



**Riverside, 4 Canning Road, Lowestoft, Suffolk,  
NR33 0EQ**

# 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 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 in the Conference Room, Riverside, Lowestoft,  
on **Tuesday, 7 January 2020 at 6.30 pm**

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.

### **KEY DECISIONS**

- |          |   |                  |
|----------|---|------------------|
| <b>4</b> | <b>East Suffolk Council Engagement During the Development Consent Order Process for ScottishPower Renewables East Anglia One North and East Anglia Two Offshore Windfarm Proposals ES/0239</b><br>Report of the Deputy Leader and Cabinet Member with responsibility for Economic Development | <b>1 - 142</b>   |
| <b>5</b> | <b>Housing Development Strategy 2020-2024 ES/0240</b><br>Report of the Cabinet Member with responsibility for Housing   | <b>143 - 166</b> |
| <b>6</b> | <b>Acceptance of Grant Funding ES/0243</b><br>Report of the Cabinet Member with responsibility for Housing  | <b>167 - 207</b> |
| <b>7</b> | <b>Parking Services: Parking Management and CPE ES/0242</b><br>Report of the Cabinet Member with responsibility for Transport   | <b>208 - 223</b> |
| <b>8</b> | <b>Fees and Charges for 2020/21 ES/0241</b><br>Report of the Leader of the Council and Cabinet Member with responsibility for Resources, and the Assistant Cabinet Member for Resources   | <b>224 - 300</b> |

### **NON-KEY DECISIONS**

- |           |  |                  |
|-----------|--|------------------|
| <b>9</b>  | <b>Capital Programme for 2020/21 to 2023/24 including Revisions to 2019/20 ES/0246</b><br>Report of the Leader of the Council and Cabinet Member with responsibility for Resources, and the Assistant Cabinet Member for Resources                           | <b>301 - 317</b> |
| <b>10</b> | <b>Housing Revenue Account Budget Report 2020/21 ES/0249</b><br>Report of the Leader of the Council and Cabinet Member with responsibility for Resources, the Cabinet Member with responsibility for Housing, and the Assistant Cabinet Member for Resources | <b>318 - 336</b> |
| <b>11</b> | <b>Review of the Local Council Tax Reduction Scheme for 2020/21 ES/0247</b><br>Report of the Leader of the Council and Cabinet Member for Resources, and the Assistant Cabinet Member for Resources  | <b>337 - 343</b> |

<b>12</b>	<b>Beccles Lido Ltd Improvement Bid - Exceptional CIL Funding Request ES/0244</b>	<b>344 - 358</b>
	Report of the Cabinet Member with responsibility for Planning and Coastal Management	
<b>13</b>	<b>Infrastructure Team Service Improvements and CIL Spending Strategy ES/0245</b>	<b>359 - 406</b>
	Report of the Cabinet Member with responsibility for Planning and Coastal Management	
<b>14</b>	<b>Exempt/Confidential Items</b>	
	It is recommended that under Section 100(a)(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 and 3 of Part 1 of Schedule 12A of the Act.	

## Part Two – Exempt/Confidential

### KEY DECISION

- |           |  |
|-----------|--|
| <b>15</b> | <b>Purchasing of eight Section 106 Properties in Darsham</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> |

### NON-KEY DECISIONS

- |           |   |
|-----------|---|
| <b>16</b> | <b>Sale of Land Adjacent to Felixstowe Ferry Golf Course</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>17</b> | <b>Disposal of Property in Wrentham</b>   |
|           | <ul style="list-style-type: none"> <li>Information relating to any individual.</li> <li>Information relating to the financial or business affairs of any particular person (including the authority holding that information).</li> </ul> |

## 18      **Transfer of Assets in Melton**

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

**Close**

A handwritten signature in dark ink, appearing to read "Stephen Baker", with a long, sweeping horizontal line extending to the right.

Stephen Baker, Chief Executive

### **Filming, Videoing, Photography and Audio Recording at Council Meetings**

The Council, members of the public and press may record / film / photograph or broadcast this meeting when the public and press are not lawfully excluded. Any member of the public who attends a meeting and objects to being filmed should advise the Committee Clerk (in advance), who will instruct that they are not included in any filming.

If you require this document in large print, audio or Braille or in a different language, please contact the Democratic Services Team on 01502 523521 or email:

[democraticservices@eastsoffolk.gov.uk](mailto:democraticservices@eastsoffolk.gov.uk)



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## CABINET

Tuesday 7 January 2020

### **EAST SUFFOLK COUNCIL ENGAGEMENT DURING THE DEVELOPMENT CONSENT ORDER PROCESS FOR SCOTTISHPOWER RENEWABLES EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO OFFSHORE WINDFARM PROPOSALS**

#### **EXECUTIVE SUMMARY**

1. ScottishPower Renewables (SPR) have submitted two separate applications for nationally significant infrastructure proposals for offshore windfarm developments off the East Suffolk coast with onshore infrastructure from Thorpeness to a substation site immediately north of Friston. The applications were submitted to the National Infrastructure Unit of the Planning Inspectorate (PINS) on the 25 October 2019 and accepted on 22 November 2019.
2. The proposals have been the subject of pre-application consultation with the local authority and four formal rounds of public consultation, the last ended in March 2019. East Suffolk Council is a statutory consultee in the decision-making process, the Secretary of State for Business, Energy, and Industrial Strategy will make the final decision on the proposals based on the recommendation of the Examining Authority (appointed by PINS) following an examination process.
3. This report provides a summary of the main concerns set out in the draft Relevant Representation and an early draft Local Impact Report, with the full draft reports provided in the Appendix. East Suffolk Council has been working closely with Suffolk County Council on these projects.
4. Copies of the EA1N application documents are available on the PINS website at <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/> and EA2 application documents are available at

<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/>

Is the report Open or Exempt?	Open
<b>Wards Affected:</b>	Directly: Aldeburgh & Leiston, Indirectly: Southwold, Wrentham, Wangford & Westleton, Kessingland, Carlton Colville, Kirkley & Pakefield, Harbour & Normanston, Gunton & St Margarets, Lothingland, Rendlesham & Orford.
<b>Cabinet Member:</b>	Councillor Craig Rivett Deputy Leader & Cabinet Member with responsibility for Economic Development
<b>Supporting Officer:</b>	Naomi Goold Senior Energy Projects Officer 01394 444535 <a href="mailto:Naomi.goold@eastsoffolk.gov.uk">Naomi.goold@eastsoffolk.gov.uk</a>

## **1. INTRODUCTION**

- 1.1 The East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind farms are being developed by East Anglia One North Limited and East Anglia Two Limited, 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. SPR has submitted Development Consent Order (DCO) applications for both projects on 25 October 2019 and the Planning Inspectorate (PINS) has accepted the applications confirming they are valid on 22 November 2019. The applications are now within the pre-examination stage of the DCO process. The DCOs will be determined by the Secretary of State for Business, Energy and Industrial Strategy (BEIS) taking into consideration a report and recommendation from the Examining Authority (appointed by PINS) following an examination process.
- 1.2 Following acceptance of the applications by PINS the promotor has a duty to publicise the applications in accordance with the 2008 Planning Act. The notice provides a deadline of 27 January 2020 for the submission of a Relevant Representation on the projects to be received. A Relevant Representation is a summary of a person's or organisation's views on an application in writing. The submission of a Relevant Representation registers the author as an Interested Party, which ensures that they can take part in the examination process. As one of the host authorities, East Suffolk Council will automatically be identified as an Interested Party however we consider it is important to still submit a Relevant Representation to PINS.
- 1.3 During the pre-examination phase, in addition to the submission of Relevant Representations to PINS, an Examining Authority is appointed and the date for a Preliminary Meeting set. The Preliminary Meeting is where the applicant, interested parties and other stakeholders make oral representations to the Examining Authority about how they believe the application should be examined. The day after the Preliminary Meeting is the start of the examination which must be concluded within six months. At the close of the Examination, the Examining Panel then has three months to write a report and provide a recommendation to the Secretary of State, who has a further three months to issue a decision (total time of process usually 15 months).
- 1.4 Early in the examination process the Examining Panel will provide a deadline for the submission of a Local Impact Report (LIR) which is an objective assessment of the



positive, negative and neutral impacts of a project. In addition to the LIR, during the examination process East Suffolk Council will also need to:

- Submit Written Representations which is designed to expand upon the Relevant Representation where necessary,
- Submit Statements of Common Ground between the applicant and local authority clearly setting out the areas of common and uncommon ground,
- Attend and participate at hearings/accompanied site visits,
- Respond to Examining Authority's questions and requests for further information,
- Comment on other interested parties' representations and submissions as appropriate,
- Submit signed planning obligations if required.

- 1.5 The above list is not exhaustive but identifies some of the keyways in which East Suffolk Council will be expected to participate during the examination process. It is important for the Council to be able to be proactive and reactive on very short timetables throughout the DCO process particularly during the six-month examination section where the ability to respond quickly to the Examining Authority's requests is essential.
- 1.6 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 up to 800 megawatts generated by turbines up to 300m high above sea level. There will be a cable run 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, a small village. 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.
- 1.7 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 generated by up to 75 wind turbines up to 300m high above sea level. As above there will be a cable run 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.
- 1.8 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. Construction consecutively

could involve the first project being delivered and the land fully reinstated prior to delivery of the second project.

- 1.9 EA1N will have the generating capacity for approximately 710,000 households, EA2 for approximately 800,000 households.
- 1.10 East Suffolk Council and Suffolk County Council have been working closely regarding the projects. Previously, prior to the merger of Suffolk Coastal and Waveney District Councils, joint responses were submitted in relation to the different consultation phases between Suffolk Coastal District Council and Suffolk County Council, with Waveney District Council sending their own independent response. It has been made clear in previous consultation responses that the Councils are supportive of the principle of offshore wind development, both in terms of seeking to reduce carbon emissions and creating sustainable economic growth in East Suffolk provided this can be achieved without significant damage to the environment, residents and tourist economy of Suffolk.
- 1.11 Under the Climate Change Act 2008, UK Government set a 2050 target to reduce CO2 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.
- 1.12 The Offshore Wind Sector Deal includes an ambition for offshore wind to deliver 30 GW of generating capacity by 2030 but recognises the importance of delivering this in a sustainable way.
- 1.13 SPR has recently opened an Operations and Maintenance base in Lowestoft which is the onshore base for servicing their existing offshore windfarm which has just begun generating electricity – East Anglia One (EA1). Construction of the EA1 windfarm is due to be fully completed in 2020. They also have consent for, but have not yet commenced construction of, a further offshore windfarm East Anglia Three (EA3). These previous consents and those applied for in these applications form the East Anglia Array where seabed rights were awarded as part of the Crown Estate's Round 3 process. The export cables for EA1 and EA3 windfarms come ashore at Bawdsey, the cables are laid underground over a 37km route to a substation site in Bramford.
- 1.14 In addition to working with SPR and responding during the pre-application stage and now pre-examination stage of the projects East Suffolk Council and Suffolk County Council have been engaging with officials from BEIS and the Ministry of Housing, Communities and Local Government (MHCLG) to raise concerns regarding the current uncoordinated approach to offshore wind development and the resultant cumulative impacts of this approach.

- 1.15 A report was presented to the Strategic Planning Committee on 9 December 2019. The report was written at a time when the applications had just been accepted by PINS and the documentation only just published, officers were therefore still reading and assessing the material. For this reason, it was not possible to definitively state the Council's position on the two DCO applications and therefore the report outlined the published position at Phase 4 public consultation. During the meeting members of the Committee were given an oral presentation which outlined the schemes and highlighted some of the main issues regarding the projects. The recommendation was:

*That Strategic Planning Committee endorses and supports the Deputy Leader and Cabinet Member for Economic Development in seeking delegated authority, in conjunction with the Head of Planning and Coastal Management, from Cabinet in order to:*

- I. Be agile in responding to requests for information and documents during the Development Consent Order process for the East Anglia One North proposal including representing the Council/authorising technical officers to representing the Council at Hearings; and*
- II. Be agile in responding to requests for information and documents during the Development Consent Order process for the East Anglia Two proposal including representing the Council/authorising technical officers to representing the Council at Hearings.*

- 1.16 Paragraph 9.2 of the Strategic Planning Committee report clearly set out the reason for the recommendation, stating:

*Strategic Planning Committee is asked to endorse the Deputy Leader and Cabinet Member for Economic Development in working with the Head of Planning and Coastal Management throughout the DCO process for East Anglia One North and East Anglia Two, in responding to written questions, agreeing Statements of Common Ground, agreeing our Relevant Representations and Written Responses and submitting our Local Impact Reports as well as any other correspondence/documentation required of East Suffolk Council during the process. This request will be taken to East Suffolk Council Cabinet in January 2020. Suffolk County Council will be taking a similar request to their Cabinet within the same timeline.*

- 1.17 However, some Members of the Strategic Planning Committee may have been unclear at the time of the vote as to the consequences of supporting or not supporting the recommendation. The key issues raised by the Strategic Planning Committee in relation to the report and recommendation have been outlined below to ensure that notwithstanding the vote on the recommendation, the Committee Members' views have been reported to Cabinet.

- 1.18 During the debate, there was some discussion regarding the level of delegation requested for the Cabinet Member for Economic Development, in conjunction with the Head of Planning and Coastal Management. The necessity for this level of delegation is set out in paragraphs 1.4-1.5 and 9.1 of the report. Councillor Rivett confirmed during the meeting that regular updates would be provided to the Joint Local Authority Group (JLAG) and to the Strategic Planning Committee. A request was also made during the meeting for Councillor Cooper to be regularly updated which Councillor Rivett agreed to do.
- 1.19 During the meeting, there was also a question raised regarding the inability of members of the public to be involved directly in the Strategic Planning Committee's deliberations. In this instance, the Committee was not determining this application. Its role was to advice and make comments to the Cabinet. The Cabinet is then responsible for making the Council's response, as a statutory consultee. As East Suffolk Council is not the determining authority and is only a consultee, there is no provision in the Committee's procedure rules for public speaking on items of business that are not application which the Committee itself determines. Those wishing to raise questions or make comments themselves on this item of business needed to make them, directly, to the determining body, NSiP.
- 1.20 Since the Strategic Planning Committee, Officers have continued to read and assess the published documentation and, therefore, appended to this report is a draft Relevant Representation and a draft Local Impact Report.

## **2 PLANNING POLICY CONTEXT**

- 2.1 The proposals are considered Nationally Significant Infrastructure Projects (NSIPs) as established under the Planning Act 2008; consent for an NSIP takes the form of a DCO. The Planning Act 2008 makes provision for National Policy Statements (NPS), 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).
- 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 2013 Suffolk Coastal District Local Plan Core Strategy and Development Management Policies Development Plan Document contains policies of relevance. Policy SP12 'Climate Change' is of particular relevance which encourages schemes which create renewable energy where consistent with the need to safeguard residential amenity, the environment and the landscape.
- 2.4 The new Local Plan (covering the former Suffolk Coastal area) was submitted to the Planning Inspectorate for examination on Friday 29 March 2019, the examination hearings took place between 20 August and 20 September 2019. The new Local Plan

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 East Suffolk Council in due course. This policy has outstanding representations and was discussed with the Inspector and representors during the examination hearings, so at this stage the weight which can be attributed to this policy is reduced. The Inspector's Report is awaited but it is anticipated that the new Local Plan will be adopted early 2020. NPSs will however usually override local planning policy.

- 2.5 The 2019 Waveney Local Plan contains some policies of relevance. Policy WLP8.27 'Renewable and Low Carbon Energy' which is supportive of renewable energy schemes acknowledges in the introductory text that the impacts of renewable energy developments can go beyond the immediate locality where the onshore development is proposed. It is therefore important to consider the wider impacts. Although the onshore infrastructure of the projects is confined to the area subject of the Suffolk Coastal Local Plan, the offshore infrastructure will be visible at times along much of the East Suffolk coastline and the socio-economic impacts of the projects are more likely to be felt at the northern end of the East Suffolk district.
- 2.6 Suffolk County Council's Local Transport Plan (LTP2) recognises the 'Energy Coast' as a key area for growth and development and that the transport sector will be reliant on the development of renewable energy to power electric vehicles.

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

- 3.1 The vision for East Suffolk includes maintaining and sustainably improving the quality of life for everyone growing up, living in, working in and visiting East Suffolk. East Suffolk has a long history of hosting nuclear power stations, and we recognise the opportunities for the UK and more locally of hosting offshore wind farms and we have been supportive to date in relation to Galloper, Greater Gabbard, EA1 and EA3. The offshore wind industry is limited in the jobs that it offers in the longer term, however by encouraging the operating and maintenance bases to be located in our area this encourages the supply chain to locate locally also and is a boost to our economy. A Memorandum of Understanding has been previously agreed with SPR in relation to skills and employment support in the region and there are many positive stories in relation to this. It will be key for the proposals for EA1N and EA2 to build upon this existing base in order to support East Suffolk Council in addressing critical success factors identified in the Business Plan. A revised Memorandum of Understanding to include the EA1N and EA2 projects has been drafted.

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

- 4.1 East Suffolk Council has signed a Letter of Intent with SPR which enables us to recharge officer time spent across various service areas on the EA1N and EA2 projects. This enables us to fully engage with SPR on the specific technical details of their project in order to identify and mitigate potential adverse impacts arising from their development

proposals. We also work collaboratively with Suffolk County Council and other statutory consultees in order to ensure we are speaking with one voice where possible in order to emphasise our position in certain areas. The monies paid to this authority by SPR are reinvested in the service areas and used to backfill posts where necessary. By doing this, we aim to avoid the use of consultants (where we can) and maintain the knowledge and expertise in-house.

## **5 OTHER KEY ISSUES**

- 5.1 This report has not carried out its own Equality Impact Assessment (EqIA), as a consultee in the DCO process, we are not responsible for ensuring it has been carried out suitably, SPR will be responsible for carrying out their own EqIA on their consultation process.
- 5.2 The draft Relevant Representation and early draft Local Impact Report have been appended to this report in draft form as technical officers are continuing to read through the documentation associated within the applications and therefore may need to make changes or additions as appropriate. The deadline for the submission of the final Local Impact Report may also be after the adoption of the new Local Plan 2019 and therefore the document will need updating to reflect this.

## **6 CONSULTATION**

- 6.1 We have visited or offered to visit towns and parishes potentially impacted by the proposals during the pre-application phase of the process in 2018. East Suffolk Council has not carried out our own 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 carried out internal consultation with technical officers in areas including: economic development, coastal management, landscape, ecology, and environmental health in order to combine with technical responses from Suffolk County Council officers in areas including highways, archaeology, flood risk, education and skills in order to engage fully in the pre-application process with SPR.
- 6.2 SPR continue to engage with officers on the proposals and there are several documents to be produced over the coming months that will require further collaboration.

## **7 PROPOSALS**

- 7.1 The two applications are very similar, the primary difference between EA1N and EA2 wind farm applications relates to the offshore elements. The location of the offshore

order limits results in the projects having different impacts on the character and visual amenity of Suffolk's coastline and the setting, character and purpose of the AONB.

### Offshore Elements

- 7.2 During the Phase 4 public consultation the Councils jointly objected to the degree of visual harm that the proposed EA2 windfarm will have and the impact of EA1N and EA2 cumulatively and asked SPR to consider ways in which the visual impact of the proposals could be mitigated. The Councils also made a list of recommendations some of which have been addressed and some of which have not.
- 7.3 Since Phase 4 the promotor has reduced the lateral spread of the EA2 offshore order limits which has resulted in a more concentrated grouping of the turbines and slightly increased the distance from the closest point of the turbine array to the shore.
- 7.4 The offshore wind turbines of EA2 will however continue to have a significant adverse impact on the coastline between Covehithe and Orford. In addition, they will have significant in-combination effects with EA1N. The offshore wind turbines of EA1N will have significant adverse effects only in combination with those of EA2.
- 7.5 The promotor has identified through the Seascape, Landscape and Visual Impact Assessments (SLVIA) significant adverse landscape and visual effects on the Suffolk coast from these projects cumulatively. The combination of the offshore elements of the proposals will result in a direct 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.
- 7.6 The Council continues to have serious concerns regarding the degree of visual harm caused as a result of the wind turbines of EA2 and cumulatively with EA1N. It is not considered that the applicant has exhausted all reasonable mitigation measures to limit the cumulative impacts of the projects in terms of the design of the schemes, including height of the turbines. It is however recognised that the principal consultees in respect of the impact on the AONB and its significance is Natural England.
- 7.7 The presence of the turbines offshore can also have an impact on onshore heritage assets where the uncluttered seascape contributes to the assets' significance. The assessment of the impact of the offshore infrastructure on coastal assets is sound. However, there is a concern regarding the number of listed buildings that will be impacted by the proposals. Harm has been identified to buildings and conservation areas designed as seaside holiday resorts, the assessment of the impact of Lowestoft describes

the proposals as impacting 10 listed buildings. Several listings are group listings of large terraces, this means that in fact over 50 listed buildings in Lowestoft will be impacted.

### Onshore Elements

- 7.8 The onshore order limits for each project are identical. The report will provide an overview of the key considerations in relation to the projects which have been expanded upon in greater detail in the early draft Local Impact Report provided in Appendix B.

### *Substation Site*

- 7.9 At Phase 4 the Councils objected to the overall impact of the onshore substations on the local environment. Significant concerns were raised in relation to several matters including the impacts of the proposals on landscape and visual amenity, heritage assets, design and noise whilst concerns were also raised in relation to flood risk, ecology and land use. The mitigation proposals put forward at Phase 4 were not considered to adequately or satisfactorily address the concerns raised.
- 7.10 The impact of the substation and National Grid connection infrastructure on landscape and visual amenity remains a significant concern. It is not considered that the Landscape and Visual Impact Assessments (LVIA) fully recognise the degree of harm caused by the developments particularly in regard to the historic landscape character. The effectiveness of the proposed mitigation planting is not adequately justified especially as the assumed growth rates are not reasonably likely to be achieved in the local conditions. The visualisations are not considered reliable with the inclusion of unsecured pre-construction planting and trees and vegetation of significantly greater maturity than the 15 years specified. Therefore, it is concluded that mitigation planting will be largely ineffective for many years.
- 7.11 There are significant concerns regarding the adequacy of the noise assessment which it is considered underestimates the noise impacts at the substation site. These concerns relate to the modelling of the noise sources, omission of noise from National Grid infrastructure, rating level, assessment of background noise levels, omissions from the assessment and validity of the assessment method utilised.
- 7.12 There is 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. Or that the design refinement work will adequately seek to mitigate the operational noise emitted from the development.
- 7.13 There are concerns regarding the impact of the projects to the significance of a number of listed buildings which surround the substation site due to the impact of the developments on their setting. There is a concern that the assessments under predict the level of harm and there is disagreement on the principle that the mitigation planting will



help to reduce the impacts. The projects will also result in the loss of the historic parish boundary between Friston and Knodishall which runs directly through the middle of the proposed substation locations which has not been adequately addressed by the submissions.

- 7.14 Although recent flood events in Friston are not thought to have had their origin within the proposed substation site the information within the application is not sufficient to determine how the proposed development would interact with existing drainage patterns. This comment would equally apply to the next section of the report on the cable route.

#### *Cable Route*

- 7.15 At Phase 4 the Councils remained concerned about the effect of the location of the cable corridor and positioning of the haul road access point off Aldeburgh Road in relation to the setting of Aldringham Court, a grade II listed building. The building and its grounds were designed by Cecil Lay and the historic and architectural interest that comes from this association with a well-known local architect contributes to the significance of the asset. The development would require the removal of a section of the protected woodland to accommodate the development, it is recognised however that there is currently a high degree of visual separation between the building and this piece of land due to the large laurel hedge that forms a boundary to the formal gardens to the front and side of Aldringham Court.
- 7.16 The applications propose the undergrounding of the cabling in its entirety which it is recognised provides significant mitigation against the visual and landscape impacts. The developments will however still result in the loss of a number of important hedgerows. 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. The commitment to detailed pre-construction hedgerow surveys is welcomed which was highlighted within the Phase 4 response.
- 7.17 The onshore order limits pass in close proximity to a number of residential properties and are constrained in some areas, this is particularly true in relation to the section south of Sizewell Gap Road, the area surrounding the Hundred River crossing in Aldringham and at the substation site. It is considered that SPR should detail how they are going to manage preparatory works and construction works in these areas specifically in order to

minimise harm and disturbance. It is considered that measures beyond those generically outlined in the Code of Construction Practice are necessary.

### *Landfall*

- 7.18 The offshore export cables for both projects make landfall just north of Thorpeness village. The Phase 4 consultation response from the Councils sought further information from the applicant regarding the impact of the works on cliff stability, a commitment to remove the infrastructure in the nearshore area during decommissioning and to have early sight of surveys as they become available.
- 7.19 The export cables will come ashore through ducts installed using horizontal directional drilling (HDD) technique. As stated above there remains a concern regarding the potential for HDD to create vibration that may cause local destabilisation of the coastal cliffs. The promotor's approach to the cliff stability is not yet agreed and therefore further information on this will need to be sought through the examination process.
- 7.20 The applicant has stated that there is now a presumption in favour of the removal of the nearshore infrastructure which is a step in the right direction but that they will not be able to provide a commitment to this until the decommissioning phase.
- 7.21 Early in the pre-application phase the Councils expressed concerns regarding the interaction of the cables with the coralline crag outcrop located off the east coast. By selecting a southern landing location which, will minimise any negative impact on the crag from open cut trenching, the promotor has addressed this. The final cable drill line break out locations and transition bay locations should be agreed with East Suffolk Council based on further site investigations and revisions to the wording of the DCO requirements will be required to secure this. This is also important to ensure the infrastructure is not at risk of exposure from coastal change within the predicted service life. The Council will also be requesting that the proposed structures are removed at the end of the landfall site design life, or prior to loss from coastal erosion, whichever is sooner.
- 7.22 At Phase 4 the Councils sought additional information in relation to drainage, archaeology and ecology mitigation at the landfall site. The concerns regarding ecology and coastal habitats has been resolved via a commitment from the applicant in relation to drilling underneath the cliff and not requiring vehicles to access the beach. Archaeology is discussed within the next section of the report.

### *Project Wide Impacts*

- 7.23 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 however recognised that whilst the positive benefits are regionally felt, the negative impacts of the developments are felt more locally. At Phase 4 we sought further information from SPR in a number of areas in order to better understand the socio-economic impacts of the projects in order to increase the potential benefits and reduce the negative effects.

- 7.24 East Suffolk Council welcome the drafting of a new Memorandum of Understanding which establishes a commitment for the local authorities and SPR to work in partnership to maximise the education, skills and economic benefits of the SPR offshore wind projects. A list of specific objectives has been set out to help achieve this aim. The potential scale of local economic growth however hinges on the choice of both base and marshalling ports, which the promotor has not yet confirmed. The Council will work with SPR to demonstrate the economic benefits of using/placing these facilities at/in Lowestoft. Notwithstanding these positives, there are concerns in relation to the cumulative pressures on the labour force, on the supply chain and on accommodation for workers in combination with other major infrastructure projects, in particular the proposed Sizewell C new nuclear power station.
- 7.25 At Phase 4 the Councils requested that SPR needed to assess the impact of the projects on the perception of visitors and how this would impact their behavior during the construction phases of the projects. The promotor was also requested to consider the long terms impacts of the development on the tourist industry given the draw of the AONB and Heritage Coast. The potential impact on tourism is however still not considered to be adequately addressed within the submissions especially when taking into consideration the visitor survey undertaken by the Suffolk Coast Destination Management Organisation (DMO) which identifies that the cost to the tourism sector from the cumulative impacts of the construction of EA1N and EA2 in addition to Sizewell C to be at least £24 million per annum.
- 7.26 The Phase 4 consultation response raised a number of concerns regarding ecology some of which have been addressed and some of which have not. Whilst it is considered that the Environmental Statements adequately assess and provide mitigation/compensation measures for County Wildlife Sites, watercourses, great crested newts, reptiles, non-SPA/SSSI breeding birds and badgers, there are receptors which are either not considered to have been fully assessed or to have sufficient mitigation/compensation measures identified within the Environmental Statement and secured within the draft DCOs. These receptors include bats, hedgerows, woodlands and trees during construction, and designated sites in relation to adverse impacts on air quality during construction. In addition to these areas there is a lack of commitment to biodiversity net gain and concerns regarding the mechanism used to secure pre-construction surveys.
- 7.27 At Phase 4 the Councils requested that all remaining un-surveyed areas within the order limits should be subject to geophysical surveys, a systematic earthwork survey should be undertaken in addition to systematic trial trenching at some of the more constrained

areas as a minimum pre-submission. Although some archaeological investigations have taken place the scope of this work was not agreed with the Archaeological Service and the submitted information falls short of the level of detail required by Suffolk County Council archaeologists. This then raises questions in relation to the deliverability of the necessary archaeological investigatory works within the order limits of the projects.

