and experienced staff to look at other opportunities and potentially to leave the CAB service.
- Staff may need to be transferred meeting TUPE requirements to a new organization.
- Some senior staff would be asked to play a role in the merger process. This could contribute to their skills and development, but could also distract them in the short term from the 'day job' of supporting clients.

#### *Volunteers:*

- Change is likely to accelerate volunteer turnover in the short term.
- Other merged CABs have reported no fall off in longer term volunteer numbers.
- There may be more scope to use specialist volunteers (e.g. with legal experience) to serve a wider clientele.

## 9.5 Risks and mitigations

The table below lists key risks and how they relate to the 'merge all three CABs' option.

In our view the greatest risks are associated with the merger process itself, including potential delays and difficulties in the three CABs working together to develop a common ethos, strategy and processes.

Other significant risks include a loss of key staff and potential difficulty in managing services across a wide geographical area.

**Risk Register**

Risk description [See Scoring key after table]	Probability Score	Impact Score	Risk score (P * I)	Mitigation and comments
<i>Financial</i>				
Loss of existing local sources of income	1	3	3	Need to maintain local presence and contacts in each area
Loss or significant reduction in council support - SCC	3	3	9	Merger reduces this risk but does not eliminate it. Mitigation is to develop other sources of funding.
Loss or significant reduction in council support - ESC	1	5	5	Merger reduces this risk but does not entirely eliminate it.
Redundancy costs	1	2	2	Low risk based on other CAB merger experience.
<i>People</i>				
Loss of key staff	4	3	12	An inevitable consequence of change on this scale.
Loss of volunteers	3	2	6	Change is likely to accelerate turnover of volunteers. Mitigation includes retaining local presence in current locations.
Loss of trustees	5	1	5	Inevitable but may be positive and strengthen the Board.
<i>Services to clients</i>				
Loss of capability to provide services	1	5	5	Merger is likely to improve service delivery.
Loss of physical presence in remote locations	1	4	4	Depends on the strategy of the merged organization, but there is no appetite to reduce locations.
Disruption to services during merger process	3	2	6	Some upheaval and pressure on key staff is inevitable. Mitigation is a well planned process with clear responsibilities.
Difficulties in managing services across a large area with poor transport links	3	3	9	Mitigation: Increased use of remote working; staff who are prepared (and agree via job descriptions) to be mobile; volunteering available locally.
<i>Merger process</i>				
Failure of trustees and key managers to work effectively together to deliver merger	3	5	15	Mitigation is to involve only staff and trustees who buy in to the merger, in roles with clear responsibilities
Delays	4	4	16	Mitigation: clear project plan, resources, roles, timescales. Support from NCA?
<i>Other</i>				
Compromising CA principles	2	3	6	Financial resilience should make CABs less vulnerable to pressure from funders.

**Scoring Key**

Probability: 1 = Unlikely to occur 5 = Very likely to occur

Impact: 1 = Minimal impact 5 = High impact

## 9.6 Force Field Analysis

This analysis seeks to consider the key forces that support a major change and those that may resist it. The greatest value in using this technique is to focus attention on the most important issues at any time during a change process.

Force Field Analysis - Merger of 3 CABs													
Force strength													
Driving force	#	4	3	2	1	0	-1	-2	-3	-4	#	Restraining force	
Existing CAB COs supporting a merger of equals	3										2.5	COs preference to continue running independent CABs	
Chairs/trustees concerns about future resilience/sustainability	3.5										3	Chairs/trustees preference to remain independent	
Key staff job security/career development in a merged CAB	3.5										2.5	Key staff preferring the status quo that they know	
Volunteers desire for greater variety in a merged CAB	2										3	Volunteers preference for known existing arrangements	
Threats of cuts to core funding if CABs stay as is	4										2.5	Healthy finances and good reserve cover in 3 CABs currently	
Pressure to merge from SCC core funder	3.5										2.5	SCC funding not most critical of core funders moneywise	
Probable increased demand for CAB service post Covid-19	4										2.5	Resource limitations not managed through one CAB for ES	
A better coordinated delivery approach covering client needs	3.5										2	Natural limitations with current approach in building further	
Better maximise cooperation & working with councils	4.5										2.5	Cooperation with councils focused on each CABs area	
ESC's desire for 1 contact point + unified approach to services.	4										1.5	ESC adopting a flexible approach with 3 CABs currently	
Need to ensure local identity is retained in merged CAB	3.5										1.5	Concern about losing local identity by merging	
DRIVING TOTAL		39									26	RESTRAINING TOTAL	

**ANNEX 1: GLOSSARY**

ACRONYM	DEFINITION
AQS	A quality standard
BCP	Bournemouth, Christchurch and Poole CAB
CAB	Citizens Advice Bureau
CANES	Citizens Advice North East Suffolk
CCG	Clinical Commissioning Group
CP	Community Partnership
ESC	East Suffolk Council
FTE	Full time equivalent
HtC	Help to Claim
LSA	Leadership self-assessment
MAS	Money Advice Service
NCA	National Citizens Advice
QAA	Quality of advice assessment
QAF	Quality assurance framework
SCC	Suffolk County Council
VSO	Voluntary sector organisation
WS	West Suffolk CAB







### **ANNEX 3: ESC COMMUNITY PARTNERSHIP SLIDES: IMPACTS OF COVID-19**

#### *Population and deprivation*

- Because ES has an older population it is likely to see more CV-19 cases/deaths, particularly in Over 70's, than the Suffolk average – one statistic suggests that someone over 80 is seventy times more likely to die from Covid-19 than someone under 40.
- There is a link between increased levels of deprivation and increased numbers of cases/deaths – this means that parts of East Suffolk are likely to be impacted more than others.
- The existing challenges in the north of the District in relation to social mobility are likely to increase as both school attainment and employment for young people are impacted by CV-19.
- We are likely to see an increase in deprivation levels – some deprived communities could become even more deprived and the gap between deprived and affluent communities may grow.
- People who are already financially, clinically and/or socially vulnerable may become more so.
- As more services move on-line, the digital divide will grow and some will become more excluded.

#### *Health and wellbeing*

- Overall population health may deteriorate if fewer people continue to seek help with long term conditions – the older East Suffolk population is likely to be impacted more as older people have more co-morbidities.
- Life expectancy gaps may increase further between different parts of East Suffolk.
- People may seek escape from the ongoing restrictions on their daily lives through alcohol, cigarettes and possibly drugs with long term impacts on health.
- Through the HBNA hub/social prescribing we are seeing increased mental ill health due to isolation/loneliness, hardship and loss of employment – this will increase further (predicted an 8.1% decline, particularly in young adults, women and those with existing poor mental health). Social isolation is particularly impacting young people – despite their digital connectivity.
- The change in social interactions will, in turn, change relationships and may reduce individual and community resilience.

#### *Employment and economy*

- Higher rates of unemployment could become embedded – employment deprivation is already higher in East Suffolk than the Suffolk average at almost 10%.
- East Suffolk has a high proportion of SME's, who will be more vulnerable to the impacts of Covid-19 – sectors like hospitality are likely to be hit particularly hard.
- East Suffolk already has high numbers of people in low skill, low wage jobs who could be forced out of these jobs as businesses close and others move down into this tier of the job market.
- People may be forced to leave East Suffolk to find work – particularly young people and families - which will further increase the number of dependents compared to the working population in East Suffolk (currently at around 1:1).

#### *Housing and welfare support*

- Unemployment and financial insecurity will impact on housing security, leading to a change in the volume and type of demand for housing.
- There will be an increase in welfare support claims – we already know that Universal Credit claims increased by 69.4% between March and April 2020 – an increase of over 90% since April 2019, with lots of people claiming benefits for the first time.
- There could be more demand for support to meet basic life needs – shelter, food and fuel.

- This will lead to associated pressure on housing services, food banks, Citizens Advice, FIAS etc.
- Future lockdowns (national or local) would put additional pressure on community response services - some are starting to struggle as volunteers return to work.

*Communities and inequality*

- We are already seeing an increase in Anti-Social Behaviour (at both neighbour and community level).
- Community tensions may arise as the gap grows between the 'have's' and 'have nots' and frustrations about ongoing restrictions come to the surface.
- Anticipated increase in domestic violence and exploitative types of crime.
- Family breakdowns could increase the number of young people in care – already higher than the Suffolk average in East Suffolk.
- Public funding cuts will particularly impact on public services and VCSE organisations.
- A number of key VCSE organisations are likely to struggle to survive – particularly if they are unable to adapt their business model.

#### **ANNEX 4: ESC'S COMMUNITY PARTNERSHIPS**

At the time of our review, the eight Community Partnership areas and their key objectives (as provided by ESC) were as below.

##### ***Lowestoft and northern parishes:***

1. Improve mental health and wellbeing.
2. Tackle childhood obesity.
3. Reduce social isolation – all ages.

##### ***Carlton Colville, Kessingland, Southwold and villages:***

1. Active and sustainable transport provision, particularly rural.
2. Reduce social isolation and loneliness.
3. Facilities, activities and employment for young people.

##### ***Beccles, Bungay, Halesworth and villages:***

1. Active and sustainable transport solutions / community transport.
2. Reduce social isolation and loneliness.
3. Improve wellbeing and enable people to live healthy lives.

##### ***Aldeburgh, Leiston, Saxmundham and villages:***

1. Transport and access to services.
2. Economic regeneration / High Streets.
3. Housing that meets local needs.

##### ***Framlingham, Wickham Market and villages***

1. Developing opportunities for young people.
2. Reduce social isolation and loneliness.
3. Alternative, active and sustainable transport provision.

##### ***Melton, Woodbridge and Deben Peninsula:***

1. Active and sustainable transport provision.
2. **Village Hub – bringing services to people** [Possible role for CAB within the Village Hubs].
3. Youth Engagement, opportunities and services.

##### ***Kesgrave, Martlesham and villages:***

1. Reduce social isolation & loneliness.
2. Environmental care and sustainable transport.
3. Support people to age well/Traffic and road safety.

##### ***Felixstowe Peninsular:***

1. Community spaces and physical enhancements.
2. Social isolation and loneliness.
3. Education – aspirations, ambition and standards.





## **Citizens Advice Service Review Executive Summary (R1)**

Review Team: Harry Machin, Phil Austin  
and Richard Wood

Touchstone Renard Project Number: ESC 1305

Report date: 21<sup>st</sup> October 2020

Touchstone Renard Limited  
152-160 City Road  
London EC1V 2NX  
Tel: +44 (0) 203 954 2576

Contact Name: Phil Austin  
Email: [paustin@TouchstoneRenard.com](mailto:paustin@TouchstoneRenard.com)

## **EXECUTIVE SUMMARY**

The three East Suffolk CABs – CANES, Felixstowe and Leiston – are working well and have many strengths. They are solvent, able to deliver services to clients even during Covid-19, have capable and dedicated staff and volunteers and have good relationships with funders. As we have been asked: “The system isn’t broken, so why does it need fixing?”

One answer to that question is that both Suffolk County Council (SCC) and East Suffolk Council (ESC) have made further funding after March 2021 partly conditional upon ‘transformation’ of services. Our review is described (in the Request for Quotation (RFQ)) as a ‘transformation review’, and **we believe that a merger of all three CABs offers the best opportunity for a genuine transformation of services across East Suffolk**. We have based this opinion on three main types of analysis:

- A review of the current situation, which shows significant differences in the ways that the three CABs operate, especially between CANES and the other two CABs (see Section 5).
- Discussions with four CABs from other parts of the country that have undergone recent mergers, which show the potential that mergers offer for expanding and improving services (see Section 7).
- Scoring the different options (no merger, merger of two of the three CABs, merger of all three CABs) against a set of criteria including the ones mentioned in our RFQ. The merger of all three CABs had the highest score, by a considerable margin (see Section 8).

**The case for merger is not about cost savings or greater efficiency.** Some cost savings, for example by sharing local premises with other agencies, could be made irrespective of mergers (though mergers can provide a further impetus to reduce premises costs). Most of the cost savings on Chief Officer (CO) salaries would be offset by the likely need to offer a higher salary to the CO of a larger, merged CAB and the need for effective deputies to manage reporting lines and share leadership tasks. Relatively minor cost savings can, however, be made on governance, audits and membership fees payable to National Citizens Advice (NCA). CABs that have merged have mentioned additional costs such as new equipment, marketing and changes to office layouts.

**The case for merger is about creating better opportunities to fund and improve services.** CABs that have merged have found that their relationships with core funders (mainly councils) have improved and that new opportunities for collocation and closer cooperation have arisen. Funders value having a single point of contact for local CABs, rather than multiple ones.

Opportunities for project funding have also increased for the CABs that have merged, along with the ability to recruit more specialised skills to be deployed across a wider area. Within East Suffolk there are clear disparities between the project funding currently used by CANES on the one hand and Felixstowe/Leiston on the other, providing opportunities to spread local sources of funding more widely across the whole district. **For CABs that have merged, financial resilience has improved overall.**

CABs that have merged have all reviewed their systems and processes and (generally) have rolled out the best existing practices across the whole of their new areas. They have told us that this has improved services for clients, but there are associated risks as we indicate in Sections 7 and 9.

Other opportunities that stand out include:

- Closer links with councils, DWP and other voluntary sector organisations (VSOs) could enable greater numbers of vulnerable clients to be referred to CAB before their problems escalate out of control.
- More could be done to record outcomes for clients more fully and consistently across the three CABs, and to make use of the combined statistics to demonstrate the impact of CAB’s work to funders.
- Merging Trustee Boards enables a new merged CAB to select the most motivated trustees with the most relevant skills, from a large pool of legacy trustees.

- Better career progression for staff within the one organisation, and the potential to offer higher salaries.
- Better strategic planning for the whole district, in times that are increasingly uncertain.
- Combining the lessons learned from the lockdown, especially as regards remote delivery of services.

Concerning the last point above, **we reject the idea that face to face services can be fully replaced by remote services.** The lockdown has greatly improved CABs' capabilities, processes and technology for providing remote services, but there has clearly been an unmet need for face to face services during the lockdown, especially for more elderly and vulnerable clients. Consequently there should be no question of closing offices or reducing outreach locations on the pretext of greater 'efficiency', though there may be a case for a more strategic approach to providing a face to face CAB presence throughout the main population centres across the district.

**A merger of CABs does not have to mean a loss of local identity.** Some of the CABs that have recently merged have retained the local name ('Citizens Advice Thurrock' for example) within a legal entity that covers the wider district ('Citizens Advice South Essex'), and this would be possible for any of the three local CABs in East Suffolk.

As mentioned above, there are risks associated with a merger of the three CABs. It is important that the three CABs are able to work together to maximise the benefits and reduce delays, and a structure would need to be put in place to enable that to happen.

**A merger between Felixstowe and Leiston CABs is a lower-risk option that would still deliver benefits.**

These two CABs are quite similar in the ways that they work and in the projects that they work on, and if merged they would be more or less equal in size to CANES. Our view, based on one brief consultancy project, is that the potential rewards from a merger of all three CABs would offset the risks and potential difficulties of the merger process. However, a merger between Felixstowe and Leiston CABs would be a reasonable alternative step that would offer some transformation of services.

In parallel with our review, NCA have been carrying out a review of CABs across Suffolk, which should provide an overall context for our recommendations to be considered. NCA are also (separately) conducting some research into CAB mergers and we understand that this report should be published in November.

### Acknowledgement

We would like to thank all the people involved throughout the review process, from the three CABs concerned (including the Chief Officers, Trustees, staff and volunteers), East Suffolk Council (ESC) and all other stakeholders, who gave us their time, input and support. We also express our thanks to the four merged CABs that we interviewed regarding their experiences and lessons they have learned.

### Covering statement

This report and its contents have been prepared for ESC and the three CABs as part of the East Suffolk Citizens Advice Service Review project. Statements throughout this work are made in good faith based on the information provided by those involved in the review or otherwise made available or disclosed during the period of the project.

### UK London Office

Touchstone Renard Limited  
152-160 City Road, London EC1V 2NX  
Tel: 0203 954 2576

Email: [office@TouchstoneRenard.com](mailto:office@TouchstoneRenard.com)

Web: [www.TouchstoneRenard.com](http://www.TouchstoneRenard.com)

Incorporated in the United Kingdom on 28<sup>th</sup> December 1987. Company Registration Number: 02208452



## CABINET

Tuesday, 5 January 2021

### TEMPORARY ACCOMMODATION PROCUREMENT AND PLACEMENT STRATEGY 2021-23

#### EXECUTIVE SUMMARY

1. The report outlines the Temporary Accommodation Procurement and Placement Strategy 2021-23 to be used by the Council in connection with the provision of temporary accommodation for homeless households in the district. It considers the procurement of accommodation along with how households will be allocated properties.
2. The Strategy ensures that the Council meets its legal duties and delivers the Housing Needs Service in a transparent way that partners and service users can access.
3. The report seeks Cabinet approval for the adoption of the Temporary Accommodation Procurement and Placement Strategy 2021-2023.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All
------------------------	-----

<b>Cabinet Member:</b>	Councillor Richard Kerry Cabinet Member with responsibility for Housing
------------------------	--

<b>Supporting Officer:</b>	Fern Lincoln Housing Needs Service Manager 01502 523138 <a href="mailto:fern.lincoln@eastssuffolk.gov.uk">fern.lincoln@eastssuffolk.gov.uk</a>
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## **1 INTRODUCTION**

- 1.1 This Temporary Accommodation (TA) Procurement and Placement Strategy ensures the Council's compliance with current legislation and case law. It sets out the ways in which the Council will procure sufficient suitable units of accommodation to address existing homelessness pressures, and how it will make decisions on who is placed into which properties. This strategy also has the aim of assisting the Council to achieve its objectives laid out in the Homelessness and Rough Sleeping Strategy approved by Cabinet in 2019.
- 1.2 The strategy covers a reasonably short period of two years as the homelessness situation in the district is very dynamic, and TA demand needs to be reviewed with some regularity. A variety of factors can positively or negatively impact TA requirements including, but not limited to, the Covid 19 global pandemic which gave rise to a public health emergency, changes in Government legislation, the current economic environment, and the current housing market.

## **2 THE STRATEGY**

- 2.1 The Strategy covers two areas - how the Council makes decisions about where and when to place people in TA to ensure we meet our legal obligations and adopt good practice, and an analysis of projected demand for temporary accommodation and managing delivery in order to ensure a sufficient supply of suitable accommodation, minimising any financial risk to the Council's General Fund.
- 2.2 The strategy outlines our procurement approach, setting out the challenges facing the Council in obtaining accommodation for homeless households, as well as outlining the general principles that will be followed when procuring TA. The document also provides a current estimate of the number of properties that are needed for these purposes and an action plan for meeting these needs.
- 2.3 The data contained in the strategy provides a broad analysis of recent demand for TA, current geographic rental costs in the district, household compositions, homelessness presentations and current TA availability. Collectively they inform future procurement requirements.
- 2.4 The second part of the strategy addresses TA placements and sets out the Council's policy towards the placement of homeless households in temporary accommodation. It covers all offers of temporary accommodation made under any of the provisions of the homelessness legislation which are detailed in the document. The TA Placement section provides clear direction and advice on the approach that the Council will take, which complies fully with current legislation and guidance.
- 2.5 The strategy, like all our Housing strategies, provides an action plan towards the end of the document that is clear and enables the Housing Needs Service to be held accountable for achieving the objectives. This will be reported on annually to the Cabinet Member for Housing.
- 2.6 The strategy seeks to outline our intentions over the next two years but also be unambiguous about how relevant legislation and case law is applied in the Council's processes to give guidance to staff. It additionally provides detail and clarity on the Council's approach to temporary accommodation for agencies and service users to guide them as to what to expect and minimise any potential challenges.

## **3 HOW DOES THIS RELATE TO THE EAST SUFFOLK STRATEGIC PLAN?**

- 3.1 The Council's Strategic Plan includes Enabling Communities as one of the five themes. This considers maximising health, wellbeing, and safety in our district. Housing and homelessness clearly sit within this area and providing suitable temporary

accommodation to meet the needs of homeless households contributes towards meeting the objectives set out within this theme.

#### **4 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 4.1 There are no financial or governance implications with the adoption of the strategy. Any actions that involve a financial commitment would be subject to a further report to Cabinet.

#### **5 OTHER KEY ISSUES**

- 5.1 This report has been prepared having considered the results of an Equality Impact Assessment for which no group was identified as being disadvantaged by the Strategy. Careful procurement of PSL properties and selection of own stock temporary accommodation is something we have tried to balance to ensure we offer accessible properties when needed. We have ground floor accommodation for single household and families offering facilities such as level access shower and disabled access together with ground floor units to meet the needs of this client group. As such there has been a positive impact on our flexibility to offer accommodation and ensure we meet the needs of clients when TA is required.

#### **6 REASON FOR RECOMMENDATION**

- 6.1 The Temporary Accommodation Procurement and Placement Strategy has been developed in response to the changing requirements of case law around provision of TA. It also seeks to minimise the risk of legal challenge by setting out clearly how the Council seeks to procure a sufficient supply of suitable TA, and how it makes the most appropriate use of this supply to meet its statutory homelessness responsibilities and discharge its duties.

#### **RECOMMENDATIONS**

That the Temporary Accommodation Procurement and Placement Strategy 2021-2023 be adopted.

#### **APPENDICES**

##### **Appendix A**

Temporary Accommodation Procurement and Placement Strategy 2021-23

#### **BACKGROUND PAPERS – None**

# TEMPORARY ACCOMMODATION PROCUREMENT AND PLACEMENT STRATEGY 2021 - 2023

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# INTRODUCTION

**1.1** This is East Suffolk Council's first combined Temporary Accommodation (TA) Procurement and Placement Strategy covering the period from January 2021 to December 2023. In accordance with legislation and guidance, the Council will seek to accommodate homeless households within East Suffolk as far as is reasonably practicable and will consider the suitability of any TA offered. However, due to the limited availability of TA, it is sometimes necessary to place households outside of our district as it would not be reasonably practicable to accommodate them within it. The Council's duties under the homelessness legislation do not always require TA to be provided. Further information relating to the Council's duties under the homelessness legislation can be found at Appendix A.

This strategy complies with relevant legislation and case law, including:

- The Housing Act 1996, as amended by the Homelessness Act 2002 and the Homelessness Reduction Act 2017
- The Localism Act 2011
- Homelessness (Suitability of Accommodation) (England) orders 1996, 2003 and 2012
- Equality Act 2010
- Children Act 2004 and R (G) v London Borough of Southwark (2009)
- R (on the application of Carstens) v Basildon DC [2007]
- Kensington and Chelsea LBC, ex p Kujtim [1999]
- Nzolameso v City of Westminster (2015)

The strategy is aligned to East Suffolk Council's Homelessness and Rough Sleeping Strategy 2019-24 and reflects the increased demand for TA arising from the Homelessness Reduction Act 2017, which introduced new accommodation duties towards homeless households, notably a new 56 day 'relief duty.' The Homelessness and Rough Sleeping Strategy considers the impact on the Housing Needs Service following the change in legislation, and the impact of recent case law, and recognises the need to access a greater number of TA units in the district (and specifically in the south of the district where there is a current shortage). This TA Procurement and Placement Strategy sets out the ways in which the Council will procure sufficient suitable units of accommodation and how it will make decisions on who is placed into which units. This strategy also has the aim of assisting the Council to achieve its objectives laid out in the Homelessness and Rough Sleeping Strategy.



The strategy covers a reasonably short period of two years as the homelessness situation in the district (and indeed regionally and nationally) is very dynamic and TA demand needs to be reviewed with some regularity. A variety of factors can positively or negatively impact on TA requirements including, but not limited to, the Covid 19 global pandemic which gave rise to a public health emergency, changes in Government legislation (the significant impact of the Homelessness Reduction Act 2017 is a case in point), the current economic environment (e.g. Brexit and the potential impact on employment), and the current housing market (reduction in private sector lettings or growth in the new build market).

**This strategy covers two main areas:**

1. How the Council makes decisions about where and when to place people in temporary accommodation to ensure we meet our legal obligations and adopt good practice. This updates the 2018 Temporary Accommodation Placement Policy;
2. How the Council analyses projected demand for temporary accommodation with regard to numbers, size and location of units, and manages delivery in order to ensure a sufficient supply of suitable accommodation and minimises any financial risk to the Council's General Fund. This part of the strategy uses supporting data to enable projections of demand to be made to help inform future procurement of TA in the district that is appropriate, realistic, and affordable. Recommendations are made as a conclusion to meet the Council's overall strategic and financial objectives.



# TEMPORARY ACCOMMODATION PROCUREMENT

## 2.1 INTRODUCTION AND SCOPE

This part of the strategy sets out:

- The challenges facing the Council in procuring accommodation for homeless households, both for temporary accommodation and for private rented sector (PRS) offers to discharge the Council's homelessness duties (see below for a detailed explanation of the differences between them)
- The general principles that will be followed when procuring private accommodation for homeless households
- An estimate of the number of properties that are needed for these purposes and an action plan for meeting these needs
- A series of recommendations to help the Council meets its statutory, strategic and financial obligations

These principles will be monitored and reviewed at the end of the term of this strategy.

**Temporary Accommodation** takes the form of two types of accommodation:

- i) **Shorter-term accommodation** for use during the relief stage of homelessness and whilst a household's homelessness application is being assessed. This could be self-contained or shared accommodation, either through a private proprietor arrangement, through a Registered Provider, or within the Council's owned and managed stock.
- ii) **Longer-term accommodation** for households where the Council has accepted an ongoing accommodation duty. This accommodation is provided until a suitable offer to discharge that duty can be made.

**Longer-term accommodation** is provided through leasing arrangements we have with local landlords and Registered Providers. In addition to these forms of accommodation the Council also uses units from its retained housing stock within the Housing Revenue Account to alleviate the pressure of demand for housing on the Housing Needs Service and to support the General Fund.

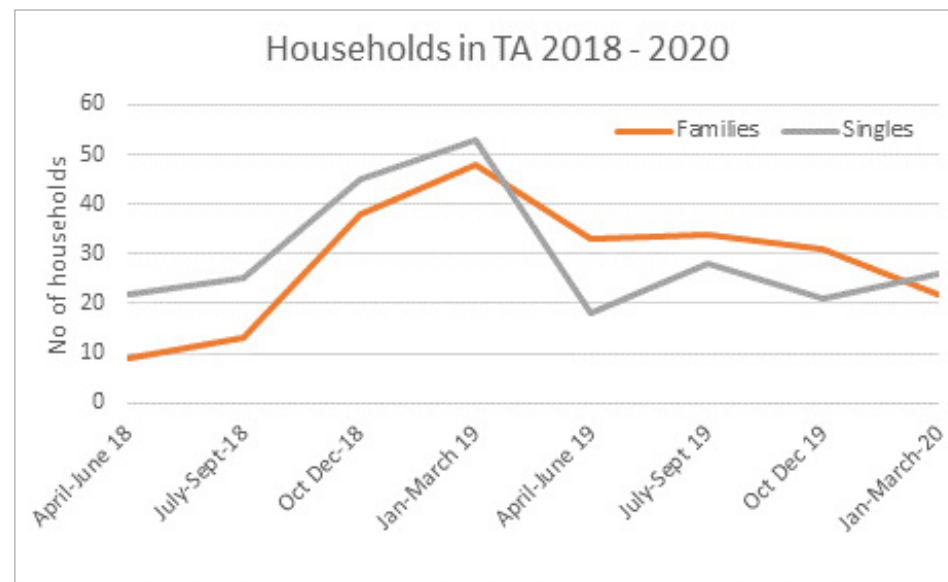
**Accommodation with shared facilities**, such as B&B with shared kitchen and/or bathroom facilities will only be used in exceptional circumstances. The Council is legally bound to offer this type of accommodation for a maximum of 6 weeks only to households with dependent children or pregnant women, and it cannot legally be offered at all to 16 and 17 year olds who present as homeless alone. The Council is also seeking to minimise its reliance on 'nightly paid' accommodation, whether this is with shared facilities or self-contained, which is usually spot purchased on the day to meet an urgent need. This is often a lower quality and higher cost option than longer-term accommodation and, as such, the Council aims to either avoid its use or move households out of this type of accommodation as soon as possible when it is used.

**Private rented sector offers ("PRSOs")** - these are offers made to homeless households where the Council has accepted an ongoing housing duty. An offer of privately rented accommodation can bring that duty to an end if it is let on a 12-month fixed term Assured Shorthold Tenancy and is suitable for the applicant. The Council needs to ensure that it can access as wide a range of accommodation as possible to meet the varying needs of homeless households and the PRS is playing an increasing role in meeting those needs.



## PROCUREMENT CHALLENGES

**3.1** The Council's TA portfolio comprises a range of provision- leasing arrangements with Registered Providers and private landlords, spot-purchased 'nightly paid' accommodation from B&Bs and other commercial businesses, and units which have been identified within the Council's own stock. As part of the Council's wider Housing Development Strategy, the portfolio of stock is regularly reviewed and appraised against needs in terms of both temporary and permanent accommodation. The Council will pursue opportunities where they are available such as acquiring housing on the open market, developing new homes, and redeveloping existing stock to meet specific needs. However, a key component in the TA Procurement and Placement Strategy is that accommodation will be sourced from the private sector. The Council operates a well-established Private Sector Leasing Scheme (PSL) which offers flexibility in terms of location and is also used when the Council needs a specific type of property which it cannot identify within its own stock.