- 7.28 The Councils sought further information at Phase 4 in relation to traffic and transport matters and expressed concerns regarding the impacts of Abnormal Indivisible Loads (AILs) and the adequacy of the mitigation proposed by the applicant. A number of the matters raised at Phase 4 remain unresolved, the Highways Authority considers that the proposals are inadequate in a number of ways including:
- i) the unwillingness to enter into a planning obligation to cover the cost of necessary highways works;
  - ii) the provisions for abnormal loads are insufficient;
  - iii) the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate to avoid an increase in accidents and that a new roundabout is required, and;
  - iv) there are too many variables around other energy projects to make the assumptions reliable.
- 7.29 The Outline Public Rights of Way (PRoW) Strategy is broadly acceptable for taking forward to the detailed PRoW strategy, however further detail is still required regarding the phasing and duration of closures, particularly where several PRoWs are close together and at the substation site. There is a concern that there could be closures and disruption of the network all at the same time. Public Rights of Way will suffer either permanent or temporary closure and it is considered that some of the compensatory routes are inadequate. The impact of the developments on the amenity and quality of the user experience of the public rights of way (PRoW) network has also not been adequately addressed by the applications.
- 7.30 At Phase 4 further information was requested in relation to air quality including measures for dust management and information regarding the potential impacts on the Stratford St Andrew Air Quality Management Area (AQMA). These matters remain concerns, there are also concerns that the potential traffic re-routing from non SPR traffic has not been captured and that there are discrepancies between the data provided in different Chapters of the Environmental Statements. This raises questions as to whether the worst-case scenario has been modelled. In addition, there are concerns regarding the cumulative impacts of the projects, the impact of the Sizewell C development has not been assessed for example. If Sizewell C is consented, EA1N and EA2's contribution to the cumulative effect of construction traffic increases the risk of exceedance of the NO<sub>2</sub> air quality objective within the Stratford St Andrew AQMA.

Further consideration is required in relation to the mitigation measures proposed within the applications.

#### *Cumulative Impacts*

- 7.31 The EA1N and EA2 submission documents acknowledge the need to cumulatively assess the projects with the proposed new nuclear power station, Sizewell C which is currently still in pre-application phase of the DCO process but due to be submitted to the Planning Inspectorate in the first quarter of 2020. SPR will need to update their cumulative assessment as more detailed assessments are published by EDF Energy to ensure their assessments are up to date.
- 7.32 SPR has recently announced that they intend to combine, if consented, EA1N, EA2 and the consented EA3 wind farm into one single delivery programme creating the East Anglia Hub. No account has yet been taken of the cumulative impacts of EA3 in addition to EA1N and EA2 during construction as the timing of the announcement came after the submissions of the applications. SPR will therefore need to ensure that in addition to updating the assessments in relation to Sizewell C and the publication of new information, that EA3 is included in the cumulative assessments so that the full cumulative implications during the construction phase are understood.
- 7.33 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 SPR 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 Galloper extension project was given a preliminary connection offer (pre-CION process) at the proposed substation immediately north of Friston village. It would therefore seem highly likely that the Greater Gabbard extension project has received the same preliminary offer. This illustrates that the National Grid substation proposed within the SPR applications is being seen by National Grid as a strategic connection point for future projects without the potential impacts being cumulatively assessed and without any of this future development being considered within the existing masterplan for the site.
- 7.34 It is recommended that the Council continues to advocate for cumulative assessment of the existing and future projects with Government and locally with the promoters.

#### *Mitigation/Compensation*

- 7.35 SPR are of the view that they have submitted robust applications with built in mitigation to address any impacts arising and as such do not, at this time, believe additional mitigation is required. For this reason, they argue it would not be appropriate to provide a Section 106 under the Town and Country Planning Act 1990 as such an agreement would not be 'necessary to make the proposed development acceptable in planning

terms', one of the tests set out in the Overarching National Policy Statement – EN1 (NPS EN-1).

- 7.36 The submitted applications however identify significant residual impacts as a result of the developments. It is this Council's view that these residual impacts should be appropriately mitigated and, if this is not possible, compensated in line with the mitigation hierarchy which requires the promotor to first seek to avoid adverse impact, and only if the impacts cannot be avoided should minimisation and mitigation be considered. If it is not possible to mitigate the impacts, compensation should be considered, this is also in accordance with national policy.
- 7.37 SPR has however proposed agreements under Section 111 of the Local Government Act. For EA2 SPR has committed to provide funding to address a number of the significant effects identified in the Environmental Statement which relate to the substation, onshore cable route and offshore infrastructure's impact on the AONB. For EA1N the applicant has committed to a s111 fund to address the residual significant effects identified within the Environmental Statement which relate to the onshore substation and onshore cable route. The difference between a s111 and s106 is that under a s111 no direct link between the proposed development and the compensatory measures must be demonstrated and therefore the funding would not be a material planning consideration. It is however argued that the applicant should seek to address the residual impacts of the projects through a s106 which meets the appropriate tests and is directly linked back to the impacts of the projects.
- 7.38 The requirements set out in the DCOs state that the discharging authority will be East Suffolk Council. We are content with this wording and will carry out these duties in consultation with Suffolk County Council and other relevant statutory stakeholders as relevant. As East Suffolk Council will be responsible for any enforcement action (section 173 Planning Act 2008) it would not be appropriate for the requirements to be discharged by another organisation.

#### *Summary*

- 7.39 The 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. The local impacts of the projects and their cumulative impacts should be considered and adequately addressed by the applicant.
- 7.40 At present however there are significant areas where the Council's concerns remain unresolved, these have been outlined in the above report and set out in further detail in the early draft Local Impact Report. 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. There are also a number of additional issues which have not been adequately addressed within the applications which have been outlined above.

## **8 OTHER OPTIONS CONSIDERED**

- 8.1 Alternative options were considered in the early stages of proposals but at this stage we are presented with the proposals, it is not for us to consider alternative options to that provided by SPR in their proposals.
- 8.2 Cabinet may wish to consider a different stance on some of the issues raised in the draft Relevant Representation or early draft Local Impact Report.

## **9 REASON FOR RECOMMENDATION**

- 9.1 It is important for East Suffolk Council to be able to be proactive and reactive on very short timetables throughout the DCO process particularly during the six-month examination section where the ability to respond quickly to questions raised by the Examining Authority (PINS) is essential. Delegated Authority is therefore being sought to facilitate the ability to fully engage with the pre-examination and examination stages of the DCO process. This is inline with the recommendations set out in PINS Advice Note 2 states:

*“During the examination there will be numerous deadlines for local authorities and other interested parties to submit further representations. These often require swift responses to ensure all matters can be fully explored before the close of examination”.*

*“A local authority will therefore need to ensure it has appropriate delegations in place. There is unlikely to be time to seek committee approval for representations made by a local authority during the examination. In general terms a local authority must assume that it won’t be possible for the examination timetable to be structured around its committee cycle” (paragraph 12.3).*

- 9.2 The recommendations also present the Council’s proposed position heading into the Examinations on the EA1N and EA2 offshore wind farm projects based on the published documentation in relation to the applications.

### **RECOMMENDATIONS**

1. That the Head of Planning and Coastal Management in consultation with the Deputy Leader and Cabinet Member with responsibility for Economic Development be granted 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 with responsibility 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 be 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.

<b>APPENDICES</b>	
<b>Appendix A</b>	Draft Relevant Representation for EA1N and EA2
<b>Appendix B</b>	Early Draft Local Impact Report for EA1N and EA2

## **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.

<b>Date</b>	<b>Type</b>	<b>Available From</b>
22.11.19	East Anglia One North application documents	Planning Inspectorate's website - <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>
22.11.19	East Anglia Two application documents	Planning Inspectorate's website - <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>
26.03.19	ESC and SCC Phase 4 Consultation Response	East Suffolk Council's website - <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/Phase-4-Consultation-Response-from-SCC-and-SCDC-26.03.19.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/Phase-4-Consultation-Response-from-SCC-and-SCDC-26.03.19.pdf</a>

**Appendix A – East Suffolk Council Draft Relevant Representation****Draft Relevant Representation of East Suffolk Council under section 56 of the Planning Act 2008 in respect of the East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind farm applications.**

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. The local impacts of the projects and their cumulative impacts should be considered and adequately addressed by the promotor.

The areas where the Council has significant concerns and the issues remain unresolved have been outlined below, these matters will be further expanded in future representations submitted separately:

- Landscape and Visual Effects – The applicant has not fully understood the character and significance of the features and landscape elements of the substation site, especially in relation to the historic landscape character and therefore the Environmental Statement does not fully recognise the harm caused by the development. The effectiveness of the proposed mitigation planting has not been adequately justified especially as the assumed growth rates are not reasonably likely to be achieved in the prevailing local conditions. The visualisations are not considered reliable with the inclusion of unsecured pre-construction planting and trees, and vegetation that is seemingly of significantly greater maturity than the 15 years specified. The mitigation planting will therefore be largely ineffective for many more years than is claimed.

The applicant has not demonstrably exhausted all reasonable measures to minimise the impacts of the permanent onshore substations. It is essential that the size and scale of the proposals is minimised with careful consideration given to the layout of the site, building design and materials.

- Noise – There are concerns regarding the adequacy of the noise assessment which it is considered underestimates the operational noise impacts at the substation site. The Council has concerns regarding the modelling of the noise sources, omission of noise from National Grid infrastructure, rating level, assessment of background noise levels, omissions from the assessment and validity of the assessment method utilised. There is also a concern that the construction noise assessment may have been underestimated.

- Design and Masterplan – There is insufficient commitment within the Outline Design Principles Statement to secure the minimisation of the scale and impacts of the substations, adequately mitigate the noise emitted or address the future expansions of the site. East Suffolk Council is also not content that the draft Development Consent Orders (DCO) do not apply the Outline Design Principles to the National Grid substation.
- Substation – there are concerns in relation to the onshore substation infrastructure associated with both EA1N and EA2 and the impacts on landscape and visual amenity, heritage assets, noise and public rights of way. When taken together there will be a significant adverse impact in respect of the sensitivity of the receiving landscape, local residents and visitors. The mitigation proposals presented to date do not satisfactorily address these concerns.
- Traffic and Transport - The Council considers that the proposals are inadequate in a number of ways including:
  - the provisions for abnormal loads are insufficient;
  - the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate to avoid an increase in accidents and that a new roundabout is required, and;
  - the unwillingness to enter into a planning obligation to cover the cost of necessary highways works;
  - there are too many variables around other energy projects to make the assumptions reliable;
- Seascape and Visual Effects – The in-combination impacts of the offshore wind turbines of both projects and the visual effects of EA2 alone, will result in significant adverse landscape and visual effects on the Suffolk coast including on the character and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The offshore turbines will have a significant and long-term negative impact on a nationally designated landscape. Given the sensitivity and designation of the receiving landscape and seascape, the promotor has not demonstrably exhausted all reasonable mitigation measures in terms of design of the scheme, including the height of the turbines.

East Suffolk Council recognises that the principal consultee in respect of the impacts of the development on the AONB and their significance is Natural England. However, the Council is seeking to meet its duties under section 85 of the Countryside and Rights of Way Act 2000.

- Cumulative Impacts –The full cumulative impacts of the existing and potential future projects in the East Suffolk area have not been adequately assessed within the applications.
- Despite the assessments within the Environmental Statement identifying residual impacts from the projects regarding landscape and visual effects, seascape and visual effects, ecology and setting of heritage assets, no additional mitigation and/or compensation is proposed to be secured through a s106 agreement. Although funding secured via a s111 agreement is proposed, we understand this cannot be a material planning consideration.

East Suffolk Council also has concerns or would wish to make representation in a number of additional areas which have been outlined below:

- Socio-Economic – The Council welcomes the creation of a new Memorandum of Understanding which establishes a commitment for the local authorities and SPR to work in partnership to maximise the education, skills and economic benefits of the SPR offshore wind projects. The potential scale of local economic growth however hinges on the choice of both base and marshalling ports, which the applicant has not confirmed. The Council will work with SPR to demonstrate the economic benefits of using the facilities at Lowestoft. Notwithstanding these positives, the Council is concerned in relation to the cumulative pressures on the labour force and on accommodation for workers with other major infrastructure projects, in particular the proposed Sizewell C new nuclear power station. The potential impact on tourism is not adequately addressed within the submissions especially when taking into consideration the visitor survey undertaken by the Destination Management Organisation (2019).
- Heritage - The assessments under predict the level of harm caused by the developments on the settings of some listed buildings and the Council disagrees with the principle that the mitigation planting will help to reduce the impacts. The projects will also result in the loss of the historic parish boundary between Friston and Knodishall which runs directly through the middle of the proposed substation site, this has not been adequately addressed.
- Air Quality – The promotor’s assessment shows a risk of adverse impacts to residential amenity and environmental quality. Additional information to demonstrate that adverse impacts have been completely mitigated and managed is required. Should Sizewell C’s DCO application be successful, cumulative construction traffic impacts from EA1N/EA2 and Sizewell C pose a risk to achieving the NO<sub>2</sub> annual mean air quality

objective within the Stratford St Andrew Air Quality Management Area. A requirement is recommended to ensure an action group proactively manage construction traffic to minimise exceedance risks.

- Public Rights of Way – The impact of the developments on the amenity and the quality of the user experience of the public rights of way network has not been adequately addressed in the application. This aspect should be a separate theme within the Environmental Statements in order to address the impact on both the tourism industry and the local communities.
- Flood Risk - Although recent flood events in Friston are thought not have had their origin within the proposed substation site the information within the application is not sufficient to determine how the proposed development would interact with existing drainage patterns.
- Ecology – The Council is concerned that there are some ecological receptors which are either not considered to have been fully assessed or have insufficient mitigation/compensation measures identified within the Environmental Statements and secured within the draft DCO. These include the impact on bats, hedgerows, woodlands and trees during construction and designated sites in relation to adverse impacts on air quality during construction. In addition to these areas the Council is disappointed with the lack of commitment to biodiversity net gain.
- Coastal Change – Further information is necessary to demonstrate the proposed works do not cause local cliff destabilisation or damage to the sub-sea crag outcrop and revisions are required to the requirements to ensure that the detailed design of the works is submitted for approval before construction commences.
- Archaeology – the submitted information falls short of the level of detail required by the County Archaeologists. This calls into question the delivery of the schemes within the red line boundary.
- Construction Management – there are specific points along the onshore cable corridor where the order limits are constrained, or the construction works will occur very close to residential properties i.e. area south of Sizewell Gap Road, Hundred River Crossing and Friston. Further work is necessary to understand how pre-construction and construction works in these areas would be managed to minimise harm. The Council would also wish to see greater coordination between the construction of the projects.

### Summary Position of East Suffolk Council

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 AONB. There are also a number of additional issues which have not been adequately addressed within the applications which have been outlined above. The relevant issues will be set out in more detail within our further submissions.

The Council will seek to engage with the applicant in relation to the concerns outlined above in order to try and minimise the harm caused by the projects and address the issues raised where possible.

The Council will continue to seek and advocate for s106 agreements to secure appropriate mitigation and/or compensation in relation to the identified impacts of the proposals.

The Council will continue to raise concerns and seek to work with Government, namely the Ministry of Housing, Communities and Local Government (MHCLG) and Department for Business, Energy and Industrial Strategy (BEIS) with regards to the cumulative impacts on East Suffolk of the numerous energy projects existing and forthcoming.

**ES/0239**

**APPENDIX B – EARLY DRAFT LOCAL IMPACT REPORT FOR EA1N AND EA2  
WINDFARMS**

Please note - Separate Local Impact Reports will be submitted for EA1N and EA2 windfarm projects, however for ease one draft report has been written for both projects at present.

DRAFT

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## 1. Terms of reference

### Introduction

- 1.1. This report comprises the Local Impact Report (LIR) of East Suffolk Council and Suffolk County Council, referred to as “the Councils”. On the 1 April 2019 East Suffolk Council was created by parliamentary order, covering the former districts of Suffolk Coastal District Council and Waveney District Council.
- 1.2. The Councils have had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), Department for Communities and Local Government’s (DCLG – now Ministry for Housing Communities and Local Government) Guidance for the examination of applications for development consent and the Planning Inspectorate’s (PINS) Advice Note One: Local Impact Reports, in preparing this LIR.
- 1.3. **ScottishPower Renewables (SPR) has submitted two applications for Development Consent Orders (DCO) East Anglia One North (EA1N) and East Anglia Two (EA2). This LIR relates to xxx, but is almost identical to the LIR of xxx, the only exception being paragraphs xxx in Section xxx.**

### Scope

- 1.4. The LIR only relates to onshore impacts of the proposed development as it affects the administrative areas of East Suffolk Council and Suffolk County Council.
- 1.5. The report specifically describes the impact of Works (described in the Development Consent Orders (DCO)); namely:
- 800mw wind farm minimum 36km from shore (Lowestoft) – EA1N;
  - 900mw wind farm minimum 33km from shore (Southwold) – EA2
  - Up to two export cables laid underground landing at Thorpeness and connecting to up to two transition bays for each project;
  - Up to six electrical cables laid underground between the landfall and the substation location north of Friston with associated cable jointing bays for each project;
  - EA1N substation, EA2 substation, National Grid substation and associated grid connection works immediately north of Friston,
  - Temporary construction consolidation sites for each project and;
  - Other onshore construction activities and temporary works associated with the above.

- 1.6. This LIR does not describe the proposed development any further, relying on the promotor's description as set out in DCO application documents.
- 1.7. Only a brief description of the development area is provided to highlight specific features within the onshore Order Limits. The promotor's Environmental Statement (ES) otherwise provides an acceptable description.
- 1.8. The Councils have experience of the DCO process and post consent phases of other windfarm projects. East Anglia One (EA1) windfarm was consented in 2014 and is due to be completed in 2020 and the East Anglia Three (EA3) windfarm which was consented in 2017 but has not yet implemented.
- 1.9. There is no relevant planning history to be described, the Order Limits largely encompass greenfield land other than where it encompasses watercourses, woodlands or the public highway.

**Purpose and structure of the LIR**

- 1.10. PINS Advice Note One: Local Impact Reports, refers s60 (3) of the 2008 Planning Act which defines the purposed of Local Impact Reports as:

“a report in writing giving details of the likely impact of the proposed development on the authority's area.”
- 1.11. It does this under topic-based headings reflecting the likely nature of the impacts. The key issues for the Councils and the local community are then identified followed by commentary on the extent to which the promotor addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.

## 2. Description of the Area

- 2.1. The onshore cable corridor passes through approximately 9km of countryside on its route from the landfall at Thorpeness to the substation site at Friston/Knodishall. The entire onshore Order Limits are within East Suffolk Council's administrative boundaries.
- 2.2. The application proposes the cables to come ashore within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and the Heritage Coast at Thorpeness. The cliffs in the area of the landfall comprise weakly cemented Pleistocene rocks and sediments with the coastline suffering from episodic coastal erosion. The landscape is typical of the coastal dunes and shingle ridge character type. Once north of the settlement of Thorpeness the section of the coastline is relatively undeveloped and uncluttered with the Suffolk Coast Path following the coast northwards.
- 2.3. In addition to being within the defined Heritage Coast and AONB national landscape designation, the landfall area also lies partly within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI).
- 2.4. Once under the unconsolidated cliffs the cables run under Thorpeness Common and part of the Leiston-Aldeburgh SSSI and then head north remaining within the AONB. The cable corridor travels through the flat landscape of the estate sandlands, comprising agricultural land with light sandy soils crossing several hedgerows. The corridor passes between small areas of woodland and runs to the east of the Sandlings Special Protection Area (SPA) and main Leiston-Aldeburgh SSSI which provides important heathland habitat for both flora and fauna. The route also requires the crossing of both a byway open to all traffic, a public right of way (PRoW) and a bridleway. Along this coastal stretch the cable corridor passes near a cluster of residential properties.
- 2.5. After approximately 1.5km from the landfall the onshore cable corridor turns to head eastwards requiring the crossing of the Sandlings SPA and Leiston-Aldeburgh SSSI. Once crossed, the route leaves the AONB and travels in a south-westerly direction through agricultural land requiring the crossing of further hedgerows, public footpaths, and bridleways.
- 2.6. The cable corridor crosses Thorpeness Road (B1353) and immediately heads into the Hundred River Valley Special Landscape Area where the landscape character changes crossing the coastal levels character type. The Hundred River is crossed, and the route continues west crossing Aldeburgh Road (B1122) and through a protected woodland

(SCDC/87/00030) to the south of Aldringham Court, a Grade II listed building. At this point the cable corridor runs parallel to Fitches Lane which has occupied residential properties fronting the Lane. The route passes back into the estate sandlands character type leaving the coastal levels.

- 2.7. Once through the woodland, the route crosses PRoWs and continues westwards for approximately 1km leaving the Special Landscape Area passing through agricultural land to the south of Coldfair Green requiring the crossing of hedgerows.
- 2.8. The route continues west crossing Sloe Lane and Snape Road (B1069). After crossing Snape Road, the route heads north-westerly through agricultural land for a further 1.5km until crossing Grove Road to the south of Grove Wood, an ancient woodland. Once across Grove Road the Order Limits open out to form the substations location. The cable route will need to cross further PRoWs (footpath and bridleway) and multiple hedgerows.
- 2.9. In terms of landscape character, the western section of the cable corridor at the substation site and to the east of Grove Road straddles different character areas: the estate sandlands and ancient estate claylands.
- 2.10. The substation location sits immediately to the north of the main settlement of Friston village. Once across Grove Road, the landscape has a more intimate arrangement of fields with hedgerows marking the field boundaries with a more open character towards the northern section of the substations site. The overhead electricity cables transmitting electricity from Sizewell to Bramford pass through the landscape relatively discretely immediately to the north of the proposed substations location. The Order Limits provide a large area either side of the overhead lines for realignment work and National Grid infrastructure.
- 2.11. There is a public footpath which marks the historic parish boundary between Friston and Knodishall running north-south between the village and properties to the north of the Order Limits. There are several residential properties which sit along the boundary of the Order Limits, some of which are Grade II listed. There is also a Grade II\* church just to the south of the limits within Friston village.
- 2.12. The woodland of Laurel Covert lies within the Order limits to the north of Friston.

### **3. Statutory Development Plan**

- 3.1. The LIR primarily focuses on local planning policy but in some sections of the report reference is made to the National Planning Policy Framework (NPPF) and the Overarching National Policy Statement for Energy – EN1 (NPS EN-1) where relevant.
- 3.2. The relevant documents that comprise the Development Plan are identified below. Other policy documents which might be considered as material considerations are also identified below.
- 3.3. As previously stated, East Suffolk Council was created on 1 April 2019, joining the former districts of Suffolk Coastal District Council and Waveney District Council. The Local Government (Boundary Changes) Regulations 2018 (part 7) state that any plans, schemes, statements or strategies prepared by the predecessor council should be treated as if it had been prepared and, if so required, published by the successor council - therefore any policy documents referring to “Suffolk Coastal District Council” or “Waveney District Council” continue to apply to East Suffolk Council until such time that a new document is published.

#### **East Suffolk Council Local Plan**

- 3.4. The Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document has been adopted and forms part of the Development Plan relating to the former Suffolk Coastal planning authority area. It was adopted in July 2013. Upon its adoption several the policies within the pre-existing Suffolk Coastal Local Plan were ‘Saved,’ and others were superseded or abandoned.
- 3.5. The Waveney Local Plan was adopted on 20 March 2019 and forms part of the Development Plan relating to the former Waveney local planning authority area.
- 3.6. The relevant Local Plans for the District consists of:
  - East Suffolk Council - Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document (Adopted July 2013),
  - East Suffolk Council - Waveney Local Plan 2019,
  - East Suffolk Council - Suffolk Coastal District Local Plan – Site Allocations and Site Specific Policies Development Plan Document (Adopted January 2017)
  - The ‘Saved’ Policies of the Suffolk Coastal Local Plan 2006 incorporating the first and second alterations.
  - East Suffolk Council - Suffolk Coastal Local Plan 2019 - Final draft (January 2019)

- 3.7. The relevant policies of the Local Plans will be referred to within this LIR when appropriate.
- 3.8. The new Local Plan (covering the former Suffolk Coastal area) was submitted to the Planning Inspectorate (PINS) for examination on Friday 29 March 2019, the Examination took place between 20 August and the 20 September 2019.
- 3.9. At this stage in the plan making process, the policies that received little objection (or no representations) can be given more weight in decision making if required, as outlined under Paragraph 48 of the NPPF (2019). Modifications to the Local Plan following the Examination are awaited. Policy SCLP3:4 Proposals for Major Energy Infrastructure Projects, has outstanding representations so at this stage the level of weight which can be attributed to this policy is reduced.
- 3.10. Please note all policies starting DM or SP relate to the adopted District Local Plan (2013), all policies starting SCLP relate to the final draft of the new Local Plan (2019) which is not yet adopted.

#### **Suffolk County Council Minerals and Waste Local Plan**

- 3.8 The adopted policies of the Minerals and Waste Development Framework are contained within the following documents:
- Suffolk Minerals Core Strategy (Adopted 2008);
  - Suffolk Minerals Site Specific Allocations (Adopted 2009); and
  - Suffolk Waste Core Strategy (Adopted 2011).
- 3.9 The Inspector's Report in respect of the Suffolk Minerals & Waste Local Plan has been received and the Plan is due to be adopted in March 2020. At which point the previous minerals and waste plans will be superseded.

#### **Summary**

- 3.10 In summary, the statutory Development Plan for the district is at the time of writing comprised of:
- East Suffolk Council's Suffolk Coastal District Local Plan 2013,
  - East Suffolk Council's Site Allocations and Site Specific Policies Development Plan Document 2017;
  - East Suffolk Council's - Waveney Local Plan 2019,
  - Suffolk Minerals Core Strategy 2008;
  - Suffolk Minerals Site Specific Allocations 2009, and;

- Suffolk Waste Core Strategy 2011.

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## 4. Other Relevant Local Policy

- 4.1 The Suffolk Shoreline Management Plan (SMP) 7 was published in 2012. The preparation of an SMP is the duty of the operating authorities responsible for managing the coastline. Suffolk Coastal District Council now East Suffolk Council adopted the SMP in November 2011, this document was endorsed by Suffolk County Council.
- 4.2 East Suffolk Business Plan recognises the onshore and offshore energy sector as one of East Suffolk's distinctive economic strengths.
- 4.3 East Suffolk Economic Growth Plan 2018-2023 sets out how East Suffolk Council and its partners will achieve economic growth through maximising the competitive advantage in key sectors such as energy. The plan identifies the opportunities and potential that exists in the energy sector as key to working towards the vision that businesses across East Suffolk have the confidence to invest and grow, creating opportunities for people of all ages and improving further the quality of life in an outstanding environment.
- 4.4 New Anglia Local Enterprise Partnership (NALEP) which covers Norfolk and Suffolk published The Economic Strategy for Norfolk and Suffolk in 2017. The document sets out the ambition for Norfolk and Suffolk to be a centre for the UK's clean energy sector and outlines the plans for future growth identifying the Norfolk and Suffolk coast as an energy coast - a priority place where evidence shows there are significant opportunities and commitments for continued growth.
- 4.5 NALEP is working to develop a Local Industrial Strategy for Norfolk and Suffolk which is currently in draft form. The Local Industrial Strategy is the next stage in the evolution and implementation of the Norfolk and Suffolk Economic Strategy and supports and builds upon this published document.
- 4.6 The AONB Management Plan 2018-2023, has been produced in accordance with the Countryside and Rights of Way Act 2000. It seeks to conserve and enhance the special landscape (and seascape) characteristics of the AONB and ensure that they are taken into account and enhanced by the planning process, with impacts of major infrastructure development avoided, mitigated or offset. It promotes, and recognises the importance of, sustainable recreation and tourism within the AONB and seeks to enhance the understanding of its historic and cultural assets. The Suffolk Heritage Coast is largely contained within the AONB and there are no statutory requirements or powers associated with the Heritage Coast definition.



- 4.7 The AONB - Natural Beauty and Special Qualities Indicators document was published on 20 November 2016. It seeks to establish what constitutes the natural beauty and special qualities of the whole of the AONB. The document follows a rigorous criteria-based approach for establishing and identifying the special qualities of this nationally important landscape.

**Summary**

- 4.8 There are several additional documents produced and endorsed by the relevant authorities which represent local policy on specific topics, which the Councils consider of relevance to this development.

## **5. Assessment of Impacts and Adequacy of Response**

### **Introduction**

- 5.1. The following sections identify the relevant policies within the Development Plan and other local policy, the key issues raised by the proposed development and the extent to which the submission addresses them and thus the degree of policy compliance.

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## **6. The Principle of the Development**

### **East Suffolk Council Local Plan**

- 6.1. Policy SP12: Climate Change supports development that contributes towards the mitigation of climate change and encourages, among others, renewable energy schemes “where consistent with the need to safeguard residential amenity, the environment and the landscape”.
- 6.2. Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects sets out the matters which the local authority will take into consideration including the nature, scale, extent and potential impact of proposals in addition to the cumulative impacts. The policy seeks to ensure that local benefits and ongoing legacy of development is achieved.
- 6.3. Policy SCLP9.1: Low Carbon & Renewable Energy recognises the need to transition to a low carbon future and supports low carbon and renewable energy developments where they are within a suitable area or satisfy specific criteria which includes consideration of the existing environment and avoiding significant adverse impacts. The policy however primarily focuses on onshore wind turbines as opposed to offshore turbines with onshore infrastructure, but it is of some relevance.
- 6.4. By virtue of the representations received in relation to the above policies contained within the Final Draft Local Plan 2019, only very limited weight can be given to them and therefore the focus of consideration will be on the current Local Plan (2013).

### **Other Relevant Local Policy**

- 6.5. The Suffolk Growth Strategy and emerging New Anglia Plan for Growth provide particular support for offshore wind development based on the likely local economic benefits.
- 6.6. East Suffolk Business Plan recognises the onshore and offshore energy sector as one of East Suffolk’s distinctive economic strengths.

### **Commentary**

- 6.7. The Development Plan, without containing detailed policies specific to the principle of the scheme being proposed (either the cabling or substations), promotes renewable energy schemes more generally.

- 6.8. Policy SP12 recognises the contribution East Suffolk can make towards the generation of renewable energy through wind power and seeks to encourage and promote schemes. The principle of renewable development within the District is therefore supported however the policy makes it clear that this is subject to the consideration of the impacts on residential amenity, the environment and landscape. The explanatory text in relation to the policy also identifies the significant cumulative impacts on the East Suffolk countryside which can result and highlights the importance of grid connection issues not being resolved in a holistic manner.
- 6.9. The broad principle of the development of a wind farm project in East Suffolk is policy compliant however Policy SP12 clearly identifies the need for full consideration of the impacts of any scheme. Consideration of the compliance with the development in relation to specific local plan policies will be discussed in detail in the following sections. Broader support for this development can also be found in the relevant growth strategies and Business Plan for this area.

#### **Adequacy of the application/DCO**

- 6.10. The Councils have previously expressed concerns regarding the method of working being proposed by SPR which could result in the first scheme being constructed and land restored prior to the second project commencing, disrupting the same communities and environment again.
- 6.11. DCLG's Guidance on associated development applications for major infrastructure projects notes that one of the core principles that the Secretary of State will take into account in determining whether something is in fact associated development will be whether it supports "the construction or operation of the principal development, or help address its impacts". The guidance therefore allows for the inclusion of infrastructure for a future project under the first as shown by the earlier EA1 (SPR) and EA3 (SPR) schemes. The fact that the EA1N and EA2 projects are proposed by the same promotor, share onshore Order Limits and have been submitted at the same time should only serve to make such coordination easier.
- 6.12. The Councils therefore wish to see SPR commit to an integrated and efficient approach to developing the two wind farm projects in order to lessen the detrimental effects which will be experienced. This issue is discussed further in Section 25 towards the end of this report.
- 6.13. The guidance on associated development also makes it clear that the core principles have been written as not to prevent "associated infrastructure development (such as a network connection) that is on a larger scale than is necessary to serve the principal

development if that associated infrastructure provides capacity that is likely to be required for another proposed major infrastructure project". The Councils are aware that the National Grid substation proposed under this application is being treated as a strategic grid connection location for future major energy infrastructure projects. This is evident by the connection offers made by National Grid which are detailed further in Section 26 of this report. It is therefore not clear why the necessary future expansion of the network connection is not being fully considered. The Councils question whether the current approach taken to associated development is robust.

- 6.14. The DCO is otherwise adequate with respect to the description of the development which it proposes to authorise.

## 7. Air quality – Emissions and Dust

### East Suffolk Council Local Plan

- 7.1. Policy DM23: Residential Amenity, refers to the need to avoid adverse impacts on residential amenity arising from reduced air quality.
- 7.2. Policy SCLP10.3: Environmental Quality, clearly states the expectation that development proposals will protect the quality of the environment and minimise and, where possible, reduce all forms of pollution and contamination including air quality pollution.
- 7.3. Policy SCLP11.2: Residential Amenity, identifies air quality and other forms of pollution as a key consideration the local authority will take into consideration when assessing the impact of development.

### Key Local Issues

- 7.4. The main impacts on air quality are those associated with the construction phase and specifically dispersion of materials from the works areas into neighbouring communities and those associated with the emissions from construction vehicles, particularly heavy goods vehicles (HGVs).
- 7.5. The Stratford St Andrew Air Quality Management Area (AQMA) at Long Row, Main Road was declared in June 2014 following monitoring of the air quality in this area of the A12 which showed an exceedance of the annual mean nitrogen dioxide (NO<sub>2</sub>) Air Quality Objective (set at 40 µg/m<sup>3</sup>) at this location. The highest annual mean NO<sub>2</sub> concentrations within the AQMA were 44µg/m<sup>3</sup> recorded in 2015. The Air Quality Action Plan, required following declaration of any AQMA, received approval from the Department of Environment, Food and Rural Affairs (DEFRA) in March 2018 and consists of two short term priority action measures and six longer term aspirational measures. The main priority measure, movement of the 30/50mph change of speed limit further south out of the village was undertaken by Suffolk County Council in December 2017. NO<sub>2</sub> concentrations in the AQMA showed a decrease for the first time in 2016 and fell just below the objective in 2017 (39µg/m<sup>3</sup>), with a further reduction seen in 2018 (38µg/m<sup>3</sup>). The reduction of 1µg/m<sup>3</sup> following movement of the speed limit was lower than modelling had predicted. Speed surveys undertaken following the move have shown a reduction in speeds at all locations surveyed except on the southbound carriageway within the AQMA where speeds appear to have increased slightly. East Suffolk Council are continuing to monitor in this location and the Steering Group will be looking at the aspirational measures within the Action Plan.

- 7.6. Wind blow dust is also a concern locally by virtue of the light sandy soils. The development will result in long stretches of stockpiled topsoil which could be subject to wind whipping. Wind entrainment is commonly seen in the Suffolk Sandlings area and presents a risk to both residential and ecological receptors.

### **Adequacy of Application/DCO**

#### *Scope of Works*

- 7.7. The promotor's air quality assessment scope of works only includes the construction phase impacts upon dust nuisance (dust soiling on property and habitats) and air quality concentrations (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>). The following aspects have been scoped out:
- Dust nuisance generated during the operational phase;
  - Operational phase impact upon air quality concentrations, given the small number of vehicle trips generated;
  - Cumulative impacts of traffic upon air quality concentrations during the operational phase; and
  - The impact of shipping emissions upon local air quality.
- 7.8. The promotor has stated that *'it is not expected that maintenance of the onshore cable route or substation would lead to significant dust generation of fine particulates, as there would be no earthworks or ground disturbance'*. Additional nuisance may occur during the decommissioning phase, but a separate decommissioning assessment is a requirement. It has been demonstrated that scoping out dust nuisance during routine operational maintenance from this air quality assessment is reasonable.
- 7.9. There is no reference to the volumes of surface access traffic generated from port activities within the air quality assessment. Although in Chapter 26 (Traffic and Transport) it is stated that *"facilities would be provided or brought into operation by means of one or more planning applications or as port operations with permitted developments"*. The assessment of shipping emissions and surface access transport on air quality to ports should be secured through a requirement.
- 7.10. There are road improvements at the A12/A1094 junction, A1094/B1069 junction and Marlesford Bridge. Whilst some explanation has been provided for screening these out from assessment for dust nuisance, it does not fully justify screening out an assessment of re-routed traffic during the construction phase. Which is important as substantial works duration, typically those greater than six months, have the

potential to cause a material impact upon local air quality. The promotor's statement in paragraph 20 of Chapter 19 air quality assessment, that these works will not generate more HGV movements than those already assessed is reasonable. Although the impact of rerouted traffic and duration has not been assessed.

### *Application of Guidance within Assessment*

#### *Establishing Study Area*

- 7.11. Best practice guidance Design Manual for Roads and Bridges (DMRB) and Institute for Air Quality Management (IAQM)) has been used to identify roads which will experience a change in traffic flow which require a detailed air quality assessment. The promotor's transport consultant has used a Gravity model for the transport assessment, whilst this is acceptable for the transport assessment, this methodology does not capture the effects of varying journey times upon route choice and rerouting. Consequently, there are concerns that air quality impacts of existing traffic rerouted by EA1N and EA2 has not been captured. More specifically, displaced/rerouted vehicles going to/from the A12 along the B1119 and passing through Leiston and Saxmundham have not been assessed.
- 7.12. In addition, the air quality assessment mentions that traffic data has been taken from Chapter 26, Traffic and Transport. However, the peak construction phase annual average daily traffic flows presented within Table 26.23 of Chapter 26 are higher than those presented within Table 19.10 of Chapter 19. The reasonable worst-case traffic flows should be used from the transport assessment, at this point it appears that the project construction phase which generates a smaller volume of vehicles has been used. Using a different scenario's traffic data to identify roads for assessment could alter the study area.

#### *Assumptions for Emission Calculations*

- 7.13. The key guidance documents which should be used to develop assumptions for emission calculations are: Local Air Quality Management Technical Guidance 2016 (LAQM.TG (16)) and the IAQM Land Use and Management. These guidance documents have been considered within the promotor's assessment.
- 7.14. The essential assumption inputs for emission calculations are traffic flow, speed and fleet mix. The essential components are the volume % between light ( $\leq 3.5$  tonnes) and heavy ( $> 3.5$  tonnes), with optional extras on fleet mix improving confidence in calculations such as greater granularity in vehicle type with light vehicles being disaggregated into passenger cars, taxis, vans and their associated Euro standards.



- 7.15. 2023 is the assumed year for the air quality assessment. The choice of assessment year should be commended as an older assessment year will result in an older fleet mix with higher emissions assumed. Within IAQM it is stated that the first year of the proposed scheme going live should be assessed, the adopted approach is compliant. In theory, the combination of the earliest possible construction year with conservative emission assumptions and peak construction traffic will result in the most conservative assessment. Although given the mismatch between traffic flows presented within the air quality assessment and transport assessment, it is unclear whether this represents a worst-case assessment.
- 7.16. In the absence of speed data from a traffic model, the use of speeds from a survey and 20km/h for junctions which experience congestion is reasonable. The assumptions of 20km/h is a standard assumption recommended within LAQM.TG (16), therefore speed assumptions are compliant with best practice guidance.

#### *Dispersion Modelling Parameters*

- 7.17. The key guidance documents for dispersion modelling are LAQM.TG (16). This has been incorporated within the promotor's assessment.
- 7.18. Initial model verification; the process of comparing estimates with measured concentrations to review the need for model adjustment; showed that it met LAQM.TG (16) requirements. Although, further amendments were undertaken to better reflect heightened concentrations within Stratford St Andrew. To achieve this the promotor has created two model adjustment zones for locations within the Stratford St Andrew AQMA and those outside. This approach is considered acceptable to improve model performance. A years' worth of meteorological data was taken from the Wattisham weather station, it is agreed that this location is representative of the study area.

#### *Air Quality Assessment at Habitats*

- 7.19. Not all industry standard guidance has been used within the designated sites assessment. IAQM's Guide on the Assessment of air quality impacts at designated sites went live in June 2019. The promotor has captured relevant ecological receptors within their assessment such as; Leiston-Aldeburgh SSSI, Sizewell C Marshes and Sandlings SPA. With the assessment of nutrient nitrogen impacts from EA1N and EA2 in isolation and cumulatively assessed satisfactorily, impacts upon nutrient nitrogen are insignificant in isolation but require further consideration in the cumulative scenario. Chapter 22 provides a more detailed assessment of the >1% increase in

nutrient nitrogen deposition with satisfactory justification that sensitive habitats distance from emission source would cause insignificant impacts.

- 7.20. However, there are no results which show the estimated NO<sub>x</sub> concentrations at ecological receptors. This hinders any conclusions on whether there should be further assessment of acid deposition. In Chapter 22, it is mentioned that neutral grassland is the closest habitat to the affected area of Sizewell Marshes. Given that acid deposition has the potential to impact this habitat, further information needs to be presented to support the current position that air quality will have no adverse impacts upon habitats.

#### *Construction Dust Nuisance*

- 7.21. The main guidance document for construction dust nuisance assessment is IAQM's guidance on the assessment of dust from demolition and construction. The assessment follows best practice guidance. This guidance is excellent for most developments' construction programme, but this is a nationally significant infrastructure project where the magnitude of earthworks involved are substantially greater than most projects this guidance is intended for. Consequently, there are concerns that the standard mitigation measures within it would not be commensurate for this project's impacts.
- 7.22. Large impacts within the guidance are defined as those with an earthworks area > 10,000 m<sup>2</sup>, but Table 19.20 of Chapter 19 suggests the project is orders of magnitude greater than IAQM's large threshold. It is considered that construction dust nuisance impacts can be directly mitigated. However, these will need to go beyond standard mitigation measures within the guidance. This is a salient point given the high coastal winds and concerns regarding wind whipping, identified from previous consultations within paragraph 127 of Chapter 19.
- 7.23. The promotor has assessed the construction dust nuisance impact, but there is conflicting information on how soil stockpiles will be dealt with. The Code of Construction Practice (CoCP), for this chapter's purpose, establishes the construction management practices adopted to minimise impacts upon air quality concentrations and dust nuisance. Within chapter 8.1 Outline Code of Construction Practice (OCoCP) it is mentioned that soil stockpiles will be covered, seeded or fenced. Paragraph 127 of Chapter 19 only references seeding stockpiles. Seeding in isolation is not enough. These stockpiles should ideally be turfed, fenced or covered. If seeding is required, stockpiles should be fenced to prevent wind whipping during germination of seed. It would be preferable to have precise mitigation measures within the DCO. Although within paragraph 128 of Chapter 19, the requirement places emphasis upon agreeing

measures with the local authority, it is considered that these dust nuisance impacts can be directly mitigated post-consent through consultation with the Councils.

- 7.24. It is mentioned within the OCoCP document that hard surface haul routes will be implemented. However, it is unclear exactly where the haul routes will be positioned at this stage. Taking this on a worst-case basis and assuming impacts could occur from the onshore works boundary, onshore earthwork sections pass through Leiston-Aldeburgh SSSI and are close to residential areas. Given the level of detail submitted so far there are concerns regarding dust nuisance impacts, however these can also be directly mitigated with the Councils post-consent.
- 7.25. The review, management and reporting duties of the construction dust nuisance will place additional strains upon the Councils Environmental Protection team. In section 19.3.5, the promotor has mentioned they will agree any monitoring locations with the local planning authority (LPA) post-consent. This is satisfactory on the basis that enough funds are set aside to finance monitoring equipment and staff cost for the LPA.

#### *Assessment of Non-Road Mobile Machinery (NRMM) Emissions*

- 7.26. There is limited guidance on how to assess NRMM emissions, with LAQM.TG (16) being the main reference document. The inclusion of NRMM within air quality assessment is not prescriptive.
- 7.27. The guidance states '*in the vast majority of cases they will not need to be quantitatively assessed*'. This scheme could require considerably more NRMM than most construction projects and potential impacts should have been quantitatively assessed. Instead, monitoring and action plans for key sensitive receptors to establish if NRMM poses any exceedance risks could be agreed with the Councils within the OCoCP. Specific areas of concern for ecological receptors are the Leiston-Aldeburgh SSSI and for human health, residential areas in the following:
- Thorpeness;
  - Aldringham; and
  - Knodishall Common.

#### *Assessment of Significance*

- 7.28. The promotor has assessed the scheme impacts against the following guidance:
- NPS EN-1 (Department of Energy and Climate Change (DECC) 2011a); and
  - IAQM, Land-use Planning and Development Control: Planning for air quality.

- 7.29. The guidance for NPS EN-1 and IAQM has been fully incorporated within this assessment. It should be noted that conclusions of significance are not prescriptive within IAQM's guidance, instead they are based upon professional judgement.
- 7.30. Concentration of PM<sub>10</sub> and PM<sub>2.5</sub> from vehicular emissions are substantially below the air quality objectives, which is expected from this modelling study. Without particulate monitoring within Suffolk we are unable to establish if modelled concentrations are reasonable. However, funding towards PM<sub>10</sub> and PM<sub>2.5</sub> monitoring for dust nuisance impacts will also facilitate validation of these particulate concentration estimates. Consequently, these discussions will focus around NO<sub>2</sub>.
- 7.31. Table 19.24 within Chapter 19 estimates concentrations of 29.08 µg/m<sup>3</sup> with only one project's contributions to NO<sub>2</sub> concentrations. These concentrations seem very low, especially when compared to concentrations within Appendix 19.2, Table A19.6. Estimated concentrations at R1 are 10.36 µg/m<sup>3</sup> less with only one project's contributions compared to those with both EA1N and EA2. Instead the Councils interpretation of impacts is based upon results within Appendix 19.2.
- 7.32. It is unclear if the cumulative impact assessment of EA1N and EA2 of scenario 1 (simultaneous construction) includes both schemes' peak construction traffic contribution within the assessment. In paragraph 175, it is stated that *'it is not anticipated that additional traffic associated with Sizewell C New Nuclear Power Station would result in an exceedance of the air quality Objectives'*. However, estimated concentrations within Table A19.6 of Appendix 19.2 at R1 (within Stratford St Andrew) are 39.4 µg/m<sup>3</sup>, only 1.1 µg/m<sup>3</sup> below an exceedance of the annual mean NO<sub>2</sub> air quality objective. This is not sufficient headroom to accommodate cumulative schemes such as Sizewell B relocated facilities proposals and Sizewell C Early Year's contribution to NO<sub>2</sub>, if these applications are successful (Planning consent for Sizewell B to relocate facilities was granted on 13 November 2019 East Suffolk Council reference: DC/19/1637FUL). Whilst EA1N and EA2 are not exclusively responsible for the risk in achieving air quality objectives, the contribution of EA1N/EA2 to the cumulative effect of Sizewell B and Sizewell C construction traffic is a significant aspect of the risk.
- 7.33. Should EDF Energy's Sizewell C DCO application be successful, cumulative construction traffic impacts from EA1N/EA2 and Sizewell C pose a risk to achieving the NO<sub>2</sub> annual mean air quality objective within the Stratford St Andrew AQMA. This risk can be managed through monitoring of NO<sub>2</sub> concentrations within the AQMA and collaboration between the Councils, Nuclear New Builds (NNB (subsidiary of EDF Energy)) and SPR, a monitoring group could review concentrations and manage construction traffic in an attempt to prevent air quality objective exceedances. This

construction collaboration group should be secured through a requirement. The risk of exceedance is supported with the emission sensitivity test in appendix 19.4. This assumes no improvement in emissions will occur between 2018 and 2023.

- 7.34. Risks associated with schemes operating concurrently, could be exacerbated by any delays to the two-village bypass which is key in bypassing vehicles from the AQMA for Sizewell C. It is therefore essential that funding is set aside by the promotor and EDF Energy to finance operation of a continuous analyser within the AQMA to get early warnings of exceedance risks and to coordinate with SPR/EDF Energy to reduce emissions within the AQMA.
- 7.35. It is proposed that EA1N and EA2's contribution to NO<sub>x</sub> from construction vehicles will be reduced with the requirement that all vehicles will be Euro VI standard compliant. This is a commendable commitment by the promotor. There are concerns that these Euro standard ambitions will not be realised. The Oxford Brookes' study into Euro standards found that only 47% of HGVs achieved the target Euro standard (Impacts Assessment Unit, Oxford Brookes, 2019). Consequently, Euro VI standard for vehicles should be secured through a DCO requirement with sufficient contractual obligations put in place by SPR to enforce this standard across all tiers of contractors.
- 7.36. A key concern of the Councils is additional vehicles within this AQMA have the same emissions behaviour, that is a greater engine load from acceleration along the southbound lane with high emissions will be adopted by new vehicles. It is therefore crucial that funding is put aside to finance East Suffolk Council's efforts in achieving low emission driving behaviour through the AQMA.

#### *Summary*

- 7.37. Shipping emissions have been screened out from the air quality assessment. Instead Chapter 26 (Traffic and Transport) referenced separate planning applications or permitted development for port activity, consequently more detailed assessment of shipping emissions and impacts of ports' surface access upon air quality should be secured through a requirement. The transport chapter have also requested further assessment of surface access transport from port activities.
- 7.38. Construction dust nuisance impacts have been assessed with best practice guidance. However, this scheme has much greater nuisance potential than the schemes this guidance is intended for. Additional information should be presented within the mitigation section for a scheme of this scale. However, on the basis that funding is set aside for equipment and time to monitor construction and that the OCoCP is agreed with the Council post-consent, these impacts can be mitigated.

- 7.39. The estimated concentrations from one project presented in isolation seem surprisingly low, instead estimated concentrations within Appendix 19.2 have been used to reach conclusions on the risk of exceeding air quality objectives. Using these results mean construction of either one project only, or EA1N/EA2 simultaneously, poses an exceedance risk with the cumulative effects of Sizewell B and Sizewell C early years traffic.
- 7.40. Should EDF Energy's Sizewell C DCO application be successful, cumulative construction traffic impacts from EA1N/EA2 and Sizewell C pose a risk to achieving the NO<sub>2</sub> annual mean air quality objective within the Stratford St Andrew AQMA. This risk can be managed through monitoring of NO<sub>2</sub> concentrations within the AQMA and collaboration between the Councils, Nuclear New Builds (NNB (subsidiary of EDF Energy)) and SPR, a monitoring group could review concentrations and manage construction traffic in an attempt to prevent air quality objective exceedances. A requirement is recommended to ensure a monitoring group proactively manages construction traffic to minimise exceedance risks.
- 7.41. Other requirements and funding are required for more effective enforcement of Euro VI standards within construction vehicles and low emission driving behaviour to minimise the risk of NO<sub>2</sub> annual mean exceedance within Stratford St Andrew.

#### Compliance with Local Policy

- 7.42. The assessment has mostly been undertaken in accordance with best practice guidance. Relevant local policies have been considered within the assessment. With reference to Policies DM23 and SCLP10.3, the promotor's assessment shows that there is a risk of adverse impacts to residential amenity and environmental quality. However, additional information to demonstrate that adverse impacts have been completely mitigated and managed is required. Until we have that detail the proposals are not considered to be compliant with local policy.

## **8. External Lighting**

### **East Suffolk Local Plan Policies**

- 8.1. Policy DM23: Residential Amenity, refers to the need to avoid adverse impacts on residential amenity arising from light pollution.
- 8.2. Policy SCLP10.3: Environmental Quality, clearly states the expectation that development proposals will protect the quality of the environment and minimise and, where possible, reduce all forms of pollution and contamination including light pollution.
- 8.3. Policy SCLP10.4: Landscape Character, states that development should protect and enhance the tranquillity and dark skies across the District. Highlighting that exterior lighting in development should be appropriate and sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heathland and river valley landscape character.

### **Key Local Issues**

- 8.4. The onshore cable corridor is routed through rural areas which benefit from dark skies with little intrusion from light sources. Any lighting during construction and at the substation during both construction and operation has the potential to cause light pollution and appear intrusive in this rural dark locality.

### **Adequacy of Application/DCO**

- 8.5. Within Chapter 6 it is stated that no 24-hour lighting is anticipated along the length of the cable route except associated with any Horizontal Directional Drilling (HDD) operations and security lighting at the Construction Consolidation Sites (CCS). Requirement 22 of the DCO which secures the CoCP stipulates that the document must include an artificial light emissions plan. The OCoCP states that the management plan will detail appropriate management and mitigation measures. The documents detail how the lighting will be carefully designed to avoid or minimise impact on both human and ecological receptors.
- 8.6. Chapter 6 identifies a need for security lighting around the perimeter fence of the substation compounds in addition to car park lighting. This lighting is identified to potentially be motion sensitive. The submission makes it clear that no additional lighting will be proposed along Grove Road or along the access roads within the substation location. Requirement 25 of the DCO controls artificial lighting during the

operational phase of the development by securing the submission of an artificial light emissions management plan in relation to the project substation or National Grid substation prior to their operation.

*Compliance with Local Policy*

- 8.7. Subject to the artificial lighting schemes for both the construction phase and operational phase of the development being detailed appropriately, the proposals would be compliant with local policy. It will however be crucial that the lighting schemes recognise the rural nature of the site and the existing limited intrusion from external lighting.



## 9. Ecology and Ornithology

### East Suffolk Local Plan Policies

- 9.1. Policy DM27: Biodiversity and Geodiversity, requires protection and enhancement of habitats and their biodiversity value. Adverse impacts on protected/priority species will not be permitted unless adequate mitigation and/or compensation is provided. There is emphasis on minimising habitat fragmentation and maximising opportunities for habitat connectivity.
- 9.2. Policy SCLP10.1: Biodiversity and Geodiversity, states that development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. Proposals which result in direct or indirect adverse impact alone or in combination with other projects, on locally designated sites, will not be supported unless it can be demonstrated that the benefits of the proposal outweigh the biodiversity loss. The policy also makes it clear that new development should provide environmental net gains in terms of both green infrastructure and biodiversity. Development with the potential to affect a European designated site must be supported by sufficient information to enable a Habitat Regulations Assessment (HRA) to be undertaken.

### Other Relevant Local Policy

- 9.3. The Suffolk Coast and Heaths AONB Management Plan 2018-2023 sets out the intention to conserve and enhance the landscape including biodiversity, noting the specific importance of habitat connectivity in responding to climate change.

### Key Local Issues

- 9.4. The proposed development has the potential to result in a range of adverse impacts on a number of ecological receptors, including sites of international nature conservation importance; sites of national conservation importance; protected species and species and habitats of UK conservation priority (species and habitats identified as UK Priority under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). Designated sites which the development interacts with and which are of particular importance are the Sandlings SPA (site of international importance); Leiston-Aldeburgh SSSI (site of national importance) and Grove Wood County Wildlife Site (CWS) (site of at least county importance). Several UK Priority habitats will be affected, including hedgerows, lowland mixed deciduous woodland, rivers and coastal vegetated shingle. A number of protected and/or UK

Priority species are also likely to be affected, including bats (protected species; some UK Priority species; all Suffolk Priority species); great crested newts (protected species; UK Priority species); breeding birds (protected species; some UK Priority species); reptiles (protected species; UK Priority species) and badgers (protected species). There is also the potential that migratory species, such as wildfowl, waders and bats, may be impacted by the operation of the turbines.

9.5. The following construction elements of the development have the potential to impact on the ecological receptors identified above:

- Landfall – damage to, and disturbance of, Leiston-Aldeburgh SSSI as a result of HDD;
- Cable route – disturbance of Sandlings SPA/Leiston-Aldeburgh SSSI due to construction proximity;
- Cable route – damage to, and disturbance of, Sandlings SPA-Leiston-Aldeburgh SSSI during construction (where cable route crosses designated sites);
- Cable route and substations – loss of hedgerows and trees during construction. Impacts on bat roosting; foraging and commuting habitats; great crested newt habitats; reptile habitats; breeding bird habitats and badger habitats (including setts).
- Cable route and substations – loss of woodland and trees during construction. Impacts on bat roosting; foraging and commuting habitats; great crested newt habitats; reptile habitats; breeding bird habitats and badger habitats (including setts).
- Cable route and highways improvements – damage to, and disturbance of, watercourse during construction. Impacts on bat foraging and commuting habitats; great crested newt habitats; reptile habitats; breeding bird habitats; badger habitats; otter and water vole habitats and eels.