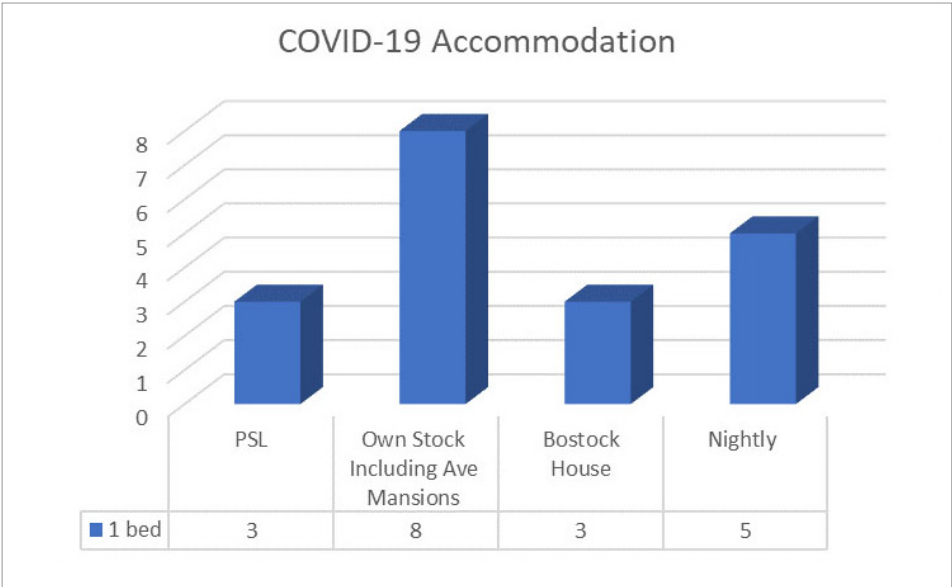
**3.2** TA demand over the last two years highlights a peak in early 2019 and a subsequent drive to address potential homelessness and reduce the numbers of households needing TA. These efforts were delivering positive results, especially for families, until the Covid pandemic arrived in March 2020.

### TA ACCOMMODATION AS AT 30 JUNE 2020 BY BEDROOM SIZE AND PROVIDER:

	One bed	Two bed	Three bed	Four bed	Five bed	TOTAL
Registered Provider	3	1	1	0	0	5
Private Sector Leasing	11	7	9	1	1	29
Own Stock	18	15	6	0	0	39
Other	11	0	0	0	0	11
<b>Total No of Units</b>	<b>43</b>	<b>23</b>	<b>16</b>	<b>1</b>	<b>1</b>	<b>84</b>



**3.3** In March 2020 the Government launched the ‘everyone in’ initiative, requiring local authorities to immediately accommodate anyone rough sleeping, or at imminent risk of rough sleeping in their districts due to the risks presented by the public health emergency. The government also mandated the closure of all night shelter style accommodation and asked Councils to move residents to alternative accommodation without shared sleeping areas. The government at this time updated the Homelessness code of guidance for local authorities requiring housing authorities to carefully consider the vulnerability of applicants from COVID-19 when making decisions about ‘priority need’ when assessing homelessness applications and making decisions about providing temporary accommodation. East Suffolk Council responded to these mandates and implemented temporary measures to mitigate the impact of the public health emergency and protect rough sleepers in the community by moving them off the streets. The Council initially housed 27 single homeless people but this rose to 38 people in total during the lockdown period.



The graph opposite shows the number of single people who remained in accommodation provided by the Council purely as a result of the Covid-19 measures on 30 June 2020. The Government has subsequently set out its expectations that Councils will continue to accommodate, and will move on into longer-term accommodation, all those placed under the Covid-19 measures. This additional pressure places a further challenge on the Council in terms of sourcing suitable accommodation. This is a particularly dynamic and fluctuating area and numbers of rough sleepers change on an almost daily basis. There is also a financial pressure on the Council with over £76,000 being spent on COVID-19 related measures by mid-July 2020 and a further £70,000 HRA expenditure anticipated on continuing to use the Hub. Other costs such as keeping properties empty for move-on accommodation also have an impact.

**3.4** All local authorities are generally finding temporary accommodation increasingly difficult to procure to meet greater demand and East Suffolk Council is finding that in the south of the district, where there are higher private sector rents, the number of landlords willing to let to households on benefits or low incomes is reducing. The situation is impacted further by COVID-19 and its impact on the housing market and personal finances.

**3.5** The table opposite shows the difference between Local Housing Allowance (LHA) rates and average advertised rents in the relevant towns and their immediate areas (April 2020). The LHA is important as this governs the maximum amount of Housing Benefit or the housing element of Universal Credit a household can claim, and so if rents are higher than this level, the property is not likely to be affordable to the tenant. In nearly every scenario the market rents exceed the LHA. The market rates quoted reflect the cheapest average rents in the town on that particular date and therefore can only be indicative. The affordability of a property will form part of the suitability assessment undertaken by the Council when making decisions about where to place households.

**3.6** Rising rents and a very competitive market locally, especially in the south of the district, is making it harder to procure new properties. Additionally, there is a need for a wide spread of temporary accommodation across the district to minimise distances that placed households may have to travel. Frequently, given the current demand for rented property, when current leases end landlords often move into the open market for which they can achieve higher rents. It is expected that the impact of the Pandemic will exacerbate this.

**3.7** The overall benefit cap for non-working households (of £20,000 for families and couples and £13,400 for single people) makes it harder for the Council to find affordable private rented accommodation for non-working households. The impact of Universal Credit (UC) has also been felt with private landlords being unwilling to take on households claiming UC without additional guarantees or incentives.

	One bed (£/pw)	Two bed (£/pw)	Three bed (£/pw)	Four bed (£/pw)
<b>Felixstowe</b>				
Market	139	156	180	250
LHA rate	112	140	164	205
<b>% higher than LHA</b>	<b>24%</b>	<b>11%</b>	<b>9%</b>	<b>21%</b>
<b>Woodbridge</b>				
Market	154	171	226	442
LHA rate	112	140	164	205
<b>% higher than LHA</b>	<b>37%</b>	<b>22%</b>	<b>38%</b>	<b>215%</b>
<b>Saxmundham</b>				
Market	92	178	199	n/a
LHA rate	112	140	164	205
<b>% higher than LHA</b>	<b>-18%</b>	<b>27%</b>	<b>21%</b>	<b>-</b>
<b>Beccles</b>				
Market	125	148	213	254
LHA rate	92	116	126	166
<b>% higher than LHA</b>	<b>36%</b>	<b>27%</b>	<b>69%</b>	<b>53%</b>
<b>Lowestoft</b>				
Market	97	124	132	246
LHA rate	92	116	126	166
<b>% higher than LHA</b>	<b>5%</b>	<b>7%</b>	<b>4%</b>	<b>48%</b>

*Home.co.uk data correct on 15.4.20*

*Table: East Suffolk locations - comparative rental rates between market and Local Housing Allowance*

## PROCUREMENT PRINCIPLES

- 4.1** The Council will follow the key principles outlined below and seek to provide accommodation within the East Suffolk district area. If there is a need to procure accommodation out of district, the Council will seek to achieve this by looking at neighbouring authorities in the first instance. Areas further afield will only be considered if it is necessary to meet a specific need or because there is nothing available closer to home on the day when it is required.

The following principles will apply when procuring properties for both temporary accommodation and private rented sector offers:

- a. The Council will act to ensure the property complies with all relevant legal obligations and have regard to all relevant legal guidance
- b. Properties should be affordable and sustainable in the longer term to the households that occupy them, including to benefit dependent households in receipt of Housing Benefit or Universal Credit, and subject to the benefit cap
- c. Each property offered to a homeless household will be suitable for that household, compliant with health and safety requirements and in a decent condition
- d. Landlords may on occasion be offered incentives in order to procure properties to prevent homelessness and to discharge our homelessness duties, and where the practice will help secure longer-term savings

## ESTIMATING AND MEETING NEED

- 5.1** Demand for temporary accommodation comes from new households approaching the Council for homelessness assistance and households who need to move from one unit of temporary accommodation to another (because they are overcrowded, for example). Homelessness demand in the longer term is difficult to predict as it is driven by a complex range of social, economic, and external factors, as well as changes to national legislation and policy. The recent increase due to the introduction of the Homelessness Reduction Act 2017 (HRA) is a case in point, together with the impact on the housing market by COVID-19 which could not have been foreseen.



**5.2** Based on data for the financial year 2019/20, it is possible to assess the impact of the HRA 2017 on demand for temporary accommodation. A comparison has been made between 2017/18 and 2019/20 of households staying in shorter-term and longer-term TA that gives an overview of the numbers involved and the average length of stay in each type of accommodation. These years have been selected as 2017/18 was the year immediately before the implementation of the new Act and 2019/20 is the most recent year offering a realistic perspective following the impact of the Act's implementation in 2018/19.

	Days in occupation	No of household placements 2017/18 (Pre HRA)	Single households	Family households	No of household placements 2019/20 (Post HRA)	Single households	Family households
Shorter Term	1<50	59	23	36	52	38	14
	51 - 100	10	3	7	24	14	10
	>100	9	3	6	9	6	3
Longer Term	1<50	10	7	3	7	4	3
	51 - 100	11	3	8	10	1	9
	>100	31	6	25	15	5	10

The placement of households shows a small overall decline in 2019/20 though with a small increase in shorter term accommodation in 2019-20. This is the result of a proactive approach to prevent and relieve homelessness following the introduction of and adaptation to the HRA 2017. The increase in single homeless households and reduction in family households in the 1 < 50 days accommodation reflects an active approach for the latter group with longer term solutions at an early stage, and a noticeable increase in presentations from single households. However, broad placements over the years show a fall in 2019/20 which give a helpful perspective on future TA demand.

### 5.3

No of Children in Household	2017/18	2019/20
0	48	90
1	47	37
2	32	10
3	9	10
4	17	3
5+	3	3

An analysis of household composition over the same two years was also undertaken of all the households that presented to the Council as homeless and to whom the Council accepted an ongoing housing duty.

There has been a significant growth in households without children presenting as homeless, and a reduction generally in larger households presenting. This will inform future provision as there has been a change in the size and type of accommodation required. The pressure to provide more smaller units of accommodation has increased again as result of the Covid 19 measures requiring Councils to accommodate many more single people than previously. It is anticipated that this additional demand will remain and increase.

**5.4** An analysis of presentations to the Council in 2018/19 and 2019/20 also helps to identify where demand is geographically located in the district, helping to inform TA procurement decisions, see table opposite.

The percentages reflect the proportion of presentations from a locality during each year. The remainder of presentations were external to our district or of no fixed abode. Future procurement needs to be mindful of the geographical spread to minimise the disruption to clients housed in temporary accommodation.

	2018/19		2019/20	
	Nos	%	Nos	%
Lowestoft Town	551	30%	543	51%
Lowestoft Outer Area	125	7%	62	6%
Beccles/Bungay/Halesworth	114	6%	78	7%
Framlingham	43	2%	35	3%
Aldeburgh	38	2%	26	2%
Felixstowe	255	14%	126	12%
Kesgrave & Martlesham	37	2%	13	1%
Woodbridge/Melton	88	5%	57	5%

**5.5**

	One bed	Two bed	Three bed	Four bed	TOTAL
Short-term					
Lowestoft	14	0	0	0	14

	One bed	Two bed	Three bed	Four bed	TOTAL
Long Term					
Lowestoft	39	8	12	1	60
Southwold	0	2	2	0	4
Beccles	3	0	0	0	3
Bungay	2	0	0	0	0
Halesworth	4	0	0	0	0
Saxmundham	1	0	0	0	0
Felixstowe	3	1	1	0	5
Woodbridge	0	1	0	0	1
<b>TOTAL</b>	<b>52</b>	<b>12</b>	<b>15</b>	<b>1</b>	<b>80</b>

In May 2020 the Council had access to a number of temporary accommodation units available in the district, see table opposite.

Short-term accommodation is primarily focussed in Lowestoft with 14 units available as well as access to nightly let accommodation that is privately owned and managed as well as a further 3 RSI rooms in Felixstowe.

Longer-term accommodation provision is spread across a wider geographical area as the table above shows, though with a very strong focus on Lowestoft. Accommodation is a mix of sizes and involves private landlords, our own housing stock and some Registered Provider owned and managed properties. Collectively there are currently 80 properties (ranging from 1 bed to 4 bed units) available with 64 in the north and only 7 in the south.



**5.6** From the data in the previous table, the following can be established to inform a future procurement requirement:

1. We have experienced a growth in single person households or households with one child that need to be accommodated in both shorter term and longer term types of accommodation.
2. There appears to be an over provision of TA in Lowestoft but a need for more in other areas, especially to the south of the district.
3. More one bed and two bed accommodation units may be required across the district (rather than the current focus on Lowestoft) and especially in Felixstowe and Beccles, but three bed accommodation could be reduced in Lowestoft.
4. The period of occupancy of shorter-term TA suggest pressures on the existing accommodation that is available. However, occupancy of long-term TA suggests that we have sufficient units to meet demand.

**5.7** Consideration also needs to be given to wider issues also:

1. The probable need to expand accommodation options for single people with complex needs to meet our responsibilities;
2. The balance between the need for short term and long term accommodation has changed because fewer units of longer term TA are needed with fewer applicants progressing to a final full duty obligation;
3. The need to increase the availability of accommodation by moving households out of TA into properties such as long-term private lets or RP and council stock;
4. Increase access to the PRS through developing an effective PRS offer.
5. With an increased demand for Stage 1 accommodation an option of exploring the procurement of more hostel accommodation through converting multiple use shared accommodation should be considered. This will provide low cost emergency accommodation and could be shared with other councils to ensure it is viable.
6. Consider the use of more social housing stock as emergency accommodation given this is a low cost option and will be especially beneficial to reduce the need to place larger families into high cost B&B or nightly let accommodation.



# TEMPORARY ACCOMMODATION PLACEMENTS

## 6.1 INTRODUCTION

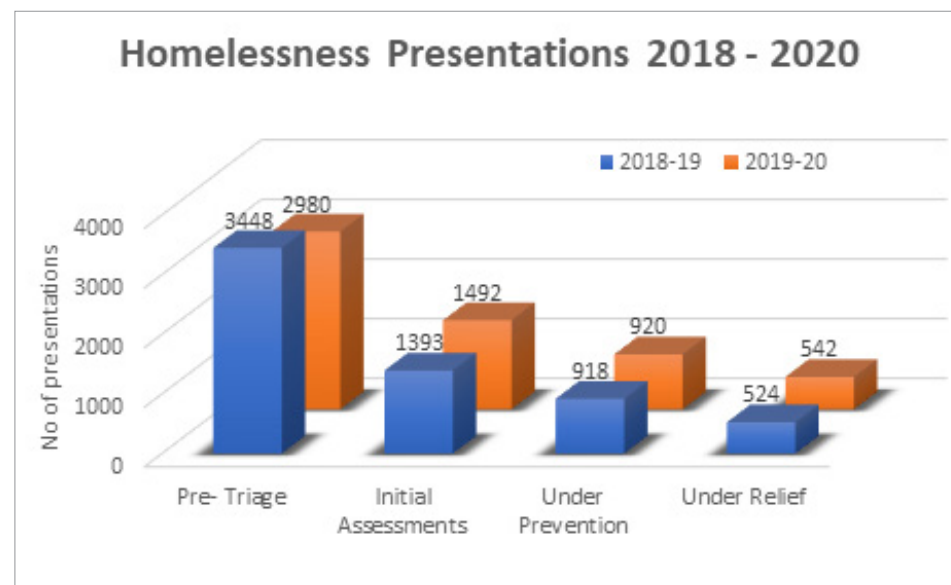
This section sets out East Suffolk Council's policy towards the placement of homeless households in temporary accommodation. It covers all offers of temporary accommodation made under any of the provisions of the homelessness legislation, which are set out in Part VII of the Housing Act 1996 (as amended) and the HRA 2017 and is guided by the Homelessness Code of Guidance 2018. This policy does not apply to final offers of accommodation to discharge the main homelessness duty made under either Part VI or part VII of the Housing Act 1996 (as amended) or the HRA 2017.

## 6.2 BACKGROUND

Local authorities have a statutory duty to provide temporary accommodation in their own area "so far as is reasonably practicable" (ref para 17.47 Code of Guidance 2018), and statutory guidance requires councils "where possible" to try and secure accommodation as close as possible to where an applicant was previously living (ref para 17.50 Code of Guidance 2018), although not being constrained by the preference of the applicant. The Council is also required to take into account the suitability of any accommodation offered (Chapter 17 Code of Guidance).

**6.3** There has been an increase in homelessness applications since the implementation of the HRA 2017 (which came into effect in April 2018). In 2017/18 the number of homeless enquiries was 2607 but subsequently rose 32% to 3448 in 2018/19. This has created pressures on providing sufficient suitable accommodation in the district to households owed an accommodation duty. The number of days in interim accommodation rose by over 100% (3,881 days to 8,095 days) over this same period, but only by 2% for days in TA (16,167days to 16,596 days).

The graph opposite shows the number of presentations of homeless or potentially homeless households over two financial years (2018/19 & 2019/20) when the legislation was complied with by the Council. Though the 'Pre-Triage' (all approaches to the Council concerning homelessness) was lower in 2019/20 than in 2018/19, the subsequent number of cases requiring a homelessness assessment and being owed a duty was slightly higher at each stage.



**6.4** The Council currently has access to the following range of options for Temporary Accommodation:

- Units within our own housing stock
- Properties leased by East Suffolk Council from private landlords through our Private Sector Leasing Scheme
- A small number of units of accommodation owned and managed by Registered Providers (RPs)
- Privately owned and managed spot-purchased ‘nightly paid’ self-contained accommodation
- Spot-purchased private B&B rooms with some shared facilities (i.e. kitchens and/or bathrooms)
- Supported and specialist housing including women’s refuges, domestic abuse satellite accommodation and hostel accommodation

**LEGAL FRAMEWORK**

Statute – We are bound by the legislative framework in the operation of the homelessness service at East Suffolk Council. Parliament amends or introduces new acts that impact on the way the Government expects homelessness to be administered.

**7.1** This policy has been developed in accordance with the relevant sections of the following legal and statutory guidance material:-

S188 HOUSING ACT 1996 (AS AMENDED)	HOMELESSNESS REDUCTION ACT 2017	S11 CHILDREN ACT 2004
S193 HOUSING ACT 1996 (AS AMENDED)	THE HOMELESSNESS (SUITABILITY OF ACCOMMODATION) (ENGLAND) ORDER 2003	HOMELESSNESS CODE OF GUIDANCE FOR LOCAL AUTHORITIES 2018
S208 HOUSING ACT 1996 (AS AMENDED)	THE HOMELESSNESS (SUITABILITY OF ACCOMMODATION) ORDER 2012	CARE ACT 2014
EQUALITY ACT 2010	LOCALISM ACT 2011	ASSOCIATED CASE LAW.



**7.2** East Suffolk Council has a duty to provide temporary accommodation for households who approach the Council as homeless and who meet the criteria as set out in Part VII of the Housing Act 1996 (as amended) and the Homelessness Reduction Act 2017. Under certain sections of the Acts, councils have a duty to provide short-term accommodation placements whilst homelessness enquires are undertaken. The legislation also sets out duties to provide longer-term temporary accommodation placements for certain households depending on their circumstances. Within this document placements under all the above provisions will be referred to as temporary accommodation placements.

Guidance – In addition to the relevant statute, a statutory Code of Guidance is issued by the Government to give greater detail on all aspects of the relevant legislation. Additional guidance notes are also issued when new Orders or other Statutory Instruments take effect to assist Councils with interpreting and understanding any new duties or changes to legislation.

**7.3** Supplementary guidance to the homelessness changes introduced by the Localism Act 2011 and the Homelessness (Suitability of Accommodation) Order 2012 (DCLG November 2012) states the following:

“Where it is not possible to secure accommodation within the district, and an authority has secured accommodation outside their district, the authority is required to take account of the distance of that accommodation from the district of the authority. Where accommodation which is otherwise suitable and affordable is available nearer to the authority’s district than the accommodation which it has secured, the accommodation which it has secured is unlikely to be suitable unless the authority has a justifiable reason or the applicant has expressed a preference.”

Case Law – In addition to the above, there are occasions when courts consider the operation of the legislation and provide revised interpretations of the law which councils must note and comply with. These can be significant and occur from time to time.

**7.4** *Nzolameso v Westminster City Council – This is the key piece of case law regarding TA procurement and placements. It sets out a range of issues that councils need to consider when allocating temporary accommodation to homeless households and makes certain requirements of councils. These include;*

- A requirement that local authorities need to explain their decisions as to the location of the properties offered.
- Each local authority should have, and keep up to date, a policy for allocating temporary accommodation to homeless households.
- The policy should reflect the authority’s statutory obligations under both the Housing Act 1996 (as amended) and the Children’s Act 2004.
- Where there is an anticipated shortfall of accommodation in the District, the policy should explain the factors to be considered when making decisions on where a household is placed.
- The Supreme Court also proposed that each local authority should have a policy for procuring sufficient units of temporary accommodation to meet anticipated demand for the coming year.

Additional case law in relation to this matter is *R (G) v Southwark LBC* [2009] UKHL26 with reference to S.20 of the Children's Act 2004. Case law supports the precedence of the Children's Act over the Housing Act for 16 and 17 year olds. All the Suffolk Councils operate a joint protocol regarding this client group that fall under the Housing Act and the Children's Act, ensuring that in the first instance any 16 or 17 year old presenting as homeless alone and not as part of a household is assessed in the initial instance by Children's services, as that is the proper primary agency for that age group. In certain circumstances, a 16 or 17 year old will go on to make a homelessness application and the relevant district or borough Council will take on responsibility for providing the young person with accommodation. However, in Suffolk this is achieved through co-operation and joint working between the County Council and the districts and boroughs, to ensure that young people do not 'fall through the gaps' and are not passed back and forth between agencies.

- 7.5** *Birmingham City Council v Ali, Moran v Manchester City Council* [2009] – In this case the court observed that 'what is regarded as suitable for discharging the interim duty may be rather different from what is regarded as suitable for discharging the more open-ended duty in section 193(2)'. This confirms the Code of Guidance's approach that accommodation which would not be considered to be suitable for a household in the long term may be suitable for that same household in the short term.

## KEY PRINCIPLES

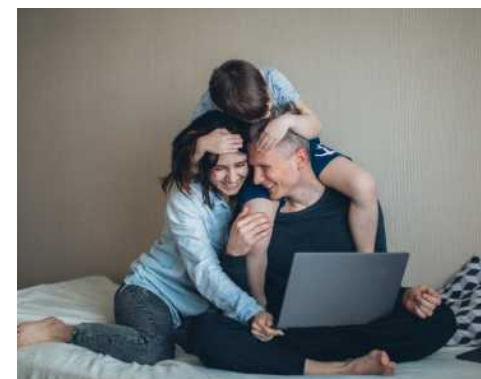
- 8.1** East Suffolk Council came into being in April 2019 via a merger of two former councils- Waveney DC and Suffolk Coastal DC.. The former had retained its own housing stock but Suffolk Coastal DC had transferred theirs 30 years earlier. This has presented ESC with a unique situation with no council housing stock in the south of the district, limiting available options to address homelessness. However, it has also presented an opportunity with the Council being able to seek to develop or acquire housing stock in the south to help alleviate the pressures around homelessness and rough sleeping. Additional challenges include a lack of supported housing, high private rented sector rents in the south which are not sustainable for households on low incomes, and high deprivation and unemployment in the north of the district.

Whilst the Council is exploiting these opportunities to deliver medium to long term accommodation options for homeless households, a pressure on short-term solutions remains. In general terms, the Council seeks to use spot-purchased B&B and nightly paid placements for the minimum period possible due to the costs attached and the lack of security and longevity for the households accommodated. As such this type of accommodation is primarily used when it is required out of normal office hours or at very short notice, and for households who have recently made an application as homeless whilst enquiries are carried out into what, if any, ongoing duty may be owed to them. The Housing Needs Service seeks to move all households placed in this type of accommodation on into longer-term accommodation as soon as possible, and uses a combination of hostels which deliver support, council owned and managed stock, PSLs and RP owned and managed accommodation for this purpose. There will be exceptions to this based on the specific needs of the applicant and the availability of accommodation.

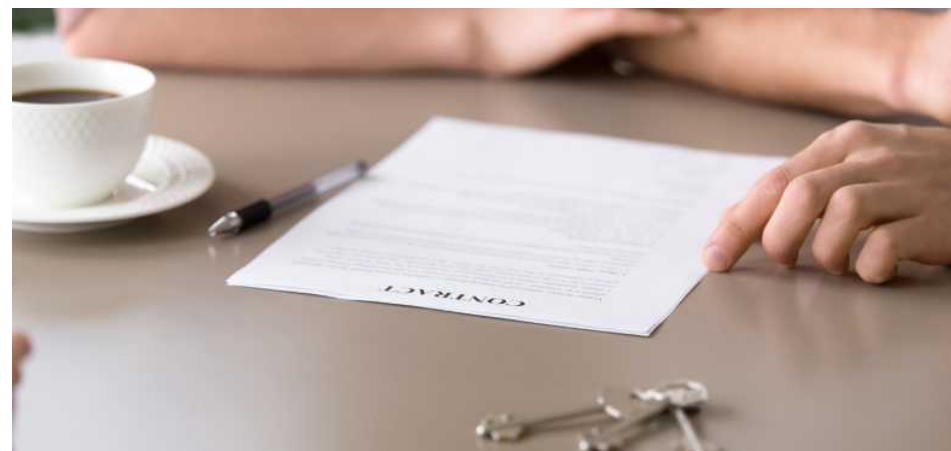


It is regrettable that we have only limited access to 'out of hours' accommodation (usually only B&B and nightly paid placements), and in certain circumstances this may lead to out of district offers being made due to lack of accommodation within district being available.

- 8.2** In accordance with legislation, case law and statutory guidance, the Council seeks to accommodate homeless households within the district area of East Suffolk as far as is reasonably practicable, and as close to where they were previously living as possible, unless the applicant's choice is to move further afield. However, as there is a shortfall of temporary accommodation to meet housing need, particularly in the south of the district, it will not always be practicable to provide accommodation to homeless households close to where they were previously living. There will be a need to use accommodation outside the district, and in the southern part of the district this may in fact be preferable to a placement in the centre or north of the district.
- 8.3** There are occasions where demand for temporary accommodation exceeds the number of available procured self-contained units, or there are other constraints in finding suitable self-contained accommodation. In these circumstances, if there is a duty to accommodate a household, the Council will, as a last resort, place a household in accommodation with shared facilities such as B&B / hotel / guest-house accommodation but in compliance with the Code of Guidance 2018 (Para 17.36) imposing a maximum of 6 weeks in such accommodation for pregnant women and households with dependent children.
- 8.4** The lead authority for 16 and 17 year olds who present as homeless is the Children's Social Care Authority in line with the Southwark judgement (R(G) v Southwark LBC in May 2009). However, if the local housing authority is exceptionally under a duty to provide a 16 and 17 year old with accommodation, any accommodation provided must be suitable. The Secretary of State considers that bed and breakfast or shared accommodation is never suitable under any circumstances for this category of applicants as set out in the statutory guidance (Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation 2018) As such, East Suffolk Council works closely with Suffolk County Council with the aim of avoiding the need for any such placements.
- 8.5** The Housing Needs Service will assess the suitability of every offer of accommodation that is made to individual homeless households, in line with legal requirements including legislation, associated case law and statutory guidance (such as the Suitability of Accommodation Order 2012). We will take account of all relevant factors when assessing the suitability of temporary accommodation regarding size, location, accessibility and facilities.



- 8.6** When assessing the suitability of location for temporary accommodation regard must be had to the Homelessness Code of Guidance 2018. This states that the Temporary Accommodation must be suitable in relation to the applicant and to all members of their household who normally reside with them, or who might reasonably be expected to reside with them. The Guidance sets out the factors that should be considered when deciding whether the accommodation is suitable or not. Households have the right of review on the suitability of accommodation if they are owed the 'full' homelessness duty. (See Appendix B – Suitability Matrix).
- 8.7** If it is not possible to provide temporary accommodation within the district, accommodation will be offered in a neighbouring housing authority area wherever possible, considering the distance of that accommodation from where the applicant was previously living. The Council will only look beyond a neighbouring housing authority area if it is not possible to provide anything suitable and/or the applicant has very specific needs which cannot be met within East Suffolk or a neighbouring housing authority area. If this should prove necessary, the Council will endeavour to provide accommodation with good transport links to the area where the applicant was previously living if essential for employment, education or support needs. Households placed outside the district may be considered for temporary accommodation within the district once a suitable unit becomes available, subject to their needs being assessed alongside the needs of other households who are owed a duty at the same time.
- 8.8** Where the Council decides that applicants placed in temporary accommodation whilst enquiries are being carried out are not owed an ongoing housing duty, they will be asked to leave and will be given reasonable notice to vacate the property to enable them to find alternative accommodation. The length of that reasonable notice period will be determined on a case by case basis, and will take account of the particular circumstances of the household.
- 8.9** Applicants will be made one offer of suitable temporary accommodation which will comply with all of the considerations set out within this policy. There is no obligation to enable applicants to view the accommodation prior to acceptance, and in most cases this will not be practically feasible, but the Council will facilitate this in exceptional circumstances where there is a special need to do so. In making the offer of accommodation, the household's individual circumstances will be considered, considering the factors set out in section 5 of this policy and our criteria on out of district placements.



## FACTORS TO BE CONSIDERED WHEN MAKING PLACEMENTS

### 9.1

EDUCATION	The ages and key educational stages of children will be taken into consideration, including any exams at Key Stage 4 (GCSE) or Key Stage 5 (A Levels or equivalent Stage 3 vocational courses such as BTECs). The practicalities of travel arrangements to existing schools or colleges will be considered including the cost and ease / length of time of travel. Support provided to any children with special educational needs will also be taken into consideration.
CHILDREN' NEEDS	In accordance with Section 11 of the Children Act 2004, the needs of all children in the household will be considered and any arrangements for safeguarding those needs. The key areas that will be considered are risks to health, safety, to enjoyment and achievement and economic well-being. Households with children at risk, on the Child Protection Register or significantly disadvantaged, will be prioritised for an offer of temporary accommodation within the district, ideally close to where they previously lived. In 'out of district' placements Suffolk County Council's Children's Services will be notified about the temporary accommodation placements.
CHILDCARE & CARING DUTIES	Where a placement is made out of district, the practicalities of maintaining existing childcare and / or other caring duties may be considered. The cost and availability of caring arrangements in the new area will also be explored, including travel time to that care provision.
EMPLOYMENT	Where the applicant or their partner is accepted as being in employment and has been working continuously for a period of six months in the district under a written contract of employment (temporary or permanent) which requires at least 16 hours work a week at a site located within the district (i.e. remote or home working is not feasible), the place of employment will be taken into consideration. Parents who are on parental leave who intend to return to work will also have their work location considered under this criterion. The ease and cost of travel to and from the location of the temporary accommodation to an existing place of work, including any shift patterns, may be considered.
RISK	Where a household is perceived to be at risk from others, or where there is a history of risk to others, the extent, nature, likelihood and gravity of the risk will be assessed and taken into account.