9.6. The following operational elements of the development have the potential to impact on the ecological receptors identified above:

- Substation noise – disturbance of protected and/or UK Priority species (particularly bats) due to operational noise of the proposed substations.
- Migratory species – turbines could result in killing or injury of migratory species such as wildfowl, waders and some bat species.
- Whole project Biodiversity Net Gain – in all developments the Councils seek the delivery of Biodiversity Net Gain and are disappointed to see that little is proposed as part of this development.

## **Adequacy of Application/DCO**

- 9.7. Subject to the comments above, whilst it is considered that the ES Chapters 22 (Onshore Ecology) and 23 (Onshore Ornithology) adequately assess and provide mitigation/compensation measures for County Wildlife Sites; watercourses; great crested newts; reptiles; non-SPA/SSSI breeding birds and badgers, the following ecological receptors are either not considered to have been fully assessed or have insufficient mitigation/compensation measures identified within the ES and secured within the draft DCO:

### *Cable route (construction) crossing the Sandlings SPA/Leiston-Aldeburgh SSSI*

- 9.8. The ES (Chapters 22 and 23) identifies two potential techniques for use where the cable route crosses the Sandlings SPA and Leiston-Aldeburgh SSSI, to the south of Sizewell Gap. Either open cut trenching or HDD are proposed for use. Whilst it appears that open cut trenching is the promotor's preferred method (ES Chapter 22, Table 22.4), neither technique is definitively selected. Whilst both have the potential for adverse impacts on the designated sites, based on the information available the Councils would at present support the proposed open cut trenching method as the preferred option as it is considered that on balance this will result in the least adverse ecological impact due to the reduced working time (decreasing likely disturbance impacts), minimised working width and potential to reinstate any habitats impacted upon. Open cut would also appear likely to result less disturbance impacts in the surrounding area compared with HDD. This is subject to an acceptable method statement for this part of the construction being agreed by Natural England, the Council and other relevant stakeholders.

### *Cable route and substations (construction) impacts on bats*

- 9.9. The ES Chapter 22 identifies that the loss of habitat suitable for bat foraging and commuting (primarily hedgerows and areas of woodland) would result in a "moderate adverse" impact on this receptor in the "short term" after mitigation measures have been applied (22.6.1.9.3). The Councils have significant concerns about the magnitude of this residual impact and are disappointed that additional measures have not been investigated to address it.
- 9.10. The Councils are also concerned that the length of the impact has been under assessed. If the proposed replacement planting does not proceed as planned or does not develop as quickly as anticipated (see our comments in Section 15 on landscaping for further information on our concerns about this) a minimum of a "medium term" impact will occur. This could then lead to impacts on local bat populations as the

length of the works and lack of mitigation/compensation will have potentially resulted in less food availability (e.g. by severance of connections to feeding areas) which in turn will result in poorer breeding success and population declines.

- 9.11. There is an assumption that destroyed, damaged or disturbed hedgerows will be ecologically functioning features again in a period of three to seven years from the start of construction. This is considered to be optimistic and is dependent on good growing conditions being experienced in all years. Given the varying “quality” of growing seasons experienced in Suffolk in recent years a longer period to achieve ecological functionality may be experienced.
- 9.12. Finally, survey work has identified the apparent presence of lesser horseshoe bat (*Rhinolophus hipposideros*) (a European Protected Species listed on Annex II and Annex IV of the Habitats Directive). This species has never been recorded in East Suffolk, with the only known record being from the west of the County, with its UK range being largely restricted to the south-west. Given the recording of this species (alongside a suite of other bat species including barbastelle (*Barbastella barbastellus*) which is also listed on Annex II and Annex IV of the Habitats Directive) it is essential that adequate mitigation and compensation measures are delivered.

*Cable route and substations (construction) impacts on hedgerows*

- 9.13. In addition to the above comments on bats, the ES concludes that impacts on hedgerows (a UK Priority habitat) is “Minor Adverse” subject to the proposed mitigation measures being implemented (22.6.1.5.2). As set out in the Councils comments on landscape, we have significant concerns about the likely speed and success of the planting mitigation proposed. There is therefore the potential that the identified effect could be present over a greater length of time and therefore be greater than that predicted.
- 9.14. We also note that the ES chapter only references that hedgerow mitigation plans will be agreed with Natural England; however, we welcome the commitment in the draft DCO that such plans will also be agreed with East Suffolk Council.

*Cable route and substations (construction) impacts on woodland and trees*

- 9.15. The ES concludes that with the proposed mitigation impacts on woodland and trees will be reduced to a temporary residual “Minor Adverse” (22.6.1.4.3). However, as set out in the Councils comments in Section 15 on landscape we have concerns about the growth rates proposed. If the proposed growth rates are not achieved then the ecological functionality of the replacement planting will take longer to be achieved

and therefore the identified residual impact will be in effect for longer, thus potentially increasing it from “Minor Adverse”.

- 9.16. Also, as with hedgerows, we note that the ES chapter only references that woodland and tree mitigation plans will be agreed with Natural England, however we welcome the commitment in the draft DCO that such plans will also be agreed with East Suffolk Council. Further, it is proposed that only “...at least an equivalent area of lost woodland is replanted...” (22.6.1.4 190). Whilst this will provide compensation at a spatial scale, it will not necessarily deliver an equivalent quality of habitat, nor will it allow for the decline in habitat quality which will be experienced whilst new planting matures.

*Air quality (construction)*

- 9.17. As set out in our comments in the Air Quality section of this report, whilst impacts from nitrogen deposition on designated sites are assessed, it is not clear that impacts from acid deposition arising from NO<sub>x</sub> emissions have been fully assessed. Habitats within nearby designated sites (including Sizewell Marshes SSSI) are potentially vulnerable to acid deposition. Further information is therefore required to demonstrate that there will be no adverse impacts on habitats within designated sites.

*Substation noise (operation)*

- 9.18. The ES chapter concludes that operational noise will at worst result in a “Minor Adverse” ecological impact (22.6.2.2 251). However, this appears to be based on assessment undertaken in relation to human noise receptors. Whilst we have a number of concerns in relation to the assessment of impacts on human noise receptors (please see comments within Section 19 Noise and Vibrations), using the results of assessment for impacts on human receptors is not directly comparable as high frequency noise is not directly assessed. This has significant ramifications for a range of ecological receptors, particularly bats (protected species; some UK Priority Species) which rely on echolocation (using high frequencies) for foraging, commuting and socialising.

*Whole project Biodiversity Net Gain*

- 9.19. The Councils are disappointed that little in the way of Biodiversity Net Gain is proposed as part of the development. Policy SCLP10.1 seeks to ensure new development secures ecological enhancements as part of its design and

implementation and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal.

*Pre-commencement surveys*

- 9.20. The Outline Landscape and Ecological Management Strategy (OLEMS) recognises the need for further pre-commencement surveys, however we do not consider that the need for these is adequately reflected in the wording of the draft DCO. DCO Requirement 21 should specifically reference the need for pre-commencement surveys prior to the commencement of any of the onshore works (including site preparation works).

*Cumulative Impacts*

- 9.21. The Councils agree that, in relation to cumulative impact, Scenario 2 is likely to result in greatest ecological harm (ES Volume 3, Appendix 22.2).

*Compliance with Local Policy*

- 9.22. A number of ecological receptors have been identified above which the Councils consider the promotor has either not fully assessed or proposed insufficient mitigation measures to address the impacts contrary to the requirements of local policy. The lack of commitment to biodiversity net gain also conflicts with emerging local policy.

## 10. Coastal change

### East Suffolk Council Local Plan Policies

- 10.1. Policy SP30: Coastal Zone, seeks an integrated approach to considering development on the coast having regard to the adopted Strategic Flood Risk Assessment, the SMP and any Estuarine Plans endorsed by the District Council.
- 10.2. Policy SCLP9.3: Coastal Change Management Areas, seeks to highlight areas where the rates of shoreline change are significant over the next 100 years. Although there is a presumption against some forms of development, essential infrastructure will be permitted where no other sites outside the area are feasible and there is a management plan in place to manage the impact of coastal change including their future removal and replacement. The point at which the offshore cables come ashore lies within a Coastal Change Management Area.

### Other Relevant Local Policy

- 10.3. The landfall zone is within Policy Development Zone 4 (Dunwich to Thorpeness) of the SMP 7. It spans 2 Management Units (MU) MIN 13.2 and MIN13.3. The policy statements for each are shown in the table below.

SMP MU	1 <sup>st</sup> epoch until 2025	2 <sup>nd</sup> epoch 2025-2055	3 <sup>rd</sup> epoch 2055-2105
MIN 13.2	No Active Intervention	No Active Intervention	No Active Intervention
MIN 13.3	Managed Realignment with the current alignment maintained at existing defences.	Managed Realignment with review of maintaining the current alignment at existing defences.	Managed Realignment

- 10.4. In MU MIN 13.3 the intent to 'manage realignment' applies only to the currently defended part of the frontage below property in North End Avenue that is outside the landfall zone. There is no intention to actively manage the part of MU MIN 13.3 north of the existing defences that is within the landfall zone.
- 10.5. The policy headlines above provide brief summaries of the underlying Intent for Management for sections of coastline which are described in detail in the SMP documents. Over this locality the underlying policy objective is to manage the coast in a fashion that maintains a process of long-term natural change and for the built environment to adapt to that change. This Intent for Management is a key guiding principle that is reflected in the Council's issues and objectives that follow.

## **Key local issues**

### *Coralline Crag Outcrop*

- 10.6. It is important to ensure that the permanent installation and temporary works required to both install and maintain the cable landing, do not cause a significant negative impact on coastal processes. The main point of concern is the potential for significant damage to be caused to the exposed coralline crag outcrop located in the nearshore area between Thorpeness and Sizewell that has an important role in stabilising the coastline over the Thorpeness to Dunwich frontage.

### *Exposure of Structures*

- 10.7. The proposed structures (ducts, cables and buildings) required to be installed at or close to the shoreline (defined here as cliff top to Mean Low Water Mark) must be designed with a full understanding of the consequences of coastal change. It is important to ensure the proposed structures are not exposed by coastal change within their predicted service life, with an allowance for risk if the service life is extended.

### *Destabilisation of Cliff*

- 10.8. It is important that the cable and duct installation methods minimise disturbance to the shoreline. The objective is to encourage the use of HDD as opposed to open cut trenching. A further concern is the potential for HDD to cause vibration that destabilises the cliff face that it passes under. The local community has also raised questions and concerns regarding the potential impacts of the cable landing site linked to its location close to the northern extent of Thorpeness village. The Thorpeness frontage has suffered significant coastal erosion pressure over recent years. The community are similarly concerned regarding the drilling under the currently near-vertical and unstable Thorpeness cliff will cause vibration leading to increased cliff erosion and the fact the cable landing infrastructure in this location will be at risk from coastal erosion.

### *Cumulative Impacts*

- 10.9. It must be ensured that the site-specific and cumulative effect of the offshore windfarm array on coastal processes does not create a significant negative impact at the shoreline.



## **Adequacy of application/DCO**

### *Coralline Crag*

- 10.10. The Council's concerns in relation to the project's interaction with the coralline crag outcrop were addressed by SPR in a report that assessed several potential cable landing locations. The report concluded that the landing site should be at the southern extent of the coastal frontage within which it is allowed, which will avoid, or minimise to an acceptably low level, any negative impact on the crag outcrop notably from open cut trenching.
- 10.11. This has been agreed in principle by the promotor however the final cable HDD line, break out location and transition bay location is subject to the outcome of a further site investigation of the plan extent of, and thickness of sand coverage over, the southern coralline crag outcrop. The final plan position of the HDD line and breakout point and transition bay locations are to be agreed with East Suffolk Council based upon data from further site investigation. There is however no specific reference to this within the requirements.
- 10.12. In order to address this, it is recommended that additional text is required, or the existing text is expanded to include a requirement for the promotor to consult with East Suffolk Council on design after further investigation is carried out and for East Suffolk Council to approve the final design proposal.

### *Exposure and Decommissioning of Structures*

- 10.13. The Councils' concerns regarding the potential exposure of the proposed structures installed close to the shoreline were partly addressed by SPR in a report that assessed potential future coastal change scenarios. This has been used to identify a sustainable location for the transition bay building and will be used to design the duct installation profile. An outstanding task is for SPR to present a final design profile for the cable duct and transition bay installation that demonstrates compliance with this objective. This is linked to the recommendation set out in the previous paragraph.
- 10.14. The final design profile for the cable duct is to be agreed with East Suffolk Council to demonstrate that when installed, the infrastructure is not at risk of exposure from coastal change within the predicted service life. This must take account of tolerances in HDD techniques. This will follow on from action for further site investigation described the section on the coralline crag above.

- 10.15. A further recommendation is that the proposed structures (excluding ducts) are removed at the end of the landfall site design life (25 years following completion of construction), and that any proposed extension of the design life beyond 25 years is subject to a new erosion risk assessment and there being evidence of no significant negative impact of such an extension on coastal processes. To achieve these objectives an amendment to Requirement 30-(1) Onshore Commissioning is required to include Work nr 8 and (b) a requirement for the developer to consider the risk of erosion to the Landfall structures if there is request to extend the operational life beyond 25 years. This is secured by Requirement 37-(1) Decommissioning of Work nr 8.

#### *Destabilisation of Cliff*

- 10.16. HDD has been agreed by SPR as the preferred method of duct installation at the landfall. The promotor's approach to management of vibration risk to the cliff stability is not yet agreed. The HDD shall be designed and managed to ensure the risk to cliff stability from vibration, or other cause linked to HDD, is as low as reasonably practical. Requirement 22 makes general reference to vibration management requiring a construction phase noise and vibration management plan as part of the CoCP, but more specific text is required to ensure the issue in relation to vibrations and the stability of the cliffs is addressed.

#### *Cumulative Impacts*

- 10.17. The Councils are satisfied the site-specific and cumulative effect of the offshore windfarm array on coastal processes has been adequately addressed by SPR studies that demonstrate the worst-case potential change scenario is unlikely to produce a significant negative impact.
- 10.18. The Councils believe that the risk of a cumulative impact will increase as the number and extent of windfarms in the North Sea increases and recommends the assumption of no significant negative impact be kept under review as part of a post-installation strategic windfarm impact monitoring programme.

#### *Summary*

- 10.19. When measured against the overarching policy objectives for Coastal Change management the potential impacts of the current development are negative to neutral in that they may alter natural change. There are no positive impacts. The scale and significance of the potential negative impacts varies from low to negligible when put into context of the potential for variability in natural environmental change.

## 11. Flood Risk

### East Suffolk Local Plan Policies

- 11.1. Policy DM28: Flood Risk, states that development is not permitted in flood zones 2 and 3 unless relevant tests in the Technical Guidance to the NPPF have been complied with. This includes the sequential test, exceptions test (as necessary) and site-specific flood risk assessment.
- 11.2. Policy SCLP9.5: Flood Risk, states proposals for new development will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (NPPG). The policy emphasises that developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere.
- 11.3. Policy SCLP9.6: Sustainable Drainage Systems (SuDS), requires this development to utilise sustainable drainage systems which should be integrated into the landscaping scheme, contribute to the design quality of the scheme and deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. The policy states runoff rates should be restricted to greenfield runoff rates wherever possible.

### Other Relevant Local Policy

- 11.4. The Suffolk Flood Risk Management Strategy (SFRMS) sets out guiding principles on tackling flooding and integrates the issue of flooding from surface water runoff and from ordinary watercourses. One of the key objectives is to prevent an increase in flooding as a result of new development by ensuring SuDS are properly considered and incorporated into works. The document notes the importance of aligning with the content of SMPs and River Basin Management Plans to ensure a holistic approach is taken to flood and coastal management and water quality. Appendix A of the Strategy is a local SuDS guide.
- 11.5. SFRMS Objective 3 states *“Ensure that planning decisions are based on up-to-date information about all flood risks”*.

## Key Local Issues

### *Surface water flooding in Friston*

- 11.6. A key issue for the Councils and communities relates to the cable corridor, substations site and implications for flood risk in the locality. Friston village has been subject to surface water flooding on several occasions, most recently on 6 October 2019 when water internally flooded a number of properties, with one property being internally flooded on a second occasion, 21 October 2019. An up to date Flood Incident Map for Friston is provided in Plan A which can be found at the end of this section of the report.
- 11.7. Suffolk County Council as Lead Local Flood Authority (LLFA) are currently conducting two Section 19 Investigations in Friston under the Flood & Water Management Act 2010;
- Multiple properties flooded internally on 06/10/2019.
  - Single property flooded on multiple occasions.
- 11.8. Rainfall data from nearby Thorpeness identified the event on 6 October 2019 as a 1 in 40-year rainfall event.
- 11.9. Evidence suggests recent surface water flooding originated from farmland to the west, east and north east of Friston, an area through which the cable corridor is proposed to pass. The surface water flooding was heavily laden with silt from these fields. Surface water flooding is not thought to have originated from the proposed substation site on this event.
- 11.10. Existing Environment Agency (EA) National Mapping for surface water flood risk (Figure 1) is not representative of the surface water flow paths which resulted in the internal flooding of properties in October 2019, as above. The properties affected are shown at low surface water flood risk (1 in 1000). Plan B illustrates the flow paths observed on 6 October 2019 which can be found at the end of this section of the report.
- 11.11. There is the potential for the proposed development to interact with an unidentified surface water flow path. In this instance, the construction drainage may not be sufficiently sized to manage the unknown volume of water within the red line boundary. As such, this could result in an increase in offsite flood risk and an increase in the volume of sediment contained within surface water flood flows.



Figure 1 – Environment Agency National Mapping, Surface Water Flood Risk, Friston

- 11.12. EA National Mapping, shown in Figure 2, identifies the surface water flood risk in Friston originating to the north of the village, in the area proposed to be occupied by the National Grid substation.
- 11.13. The promotor proposes a SuDS pond to intercept this flow path, attenuate and release at a reduced rate. This would reduce surface water flood risk in Friston. However, it is unclear how this significant flow path would be managed during construction. The area required to attenuate it would be significant. Unless the SuDS pond is established prior to construction, this flow path could interact with construction activities and increase the amount of sediment mobilised and transported downstream.
- 11.14. Suffolk County Council are in the process of developing a Surface Water Management Plan (SWMP) for the catchment of Friston village. This will include a detailed assessment of the catchment topography and characteristics to accurately model

surface water flow paths which can in turn be compared against evidence from recent surface water flooding to increase confidence in the SWMP.

- 11.15. Friston village is part of the Friston Watercourse Catchment. However, it is in the upper reaches of the catchment. Thus, due to the local topography, the proposed development impacts on Friston are far more concentrated in Friston village than the impacts downstream where the entire contributing catchment of 6km<sup>2</sup> is considered. As an estimate Friston village has a contributing catchment of approx. 3km<sup>2</sup> with the catchment of the open section of Main River in Friston being even less than this.
- 11.16. CCSs are proposed within the Friston Catchment. The promotor's submission states these will not have their own SuDS ponds. It is therefore unclear if the proposal is not to drain these sites, which would result in an increase in surface water flood risk to Friston, or if they will drain into the strategic surface water drainage system.
- 11.17. Due to the nature of the works there is a risk of ground water flooding in areas of excavation, specific areas of concerns are around Coldfair Green and Aldringham.

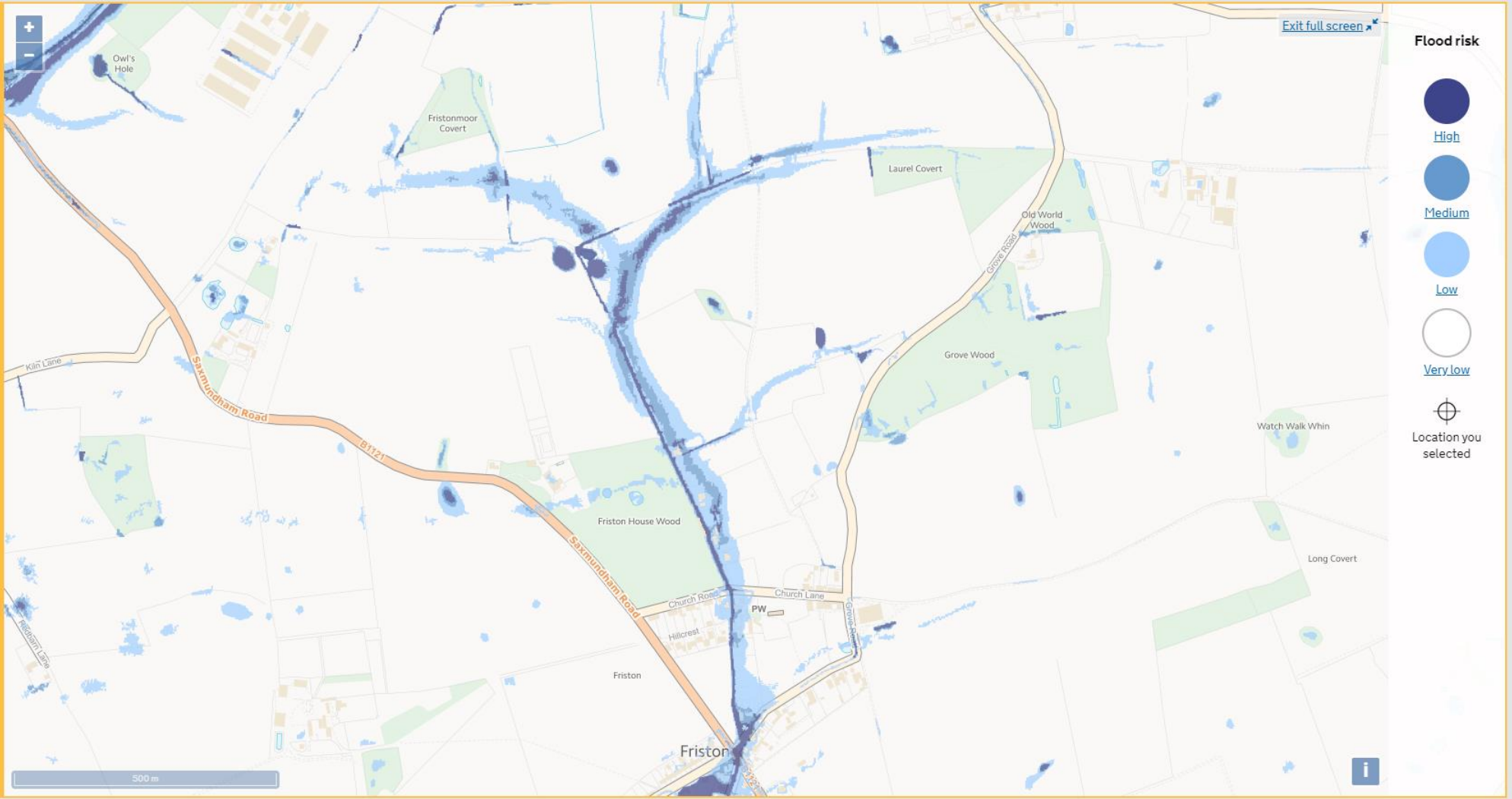


Figure 2 – Environment Agency National Mapping, surface water flood risk, North of Friston

### Adequacy of Application/DCO

- 11.18. The draft DCO has no explicit requirements for the submission of a permanent surface water drainage strategy in relation to the onshore substations. Reference is made within the OLEMS which would be split into two documents and secured via Requirements 14 and 21, but this is not very clear.
- 11.19. Requirement 22 ensures a surface water and drainage management plan must be submitted for each stage of construction works prior to commencement. The principles contained within the OCoCP are generally acceptable to manage surface water flood risk during construction, although greater reference could be made to the prioritisation of open SuDS, as per local policy. However, some of the details contained within the OCoCP require further clarification;
1. The document contains some contradictory statements regarding the storage of materials within the vicinity of watercourses (Paras 38 & 102);
  2. OCoCP Paragraph 106 states *“the controlled runoff rate will be at least the equivalent to the greenfield runoff rate”*. This should read “at most”. Runoff rates must not exceed greenfield runoff rates, as per local policy; and
  3. OCoCP Paragraph 108 details how surface water flow paths (identified or otherwise) intercepted by the development would be dealt with. However, there is no demonstration that these volumes could be contained and managed within the red line boundary using open SuDS, as per local policy, without increasing off site flood risk or pollution.
- 11.20. The promotor has, through the production of a Flood Risk Assessment (FRA) for the proposed development (ES Volume 3, Chapter 20, Appendix 20.3), satisfied the policy requirements of the Local Plan. Whilst the FRA satisfies policy requirements, we query the level of confidence that can be assigned to the assessment of surface water flood risk in the Friston Watercourse Catchment.
- 11.21. The application does not consider recent surface water flooding in Friston, contrary to local policy.
- 11.22. The FRA proposes to comply with the surface water disposal hierarchy. However, no infiltration testing has been undertaken within the red line boundary. This is contrary to local policy. A review of publicly available information suggests infiltration may not be feasible. In this instance, a discharge to the Main River in Friston is proposed, however the engineering feasibility of this has not been assessed and is a concern.
- 11.23. The principles of surface water drainage for the cable corridor and substation sites during construction and operation have been outlined in Volume 1, Chapter 20.



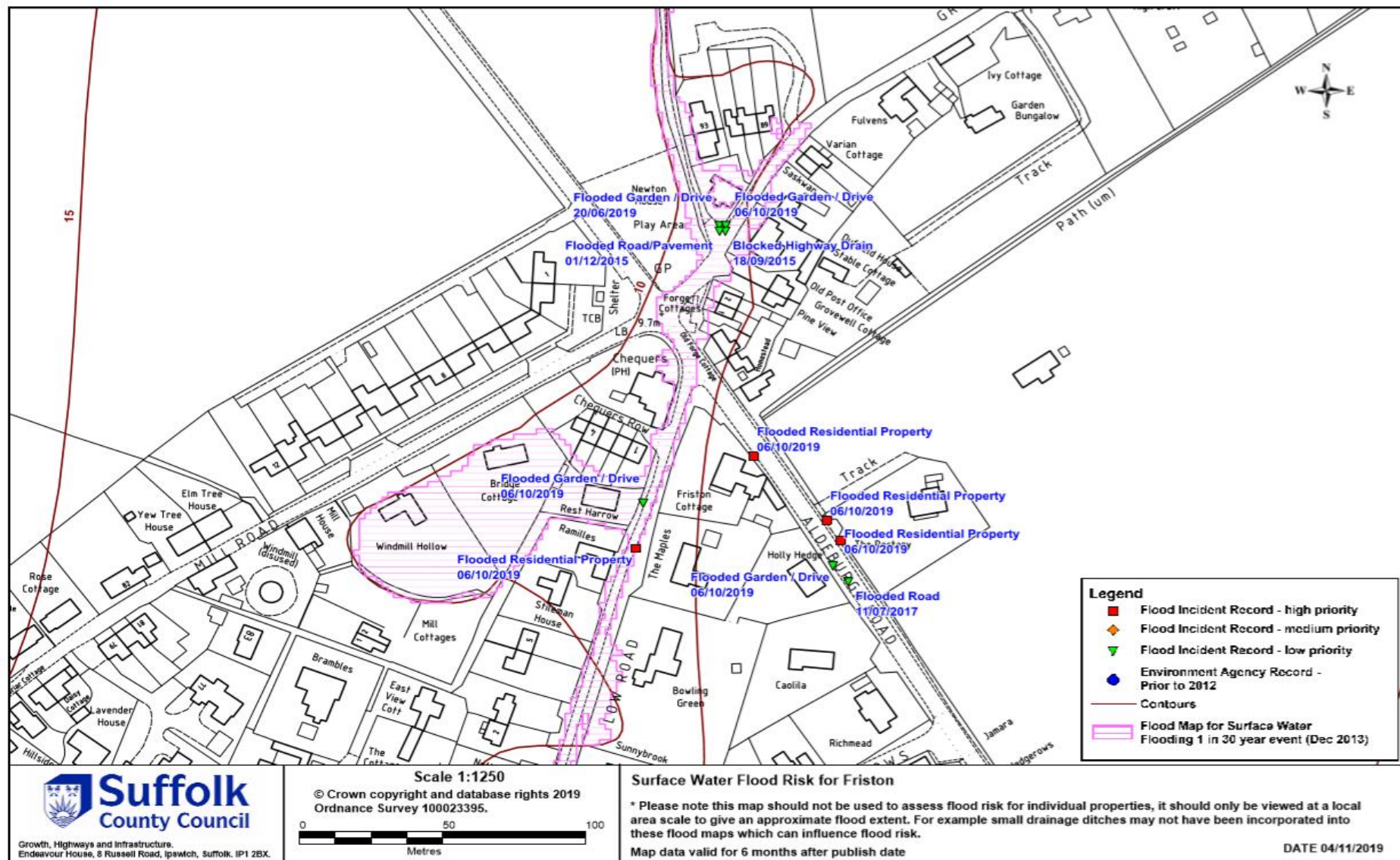
However, it has not been demonstrated this is achievable within the red line boundary, prioritising the use of SuDS. The sizing of the SuDS is assumed to be based on design assumptions that are not stated within the application and have not been agreed with Suffolk County Council as the Lead Local Flood Authority. This is contrary to local policy.