HEALTH & SUPPORT NEEDS	Households which contain person(s) suffering from a terminal illness or with a severe disability and are receiving regular treatment under the care of a hospital within the district, will be prioritised for an offer of temporary accommodation within the district, and where possible close to where they previously lived. Any other specialist medical or support needs will be taken into account, including any existing health or support services provided. The Council will consider whether moving the client's healthcare or support services would have a detrimental effect. Any need for accessible accommodation will be addressed.
AFFORDABLE	The Council will take into account a household's income in order to source temporary accommodation which has a rent that is affordable, as well as meeting the household's needs. Due to high rents within some parts of the district (particularly the south) this may mean securing temporary accommodation not in a household's immediate locality. The household's ability to meet any shortfall between Housing Benefit or Universal Credit paid and the rent charged will be considered. The Council will determine whether a household may be exempt from the overall benefit cap or whether they may be eligible for a Discretionary Housing Payment (DHP) to help pay the rent.
TRANSPORT	Where accommodation is sourced outside the district, the distance of the property to the district, together with services, amenities and transport links in the new area may be taken into account. The potential impact of the location on family members will be considered.
UPDATING	The Council will keep weekly records of what properties or units are available on each day and assess the best use of vacancies based on the needs of all households requiring accommodation.
MONITORING	A light-touch desktop review of this strategy will be undertaken annually, taking into account patterns of demand for and availability of temporary accommodation.

## REFUSALS

- 10.1** If an applicant rejects any offer of temporary accommodation provided under any duty, they will be asked to provide their reasons for refusal. This applies to new applicants, as well as those seeking a transfer from existing temporary accommodation, and those in temporary accommodation who are required by the Council to move. The reasons given will be considered and any and further enquiries undertaken as necessary.

If the reasons for refusal are accepted, the offer will be withdrawn and a further offer will be made if a suitable alternative unit of accommodation is available. In some circumstances there may be only one unit of accommodation available on a given day and so no alternative will be offered until something suitable becomes available.

- 10.2** Any placement made whilst enquiries are being undertaken (under s.188 of Part VII of the Housing Act 1996 (as amended)) provides no security of tenure to the applicant and the placement can be terminated with immediate effect. There is no right of appeal against the suitability of accommodation offered to applicants under this section (although they can apply for judicial review through the courts).

- 10.3** Where a household is owed the 'full' homelessness duty, which is an ongoing accommodation duty, and the household refuses a suitable offer of temporary accommodation, if the Council does not accept their reasons for refusal, applicants will not be offered further accommodation and will be required to make their own arrangements. However, applicants owed this duty may ask for a review of the decision that the accommodation offered to them is suitable.

An applicant may request a review as to suitability regardless of whether or not they accept the accommodation. This applies equally to offers of accommodation made to discharge the 'full' homelessness duty and to offers of an allocation of private or social rented accommodation that would bring that duty to an end. There are four possible scenarios if a review is requested:

1. The applicant accepts the offer and requests a review, and the review is successful. In this situation an alternative offer of accommodation will be made.
2. The applicant accepts the accommodation and requests a review, and the review is not successful. In this case no further offer of accommodation will be made but the applicant will be able to continue to occupy the accommodation.
3. The applicant refuses the offer of accommodation (i.e. they do not move into it) and requests a review, and the review is successful. In this situation a further offer of accommodation will be made.
4. The applicant refuses the offer of accommodation (i.e. they do not move into it) and requests a review, and the review is not successful. In this case, no further offer of accommodation will be made.

- 10.4** It is important to note that in either in scenario 3 and 4 above, accommodation pending the outcome of the review may or may not be provided. Each case will be assessed on its merits and in line with the principles set out in the primary case law in this area, which is *Camden vs Mohammed* ( R. v. Camden L.B.C., ex p. Mohammed. 30 H.L.R) which include the overall merits of the review request, any new information or evidence that may affect the original decision, the personal circumstances of the applicant and the potential impact of the loss of accommodation. Should the outcome of the review determine that the original offer was suitable, the homelessness duty will be discharged.

It is important to note that units of accommodation cannot be held empty for applicants pending review due to the overall demand for temporary accommodation compared to supply. As such, if an offer is refused, the unit will be offered to another household and not held over.

## ACTIONS REQUIRED TO IMPLEMENT THE POLICY

### 11.1

ACTION REF	ACTION DESCRIPTION
1	Additional TA units are required in the south and centre of the district especially 1 and 2 bedroom properties. The Council will actively seek to acquire properties in this area via the PSL scheme and acquisitions into the Housing Revenue Account. The Council will also seek to strengthen existing arrangements with Registered Providers who hold stock in this area in order to lease units or to negotiate nomination agreements with them to use properties as TA.
2	Consideration will be given to ending some of the PSL leases on 3 bedroom properties in Lowestoft as there appears to be over capacity, together with reviewing the use of accommodation that does not meet current council standards.
3	Undertake a frequent review of current usage of the Council's own housing stock as TA to ensure a balanced portfolio of PSL and council stock are used and minimise any reliance on the council's own housing.
4	Consideration to be given to the associated costs of the use of PSL and Council stock to ensure costs are properly accounted for and best value is achieved to minimise loss to the Council.
5	The Council will develop an effective PRS offer across the district to reduce the period of stay in long-term temporary accommodation.



### HOMELESSNESS REDUCTION ACT 2017

The Homelessness Reduction Act 2017, which came into force on 3rd April 2018, requires all councils to:

- (i) provide or secure the provision of a service, available free of charge to any person in the district, providing information and advice on
  - a. Preventing homelessness
  - b. Securing accommodation when homeless
  - c. The rights of persons who are homeless or threatened with homelessness, and the duties of the authority
  - d. Any help that is available from the Council or anyone else, whether under this Part or otherwise, for persons in the authority's district who are homeless or may become homeless (whether or not they are threatened with homelessness) and
  - e. How to access that help
- (ii) start assessing an applicant at risk of being made homeless 56 days before losing their home
- (iii) identify all applicants who are homeless or threatened with homelessness and are eligible for assistance and attempt to engage those applicants thereby becoming a proactive rather than reactive service
- (iv) offer every applicant who is homeless or threatened with homelessness and eligible for assistance a Personalised Housing Plan
- (v) take reasonable steps to help all applicants that are homeless and eligible for assistance to secure suitable accommodation for the applicant's occupation for at least 6 months. There is an expectation that councils will have a private sector offer and the ability to step in and assist financially.

## APPENDIX B

### SUITABILITY CHECKLIST

<b>Impacts considered</b>  <b>These start with the statutory regulations which cover the matters that must be taken into account and then look at the more common subjective matters.</b>	<b>Is there an unacceptable adverse impact? If there is an impact but the offer is still considered to be suitable show in the table below or a separate file note how the matter has been considered and the reasons reached why the offer will be suitable with regard to meeting the location regulations and any other subjective matters.</b>	<b>Where an offer has been made and an applicant wishes to refuse it based on a claim that it is not suitable due to location or subjective matters – list them here and your response to them and whether any new information will have an impact on the suitability of the offer.</b>
Significance of any disruption which would be caused by the location of the accommodation to the education of the person or members of the person's household.		
Significance of any disruption which would be caused by the location of the accommodation to the employment of the person or members of the person's household.		
Significance of any disruption which would be caused by the location of the accommodation to the caring responsibilities of the person or members of the person's household.		
The proximity and accessibility of the accommodation to medical facilities and other support which- (i) Are currently used by or provided to the person or members of the person's household; and (ii) Are essential to the well-being of the person or members of the person's household; The proximity and accessibility of the accommodation to local services, amenities and transport.		
Where the accommodation is situated outside the district of the local housing authority, the distance of the accommodation from the district of the authority;		

Other Subjective matters		
<ul style="list-style-type: none"> <li>✓ Any safety issues relating to possible harassment or domestic abuse that relate to the location of the accommodation offered.</li> <li>✓ Any medical issues which do not relate proximity and accessibility of the accommodation to medical facilities but are specific to the property to be offered e.g. no lift, stairs, physical mobility issues, and children with AHD in flatted accommodation.</li> <li>✓ The size of the accommodation offered in respect of bedroom eligibility under the Local Housing Allowance rules.</li> <li>✓ Property is too small – show it is of the right size for the household and not overcrowded.</li> <li>✓ Any physical, mental health, or addiction issues and the impact of the accommodation on any of these issues such as close to other users or addicts.</li> <li>✓ Property is on an estate/in an area that the applicant doesn't want to live and irrational fear of being harassed or claim that to move would affect depression or mental health. Consider their subjective view.</li> </ul>		
Other subjective matters found to be relevant or raised by the applicant after the offer is made.		

I can confirm that each of the above impacts has been taken into account and that I consider that there are no known circumstances that render the accommodation at ..... not to be a suitable offer of accommodation with regard to the Homelessness (Suitability of Accommodation) (England) Order 2012 – Part 1 and any other subjective matters

Signed .....

Following the formal offer of this PRSO property the applicant has refused it claiming it is not suitable stating reasons that relate to the location and or other subjective matters. I can confirm that each of the additional reasons stated by the applicant have been considered and taken into account and that I consider that there are no known circumstances that render the accommodation at ..... not to be a suitable offer of accommodation with regard to the Homelessness (Suitability of Accommodation) (England) Order 2012 – Part 1 and any other subjective matters.

Signed .....



## CABINET

Tuesday 5 January 2021

### FEES AND CHARGES FOR 2021/22

#### EXECUTIVE SUMMARY

1. Income from fees and charges is an integral part of the Medium-Term Financial Strategy (MTFS), generating essential funding for the Council to help minimise Council Tax increases and/or service reductions.
2. It is vital to ensure that our charges reflect any changes in costs or demands, that have either already occurred, or are expected to occur over the next year.
3. In addition, the financial constraints currently faced by the Council makes it essential to ensure its income from fees and charges is consistent with the East Suffolk Strategic Plan and relevant Government legislation.
4. Cabinet is asked to consider and approve the schedule of Discretionary Fees and Charges for 2021/22 as set out in **Appendix A** and to note the schedule of Statutory Charges as set out in **Appendix B**. The date for implementation of the discretionary fees is 1 April 2021, unless otherwise stated.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All wards in East Suffolk
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<b>Cabinet Member:</b>	Councillor Maurice Cook Cabinet Member with responsibility for Resources
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<b>Supporting Officers:</b>	<p>           Brian Mew            Interim Chief Finance Officer and Section 151 Officer            01394 444571  <a href="mailto:brian.mew@eastsuffolk.gov.uk">brian.mew@eastsuffolk.gov.uk</a> </p> <p>           Lorraine Rogers            Deputy Section 151 Officer            01502 523667  <a href="mailto:lorraine.rogers@eastsuffolk.gov.uk">lorraine.rogers@eastsuffolk.gov.uk</a> </p> <p>           Damilola Bastos            Finance Planning Manager            01394 444528  <a href="mailto:damilola.bastos@eastsuffolk.gov.uk">damilola.bastos@eastsuffolk.gov.uk</a> </p>
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## 1 INTRODUCTION

- 1.1 All councils provide a wide range of services to their communities, often for a fee or charge. The nature of these fees and charges generally depends on whether they relate to statutory or discretionary services. Some of these, such as those for statutory fees, are set by Government statute and are commonly known as 'regulatory fees'. In these cases, councils usually have no control over service pricing.
- 1.2 Fees and charges are a significant source of income for councils. The Local Government Act 1989 gives councils the power to set these fees and charges to offset the cost of their services. A widely accepted public sector pricing principle is that fees and charges should be set at a level that recovers the full cost of providing the service, unless there is an overriding policy or imperative in favour of subsidisation. Section 93 of the Local Government Act 2003 enables local authorities to charge as they choose to for discretionary services; provided they are not restricted by other legislation and they do not make a profit.
- 1.3 In setting fees and charges councils must apply principles of sound financial management and need to consider a range of 'Best Value' principles including service cost and quality standards, value-for-money, as well as balance the affordability and accessibility of their services.
- 1.4 Councils must also comply with the Government's Competitive Neutrality Policy for significant business activities they provide and adjust their service prices to neutralise any competitive advantages when competing with the private sector.

## 2 KEY POINTS

- 2.1 Fees and charges income is a vital source of income to the Council, in the region of £13 million per annum to the General Fund (excluding the Port Health Account).
- 2.2 The Council's policy is to review fees and charges each year. The Medium Term Financial Strategy – Key Principles, states the current policy on fees and charges:

"Increase existing fees and charges on a market forces basis whilst having regard to the Council's policies and objectives. As a minimum, fees and charges should be increased by price inflation. The Council will also review opportunities to introduce new fees as appropriate".
- 2.3 Fees and charges can be categorised into two groups:
  - discretionary fees and charges for approval by Cabinet; and
  - statutory fees and charges that have to be set in accordance with legislation and Government regulations.
- 2.4 Generally, any increase in fees and charges at East Suffolk Council will take effect from 1 April. However, if the fees and charges are set by statute these will vary per the date set by Government regulation.

### **Discretionary Fees and Charges**

- 2.5 The proposed discretionary fees and charges for 2021/22 as set out in **Appendix A**, have been set taking account of the following:

- Where only the full cost of service provision can be charged, the fee or charge reflects the full cost, including an apportionment of support service costs.
- Where the discretionary fee or charge is set at the market rate, these have been benchmarked and set at the appropriate rate taking into account demand for the service but ensuring that any competitive advantage is neutralised if in competition with the private sector.
- Review opportunities to introduce new fees as appropriate.
- Where appropriate, alignment of fees and charges from the predecessor Councils.
- Building Regulation charges are no longer published at the request of the Head of Planning and Coastal Management. This is because there is considerable competition from the private sector for the provision of this service and the publication of the Council's charges in this area would result in the Building Regulation service facing a competitive disadvantage and loss of income.
- Other discretionary fees and charges which do not fall into any of the above, are increased by the Retail Prices Index (RPI) as at June. However, for June 2020 the RPI was much lower compared to last year, 1.1% compared to 2.9%. It was therefore considered that a maximum increase of 2.9%, subject to rounding, was a reasonable basis for fee increases not within the above categories.

- 2.6 Specific reference to some sections of the discretionary fees & charges (**Appendix A**) is made in paragraphs 2.7 to 2.10 below.
- 2.7 **Parking Services (Appendix A, Section 3.1)** - The East Suffolk Council Off-Street Parking Places Order 2020 (the Order) was sealed by the Council on 20 August 2020 and came into force on 21 August 2020. Therefore, no further review is proposed to the parking fees at this time.
- 2.8 **Beach Huts & Chalets (Appendix A, Section 3.8)** – A 2.75% increase has been agreed with the Beach Huts Association. The exception is Cliff House Chalets (6-17) showing a proposed increase of 19.38%, (£222.28). These Chalets were former Band C due to historical reasons with no electricity which has now changed. These will be increased over three years to bring into line with Band B, rather than a one off increase.
- 2.9 **Cemeteries (Appendix A, Section 3.10)** – Proposed charges for Interment and Exclusive Right of Burial are proposing an increase of £100 to £200 for cemeteries in the north of the district. This is to commence alignment of these charges relating to the predecessor Councils.
- 2.10 **Pre-Application Planning Advice (Appendix A, Section 6.2)** - These fees are currently being reviewed and will be considered by the January 2021 Strategic Planning Committee.

### **Statutory Fees and Charges**

- 2.11 The statutory fees for noting are set out in **Appendix B**. Where a due date for updating statutory fees is in place, this information is provided in the relevant section of the appendix. The schedule of fees and charges on the Council's website will be updated when this information is made available. For some statutory fees there are no set review dates. For example, planning application fees (Appendix B, Section 3.5) are set by



Government under the Town and Country Planning Regulations 2012 and were last increased in January 2018.

### **3 HOW DOES THIS RELATE TO THE EAST SUFFOLK STRATEGIC PLAN?**

- 3.1 By ensuring cost recovery and introducing new fees and charges where possible, the Council is taking opportunities to generated and collect income to boost the Council's financial sustainability, a priority under the strategic theme of Remaining Financially Sustainable.

### **4 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 4.1 Income from fees and charges is an integral part of the MTFs, generating essential funding for the Council to help minimise Council Tax increases and/or service reductions.
- 4.2 The Council must set fees and charges within the governing legal framework. Some fees and charges are subject to legislation, for example income being limited to cost recovery, or are set by the Government on a national basis.

### **5 OTHER KEY ISSUES**

- 5.1 The Council can use fees and charges as a mechanism to contribute to the delivery of the East Suffolk Strategic objectives of Enabling our Communities and promoting Economic Growth, by encouraging healthier lifestyles through the use of sports and leisure facilities or providing marketing opportunities to promote tourism to the benefit of the local economy.
- 5.2 Where applicable Equality Impact Assessments have been prepared by the service area when considering a proposal for setting a revised/new fee or charge for 2021/22.

### **6 CONSULTATION**

- 6.1 The fee and charges proposals for 2021/22 have been made by service areas and Heads of Service.

### **7 OTHER OPTIONS CONSIDERED**

- 7.1 The policy option of not reviewing fees and charges for 2021/22 was rejected to meet the East Suffolk strategic objectives, the principles of the MTFs, and the Council's policy on fees and charges.

### **8 REASON FOR RECOMMENDATION**

- 8.1 To set the Council's discretionary fees and charges from 1 April 2021.

#### **RECOMMENDATIONS**

1. That the discretionary fees and charges set out in **Appendix A** be approved for implementation from 1 April 2021.
2. That the fees and charges set by statute and the timing of any increase in these as set out in **Appendix B** be noted.

<b>APPENDICES</b>	
<b>Appendix A</b>	Schedule of Discretionary Fees and Charges from 1 April 2021
<b>Appendix B</b>	Schedule of Statutory Fees and Charges from 1 April 2021

<b>BACKGROUND PAPERS</b>		
<p>Please note that copies of background papers have not been published on the Council's website <a href="http://www.eastsuffolk.gov.uk">www.eastsuffolk.gov.uk</a> but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.</p>		
<b>Date</b>	<b>Type</b>	<b>Available From</b>
Various dates	Equality Impact Assessments	Service Teams
Various dates	Working papers	Finance Team / Service Teams

# Discretionary Fees and Charges

2021/22

East Suffolk Council



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## FEES AND CHARGES NOTE

### **Note**

Generally any increase in fees and charges will take effect from 1 April 2021 and apply through to 31 March 2022. Details of variations from this date, for example, where committee are due to approve fees at a later date, are included in the schedule.

The prices quoted in this book are inclusive of Value Added Tax (VAT) when applicable, therefore individuals and companies do not need to add VAT to the price shown. Please refer to the VAT code key below for further details.

### **VAT Code Key**

The current standard rate of VAT is 20%.

This schedule for fees and charges show the rate of VAT applicable which is denoted by one of the following abbreviations;

S	Standard Rated
EX	Exempt
OS	Outside Scope
ZE	Zero Rated

### **Photocopying**

Photocopying charges for East Suffolk Council will include an initial charge of £10.00 with an additional charge of 50p per A4 sheet.

## ENVIRONMENTAL & PORT HEALTH

### 1.1 Charges for licences

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Animal welfare</b>					
Pet shops **	£294.00	OS	£285.00	9.00	3.16%
Dog breeding establishments **	£294.00	OS	£285.00	9.00	3.16%
Dangerous wild animals **	£438.00	OS	£438.00	0.00	0.00%
Animal boarding establishments **	£294.00	OS	£285.00	9.00	3.16%
Riding establishments **	£294.00	OS	£285.00	9.00	3.16%
Additional fee for each additional activity *	£65.00	OS	£63.00	2.00	3.17%
Re-rating request *	£150.00	OS	£145.00	5.00	3.45%
Appeal inspection fee *	£150.00	OS	£145.00	5.00	3.45%
<b>Variation Application Fee-</b>					
1 star	£134.00	OS	£130.00	4.00	3.08%
2 star	£67.00	OS	£65.00	2.00	3.08%
3 star	£45.00	OS	£43.00	2.00	4.65%
4 star	£34.00	OS	£33.00	1.00	3.03%
5 star	£27.00	OS	£26.00	1.00	3.85%
Paperwork only variation (all ratings)*	£27.00	OS	£26.00	1.00	3.85%
<i>All the above fees marked with an asterisk (*) plus vet fees at cost, if required</i>					
<i>All the above fees marked with a double asterisk (**) an application fee of £160.00 must be paid when the application is submitted. The balance is payable when the licence is ready to be issued.</i>					
<b>Advice regarding various licences</b>					
Hourly rate	£69.00	S	£67.00	2.00	2.99%

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Zoo licensing</b>					
Notice of intention to apply for a zoo licence	£129.00	OS	£125.00	4.00	3.20%
Application for the grant of a new zoo licence for four years	£451.00	OS	£438.00	13.00	2.97%
Special inspection of licenced zoo	£160.00	OS	£155.00	5.00	3.23%
Periodic inspections (renewal & every three years)	£660.00	OS	£641.00	19.00	2.96%
<b>Vet inspection fees are in addition to all animal welfare licences</b>					

## ENVIRONMENTAL & PORT HEALTH

### 1.2 Charges for registration

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Skin piercing</b>					
Acupuncture, Tattooing, Ear Piercing, Electrolysis (Premises)	£265.00	OS	£253.00	12.00	4.74%
Acupuncture, Tattooing, Ear Piercing, Electrolysis (Persons)	£155.00	OS	£150.00	5.00	3.33%

### 1.3 Food premises register

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Copy of food premises register	£145.00	OS	£140.00	5.00	3.57%
Copy of food premises register - single entry	£19.00	OS	£18.00	1.00	5.56%

### 1.4 Certificates & health charges

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Issuing of export health certificate - Local Authority	£120.00	OS	£114.00	6.00	5.26%
Issuing of export health certificate - APHA	£230.00	OS	£222.00	8.00	3.60%
Issuing of export certificate of conformity	£91.00	OS	£88.00	3.00	3.41%



## ENVIRONMENTAL & PORT HEALTH

### 1.5 Health education courses

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Level 2 Award in Food Safety and Catering	£75.00	EX	£72.00	3.00	4.17%
Level 2 Award in Food Safety and Catering (refresher)	£44.00	EX	£42.30	1.70	4.02%
Level 2 Award in Health and Safety at Work	£75.00	EX	£72.00	3.00	4.17%
Examination re-sit fee for a Level 2 course	£44.00	EX	£42.30	1.70	4.02%

### 1.6 Voluntary surrender certificates

	2020/21	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Issue of voluntary surrender certificates	£180.00	OS	£175.00	5.00	2.86%
Disposal of food	<i>Actual Cost (net of VAT)</i>		<i>Actual Cost</i>		

### 1.7 Food hygiene ratings

	2020/21	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Revisit	£155.00	OS	£130.00	25.00	19.23%

## ENVIRONMENTAL & PORT HEALTH

### 1.8 Safer Food, Better Business (SFBB)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
SFBB for caterers	£20.00	ZE	£19.00	1.00	5.26%
SFBB for caterers with residential care homes supplement	£20.00	ZE	£19.00	1.00	5.26%
SFBB for retailers	£20.00	ZE	£19.00	1.00	5.26%
SFBB Indian, Pakistani, Bangladeshi and Sri Lankan cuisines	£20.00	ZE	£19.00	1.00	5.26%
SFBB Chinese cuisine - English language version	£20.00	ZE	£19.00	1.00	5.26%
SFBB Chinese cuisine - Cantonese language version	£20.00	ZE	£19.00	1.00	5.26%
SFBB childminders	£12.50	S	£12.00	0.50	4.17%
12 month diary pack	£5.20	S	£5.00	0.20	4.00%

### 1.9 Dog control

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Costs of reclaiming a stray dog	£123.00	OS	£158.00	(35.00)	(22.15)%
Surcharge for dogs with no/unregistered/out-of-date/otherwise invalid microchip	£40.00	OS	*NEW*		
Plus administration costs	£37.00	OS	£35.00	2.00	5.71%
Plus daily kennelling fees	£15.00	OS	£14.00	1.00	7.14%
<b>Plus vet fees</b>	<b>Actual Cost (net of VAT)</b>		<b>Actual Cost</b>		

### 1.10 Provision of supplementary environmental information

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Simple requests (taking up to 2 hours to process):</b>					
This is at the Council's discretion, having regard to relevant factors (in accordance with ICO guidance) this fee may be waived for very simple enquiries	£106.00	OS	£103.00	3.00	2.91%
<b>Complex requests (i.e. taking more than 2 hours to process):</b>					
Flat Rate	£106.00	OS	£103.00	3.00	2.91%
Plus charge per hour	£69.00	OS	£67.00	2.00	2.99%

## LEGAL & DEMOCRATIC SERVICES

### 2.1 Charges for licences

				£	%
	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
<b>Sex Establishments</b>					
Sex Establishments - Initial Grant	£2,118.00	OS	£2,058.00	60.00	2.92%
Sex Establishments - Annual Fee	£1,800.00	OS	£1,750.00	50.00	2.86%
<b>Street Trading</b>					
Consents and Licences	£394.00	OS	£383.00	11.00	2.87%
Daily Fee	£26.00	OS	£25.00	1.00	4.00%
Pavement Licences (for local businesses)	£0.00	OS	*NEW*	0.00	0.00%

Single Event Street Trading Licence for events supported by Town/Parish Councils' are free of charge. This is at the Councils' discretion.

				£	%
	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
<b>Boat and Boatman Licences</b>					
Pleasure Boat Licence (up to 12 passengers)	£129.00	OS	£125.00	4.00	3.20%
Rowing Boat (4 passengers)	£64.00	OS	£62.00	2.00	3.23%

### 2.2 Hackney carriages / Private hire vehicles

				£	%
	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
Horse drawn vehicle or private hire vehicle	£47.00	OS	£45.00	2.00	4.44%
Disclosure & Barring Checks / Set by Disclosure & Barring Service	£40.00	OS	£40.00	0.00	0.00%
Vehicle ID plate initial charge (with bracket)	£28.00	OS	£28.00	0.00	0.00%
Vehicle ID plate renewal charges	£16.00	OS	£16.00	0.00	0.00%
Temporary vehicle	£47.00	OS	£45.00	2.00	4.44%
Vehicle transfer to new owner	£47.00	OS	£45.00	2.00	4.44%

## LEGAL & DEMOCRATIC SERVICES

### 2.2 Hackney carriages / Private hire vehicles (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Motorised Hackney Carriage	£316.00	OS	£307.00	9.00	2.93%
Discount for vehicles with mobility seat provision for people with disability	£159.00	OS	£154.00	5.00	3.25%
Private hire vehicles	£274.00	OS	£266.00	8.00	3.01%
Discount for vehicles with mobility seat provision for people with disability	£137.00	OS	£133.00	4.00	3.01%
<b>Driver's Licences</b>					
Initial application test	£47.00	OS	£45.00	2.00	4.44%
First application	£160.00	OS	£155.00	5.00	3.23%
Three year licence	£209.00	OS	£203.00	6.00	2.96%
<b>Private Hire Operations Licences</b>					
Knowledge Test	£53.00	OS	£51.00	2.00	3.92%
Five year licence owner/driver	£247.00	OS	£240.00	7.00	2.92%
Five year licence 2 - 5 cars	£417.00	OS	£405.00	12.00	2.96%
Five year licence over 5 cars	£822.00	OS	£798.00	24.00	3.01%

Additional Hackney / Private Hire Vehicle fees are set by East Suffolk Council's partners. The below charges are set by Norse Group Limited.

#### The Charges

Mechanical Inspection	Single Axle Trailer - Inspection
Retest	Failure to Keep Vehicle Inspection Appointment
Unfit Vehicle Notice	Taxi / Private Hire Vehicle Plate Replacement
Double Axle Trailer - Inspection	

Please contact (01502) 527100 or (01394) 444000 for more information.