- 11.24. Despite not having a date for decommissioning the proposed development, the application only applies an increase in rainfall intensity due to climate change of 20%. This is appropriate for developments expected to be present until 2069. Given there is no commitment to remove the proposed impermeable areas prior to 2069, a rainfall intensity increase of 40% should be applied, in line with the principles of the Rochdale Envelope.
- 11.25. Volume 1, Chapter 5 states that a confidence value will be assigned to each assessment once undertaken. None of the assessments made under Volume 1, Chapter 20 have been assigned confidence values. Confidence has only been assigned to data sources.
- 11.26. ES Volume 1, Chapter 20 does not consider the Human Environment. Specifically, no consideration is given to the impacts on the residents of Friston as a receptor to an increase in surface water flood risk or the inter-relationship between an increase in sediment supply and an increase in surface water flood risk.
- 11.27. The impact of an increase in sediment supply does not consider the inter-relationship with and subsequent increase in surface water flood risk due to the reduction of channel and culvert capacity due to siltation. The impact of this in the upper reaches of the Friston Watercourse Catchment, particularly in Friston village, could be greater if the residents of Friston were considered as a receptor.

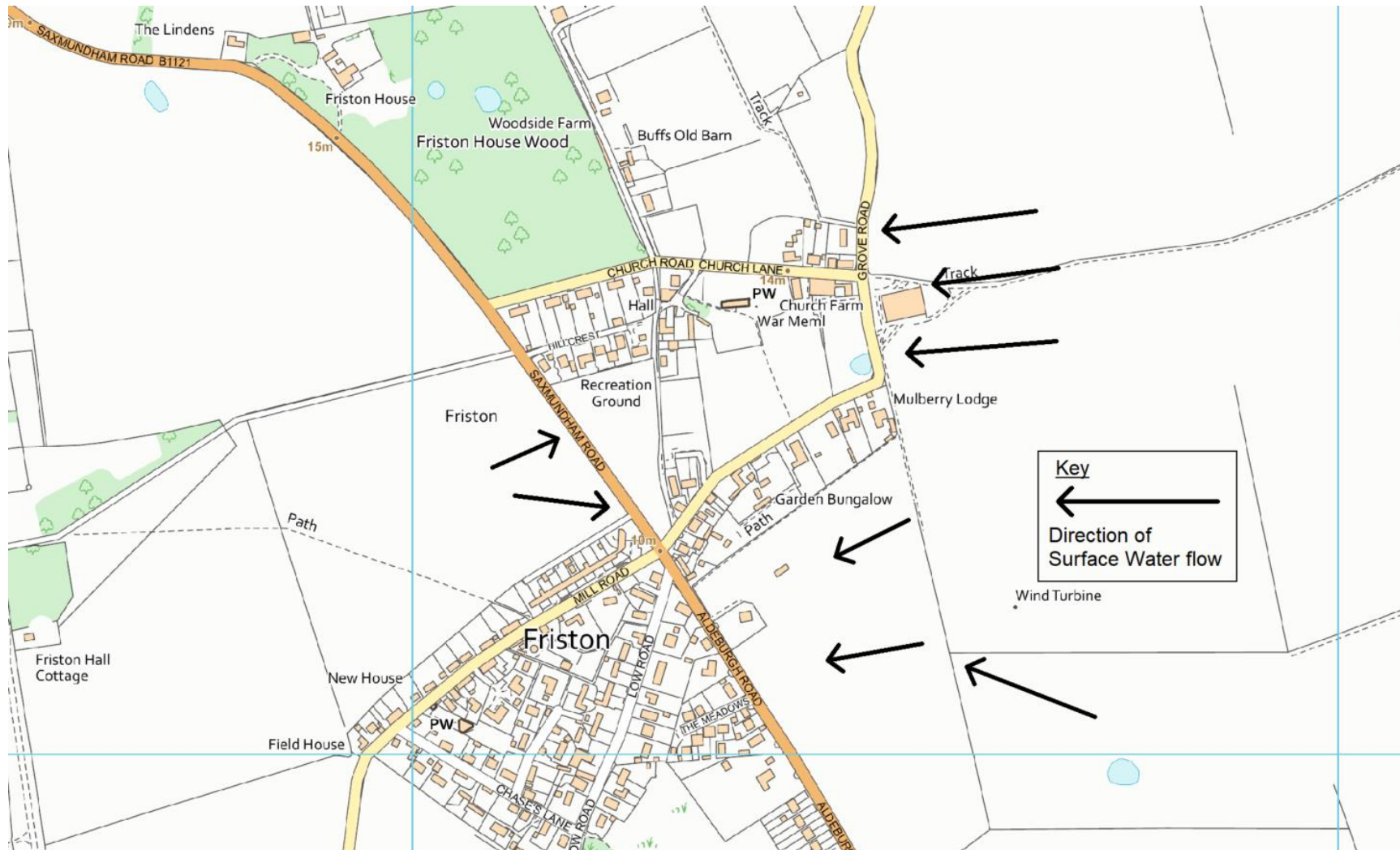
*Compliance with Local Policy*

- 11.28. The proposal based on the information currently available is not considered compliant with local policy for the reasons set out above.

Plan A – 04/11/2019 Flood Incident Map



Plan B – 06/10/2019 Direction of surface water flows



## **12. Built Heritage**

### **East Suffolk Council Local Plan Policies**

- 12.1. Policy DM21: Design: Aesthetics, requires that the design of any development should have regard to the need to protect existing features that have a heritage value and that where possible such features should be enhanced.
- 12.2. Policy SCLP11.3: Historic Environment, promotes the conservation and enhancement of the historic environment. The policy requires all development which has the potential to impact on historic assets or their settings is supported by a Heritage Impact Assessment and/or an Archaeological Assessment.
- 12.3. Policy SCLP11.4: Listed Buildings, details a clear set of criteria which must be met if development which affects the setting of listed buildings is to be supported. These include the need to demonstrate a clear understanding of the significance of the building and/or its setting alongside an assessment of the potential impact of the proposal on that significance.
- 12.4. Policy SCLP11.5: Conservation Areas, states that development which has the potential to affect the setting of conservation areas will be assessed against the relevant Conservation Areas Appraisals and Management Plans.
- 12.5. Policy SCLP11.6: Non-Designated Heritage Assets, identifies that new uses which result in harm to a Non-Designated Heritage Asset or its setting will be considered based on the wider balance of the scale of any harm or loss.

### **Other Relevant Policies**

- 12.6. The Conservation Area Appraisals for Aldeburgh, Thorpeness, Dunwich and South Southwold and Southwold are relevant.

### **Key Local Issues**

#### *Onshore – Built Heritage*

- 12.7. The cable route crosses through a protected woodland to the south of Aldringham Court, a Grade II listed building. The building and its grounds were designed by Cecil Lay and the historic and architectural interest that comes from this association with a well-known local architect contributes to the significance of the asset. The development would require the removal of a section of the woodland to

accommodate the development and the Councils are concerned regarding the implications of the works on the setting of Aldringham Court. The grounds are part of Lay's original design and therefore this designed garden setting is important to the understanding of the significance of the building. The loss of part of the original design would therefore alter this setting as part of the original design would be lost. However, it is recognised that there is currently a high degree of visual separation between the building and this piece of land due to the large laurel hedge that forms a boundary to the formal gardens to the front and side of Aldringham Court.

- 12.8. The Councils have significant concerns regarding the harm the development will cause to the significance of a number of listed buildings which surround the substation site due to the impact of the development on their setting. In particular there are three Grade II listed 17<sup>th</sup> Century farmhouses (Little Moor Farm, High House, Woodside Farm) which are well preserved examples of local vernacular building tradition. These farmhouses have direct and proximate relationship to their agricultural setting and have a special, long established, relationship with the traditional farmed landscape. The continuing productive agricultural use of the surrounding land, its character and openness contribute significantly to the setting of the listed buildings.
- 12.9. The relationship between these buildings and their farmland setting will be fundamentally changed by the introduction of industrial development of the scale proposed. The scale and prominence of the proposed development in that setting is striking; the substation buildings would be within 500m of all of these assets. The existing pylons do not disrupt this setting to anywhere near the same extent as the proposal, the landscape is still fundamentally rural in character and the farmhouses can be appreciated in their rural setting surrounded by open, productive farmland. The development involves a transformation of the landscape character of the site to that of an industrial or other essentially urban, built up use of land. As well as the visual impact of the substation infrastructure, harm will also be caused by virtue of the loss of agricultural use over a wide area within the farmhouses' setting.
- 12.10. The Church of St Mary is Grade II\* listed. The Councils are concerned that the substations developments to the north would challenge the dominance of the church as a landmark building in the village and would therefore cause harm to the significance of the asset. Village churches were built as landmark buildings within settlements; the tallest building which would be a prominent feature in views from within and around the village. Due to its height the church also helps to connect the outlying farmhouses and other buildings to the core of the village, the inter-visibility between the church and other buildings surrounding the village centre is an important part of the church's significance. The proposed development lies to the

north of the church and would block views of the church from the farmhouses that lie to the north of the settlement core on the edge of the historic common land.

- 12.11. The historic parish boundary between Friston and Knodishall runs directly through the middle of the proposed substation locations. This is represented on the ground by a trackway that is a PRoW. This route connects the historic common land to the north to the village core surrounding the church. There are clear views of the church when approaching the village from the north following the PRoW. Further research has been completed to ascertain the age and significance of this feature. The PRoW is proposed to be re-routed. The Councils are concerned about the destruction of this historic route and loss of an important view of the Grade II\* listed church.
- 12.12. The Councils are concerned about the impact of the proposed Outline Landscape Mitigation Plan on the setting of High House Farm, Little Moor Farm, Woodside Farm and the Church of St Mary. While the estimated growth rates are contested by the Councils this does not change the fundamental issue when it comes to the impact on heritage assets. The landscape mitigation plan shows significant areas of new woodland in close proximity to these historic farmhouses and the church. Rather than mitigating the impact on these assets the mitigation may have a further negative impact. While some historic field boundaries are proposed to be reinstated to the south of the site these large areas of woodland have no historic precedent and merely have the effect of further severing the relationship between these historic assets and their open agricultural setting.

*Offshore – Impact on Onshore Built Heritage*

- 12.13. In relation to offshore the main issue relates to the impact of the presence of the turbines on the uncluttered seascape and the importance/contribution this uncluttered seascape has on the onshore heritage assets. The Councils are particularly concerned about listed buildings and parts of conservation areas that were specifically designed as seaside holiday resorts to take in the open vistas and natural beauty of the Suffolk coast. Qualitative change in the nature of the sea view diminishes the contribution that this setting makes to a historic seaside resort. The introduction of turbines into this setting will introduce a man made, almost industrial, addition to the seascape. The seascape, especially at the horizon, is an unchanged part of the historic setting of the assets. The introduction of a large number of fixed structures that stretch right across the horizon with no respite would therefore be a drastic change to the historic setting of these assets. The harm could be mitigated if the turbines did not stretch right across the horizon, as with previous turbine arrays which have been more tightly grouped, which would allow at least some views of the unchanged seascape.

## Adequacy of Application/DCO

### Onshore – Built Heritage

- 12.14. Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets. A number of times within this document the author(s) make an attempt to define the setting of the heritage assets in spatial terms (e.g. paragraph 45 *‘the positive contribution that setting makes to the significance of Little Moor Farm is therefore largely limited to the area within 200m-300m of the farmhouse’*). This is not considered to be useful and may also be considered misleading as the NPPF definition of setting states, setting is: *‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.’*
- 12.15. The assessment of the impact on High House Farm states that the *‘lack of close public access following the diversion of the Public Right of Way (PRoW) means that there are no informative close-range views of the farmhouse from where its architectural interest can be appreciated’* (paragraph 60). This statement is inaccurate as the significance of a listed building does not depend on views from the public realm and therefore there are informative close-range views of the farmhouse; from within its own curtilage. The assessment of this asset is further flawed by the statement *‘Screening by vegetation and surrounding buildings and the absence of close-range views means that the historic character of the Listed Building cannot be readily appreciated from its setting, diminishing the value of the views affected by the proposed East Anglia TWO and East Anglia ONE North projects.’* (paragraph 69). By definition the setting of a heritage asset is the surroundings in which it is experienced so it is not clear what point this statement is trying to make. Given that paragraph 67 states that *‘The presence of the onshore substations and National Grid substation, only 450m to the south-east, would represent a significant change in the character of the landscape in views looking south-east in the setting of High House Farm’* the Councils consider that the proposal would result in adverse impact of medium magnitude so the effect would be of moderate significance in Environmental Impact Assessment (EIA) terms.
- 12.16. Cultural Heritage Viewpoint 5 is supposed to show the predicted visual impact on the setting of Woodside Farm. However, the angle of the viewpoint selected means that the building itself blocks any views of the proposed location of the eastern substation. There is therefore no baseline or indicative views from which an informed opinion can be formed. The eastern substation location is still within 450m of the farmhouse cutting off what are currently extensive views of the agricultural landscape and inserting large scale industrial structures.



- 12.17. The Councils consider that there would still be an adverse impact of medium magnitude on Woodside Farmhouse if just the eastern substation was constructed. The Councils also disagree that the proposed mitigation planting would reduce the impact of the proposals. The new woodland planting to the north is not a historic feature of the landscape and would create further separation of the farmhouse from the agricultural landscape setting. The land only rises very slightly and there are currently long-range views all the way across to Laurel Covert. The statement that the *'farm would be retained in an area of fields sufficient to provide an appropriate setting' (161)* is meaningless. How has it been decided that this is an 'appropriate setting' and based on what evidence? The setting of the farm will be changed from an expansive agricultural landscape broken up with hedgerows and hedgerow trees to a few small fields between the farmhouse and large-scale industrial structures partially screened by a large new section of woodland. The Councils therefore do not consider that the proposed landscape mitigation would mitigate the harm to the heritage asset and the impact should be considered to be moderate in EIA terms even after mitigation.
- 12.18. Given that it is stated in assessment that the substations *'would entirely obstruct the sequential longer range views of the church tower from the north when approaching Friston on the public footpath from Little Moor Farm' (paragraph 108)* the Councils consider that the adverse impact on the Church of St Mary should be of medium magnitude. This is a key view of the church from a PRoW that is thought to have been in existence in some form since the 10<sup>th</sup> century, before the church was even built. The view from the historic common land at Friston Moor back towards the village core is a vital one in being able to understand how the settlement developed. The church tower is an important landmark and is key to connecting the dispersed parts of the village back to the core. Blocking this PRoW and associated views of the church from the various farmhouses that were built on the edge of the common land substantially diminishes the ability to understand this historic relationship.

#### *Offshore – Built Heritage*

- 12.19. The assessment of the impact of the offshore infrastructure on coastal assets is sound (Appendix 24.8). However, the Councils do want to highlight the number of listed buildings that will be impacted by the proposals. Harm has been identified to buildings and conservation areas designed as seaside holiday resorts, the assessment of the impact on Lowestoft describes the proposals as impacting 10 listed buildings. A number of the listings are group listings of large terraces; 1-24(cons) Wellington Esplanade, 16-28(cons) Victoria Terrace, 3-19(cons) Kirkley Terrace. This means that in fact over 50 listed buildings in Lowestoft will be impacted.



*Summary*

12.20. The Councils have identified harm in relation to the setting of the heritage assets which should be considered against paragraph 196 of the National Planning Policy Framework. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty to have special regard to the desirability of preserving listed buildings and their settings and case law (*East Northamptonshire DC v Secretary of State 'Barnwell Manor'*) has established that a finding of harm to a listed building or its setting gives rise to a "strong presumption" against granting permission. The Councils consider that the promoter's assessment of harm is flawed by their assessment of the extent of the setting of the designated heritage assets which is contrary to the definition in the NPPF. This has resulted in their assessment minimising the level of harm the project would cause to the significance of a number of designated heritage assets.

*Compliance with Local Policy*

12.21. For the reasons set out in the summary the proposal is not considered compliant with emerging local policy specifically Policy SCLP11.3.

## 13. Archaeology

### East Suffolk Council Local Plan Policies

- 13.1. Policy DM21: Design: Aesthetics, requires that the design of any development should have regard to the need to protect existing features that have a heritage value and that where possible such features should be enhanced.
- 13.2. Policy SCLP11.3: Historic Environment, promotes the conservation and enhancement of the historic environment. The policy requires all development which has the potential to impact on historic assets or their settings is supported by a Heritage Impact Assessment and/or an Archaeological Assessment.
- 13.3. Policy SCLP11.7: Archaeology, requires a full archaeological assessment to be provided where a development is affecting areas of known or suspected archaeological importance to ensure provision is made for the preservation of important archaeological remains. The policy makes it clear preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of archive is more appropriate.

### Other Relevant Policy

- 13.4. In addition, sector-specific advice and guidance should be used to frame the decision-making processes – see Historic England Good Practice Advice, and Historic England Advice Notes (<https://historicengland.org.uk/advice/planning/planning-system/>).

### Key Local Issues

#### *Landfall*

- 13.5. The Landfall is interpreted predominantly as geophysical anomalies relict of a post medieval landscape. However, there appear to be tracks and boundaries which sit on a different alignment to more recent field systems, and the Historic Environment Record (HER) data includes a record for a possible late prehistoric double ditched enclosure. It is probable that there are multiperiod remains relating to landscape use evident in the geophysical survey data.
- 13.6. Generally, at landfall and across the application area, World War 2 features have been assigned 'low' (local) importance, although this assessment needs testing against the wider context of the Suffolk coast in WW2. The Earthwork Survey

commissioned by the promotor adds detail to the knowledge base of these, within the limits of what was accessible at this stage.

*Cable Route - Hundred River Area*

- 13.7. There is a complex site on the valley slopes overlooking the Hundred River, to the east of School Plantation opposite Aldringham Court, with features showing on geophysical survey. The post-medieval plantation may mask the earlier topography, but the site appears as a prominent landscape feature, and the initial trial trenching currently being undertaken in the area indicates 10<sup>th</sup>-14<sup>th</sup> century AD activity at the site. The indications are that there are well-preserved remains in land that is pasture, with stratified sequences of archaeological features and deposits. The logistics of archaeological mitigation at this point should be considered, beginning with palaeo-environmental assessment to confirm the depths of deposits of interest. Barrows may have continued along this contour from where they survive just to the north on Aldringham Green, and fragments of a *possible* ring ditch were investigated in one of the trenches excavated Nov/Dec 2019.
- 13.8. There are HER records for military sites in particular, as well as a possible late prehistoric double ditched enclosure. The later activity may have had an impact on archaeological remains but should also be considered of heritage interest on its own merit. There is also a possible Bronze Age mound.
- 13.9. Anomalies showing underlying remains relating to past settlement and landscape, including trackways, field boundaries, ladder-like small enclosures (which could be Medieval or Roman) and smaller enclosures suggesting settlement or industrial activity. There are possible ring ditches, one of which was close to a trench from which Early Saxon pottery was recovered from an archaeological feature. This may indicate Early-Saxon activity in the vicinity of an earlier monument.

*Cable Route – Friston Area*

- 13.10. A large area of activity, including a cluster of enclosures south west of and apparently pre-dating Grove Wood and possible medieval roadside settlement. Within this area also are the possible sites of Buxlow church/chapel. Inconclusive geophysical survey for both areas showed magnetic disturbance which may have natural origins or represent spread material. If there is a church site with a cemetery, there would be high potential for evidence relating to questions of Anglo-Saxon to Post-medieval land use, settlement and religious and funerary practice - whether this is regional or higher importance cannot be understood without trenching. Excavation of a church and burial ground would require potentially extensive, time-consuming and delicate

archaeological excavation. It is suggested that there will be scope for avoidance should sites prove to be chapel site with associated human remains. However, there is another potential pinch-point in the cable route, to the north of Friston Church and the key location has not been subject to archaeological evaluation or metal detecting.

- 13.11. There is also an area of curvilinear ditches southwest of Friston Moor Covert which Suffolk County Council Archaeological Service suggest may represent a Roman site with subsidiary enclosures.

#### *Substations*

- 13.12. An apparently discrete site was identified through geophysical survey North of Manor Farm. This is within the area of temporary land uptake, and measures may need to be put in place to avoid it as appropriate.
- 13.13. Possibly reflecting its topographic location, the geophysical survey did indicate a generally lower density of extensive sub-surface remains across the substation site, in contrast with elsewhere on the screen, which has been also suggested by a c2% trenched evaluation at this stage. It will require further ground-truthing but for a large part (but not all) of the substation area there would be no objection to further work being undertaken post-consent. Additionally, the former parish boundary runs through the site in the form of a track and is also identified as the Anglo Saxon Hundred Boundary. Boundaries, particularly meeting points between parishes, are often the location for archaeological remains relating to liminal activities, such as execution sites and deviant burial grounds.
- 13.14. To the west of the main substation site, includes two foci with evidence for enclosures and discrete features, although masked by the electronic interference from pylons. Remains here are within the hypothesised extent of Friston Hall and gardens, which has medieval origins as a manor owned by Snape Priory before it passed into the hands of Cardinal Wolsey.

#### *Offsite Highway Works*

- 13.15. There is a pill box of a Suffolk-square type in the area of improvement works to the A1094 which should be preserved in situ. It is not flagged in the ES.

## **Adequacy of Application/DCO**

### *Assessment of Importance and Heritage Significance*

- 13.16. The sound basis of non-intrusive archaeological investigation work presented in the submission should be acknowledged. However, the ES notes that ‘heritage importance (and associated heritage significance) is based on professional judgement and experience rather than any fully substantiated and established levels of heritage significance, as part of intrusive ground-truthing therefore cannot fully support the conclusions in the Environmental and Planning Statements that Chapter 24 of the ES gives a full, robust and comprehensive assessment, and advise that there are risks in the resulting heavy reliance on the data and on currently known assets to inform assessment of impact, design and mitigation.

### *The Extent of Ground Truthing using Trial Trenching*

- 13.17. Best practice is for geophysical survey to be ground-truthed and used as part of a suite of evaluation techniques. There is still potential for more extensive remains or for remains in apparently blank areas for reasons that include, for example, lower magnetic contrasts. Geophysical survey may have picked up large and significant features – such as ring ditches and complex settlement areas - but is less likely to have defined smaller features, burials, unenclosed settlements (e.g. from perhaps the Anglo-Saxon and prehistoric periods). As has been raised at an early stage and throughout Expert Topic Group discussion, in order to accurately assess impacts of the proposal and fully inform planning decisions, trial trenched evaluation is required to ground-truth the survey data. The ES refers to an additional suite of pre-consent field surveys commissioned by SPR, including targeted trial trenching, metal detecting and earthwork survey, but of these the metal detecting survey and full implementation of the intended initial targeted trial trenching have not been undertaken. At present less than 1% of the onshore Order Limits has been investigated through intrusive trenching. A matter of principle is that there is some risk to sites as yet unknown, as preservation would not be fully guaranteed once consent is granted, and the residual impacts of the potential destruction of sites where preservation would be more appropriate than preservation by record cannot be fully judged at this stage.
- 13.18. Deferring evaluation to post-consent also means that the scope of excavations is unknown, which could affect other elements of project planning. The Outline Pre-Commencement Archaeology Execution Plan is intended to establish the logistical considerations in delivering archaeological work with other constraints (for example, sections 3 and 4 cover links with ecology, spills, drainage, dust, waste, hazards,

contamination, flooding, traffic, welfare, transport, health and safety etc). At this stage, however, the required timetables and issues such as required excavation depths and scale and spoil volumes, for example, which may affect construction approaches, dust management, water and sediment management and spoil management are unknown. Archaeology is not clearly set out in the initial high-level project timescales as presented in the EIA.

*Public outreach*

- 13.19. Finally, the ES makes little reference to outreach/public benefit as part of mitigation beyond appropriate publication of the results and archiving. The DCO and WSI should demonstrate a commitment to delivering enhanced public understanding. This may stretch to long term management of assets, provision of outreach opportunities such as blog, site visits, community involvement, and strategic linking of archaeology with any other landscape/tourism initiatives and public space works.

*Compliance with Local Policy*

- 13.20. The submitted archaeological information falls short of the level of detail required and contrary to the advice provided to the promotor by the County Archaeology Service and therefore is contrary to local policy.

## **14.Design and Masterplan**

### **East Suffolk Council Local Plan Policies**

- 14.1. Policies DM21 and DM22 set out the criteria for considering the layout and design of development within the District. It is expected that development should relate to the scale and character of their surroundings.
- 14.2. Policy SCLP11.1: Design Quality, seeks to encourage high quality design that responds to the local character, setting out criteria proposals should meet. The policy seeks to ensure development is designed appropriately responding to local context in terms of factors including the overall scale and character, layout and making use of high-quality materials.

### **Key Local Issues**

- 14.3. One of the main concerns of the local community and the Councils is the design of the substations and whether adherence to the Design Principles Statement for which an outline document has been provided would deliver a development of acceptable standards. The Councils want to ensure that all reasonable endeavours have been made to minimise the scale of the substations, through the parameters of the buildings themselves and through its siting, specifically whether it could be lowered into the ground.

### **Adequacy of application/DCO**

- 14.4. The Outline Onshore Substation Design Principles Statement (document 8.8) sets out the design principles which will underpin the design of the operational substation. Requirement 12(2) ensures that the details provided by the promotor under this requirement accord with the Outline Design Principles Statement. It is understood that this document should also be read in association with the provided principles for the overall substation site design.
- 14.5. Requirement 12 however does not include the same constraint in relation to the National Grid substation which would by virtue of the current wording of the DCO not be required to accord with the Outline Design Principles Statement. The Councils consider that the design principles should relate to all the substations on site and therefore the wording of the DCO should be amended accordingly.
- 14.6. Insufficient detail has however been provided by the promotor for the Councils to be able to adequately assess the design of the development. The submission material

does not include details of the existing and proposed site levels, finished floor levels of the substations or any cross section through the substation site. Two finished floor level figures 19.8m and 21.4 AOD have been provided within the Outline Onshore Substation Design Principles Statement (Document 8.8, paragraph 11) but it is not clear which point on the platforms these figures relate to and whether the platforms are one uniform level. This matter is further confused as different finished floor level figures are provided in the OLEMS (Document 8.7, paragraph 104) where the levels are stated to be 18.2m and 20.7m AOD. It is also understood that some cut and fill will be required on the site but details of this are not clear.