## LEGAL & DEMOCRATIC SERVICES

### 2.3 Premises licences (Gambling Act 2005)

	2021/22				
	Premises Licence Fee (New App.)	Premises Licence Fee (Annual Fee)	Misc. Fees (App. to Vary)	Misc. Fees (App. to Transfer)	VAT Status
Bingo Club	£1,589.00	£752.00	£1,059.00	£1,007.00	OS
Betting Premise (excluding tracks)	£1,589.00	£600.00	£1,059.00	£1,007.00	OS
Tracks	£1,589.00	£636.00	£1,059.00	£950.00	OS
Family Entertainment Centre	£1,589.00	£636.00	£1,000.00	£950.00	OS
Adult Gaming Centre	£1,589.00	£636.00	£1,000.00	£1,007.00	OS

	2020/21			
	Premises Licence Fee (New App.)	Premises Licence Fee (Annual Fee)	Misc. Fees (App. to Vary)	Misc. Fees (App. to Transfer)
Bingo Club	£1,544.00	£750.00	£1,029.00	£978.00
Betting Premise (excluding tracks)	£1,544.00	£600.00	£1,029.00	£978.00
Tracks	£1,544.00	£618.00	£1,029.00	£950.00
Family Entertainment Centre	£1,544.00	£618.00	£1,000.00	£950.00
Adult Gaming Centre	£1,544.00	£618.00	£1,000.00	£978.00

	£ and % Increase or (Decrease)							
	Premises Licence Fee (New App.)		Premises Licence Fee (Annual Fee)		Misc. Fees (App. to Vary)		Misc. Fees (App. to Transfer)	
	%	£	%	£	%	£	%	£
	Increase or (Decrease)	Increase or (Decrease)	Increase or (Decrease)	Increase or (Decrease)	Increase or (Decrease)	Increase or (Decrease)	Increase or (Decrease)	Increase or (Decrease)
Bingo Club	2.91%	45.00	0.27%	2.00	2.92%	30.00	2.97%	29.00
Betting Premise (excluding tracks)	2.91%	45.00	0.00%	0.00	2.92%	30.00	2.97%	29.00
Tracks	2.91%	45.00	2.91%	18.00	2.92%	30.00	0.00%	0.00
Family Entertainment Centre	2.91%	45.00	2.91%	18.00	0.00%	0.00	0.00%	0.00
Adult Gaming Centre	2.91%	45.00	2.91%	18.00	0.00%	0.00	2.97%	29.00

## OPERATIONS

### 3.1 Parking services (Off-street parking places)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
<b>ALDEBURGH</b>				
Fort Green	£1.50	£3.00	£4.00	£65.00
King Street*	£1.50	£3.00	-	-
Oakley Square*	£1.50	£3.00	-	-
Slaughden	£1.50	£3.00	£4.00	£65.00
Slaughden Sea Wall	No Charge			-
Thorpeness Beach*	£1.00	£2.00	£4.00	£65.00
Thorpe Road	£1.50	£3.00	£4.00	£65.00
<b>BECCLES</b>				
Blyburgate*	£1.00	£2.00	£4.00	£65.00
Hungate*	£1.00	£2.00	-	£65.00
Killbrack	No Charge			-
Newgate*	£1.00	£2.00	-	£65.00
<b>BUNGAY</b>				
Boyscott Lane	No Charge			-
Nethergate	£1.00	£2.00	£4.00	£65.00
Priory Lane*	£1.00	£2.00	£4.00	£65.00
Scales Street	£1.00	£2.00	£4.00	£65.00
Wharton Street*	£1.00	£2.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
<b>FELIXSTOWE</b>				
Arwela Road	£1.50	£3.00	£4.00	£65.00
Beach Station	£1.50	£3.00	£4.00	£65.00
Brackenbury Fort*	£1.50	£3.00	£4.00	£65.00
Clifflands*	£1.50	£3.00	£4.00	£65.00
Convalescent Hill*	£1.50	£3.00	£4.00	£65.00
Crescent Road*	£1.50	£3.00	-	-
Felixstowe Pier*	£1.50	£3.00	-	-
Garrison Lane	£1.50	£3.00	£4.00	£65.00
Golf Road	£1.50	£3.00	£4.00	£65.00
Highfield Road*	£1.50	£3.00	-	-
Landguard *	£1.50	£3.00	£4.00	£65.00
Manor Terrace*	£1.50	£3.00	£4.00	£65.00
Martello Park North	£1.50	£3.00	£4.00	£65.00
Martello Park South	£1.50	£3.00	£4.00	£65.00
Nacton Shore	No charge			-
Ranelagh Road	£1.50	£3.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
<b>FELIXSTOWE</b>				
Searson's Farm	No Charge			-
Spa Pavilion	£1.50	£3.00	-	-
The Grove	No Charge			-
The Promenade	£1.50	£3.00	£4.00	£65.00
Undercliff	£1.50	£3.00	-	-
<b>FRAMLINGHAM</b>				
Fore Street*	£1.00	£2.00	£4.00	£65.00
Market Hill*	£1.00	-	-	-
The Elms*	£1.00	£2.00	£4.00	£65.00
<b>HALESWORTH</b>				
Angel Lane North*	£1.00	£2.00	£4.00	£65.00
Angel Lane South*	£1.00	£2.00	£4.00	£65.00
Bridge Street*	£1.00	£2.00	£4.00	£65.00
Station Road*	£1.00	£2.00	£4.00	£65.00
Thoroughfare*	£1.00	£2.00	-	-

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## OPERATIONS

### 3.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
KIRKLEY				
All Saints	No Charge			-
Clifton Road*	£1.00	£2.00	£4.00	£65.00
Pakefield Cliff	No charge			-
Pakefield Road*	£1.00	£2.00	£4.00	£65.00
Pakefield Street*	£1.00	£2.00	£4.00	£65.00
LEISTON				
High Street*	£1.00	£2.00	£4.00	£65.00
Main Street	No Charge			-
Sizewell Beach*	£1.00	£2.00	£4.00	£65.00
Sizewell Road*	£1.00	£2.00	£4.00	£65.00
Valley Road	No charge			-
LOWESTOFT				
Adrian Road	£1.50	£3.00	£4.00	£65.00
Alexandra Road	£1.50	£3.00	£4.00	£65.00
Battery Green*	£1.50	£3.00	-	-
Belvedere Road	£1.50	£3.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
LOWESTOFT				
Britten Centre*	£1.50	£3.00	£4.00	£65.00
Christ Church	No Charge			-
Clapham Road*	£1.50	£3.00	-	-
Claremont Pier	£1.50	£3.00	£4.00	-
Kirkley Cliff*	£1.50	£3.00	£4.00	£65.00
Regent Road	£1.50	£3.00	£4.00	£65.00
Royal Green*	£1.50	£3.00	£4.00	£65.00
St Peters Street*	£1.50	£3.00	-	-
Tennyson Road*	£1.50	£3.00	£4.00	£65.00
Waveney Sports Centre	No charge			-
Whapload Road	£1.50	£3.00	£4.00	£65.00
MELTON				
Melton Riverside	No Charge			-
Melton Street	No Charge			-
OULTON BROAD				
Nicholas Everitts Park*	£1.00	£2.00	£4.00	£65.00
The Boulevard	£1.00	£2.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
<b>SAXMUNDHAM</b>				
Market Place*	£1.00	£2.00	£4.00	£65.00
<b>SOUTHWOLD</b>				
Ferry Road (North)	No Charge			-
Ferry Road*	£1.50	£3.00	£4.00	£65.00
Harbour Quay East*	£1.50	£3.00	£4.00	£65.00
Harbour West	No Charge			-
Southwold Pier*	£1.50	£3.00	£4.00	£65.00
<b>WICKHAM MARKET</b>				
Chapel Lane*	£1.00	-	-	-
The Hill*	£1.00	£2.00	-	-
The Percy Mason*	£1.00	£2.00	£4.00	£65.00
<b>WOODBIDGE</b>				
Bawdsey Quay Picnic Site	No Charge			-
Deben	£1.00	£2.00	£4.00	£65.00
Hamblin Road*	£1.00	£2.00	-	-

## OPERATIONS

### 3.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets
VAT Status	S	S	S	S
	2 hours	4 hours	4+ hours	1 month
WOODBIDGE				
Iken Picnic Site	No Charge			-
Lime Kiln Quay	£1.00	£2.00	£4.00	£65.00
Oak Lane*	£1.00	£2.00	-	-
Sutton Heath	No Charge			-
The Station*	£1.00	£2.00	£4.00	£65.00
Theatre Street	£1.00	£2.00	£4.00	£65.00
Upper Hollesley Common	No Charge			-
WRENTHAM				
Wrentham	No Charge			-

All above locations marked with an asterisk (\*) have 30 minutes convenience concession (FOC).

All above locations with a £65 monthly ticket option also have an annual ticket option priced at £650.

#### Penalty Charge Notices (PCNs)

UK Statutory Instrument 2007 No. 3487 - The Civil Enforcement of Parking Contraventions (Guidelines on Levels of Charges) (England) Order 2007, Schedule to Article 2, Table 1, Band 2. Higher level penalty charge = £70 and lower level penalty charge = £50, discounted by 50% if paid within 14 days.

<http://www.legislation.gov.uk/ukSI/2007/3487/schedule/made>

## OPERATIONS

### 3.2 Parking services (Resident off-street parking)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Resident Off Street Parking</b>					
One year	£30.00	S	£30.00	0.00	0.00%

### 3.3 Parking services (administration charges)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Administration Charges</b>					
Season Tickets - Issue	£25.00	OS	£25.00	0.00	0.00%
Permits - Issue	£25.00	OS	£25.00	0.00	0.00%
Replacement Season Ticket / Permit	£25.00	OS	£25.00	0.00	0.00%

### 3.4 Collection of household waste

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Bulky Household Waste</b>					
For the collection of up to three single items of bulky household waste	£47.00	OS	£45.50	1.50	3.30%
Each additional item (above three items) of bulky household waste	£16.00	OS	£15.50	0.50	3.23%
Other/special collections (by quotation)	POA	OS	POA	-	-
				£	%
<b>Garden Waste Collection (fortnightly)</b>					
Garden Waste Service (per subscr	£45.00	OS	£43.50	1.50	3.45%
Green bin delivery (required for new GW subscription)	£11.00	OS	£10.50	0.50	4.76%
Supply of waste bin (single residual or recycling) - if permitted	£34.50	OS	£33.50	1.00	2.99%
Supply of additional household waste bin (single residual or recycling) - if permitted	£34.50	OS	£33.50	1.00	2.99%
Developer bin delivery charge, if more than 6 bins - residual and recycling	£15.50	OS	£15.00	0.50	3.33%

## OPERATIONS

### 3.5 Caravan & camping sites

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Southwold Harbour Site</b>					
Static Caravan - Site Fee (March - November)	£2,410.00	S	£2,325.00	85.00	3.66%
Static Caravan - Site Fee (December - February)	£210.00	S	£200.00	10.00	5.00%
New Caravan - Plot Fee	£1,875.00	S	£1,800.00	75.00	4.17%
Additional charge for electricity site	£550.00	S	£550.00	0.00	0.00%

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Additional Charges - Static Caravan</b>					
Harbour side Supplement Front Line	£203.00	S	£197.00	6.00	3.05%
Blackshore Supplement Front Line	£177.00	S	£171.00	6.00	3.51%
External Van Cleaning	£80.00	S	£70.00	10.00	14.29%
External Window & Door Clean	£15.00	S	£12.00	3.00	25.00%
Under Van Edge Trim & Weed killer Spray	£25.00	S	£22.00	3.00	13.64%

## OPERATIONS

### 3.5 Caravan & camping sites (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b><i>All below fees are charged on a per night basis</i></b>					
Tourers/Motorised Vans/Tents (Low Season) Inc 2 Adults	£27.25	S	£26.00	1.25	4.81%
Tourers/Motorised Vans/Tents (Peak Season) Inc 2 Adults	£32.50	S	£31.25	1.25	4.00%
Electricity per night	£5.00	S	£5.00	0.00	0.00%
Additional Adult	£4.40	S	£4.20	0.20	4.76%
Additional Child	£1.70	S	£1.60	0.10	6.25%
Awnings/Gazebos/Canopies	£8.10	S	£7.80	0.30	3.85%
Organised Groups (To be negotiated in advance)	By negotiation	S	By negotiation	-	-
Single backpacker (no vehicle)*	£14.00	S	£13.00	1.00	7.69%
Key Sale for Toilet Block	£28.75	S	£27.50	1.25	4.55%
Battery Charging	£7.00	S	£6.75	0.25	3.70%
Ice Packs	£1.30	S	£1.25	0.05	4.00%
Mobile Phone Charging	£1.40	S	£1.25	0.15	12.00%
* With discretion of caravan site manager at time of arrival					

## OPERATIONS

### 3.6 Harbour & annual licences (beach & boat related)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Regular users (per annum)</b>					
Mooring fees	£700.00	S	£655.00	45.00	6.87%
Tenders/Canoe/Kayak	£37.00	S	£35.00	2.00	5.71%
Tenders/Canoe/Kayak Day Rate	£4.60	S	£4.40	0.20	4.55%
<b>Harbour dues (per annum)</b>					
Up to 6100mm	£74.50	S	£72.00	2.50	3.47%
6100mm up to 9150mm	£142.00	S	£138.00	4.00	2.90%
9150mm up to 12200mm	£181.00	S	£175.00	6.00	3.43%
12200mm up to 15250mm	£238.00	S	£230.00	8.00	3.48%
Each additional 305mm over 15250mm	£6.50	S	£6.00	0.50	8.33%
<b>Other charges (per annum)</b>					
Large Hut Sites	£410.00	EX	£395.00	15.00	3.80%
Small Hut Sites	£280.00	EX	£267.00	13.00	4.87%
Hut selling fish on a regular basis	Under review	EX	Under review	-	-
<b>Stage sites</b>					
1E - 10E	£1,155.00	S	£1,120.00	35.00	3.13%
All other sites on Southwold Bank	£600.00	S	£580.00	20.00	3.45%
All other sites on Walberswick Bank	£600.00	S	£545.00	55.00	10.09%
Stage 25 LCC Harbour Dues	Per individual boat	S	Per individual boat	-	-



## OPERATIONS

### 3.6 Harbour & annual licences (beach & boat related) (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>W10 Mooring</b>					
Up to 6100mm	£21.00	S	£20.30	0.70	3.45%
6100mm up to 9150mm	£25.00	S	£24.00	1.00	4.17%
9150mm up to 12200mm	£30.50	S	£29.50	1.00	3.39%
12200mm up to 15250mm	£38.75	S	£37.50	1.25	3.33%
Each additional 305mm over 15250mm	£2.00	S	£1.85	0.15	8.11%
Harbour Dues	£10.00	S	£9.50	0.50	5.26%
Electric Charge (Normal)	£4.50	S	£4.50	0.00	0.00%
Electric Charge (Heavy Use)	£13.00	S	£13.00	0.00	0.00%
<b>Other charges</b>					
Storage ashore (per 305mm)	£2.85	S	£2.70	0.15	5.56%
Electric charge (weekly)	£30.00	S	£30.00	0.00	0.00%
Mooring winter charge (per 305mm/month)	£4.10	S	£3.90	0.20	5.13%
Mooring berth on north dock wall(including use of compound & facilities) per month	£155.00	S	£145.00	10.00	6.90%
<b>Licences</b>					
Beach Licences					
- Aldeburgh and Felixstowe	£60.00	OS	£58.00	2.00	3.45%
- Sizewell	£48.50	OS	£46.50	2.00	4.30%
Sale of fish from Council land	Variable	OS	Variable	-	-
Boats on beach	£135.00	S	£128.00	7.00	5.47%
Boats in compound at The Dip	£135.00	S	£128.00	7.00	5.47%
Launch only permit	£65.00	OS	£63.00	2.00	3.17%
Fee for return of confiscated boats	Variable	S	Variable	-	-

## OPERATIONS

### 3.7 Recreation areas & outdoor sports

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Beccles Sports Ground</b>					
<b>Cricket</b>					
<b>Adult one off match charge</b>					
- Weekdays	£67.25	S	£67.25	0.00	0.00%
- Weekdays (evenings)	£51.25	S	£51.25	0.00	0.00%
- Weekends and Bank Holidays	£91.25	S	£91.25	0.00	0.00%
<b>Adult block booking (minimum 11 matches)</b>					
- Weekdays	£57.75	S*	£57.75	0.00	0.00%
- Weekdays (evenings)	£43.75	S*	£43.75	0.00	0.00%
- Weekends and Bank Holidays	£84.75	S*	£82.25	2.50	3.04%
<b>Junior one off match charge</b>					
- Weekdays	£45.00	S	£45.00	0.00	0.00%
- Weekdays (evenings)	£36.50	S	£35.25	1.25	3.55%
- Weekends and Bank Holidays	£66.25	S	£66.25	0.00	0.00%
<b>Junior block booking (minimum 11 matches)</b>					
- Weekdays	£38.50	S*	£38.50	0.00	0.00%
- Weekdays (evenings)	£32.25	S*	£32.25	0.00	0.00%
- Weekends and Bank Holidays	£58.75	S*	£58.75	0.00	0.00%
<b>All weather surface</b>					
- Weekdays	£48.25	S	£48.25	0.00	0.00%
- Weekdays (evenings)	£33.25	S	£32.25	1.00	3.10%
- Weekends and Bank Holidays	£54.00	S	£54.00	0.00	0.00%
- Weekends and Bank Holidays (evenings)	£40.25	S	£40.25	0.00	0.00%

## OPERATIONS

### 3.7 Recreation areas & outdoor sports (continued)

				£	%
	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
<b>Beccles Sports Ground</b>					
<b>Football/Rugby</b>					
<b>Adult one off match charge</b>					
- Weekdays	£48.25	S	£48.25	0.00	0.00%
- Weekends and Bank Holidays	£63.25	S	£63.25	0.00	0.00%
<b>Adult block booking (minimum 11 matches)</b>					
- Weekdays	£39.75	S*	£39.75	0.00	0.00%
- Weekends and Bank Holidays	£49.75	S*	£49.75	0.00	0.00%
<b>Junior one off match charge</b>					
- Weekdays	£31.00	S	£31.00	0.00	0.00%
- Weekends and Bank Holidays	£38.25	S	£37.00	1.25	3.38%
<b>Junior block booking (minimum 11 matches)</b>					
- Weekdays	£18.25	S*	£18.25	0.00	0.00%
- Weekends and Bank Holidays	£23.50	S*	£23.50	0.00	0.00%
<b>Mini Football Pitch</b>	£15.50		£15.00	0.50	3.33%
<b>Dip Farm - Lowestoft</b>					
<b>Football</b>					
<b>Adult one off match charge</b>					
- Weekdays	£49.75	S	£48.25	1.50	3.11%
- Weekends and Bank Holidays	£65.25	S	£63.25	2.00	3.16%
<b>Adult block booking (minimum 11 matches)</b>					
- Weekdays	£41.00	S*	£39.75	1.25	3.14%
- Weekends and Bank Holidays	£51.25	S*	£49.75	1.50	3.02%
<b>Junior one off match charge</b>					
- Weekdays	£32.00	S	£31.00	1.00	3.23%
- Weekends and Bank Holidays	£38.25	S	£37.00	1.25	3.38%
<b>Junior block booking (minimum 11 matches)</b>					
- Weekdays	£19.00	S*	£18.25	0.75	4.11%
- Weekends and Bank Holidays	£24.25	S*	£23.50	0.75	3.19%

## OPERATIONS

### 3.7 Recreation areas & outdoor sports (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Eastward Ho and Walton Sports Ground - Felixstowe</b>					
<b>Football</b>					
Adult one off match charge					
- Weekdays	£48.25	S	£48.25	0.00	0.00%
- Weekends and Bank Holidays	£64.25	S	£64.25	0.00	0.00%
Adult block booking (minimum 8 matches)					
- Weekdays	£30.00	S*	£39.75	(9.75)	(24.53%)
- Weekends and Bank Holidays	£45.00	S*	£53.25	(8.25)	(15.49%)
Junior one off match charge					
- Weekdays	£31.00	S	£31.00	0.00	0.00%
- Weekends and Bank Holidays	£42.25	S	£42.25	0.00	0.00%
Junior block booking (minimum 8 matches)					
- Weekdays	£23.00	S*	£23.00	0.00	0.00%
- Weekends and Bank Holidays	£31.75	S*	£31.75	0.00	0.00%
<b>Walton Recreation Ground - Felixstowe</b>					
<b>Football</b>					
Mini soccer pitch					
- One off	£24.75	S	£24.00	0.75	3.13%
- Regular	£16.00	S	£15.50	0.50	3.23%

# OPERATIONS

## 3.7 Recreation areas & outdoor sports (continued)

				£	%
				Increase or (Decrease)	Increase or (Decrease)
Coronation Sports Ground Felixstowe	2021/22	VAT Status	2020/21		
<b>Cricket</b>					
<b>Adult one off match charge</b>					
- Weekdays	£52.00	S	£50.25	1.75	3.48%
- Weekdays (evenings)	£44.75	S	£43.25	1.50	3.47%
- Weekends and Bank Holidays	£79.75	S	£77.25	2.50	3.24%
<b>Adult block booking (minimum 8 matches)</b>					
- Weekdays	£43.75	S*	£42.25	1.50	3.55%
- Weekdays (evenings)	£37.75	S*	£36.50	1.25	3.42%
- Weekends and Bank Holidays	£66.75	S*	£64.75	2.00	3.09%
<b>Junior one off match charge</b>					
- Weekdays	£33.75	S	£32.75	1.00	3.05%
- Weekdays (evenings)	£30.50	S	£29.50	1.00	3.39%
- Weekends and Bank Holidays	£53.50	S	£51.75	1.75	3.38%
<b>Junior block booking (minimum 11 matches)</b>					
- Weekdays	£25.50	S*	£24.75	0.75	3.03%
- Weekdays (evenings)	£22.75	S*	£22.00	0.75	3.41%
- Weekends and Bank Holidays	£39.75	S*	£38.50	1.25	3.25%
<b>Rugby</b>					
<b>Adult one off match charge</b>					
- Weekdays	£49.75	S	£48.25	1.50	3.11%
- Weekends and Bank Holidays	£66.25	S	£64.25	2.00	3.11%

## OPERATIONS

### 3.7 Recreation areas & outdoor sports (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Coronation Sports Ground Felixstowe (continued)</b>					
<b>Rugby</b>					
<b>Adult block booking (minimum 8 matches)</b>					
- Weekdays	£41.00	S*	£39.75	1.25	3.14%
- Weekends and Bank Holidays	£55.00	S*	£53.25	1.75	3.29%
<b>Junior one off match charge</b>					
- Weekdays	£32.00	S	£31.00	1.00	3.23%
- Weekends and Bank Holidays	£43.75	S	£42.25	1.50	3.55%
<b>Junior block booking (minimum 8 matches)</b>					
- Weekdays	£23.75	S*	£23.00	0.75	3.26%
- Weekends and Bank Holidays	£32.75	S*	£31.75	1.00	3.15%
<b>Recreation Areas</b>					
Pavilion Hire (Cricket Pavilion, Dellwood Avenue, Felixstowe)	£74.75	S	£72.50	2.25	3.10%
Coronation Sports Ground Felixstowe					
Use of changing facilities	£33.75	S	£32.75	1.00	3.05%

\*Where a block booking meets all HMRC's criteria for block booking exemption, fees will be Exempt. Otherwise they are Standard rated.

## OPERATIONS

### 3.8 Beach huts & chalets

A premier site is defined as having no other beach hut in the direct line of sight towards the sea perpendicular to the front elevation of the beach hut. A standard site is one that have a hut immediately in front, obstructing the line of sight towards the sea.

				£	%
	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
<b>Sizewell</b>					
Premier site only	£621.64	S	£605.00	16.64	2.75%
Setting up of Beach Hut licence	£36.99	S	£36.00	0.99	2.75%
Administration fee for paying by instalments	£30.83	S	£30.00	0.83	2.77%

#### Southwold

The beach huts at Southwold are privately owned and positioned on sites leased from East Suffolk Council. (Please note there are currently no vacant sites available). Some beach hut owners do provide short term lettings of their huts. For further information please contact the [Southwold Beach Hut Owners Association](#).

For beach site tenants who wish to claim a discount for being a local resident, please submit a [Southwold Beach Hut Principal Residence Discount Claim Form](#). The form must be completed in respect of each and every year and returned to our [Asset Management Team](#) by the end of March in each year.

Discounts for membership of the Association will be directly verified with the Association.

#### Lowestoft

You can access current fees and booking system via <https://www.hirebeachhuts.co.uk/> or calling (01502) 532541.

## OPERATIONS

### 3.8 Beach Huts & Chalets (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Felixstowe huts</b>					
Setting up of Beach Hut licence	£656.57	S	£639.00	17.57	2.75%
Setting up of Beach Hut licence - transfer within family (must provide evidence)	£131.52	S	£128.00	3.52	2.75%
Administration fee for paying by instalments	£30.83	S	£30.00	0.82	2.75%
Premier site	£621.64	S	£605.00	16.64	2.75%
Premier surcharge (per sqm where the site exceeds 2.13m width x 2.43m depth)	£178.79	S	£174.00	4.79	2.75%
Standard site	£497.31	S	£484.00	13.31	2.75%
Standard surcharge (per sqm where the site exceeds 2.13m width x 2.43m depth)	£156.18	S	£152.00	4.18	2.75%
<b>Felixstowe chalets</b>					
<b>Bath Tap</b>					
- Chalets 1 - 4, 9 - 20, 27 - 36 (26)	£2,167.00	S	£2,109.00	58.00	2.75%
- Chalets 5 - 8 (4)	£1,681.00	S	£1,636.00	45.00	2.75%
- Chalets 21 - 26 (6)	£1,681.00	S	£1,636.00	45.00	2.75%
<b>Cliff House</b>					
- Chalets 1 and 2	£793.23	S	£772.00	21.23	2.75%
- Chalets 3 and 4	£1,178.54	S	£1,147.00	31.54	2.75%
- Chalet 5	£1,681.00	S	£1,636.00	45.00	2.75%
- Chalets 6-17 (12)	£1,369.28	S	£1,147.00	222.28	19.38%
- Chalets 18 - 25 (8)	£1,681.00	S	£1,636.00	45.00	2.75%
- Chalets 26 - 41 (16)	£2,167.00	S	£2,109.00	58.00	2.75%
Administration fee for paying by instalments	£30.83	S	£30.00	0.83	2.77%
Setting up of chalet licence	£36.99	S	£36.00	0.99	2.75%



## 3.9 Leisure facilities

Brackenbury Leisure Centre, Deben Leisure Centre, Felixstowe Leisure Centre & Leiston Leisure Centre are managed by Places Leisure For more information see below contact details:

<a href="#">Brackenbury Leisure Centre   Felixstowe</a>	01394 270278
<a href="#">Deben Leisure Centre   Woodbridge</a>	01394 388991
<a href="#">Felixstowe Leisure Centre   Felixstowe</a>	01394 694600
<a href="#">Leiston Leisure Centre   Leiston</a>	01728 832700

The Leisure Operator Contract for Water Lane and Waveney Valley Leisure Centres has yet to be awarded, if you have any queries please contact the Leisure Contract Manager, Tim Snook  
Tim.snook@eastsoffolk.gov.uk. Telephone number: 03330162000.

## OPERATIONS

### 3.10 Cemeteries

*Interment charges are doubled for anyone not registered at the time of death as a resident of East Suffolk. However, if a resident has been required to move out of the area for medical care or to a nursing home within the last two years due to ill-health, a single fee would apply. Proof of previous residency and date of move would be required by the Cemeteries Office with the Notice of Interment. It is the responsibility of the family or Funeral Director to provide this information, failure to do so will result in the payment of double fees.*

*Fees detailed below marked "\*\*", are not applicable for grave spaces where Exclusive Right of Burial was purchased between 1st May 1995 and 1st April 2003*

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Interments (first and subsequent) for Purchased Graves</b>					
Stillborn child or aged under 18 years	No charge	OS	No charge	-	-
A person over age 18 (Aldeburgh, Leiston, Saxmundham and Woodbridge cemeteries)					
- Standard Depth	£781.00	OS	£781.00	0.00	0.00%
- Double Depth	£921.00	OS	£921.00	0.00	0.00%
- Treble Depth	£1,066.00	OS	£1,066.00	0.00	0.00%
A person over age 18 (Beccles, Bungay, Halesworth, Kirkley, Lowestoft, Southwold and Wrentham cemeteries)					
- Standard Depth	£700.00	OS	560.00	140.00	25.00%
- Double Depth	£775.00	OS	625.00	150.00	24.00%
- Treble Depth	£900.00	OS	700.00	200.00	28.57%
For the interment of ashes in a grave or ashes plot	£234.50	OS	227.50	7.00	3.08%
For the interment of two sets of ashes at the same time	£309.00	OS	300.00	9.00	3.00%
For the scattering of ashes	£103.00	OS	100.00	3.00	3.00%
For the interment of body parts to an existing grave	£187.50	OS	182.00	5.50	3.02%

## OPERATIONS

### 3.10 Cemeteries (continued)

Interments (first and subsequent) for Common Graves / Unmarked Graves	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Stillborn child or aged under 18 years	No charge	OS	No charge	-	-
A person over age 18					
- Standard Depth	£556.00	OS	£540.00	16.00	2.96%
- Double Depth	£648.50	OS	£630.00	18.50	2.94%
- Treble Depth	£823.50	OS	£800.00	23.50	2.94%
Cancellation of burial arrangements 48 hours prior to burial	50% of fee	OS	50% of fee		
Cancellation of burial arrangements less the 48 hours prior to burial	100% of fee	OS	100% of fee		
Exhumation					
- Of a body	£1,112.00	S	£1,112.00	0.00	0.00%
- Of cremated remains	£450.00	S	£450.00	0.00	0.00%
<b>Exclusive Right of Burial (Period of 25 years) - Excludes Common/Unpurchased graves</b>					
For exclusive right of burial in an earthen grave space 9' x 4' (2743mm x 1219mm) (Aldeburgh, Leiston, Saxmundham and Woodbridge cemeteries)	£1,534.00	OS	£1,534.00	0.00	0.00%
For exclusive right of burial in an earthen grave space 9' x 4' (2743mm x 1219mm) (Beccles, Bungay, Halesworth, Kirkley, Lowestoft, Southwold and Wrentham cemeteries)	£825.00	OS	£675.00	150.00	22.22%
For exclusive right of burial in an earthen ashes plot 2' x 2' (609mm x 609mm) (Aldeburgh, Leiston, Saxmundham and Woodbridge cemeteries)	£1,426.00	OS	£1,426.00	0.00	0.00%
For exclusive right of burial in an earthen ashes plot 2' x 2' (609mm x 609mm) (Beccles, Bungay, Halesworth, Kirkley, Lowestoft, Southwold and Wrentham cemeteries)	£550.00	OS	£450.00	100.00	22.22%

## OPERATIONS

### 3.10 Cemeteries (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Exclusive Right of Burial (Period of 25 years) - Excludes Common/Unpurchased graves</b>					
For exclusive right of burial in a children's plot 5' x 2' (1524mm x 609mm)	£458.00	OS	£445.00	13.00	2.92%
For exclusive right of burial in a children's plot 3' x 2' (914mm x 609mm)	£425.00	OS	£413.00	12.00	2.91%
Extension of Exclusive Right of Burial for a Period of 10 years					
- In an earthen grave space 9' x 4' (2743mm x 1219mm)	£224.00	OS	£217.50	6.50	2.99%
- In an earthen ashes plot 2' x 2' (609mm x 609mm)	£149.50	OS	£145.00	4.50	3.10%
<b>Monuments and Headstones (Memorials permitted on any section, including lawns)</b>					
Headstones, crosses etc. (maximum height of 36"/920mm)*	£230.00	S	£223.50	6.50	2.91%
Headstones, crosses etc. on children's graves and on ashes plots (maximum height 24"/609mm)*	£130.50	S	£130.50	0.00	0.00%
Headstones, crosses etc. on gardens of rest ashes plots (maximum height 24"/609mm) Aldeburgh, Leiston & Saxmundham only	£134.50	S	£130.50	4.00	3.07%
A plaque or desk (maximum height 6"/152mm)*	£134.50	S	£130.50	4.00	3.07%
A plaque on memorial wall 9" x 6" (229mm x 152mm)	£230.00	S	£223.50	6.50	2.91%
Flower vase with inscription (maximum height 11 3/4"/300mm)*	£102.50	S	£99.50	3.00	3.02%
For every additional inscription	£58.00	S	£56.00	2.00	3.57%
<b>Kerb Sets (Traditional Section only) - Excludes headstone fee</b>					
For single					
- A full kerb set (max length 83"/2100mm)*	£255.00	S	£247.50	7.50	3.03%
- A half kerb set (length between 19" and 42"/480mm and 1050mm)*	£134.50	S	£130.50	4.00	3.07%
- A small kerb set (maximum length 19"/480mm)*	£102.50	S	£99.50	3.00	3.02%

## OPERATIONS

### 3.10 Cemeteries (continued)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Kerb Sets (Traditional Section only) - Excludes headstone fee</b>					
For double grave space					
- A full kerb set (max length 83"/2100mm)*	£510.00	S	£495.50	14.50	2.93%
- A half kerb set (length between 19" and 42"/480mm and 1050mm)*	£311.00	S	£302.00	9.00	2.98%
- A small kerb set (maximum length 19"/480mm)*	£237.00	S	£230.00	7.00	3.04%
<b>All areas</b>					
Memorial renovation/replacement/application	£48.00	S	£46.75	1.25	2.67%
<b>Other charges</b>					
Use of cemetery chapel	£180.50	EX	£175.00	5.50	3.14%
Appointment with cemetery staff	£48.50	S	£46.75	1.75	3.74%
Cemetery staff locating and marking grave	£48.50	S	£46.75	1.75	3.74%
Staff search of burial records (per register)	£48.50	S	£46.75	1.75	3.74%
Personal search of burial records (per register)	£26.50	S	£25.85	0.65	2.51%
For a certified copy of entry in register or burials	£26.50	S	£25.85	0.65	2.51%
Statutory declaration relating to burial records	£112.50	OS	£109.00	3.50	3.21%
Updating grants of exclusive rights of burial	£37.50	S	£36.25	1.25	3.45%
Transfer of grant of right of burial	£64.50	OS	£62.25	2.25	3.61%

## OPERATIONS

### 3.11 Green burials

Green Burial Site	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Interments (first and subsequent) burial fees</b>					
Stillborn child or aged under 18 years	No charge	OS	No charge	-	-
A person over age 18 (single depth)	£540.00	OS	£540.00	0.00	0.00%
For the interment of ashes in a grave or ashes plot	£230.00	OS	£215.00	15.00	6.98%
For the interment of two sets of ashes at the same time	£300.00	OS	£290.00	10.00	3.45%
For the scattering of ashes	£103.00	OS	£100.00	3.00	3.00%
Provision of plaque on memorial board	£67.00	S	£65.00	2.00	3.08%

## 4.1 Street Name &amp; Numbering

				£	%
	2020/21	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
<b>Existing</b>					
Property renaming/addition of house name	£39.00	OS	£39.00	£0.00	0.00%
Provision of naming & numbering information to utilities	£368.00	OS	£368.00	£0.00	0.00%
Naming & numbering enquiries from solicitors/utilities not subscribed - new or historic addresses	£78.00	OS	£78.00	£0.00	0.00%
Re-numbering of scheme following development re-plan (after notification of approved naming and numbering scheme issued) either individuals or developers	£78.00	OS	£78.00	£0.00	0.00%
<b>Addressing New Development</b>					
1 plot	£39.00	OS	£39.00	£0.00	0.00%
2-5 plots (including new streets)	£78.00	OS	£78.00	£0.00	0.00%
6-10 plots (including new streets)	£150.00	OS	£150.00	£0.00	0.00%
11-20 plots (including new streets)	£300.00	OS	£300.00	£0.00	0.00%
21-50 plots (including new streets)	£800.00	OS	£800.00	£0.00	0.00%
51-100 plots (including new streets)	£1,200.00	OS	£1,200.00	£0.00	0.00%
101+ plots (including new streets)	£1,200.00 base charge + £10.00 per plot	OS	£1,200 base charge + £10 per plot	-	-
<b>Provision or relocation of street name plates</b>					
Set of street nameplates (2) supplied and installed	£435.00	S	£435.00	£0.00	0.00%
Re-locating street name plate	£150.00	S	£150.00	£0.00	0.00%

### 5.1 Filming & Commercial Photography

Please contact [Screen Suffolk](#) if you wish to undertake any filming or commercial photography within the District.

### 5.2 Events Area

Set up / break down days i.e. non trading days are charged at 50% of the charge rates list below. Electricity charges are a flat rate of **£10.00 per charging point per day**. Commercial and national charities will incur an administrative charge and a commercial fee whilst local community and charity events will incur an administrative charge only.

Please note that there may be additional costs incurred for particular events, which will be calculated on a case by case basis. These can include (but are not constrained to):

**Damage deposit** (refundable if no damage occurs)

**Licensing fees**

**Parking** - Loss of income and parking bay suspensions

**Waste management**

**Event monitoring** - In compliance with policy and location hire agreement

**Highways** - Road closure and signage costs (payable directly to Suffolk County Council)



## ECONOMIC DEVELOPMENT & REGEN

### 5.2 Events Area (continued)

#### Small - Outdoor theatre, fundraising & music events (under 500 attendees, per day)

	2021/22			VAT Status
	Commercial	Charity (national)	Charity (local)	
Application fee	£53.50	£53.50	£27.00	EX
Hire charge (per day)				
- Felixstowe Events Area	£318.00	£160.00	No charge	EX
- Parks, promenade, gardens and village green	£318.00	£160.00	No charge	EX
- Felixstowe Triangle	£106.00	£53.50	No charge	EX
- Promotional stands (per metre)	£10.50	£5.00	No charge	EX

*A local charity is described as charity that is registered within Suffolk and/or operates within the East Suffolk district, providing a variety of goods, products or services that are needed to the local population.*

	2020/21								
	Commercial			Charity (national)			Charity (local)		
	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)
Application fee	£52.00	2.88%	1.50	£52.00	2.88%	1.50	£26.00	3.85%	1.00
Hire charge (per day)									
- Felixstowe Events Area	£309.00	2.91%	9.00	£155.00	3.23%	5.00	No charge	-	-
- Parks, promenade, gardens and village green	£309.00	2.91%	9.00	£155.00	3.23%	5.00	No charge	-	-
- Felixstowe Triangle	£103.00	2.91%	3.00	£52.00	2.88%	1.50	No charge	-	-
- Promotional stands (per metre)	£10.00	5.00%	0.50	£5.00	0.00%	0.00	No charge	-	-

## ECONOMIC DEVELOPMENT & REGEN

### 5.2 Events Area (continued)

#### Medium - Circus, fun fair, music event, sports event & open air cinema (500 - 2999 attendees, per day)

	2021/22			VAT Status
	Commercial	Charity (national)	Charity (local)	
Application fee	£53.50	£53.50	£27.00	EX
Hire charge (per day)				
Events Area	£636.00	£318.00	No charge	EX
Parks, promenade, gardens and village green	£636.00	£318.00	No charge	EX
Promotional stands (per metre)	£10.50	£5.00	No charge	EX

*A local charity is described as charity that is registered within Suffolk and/or operates within the East Suffolk district, providing a variety of goods, products or services that are needed to the local population.*

	2020/21								
	Commercial			Charity (national)			Charity (local)		
	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)
Application fee	£52.00	2.88%	1.50	£52.00	2.88%	1.50	£26.00	3.85%	1.00
Hire charge (per day)									
Events Area	£618.00	2.91%	18.00	£309.00	2.91%	9.00	No charge	-	-
Parks, promenade, gardens and village green	£618.00	2.91%	18.00	£309.00	2.91%	9.00	No charge	-	-
Promotional stands (per metre)	£10.00	5.00%	0.50	£5.00	0.00%	0.00	No charge	-	-

## ECONOMIC DEVELOPMENT & REGEN

### 5.2 Events Area (continued)

**Large - Carnival, art on prom, historic car rally, commercial launches, commercial shows, sports event (over 3000 attendees, per day)**

	2021/22			VAT Status
	Commercial	Charity (national)	Charity (local)	
Application fee	£106.00	£106.00	£53.50	EX
Hire charge (per day)				
Events Area	£1,059.00	£636.00	No charge	EX
Parks, promenade, gardens and village green	£1,059.00	£636.00	No charge	EX
Promotional stands (per metre)	£10.50	£5.00	No charge	EX

*A local charity is described as charity that is registered within Suffolk and/or operates within the East Suffolk district, providing a variety of goods, products or services that are needed to the local population.*

	2020/21								
	Commercial			Charity (national)			Charity (local)		
	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)	2020/21	% Increase or (Decrease)	£ Increase or (Decrease)
Application fee	£103.00	2.91%	3.00	£103.00	2.91%	3.00	£52.00	2.88%	1.50
Hire charge (per day)									
Events Area	£1,029.00	2.92%	30.00	£618.00	2.91%	18.00	£0.00	(100.00%)	(£400.00)
Parks, promenade, gardens and village green	£1,029.00	2.92%	30.00	£618.00	2.91%	18.00	£0.00	(100.00%)	(£400.00)
Promotional stands (per metre)	£10.00	5.00%	0.50	£5.00	0.00%	0.00	No charge	-	-

## 5.3 Sponsorship of Memorial Benches

All fees are for a 10 year sponsorship period from the date on installation

	2021/22	2020/21 From 1 Nov 2020	% Increase or (Decrease)	£ Increase or (Decrease)	VAT Status
Plaque* only	£129.38	£125.00	3.50%	4.38	OS
Plaque* and new bench	£1,345.50	£1,300.00	3.50%	45.50	OS
New base, bench and plaque*	£1,863.00	£1,800.00	3.50%	63.00	OS
*The plaque remains the property of the sponsor					

## 6.1 Community infrastructure levy (CIL)

The Community Infrastructure Levy is the new way in which councils collect financial contributions from developers to help pay for new and improved infrastructure. East Suffolk Council is the Charging Authority for the District excluding the area covered by the Broads Authority.

The rates shown are those payable as from the 1st January and will be increased on the 1st January each year in line with the Building Cost Information Services All In Tender Price Index as published in November each year.

[East Suffolk Community Infrastructure Levy](#)

Community Infrastructure Levy	2021/22	VAT Status	2020/21
CIL Charging Schedule	Variable	OS	Variable
CIL Regulation 123 List	Variable	OS	Variable
CIL Instalments Policy	Variable	OS	Variable
CIL Discretionary Social Housing Relief Policy	Variable	OS	Variable

## 6.2 Pre application planning advice

Discretionary fees currently published under pre application planning advice are currently undergoing a county wide review. Therefore the fees listed have remained static at 2018/19 levels whilst the review is undertaken.

### Exemptions

- Pre-application advice to Town or Parish Councils for their own developments.
- Proposals that would be exempt from planning application fees for the following reasons:
  - Extension and alterations to a dwelling house where a Disabled Person\* resides or proposes to reside or the carrying out of operations within the curtilage of such a dwelling house for the purpose in either case of improving the access, safety, health or comfort of the disabled person.
  - Provision of means of access for Disabled Persons\* at buildings/premises to which members of the public are admitted.
  - Schemes located within areas covered by Local Development Orders and which meet the requirements of the relevant Order.

\* Section 29 of the National Assistance Act 1948

## PLANNING & COASTAL MANAGEMENT

### 6.2 Pre application planning advice (continued)

				£	%
General Enquiries	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
Permitted development	£43.50	S	£43.50	0.00	0.00%
Householder	£43.50	S	£43.50	0.00	0.00%
<b>Residential</b>					
2-5 dwellings	£125.00 per dwelling	S	£125.00 per dwelling	0.00	0.00%
6-9 dwellings	£930.00	S	£930.00	0.00	0.00%
10-30 dwellings	£930.00 + £90.00 per dwelling	S	£930.00 + £90.00 per dwelling	0.00	0.00%
31-50 dwellings	£930.00 + £90.00 per dwelling	S	£930.00 + £90.00 per dwelling	0.00	0.00%
51-99 dwellings	£310.00 cost for initial meeting	S	£310.00 cost for initial meeting	0.00	0.00%
100+ dwellings	£310.00 cost for initial meeting	S	£310.00 cost for initial meeting	0.00	0.00%
<b>Commercial</b>					
1 - 40sq m	£186.50	S	£186.50	0.00	0.00%
41- 100sq m	£186.50	S	£186.50	0.00	0.00%
101 - 250sq m	£125.00 + £125.00 per 200m <sup>2</sup>	S	£125.00 + £125.00 per 200m <sup>2</sup>	0.00	0.00%
251 - 500sq m	£125.00 + £125.00 per 200m <sup>2</sup>	S	£125.00 + £125.00 per 200m <sup>2</sup>	0.00	0.00%
501 - 1,000sq m	£125.00 + £125.00 per 200m <sup>2</sup>	S	£125.00 + £125.00 per 200m <sup>2</sup>	0.00	0.00%
1,001 - 10,000sq m	£620.00 + £125.00 per 1000m <sup>2</sup>	S	£620.00 + £125.00 per 1000m <sup>2</sup>	0.00	0.00%
10,001+ sq m (1Ha)	Negotiated charge	S	Negotiated charge	-	0.00%

## PLANNING & COASTAL MANAGEMENT

### 6.2 Pre application planning advice (continued)

Other	2021/22	VAT Status	2020/21	£	%
				Increase or (Decrease)	Increase or (Decrease)
Certificate of lawfulness	£93.00	S	£93.00	0.00	0.00%
Advertisements	£43.50	S	£43.50	0.00	0.00%
Telecommunications	see Commercial above	S	see Commercial above		
Listed buildings	£93.00	S	£93.00	0.00	0.00%
Change of use	£93.00	S	£93.00	0.00	0.00%
Shop fronts	£93.00	S	£93.00	0.00	0.00%
Tree inspection and hedgerow - Householders	£93.00	S	£93.00	0.00	0.00%
Tree inspection and hedgerow - All others	£240.00	S	£240.00	0.00	0.00%
Anemometer masts or single wind turbines of less than 100m:					
Up to 20m	£93.00	S	£93.00	0.00	0.00%
20m to 50m	No charge	S	No charge	-	-
Above 50m	Negotiated	S	Negotiated	-	-

### 6.3 Public path orders & agreements

Per application	2021/22	VAT Status	2020/21	£	%
				Increase or (Decrease)	Increase or (Decrease)
Hourly charge	£60.00	OS	£59.00	1.00	1.69%

## PLANNING & COASTAL MANAGEMENT

### 6.4 Local land charges

Official Enquiries	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Full search	£155.00	S	£150.00	5.00	3.33%
Full search additional parcel	£18.30	S	£17.80	0.50	2.81%
LLC1	£27.00	OS	£26.00	1.00	3.85%
LLC1 register part	£7.80	OS	£7.60	0.20	2.63%
LLC1 additional parcel	£4.25	OS	£4.10	0.15	3.66%
Full CON29R	£128.00	S	£124.00	4.00	3.23%
Con 29 additional parcel	£14.10	S	£13.70	0.40	2.92%
Con 29 additional question	£23.25	S	£22.60	0.65	2.88%
Con 29 R individual questions (each)	£3.30	S	£3.20	0.10	3.12%
Con 29 optional enquiry	£21.75	S	£21.10	0.65	3.08%
Personal search	£21.80	OS	£21.20	0.60	2.83%
Solicitor fees for retrieval of documents (under 15 year old document)	*To be removed*	OS	£9.30	-	-
Solicitor fees for retrieval of documents	£21.70	OS	21.10	0.60	2.84%
Administration fee	£20.00	OS	*NEW*		

### 6.5 Planning policy & delivery

All Local Plan/supporting documents for East Suffolk Council are available free of charge online - <http://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/>.

Hard copies of documents are available on request. We will normally charge 20p per A4 sheet plus £1.50 for postage.

Hard copies of Policies Maps are also available on request and will be charged at the following price as per the size of map (price includes £1.50 postage)

	2021/22	VAT Status	2020/21	£	%
A0	£9.50	S	9.50	0.00	0.00%
A1	£5.50	S	5.50	0.00	0.00%
A3	£2.50	S	2.50	0.00	0.00%
A4	£1.70	S	1.70	0.00	0.00%

Normally hard copies of any consultation documents produced will remain free of charge to the public.



## HOUSING SERVICES

### 7.1 Houses of multiple occupancy licences

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Properties with up to and including five lettable units	£680.00	OS	£670.00	10.00	1.49%
Extra charge for each unit over five	£22.00	OS	£22.00	0.00	0.00%
Relicensing fee (after five years) if no structural changes etc. to premises	£135.00	OS	£133.00	2.00	1.50%
Varying a current licence if no structural changes etc. to premise	No charge	OS	No charge	-	-

### 7.2 Enforcement notices on private sector landlords

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Serving of Enforcement Notice	£495.00	OS	£485.00	10.00	2.06%

### 7.3 Immigration issues

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Cost of inspections	£360.00	OS	£360.00	0.00	0.00%

### 7.4 Park home fees

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>New Licence (relevant protected sites only)</b>					
<i>Processing</i>					
Examine application documentation, associated certificates. Check to ensure that details are correct and correct fee is attached (60 mins)	£52.39	OS	£48.53	3.86	7.95%
Make assessment of site layout, provision of amenities/utilities, examine fire risk assessment (60 mins)	£52.39	OS	£48.53	3.86	7.95%
Finance receive payment of fee, process payment and issue receipt (60 mins)	£52.39	OS	£48.53	3.86	7.95%

## HOUSING SERVICES

### 7.4 Park home fees (continued)

				£	%
	2021/22	VAT Status	2020/21	Increase or (Decrease)	Increase or (Decrease)
<b>New Licence (relevant protected sites only) continued</b>					
<b>Inspection</b>					
1-5 Verification inspection of the site (60 mins)	£52.39	OS	£48.53	3.86	7.95%
6-24 Verification inspection of the site (90 mins)	£78.56	OS	£72.80	5.76	7.91%
25-99 Verification inspection of the site (120 mins)	£104.78	OS	£97.06	7.72	7.95%
100+ Verification inspection of the site (180 mins)	£157.17	OS	£145.59	11.58	7.95%
<b>Issue of New Licence</b>					
Prepare licence documents and certificates (120 mins)	£104.78	OS	£97.06	7.72	7.95%
Check and sign certs/licence as necessary, and serve by post (30 mins)	£26.20	OS	£24.27	1.93	7.95%
Update database register and public register (20 mins)	£17.45	OS	£16.16	1.29	7.98%
1-5 Combined adjusted total fees for new park home licence applications	£357.99	OS	£331.61	26.38	7.96%
6-24 Combined adjusted total fees for new park home licence applications	£384.16	OS	£355.88	28.28	7.95%
25-99 Combined adjusted total fees for new park home licence applications	£410.38	OS	£380.14	30.24	7.95%
100+ Combined adjusted total fees for new park home licence applications	£462.77	OS	£428.67	34.10	7.95%
<b>Annual Fee (relevant protected sites only)</b>					
1-3 Number of pitches	No charge	OS	No charge	-	-
4-5 Number of pitches - (185 mins admin time) (140 mins inspection time)	£283.78	OS	£262.87	20.91	7.95%
6-24 Number of pitches - (200 mins admin time) (210 mins inspection time)	£358.00	OS	£331.63	26.37	7.95%
25-99 Number of pitches - (270 mins admin time) (390 mins inspection time)	£576.29	OS	£553.84	22.45	4.05%
100-199 Number of pitches - (375 mins admin time) (800 mins inspection time)	£1,025.97	OS	£950.38	75.59	7.95%
200+ Number of pitches - (450 mins admin time) (1080 mins inspection time)	£1,335.95	OS	£1,237.52	98.43	7.95%

## HOUSING SERVICES

### 7.4

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>Variations and Amendments</b>					
License Variation (plus inspection fee if applicable)	£152.79	OS	£141.52	11.27	7.96%
Examine amended application documents and associated certificates. Check to ensure details are correct and correct fee is attached (60mins)	£52.39	OS	£48.53	3.86	7.95%
Check site history for any outstanding issues (30 mins)	£26.20	OS	£24.27	1.93	7.95%
Make decision as to whether amendments are appropriate (30 mins)	£26.20	OS	£24.27	1.93	7.95%
Prepare new licence documents (20 mins)	£17.45	OS	£16.16	1.29	7.98%
Check, sign and post new documents (15 mins)	£13.10	OS	£12.13	0.97	8.00%
Update database and public register (20 mins)	£17.45	OS	£16.16	1.29	7.98%
<b>Site Inspection Fees</b>					
1-5 Verification inspection of the site (60 mins)	£52.39	OS	£48.53	3.86	7.95%
6-24 Verification inspection of the site (90 mins)	£78.59	OS	£72.80	5.79	7.95%
25-99 Verification inspection of the site (120 mins)	£104.78	OS	£97.06	7.72	7.95%
100+ Verification inspection of the site (180 mins)	£157.17	OS	£145.59	11.58	7.95%
<b>Licence Transfer fee</b>					
Transfer	£222.63	OS	£206.21	16.42	7.96%
Check form is correct including correct fee (30 mins)	£26.20	OS	£24.27	1.93	7.95%
Check site history and any outstanding issues (30 mins)	£26.20	OS	£24.27	1.93	7.95%
Examine request documentation and make decision (60 mins)	£52.39	OS	£48.53	3.86	7.95%
Prepare new licence documents (20 mins)	£17.45	OS	£16.16	1.29	7.98%
Check, sign and post new documents (15 mins)	£13.10	OS	£12.13	0.97	8.00%
Update database and public register (20 mins)	£17.45	OS	£16.16	1.29	7.98%
Deposit of site rules - examine rules, checking for banned rules (60 mins)	£52.39	OS	£48.53	3.86	7.95%
Deposit of site rules - update database and public register (20 mins)	£17.45	OS	£16.16	1.29	7.96%

## HOUSING SERVICES

### 7.5 Landlord smoke detectors

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
First offence	£600.00	OS	£590.00	10.00	1.69%
First offence (If paid within 14 day period from date of service)	£450.00	OS	£430.00	20.00	4.65%
Second offence	£2,500.00	OS	£2,500.00	0.00	0.00%
Third and subsequent offences	£5,000.00	OS	£5,000.00	0.00	0.00%

### 7.6 Enforcement action (works in default)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Cost of works undertaken plus officer time costs	100% of costs + £52.39 per hour	OS	100% of costs + £48.53 per hour	-	-

### 7.7 Civil penalties (Housing Act 2004)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Penalty maximum	£30,000.00	OS	£30,000.00	0.00	0.00%
<i>Actual penalty applied is calculated in accordance with the relevant policy</i>					

## HOUSING SERVICES

### 7.8 Minimum energy efficiency standards

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Substandard property let unlawfully for less than three months	£2,000.00	OS	£2,000.00	0.00	0.00%
Substandard property let unlawfully for three months and over	£4,000.00	OS	£4,000.00	0.00	0.00%
Failure to comply with compliance notice	£2,000.00	OS	£2,000.00	0.00	0.00%
Registering a false exemption	£1,000.00	OS	£1,000.00	0.00	0.00%

### 7.9 Assistance service (renovation grants / disabled facilities grants)

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Assistance with making an application for a Renovation Grant (over £5K) - inc. tendering process and supervision of works	15% of eligible assistance package	S	15% of eligible assistance	0.00	0.00%
Assistance with making an application for a Disabled Facilities Grant - inc. tendering process and supervision of works	15% of eligible assistance package	S	15% of eligible assistance	0.00	0.00%
Assistance with making an application for a Minor Works Grant - inc. tendering process and supervision of works	10% of eligible assistance package	S	10% of eligible assistance	0.00	0.00%
Assistance with making an application for a Priority Grant (Disabled Facilities) - inc. tendering process and supervision of works	10% of eligible assistance package	S	10% of eligible assistance	0.00	0.00%
Assistance with making an application for a Fast Track Disabled Facilities Grant - inc. tendering process and supervision of works	10% of eligible assistance package	S	10% of eligible assistance	0.00	0.00%
Assistance with making an application for a Warm Homes Grant - inc. tendering process and supervision of works	10% of eligible assistance package	S	10% of eligible assistance	0.00	0.00%
Assistance with privately funded adaptation works -inc. tendering process and supervision of works	15% of eligible package	S	15% of eligible package	0.00	0.00%
Assistance with completing an application for a Grant (any type) - not including tendering process or supervision of works	£145.00	S	£145.00	0.00	0.00%

## HOUSING SERVICES

### 7.10 Landlord references

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Landlord Reference (Right to Buy Scheme)	No charge	S	No charge	-	-

### 7.11 Garage rents

	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
<b>WEF 1 April 2019</b>					
HRA Tenants (per week based on a 50 week year) *	£8.50	OS	£8.00	0.50	6.25%
Private Tenants (per week based on a 50 week year and inclusive of 20% VAT) *	£11.90	S	£11.40	0.50	4.39%
<b>*2021/22 garage rents to be effective from 1st April 2021 proposed as part of the HRA budget report in February 2021</b>					

### 7.12 Mutual exchange fees

Application	2021/22	VAT Status	2020/21	£ Increase or (Decrease)	% Increase or (Decrease)
Electric safety check	£88.91	S	£86.40	2.51	2.91%
Gas safety check - Boiler inspection	No charge	OS	No charge	-	-

# Statutory Fees and Charges

## 2021/22

### East Suffolk Council



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## FEES AND CHARGES NOTE

### **Note**

Generally any increase in fees and charges will take effect from 1st April 2021 and apply through to 31st March 2022. Details of variations from this date, for example, where committee are due to approve fees at a later date, are included in the schedule.

The prices quoted in this book are inclusive of Value Added Tax (VAT) when applicable, therefore individuals and companies do not need to add VAT to the price shown. Please refer to the VAT code key below for further details.

### **VAT Code Key**

The current standard rate of VAT is 20%.

This schedule for fees and charges show the rate of VAT applicable which is denoted by one of the following abbreviations;

S	Standard Rated
EX	Exempt
OS	Outside Scope
ZE	Zero Rated

### **Photocopying**

Photocopying charges for East Suffolk Council will include an initial charge of £10.00 with an additional charge of 50p per A4 sheet.

# ENVIRONMENTAL & PORT HEALTH

## 1.1 Port health inspection charges

Port Health inspection charges are calculated annually on a cost recovery basis. This means that the charges represent the cost of staff salaries plus on costs; that is the cost of providing the office space and other equipment. Where legislation requires that sampling and analysis is carried out, charges will include the cost of any materials such as sterile scoops that are needed.

Where the cost of sampling and analysis is known this has been shown below, however, for many products the cost of the sample varies depending on size and the nature of the analysis. Samples that appear unsatisfactory will be subject to confirmatory testing to establish exact levels which will increase the cost.

The Charges		
	Products of Animal Origin Catch certification under the IUU fishing controls Radiation Controls Food and Feed from Japan Gaur Gum from India Plastic Kitchenware from China and Hong Kong Other Charges	GM Controls Rice and Rice products from China Organic Certificate verification Ship Inspection Charges for Ship Sanitation Certificates Water Sampling on vessels High Risk Products - Common Entry Document (CED) charges

The above categories set out above for current charges can be found on the Suffolk Coastal Port Health Authority website below.

<http://www.porthealth.eu/fees.htm>

Port Health have an accounts system where agents and importers are able to deposit money directly to Port Health for use as documents are submitted. Payment can be made by BACs, cheque, over the phone or online. The quickest method to pay is by BACs.

# ENVIRONMENTAL & PORT HEALTH

## 1.2 Lowestoft Port Health - Charges for Inspections of ships (Sanitation Inspection Certificates)

Ship Inspection Charges	2021/22	VAT Status
A fixed fee will be charged for Ship Sanitation Inspections at the current rates agreed by the Association of Port Health Authorities.		
Health Authorities.		
- Ships up to 1,000 gross tonnage	£105.00	NB
- Ships from 1,001 to 3,000 gross tonnage	£140.00	NB
- Ships from 3,001 to 10,000 gross tonnage	£210.00	NB
- Ships from 10,001 to 20,000 gross tonnage	£270.00	NB
- Ships from 20,001 to 30,000 gross tonnage	£345.00	NB
- Ships over 30,000 gross tonnage	£405.00	NB
With the exception of:		
Vessels with the capacity to carry between 50 and 1,000 persons	£405.00	NB
Vessels with the capacity to carry more than 1,000 persons	£690.00	NB
Extensions	£75.00	NB

The above fees are proposed by Association of Port Health authorities to take effect from 1 April 2021. The fees are reviewed annually.

## ENVIRONMENTAL & PORT HEALTH

### 1.3 Local Authority Pollution Prevention & Control (LAPPC)

<b>Environmental Permitting (England &amp; Wales) Regulations 2010 (NAT F)</b>	<b>2021/22</b>	<b>VAT Status</b>
Initial application for authorisation	£1,579.00	OS
Additional fee for operating without a permit	£1,137.00	OS
Reduced fee activities (except Vehicle refinishers)	£148.00	OS
PVR I & II combined	£246.00	OS
Vehicle Refinishers (VRs)	£346.00	OS
Reduced fee activities : additional fee for operating without a permit	£68.00	OS
Where the process comprises mobile crushing and/or screening plant		
First and second application	£1,579.00	OS
Third to seventh application	£943.00	OS
Eighth and subsequent applications	£477.00	OS
Additional fee for an application if any of the above is combined Part B and Waste Application	£297.00	OS

The above fees are set nationally by Central Government. We have no discretion to vary these. The fee period is April 2021 to March 2022, and we expect to be notified of the fees for 2021/22 in April 2021.