- 14.7. The outline design principles as set out do not include a clear commitment to reducing the overall size of the substation and height of the buildings and equipment during the design refinement process post consent. This is of vital importance given the significant effects identified within the ES and the significant concerns expressed within Section 15 on Landscape and Visual.
- 14.8. The outline design principles also do not include a commitment in relation to noise mitigation. Within Section 19 on Noise and Vibration, the Councils have expressed significant concerns regarding the predicted noise rating at the substations site and would wish to see a principle which would require the substation to be designed to mitigate noise pollution. This could include the location of the largest noise sources away from noise receptors and require the installation of noise mitigation/suppression.
- 14.9. The Outline Design Principles Statement as drafted does not provide the Councils with sufficient confidence that the promotor will seek to secure a substation design where every effort has been made to reduce the overall size of the structure and its noise impact. The fact that the principles would not relate to the National Grid substation is also considered unsatisfactory.
- 14.10. Without appropriate changes to the Outline Design Principles Statement the Councils consider that there is insufficient control in relation to the design of the promotor's and National Grid's onshore substations to ensure that the development would comply with local policy.
- 14.11. In addition to the outline design principles providing insufficient control for the proposed development, neither the design principles nor the illustrative masterplan adequately considers the potential of future development. As highlighted in Section 26, National Grid has clearly shown through their connection offers for Nautilus and Eurolink interconnectors and preliminary connection offers for the Galloper and Greater Gabbard wind farm extensions, that the substation proposed under this



application will provide a strategic connection offer for future projects. The masterplan should therefore address the potential future expansion needs of the National Grid substation at the very least. The status and treatment of the National Grid substation needs further consideration taking into consideration the principles of good design.

*Compliance with Local Policy*

- 14.12. The Councils do not consider that the application as submitted complies with local policy which emphasises the need for development to relate well to the scale and character of its surroundings. There is insufficient commitment to minimise the scale of the substations, adequately mitigate the noise emitted or address the known future intentions of the site.

## **15.Landscape and Visual Impacts**

### **East Suffolk Council Local Plan Policies**

- 15.1. Policy SP1 seeks to achieve sustainable development by conserving and enhancing the natural and built environment in the district and maintaining and enhancing a sense of place.
- 15.2. Policy SP15: Landscape and Townscape, contains a commitment to protect and enhance the various landscape character areas within the District. These include not only the statutory designations such as the AONB but also refer to the Special Landscape Areas covered by Policy AP13 of the saved policies from the earlier Local Plan relating to a number of river valleys and tributaries including the Hundred River valley which is affected by the cable route.
- 15.3. Policy SCLP10.4: Landscape Character, requires development to be informed by, and sympathetic to, the special qualities and features described in the Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018). The policy sets out an expectation that proposals demonstrate how they will protect and enhance a number of factors including the special qualities and features of an areas, the visual relationship and environment around settlements and their landscape setting, distinctive landscape elements, seascapes, river valleys and significant views. Development will not be permitted where it will have a significant adverse impact on sensitive landscapes. Conserving and enhancing the landscape and scenic beauty of the AONB is identified as being of particular importance.

### **Other Relevant Local Policy**

- 15.4. The Suffolk Coast and Heaths AONB Management Plan draws attention to the special landscape characteristics of the AONB and that they should be protected and enhanced. These are set out in detail in the Character and Special Qualities document.
- 15.5. The Developers' Guide identifies that contributions might be required for hard or soft landscaping including for maintenance.

### **Key Local Issues**

15.6. The principal issues of concern are twofold:

1. The landscape and visual impacts of the onshore elements of the project, including the cumulative impacts between EA1N and EA2.
2. The visual, landscape and seascape impacts of the offshore turbines on the Suffolk coast generally, as well as the AONB and its setting, including the cumulative impacts between the projects.

15.7. In addition, the secondary concerns are:

1. Cumulative effects with other projects - the in-combination effects between the construction and operation of the proposed projects and the construction and operation of Sizewell C Nuclear Power Station is also a highly relevant consideration.
2. Construction effects - The Councils have also identified landscape and visual impacts associated with temporary development, particularly cable corridor works at Sizewell Gap and Aldringham which are a significant concern.
3. Loss of hedgerow and woodland trees - The residual impacts associated with the loss of hedgerows and woodland in the cable corridor and the associated constraints on replanting (and consequential impacts for landscape character and visual amenity). We do expect residual impacts on the character of the landscape in the cable corridor because of the loss of woodland at Aldringham, specifically on the east side of the B1122 adjacent to Gypsy Lane, as well as on the west side of the B1122 south of Aldringham Court (Aldringham Nursing Home, formerly Raldisend). Woodland will also be lost at Laurel Covert in association with the sub-station development.

### **Adequacy of Application/DCO**

#### *Design Assessment and Mitigation of the Substations at Friston*

15.8. At the substation site north of Friston, it will be important in particular to understand whether all reasonable endeavours have been made to minimise the scale, both through the parameters of the buildings themselves and through its siting, specifically whether it could be lowered into the ground. This matter has been further discussed in Section 14 of this report.

- 15.9. Furthermore, it will be further important to understand whether the proposed mitigation planting and suggested growth rates are capable of being delivered and that management of the site and associated planting is adequately secured for the long term, given the significant visual envelope of the development. In addition to the visual impacts there will be significant and permanent change to the character of the landscape at the substation site including the surroundings and amenity of the village of Friston.
- 15.10. These matters have been a key concern of Friston Parish Council (in East Suffolk District) and residents in this area.

*The Character of the Landscape at the Substation Site*

- 15.11. The promotor has not fully understood the character and significance of some of the features and landscape elements of the site, especially regarding the historic landscape character. Therefore, it has not been possible for the ES to fully recognise the degree of harm caused by the development. An additional study of the site and its historic landscape features has been prepared by Suffolk County Council Archaeological Service. In summary the findings are as follows:

*Extant historic landscape features, of local and regional importance, will be permanently destroyed as a result of the substation development. This will include the permanent destruction of part of the track as part of the historic Hundred and parish boundary, as well as of historic field boundaries. As such the landscape context of the regionally and potentially nationally significant moated site and associated land will be affected.*

*Proposed Mitigation Planting and Visual Impacts*

- 15.12. The submitted application did not adequately justify the effectiveness of the onsite planting at the substation site. The proposed growth rates are not reasonably likely to be achievable in the local conditions which include relatively light, free draining soils, and prolonged dry spells with little or no effective rainfall through the critical spring and summer periods. The repeated claim in the ES that new planting will be approaching maturity after 15 years is not accepted by the Councils, and therefore neither are the claims of effective mitigation after 15 years accepted. As a result, the findings of the Landscape and Visual Impact Assessment (LVIA) regarding the visual impacts of the substation site are not sound. Furthermore, the species set out in the OLEMS (document ref 8.7 p25-26) are not agreed. We are seeking to engage with the promotor to resolve this issue and for them to update the LVIA, including the

visualisations, based on agreed, realistic growth rates and agreed species. The Councils had previously provided their views on these matters, prior to submission of the DCO, to a timetable agreed with the promotor.

*The Substation Visualisations*

- 15.13. The reliability of the submitted visualisations is compromised by the inclusion of areas of advanced planting which suggest the possibility of four years growth by the first year of operation, but with the risk of this advanced planting not actually being guaranteed deliverable.
- 15.14. Generally, the representation of planting particularly that said to illustrate 15 years of growth is not accurate or reliable. Much of the illustrative material in the LVIA appears to show trees and vegetation of significantly greater maturity, including features present which are indicative of vegetation around 50-60 years of age or older.
- 15.15. The findings of the LVIA in the application have led the promotor to conclude that no additional offsite planting is required to mitigate the visual impacts of the substation site. Therefore, no s106 agreement has been proposed in order to mitigate residual impacts. However, a scheme of offsite planting has been proposed under s111 of the Local Government Act 1972, which we recognise is therefore not a material planning consideration.

*Assessment of Impacts and Mitigation in the Cable Corridor*

- 15.16. The Councils accept that the undergrounding of the cabling in its entirety provides significant mitigation against visual and landscape impacts.
- 15.17. The issue of hedgerow loss from an ecological perspective is discussed in Section 5.3 of the OLEMS. The ES (Chapter 22, Summary Table 22.26 and Annex 1) concluded that there would initially be Major Adverse Effects resulting from hedgerow crossings in several locations although these can be mitigated through replacement planting with residual effects reducing to Minor Adverse. However, it is the view of the Councils that because these hedgerows were characterised by substantial trees within them that would be removed and not replaced, significant adverse effects on landscape character will persist.
- 15.18. From a landscape perspective, the OLEMS notes that there are 65 hedgerows within the onshore development area that fulfil qualifying criteria (including ecological) for classification as 'Important' under the 1997 Hedgerow Regulations. Whilst the

Councils note the intention to reduce working width 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. The proposal to carry out a detailed pre-construction hedgerow survey in order to have a detailed inventory of hedgerow characteristics to aid reinstatement is welcomed, as is the intention to install root protection areas for retained hedgerows during construction. The appointment of a suitably qualified arboricultural clerk of works by the developer will be sought by the Councils. The outline replanting proposals are acknowledged and at this stage are accepted as a positive move towards restoration of key landscape features.

- 15.19. Deer fencing is essential for effective establishment and protection of new woodland planting, it is at present not clear under which requirement of the DCO is secured.

*Compliance with Local Policy*

- 15.20. The project by virtue of its identified significant landscape and visual effects and for is not considered compliant with local policy.

## **16.Seascape and Visual Effects**

### **East Suffolk Council Local Plan Policies**

- 16.1. Policy SP15: Landscape and Townscape, seeks to protect and enhance the various landscape character areas within the district in addition to the AONB. The character of the seascape contributes to the coastal landscape character areas and sections of the AONB.
- 16.2. Policy SCLP10.4: Landscape Character, as set out in paragraph 13.2, the policy sets out the importance of protecting and enhancing the special qualities and features of areas including the contribution made by the seascape.

### **Other Relevant Local Policy**

- 16.3. The AONB Management Plan draws attention to the special landscape characteristics of the AONB and that they should be protected and enhanced. These are set out in detail in the Character and Special Qualities document.

### **Key Local Issues**

#### *EA1N Project*

- 16.4. The offshore wind turbines of the EA1N project will have significant adverse effects only in-combination with those of EA2. Overall there will be significant adverse landscape and visual effects on the coast of Suffolk from these projects cumulatively, including on the character and special qualities of the AONB. These impacts have been identified by the promotor in the Seascape Landscape and Visual Impact Assessment (SLVIA). The Councils consider that the proposals in combination for the offshore turbines will have a direct and long-term negative impact on the nationally designated landscape and, given the design of the submitted scheme, that this cannot be fully mitigated.
- 16.5. The Councils are not satisfied, given the sensitivity and designation of the receiving landscape and seascape in general, that the promotor has demonstrably exhausted all reasonable mitigation measures to limit the cumulative impacts of this project with EA2 in terms of design of the EA2 scheme, including the height of the turbines.

*EA2 Project*

- 16.6. The offshore wind turbines of the EA2 project will have significant adverse impacts on the coastline between Covehithe and Orford. In addition, they will have significant in-combination effects with EA1N. Overall there will be significant adverse landscape and visual effects on the coast of Suffolk from these projects, including on the character and special qualities of the Suffolk Coast and Heaths AONB. These impacts have been identified by the promotor in the SLVIA. The Councils consider that the proposals for the offshore turbines will have a direct and long-term negative impact on the nationally designated landscape and, given the design of the submitted scheme, that this cannot be fully mitigated.
- 16.7. The Local Authorities are not satisfied, given the sensitivity and designation of the receiving landscape and seascape in general, that the promotor has demonstrably exhausted all reasonable mitigation measures in terms of design of the scheme, including the height of the turbines.

*EA1N and EA2 Projects*

- 16.8. The horizon and sea views along this coastline are largely uncluttered and as such make a significant contribution to the character of place and the setting of the AONB and Heritage Coast. The nationally designated landscape of the AONB including its character and condition is much valued by visitors and residents alike and makes a key contribution in the local economy (see Section 20).
- 16.9. The Councils recognise that the principal consultee in respect of the impacts of the development on the AONB and their significance is Natural England. However, the Councils are seeking to meet their duties under section 85 of the Countryside and Rights of Way Act 2000 and to reflect the concerns of local communities.

**Adequacy of Application/DCO**

*EA1N - Design, assessment and mitigation of the offshore turbines*

- 16.10. The promotor has identified significant cumulative effects between the two projects and that there will be significant adverse impacts on the coastline and coastal waters including on the character and Special Qualities of the AONB. Despite this finding they have concluded that it is not possible for these impacts to be mitigated. Therefore, no s106 has been proposed. However, works to “offset” the harm caused are proposed to be funded through a s111 agreement, which we recognise is not a material planning consideration.



*EA2 - Design, assessment and mitigation of the offshore turbines*

- 16.11. The promotor has identified significant effects from the EA2 project, and also in combination with EA1N, and that there will be significant adverse impacts on the coastline and coastal waters including on the character and Special Qualities of the AONB. Despite this finding they have concluded that it is not possible for these impacts to be mitigated. Therefore, no s106 has been proposed. However, works to “offset” the harm caused are proposed to be funded through a s111 agreement, which we recognise is not a material planning consideration.

*Compliance with Local Policy*

- 16.12. The development by virtue of the significant adverse effects identified in the ES on the AONB is not considered compliant with local policy.

## **17.Land Use**

### **East Suffolk Council Local Plan Policies**

- 17.1. Policy SP29: Countryside recognises that the countryside is an important economic asset supporting uses including agriculture.
- 17.2. Policy SCLP10.3: Environmental Quality, seeks to protect high quality agricultural land where possible and states that proposals will be expected to minimise the loss of agricultural land.

### **Other Relevant Local Policy**

- 17.3. The East Economic Growth Plan 2018-2023 and NALP Economic Strategy for Norfolk and Suffolk in 2017 identifies agriculture as an important and long-established sector in East Suffolk.

### **Key Local Issues**

- 17.4. The main issue relates to the loss of agricultural land and disruption to agricultural activities. The majority of the land within the onshore Order Limits is arable although there are some non-agricultural areas comprising woodland and waterbodies.
- 17.5. The onshore development area covers Grade 2 (very good), Grade 3 (good to moderate) and Grade 4 (poor) agricultural land. The onshore substation and National Grid infrastructure will result in the permanent loss of agricultural land of Grade 2 and Grade 3 quality. The construction works for at the landfall and along the cable route involve the temporary loss of land out of agricultural production. Agricultural land is vulnerable to structural damage, erosion, compaction and introduction of notifiable weeds. The works may also degrade the soil quality and future agricultural productivity.
- 17.6. The principle of whether the application is an appropriate use of land has been discussed within Section 6 Principle of Development. The impact of the application on the PRoW is discussed within the next section of the report (Section 18).

### **Adequacy of Application/DCO**

- 17.7. The ES identifies that the impact on agricultural land is minor adverse during both construction and operation phases. Requirement 22 of the draft DCO secures the production of a Soil Management Plan as a sub-document of the CoCP. The OCoCP

states that this Soil Management Plan will describes methods to avoid mixing of subsoil, minimise soil compaction and disturbance to the surrounding areas and reinstatement of soils in general accordance with their original structure and location. The Soil Management Plan will also include Method Statements for soil handling. A pre-construction land survey will be undertaken by a qualified Agricultural Liaison Officer to record details of crop regimes, position and condition of field boundaries, existing drainage and access arrangements and private water supplies.

- 17.8. The promotor has stated in Chapter 21 of the ES that it is not possible at this stage to calculate the area of land which would become isolated or inaccessible, it is however likely that this will be a relatively small area. The Councils urge the promotor to make every effort to keep such areas to an absolute minimum and to fully engage with individual farmers to ensure this is the case. Agricultural land is an important and prevailing characteristic of the landscape.
- 17.9. Although it is acknowledged that the promotor will seek to minimise disruption to farming practices via good management measures secured through the CoCP, the development will still result in the permanent loss of an area of Grade 2 and Grade 3 agricultural land by virtue of the choice of substation site.

*Compliance with Local Policy*

- 17.10. Although the loss of agricultural land is regrettable, the Councils concern in this regard primarily relate to the impact this will have on the landscape character and setting of heritage assets (see Sections 12 and 15). With the exception of the substation site, to the best of the Councils understanding, the measures outlined in the CoCP and within the submission will help to minimise impacts on agricultural activities.

## **18.Public Rights of Way**

### **East Suffolk Local Plan Policies**

- 18.1. SCLP10.4: Landscape Character recognises the importance of the PRoW network in relation to supporting health, wellbeing and social interaction and seeks to protect and enhance the provision.

### **Other Relevant Local Policy**

- 18.2. Suffolk Green Access Strategy (Rights of Way Improvement Plan - ROWIP) is a statutory Plan produced by Suffolk County Council as required by the Countryside and Rights of Way (CROW) Act 2000 (Section 60 and 61). It provides a clear direction as to how the rights of way and access network is managed, maintained and improved to meet the needs of all users.
- 18.3. Improving the quality of the experience on urban and rural rights of way has become increasingly important politically and strategically and the Green Access Strategy highlights the importance of the rights of way and access network for health and wellbeing, safe and sustainable travel, leisure activity and economic growth. It represents Suffolk County Councils' commitment to making the very most of this asset and to provide our residents, our business community and our visitors with an array of different and innovative opportunities to use, enjoy and benefit from.
- 18.4. Objectives within the Strategy include protecting the network from adverse impacts from new developments and to create a more connected network.

### **Key Local Issues**

- 18.5. The onshore works associated with the cable route will affect 26 PRoWs in the locality during construction, whilst the substation works will require the permanent stopping up of a section of PRoW to the north of the village of Friston. The access network serves both residents, visitors, and tourists.
- 18.6. Around the village of Friston, the access network will be severely compromised by the construction of the substations site and residents, and others, will suffer both temporary disruption and permanent loss of a key public footpath.
- 18.7. The access network including PRoWs, open access and common land are also key features of the visitor experience of Suffolk. The quality of the coastal landscape, its high level of accessibility and its connectivity to coastal towns, villages and

hinterland, are the draw for visitors. A third of Suffolk's residents say the countryside is the best thing about living in Suffolk, making green access a key driver in growing the visitor economy (Destination Research, Economic Impact of Tourism Suffolk 2016).

- 18.8. The Councils therefore want to ensure the disruption to the PRow network is minimised and where impacts cannot be avoided, appropriate and timely mitigation needs to be provided.

### **Adequacy of Application/DCO**

#### *Amenity and Quality of user experience on PRow affected by the development*

- 18.9. The impact of the development on the amenity and the quality of the user experience of the PRow network has not been adequately addressed in the application. This aspect should be a separate theme within the ES in order to address the impact on both the tourism industry and local communities.
- 18.10. The promotor has addressed some of the logistical aspects relating to the closure of the physical infrastructure of PRow with the provision of alternatives, temporary and permanent, through the Outline PRow Plan but has not addressed the impact on the amenity value of these PRows.

#### *Cable Corridor and Landfall Site*

- 18.11. The fact that many PRows along the cable corridor and substation site will only be closed temporarily does not mean that they are preserved as a local amenity when the ability to derive any enjoyment from them is severely reduced. The application does not recognise or mitigate for this loss of amenity.
- 18.12. In the Tourism, Recreation and Socio-Economics - Chapter 30, the promotor has failed to recognise that the Sandlings Walk is a tourism asset. It is a long-distance route that is promoted nationally (Cicerone publication and shown on OS Explorer Maps) and should according to Table 30.10 have a medium sensitivity. Appropriate mitigation should be applied.
- 18.13. The promotor has failed to identify that the proposed route of the new National Trail, the England Coast Path, will be affected by the landfall site. This will be the first National Trail in Suffolk and is anticipated to bring economic benefits to the region.

*Substations Site*

- 18.14. The choice of location for the viewpoints with regards to the Landscape & Visual Impact (Chapter 29) at the substation site is not adequate with respect to the impact on walkers. The selection of viewpoints situated 1km apart at the extremities of the public footpath on the western edge of the substation site (Friston FP17) inevitably results in an underestimate of the actual impact of the development on a person walking that footpath.
- 18.15. There are no viewpoints taken from the proposed new public footpath that replaces the permanently stopped up footpath. This new route is wholly exposed to views of the development and thus the impact of the amenity and quality of the walking experience has not been recognised, or mitigated, by the promotor.

*Permanent Closure of Public Footpath at the Substations Site*

- 18.16. We disagree with the statement in the Onshore Substation Design Principles Statement that the “overall site design will seek to deliver gains for public amenity, including enhanced access through PRoW proposals”.
- 18.17. The permanent stopping up proposals will remove a historic, tranquil and attractive walking route in a rural landscape and replace it with a circuitous route that is not wholly screened from the new industrial landscape, running adjacent to the open road in parts and possibly in a ditch. During construction, there will be physical disruption, noise, a loss of tranquillity and a severe visual impact which will continue following construction. This is not a gain to the pleasantness and attractiveness of the walking routes around Friston.
- 18.18. The plan showing the proposed alternative public footpath is not adequate. The locations for the new alternative routes need to be accurately surveyed and mapped, together with a written description, including width, so that a definitive map and statement can be produced post-DCO.

*Outline Public Rights of Way Strategy (OPRoW)*

- 18.19. The principles for management in the OPRoW are broadly acceptable for taking forward to the detailed PRoW strategy. However, there is inadequate detail provided as to the phasing and duration of closures, particularly where several PRoWs are close together and the PRoWs at the substation site. The Councils are concerned that there could be closures and disruption of a network of PRoW all at the same time, leaving local walkers with very limited or no access at all.

*Compliance with Local Policy*

- 18.20. The importance of the PRoW network is recognised in local policy, the impacts of the development on the network has been set out above. As the proposals currently stand the application is not considered compliant with local policy in respect of protecting and enhancing the PRoW provision. The impacts on the amenity and quality of the user experience has not been fully assessed or mitigated.

## **19. Noise and Vibration**

### **East Suffolk Council Local Plan Policies**

- 19.1. Policy DM23: Residential Amenity, sets out that the Council will have regard to the potential adverse impacts of noise and disturbance on residential amenity.
- 19.2. The supporting text of Policy SP15; Landscape and Townscape, highlights that the AONB and Heritage Coast are protected, not only because of their visual qualities but also for their tranquillity and ambience.
- 19.3. Policy SCLP10.3: Environmental Quality, states that proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination including noise pollution.
- 19.4. Policy SCLP10.4: Landscape Character, identifies that proposals for development should protect and enhance the tranquillity and dark skies across the District.

### **Other Relevant Policy**

- 19.5. AONB Management Plan 2018-2023.

### **Key Local Issues**

- 19.6. The Councils are concerned about the noise and vibration impacts during construction, relating to the works themselves, the operation of the CCSs and associated HGV movements more generally. There are specific locations along the onshore order limits where residential properties sit in close proximity which are of key concern, landfall, area south of Sizewell Gap Road, Aldringham crossing and at the substations site. The Councils have previously raised significant concerns regarding the proposed Saturday working hours.
- 19.7. A key concern of the Councils and the local community relates to the impact of the operational noise from the substations. The background noise levels in this location are typically low, it is considered that the introduction of these new substations in this location will result in elevated noise levels and a potential for significant impact on sensitive residential receptors. It is further considered that as the noise is also uncharacteristic of the area, this will not only have an impact on residential amenity but also on the amenity and character of the area as a whole. In addition to the operational noise level, there is also significant concern regarding the character of



the noise as defined by BS4142 and whether the correct penalties for; intermittent noise, impulsive noise and tonal noise sources have been applied.

- 19.8. The proposals include alterations to the existing National Grid overhead lines which in addition to the realignment works include a new pylon and sealing end compounds. If this work introduces any additional power line tonal noise to nearby receptors this must be fully assessed.

### **Adequacy of Application/DCO**

#### *Construction Noise and Vibrations*

- 19.9. Construction noise and vibration is likely to amount to a negative impact on certain receptors at certain times during the construction period. There is an expectation that the principles and requirements of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration be implemented in full to reduce the impact on sensitive receptors.
- 19.10. BS 5228-1:2009 + A1:2014 utilises an “ABC” methodology, which specifies a construction noise limit based on the existing ambient noise level for different periods of the day and is presented within Table 25.9 of Chapter 25. A SoundPLAN noise model has then been generated utilising; construction noise source data, geographical and topographical data, intervening ground cover and has then been corrected for; the distance between the noise source and receiver, acoustic screening created by barriers, buildings etc. The “on-time” which various plant will operate as a percentage of the assessment period is then calculated to complete the model. The residential receivers have been categorised to have medium sensitivity throughout and the results divided into different phases of the construction programme.
- 19.11. The predictions indicated by this noise model claim there will be no impact on nearby receptors at the landfall location and no daytime impact on nearby receptors at the substation locations or along the onshore cable route. Therefore, the report has concluded that no additional noise mitigation measures will be necessary for these elements.
- 19.12. We note, however, that noise limits for individual receptors have been set on the basis of short-term ambient noise measurements which we consider unlikely to be representative of the typical noise climate at all locations. We also consider that

there is not sufficient information in the report to allow us to determine if the stated noise levels have been modelled correctly. This may have resulted in an underestimation of impact and therefore also in the requirement for mitigation.

- 19.13. It should be further noted that whilst BS 5228-1:2009 + A1:2014 seeks to protect sensitive receptors whilst acknowledging the inherent noise associated with construction activities there are certain points along the cable route that are extremely close to the construction works (principally Sizewell Gap, Aldringham crossing and the sub-station site). Due to proximity of works, duration of works or type of works (which include significant noise sources such as piling operations and may necessitate 24hr operation of plant for dewatering and security lighting) there may need to be an enhanced level of mitigation employed to protect residents adequately and this will need to be addressed in the CoCP along with the “Standard Mitigation” that has been stated in the outline document.
- 19.14. It is likely that in addition to monitoring required to ensure that works are compliant with the relevant standards that extra monitoring will be required in particularly sensitive locations to inform the requirement for localised, site specific mitigation. Plans for monitoring will need to be included in the CoCP and agreed with the local planning authority.
- 19.15. The consultation identified concerns with Saturday Afternoon working for construction activities, this appears to have been addressed in Appendix 25.2 Noise and Vibration Cumulative Impact Assessment:

*“As a worst-case scenario, HDD has been assumed to be in operation at the landfall location for 24 hours a day and assessed accordingly; for all other construction activities at the landfall, onshore cable route and onshore substation the assessment is based on construction between the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturday. Piling works may be required to provide a stable platform base for the HDD works at landfall, and for substructure works at the onshore substation and National Grid infrastructure. To present a conservative assessment, piling activity was included in the construction noise modelling and assumed to take place during early mobilisation works in Month 1 to Month 4 at the landfall, and at the onshore substation between Month 7 and Month 10. Piling work in the assessment is based on construction between the hours of 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturday.”*

- 19.16. Where there is a requirement for night-time or extended working hours, this will need to be agreed in advance with East Suffolk Council through an agreed process to be included in the CoCP.

*Operational Noise*

- 19.17. Following an initial assessment by the Councils significant concerns were raised in terms of the assessment and likely impact of noise from this project. As a result, the Councils appointed consultants, to review the DCO paying particular attention to operational noise from the projects alone and in-combination with each other and the National Grid infrastructure. A summary of the findings has been set out below.
- 19.18. The report highlights that the background noise levels at night are considered to be considerably lower than the promotor assumed value of 29dB <sub>LAF90, 5mins</sub>. Based on the consultants own site visit and analysis of the data provided in the submission, it is considered that a noise source generating a rating level of 34 dB LAR at noise sensitive receptors in current setting as proposed, would have a significant adverse impact on the surrounding areas. The report further states that as the noise source is likely to be completely different in character to the prevailing noise climate, it is likely that even noise at a significantly lower rating level would permanently alter the noise environment in the surrounding area. This assessment is specific to this particular location.
- 19.19. The consultant's report raises concerns regarding the calculation methodology, specifically regarding the modelling of noise sources, the lack of information provided regarding the potential noise mitigation and failure to assess noise from any of the proposed National Grid infrastructure. The promotor has received a copy of the report but has yet to respond on any of the points raised.
- 19.20. There are additional concerns regarding the rating level specified, highlighting the incorrect assessment of tonality, the lack of evidence to support the claim that the impulsive and intermittent elements of the noise source will not be distinctly audible at the receptors and that no 'other characteristics' correction should be applied. There are therefore significant concerns that the development proposed would not comply with the noise rating set out in Requirement 26.
- 19.21. The assessment also fails to consider the potential impact of noise on any receptor other than dwellings, so the impact on amenity spaces such as gardens and footpaths which pass close to the site has not been addressed. The assessment has also not addressed the potential impact on non-residential receptors such as wildlife in the surrounding area. Concerns in relation to these matters have also been highlighted in the sections of this report on Ecology and PRow.