# ENVIRONMENTAL & PORT HEALTH

## 1.3 Local Authority Pollution Prevention & Control (LAPPC) (continued)

LAPPC Mobile Plant Charges	2021/22			VAT Status
	Low	Medium	High	
Number of authorisations Sought				
1	£618.00	£989.00	£1,484.00	OS
2	£618.00	£989.00	£1,484.00	OS
3	£368.00	£590.00	£884.00	OS
4	£368.00	£590.00	£884.00	OS
5	£368.00	£590.00	£884.00	OS
6	£368.00	£590.00	£884.00	OS
7	£368.00	£590.00	£884.00	OS
8 and over	£189.00	£302.00	£453.00	OS

Reduced fee activities are; Service Stations, Vehicle Refinishers, dry cleaners and small waste oil burners under 0.4MW.

Newspaper advertisements may be required under EPR at the discretion of the Council as part of the consultation process when considering an application (Chapter 9 of the General Guidance Manual - see link below). This will be undertaken and paid for by the Council and the charging scheme contains a provision for the Council to recover costs.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/211863/env-permitting-general-guidance-a.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf)

Subsistence charges can be paid in four equal installments paid on 1st April, 1st July, 1st October and 1st January. Where fee is paid quarterly there is an additional fee of £36.00.

Annual Subsistence	2021/22			VAT Status
	Low	Medium	High	
Standard process (The additional amounts in brackets must be charged where a permit is for a combined Part B and Waste installation)	£739.00 + (£99.00)	£1,111.00 + (£149.00)	£1,672.00 + (£198.00)	OS
Reduced fee activities	£76.00	£151.00	£227.00	OS
PVR I & II combined	£108.00	£216.00	£326.00	OS
Vehicle Refinishers (VR's)	£218.00	£349.00	£524.00	OS
Where the process comprises mobile crushing and/or screening plant				
First and second application	£618.00	£989.00	£1,484.00	OS
Third to seventh application	£368.00	£590.00	£884.00	OS
Eighth and subsequent applications	£189.00	£302.00	£453.00	OS
Late payment fee	£50.00	£50.00	£50.00	OS

Where a Part B installation is subject to reporting under the E-PRTR Regulation there is an additional fee of £99.00 to the above amounts unless additional fee has already been indicated.

# ENVIRONMENTAL & PORT HEALTH

## 1.3 Local Authority Pollution Prevention & Control (LAPPC) (continued)

<b>Transfer and Surrender</b>	<b>2021/22</b>	<b>VAT Status</b>
Standard process transfer	£162.00	OS
Standard process partial transfer	£476.00	OS
New operator at low risk reduced fee activity	£75.00	OS
Reduced fee activities: partial transfer	£45.00	OS
<b>Temporary transfer for mobiles</b>	<b>2021/22</b>	<b>VAT Status</b>
First transfer	£51.00	OS
Repeat following enforcement or warning	£51.00	OS
<b>Substantial change</b>		
Standard process	£1,005.00	OS
Standard process where the substantial change results in a new PPC activity	£1,579.00	OS
Reduced fee activities	£98.00	OS
<b>Integrated Pollution Prevention Control</b>		
Application	£3,218.00	OS
Additional fee for operating without a licence	£1,137.00	OS
Annual subsistence fee : Low	£1,384.00	OS
Annual subsistence fee : Medium	£1,541.00	OS
Annual subsistence fee : High	£2,233.00	OS
Late payment fee	£50.00	OS
Substantial variation	£1,309.00	OS
Transfer	£225.00	OS
Partial transfer	£668.00	OS
Surrender	£668.00	OS

# ENVIRONMENTAL & PORT HEALTH

## 1.4 Private Water Supplies Regulations 2016 Sampling

To carry out a risk assessment under Regulation 6 of The Private Water Supplies Regulations 2016.

Per assessment (maximum fee)	Statutory Maximum Fee Chargeable	Typical fees 2021/22	VAT Status
Commercial premises	£500.00	£278.00	OS
Domestic premises (split between the number of properties on the supply)	£500.00	£165.00	OS
Sampling of a private water supply:			
Investigation of a non compliance of a non supply	£100.00	£52.00	OS
Analysing a sample of water under Regulation 10*	n/a	£52.00	OS
Analysing a sample of water taken during check monitoring*	n/a	£52.00	OS
Analysing a sample of water taken during audit monitoring*	n/a	£52.00	OS

\* plus the full cost analysis of the samples taken will be added to this (i.e. Sampling fees and Parameter fees charged at cost.)

The above charges listed as Statutory Maximum Fee Chargeable does not reflect the typical cost. Therefore the 2021/22 column reflects the typical cost which is dependant on the complexity of the assessment and is held at the discretion of East Suffolk Council.

## ENVIRONMENTAL & PORT HEALTH

### 1.5 Scrap metal dealers (Scrap Metal Dealers Act 2013)

Site Licence	2021/22	VAT Status
Assessment for a new licence	£407.00	OS
Assessment for variation of a licence	£166.00	OS
Assessment for a renewal	£312.00	OS
<b>Collectors Licence</b>		
Assessment for a new licence	£236.00	OS
Assessment for variation of a licence	£91.00	OS
Assessment for a renewal	£200.00	OS



## LEGAL & DEMOCRATIC SERVICES

### 2.1 Charges for licences

The Licensing Act 2003 governs a limited range of activities. These are the sale by retail of alcohol, the supply of alcohol in qualifying members clubs, the provision of regulated entertainment and the provision of late night refreshment between 11pm - 5am.

Any person making an application or giving a notice under the 2003 Act will be required to pay the fees and charges set by government. These fees are intended only to cover the cost of licensing authorities processing the Act.

#### Premises Licences / Club Premises Certificates

The fee bands in respect of applications for the below are based on the non-domestic rateable value of the premises.

		2021/22		
Non-domestic Rateable Value		Initial Fee	Annual Charge	VAT Status
Village Halls, Church Halls and premises of a similar nature licensed only for the provision of regulated entertainment		No Charge	No Charge	OS
Band A	£0 - £4,300	£100.00	£70.00	OS
Band B	£4,301 - £33,000	£190.00	£180.00	OS
Band C	£33,000 - £87,000	£315.00	£295.00	OS
Band D	£87,001 - £125,000	£450.00	£320.00	OS
Band E	£125,001 and over	£635.00	£350.00	OS

## LEGAL & DEMOCRATIC SERVICES

### 2.1 Charges for licences (continued)

License fee	2021/22	VAT Status
Personal Licences	£37.00	OS
Temporary Event Notices	£21.00	OS

#### Exceptionally Large Events

Where it is proposed that the number of people at any one time attending such an event, an additional fee may be charged.

Where a permanent premises licence is obtained for a site rather than one which is time limited for the event, the annual fee will require an additional charge at a rate of 50% of the additional fee.

Number of attendees	Additional Application Fee	Additional Annual Fee	VAT Status
5,000 - 9,999	£1,000.00	£500.00	OS
10,000-14,999	£2,000.00	£1,000.00	OS
15,000-19,999	£4,000.00	£2,000.00	OS
20,000-29,999	£8,000.00	£4,000.00	OS
30,000-39,999	£16,000.00	£8,000.00	OS
40,000-49,999	£24,000.00	£12,000.00	OS
50,000-59,999	£32,000.00	£16,000.00	OS
60,000-69,999	£40,000.00	£20,000.00	OS
70,000-79,999	£48,000.00	£24,000.00	OS
80,000-89,999	£56,000.00	£28,000.00	OS
90,000 and over	£64,000.00	£32,000.00	OS

## LEGAL & DEMOCRATIC SERVICES

### 2.1 Charges for licences (continued)

Other	2021/22	VAT Status
Supply of copy information contained in register	£5.00	OS
Various notifications (change of address / copies of licence etc.)	£10.50	OS
Notice of interest in any premises	£21.00	OS
Application to vary or specify individual as premises supervisor	£23.00	OS
Interim authority notice	£23.00	OS
Application to transfer premises licence	£23.00	OS

Small societies lotteries	2021/22	VAT Status
Initial registration fee	£40.00	OS
Renewal (annually)	£20.00	OS

Permits	2021/22				VAT Status
	Licensed Premises Gaming	Club Gaming / Club	Family	Gaming	
Grant	£150.00	£200.00	£300.00	£300.00	OS
Grant (club premises certificate holder)	-	£100.00	-	-	OS
Existing operator grant	£100.00	£100.00	£100.00	£100.00	OS
Variation	£100.00	£100.00	-	-	OS
Renewal	-	£200.00	£300.00	£300.00	OS
Renewal (club premises certificate holder)	-	£100.00	-	-	OS
Annual fee	£50.00	£50.00	-	-	OS
Copy of permit	£15.00	£15.00	£15.00	£15.00	OS
Transfer	£25.00	-	-	-	OS
Change of name	£25.00	-	£25.00	£25.00	OS
Notification of 2 machines	£50.00	-	-	-	OS

## LEGAL & DEMOCRATIC SERVICES

### 2.2 Sale of electoral roll

	2021/22	VAT Status
Per 1000 names (data)	£1.50 + (£20.00 per order)	OS
Per 1000 names (printed)	£5.00 + (£10.00 per order)	OS

## PLANNING & COASTAL MANAGEMENT

### 3.1 Ordnance Survey Extracts

Sale of publications for Building Control and Planning.

	2021/22	VAT Status
Copies of official documents (e.g. Planning and Building Regulations decision notice)	£10.50	S

		2021/22		VAT Status
Latitude Global Maps		Urban Maps	Rural Maps	
A4	1:500	£21.00	£21.00	ZE
A4	1:1250	£36.50	£28.00	ZE
A4	1:2500	£81.00	£36.50	ZE
A3	1:500	£28.00	£28.00	ZE
A3	1:1250	£83.00	£34.00	ZE
A3	1:2500	£135.00	£57.00	ZE
The above charges are for one set of maps - six copies in a set				

	2021/22	VAT Status
Bundle of A4 maps (e.g. a 1:1500 and a 1:1250 together)	£45.50	ZE
Bundle of A4 urban maps (e.g. a 1:1500 and a 1:1250)	£51.50	ZE

### 3.2 SEAL Grant

	2021/22	VAT Status
Solar water heating systems installed under a SEAL grant by a SEAL approved installer	£67.50	S

## PLANNING & COASTAL MANAGEMENT

### 3.3 Provision of Supplementary Information

	2021/22	VAT Status
Planning	£67.50	S
Building Control	£67.50	S

### 3.4 Section 106 monitoring Fees (Town & County Planning Act 1990)

	2021/22	VAT Status
Major Obligation (e.g. Open Space, Affordable housing and Education)	£330.00	OS
Minor Obligation (e.g. Small financial obligation due for payment at the same time as a major obligation)	£55.00	OS
Section 111 upfront payment (generally Open Space contributions)	£165.00	OS

## PLANNING & COASTAL MANAGEMENT

### 3.5 Planning Applications

Town & Country Planning (Fees for Applications and Deemed Applications, Requests and Site Visits) (England) Regulations 2012 and Town & Country Planning (Fees for Applications and Deemed Applications, Requests and Site Visits) (England) Regulations 2013. Fees were last increased in January 2018.

See separate list for charges for Pre Application Planning Advice:

[https://ecab.planningportal.co.uk/uploads/english\\_application\\_fees.pdf](https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf)

	2021/22	VAT Status
The site area does not exceed 2.5 hectares (per 0.1 hectare)	£462.00	OS
The site area exceeds 2.5 hectares (maximum total £150,000.00)	£11,432.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
Where the number of dwellings to be created by the development is 50 dwellings or fewer (per dwelling)	£462.00	OS
Where the number of dwellings to be created by the development exceeds 50 dwellings (maximum total £300,000.00)	£22,859.00	OS
Additional charge for each dwelling in excess	£138.00	OS
The site area does not exceed 2.5 hectares (per 0.1 hectare)	£462.00	OS
The site area exceeds 2.5 hectares (maximum total £150,000.00)	£11,432.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
Where no floor space is to be created	£234.00	OS
Where the area of gross floor space does not exceed 40 sqm	£234.00	OS
Where the area of gross floor space is within 40 - 75 sqm	£462.00	OS
Where the area of gross floor space is within 75 - 3750 sqm (per 75 sqm)	£462.00	OS
Where the area of gross floor space exceeds 3750 sqm (maximum total £300,000.00)	£22,859.00	OS
Additional charge for each 75 sqm in excess	£138.00	OS

## PLANNING & COASTAL MANAGEMENT

### 3.5 Planning Applications (continued)

<b>Operations - The erection on land and of buildings used for the purposes of agriculture (other than buildings within cat. 4)</b>	<b>2021/22</b>	<b>VAT Status</b>
The site area does not exceed 2.5 hectares (per 0.1 hectare)	£462.00	OS
The site area exceeds 2.5 hectares (maximum total £150,000.00)	£11,432.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
Where the area of the gross floor space does not exceed 465 sqm	£96.00	OS
Where the area of the gross floor space is within 465 - 540 sqm	£462.00	OS
Where the area of the gross floor space is within 540 - 4215 sqm (per 75 sqm)	£462.00	OS
Where the area of the gross floor space exceeds 4215 sqm (maximum total £300,000.00)	£22,859.00	OS
Additional charge for each 75 sqm in excess	£138.00	OS
<b>The erection of glasshouses on land used for the purposes of agriculture</b>		
Where the gross floor space does not exceed 465 sqm	£96.00	OS
Where the gross floor space exceeds 465 sqm	£2,580.00	OS
<b>The erection, alternation or replacement of plant or machinery</b>		
Where the site area does not exceed 5 hectares (per 0.1 hectare)	£462.00	OS
Where the site area exceeds 5 hectares (maximum total of £300,000.00)	£22,859.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS



## PLANNING & COASTAL MANAGEMENT

### 3.5 Planning applications (continued)

<b>The enlargement, improvement or other alteration of existing dwellings</b>	<b>2021/22</b>	<b>VAT Status</b>
Where the application relates to one dwelling	£206.00	OS
Where the application relates to two or more dwellings	£407.00	OS
The carrying out of operations (including the erection of a building) within the curtilage of an existing dwelling, for purposes ancillary to the enjoyment of the dwelling as such, or the erection or construction of gates, fences, walls or other means of enclosure along a boundary of the curtilage of an existing dwelling	£206.00	OS
The construction of car parks, service roads and other means of access on land used for the purposes of a single undertaking, where the development is required for a purpose incidental to the existing use of land	£234.00	OS
<b>Carrying out any operations connected with the exploratory drilling for oil / natural gas</b>		
Where the site area does not exceed 7.5 hectares (per 0.1 hectare)	£462.00	OS
Where the site area exceeds 7.5 hectares (maximum total of £300,000.00)	£28,750.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
<b>Carrying out any operations not coming within any of the above categories</b>		
Where the site area does not exceed 15 hectares (per 0.1 hectare)	£234.00	OS
Where the site area exceeds 15 hectares (maximum total of £78,000.00)	£34,934.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
In any other case (each 0.1 hectare of the site area - maximum total)	£2,028.00	OS

## PLANNING & COASTAL MANAGEMENT

### 3.5 Planning applications (continued)

<b>The change of use of building to use as one or more separate dwellings</b>	<b>2021/22</b>	<b>VAT Status</b>
Where the change of use is from a single to two dwellings (up to 50 changed dwellings)	£462.00	OS
Where the change of use is for two or more dwellings (in excess of 50 changed dwellings - maximum total of £300,000.00)	£22,859.00	OS
Additional charge for each dwelling in excess	£138.00	OS
In other cases (change of use fewer than 50 dwellings - each)	£462.00	OS
In other cases (change of use is more than 50 dwellings - maximum total of £300,000.00)	£22,859.00	OS
Additional charge for each dwelling in excess	£138.00	OS
<b>The use of the land for the disposal of refuse or waste materials or for the deposit of material remaining after minerals have been extracted from land</b>		
Where the site area does not exceed 15 hectares (per 0.1 hectare)	£234.00	OS
Where the site area exceeds 15 hectares (maximum total of £78,000.00)	£34,934.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
<b>The use of the land for the storage of minerals in the open</b>		
Where the site area does not exceed 15 hectares (per 0.1 hectare)	£234.00	OS
Where the site area exceeds 15 hectares (maximum total of £78,000.00)	£34,934.00	OS
Additional charge for each 0.1 hectare in excess	£138.00	OS
The making of material change in the use of a building or land (other than the material change of use in the change of use of building to use as one or more separate dwellings and the use of land for the disposal of refuse or waste materials or for the deposit of material remaining after materials have been extracted from land)	£462.00	OS

## PLANNING & COASTAL MANAGEMENT

### 3.6 Advertisement Applications

Advertisements displayed on business premises, the forecourt of business premises or other land within the curtilage.

	2021/22	VAT Status
The nature of the business or other activity carried out on the premises	£132.00	OS
The goods sold or the services provided on the premises	£132.00	OS
The name and qualifications of the person carrying on such business or activity or supplying such goods or services	£132.00	OS
Any other advertisements	£462.00	OS

### 3.7 Discharge of Conditions

	2021/22	VAT Status
For 'householder' applications	£34.00	OS
For other applications	£116.00	OS

### 3.8 Extended Time Limits for Implementing Existing Planning Permissions

	2021/22	VAT Status
For 'householder' applications	£68.00	OS
Application for major development	£690.00	OS
For other applications	£234.00	OS

## PLANNING & COASTAL MANAGEMENT

### 3.9 Non Material Amendments Following Grant of Planning Permission

	2021/22	VAT Status
For 'householder' applications	£34.00	OS
For other applications	£234.00	OS
Applications for reserved matters:		
- Same applicants earlier RM application under the same outline approval have incurred total fees equalling that of a full application of the entire scheme	£462.00	OS
Applications for two or more alternative proposals:		
- The highest individual charge applicable if applied for separately plus 50% of the total of the other applications as they have been applied for separately	£462.00	OS
Applications by club/organisation unestablished for profit who provides sport / recreation facilities:		
- Material change of use for playing field for carrying out of operations (other than erecting buildings containing floor space) for proposals ancillary to use of land as a playing field	£462.00	OS

## PLANNING & COASTAL MANAGEMENT

### 3.10 Planning Submissions

<b>Approval and variation of condition</b>	<b>2021/22</b>	<b>VAT Status</b>
Application for removal / variation of a condition following grant of planning permission	£234.00	OS
<b>Certificates of lawfulness (the use is in relation to one or more separate dwellings)</b>		
For 50 or less dwellings (per dwelling)	£462.00	OS
For 50 or more dwellings (maximum total of £300,000.00)	£22,859.00	OS
Additional charge for each dwelling in excess	£234.00	OS
Existing use or operation in breach of a planning condition	£234.00	OS
Certificate of alternative development	£234.00	OS
<b>Prior Notification applications</b>		
Agriculture of forestry developments	£96.00	OS
Demolition	£96.00	OS
Material change of use under Schedule 2 part 3 of the GDPO 1995	£96.00	OS
Changes of use from shops / financial / professional services / agricultural buildings to dwellings with associated building	£206.00	OS
Telecommunication notifications	£462.00	OS
Submission of a hedgerow removal notice or notification for works to trees in conservation area or tree preservation	No Charge	OS
Application for listed building consent	No Charge	OS
Relevant demolition - The demolition of an unlisted building in a conservation area	No Charge	OS

### 3.11 Prior Approvals

Determines as to whether prior approval is required.

	2021/22	VAT Status
Radio masts, equipment housing and public call boxes	£95.00	OS
Agricultural and forestry developments	£95.00	OS
Demolition of buildings	£95.00	OS

## INTERNAL AUDIT

### 4.1 Access to personal files

	2021/22	VAT Status
Data Protection Act 1998 / General Data Protection Regulations	No charge	OS
Housing Regulations 1989	No charge	OS



## CABINET

Tuesday, 5 January 2021

## COUNCIL TAX BASE 2021/22

### EXECUTIVE SUMMARY

1. East Suffolk Council is required to approve its council tax base before 31 January 2021 so that the information can be provided to Suffolk County Council and Suffolk Police and Crime Commissioner for their budget processes. It also enables each Town and Parish Council to set their respective precepts.
2. The tax base for the area is the estimated number of chargeable dwellings expressed as a number of band D equivalents, adjusted for an estimated number of discounts, exemptions and appeals plus an allowance for non-collection.
3. The tax base for the current year amounts to 87,888.87 Band D equivalents. The estimated tax base for 2021/22 that this report seeks approval for amounts to 87,339.43 Band D equivalents, a reduction of 549.44, or around 0.63%. In normal circumstances, the tax base would be expected to increase by around 1% per year. The Covid-19 pandemic and its economic impacts have resulted in more cautious estimates being made than normal regarding the value of Local Council Tax Reduction Scheme (LCTRS) reliefs and the allowance for non-collection.
4. A reduction in the council tax base has financial implications for precepting authorities as their income from a given level of Band D council tax is reduced. The financial implications of the reduction are outlined in the report. As far as town and parish councils are concerned, the fact that growth in the number of properties and LCTRS reliefs are not evenly spread across the district means that some parishes have seen increases in their tax base, whilst others have seen decreases greater than the overall reduction of 0.63%.
5. In the one-year Spending Review announced on 25 November 2020, £670m additional grant funding was announced to provide support in recognition of the increased costs of providing local council tax support. Further details were announced in the Provisional Local Government Finance Settlement of this Local Council Tax Support Grant to authorities in respect of the impact on council tax bases arising from increased LCTRS reliefs. Section 3 of this report provides more details and outlines a proposed scheme to provide an element of this funding to assist town and parish councils in respect of their precept and council tax requirements



Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All wards in East Suffolk
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<b>Cabinet Member:</b>	Councillor Maurice Cook Cabinet Member with responsibility for Resources
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<b>Supporting Officer:</b>	Brian Mew Chief Finance Officer and Section 151 Officer 01394 444571 <a href="mailto:Brian.Mew@eastsuffolk.gov.uk">Brian.Mew@eastsuffolk.gov.uk</a>
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## **1 INTRODUCTION**

- 1.1 The council tax base is the total taxable value at a point in time of all the domestic properties in the council's area. It is an annual calculation and represents the estimated number of chargeable dwellings after allowing for exemptions and discounts, reliefs, projected changes in the property base and after applying an estimated collection rate.
- 1.2 The total taxable value referred to above is arrived at by each dwelling being placed in one of eight valuation bands (A – H) by the Valuation Office, with a statutorily set fraction then being applied in order to convert it to a 'band D equivalent' figure. These band D equivalent numbers are then aggregated at a district wide level and are also sub totalled for parishes. This calculation has to be done by the council responsible for sending the bills out and collecting the council tax ('the billing authority'). In two tier areas, district councils fulfil this function.
- 1.3 The council tax base is used in the calculation of council tax. Each authority divides the total council tax income it needs to meet its budget requirement by the tax base of its area to arrive at its band D council tax. The same fractions referred to in the previous paragraph are then used to work out the council tax for properties in each of the other bands.
- 1.4 The tax base for central government purposes is calculated as at 5 October 2020 as an extract from the council tax system. This information is submitted to the Ministry for Housing, Communities, and Local Government (MHCLG) on the Council Tax Base 1 (CTB1) return. This unadjusted tax base forms part of the basis for funding and allocation assumptions in the local government finance system, such as Revenue Support Grant and New Homes Bonus (NHB) allocations
- 1.5 Calculation of the tax base for council tax setting purposes uses an updated CTB1 report at parish level and band D equivalents are adjusted to reflect changes as result of any technical/LCTRS changes, forecast LCTRS reliefs, projected changes in the property base and predicted collection rates.

## **2 CALCULATION OF THE COUNCIL TAX BASE FOR TAX SETTING PURPOSES**

- 2.1 The CTB1 report shows the analysis of properties across the eight valuation bands for the following classifications of liability:
- properties attracting 100 per cent liability
  - properties attracting a premium, such as second homes
  - properties with an entitlement to a discount of 25, 50 or 100 per cent, such as disabled relief and single person discounts
  - properties that are exempt
  - LCTRS discounts.
- 2.2 Elements of the CTB1 return sent to MHCLG relating to the total physical number of properties and the number of empty properties are currently directly used in the calculation of NHB allocations.

- 2.3 An updated CTB1 report at parish level as at 30 November 2020 has then been reviewed and revised in respect of the following forecasts and assumptions to produce the council tax base for tax setting purposes.
- 2.4 **Changes in the property base** - Potential growth in the property base during 2021/22 based on assumed completions from sites within the local plan that are under construction.
- 2.5 **Forecast level of LCTRS reliefs** - As a result of the economic impacts of the Covid-19 pandemic, the value of LCTRS reliefs has risen significantly. As at the end of November, the value of working age LCTRS reliefs for the year to date was around 14% higher than budgeted. As the furlough scheme unwinds, this trend is expected to continue, and it has been assumed that a similar increase in LCTRS reliefs will be seen in 2021/22, concentrated in the larger towns and parishes of the district.
- 2.6 Collection rate – Council tax collection in the district has typically been at a very high level, and over the years the collection rate used in the tax base calculation has been increased to 99%. However, the Covid-19 pandemic has impacted on collection rates. In addition, there are concerns about the possible collection rate in 2021/22 in respect of LCTRS working age claimants. In 2020/21 the element of the council tax that these claimants are required to pay has been supported by the Government’s Council Tax Hardship Fund (up to a maximum of £150). These arrangements are not being extended in 2021/22. Taking these issues into account, the collection rate used in the tax base calculation has been revised downwards to 98.75%.
- 2.7 **Appendix A** shows the estimated 2021/22 council tax base for the district of **87,339.43 Band D equivalents** by parish. This Appendix also shows the increase or decrease in the tax base by parish compared with 2020/21.
- 2.8 Overall, the tax base for the district shows a reduction of 549.44, or around 0.63%, on the tax base for the current year of 87.888.87 Band equivalents. The reasons for this reduction are briefly summarised in the table below.

Summary of changes	Band D
Net growth in properties 2020/21	634.02
Increased LCTRS Reliefs	-939.26
Less growth in properties than estimated in 2020/21	-59.90
Reduction in Collection Rate	-216.90
Ministry of Defence properties	32.60
<b>Net change in Band D properties</b>	<b>-549.44</b>

### 3 LOCAL COUNCIL TAX SUPPORT GRANT FUNDING

- 3.1 In the one-year Spending Review announced on 25 November 2020, £670m additional grant funding was announced to provide support to authorities in respect of the impact on council tax bases arising from increased LCTRS reliefs. This funding has subsequently been confirmed in the Provisional Local Government Finance Settlement. Major precepting authorities will receive a Local Council tax Support Grant allocation proportionate to their share of the council tax bill in the district, based on the increase in the value of LCTRS reliefs in the year between

the October 2019 CTB1 and October 2020 CTB1 returns, together with an allowance for forecast increases at a national level.

- 3.2 Under these arrangements this grant is being paid to all precepting authorities to compensate for the effects of reductions in the council tax base due to increased LCTRS reliefs. The major precepting authorities will receive a total of £2.748m in grant relating to the East Suffolk area in 2021/22 as follows: Suffolk County Council £2.040m; Suffolk Police and Crime Commissioner £0.338m; and East Suffolk Council £0.370m. As a billing authority, the East Suffolk Council grant includes an element relating to the reduction in tax bases experienced at town and parish level. Based on the share of the overall average council tax bill, this element is estimated to amount to around £110k. This grant is unringfenced and its use is discretionary, including whether or not to pass on an element to town and parish councils to provide support to their budgets and potentially reduce the levels of their precepts and parish council taxes.
- 3.3 A scheme has been developed to pass on £110k of this grant to East Suffolk's town and parish councils to compensate them for the Covid-19 related tax base reductions referred to in this report. The methodology adopted to determine these allocations has been as follows:
- Assess the impact of working age LCTRS reliefs on the parish tax base, expressed as Band D equivalents, where working age LCTRS reliefs have actually decreased that element of the calculation has been set as nil;
  - Assess the impact of the reduced collection rate on the parish tax base, expressed as Band D equivalents;
  - Apply these two values of Band D equivalents to the parish precept for 2020/21 to indicate the impact of these tax base reductions on income at the 2020/21 level;
  - Allocate £110k to parishes pro rata to these reductions to produce a grant allocation for the parish, having set a de minimis grant level of £10 per parish.
- 3.4 These proposed grant allocations are set out in Appendix B. It is proposed that all these grant payments be made as single payments at the same time as the end of April precept payments.

#### **4 HOW DOES THIS RELATE TO THE EAST SUFFOLK STRATEGIC PLAN?**

- 4.1 The vision of the East Suffolk Strategic Plan is to “deliver the highest quality of life possible for everyone who lives in, works in and visits East Suffolk”. Council tax is one of the council's key income streams and directly contributes to the Financial Sustainability theme, and calculation of the council tax base underpins that income stream and provides the basis for tax setting.

#### **5 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 5.1 A reduction in the council tax base has financial implications for precepting authorities as their income from a given level of Band D council tax is reduced. At the 2020/21 council tax levels, a reduction in the tax base of 549.44 Band D equivalents results in reductions in council tax income of: Suffolk County Council £738k; Suffolk Police and Crime Commissioner £122k; and East Suffolk Council £94k. For East Suffolk Council, the reduction compared to the tax base forecast included in the MTFS in February 2020 amounts to £245k.
- 5.2 Although the position on LCTRS reliefs for next year is uncertain, at current estimated levels the Council Tax Support allocations should negate these impacts.
- 5.3 For town and parish councils, a reduction in the tax base means that if the parish kept its precept the same as last year, it would still see an increase in the parish element of the

council tax. However, the fact that growth in the number of properties and LCTRS reliefs are not evenly spread across the district means that some parishes have seen increases in their tax base, whilst others have seen decreases greater than the overall reduction of 0.63%. The Council Tax Support scheme proposed in this report will mitigate the impacts of the Covid-19 pandemic on the parish tax base to a large extent, enabling parishes to consider their precepts and parish council taxes in the knowledge that they will be receiving a grant.