- 19.22. The report also raises the question of whether BS 4142 is the appropriate tool to assess the noise impacts in this instance, specifically due to the significant low frequency components of the operational noise and the low background levels of the site. It is suggested that alternative methodologies should have been considered including Defra NNR45 Procedure for assessment of low frequency noise complaints on the basis of absolute noise levels. In the event BS4142 was to be considered as appropriate standard of assessment there are also concerns about the implementation and conclusions of this particular assessment and the underestimation of the noise impact from the substation on sensitive receptors and the amenity of the locality. There are also concerns over the use of BS8233 as an indicator of impact when this standard is out of scope for the situation being assessed.
- 19.23. The Councils are concerned regarding background noise creep. It is noted that the operational noise rating level set by Requirement 26 provides a limit which is applicable for either one project alone or cumulatively for both EA1N and EA2 projects. This limit however represents an increase on the existing background noise level. If the development is consented, the proposal will change the noise climate in the surrounding area. The Councils are aware of existing and potential connection offers being made by National Grid which could result in further development in the locality (see Section 26). Future assessments would then be based on the 'new' noise climate including EA1N and EA2 and result in continued noise creep.

*Compliance with Local Policy*

- 19.24. The Councils have concerns regarding both the construction and operation noise associated with the project and cumulatively with both projects. It is not considered that the application complies with local policy. The developments alone and in-combination would potentially have significant adverse impacts on residential properties, their amenity and the surrounding environment.

## 20.Socio-Economic Impacts

### East Suffolk Council Local Plan Policies

- 20.1. Policy SP1: Sustainable Development, seeks to promote economic activity in the district.
- 20.2. Policy SP8: Tourism, recognises the that tourism is an important element of the district economy. The policy also highlights the East Suffolk *'possesses a high quality built and natural environment rich in history and culture, within easy reach of large numbers of people from within and outside of the area'*.
- 20.3. Policy SCLP6.1: Tourism, recognises that tourism is a substantial and important part of the East Suffolk's overall economy, which brings benefit to quality of life and well-being of communities.
- 20.4. Policy WLP2.2: Power Park, recognises the huge potential for growth in the former Waveney area associated with the development of offshore wind farms.

### Other Relevant Local Policy

- 20.5. The importance of clean energy as an economic opportunity for the region is prioritised in the following key economic policy documents:
- The New Anglia Local Industrial Strategy
  - The Norfolk & Suffolk Economic Strategy
  - The East Suffolk Economic Growth Plan 2018 – 23.
- 20.6. The importance of the tourism sector and the economic benefits that it brings to the local area are also highlighted in the above documents as well as the AONB Management Plan 2018-2023 and the Suffolk Coast Tourism Strategy 2013-2023.
- 20.7. Hardisty Jones Associates Sizewell C Economic Impact Assessment suggest that there could be potential impacts upon tourism and recreation from Sizewell C new nuclear power station during construction and cumulative impacts.
- 20.8. Suffolk County Council Raising the Bar Strategy 2018-2020 aims to promote young people's progression to higher education and to improve youth employment rates.
- 20.9. Inclusive Growth is identified as one of three headline priorities for Suffolk County Council in its Statement of Priorities for 2017 – 2021.

### **Key Local Issues**

- 20.10. The Councils welcome the overall economic opportunity that the construction of EA1N and EA2 will open up for the area and remain committed to working in partnership with SPR to ensure that the potential benefits are fully realised.
- 20.11. The Councils have enjoyed a positive, collaborative relationship with SPR and through the two consented projects of EA1 and EA3, have been able to deliver benefits for the region and SPR through the shared objectives encapsulated in a Memorandum of Understanding.
- 20.12. In our response to the Stage 4 consultation, the Councils highlighted a number of areas in which we hoped to see further action from SPR in order to enhance the local socio-economic benefits achievable.

### *Tourism*

- 20.13. The project alongside other major developments may have the potential to create additional demand for accommodation in the peak tourist season with a potential consequence of either deterring potential tourists due to occupancy rates or driving accommodation prices to a premium.
- 20.14. The Suffolk Coast Destination Management Organisation (DMO) commissioned BVA BDRC in 2019 to evaluate the impact EDF Energy's Sizewell C new nuclear power station and SPR onshore infrastructure associated with EA1N and EA2 wind farms will have on the Suffolk Coast from a tourism perspective. The research involved a visitor survey of both actual and potential regional visitors and a tourism business survey. The survey highlighted that regular tourists who find it difficult to find accommodation will be dissuaded from returning in the future. In the absence of detail regarding where non home-based workers are coming from there is a concern that at certain times of the year this could adversely impact on the availability of tourist accommodation.
- 20.15. The majority of visitors are drawn to the area because of the beauty and tranquillity that it offers with the Heritage Coast and nationally designated landscape of the AONB. With a number of major energy projects being developed along the coast at the same time as EA1N and EA2 (in particular the proposed Sizewell C new nuclear power station), it is likely that this key target market will be significantly impacted. The DMO visitor survey (2019) highlighted that the visitor numbers are likely to drop by 117% - which equates to £20-30 million of lost economic activity in the area.

- 20.16. Emerging evidence from the development of Hinkley Point C highlights the importance of reducing the potential impact of major energy projects on visitor numbers through the proactive agreement of mitigation measures. As such, we are keen for plans to be agreed with SPR in this area as early as possible with an adequate mitigation strategy to offset the anticipated impacts that the projects could have on visitor numbers to the region.

*Local Supply Chain*

- 20.17. Specifically, opportunities exist for local businesses to become part of the onshore and offshore supply chain as demonstrated through the levels of local contract spend for EA1. The Councils expect to see the same positive commitment to maximise local content for EA1N and EA2 and indeed the EA3 development. Associated with this are the likely employment prospects that would be available through this avenue and through the provision of indirect services.
- 20.18. The potential scale of local economic growth hinges on the choice of both base and marshalling ports, which the promotor has not confirmed. However, it is important that the Councils work with SPR to ensure the £30 million investment from EA1 in port infrastructure at Lowestoft and Great Yarmouth is maximised, specifically EA1's Operations and Maintenance base at Lowestoft.

*Skills & Employment*

- 20.19. We are concerned that there is the potential for cumulative pressures on the local labour force, leading to significant workforce displacement and a distorted labour market that will adversely impact local businesses. Significant displacement caused by the cumulative pressures of many infrastructure projects, in particular the proposed Sizewell C new nuclear power station, building in the same timeframe will lead to wage inflation and potentially reduce the availability of local workers, necessitating in the need for non-home-based workers traveling into the area.
- 20.20. There is a high-level ambition to develop a sustainable regional and national supply chain that will require an enhanced education and training offer, providing additional indirect benefits. However, our paramount concern has been that every effort should be undertaken to ensure that a significant proportion of these benefits is localised. Typically, with significant infrastructure projects, the potential positive benefits are regionally felt whilst the negative impacts of the development are felt far more locally.

*Distribution of Benefits*

- 20.21. There is currently little consideration given to the differential impact that the project will have on people and localities across the area and we would like to work with SPR to understand the distributional economic and social impacts of the project and to co-develop a strategy to ensure that the potential benefits of the development are properly shared.
- 20.22. The Councils are keen to ensure that the towns and villages close to the development are able to benefit from new opportunities for training and employment. On a wider level, we are also keen to explore with SPR how the project will help to support our inclusive growth agenda and tackle challenges such as low wages and social exclusion at a local level.

**Adequacy of Application/DCO**

- 20.23. Volume 1, Chapter 30 of the ES provides an adequate assessment of effects, with the exception of the possible impact on tourist accommodation, the wider visitor economy and cumulative effects.
- 20.24. The promotor has not undertaken their own visitor perception survey to assess and measure the tourism related impacts of the proposed development. The reliance on desk-based research and Trip Advisor reviews of wind turbine visual impacts is inadequate and not sufficiently robust. This cannot accurately assess the tourism related impacts of the disruption caused by the offshore and onshore construction work nor can it realistically assess visitor perceptions of the completed windfarms and onshore substations.
- 20.25. The DMO survey (2019) as stated above, identified a potential net drop in visitors to the Suffolk Coast for days out or holidays of 17%. With fewer people prepared to consider visiting during the construction of the projects, fewer trips will happen and BVA BDRC's analysis indicates this will cost the tourism sector at least £24 million per annum. The findings of the DMO's survey have not been addressed within the applications.
- 20.26. The SLVIA identified significant effects from the offshore infrastructure of EA1N cumulatively with EA2 on the AONB. The AONB and Heritage Coast are designations which are currently based on the tranquillity and unspoilt nature of the area. It is this natural asset which tourists come to visit. The Councils are concerned regarding the harm caused to the purpose of the designations and the potential consequential impact on the tourist industry.



- 20.27. The Councils, based on their understanding of the timetable for the proposed construction of the EDF Energy's Sizewell C development, Vattenfall developments, proposed extensions to Galloper and Greater Gabbard windfarms and National Grid Venture's Nautilus interconnector, that there is likely to be a negative cumulative impact with EA1N and EA2. SPR do not fully consider the cumulative impact of the aforementioned projects going ahead in the same timeframe. Due to the negative impact that will be felt in terms of employment displacement and tourism we would expect SPR to seek to mitigate these impacts through their DCO and where this cannot be done, we expect SPR to propose compensation.
- 20.28. We are satisfied that the ES has provided adequate assessment of skills, education, employment and economic development, outside of cumulative impact assessments, and that through continuing development of a Memorandum of Understanding between the Councils and SPR we will continue to work in partnership to maximise the positive local benefits.
- 20.29. We also welcome SPR's involvement in the All Energy Industry Council and their commitment to deliver local content as demonstrated through their signing of the Industry Charter as part of the Offshore Wind Industry Council and the Offshore Wind Sector Deal.

*Compliance with Local Policy*

- 20.30. A number of potential socio-economic benefits have been highlighted above however the Councils remain concerned regarding the cumulative impacts of the projects. Local policy recognises the importance of tourism to the district economy and therefore further work is required to be undertaken by the promotor in light of the findings of the DMO survey (2019). It is essential that the cumulative impacts of the projects are adequately mitigated and/or compensated.

## 21. Traffic and Transport

### East Suffolk Council Local Plan Policies

- 21.1. Policy SP10 'A14/A12: identifies issues regarding the capacity of roads around Ipswich, specifically the A14 between Seven Hills and Copdock interchanges. The Council states that it will work with the adjoining authorities and highways agencies to consider options to improve traffic capacity. The A12 is considered a valuable artery and essential to the economy as a tourist route and to serve the low carbon energy sector. It notes that journey times are hampered by single carriageway sections and reduced speed limits are necessary for maintaining the quality of life in local communities. East Suffolk Council supports improvements to the A12 north of Woodbridge including, as a priority a bypass or other solution for Marlesford, Little Glemham, Stratford St Andrew and Farnham. Improvements to the A12 between Martlesham and the A12 Seven Hills Interchange will be required for proposed strategic employment and housing development.
- 21.2. Policy DM20 'Travel Plans': requires new developments that would have significant transport implications be accompanied by a green travel plan to reduce reliance on motor vehicles. A condition or legal agreement will be imposed to ensure implementation of the travel plan.
- 21.3. Policy SCLP2.2: states that the Council will work with other parties in supporting and enabling delivery of key strategic infrastructure in particular:
- Ipswich Northern Route
  - A12 improvements
  - A14 improvements
  - Sustainable transport measures in Ipswich
  - Improved walking and cycle routes
- 21.4. With regard to Major Energy Infrastructure table 3.6 lists a number of relevant issues that need to be considered:
- Suitability of local roads to cope with the number and type of vehicle movements necessary for construction;
  - The agreement of dedicated routes with local community participation;
  - Need for park and ride facilities;
  - Inadequate provision of laybys on the Suffolk road network; and
  - Cumulative impact of associated growth in and outside Suffolk;

- 21.5. Policy SCLP 3.4 of the East Suffolk Council Local Plan sets out that proposals for major infrastructure projects will be considered against a number of policy requirements, including:
- Appropriate packages of local community benefit to be provided by the developer to offset and compensate the burden and disturbance experienced by the local community for hosting major infrastructure projects;
  - Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;
  - The development and associated infrastructure proposals are to deliver positive outcomes for the local community and surrounding environment;
  - Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and
  - Appropriate monitoring measures during construction, operating and decommissioning phases to ensure mitigation measures remain relevant and effective.
- 21.6. Policy SCLP 7.1 of the East Suffolk Council Local Plan sets out that development proposals should be designed from the outset to incorporate measures that will encourage using non-car modes. The policy goes on to state that development will be supported where:
- It is proportionate in scale to the existing transport network;
  - It is located close to, and provides safe pedestrian and cycle access to services and facilities;
  - It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;
  - It is well integrated into, protects and enhances the existing pedestrian routes and the PRoW network;
  - It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;
  - It will improve public transport in the rural areas of the District; and
  - The cumulative impact of new development will not create severe impacts on the existing transport network.
- 21.7. Policy 7.1 also sets out that development that would have significant transport implications should be supported by a Travel Plan and that for non-residential developments the need for a Transport Assessment will be assessed on a case by case basis.

- 21.8. Policy SCLP 7.2 states that proposals involving vehicle parking will be supported where they take opportunities to make efficient use of land and they include:
- The provision of safe, secure, and convenient off-street parking of an appropriate size and quantity including addressing the need for parking or secure storage for cars, cycles and motorcycles, and where relevant, coaches and lorries;
  - Opportunities to reduce the recognised problem of anti-social parking or potential problems that may arise which impacts the quality of life or vitality of an area for residents and visitors;
  - Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles; and
  - The incorporation of sustainable drainage systems (SuDS), permeable surfacing materials and means of protecting water quality in drainage schemes should be ensured.

### **Other Relevant Local Policy**

#### Suffolk County Council Local Transport Plan (LTP)

- 21.9. The energy coast is recognised in the LTP as one of the key areas for growth and development. Transport should play its part in supporting and facilitating sustainable economic growth by:
- Maintaining (and in the future improving) transport networks
  - Tackling congestion
  - Improving access to jobs and markets
  - Encourage a shift to sustainable travel option
- 21.10. The LTP plan supports:
- The challenge of maintaining the highway in a good condition
  - Seeking improvement to the A11, A12 and A14 connecting businesses and markets to each other
- 21.11. Key relevant transport issues in Suffolk are listed in the LTP as:
- A12 Four Villages Bypass
  - A12 Reliability – flooding due to climate change
  - Congestion on Ipswich Eastern Fringe including A12, A1214 and A14
  - Air Quality in Ipswich and Woodbridge

## Key Local Issues

### *Comparison with EA1 and EA3*

- 21.12. While the EA1 onshore route was longer than that proposed for this scheme, EA1 had multiple accesses spreading traffic across wide areas of the network. This project focuses all traffic on a much more limited number of roads such as the A12, A1094 and B1122.
- 21.13. For EA1 the substation was an extension to an existing site with an extant preferred heavy load route, albeit one compromised by issues on the strategic road network requiring deliveries from the Port of Ipswich to Bramford substation rather than from the south. This change in routing required temporary strengthening of the A137 Wherstead Creek bridge and significant traffic disruption to do this. EA1N and EA2 both require a new substation in a location not served by an accepted heavy load route. The Councils have advised that there is an accepted heavy load route serving Sizewell A and B.
- 21.14. The movement of wide and long loads or these in excess of 44 tonnes, not just the few special order movements (>150 tonnes) is problematic on the existing constrained local road network, particularly on B class roads where the road widths are in places less than 5.5m wide; the width considered necessary for two HGVs to pass (Manual for Streets). Highway structures on A12, A14 to Yoxford, A1094, B1069 and B1122 have not been assessed for heavy loads exceeding 44 tonnes.

### *Network Resilience*

- 21.15. The Councils have raised concerns regarding the resilience of the highway network. The proposals rely on the A12 as the sole HGV route and most will also use the A14 to access. The main issues are:
- Closure of the A14 Orwell Bridge due to collisions or high winds resulting in traffic being diverted through Ipswich,
  - Closure of the A14 or the A12 (north and south of the A14) and lack of suitable diversions,
  - Capacity of junctions on the strategic road network, particularly if delivery of multiple NSIPs coincide,
  - Restrictions placed on the ability to maintain the highway network during normal working hours due to the higher volume of construction movements,
  - Lack of laybys or other suitable parking, rest or stop over facilities east of the A12. With the exception of the A12 north of Seven Hills the local highway

network has few laybys suitable for use by HGVs. There is only a single layby (at Eastbridge) on the combined A1094, B1122, and B1069 routes.

### *Local Road Network*

21.16. East of the A12, except for parts of the B1122 that serve as the access to Sizewell nuclear power stations, the roads are local in nature and not designed for high levels of HGV traffic. Due to the rural nature of the area slow moving agricultural vehicles are common on all routes. Walkers and cyclists use some of the lighter traffic roads especially near the coast.

21.17. Specific issues on the proposed access routes are:

#### A1094

- A tourist, recreational dominated route,
- Significant lengths of speed limits, 40mph between A12 and Snape, 30mph limits through Snape and Aldeburgh,
- Narrow and winding particularly at its western end,
- A number of junctions with sub-standard visibility between A12 and Snape
- Poor horizontal visibility west of Aldeburgh,
- All except the B1121 are classed as zone distributor routes in the Suffolk Lorry Route Map. Such routes directly serve specific locations or local access routes.

#### B1069

- Narrow pinch points through Leiston, including a level crossing,
- No formal pedestrian crossing facilities between community to the west of the road to services on the other side e.g. Primary School,
- Narrow road <5.5m between Knodishall and A1094,
- Urban or semi-urban except for south of Knodishall.

#### B1122

- Despite improvements still a winding route with some junctions with poor visibility (e.g. Mill Lane, Middleton),
- Significant summer use by tourists,
- Variable speed limit along length,
- Passes through scattered communities (Theberton, Middleton Moor).

#### B1121

- Sharp bends in Sternfield,
- Narrow in places,
- Passes through Sternfield and Friston.

*Cumulative Impact (Regional)*

- 21.18. Other NSIPs likely to come forward at around the same time include completion of the EA3 onshore works and construction of Sizewell C. Due to the uncertainty of when, or indeed if any or all of these NSIPs are delivered, at what time and in which order make the Councils task of assessing the cumulative impact and ensuring that the necessary mitigation is delivered in a timely and co-ordinated manner extremely difficult. Significant residential development is also planned for the area with 2,000 homes at Brightwell Lakes at Martlesham.

*Cumulative Impacts (Project Specific)*

- 21.19. The impact assessment presented in the ES considers the proposed EA1N and EA2 projects under two construction scenarios:
- Scenario 1 - the proposed EA1N and EA2 projects are built simultaneously; and
  - Scenario 2 - the proposed EA1N and EA2 project are built sequentially.
- 21.20. If the proposed EA1N and EA2 projects are constructed simultaneously (Scenario 1), depending upon how contracts are let, there could be one contractor for each project, or one contractor for both projects. In addition, the National Grid infrastructure works would be completed separately by contractors appointed by National Grid.
- 21.21. The significant difference in transport terms between the scenarios are the duration of the impact of the schemes and peak HGV/worker trips. Building sequentially would generate a higher total number of trips due to the additional remediation necessary between the two projects and repeated mobilisation. Building simultaneously creates a smaller overall trip total, but a shorter duration and hence higher daily flows, and a greater peak hour impact. It is acknowledged that SPR have included data summarising the worst-case highway impacts in terms of highest maximum daily HGVs (EA1N and EA2 constructed at the same time and create the maximum total daily movements).
- 21.22. Sequential development will create fewer overall construction movements over a shorter time but higher peak movements. This will reduce potential structural damage to the highway network but increase delays and journey times. Individual development will generally result in fewer peak movements reducing congestion on peak days but increase the overall impact in terms of numbers of movements and length of disruption.

*Onshore Construction – Materials and Employee Numbers – Impact on Highway Network*

- 21.23. The construction and use of five new accesses and three crossing points on quiet rural roads will result in an increase in driver delay and an increase in the potential for road collisions as a result of the number of turning movements in and out of the accesses, including the potential for sharp braking as unfamiliar drivers are less likely to expect these conditions.
- 21.24. SPR has provided considerable data on the quantities of materials required, although the sources of such material have not been defined. A worst-case scenario has been assessed with 100% of HGV traffic traveling either north or 100% south of the A12/A1094 junction (26.6.1.3). The assessment indicates across the entire 36-month period (which represents the most contracted build period) for a single project:
- a peak of 210 HGV movements (note – not agreed with SCC)
  - approximately 40,000 HGV movements in total
  - a peak workforce of approximately 490 employees
  - approximately 362 peak workforce vehicle movements
  - a total of approximately 180,000 workforce vehicle movements
- 21.25. The proposals will:
- result in a significant increase in HGV movements on the A12, potentially both to the north and south of Saxmundham.
  - exacerbate pre-existing issues along the A12 route.
  - result in SPR traffic from the south traveling through the four villages (Marlesford, Little Glemham, Stratford St Andrew and Farnham, with negative impacts on air quality, noise, severance, road safety and congestion, especially the pinch point at Farnham bend where large loads manoeuvre very close to buildings.
  - increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1069, B1122.
  - add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich.
  - increase HGV movements along the A12, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.
  - reduce the attractiveness of core strategic routes, such as the A12, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads.



- increase wear and deterioration of roads and structures due to the additional traffic

*Capacity: Junction Modelling*

- 21.26. The junctions for which transport model outputs have been provided are listed below. It is worth noting that the submission does not include any of the traffic surveys, data used to calibrate the junction models or drawings highlighting that the junction geometries used within the model are acceptable. This brings inherent risk to each model and means that the results presented need to be treated with a reasonable amount of caution, above the general risk associated with any transport model.
- 21.27. Reviewing the junction modelling the following points are noted:
- The A12 / A1094 junction is shown to be approaching capacity in the four 'with development' scenarios modelled.
  - The A12 / Ufford Road junction, whilst the junction is shown to be well within capacity, there is a noticeable increase in delay, and whilst in isolation not considered to be a significant impact, the modelling supports the theory that the development will increase delays at sidearms and accesses along the A12, increasing driver delay and frustration and the potential to road collisions.
- 21.28. The A12 roundabout junctions from Woodbridge (A1152) to Foxhall Road, are shown to be at or approaching capacity. Most notably, the development results in:
- The B1079 west approach to the A12 / B1079 roundabout reaching capacity in the AM peak hour and a 40 to 60 second increase in delay on this approach;
  - The Foxhall Road approach to the A12 / Foxhall Road roundabout junction going from being at capacity in the AM peak hour to significantly over capacity, increasing delay by approximately 150 seconds.
  - The traffic flow diagrams at Appendix 26.16 and 26.25 indicates a potential increase in vehicle movements at the B1119 Leiston town centre signal junction of between 151 and 197 vehicles. The junction is known to experience congestion and the development is likely to significantly increase delay and queuing, negatively impacting on the operation of the highway network in Leiston.

*A12 Marlesford Bridge*

- 21.29. Strengthening of the bridge on the A12 at Marlesford is included as an offsite highway improvement to facilitate movements by Abnormal Indivisible Loads (AIL). The promotor has not discussed this matter with the Councils, and we are unaware

of how this requirement has been identified. If such work is found to be necessary, it should be undertaken in advance of any significant construction movements to avoid disruption to a major route required for these.

#### *Local Pedestrian Improvements*

- 21.30. The embedded mitigation proposes improvements to footways in Theberton and Snape.

##### *Theberton:*

- Extension of footway on B1122 near manor cottage
- Uncontrolled pedestrian crossing from near Manor Cottages to Ivy Cottages
- Short section of footway on west side of Church Road.

##### *Snape:*

- Uncontrolled pedestrian crossing and footway outside the church
- Extension of footway outside the petrol station
- Uncontrolled crossing and footway opposite the petrol station.

- 21.31. It is noted in 26.5.1.1, 26.5.1.2 and 26.5.1 that footways are often present on at least one side of the road in many settlements (e.g. Farnham). While generally true the assessment does not state that these footways are often narrow, below the 1.5m width considered necessary in Manual for Streets for two pedestrians to walk side by side or to pass each other. In many cases the footway is immediately adjacent to the carriageway. Being linear settlements, the services that are present are often on the opposite side to many residents. This requires crossing of the road although formal crossing points are sparse.

- 21.32. PRow often start and finish at roads. Where they cross the road, this is not always immediately opposite each other and hence some use of the road network by walkers is necessary to rejoin the PRow.

#### *Road Safety*

- 21.33. With one exception, highway link studies on showed on road where the baseline collision rates exceeded the national average (B1121 links 5 and 7). The A1094 is just below the national average.

- 21.34. The junctions below were examined as collision cluster sites.
- A12/B1119 Saxmundham. Assessed in chapter 26.6.1.10
  - A1094/B1069 Friston. Not assessed further

- A12/A1094 Farnham. Assessed in chapter 26.6.1.10
- A1094/B1069/C247 Sternfield Road, Snape Not assessed further
- A12/B1122 Yoxford Not assessed further

*A12/A1094 Junction Friday Street, Farnham*

21.35. As set out within the consultation document:

*“A total of 17 collisions have been recorded at this junction during the study period, resulting in 16 slight injuries and one serious injury. Eleven of the collisions involved vehicles turning across the path of traffic on the A12; nine of these involved vehicles turning right into the A1094 from the A12, including the serious collision, with the remaining two collisions occurring as vehicles turned right out of the A1094. Six of the collisions were rear end shunt type collisions; three within the central reserve, and three on the A1094 approach to the A12.”*

21.36. Clearly the junction has a history of collisions, most notably relating to right turning vehicle movements across the A12 and it is reasonable to assume that the proposed development will further exacerbate these issues given the increase of right turn movements from A12 south to the A1094 for one project, with a peak daily increase of approximately 105 HGVs right turning at this location. As set out within the DCO submission, the proposed increased use risks a greater frequency and severity of collisions to the extent that it requires mitigation.

21.37. The mitigation proposed and included within the ES includes the following:

- 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.

21.38. The junction already has an existing high standard of signing including a speed enforcement camera, a reduced speed limit of 50mph and the visibility exceeds national guidance. The Councils are concerned about the effectiveness of the current speed limit as numbers are still regularly caught exceeding 50mph.

21.39. Localised junction modelling has been undertaken of the A12 / A1094 junction which indicates between a 100% and a 150% increase in delay for right turning traffic at the junction in the AM peak hour. The road safety poor performance is likely to be a result of difficulty for vehicles to find gaps to undertake turning movements, and this

is indicative of a junction where there is the potential for issues with capacity e.g. the delay at the junction means that drivers are undertaking risky turning manoeuvres. Further to this, the significant increase in HGVs will result in longer queues in the right turn lane as HGVs need greater gaps to undertake manoeuvres.

- 21.40. It is the Councils' opinion that more significant mitigation works are required for the junction. The increase in traffic will still mean that there will be fewer gaps for vehicles to undertake their turning manoeuvres, along with a significant increase in HGVs undertaking the manoeuvres. On top of these impacts is Scenario 1, this includes a cumulative impact assessment with both EA1N and EA2 coming forward at the same time. Appendices 26.25 provide indicative traffic flow diagrams for the cumulative impact of the two developments, these are for the combined average day of the peak, and show, if all materials were from the south a peak impact of 452 daily movements (182 cars and 270 HGVs) at the junction. This may not include the LGV movements nor potential variation in delivery profiles.
- 21.41. The Councils consider the impacts of this project on this junction in terms of road safety are the single most important transport issue arising from this project. We are yet to be convinced that the embedded mitigation will reduce this risk to an acceptable measure and the proposals are unacceptable in safety terms (NPPF p109). However, the Councils are willing to explore other options proposed by the promotor.
- 21.42. EDF Energy have previously consulted on their proposals for Sizewell C, which includes a two-village bypass of the villages of Farnham and Stratford St Andrew. The proposals include a roundabout at the A12/A1094 junction to be delivered in the early years of their programme and the Councils consider that this would resolve any concerns around the junction's historic safety record. However, there is currently no guarantee or timeline for the submission and potential subsequent delivery of their project. SPR and the Councils cannot rely on the two-village bypass being constructed in an appropriate timeframe to support SPR's proposals.

*A12/B1119 Junction Saxmundham*

- 21.43. Nine collisions occurred with a pattern associated with right turns out of the side roads. The number of turning movements is not expected to increase as a result of this project but the assessment does indicate some increase of traffic on the A12 and many of these will be HGVs (20% increase). Therefore, there will be an increase risk that the frequency (total numbers of vehicles) and severity (HGVs) may increase. It is noted that a minor road safety scheme was completed by the LHA at this junction.