## **6 OTHER KEY ISSUES**

- 6.1 An Equality Impact Assessment is not applicable to calculation of the council tax base, which is a statutory requirement. An Equality Impact Assessment has been prepared in respect of the Council Tax Support scheme to towns and parishes proposed in this report.

## **7 CONSULTATION**

- 7.1 Although there is no formal requirement to consult on setting of the council tax base, given the potential financial impact of the Covid-19 pandemic on council tax, council officers have been in constant touch with the major precepting authorities over course of this year, Briefings on the implications for town councils have also been held at the quarterly meetings with town clerks. All towns and parishes were written to in October with an indication of the forecast tax base at that time, to inform them of the potential implications for their own precepts and tax levels. Towns and parishes will be written to after the council tax base is approved, informing them of their individual tax base, requesting their precepts for 2021/22, and informing of their Council Tax Support grants should these be approved by Cabinet.

## **8 OTHER OPTIONS CONSIDERED**

- 8.1 The Local Authorities (Calculation of Council Tax Base) Regulations 1992 sets out the requirements for the calculation of the council tax base for tax setting purposes, and there are consequently no alternative options to consider.
- 8.2 The Council could consider not passing on an element of Council Tax Support funding to towns and parishes. However, the proposed option represents a valuable opportunity to financially support towns and parishes and their council tax payers in respect of the impacts of the Covid-19 pandemic.

## **9 REASON FOR RECOMMENDATION**

- 9.1 To approve a council tax base for the purposes of tax setting as required by the Local Authorities (Calculation of Council Tax Base) Regulations 1992.
- 9.2 To approve a scheme for passing on an element of Local Council Tax Support Grant to Town and Parish Councils.

## **RECOMMENDATIONS**

That Cabinet approve

1. That the council tax base for 2021/22 for the East Suffolk district is 87,339.43 Band D equivalent properties.
2. The council tax bases for 2021/22 for individual town and parish areas as shown in Appendix A.
3. The Local Council Tax Support Grant allocations to Town and Parish Councils detailed in Appendix B.

## **APPENDICES**

<b>Appendix A</b>	East Suffolk Council Tax Base 2021/22 by Town and Parish area
<b>Appendix B</b>	Proposed Local Council Tax Support Grant allocations to Town and Parish Councils

## **BACKGROUND PAPERS – None**

## Council Tax Base by Parish (Band D Equivalent)

ES/0614

Parish	2020/21	2021/22	Difference
Aldeburgh	1,883.62	1,870.40	-13.22
Alderton	174.22	176.58	2.36
Aldringham-Cum-Thorpe	575.43	575.22	-0.21
All Saints & St. Nicholas, St. Michael and St. Peter S E	102.49	102.45	-0.04
Badingham	224.14	230.16	6.02
Barnby	217.09	215.66	-1.43
Barsham and Shipmeadow	129.08	131.00	1.92
Bawdsey	188.02	193.25	5.23
Beccles	3,206.36	3,160.88	-45.48
Benacre	33.97	32.68	-1.29
Benhall & Sternfield	290.55	299.47	8.92
Blaxhall	112.44	109.38	-3.06
Blundeston and Flixton	456.35	454.71	-1.64
Blyford and Sotherton	71.01	70.50	-0.51
Blythburgh	191.21	192.52	1.31
Boulge	14.85	14.10	-0.75
Boyton	59.66	58.47	-1.19
Bramfield & Thorington	191.03	192.37	1.34
Brampton with Stoven	148.52	150.86	2.34
Brandeston	146.11	142.59	-3.52
Bredfield	147.28	146.41	-0.87
Brightwell, Foxhall & Purdis Farm	985.21	989.89	4.68
Bromeswell	154.82	155.32	0.50
Bruisyard	66.12	69.28	3.16
Bucklesham	200.74	198.39	-2.35
Bungay	1,631.58	1,613.60	-17.98
Burgh	79.37	79.56	0.19
Butley, Capel St Andrew & Wantisden	113.32	113.18	-0.14
Campsea Ashe	155.05	154.71	-0.34
Carlton Colville	2,657.67	2,609.02	-48.65
Charsfield	145.84	143.75	-2.09
Chediston, Linstead Magna & Linstead Parva	158.06	158.74	0.68
Chillesford	63.35	69.08	5.73
Clopton	145.80	144.55	-1.25
Cookley & Walpole	153.33	153.27	-0.06
Corton	567.16	567.40	0.24
Covehithe	10.84	12.87	2.03
Cransford	67.42	67.21	-0.21
Cratfield	148.76	144.37	-4.39
Cretingham, Hoo & Monewden	207.77	207.40	-0.37
Dallinghoo	84.77	83.38	-1.39

Darsham	181.67	191.85	10.18
Debach	32.01	32.14	0.13
Dennington	232.70	233.86	1.16
Dunwich	86.20	86.46	0.26
Earl Soham	202.46	201.29	-1.17
Easton	163.04	167.03	3.99
Eyke	154.63	152.13	-2.50
Felixstowe	8,474.25	8,488.90	14.65
Flixton, St. Cross S E & St. Margaret South Elmham	165.31	161.32	-3.99
Framlingham	1,492.68	1,566.80	74.12
Friston	211.74	213.88	2.14
Frostenden, Uggeshall and South Cove	164.76	168.42	3.66
Gisleham	248.05	245.02	-3.03
Great Bealings	132.25	132.40	0.15
Great Glemham	103.37	103.07	-0.30
Grundisburgh & Culpho	634.94	645.89	10.95
Hacheston	159.69	162.58	2.89
Halesworth	1,719.61	1,720.23	0.62
Hasketon	175.12	175.15	0.03
Hemley	25.33	25.71	0.38
Henstead with Hulver Street	139.22	137.33	-1.89
Heveningham	65.50	64.29	-1.21
Hollesley	475.97	483.35	7.38
Holton	308.32	304.80	-3.52
Homersfield	59.30	60.13	0.83
Huntingfield	78.65	76.53	-2.12
Iken	63.31	64.36	1.05
Kelsale-cum-Carlton	406.67	401.44	-5.23
Kesgrave	4,788.23	4,753.56	-34.67
Kessingland	1,427.93	1,392.31	-35.62
Kettleburgh	109.66	108.12	-1.54
Kirton & Falkenham	554.01	552.33	-1.68
Knodishall	315.05	313.61	-1.44
Leiston	1,777.07	1,724.87	-52.20
Letheringham	42.82	38.62	-4.20
Levington & Stratton Hall	125.62	121.51	-4.11
Little Bealings	213.74	209.67	-4.07
Little Glemham	67.14	67.32	0.18
Lound	117.41	115.83	-1.58
Lowestoft	12,682.12	12,371.87	-310.25
Marlesford	87.42	86.40	-1.02
Martlesham	2,296.38	2,296.33	-0.05
Melton	1,822.60	1,860.33	37.73
Mettingham	82.10	80.44	-1.66
Middleton	198.64	202.75	4.11
Mutford	185.31	185.20	-0.11
Nacton	344.26	352.54	8.28



Newbourne	107.22	108.55	1.33
North Cove	149.89	151.89	2.00
Orford & Gedgrave	394.25	398.71	4.46
Otley	288.92	290.45	1.53
Oulton	1,463.43	1,467.88	4.45
Oulton Broad	3,250.37	3,209.24	-41.13
Parham	120.08	119.31	-0.77
Peasenhall	232.77	236.66	3.89
Pettistree	87.15	88.10	0.95
Playford	112.89	111.18	-1.71
Ramsholt	12.77	12.53	-0.24
Redisham	52.13	51.74	-0.39
Rendham	129.57	128.77	-0.80
Rendlesham	939.42	931.93	-7.49
Reydon	1,192.36	1,178.84	-13.52
Ringsfield and Weston	221.44	219.60	-1.84
Rumburgh	119.50	120.46	0.96
Rushmere	33.07	33.17	0.10
Rushmere St Andrew	2,573.67	2,560.78	-12.89
Saxmundham	1,566.89	1,556.39	-10.50
Saxtead	126.06	127.44	1.38
Shadingfield, Sotterley, Willingham and Ellough	180.14	180.25	0.11
Shottisham	84.33	83.77	-0.56
Sibton	94.89	98.18	3.29
Snape	329.04	326.69	-2.35
Somerleyton, Ashby & Herringfleet	164.18	162.49	-1.69
Southwold	1,094.99	1,076.40	-18.59
Spexhall	85.38	84.16	-1.22
St. Andrew Ilketshall	110.89	113.28	2.39
St. James South Elmham	87.83	88.31	0.48
St. John Ilketshall	20.38	20.09	-0.29
St. Lawrence Ilketshall	61.77	59.18	-2.59
St. Margaret Ilketshall	69.38	71.45	2.07
Stratford St Andrew and Farnham	138.50	138.88	0.38
Sudbourne	184.58	182.46	-2.12
Sutton	142.39	143.97	1.58
Sutton Heath	327.25	358.26	31.01
Sweffling	96.45	97.32	0.87
Swilland & Witnesham	398.60	409.31	10.71
Theberton	152.35	148.92	-3.43
Trimley St Martin	731.42	736.40	4.98
Trimley St Mary	1,267.47	1,255.32	-12.15
Tuddenham St Martin	164.05	165.41	1.36
Tunstall	264.01	264.02	0.01
Ubbeston	42.45	42.97	0.52
Ufford	382.86	392.54	9.68
Walberswick	388.72	375.57	-13.15

Waldringfield	249.75	250.35	0.60
Wangford with Henham	249.08	252.05	2.97
Wenhaston with Mells Hamlet	417.09	402.76	-14.33
Westerfield	234.74	236.17	1.43
Westhall	130.45	132.27	1.82
Westleton	308.52	310.14	1.62
Wickham Market	818.13	806.71	-11.42
Wissett	123.66	121.03	-2.63
Woodbridge	3,149.75	3,100.12	-49.63
Worlingham	1,289.04	1,273.64	-15.40
Wrentham	382.53	375.17	-7.36
Yoxford	343.31	345.20	1.89
	87,888.87	87339.43	-549.44

Local Council Tax Support Grant by Parish

PARISH	2021/22
	£
Aldeburgh	1,253
Alderton	16
Aldringham-Cum-Thorpe	37
All Saints & St. Nicholas, St. Michael and St. Peter S E	27
Badingham	47
Barnby	17
Barsham and Shipmeadow	0
Bawdsey	18
Beccles	2,511
Benacre	0
Benhall & Sternfield	36
Blaxhall	92
Blundeston and Flixton	57
Blyford and Sotherton	0
Blythburgh	100
Boulge	0
Boyton	104
Bramfield & Thorington	75
Brampton with Stoven	25
Brandeston	21
Bredfield	12
Brightwell, Foxhall & Purdis Farm	28
Bromeswell	14
Bruisyard	0
Bucklesham	50
Bungay	2,818
Burgh	0
Butley, Capel St Andrew & Wantisden	56
Campsea Ashe	139
Carlton Colville	924
Charsfield	67
Chediston, Linstead Magna & Linstead Parva	41
Chillesford	19
Clopton	61
Cookley & Walpole	46
Corton	27
Covehithe	0
Cransford	0
Cratfield	30
Cretingham, Hoo & Monewden	23
Dallinghoo	0

Darsham	24
Debach	0
Dennington	40
Dunwich	0
Earl Soham	172
Easton	21
Eyke	120
Felixstowe	7,476
Flixton, St. Cross S E & St. Margaret South Elmham	17
Framlingham	2,055
Friston	32
Frostenden, Uggeshall and South Cove	0
Gisleham	0
Great Bealings	18
Great Glemham	84
Grundisburgh & Culpho	46
Hacheston	40
Halesworth	2,195
Hasketon	33
Hemley	0
Henstead with Hulver Street	0
Heveningham	23
Hollesley	259
Holton	121
Homersfield	0
Huntingfield	208
Iken	0
Kelsale-cum-Carlton	214
Kesgrave	2,561
Kessingland	1,883
Kettleburgh	47
Kirton & Falkenham	155
Knodishall	84
Leiston	9,812
Letheringham	0
Levington & Stratton Hall	130
Little Bealings	85
Little Glemham	0
Lound	13
Lowestoft	52,405
Marlesford	65
Martlesham	648
Melton	729
Mettingham	0
Middleton	15
Mutford	51
Nacton	22

Newbourne	17
North Cove	0
Orford & Gedgrave	92
Otley	46
Oulton	291
Oulton Broad	3,416
Parham	49
Peasenhall	105
Pettistree	23
Playford	40
Ramsholt	0
Redisham	0
Rendham	14
Rendlesham	799
Reydon	350
Ringsfield and Weston	87
Rumburgh	11
Rushmere	0
Rushmere St Andrew	745
Saxmundham	3,885
Saxtead	13
Shadingfield, Sotterley, Willingham and Ellough	90
Shottisham	10
Sibton	30
Snape	61
Somerleyton, Ashby & Herringfleet	54
Southwold	482
Spexhall	10
St. Andrew Ilketshall	0
St. James South Elmham	0
St. John Ilketshall	0
St. Lawrence Ilketshall	0
St. Margaret Ilketshall	0
Stratford St Andrew and Farnham	10
Sudbourne	12
Sutton	35
Sutton Heath	18
Sweffling	16
Swilland & Witnesham	33
Theberton	34
Trimley St Martin	362
Trimley St Mary	461
Tuddenham St Martin	14
Tunstall	35
Ubbeston	13
Ufford	131
Walberswick	114

Waldringfield	98
Wangford with Henham	31
Wenhaston with Mells Hamlet	140
Westerfield	29
Westhall	13
Westleton	53
Wickham Market	674
Wissett	18
Woodbridge	5,703
Worlingham	271
Wrentham	292
Yoxford	116
<b>Total</b>	<b>110,140</b>



## CABINET

Tuesday, 5 January 2021

### CAPITAL PROGRAMME FOR 2021/22 TO 2024/25 INCLUDING REVISIONS TO 2020/21

#### EXECUTIVE SUMMARY

1. This report sets out the Council's Capital Programme for the financial years 2021/22 to 2024/25 including revisions to 2020/21.
2. The report includes the main principles applied to set the programme and provides details of the expenditure and financing for 2020/21 and 2021/22 to 2024/25.
3. Total General Fund Capital investment for the period is anticipated to be £189.44m. In addition to the use of its internal resources and both internal and external borrowing, the Council will be benefiting from receiving £103.65m of external grants and contributions.
4. Total Housing Revenue Account capital investment for the period is anticipated to be £64.95m and benefiting from receiving £13.31m of external grants and contributions.
5. Cabinet is asked to consider the Capital Programme for 2021/22 to 2024/25 including revisions to 2020/21 and recommend its approval by Full Council.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All Wards across East Suffolk
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<b>Cabinet Member:</b>	Councillor Maurice Cook Cabinet Member with responsibility for Resources
<b>Supporting Officer:</b>	Brian Mew Interim Chief Finance Officer 01394 444571 <a href="mailto:brian.mew@eastssuffolk.gov.uk">brian.mew@eastssuffolk.gov.uk</a>

## 1 INTRODUCTION

- 1.1 As part of the budget setting process, the Council is required to agree a programme of capital expenditure for the coming four years. The capital programme plays an important part in the delivery of the Council's Medium-Term Financial Strategy (MTFS), which in turn supports wider service delivery.
- 1.2 Capital expenditure within the Council is split into two main components, the General Fund Capital Programme, and the Housing Revenue Account (HRA) Capital Programme.
- 1.3 The capital programme recognises the spending pressures within the Finance Settlement for 2021/22 on the resources available. Therefore, the programme continues to only incorporate those projects that are either a statutory requirement or are essential to the Council's service delivery. The programme includes schemes where the Council has been successful in securing funding from external grants and contributions, and schemes where the Council is pro-actively working with external bodies to secure funding. For these schemes to go ahead it is important that the funding is secured.
- 1.4 The capital programme has been compiled taking account of the following main principles, to:
- maintain an **affordable** four-year rolling capital programme.
  - ensure capital resources are aligned with the Council's **Business Plan**,
  - maximise available resources by actively seeking **external funding** and **disposal of surplus assets**; and
  - not to anticipate **receipts** from disposals **until they are realised**.
- 1.5 The current economic climate also places further emphasis on ensuring that the levels of capital receipts are maximised through improved asset management and through the sale of surplus and underused assets. The Council has previously disposed of land and buildings surplus to its requirements, which have supported the overall financing of capital investment and at the same time reduced the demand on the revenue budget.
- 1.6 Capital Funding Sources - The capital investment proposals contained within this MTFS rely upon an overall funding envelope made up of several sources, including internal borrowing, capital receipts, and capital grant and revenue contributions.
- 1.7 Borrowing - The local Government Act 2003 gave local authorities the ability to borrow for capital expenditure provided that such borrowing was affordable, prudent, and sustainable over the medium term. The Council must complete a range of calculations (Prudential Indicators) as part of its annual budget setting process to evidence this. These make sure that the cost of paying for interest charges and repayment of principal by a minimum revenue payment (MRP) each year is considered when drafting the Budget and Medium-Term Financial Strategy. Over the course of this MTFS, prudential borrowing of £70.25m has been assumed for the General Fund Capital Programme, being £32.03m (internal borrowing) and £38.22m (external borrowing).
- 1.8 Following the change in borrowing rules from the PWLB where Councils can not borrow if their capital programmes contain projects for income generation. The Council will consider long-term loans from other sources including banks, pensions and local authorities, and will investigate the possibility of issuing bonds and similar instruments.
- 1.9 The Council's external borrowing limit is set at £155m with a General Fund limit of £67.74m and actual borrowing of £6.08m. The HRA borrowing limit is set at £87.26m with actual borrowing of £71.17m.



- 1.10 Capital Receipts - These are generated when a non-current asset is sold, and the receipt is more than £10k. Capital receipts can only be used to fund capital expenditure or repay borrowing. In determining the overall affordability of its capital programme, the Council has taken a prudent approach of not including anticipated capital receipts as a source of funding in the programme until such a time when the income is received and realised.
- 1.11 The programme set out in the report is affordable without the need to rely on future capital receipts, the extent and timing of which are unknown. Any receipts not used within the year are transferred into the Capital Receipts Reserve to be used for future capital investment financing.
- 1.12 Capital Grant - The Council receives additional grant funding for a variety of purposes and from a range of sources. These include the Ministry of Housing, Communities and Local Government (MHCLG) funding for Disabled Facility Grants and Environment Agency funding for Coastal Management projects.
- 1.13 Revenue Contributions - Although the Council can use its General Fund to pay for capital expenditure, as it has done in the past (formerly Suffolk Coastal DC and Waveney DC), the current financial constraints that are on the Revenue Budget means that this option is limited in the medium term.
- 1.14 General Fund Capital Reserves - Capital Short Life Asset Reserve – It is anticipated that this reserve will continue to fund assets with a life of less than 10 years, primarily being IT equipment and vehicles purchases.
- 1.15 HRA Right to Buy (RTB) Capital Receipts – The Right to Buy scheme helps eligible council tenants to buy their home with a discount of up to £84,200 (2020/21). The Council receives the sale proceeds of the Council House.
- 1.16 HRA Other Capital Receipts - These are generated when a fixed asset is sold, and the receipt is more than £10k. Capital receipts can only be used to fund capital expenditure.
- 1.17 HRA Contributions – Funding for capital expenditure on housing can be met from within the HRA. The future funding requirements will be informed by the revised 30-year HRA business plan.
- 1.18 HRA Capital Reserves – Although the HRA subsidy system has ceased to exist, transitional arrangements allow the Council to continue to place the Major Repairs Allowance, as detailed in the settlement determination, in the Major Repairs Reserve. This is exclusively available for use on HRA capital expenditure.

## **2 SUMMARY GENERAL FUND CAPITAL PROGRAMME**

- 2.1 Capital expenditure relates to the acquisition of fixed assets or expenditure that adds to (and not merely maintains) the value of an existing fixed asset. The tables in Appendix A show the General Fund budgets for 2020/21 to 2024/25.
- 2.2 The capital programme for 2020/21 through to 2024/25 has a total budget requirement of £189.44m which will be financed through both internal and external resources.
- 2.3 The programme from 2020/21 to 2024/25 benefits from £103.65m (55%) of external grants and contributions, the use of £14.66m (7%) of reserves and internal/external borrowing of £70.25m (37%) and £0.88m (1%) of capital receipt reserves
- 2.4 In the event of external funding not being secured then those projects will look to secure other funding or will not be pursued.

### **3 SUMMARY HRA CAPITAL PROGRAMME**

- 3.1 Capital expenditure relates to the acquisition of fixed assets or expenditure that adds to (and not merely maintains) the value of an existing fixed asset. The tables in Appendix B show the HRA capital budgets for 2020/21 to 2024/25.
- 3.2 The capital programme for 2020/21 through to 2024/25 has a total budget requirement £64.95m which will be financed through both internal and external resources.
- 3.3 The programme from 2020/21 to 2024/25 relies upon £13.31m (21%) of external grants and contributions, the use of £28.14m (43%) of capital reserves and direct revenue financing of £23.50m (36%).

### **4 KEY INVESTMENTS**

#### **4.1 Felixstowe North Regeneration – Garden Neighbourhood (Leisure Centre)**

At East Suffolk Council's Cabinet meeting held on 3 September 2019, it was agreed that a new leisure centre for Felixstowe would be approved bringing a single destination facility to the town, which will service the community and attract people from further afield. The total budget for the project included within the programme is £25m due to be funded from borrowing.

#### **4.2 Felixstowe North Regeneration – Garden Neighbourhood (Infrastructure)**

Development of infrastructure including housing, a school and connectivity (walkways, cycleways etc) between areas and the existing town

#### **4.3 Lowestoft Beach Hut Replacement**

Cliff stabilisation works commenced in 2020 along with works to prepare for the replacement of approximately 50 beach huts. The programme contains both the wall stabilisation (£1.45m) and replacement beach huts (£1m) budgeted cost of £2.45m

#### **4.4 Commercial Investment**

The Council is constantly looking for opportunities to reduce its operational costs and or generate additional income. The Council has developed its Commercial Investment Strategy which is an important part of the Council's approach to delivering financial self-sufficiency. The Strategy sets out the detailed policies, processes, and governance arrangements within which the investment decisions will be made, implemented, managed and monitored. The Council has set aside Capital funds of £10m (£5m Commercial Investment and £5m land acquisition) to deliver the Council's Commercial Investment plans. In 2020/21 two projects have been identified with budget reallocations to the specific projects (£2.25m Moor Business Park and £1.5m NWES).

#### **4.5 Flood Alleviation**

Lowestoft Tidal Wall and Barrier - A major project to construct a permanent tidal wall which will be built around the harbour to protect Lowestoft from future tidal surges, with a tidal gate located near to the Bascule Bridge to prevent surge water entering Lake Lothing. The total budgeted cost of £68.3m has been included in the programme.

#### **4.6 LATCO Loan**

The Council's Investment Strategy permits service loans for which a return on investment is achieved which is usually around 6%. In 2021/22 the Council will be looking to make a maximum investment into the Council's LATCO of £10m for which a full business case will be submitted to Cabinet for approval. The loan will be held as a long-term debtor which will be repaid over time and investment income being received on an annual basis.

#### 4.7 HRA Redevelopment/ New Build Programme

The Housing Revenue Account has several purchased properties that require redevelopment or modernisation to ensure that they are fit for purpose and provide the appropriate type of accommodation for the area. The development programme provides the financial resources to achieve this.

- 4.8 The development of housing provision within the North of the District is paramount to the Housing Revenue Account's business plan and an affordable programme of land purchase and development has been drawn up to deliver the Councils objective.

### 5 THE REVIEW PROCESS

- 5.1 Strategic Directors/Head of Service are required to regularly review service area capital provisions and provide updates where required. Acceleration of a capital project can be made where another project can be deferred in the current financial year and in consultation with the Chief Finance Officer.

### 6 REVENUE IMPLICATIONS

- 6.1 Capital projects have revenue implications, depending on the nature of the projects and how they are financed. The majority of the Council's general fund capital expenditure is financed by prudential borrowing and therefore incurs both an interest charge and a charge for repaying the debt known as the Minimum Revenue Provision (MRP).
- 6.2 For every £100k financed through borrowing there is a revenue cost of £7.5k every year over the life of the asset, which is usually 20 years.
- 6.3 The HRA is funded through direct revenue financing (DRF) and only attracts an interest charge on its loans acquired for the settlement of its share of the Government's Housing debt in 2011/12.
- 6.4 Both these costs must be funded from the Council's General Fund or HRA as appropriate. Consequently, the amount of capital works that can be undertaken are constrained by the ability of the revenue accounts to absorb these charges. The current and forecast charges are shown in the table below.

	2020/21	2021/22	2022/23	2023/24	2024/25
<b>General Fund - Capital Charges</b>	£000	£000	£000	£000	£000
Interest	530	530	530	530	530
Borrowing repayment provision (MRP)	820	1,196	1,627	1,941	2,014
<b>Total</b>	<b>1,350</b>	<b>1,726</b>	<b>2,157</b>	<b>2,471</b>	<b>2,544</b>
<b>HRA - Capital Charges</b>					
Interest	2,000	2,000	2,000	2,000	2,000

### 7 HOW DOES THIS RELATE TO EAST SUFFOLK BUSINESS PLAN?

- 7.1 The Capital Programme feeds directly into the Council's MTFs which in turn is the mechanism by which the key Business Plan objective of Financial Self-Sufficiency will be delivered over the medium term. The Capital Programme also links directly to the Council's specific actions within the Business Plan and provides the capital financing for some of these actions.

## **8 REASON FOR RECOMMENDATION**

- 8.1 Approval of the capital programme for 2020/21 to 2024/25 is required as part of the overall setting of the budget and MTFS.

### **RECOMMENDATIONS**

That the capital programme for 2021/22 to 2024/25 and revisions to 2020/21 be recommended for approval by Full Council.

### **APPENDICES**

<b>Appendix A</b>	General Fund summary and detailed capital investment projects
<b>Appendix B</b>	Housing Revenue Account summary and detailed capital investment projects
<b>Appendix C</b>	Capital Programme External Funding Summary

### **BACKGROUND PAPERS – None**

## APPENDIX A

SUMMARY - GENERAL FUND PROGRAMME	2020/21 £000 Original Budget	2020/21 £000 Revised Budget	2021/22 £000 Original Budget	2022/23 £000 Original Budget	2023/24 £000 Original Budget	2024/25 £000 Original Budget	2020/21 to 2024/25
<b>Capital Expenditure</b>							
Economic Development & Regeneration	0	518	0	0	0	0	518
Environmental Services & Port Health	11	200	150	150	50	50	600
Financial Services, Corporate Performance & Risk Ma	5,000	7,400	200	300	0	0	7,900
ICT Services	400	785	50	50	450	250	1,585
Operations	19,889	9,166	14,244	17,330	17,580	17,880	76,200
Planning & Coastal Management	14,552	8,093	19,367	13,397	18,009	26,774	85,640
Housing Improvement	1,716	1,000	1,500	1,500	1,500	1,500	7,000
Long Term Debtors	0	0	10,000	0	0	0	10,000
<b>Total Capital Expenditure</b>	<b>41,568</b>	<b>27,162</b>	<b>45,511</b>	<b>32,727</b>	<b>37,589</b>	<b>46,454</b>	<b>189,443</b>
<b>Financed By:-</b>							
<b>External:</b>							
Grants	16,940	10,191	19,231	14,847	25,309	34,074	103,652
Contributions	0	0	0	0	0	0	-
Borrowing	1,000	0	3,415	13,800	10,000	11,000	38,215
<b>Internal:</b>							
General Fund Capital Receipts	0	785	100	0	0	0	885
Borrowing	21,422	11,269	18,266	1,200	900	400	32,035
Reserves	2,206	4,917	4,499	2,880	1,380	980	14,656
<b>Total Financing</b>	<b>41,568</b>	<b>27,162</b>	<b>45,511</b>	<b>32,727</b>	<b>37,589</b>	<b>46,454</b>	<b>189,443</b>

### Detailed capital investment projects

Funding Type key:			
EB	External Borrowing	IB	Internal Borrowing
EC	External Contribution	ICR	Internal Capital Receipt
EG	External Grant	IR	Internal Reserve

ECONOMIC DEVELOPMENT & REGENERATION	2020/21 £000 Original Budget	2020/21 £000 Original + Carry Fwd. Budget	2020/21 £000 Revised Budget	2021/22 £000 Revised Budget	2022/23 £000 Revised Budget	2023/24 £000 Revised Budget	2024/25 £000 Revised Budget	New Project Added	Funding Type
Ness Point Regeneration Project	0	336	518	0	0	0	0		EG/ER
<b>Total Budgeted Expenditure</b>	<b>0</b>	<b>336</b>	<b>518</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Financed By:-</b>									
<b>Internal Funding:</b>									
Internal Borrowing	0	0	0	0	0	0	0		IB
Capital Receipt	0	0	0	0	0	0	0		ICR
Reserve	0	0	40	0	0	0	0		IR
	0	0	40	0	0	0	0		
<b>External Funding:</b>									
Grants	0	336	478	0	0	0	0		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	0	336	478	0	0	0	0		
<b>Total Budgeted Financing</b>	<b>0</b>	<b>336</b>	<b>518</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
Ness Point Regeneration Project									
The Lowestoft Ness Regeneration Scheme (East of England Park project) aims to create a visitor destination that celebrates the culture and heritage of its location.									

ENVIRONMENTAL SERVICES & PORT HEALTH	2020/21 £000	2020/21 £000	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	New Project Added	Funding Type
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget		
Port Health IT System	11	11	200	150	150	50	50		IR
<b>Total Budgeted Expenditure</b>	<b>11</b>	<b>11</b>	<b>200</b>	<b>150</b>	<b>150</b>	<b>50</b>	<b>50</b>		
<b>Financed By:-</b>									
<b>Internal Funding:</b>									
Internal Borrowing	0	0	0	0	0	0	0		IB
Capital Receipt	0	0	0	0	0	0	0		ICR
Capital Reserve - Port Health	11	11	200	150	150	50	50		IR
	<b>11</b>	<b>11</b>	<b>200</b>	<b>150</b>	<b>150</b>	<b>50</b>	<b>50</b>		
<b>External Funding:</b>									
Grants	0	0	0	0	0	0	0		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Total Budgeted Financing</b>	<b>11</b>	<b>11</b>	<b>200</b>	<b>150</b>	<b>150</b>	<b>50</b>	<b>50</b>		
<b>Project</b>									
Port Health IT System	Purchase of new server, upgrade switch environment and replace desktop/printer/tablet								

FINANCIAL SERVICES, CORPORATE PERFORMANCE & RISK MANAGEMENT	2020/21 £000	2020/21 £000	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	New Project Added	Funding Type
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget		
House Purchase - Blackstock	0	24	0	0	0	0	0		IR
Commercial Investment	2,500	5,000	150	0	0	0	0	Subject to business case	IB
Commercial Investment - Moor Business Park	0	0	2,250	0	0	0	0		IB
Land Acquisition Leiston	0	300	0	0	0	0	0		IR
Land Acquisition	2,500	5,000	3,500	0	0	0	0	Subject to business case	IB
Land Acquisition - NWES	0	0	1,500	0	0	0	0		IB
Short Term Transit Site	0	0	0	200	300	0	0		IR
<b>Total Budgeted Expenditure</b>	<b>5,000</b>	<b>10,324</b>	<b>7,400</b>	<b>200</b>	<b>300</b>	<b>0</b>	<b>0</b>		
<b>Internal Funding:</b>									
Internal Borrowing	5,000	10,000	7,400	0	0	0	0		IB
Capital Receipt	0	0	0	0	0	0	0		ICR
Reserve	0	324	0	300	300	0	0		IR
	<b>5,000</b>	<b>10,324</b>	<b>7,400</b>	<b>300</b>	<b>300</b>	<b>0</b>	<b>0</b>		
<b>External Funding:</b>									
Grants	0	0	0	0	0	0	0		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Total Budgeted Financing</b>	<b>5,000</b>	<b>10,324</b>	<b>7,400</b>	<b>300</b>	<b>300</b>	<b>0</b>	<b>0</b>		
<b>Project</b>									
House Purchase - Blackstock	Purchase of investment property								
Commercial Investment	Commercial Investment budget to be used for the purchase of properties/land subject to a business case								
Commercial Investment - Moor Business Park	Purchase of industrial unit site in Beccles								
Land Acquisition Leiston*	Purchase of investment property								
Land Acquisition - NWES	Purchase of 2 sites (Lowestoft & Leiston)								
Land Acquisition	Purchase of investment property								
Short Term Transit Site	Evaluation of Short Term Transit Sites								

ICT SERVICES	2020/21 £000	2020/21 £000	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	New Project Added	Funding Type
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget		
Corporate IT Requirements	400	571	608	50	50	450	250		IR
Members Webcasting	0	177	177	0	0	0	0		IR
Riverside Conference Room TV's	0	25	0	0	0	0	0		IR
<b>Total Budgeted Expenditure</b>	<b>400</b>	<b>773</b>	<b>785</b>	<b>50</b>	<b>50</b>	<b>450</b>	<b>250</b>		
<b>Financed By:-</b>									
<b>Internal Funding:</b>									
Internal Borrowing	0	0	0	0	0	0	0		IB
Capital Receipt	0	0	785	0	0	0	0		ICR
Reserve	400	773	0	50	50	450	250		IR
	400	773	785	50	50	450	250		
<b>External Funding:</b>									
Grants	0	0	0	0	0	0	0		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	0	0	0	0	0	0	0		
<b>Total Budgeted Financing</b>	<b>400</b>	<b>773</b>	<b>785</b>	<b>50</b>	<b>50</b>	<b>450</b>	<b>250</b>		
<b>Project</b>									
Corporate IT Requirements	Desktop refresh - installation of new hardware								
Members Webcasting	Installation of webcasting facility for Council meetings								
Riverside Conference Room TV's	Installation of TV screens to conference rooms								

OPERATIONS	2020/21 £000	2020/21 £000	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	New Project Added	Funding Type
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget		
Aldeburgh Shelter	0	0	6	0	0	0	0	New	IR
Bath Tap Chalets, Felixstowe	0	0	0	100	500	0	0	New	IR
Bawdsey Quay	0	57	57	0	0	0	0		IR
Brackenbury Beach Hut replacement Handrailing	0	88	88	0	0	0	0		IR
Bungay LC redevelopment	1,839	913	1,839	0	0	0	0		IB
Cemeteries	0	395	395	0	0	0	0		IB
Cliff House Chalets Felixstowe	0	0	0	10	0	0	0	New	IR
Cliff House, Felixstowe	0	0	0	250	750	0	0	New	IR
Clifflands car park, Felixstowe	0	0	0	100	0	0	0	New	IR
Community Asset transfer fund	0	0	0	125	125	125	125	New	IR
Coronation Sports Ground	0	0	0	45	0	0	0	New	IR
Dellwood Avenue Cricket Pavilion	0	15	0	0	0	0	0		IR
East Point Pavilion	1,500	1,500	750	0	0	0	0		CG
Estates Management	200	307	307	200	200	200	200		IB/IR
Felixstowe Lighting	0	95	95	0	0	0	0		IR
Felixstowe North - Garden Neighbourhood Regeneration Project (Leisure Centre)	10,000	10,761	50	50	10,000	10,000	5,000	Subject to business case	EB
Felixstowe North - Garden Neighbourhood Regeneration Project (Infrastructure)	0	0	0	0	0	0	6,000	Subject to business case	EB
Felixstowe Seafront Gardens Handrailing	0	0	0	15	0	0	0	New	IR
Felixstowe Sea Front Shelters	0	103	103	0	0	0	0		IR
Felixstowe South - seafront work and Martello Cafe	0	1,750	880	560	0	0	0		IR
Felixstowe Sports Hub	900	900	300	0	0	0	0		IR
Fishing Hut Felixstowe	0	0	0	30	0	0	0	New	IR
Footway Lighting Works - Northern (cyclical replacement)	30	64	64	30	30	30	30		IR
Former Deben High School Felixstowe	0	0	600	2,600	0	0	0	New	IB
Leisure Centre Brackenbury	20	40	20	20	0	0	0		IR
Leisure Centre Deben	20	26	26	20	0	0	0		IR
Leisure Centre Leiston	35	80	70	25	0	0	0		IB
Leisure Centre Lowestoft	0	0	820	0	0	0	0		IR
Lowestoft Beach Hut - demolition/wall stabilisation	2,500	2,453	1,453	0	0	0	0		IR
Lowestoft Beach Hut -replacement Beach Huts phase 2	0	0	0	1,000	0	0	0		IB
Lowestoft Beach Hut -replacement Beach Huts phase 3	0	0	0	500	100	0	0	New	IB
Lowestoft Boardwalk	0	0	50	0	0	0	0	New	IR
Lowestoft South Beach Public Conveniences/Changing Facilities	0	200	0	0	0	0	0		IB
Melton Riverside Car Park Lighting	0	40	0	0	0	0	0		IR
New Beach Hut Sites - Felixstowe	500	952	52	900	500	500	0		IB
Newcombe Road Lowestoft	0	0	0	150	2,800	0	0	New - Subject to business case	EB
Northern Car Park Works	220	220	220	0	0	0	0		IB
Orford Road Felixstowe Access Ramp	0	0	0	95	0	0	0	New	IR
Play Areas (District wide)	0	0	0	200	200	200	0	New	IB
Post Office London Road North Lowestoft Redevelopment	300	300	0	1,000	0	0	0		EB/IR
Public Conveniences Programme	0	150	251	1,050	0	0	0		IB
Public Conveniences review - Lowestoft	300	400	0	0	0	0	0		IB
Railway Building - Lowestoft	0	0	0	1,500	0	0	0	New - Subject to business case	EB
Ravine Bridge	0	0	0	320	0	0	0	New	IR
Royal Plain - Crazy Golf enhancement	0	0	0	200	0	0	0		IB
Royal Plain - Fountain enhancement	0	0	0	200	200	0	0		IR
Rushmere St Andrew Church Wall	0	0	0	35	0	0	0	New	IR
Seafront Gardens Beach Hut Development	0	495	5	490	0	0	0		IB
Southwold Caravan Site redevelopment	1,000	1,000	50	1,000	1,000	0	0	Subject to business case	IR/EB
Southwold Harbour - Pump out station	0	0	0	80	0	0	0	New	IR
Southwold Harbour - Visitor Moorings	0	0	0	200	250	0	0	New	IR
Southwold Harbour South Pier	0	0	0	50	150	6,000	6,000		EG
St Marys Church Woodbridge - Wall	0	0	0	150	0	0	0	New	IR
Various pumping stations	0	0	0	300	0	0	0	New	IR
Waveney Norse Grounds Equipment	25	50	50	25	25	25	25		IR
Waveney Norse Vehicles	500	669	550	619	500	500	500		IR
Wickham Market Churchyard Boundary Wall	0	-5	15	0	0	0	0		IR
<b>Total Budgeted Expenditure</b>	<b>19,889</b>	<b>24,018</b>	<b>9,166</b>	<b>14,244</b>	<b>17,330</b>	<b>17,580</b>	<b>17,880</b>		
<b>Internal Funding:</b>									
Internal Borrowing	15,594	17,321	3,789	7,165	1,000	700	200		IB
Capital Receipt	0	0	0	0	0	0	0		ICR
Reserve	1,795	4,197	4,627	3,614	2,380	880	680		IR
	17,389	21,518	8,416	10,779	3,380	1,580	880		
<b>External Funding:</b>									
Grants	1,500	1,500	750	50	150	6,000	6,000		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	1,000	1,000	0	3,415	13,800	10,000	11,000		EB
	2,500	2,500	750	3,465	13,950	16,000	17,000		
<b>Total Budgeted Financing</b>	<b>19,889</b>	<b>24,018</b>	<b>9,166</b>	<b>14,244</b>	<b>17,330</b>	<b>17,580</b>	<b>17,880</b>		



Project	
Aldeburgh Shelter	Refurbishment of shelter. New roof required - end of life. Redecoration and replacement benches.
Bath Tap Chalets, Felixstowe	Structural works and refurbishment
Bawdsey Quay	Sewage system, clearance of car park and signage works
Brackenbury Beach Hut replacement Handrailing	Replacement safety railing along concrete terrace for beach huts.
Bungay LC redevelopment	Redevelopment of Leisure Centre
Cemeteries	£395k for purchase of land to extend cemetery at Leiston. Burial capacity calculated for further 16 years only.
Cliff House Chalets Felixstowe	Upgrade of internal and external staircases
Cliff House, Felixstowe	Development of site
Clifflands car park, Felixstowe	Car Park surface replacement
Community Asset transfer fund	Site investment to enable transfer of assets
Coronation Sports Ground	Demolition of small toilet block and upgrade of electric supply
Dellwood Avenue Cricket Pavilion	Demolition of Pavilion
East Point Pavillion	Potential redevelopment opportunity through refurbishment and partial redevelopment
Estates Management	A planned preventative maintenance list of works required on Council owned properties throughout the district
Felixstowe Lighting	Cyclical replacement of footway lighting
Felixstowe North - Garden Neighbourhood Regeneration Project (Leisure Centre)	Provision of new leisure centre site
Felixstowe North - Garden Neighbourhood Regeneration Project (Infrastructure)	Provision of housing, school and cycle/walkways
Felixstowe Seafront Gardens Handrailing	Installation of handrailing
Felixstowe Sea Front Shelters	Refurbishment of 6 sea front shelters in Felixstowe
Felixstowe South - seafront work and Martello Cafe	Development of South Seafront area and Martello Café Felixstowe
Felixstowe Sports Hub	ESC is working with key sports clubs in Felixstowe including, football, cricket, rugby and hockey in order to provide separate
Fishing Hut Felixstowe	Rebuilding of fishing hut next to Felixstowe Pier that burnt down in 2019
Footway Lighting Works - Northern (cyclical replacement)	Cyclical replacement of footway lighting
Former Deben High School Felixstowe	Purchase and development of former school site
Leisure Centre Brackenbury	Planned preventative maintenance works required to ensure the immediate running of the facility.
Leisure Centre Deben	Planned preventative maintenance works required to ensure the immediate running of the facility.
Leisure Centre Leiston	Leiston is the second of the leisure redevelopment programme. The Leiston redevelopment will bring the 1970's sports
Leisure Centre Lowestoft	Internal works to Leisure Centre
Lowestoft Beach Hut - demolition/wall stabilisation	Demolition of existing structures and stabilisation of the cliff wall
Lowestoft Beach Hut -replacement Beach Huts phase 2	Installation of beach hut shelf and beach huts
Lowestoft Beach Hut -replacement Beach Huts phase 3	Extension of replacement of existing beach huts
Lowestoft Boardwalk	Installation of beach boardwalk
Lowestoft South Beach Public Conveniences/Changing	South Beach Lowestoft upgrade of public conveniences/changing facilities
Melton Riverside Car Park Lighting	Installation of lighting
New Beach Hut Sites	Proposed investment in additional Beach Hut sites
Newcombe Road Lowestoft	Redevelopment of site to provide start up units
Northern Car Park Works	Planned preventative maintenance works
Orford Road Felixstowe Access Ramp	Replacement of disabled access ramp near new café site
Play Areas (District wide)	Upgrade and refurbishment of district wide play areas
Post Office London Road North Lowestoft Redevelopment	Redevelopment of the purchased vacant Post Office site in London Road North.
Public Conveniences Programme	Upgrade and refurbishment of district wide public conveniences
Public Conveniences review - Lowestoft	Enhancement of Gordon Road Public Convenience and review of remaining Public Conveniences in Lowestoft
Railway Building - Lowestoft	Purchase and development of building contained within the Railway site
Ravine Bridge	Structural works and refurbishment works to part owned bridge
Royal Plain - Crazy Golf enhancement	Crazy Golf redevelopment to coincide with East Point Pavilion refurbishment
Royal Plain - Fountain enhancement	Fountain enhancement to coincide with East Point Pavilion refurbishment
Rushmere St Andrew Church Wall	Refurbishment of closed church yard wall
Seafront Gardens Beach Hut Development	Development of Seafront Gardens site for new beach huts
Southwold Caravan Site redevelopment	Refurbishment of existing caravan site
Southwold Harbour - Pump out station	Enhancement of pump out station
Southwold Harbour - Visitor Moorings	Visitor moorings enhancement
Southwold Harbour South Pier	Enhancement of pier
St Marys Church Woodbridge - Wall	Refurbishment of closed church yard wall
Various pumping stations	Replacement and enhancement of pumping stations
Waveney Norse Grounds Equipment	Replacement lawn tractors/mowers
Waveney Norse Vehicles	Purchase of Vehicles for use by Waveney Norse (contractual)
Wickham Market Churchyard Boundary Wall	Replacement of closed churchyard wall

PLANNING & COASTAL MANAGEMENT	2020/21 £000	2020/21 £000	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	New Project Added	Funding Type
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget		
Bawdsey East Lane	10	35	35	0	0	0	0		EG
Coast Protection - Minor Capital Works	828	881	80	601	200	200	200		IB
Corton & North Corton Hybrid Scheme	250	400	100	100	200	7,000	7,000		EG
Lowestoft Flood Risk Management Project Phase 1 (Tidal Walls, Pluvial & Fluvial)	9,472	11,873	6,873	5,000	0	0	0		EG
Lowestoft Flood Risk Management Project Phase 2 (Tidal Gate)	3,902	5,572	820	12,359	7,907	10,809	19,574		EG
Slaughden Coast/Estuary	20	35	35	0	0	0	0		EG
Southwold Harbour Fender	0	0	0	1,100	0	0	0	New	IB/EG/IR
Thorpeness (Externally Funded)	70	70	100	100	3,300	0	0		EG
Pakefield Coastal Resilience project	0	0	50	107	1,790	0	0	New	EG/IR
<b>Total Budgeted Expenditure</b>	<b>14,552</b>	<b>18,866</b>	<b>8,093</b>	<b>19,367</b>	<b>13,397</b>	<b>18,009</b>	<b>26,774</b>		
<b>Internal Funding:</b>									
Internal Borrowing	828	881	80	1,101	200	200	200		IB
Capital Receipt	0	0	0	100	0	0	0		ICR
Reserve	0	0	50	485	0	0	0		IR
	828	881	130	1,686	200	200	200		
<b>External Funding:</b>									
Grants	13,724	17,985	7,963	17,681	13,197	17,809	26,574		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	13,724	17,985	7,963	17,681	13,197	17,809	26,574		
<b>Total Budgeted Financing</b>	<b>14,552</b>	<b>18,866</b>	<b>8,093</b>	<b>19,367</b>	<b>13,397</b>	<b>18,009</b>	<b>26,774</b>		
<b>Project</b>									
Bawdsey East Lane SMP Review	Review of Coastal processes around East Lane and works required for retaining shingle around Holesley bay								
Coast Protection - Minor Capital Works	The Coastal Management Team carries out a comprehensive programme of inspections which highlight when repair and maintenance works need to be carried out. This ensures that the defences are functioning correctly, extends the life of the assets and protects the public from potential hazards.								
Corton & North Corton Hybrid Scheme	This item is for ESC contribution to privately funded works to part remove and part rebuild in rock, defences to the north of Corton Village that were abandoned after failure in line with 2010 Shoreline Management Plan policy, plus allow managed realignment to take place to north of village, creating a new beach								
Lowestoft Flood Risk Management Project Phase 1 & 2	A major project to construct a permanent tidal wall which will be built around the harbour to protect Lowestoft from future tidal surges, with a tidal gate located near to the Bascule Bridge to prevent surge water entering Lake Lothing. Including the interim measure of temporary flood barriers								
Slaughden Coast/Estuary SMP Policy review	Innovative scheme South of Aldeburgh likely to be delivered by a consortium of public and private partners to provide 20 years of resilience to the town and the Alde & Ore Estuary, offering scope for enhanced / new economic benefits and business opportunities.								
Southwold Harbour Fender	Southwold Harbour fender remedial works following damage to the fender which was originally constructed in 1992 as set out in the 3rd November 2020 Cabinet report								
Thorpeness (Externally Funded)	Strengthen the soft bag defences installed here in 2010/12 that were damaged by unusually high erosion pressure in 2013.								
Pakefield Coastal Resilience project	New accelerated project due to rapid increase of coastal erosion.								

GENERAL FUND HOUSING IMPROVEMENT	2020/21 £000	2020/21 £000	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	New Project Added	Funding Type
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Original Budget	Original Budget	Original Budget	Original Budget		
Disabled Facilities Grant	1,716	2,810	1,000	1,500	1,500	1,500	1,500		EG
<b>Total Budgeted Expenditure</b>	<b>1,716</b>	<b>2,810</b>	<b>1,000</b>	<b>1,500</b>	<b>1,500</b>	<b>1,500</b>	<b>1,500</b>		
<b>Financed By :-</b>									
<b>Internal Funding:</b>									
Internal Borrowing	0	0	0	0	0	0	0		IB
Capital Receipt	0	0	0	0	0	0	0		ICR
Reserve	0	0	0	0	0	0	0		IR
	0	0	0	0	0	0	0		
<b>External Funding:</b>									
Grant	1,716	2,810	1,000	1,500	1,500	1,500	1,500		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	1,716	2,810	1,000	1,500	1,500	1,500	1,500		
<b>Total Budgeted Financing</b>	<b>1,716</b>	<b>2,810</b>	<b>1,000</b>	<b>1,500</b>	<b>1,500</b>	<b>1,500</b>	<b>1,500</b>		
<b>Project</b>									
HIA Disabled Facilities Grant works									

GENERAL FUND - LONG TERM DEBTORS	2020/21	2020/21	2020/21	2021/22	2022/23	2023/24	2024/25	New Project Added	Funding Type
	£000	£000	£000	£000	£000	£000	£000		
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Original Budget	Original Budget	Original Budget	Original Budget		
LATCO - Loan funding	0	0	0	10,000	0	0	0		IB
<b>Total Budgeted Expenditure</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10,000</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Financed By :-</b>									
<b>Internal Funding:</b>									
Internal Borrowing	0	0	0	10,000	0	0	0		IB
Capital Receipt	0	0	0	0	0	0	0		ICR
Reserve	0	0	0	0	0	0	0		IR
	0	0	0	10,000	0	0	0		
<b>External Funding:</b>									
Grant	0	0	0	0	0	0	0		EG
Contributions	0	0	0	0	0	0	0		EC
Borrowing	0	0	0	0	0	0	0		EB
	0	0	0	0	0	0	0		
<b>Total Budgeted Financing</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10,000</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Project</b>									
LATCO	Loan to the LATCO for investment purposes								

	2020/21	2020/21	2020/21	2021/22	2022/23	2023/24	2024/25
	£000	£000	£000	£000	£000	£000	£000
	Original Budget	Original + Carry Fwd. Budget	Revised Budget	Original Budget	Original Budget	Original Budget	Original Budget
<b>Total Capital Budget</b>	<b>41,568</b>	<b>57,138</b>	<b>27,162</b>	<b>45,511</b>	<b>32,727</b>	<b>37,589</b>	<b>46,454</b>

## APPENDIX B

SUMMARY – HOUSING PROGRAMME	2020/21	2020/21	2021/22	2022/23	2023/24	2024/25	2020/21
	£000	£000	£000	£000	£000	£000	to
	Original	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Total
<b>Capital Expenditure</b>							
Housing Repairs	2,865	1,574	5,781	2,650	2,550	2,550	15,105
Housing Project Development	3,967	860	1,915	1,650	1,650	1,650	7,725
New Build Programme	6,535	2,100	15,016	9,012	7,993	8,000	42,121
<b>Total Capital Expenditure</b>	<b>13,367</b>	<b>4,534</b>	<b>22,712</b>	<b>13,312</b>	<b>12,193</b>	<b>12,200</b>	<b>64,951</b>
<b>Financed By:-</b>							
<b>External</b>							
Grant	909	661	3,238	3,500	2,880	3,028	13,307
Contributions	0	0	0	0	0	0	-
<b>Internal:</b>							
-HRA Direct Revenue Financing	6,111	1,653	7,868	5,559	3,798	4,622	23,500
-HRA Reserves	6,347	2,220	11,606	4,253	5,515	4,550	28,144
-HRA Capital Receipts	0	0	0	0	0	0	-
<b>Total Financing</b>	<b>13,367</b>	<b>4,534</b>	<b>22,712</b>	<b>13,312</b>	<b>12,193</b>	<b>12,200</b>	<b>64,951</b>
<b>Cumulative Expenditure to be financed by Housing Revenue Account</b>	<b>6,111</b>	<b>1,653</b>	<b>9,521</b>	<b>15,080</b>	<b>18,878</b>	<b>23,500</b>	

### Funding Type Key:

IHRA	Internal Housing Revenue Account	EG	External Grant
IR	Internal Housing Reserve	EC	External Contribution
ICR	Internal Capital Receipt		

## Detailed HRA capital investment projects

HOUSING REPAIRS	2020/21	2020/21	2021/22	2022/23	2023/24	2024/25
	£000	£000	£000	£000	£000	£000
	Original	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget
Bathrooms	60	60	60	60	60	60
Central Heating/Boilers	570	570	440	500	500	500
Demolition - Garages	0	50	0	0	0	0
Disabled Works	220	130	180	180	180	180
Door entry system & doors - Park Rd & The Hemplands	80	30	70	0	0	0
Energy Efficiencies Work	200	10	200	200	200	200
Environmental Works	10	0	5	10	10	10
External Doors	20	20	20	20	20	20
Heat Metering	100	0	100	100	0	0
Housing Repair Vans	110	0	330	210	210	210
Kitchens - Programmed & Responsive	500	180	500	650	650	650
Re-Roofing	430	140	450	450	450	450
Rewiring	230	200	230	250	250	250
St Peters Court - Fire Risk Assessment	70	0	0	0	0	0
St Peters Court - Lift	250	125	125	0	0	0
St Peters Court - Open Reach	0	0	51	0	0	0
St Peters Court - Remove Cladding & Change windows	0	40	3,000	0	0	0
St Peters Court - sprinkler system- retention	0	14	0	0	0	0
Windows	15	5	20	20	20	20
<b>Total Budgeted Expenditure</b>	<b>2,865</b>	<b>1,574</b>	<b>5,781</b>	<b>2,650</b>	<b>2,550</b>	<b>2,550</b>
<b>Financed By :-</b>						
Housing Revenue Account	0	0	0	0	0	0
Housing Revenue Account Reserves	2,865	1,574	5,781	2,650	2,550	2,550
	<b>2,865</b>	<b>1,574</b>	<b>5,781</b>	<b>2,650</b>	<b>2,550</b>	<b>2,550</b>
<b>Project</b>						
Bathrooms	Replacement and improvements to bathrooms and layouts to the housing stock.					
Central Heating/Boilers	A rolling programme has been established which provides replacement heating appliances, boilers and installation					
Demolition - Garage	Demolition of garages and construction of parking area					
Disabled Works	These works provide disabled adaptations to the Council's housing stock to improve the living conditions of					
Door Entry System - Park Road & The Hemplands	New door entry system					
Energy Efficiency Works	Energy improvement works to properties, examples could be electrical improvements to blocks of flats to reduce					
Environmental Works	Works controlled by tenants for environmental improvements, examples could be additional estate parking,					
External Doors	A rolling programme provides replacement doors to the housing stock.					
Heat Metering	Works to be compliant with the Heat metering network regulations. Every communal system should have					
Housing Repair Vans	Cyclical renewal of Housing vans					
Kitchens	Replacement and improvements to kitchens and layouts to the housing stock.					
Re-Roofing	A rolling programme provides replacement roofs to the housing stock.					
Rewiring	Rewiring to the housing stock.					
St Peters Court - Fire Assessment	Fire Assessment of the St Peters Court tower block					
St Peters Court - Lift	Replacement of St Peters Court Lift					
St Peters Court - Openreach	Removal of old telecommunications wiring (H&S)					
St Peters Court - Remove Cladding & Change windows	Removal of cladding and upgrade to windows					
St Peters Court - Sprinkler System	Installation of sprinkler system					
Windows	A rolling programme provides replacement windows to the housing stock.					

HOUSING PROJECT DEVELOPMENT	2020/21	2020/21	2021/22	2022/23	2023/24	2024/25
	£000	£000	£000	£000	£000	£000
	Original	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget
Projects - New accommodation Project	500	0	0	0	0	0
Redevelopment Programme -Reconversions	185	20	185	150	150	150
Redevelopment Programme - Expenditure on Housing Redevelopment	2,300	0	650	500	500	500
Redevelopment Programme - Expenditure on Housing Acquisitions	982	840	1,080	1,000	1,000	1,000
<b>Total Budgeted Expenditure</b>	<b>3,967</b>	<b>860</b>	<b>1,915</b>	<b>1,650</b>	<b>1,650</b>	<b>1,650</b>
<b>Financed By :-</b>						
Housing Revenue Account	2,392	517	1,421	350	350	350
Housing Revenue Account Reserves	1,575	162	434	1,300	1,300	1,300
External Funding	0	181	60	0	0	0
	<b>3,967</b>	<b>860</b>	<b>1,915</b>	<b>1,650</b>	<b>1,650</b>	<b>1,650</b>
<b>Project</b>						
New Office Accommodation	Provision for alternative depot office accommodation.					
Redevelopment Programme	Redevelopment programme for purchased accommodation					

NEW BUILD PROGRAMME	2020/21	2020/21	2021/22	2022/23	2023/24	2024/25
	£000	£000	£000	£000	£000	£000
	Original	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget
New Builds	6,535	2,100	15,016	9,012	7,993	8,000
<b>Total Budgeted Expenditure</b>	<b>6,535</b>	<b>2,100</b>	<b>15,016</b>	<b>9,012</b>	<b>7,993</b>	<b>8,000</b>
<b>Financed By :-</b>						
Housing Revenue Account	3,719	1,136	6,447	5,209	3,448	4,272
Housing Revenue Account Reserves	1,907	484	5,391	303	1,665	700
External Funding	909	480	3,178	3,500	2,880	3,028
	<b>6,535</b>	<b>2,100</b>	<b>15,016</b>	<b>9,012</b>	<b>7,993</b>	<b>8,000</b>
<b>Project</b>						
New Builds	Provision of new housing					

## APPENDIX C

### Capital Programme External Funding Summary

Capital Projects 2020/21 to 2024/25	Project Cost £000	External Grant/Contribution £000	Net cost to East Suffolk £000
<b>General Fund</b>			
Bawdsey East Lane	35	-35	0
Corton & North Corton Hybrid Scheme	14,400	-14,400	0
East Point Pavillion	750	-750	0
Lowestoft Flood Risk Management Project Phase 1 (Tidal Walls, Pluvial & Fluvial)	16,836	-16,836	0
Lowestoft Flood Risk Management Project Phase 2 (Tidal Gate)	51,469	-51,469	0
Ness Point Regeneration Project	518	-478	40
Orbit HIA Disabled Facilities Grant	7,000	-7,000	0
Pakefield Coastal Resilience project	1,947	-1,897	50
Slaughden Coast/Estuary	35	-35	0
Southwold Harbour & South Pier	12,200	-12,200	0
Thorpeness (Externally Funded)	3,500	-3,500	0
	<b>108,690</b>	<b>-108,600</b>	<b>90</b>
	<b>Project Cost £000</b>	<b>External Grant/Contribution £000</b>	<b>Net cost to East Suffolk HRA £000</b>
<b>Housing Revenue Account</b>			
Housing Project Development Programme	870	-241	629
New Build Programme	42,121	-13,066	29,055
	<b>42,991</b>	<b>-13,307</b>	<b>29,684</b>