Currently, the Councils consider the risks are not of the magnitude to require significant highway improvements.

*A1094/B1121 Junction Friston*

- 21.44. Due to the land rising west of this junction forward visibility for eastbound A1094 traffic turning onto the B1121 is limited. The angle of the junction also makes it necessary for vans and HGVs travelling eastbound to 'square up' to the junction to obtain visibility to the right.

*A1094/B1121 junction Friston*

- 21.45. The embedded mitigation consists of vegetation clearance and temporary over-run areas to allow Abnormal Indivisible Loads movement through this junction, specifically right hand out and left hand in turns to the B1069. No mitigation is proposed for the additional construction traffic going to and from AC4.

*Damage Through Exceptional Use*

- 21.46. Condition surveys will be undertaken by the contractor both prior to the commencement of construction and subsequently at a point close to the completion of construction to identify existing highway defects and any changes following completion of the proposed project. The methodology and scope of surveys will be agreed between the contractor and SCC prior to commencement of construction.
- 21.47. Any damage (the scope of which will be agreed with SCC and the contractor) to the highway caused by construction traffic will be repaired by the contractor or a financial contribution made to SCC to cover the cost of remedial work.
- 21.48. The Highway Authority may also accrue additional costs if the volume of construction traffic requires routine and planned maintenance works to be undertaken overnight to avoid disruption. The Highway Authority would look to recover these additional costs.

**Adequacy of application/DCO**

*Methodology for Assessing Transport Impacts*

- 21.49. The assessment methodology used within the DCO submission relies heavily on GEART assessment method. At previous consultation stages the Councils raised the use of this method as problematic given that it can often fail to fully assess the

specific transport related impacts of development. The GEART guidance is one method of analysing the impacts in terms of risks to receptors it is considered to be a coarse tool which does not sufficiently allow for factors such as junction geometry, design guidance (e.g. visibility) and most importantly the changes in traffic and driver behaviour. Assumptions made for strategic roads considered in the Design Manual for Roads and Bridges may also not be applicable to local roads which will not have been designed to such standards and are unlikely to have facilities for pedestrians found on such roads.

- 21.50. It is noted that similar concerns were raised by Highways England in their response to the similar Norfolk Boreas DCO in Table 24.4 NPS (as stated in Table 26.5) also states that transport assessments should accord with NATA/WebTAG methodology which is more transport specific than GEART.

*Offshore Construction and Operational Transport Issues*

- 21.51. Chapter 26.1 states that ‘no decision has yet been made regarding a preferred base port for the offshore construction and operation of the proposed project. Such facilities would be provided or brought into operation by means of one or more planning applications or as port operations with permitted development rights. The EIA and TA therefore only considers the impacts of constructing and operating the onshore infrastructure, not the entire project.
- 21.52. SPR has stated that foundation components would be manufactured onshore and delivered to site as close to fully assembled as practical (paragraph 39 of Chapter 6.1.6). This also applies to the turbines and scour prevention materials, cable protection, cables and ancillary structures. Further clarity is needed in relation to this claim and whether the consequential impacts on transport have been fully assessed.
- 21.53. The ports likely to be used for offshore construction, Great Yarmouth and Lowestoft are both linked to the Strategic Road Network and are, at least for passenger traffic, part of the rail network. However, without information on the nature and scale of traffic movements associated with the offshore construction, the Councils cannot evaluate the cumulative impact of the whole project. Assessing these through one or more planning applications will create a fragmentary method of assessment and may prevent the appropriate mitigation for the cumulative impact being delivered at the appropriate time.

*Road Safety*

- 21.54. The inadequacy of the embedded mitigation for the A12/A1094 Friday Street junction has been discussed previously.

*Speed Management Proposals*

- 21.55. The embedded mitigation proposes specific changes to speed limits on a temporary or permanent basis. It is noted that temporary can mean up to the 7-year duration of the project, far in excess of the 18-month period for temporary speed restriction orders (Road Traffic Regulation Act 1984 s88).
- 21.56. The promotor has proposed a range of modifications to speed limits on the network any changes that are made to the speed camera at Farnham will have to be undertaken by Suffolk Constabulary. Any resultant costs will need to be met by the promotor through a planning obligation.

*Road Closures*

- 21.57. The DCO makes provision for streets to be stopped up (DCO Schedule 5) yet Table 26.4 states that no roads are to be fully closed to install the proposed cables under the public highway.
- 21.58. It is unclear if stopping up of streets is required solely for access construction. The Councils consider that for practical and safety reasons closure (or partial closure) of Sizewell Gap would not be acceptable at any stage as it forms the sole access to Sizewell B. Closures of the A12 and A1094 would only be considered if restricted to times where traffic flows are low to avoid significant disruption to road users.

*HGV Access Strategy*

- 21.59. Table 26.4 and the Operational Access Management Plan (OAMP) states that:
- All HGV traffic routed via A1094 or B1122.
  - No HGV construction traffic to
    - Use B1119
    - travel via Leiston and Knodishall (B1069)
    - travel via B1121 via Friston and Sternfield
    - permitted to use B1353 to Thorpeness

- 21.60. However, it is unclear if the works on Church Road, Friston and the permanent access AC6 will be accessed via internal haul roads or if some construction traffic will have to use the B1121 through Friston.
- 21.61. Access to Works Plan shows five access points
- AC1 and AC2, both with temporary exits south off Sizewell Gap and accessed via A12, B1122 and Lovers Lane
  - AC3 temporary exits west and east off B1122 Aldeburgh Road, Aldringham
  - AC4 temporary exit east off B1069 Snape Road, Knodishall
  - AC5 permanent access off B1121 Friston
- 21.62. This appears to contradict Table 26.22, figure 26.2 and paragraph 211 of the ES which indicate that only a small length of section 3 will be served by the access off the B1122 Aldeburgh Road and that most of this section would be served by an access west of the B1069 Snape Road which is not shown on the access to works plan.
- 21.63. The use of differing references to the access points within the DCO and supporting documents is confusing and appears to result in discrepancies between the documents with respect to access of work areas between the B1353 and B1069. The Works Access Plan suggests a more significant use of the less suitable access off the B1122 Aldeburgh Road rather than the B1069 Snape Road. If this is the case it undermines the assumptions made for traffic flows in the EIA and Transport Assessment.

#### *Summary of Access Points*

Location	2.4 Access Work Plan	6.2.26.2 Access Locations and Associated Onshore Infrastructure
Sizewell Gap (east)	AC1 – access south	1 – access south
Sizewell Gap (west)	AC2 – access south	2 – access north
B1353		3 & 4 – crossing north and south
B1122 Aldeburgh Road, Aldringham	AC3 – access east and west	5 & 6 – access east and west
Sloe Lane, Knodishall		7 & 8 – crossing north and south
B1069 Snape Road, Knodishall	AC4 – access west <b>No access shown to the east</b>	9 & 10 – access east and west
Grove Road Friston		11 & 12
B1121 Friston	AC5 – access north	13



*AIL Impacts*

- 21.64. Paragraph 26.4.3.1.5 implies that there would be two delivery routes for most AILs required as part of the construction programme:
- Option 1: Lowestoft. This is Highways England's preferred route (HR100) although this is dated and incorrect in some minor details. Due to restrictions, unloading would need to occur on the southern side of the lake. However, there is currently a risk that long-term access cannot be secured.
  - Option 2: Felixstowe via the A14, A12, B1122, B1069, A1094 and B1121.
- 21.65. It is noted that recent AILs have also been recently landed at Ipswich due to issues with structures on the A12 between Ipswich and the M25. Further work is still required on both routes including detailed structural assessment. Although the AIL study (Appendix 26.3) has identified that abnormal loads could come from either Felixstowe or Lowestoft, Network Rail have advised that a rail bridge over the A1094 should be avoided for special order movements. The response from Network Rail in Appendix 26.3 indicates they were only considered the specific special-order load they were consulted on. They imply that no more than 100 tonne loads can be accommodated by the A1094 rail bridge, but this is not explicit as they also state concerns regarding the condition. Therefore, it is unclear if this bridge can carry loads between 44tonnes and 150 tonnes.
- 21.66. The limits on the A1094 rail bridge will result in all special-order movements and potentially other AILs, regardless of origin, travelling via the B1122 from Yoxford and passing through Leiston along the B1069 to the junction with the A1094 where localised widening is required. From this point the vehicle would then travel along the A1094 and B1121 through Friston to access the onshore substation site over the new access road. The Police response in Appendix 26.3 raises concerns regarding parking and that the route through Leiston should avoid this.
- 21.67. The Councils note that 26.4.3.1.5 the promotor considers that it is unlikely that any future special-order movements will be required after completion. The Councils consider that this is unwise and does not consider movements required during decommissioning or if other projects come forward requiring extension of the substation. Temporary widening of the A1094 / B1069 junction only for the construction period is short sighted.
- 21.68. The Councils have significant concerns regarding the route from Felixstowe as it passes through Stratford St Andrew, Farnham, Yoxford, Leiston, Knodishall and Friston with issues such as footbridge on Park Hill, Leiston (height), pinch point on

Haylings Road, Leiston (width) and Farnham (geometry) are well known. Appendix 26.4 includes a swept path assessment of the AILs at the Farnham bend and at the A1094 / B1069 junction. The swept path assessment indicates that AILs can theoretically negotiate the Farnham bend, but with 0.2m (200mm) to spare.

- 21.69. The presence of AILs on the road network is likely to lead to substantial delays for short time periods, however the Councils are concerned that the number of AILs has been underestimated. The presence of AILs will have negative impacts including increasing driver frustration and driver delay on top of those increases associated with the more generic development traffic.
- 21.70. The promotor has not assessed all AIL movements, only concentrating on special order movements.
- 21.71. The Outline Access Management Plan (2.2.8) states the movement of abnormal loads would be outside of the restrictions (routes and times) contained within this OCTMP and should be subject to separate agreement with the relevant highway authorities and police through the Electronic Service Delivery for Abnormal Loads (ESDAL) system. The Councils would need more information on these proposals specifically the timing as we understand that Suffolk Constabulary are only prepared to move AILs in daylight hours.

*Outline Construction Traffic Management Plan (OCTMP)*

- 21.72. The OCTMP only considers onshore construction, not port related construction or operational traffic. The Councils consider that future planning applications should be aligned with the OCTMP so that the full cumulate transport impacts can be monitored and ongoing impacts assessed.
- 21.73. The contractors for EA1N or EA2 and the associated National Grid works have not been confirmed and may differ (8.9 OCTMP para 16 and OTP para 15). In a worst-case scenario this will result in four contractors being required to co-ordinate the Construction Traffic Management Plan(s) with each contractor required to appoint its own CTMP Co-ordinator. Although the promotor would establish the role of the Transport Co-ordinator to take responsibility for the overall implementation of the CTMP it will be difficult to manage such a disparate arrangement.
- 21.74. The OCTMP (para26) states that to secure the required performance standards it adopts a series of 'input' measures, supported by an action plan (rather than finite HGV numbers). A monitoring regime would focus on the delivery of key action plan items as a 'health check' that the contractors are achieving the required standards.

HGV traffic flow forecasts (extrapolated from the ES) are presented as a secondary monitoring indicator. The Councils consider that maximum daily and maximum peak HGV movements need to be embedded within the DCO, preferably by requirement. The daily maximum number of movements of 210 (and average movements across the life of the project).

- 21.75. The booking system for HGVs, which would require appropriate monitoring and reporting to the Highway Authority. The Councils consider that a GPS based system that can locate and track individual vehicles is a better solution enabling proactive management of HGVs, for example in the case of interruption of the highway network and provide factual data in cases where restrictions are breached.
- 21.76. Within the OCTMP it is set out that the following actions are considered to constitute a breach of the CTMP, whereby corrective measures would be required:
- Exceedance of assessed daily HGV numbers (either for individual projects or cumulative affect with EA2);
  - Construction HGV traffic operating outside of agreed hours;
  - Construction HGVs not adhering to the agreed routes; or
  - Construction HGV traffic being driven inappropriately, e.g. speeding.
- 21.77. If the breach is found to be material, a three-stage process is proposed by the promotor, that includes reviewing the data, liaison with the Highway Authority, potential identification of additional mitigation measures, potential removal of the individual committing the breach.
- 21.78. The Councils consider that monitoring and reporting outputs need to be more robust to ensure compliance with the impacts assessed and hence the EIA. These should include the following:
- Progress of the project against specific gateways;
  - Freight movement to/from the site;
  - Details of non-compliance with routing or speed limits;
  - Near misses or safety related incidents;
  - Freight compliance with appropriate exhaust emissions (Euro VI);
  - Transport of AILs to/from the site;
  - LGV movements to/from the site;
  - Employee movement to/from the site, including modal split to ensure compliance with car share targets and in combination monitoring should EA2 project be being delivered commensurately; and
  - Information on complaints received on transport related issues.

- 21.79. The Councils recommend that this is undertaken on a quarterly basis and any non-compliance reported through a Transport Review Group comprised of relevant stakeholders. Quarterly reports should be made available on a publicly accessible website.
- 21.80. The Councils consider the relevant thresholds are necessary to ensure that the impacts considered in the EIA are not exceeded and the embedded mitigation remains appropriate:
- Maximum HGV movements per day (210 single project, 270 together)
  - Maximum HGV movements per hour between 0700 and 0900 and 1600 to 1800
  - Haulage fleet to be 100% compliant with emissions requirements (Euro VI)
  - Car share measured on a monthly basis to not decreased below 1.5 workers per car
- 21.81. Prior to commencement of construction works, it is anticipated the construction contractor would record the condition of roads, tracks, land, fences, etc, by means of schedules and photographic or video surveys. The details of infrastructure (such as water pipes) collated would be reviewed in addition to a review of unrecorded services such as land drains and irrigation systems. The promotor will be expected to provide a financial contribution for mitigating their extraneous impact on the quality and structure of the highway network.

*Outline Travel Plan (OTP)*

- 21.82. To ensure that the final TP can be effectively enforced, it is important to define what will constitute a breach. The following actions are considered to constitute a breach of the TP, whereby corrective measures would be required:
- Construction workers overspill parking on the public highway;
  - Exceedance of assessed daily employee vehicle numbers;
  - Construction employee traffic operating within the onshore development area outside of agreed hours; and
  - Construction traffic being driven inappropriately, e.g. speeding.
- 21.83. The Councils consider that this should be part of the regular report and should include as a minimum:
- Details of non-compliance with routing or speed limits
  - Near misses or safety related incidents
  - Employee movement to/from the site, including modal split to ensure compliance with car share targets and in combination monitoring should EA2 project be being delivered commensurately; and

- Information on complaints received on transport related issues including parking.

21.84. The monthly monitoring report should be submitted to the Highway Authority and a contribution for time and costs associated with reviewing and monitoring by the Highway Authority be paid.

*Obligations*

21.85. The Councils consider that the following contributions are necessary to mitigate the impacts of this project. A further recommendation is that these should be secured through a S106 agreement.

- A contribution towards the additional costs resulting from routine cyclic and emergency highway maintenance costs being restricted to out of hours working times on their freight route.
- SPR will be obligated through the Outline Construction Traffic Management Plan to undertake visual and structural surveys of all routes intended to carry construction HGVs prior to, during and after the construction period and to undertake or pay for the highway authority to undertake any such work that is deemed necessary to return the carriageway to its original condition.
- SPR to pay the Councils a contribution for review of submitted materials for monitoring the CTMP.
- SPR will pay the Councils a contribution for review of submitted materials for monitoring the TP for the life of the project.
- The sum of 7.5% of the total off-site highway works on or before the commencement of construction, to be applied to cover the full audit, legal costs, S278 agreements, dedication of land into highway, land compensation events and supervision fees for the transport schemes to be implemented by SPR under the DCO.
- A contribution should be provided by SPR to mitigate their significant cumulative impact on the east of Ipswich road network.
- SPR will pay the Highway Authority a contribution towards alterations to the speed limit at the A12 / A1094 Friday Street junction and changes in the speed

enforcement equipment. The cost of temporary speed limits will be recovered by other means.

- SPR shall pay the sum to the Highway Authority on or before the start of construction such amount to be used for Leiston safety and capacity improvements to mitigate the impacts of the development along the B1122 and B1069.
- Reimburse the Highway Authority for all costs associated the moving, removing, installed and reinstalling street furniture, streetlights, traffic signals, traffic islands and all other highway infrastructure including structures necessary for safe movement of AIL's and any associated traffic management and temporary traffic orders.

*Compliance with Local Policy*

- 21.86. The Councils consider that the proposals are inadequate in a number of ways including:
- a) no provision for a planning obligation to cover the cost of necessary highways works;
  - b) the provisions for abnormal loads are insufficient;
  - c) the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate to avoid an increase in accidents and that a new roundabout is required, and
  - d) there are too many variables around other energy projects to make the assumptions reliable.
- 21.87. For the reasons set out above the proposal is not compliant with local policy.

## **22.Minerals and Waste**

### **East Suffolk Council Local Plan Policies**

- 22.1. Policy SP12: Climate Change, seeks to reduce waste and promote recycling of materials.
- 22.2. Policy SCLP9.2: Sustainable Construction, requires all new non-residential developments of equal or greater than 1,000sqm gross floorspace to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so. This includes the consideration of waste management.

### **Suffolk Minerals & Waste Local Plan Policies**

- 22.3. Suffolk Minerals Core Strategy (SMCS) Policy 5 seeks to protect mineral resources from sterilisation and allocated sites from other forms of competing development. Suffolk Minerals & Waste Local Plan (SMWLP) Policy MP10: Minerals consultation and safeguarding areas, which will replace Policy 5, also seeks to do the same but extends protection to existing and planned minerals sites.
- 22.4. SMCS Policy DC2 seeks to protect sites of geological or geomorphological interest. SMWLP Policy GP4: General environmental criteria, which will replace Policy DC2, also seeks to protect geodiversity. In both cases Sites of Special Scientific Interest and Regional Important Geological sites are protected.
- 22.5. Suffolk Waste Core Strategy Policy (SWCS) WDM1: Safeguarding of waste management sites, seeks to protect existing and proposed waste management sites from other forms of competing development. SMWLP WP18: Safeguarding of waste management sites, which will replace Policy WDM1, seeks to do the same.

### **Key Local Issues**

- 22.6. The onshore part of the development is within a Minerals Safeguarding Area the purpose of which is avoid sterilisation of minerals resources.
- 22.7. There are geological conservation sites in the area which should be safeguarded.
- 22.8. A check is required to ensure that existing or proposed waste management facilities are safeguarded from the proposed development.

- 22.9. Based on the experience of the SPR EA1 windfarm, a significant amount of aggregate is used to make temporary access roads during construction which requires removal and recycling.

**Adequacy of Application/DCO**

- 22.10. Chapter 18 of the ES - Ground Conditions and Contamination, includes reference to minerals safeguarding and geological conservation.
- 22.11. In respect of minerals safeguarding reference is made to the presence of sand and gravel resources being of regional importance and the reuse of minerals within the development. The ES concludes that there would be a negative impact of minor adverse significance. This is based on the fact that the mitigation embedded in the application would be sufficient to reduce the impacts from a more significant level. The level of significance however can only be known when an intrusive resource assessment of the sand and gravel within the site has been carried out.
- 22.12. It is acknowledged however that existing mapping and historical patterns of extraction within the County indicate that significant viable sand and gravel resources are not likely to be present. Parts of the cable route are also particularly constrained in terms of ever being viable minerals resources due to factors such as being within the AONB for example. Therefore, the development is compliant with SMCS Policy 5 and SMWLP Policy MP10.
- 22.13. The Thorpeness County GeoSite mentioned in the ES would not be directly affected as the cabling will pass underneath it at depth, therefore the proposal is compliant with Policies WDM DC2 and SMWLP GP4 e).
- 22.14. In respect of existing and proposed waste management none are affected by the proposed development therefore SWCS Policy WDM1 and SMWLP Policy WP18 are complied with.
- 22.15. Recent evidence suggests that local contractors are capable of taking away Type 1 aggregate used for temporary construction roads for recycling. Although not specifically mentioned in the ES this is not contrary to any SWCS or SMWLP policy and in accordance with East Suffolk Development Plan policies SCP12 and SCLP9.2. The Construction Management Plan will also include further provisions for waste management and likewise would fit with Development Plan Policy.



*Compliance with Local Policy*

- 22.16. As outlined within the above text, the development is considered compliant with local policy.

## **23. Water Quality and Resources**

### **East Suffolk Council Local Plan Policies**

- 23.1. Policy SP12: Climate Change, seeks to reduce the use of natural resources and to minimise the risk of pollution.
- 23.2. Policy SCLP9.7: Holistic Water Management, states that all new developments will incorporate water efficiency and re-use measures, inducing but not limited to:
- greywater recycling;
  - rainwater harvesting; or
  - water use minimisation technologies.
- 23.3. Policy SCLP10.3: Environmental Quality, states that development proposals will be considered in relation to their impact on water quality and the achievement of Water Framework Directive objectives.

### **Key Local Issues**

- 23.4. Impact on the water quality has not been identified by the Councils as a likely significant effect of the development, although additional consents are relevant to this issue. As an example, Suffolk County Council is responsible for issuing Land Drainage consents under the Land Drainage Act 1991 for works affecting ordinary water courses where there is no Internal Drainage Board. In issuing consents Suffolk County Council will need to ensure that any works permitted are Water Framework Directive (WFD) compliant.

### **Adequacy of Application/DCO**

- 23.5. Requirement 22 provides for a CoCP. The Outline CoCP includes measures to treat surface water runoff prior to discharge. However, some of these options do not use SuDS methods and rely on the use of proprietary products, as was the case for EA1 construction. It is unclear if the promotor's proposals allow for sufficient space within the red line boundary for the use of SuDS to be prioritised for the purpose of surface water treatment.
- 23.6. No measures have been proposed to re-use surface water runoff to reduce the developments water supply needs, neither during construction nor operation, contrary to local policy.

*Compliance with Local Policy*

- 23.7. It is likely that local policy compliance can be achieved post consent through the agreement and implementation of an appropriately detailed CoCP. The Councils would however like to see the promotor identify whether it is possible to re-use surface water runoff to reduce the water supply needs.

## **24.Approach to Preparatory and Construction Works in Specific Locations**

- 24.1. There are specific points along the onshore cable corridor where the Order Limits are constrained and/or the construction works will occur very close to residential properties i.e. area south of Sizewell Gap Road, Hundred River Crossing and at Friston. Further work is necessary, to understand how construction and pre-construction works in these areas would be managed, to minimise harm to environmental assets and local amenity.
- 24.2. It is recommended that an additional section be included within the OCoCP and post consent within the CoCP to provide specific measures which will be utilised to manage the pre-construction and construction works within these sensitive areas. Where the onshore Order Limits are in close proximity to residential properties additional measures could be undertaken to reduce disturbance from noise and dust emissions for example.

## **25.Co-ordination and Cumulative Impacts**

### **Key Local Issues**

- 25.1. The promotor is bringing forward two schemes EA1N and EA2 as two separate projects that can be implemented simultaneously or in sequence. In the latter circumstance, the first scheme could be implemented, and the land restored before the second project commences, disrupting the same communities and environment again. This contrasts with the approach taken by SPR in connection with the EA1 and EA3 developments where the ducts for the second project were installed at the same time as the first project, leaving the second scheme to only need to pull cables through the ducts during implementation without having to dig up the entire cable corridor for a further time.
- 25.2. SPR has recently announced that they intend to combine, if consented, EA1N, EA2 and the consented EA3 wind farm into one single delivery programme creating the East Anglia Hub. This announcement however does not secure the simultaneous implementation of the projects through the DCOs so there is no ability for the Councils to ensure this approach is undertaken. Given this announcement we would expect greater coordination during construction for the projects in particular the first project ducting for the second project. This recent announcement also introduces the potential for cumulative impacts between EA1N, EA2 and EA3.
- 25.3. In addition to consideration of the cumulative impacts of EA1N, EA2 and EA3, EDF Energy plan to submit a DCO application for Sizewell C in the first quarter of 2020. The Stage 4 consultation documents identified 2021 as the earliest start for construction.
- 25.4. If the applications for EA1N, EA2 and Sizewell C are all consented, this would result in East Suffolk experiencing the disruption of four nationally significant infrastructure projects being constructed simultaneously. It is therefore essential that the full cumulative impacts of the projects are fully assessed with adequate and appropriate mitigation secured as required.

### **Adequacy of the Application/DCO**

- 25.5. The Councils have continued to urge SPR to commit to a more integrated and efficient approach to developing the two projects, if consented, in order to lessen the detrimental effects which will be experienced during construction.

- 25.6. Section 1.4 of the Scheme Implementation Report (8.19) details the “Early Implementation of Sections of the Onshore Cable Route”. Requirement 11 “Stages of authorised development onshore” allows the stages of works to be approved by East Suffolk Council. It is understood for example that one project could lay the sections of ducting for another providing all the requirements in relation to both projects which would allow the works had been discharged. It is agreed that this allows flexibility and does not prevent the ability for greater coordination between the projects however this only makes this an option for the promotor and does not secure a coordinated delivery of the projects.
- 25.7. No account has yet been taken of the cumulative impacts of EA3 windfarm in addition to the EA1N and EA2 projects during construction. The cumulative impacts of the construction of these projects is therefore not yet known.
- 25.8. The submission documents acknowledge the need to cumulatively assess the projects with EDF Energy’s proposed new nuclear power station, Sizewell C. The promotor will need to update their cumulative assessment as more detailed assessments are published by EDF Energy to ensure their assessments are up to date. The current assessments are based on the material published by EDF Energy during their Stage 3 consultation. The full cumulative impacts of the projects with Sizewell C are therefore not yet known.

## **26.Cumulative Impacts with Future NSIP Projects**

### **Key Local Issues**

- 26.1. There are a number of additional NSIPs which are also within the pre-application stage of the consenting process. The Councils are also aware of two interconnector projects (Nautilus and Eurolink) proposed by National Grid Ventures to be connected to the National Grid around Sizewell. The Nautilus project has sought and been granted consent to be considered under the NSIP regime.
- 26.2. In addition to these projects which already have connection offers within the same locality as the current project, the extensions to Greater Gabbard and Galloper have progressed beyond the Crown Estate's plan level Habitat Regulations Assessment process and are likely to commence public consultation in 2020. Although the grid connection offers for the extensions projects have not been confirmed, it is known that the National Grid substation will be the principle determinant for the location of these schemes, given the need to achieve an efficient economic and coordinated transmission system.
- 26.3. Therefore, given the likely need for all these future projects to connect into the grid via the new National Grid substation proposed at Friston, the Councils are concerned that the full cumulative impacts of all these projects are not being considered in the assessments. It is understood that each additional connection would require further extension of the National Grid Substation with further bays. The Councils' understanding is that a substation bay consists of a combination of high voltage and low voltage switchgear, a transformer and protection and control, which together are required to connect a renewable energy generator or a distribution system to the transmission network.
- 26.4. The promotor is seeking a seven-year time limit for the implementation of the consent. This is longer than the five-year typically awarded time limit. The additional length of time applied for will increase the likelihood that the projects identified above from being brought forward within this timeframe and therefore increase the likelihood of cumulative effects.

### **Adequacy of Application/DCO**

- 26.5. The application does not adequately address the cumulative impacts of future projects. This is of significant concern in relation to the substation site immediately north of Friston village. With knowledge that National Grid is offering connections to the Grid at this location, our concerns increase. The site is being seen by National

Grid as a strategic connection point for future projects without the potential impacts being cumulatively assessed and without any of this future development being considered within the existing masterplan for the site.



## **27.Planning Obligations for Mitigation/Compensation**

- 27.1. SPR are of the view that they have submitted a robust application with built in mitigation to address any impacts arising and as such do not, at this time, believe additional mitigation is required. For this reason they argue it would not be appropriate to provide a Section 106 under the Town and County Planning Act 1990 as such an agreement would not be 'necessary to make the proposed development acceptable in planning terms', one of the tests set out in the Overarching National Policy Statement – EN1 (NPS EN-1).
- 27.2. The submitted applications however identify significant residual impacts as a result of the development. It is therefore the Councils view that these residual impacts should be appropriately mitigated and, if this is not possible, compensated for in line with the mitigation hierarchy which requires the promotor to avoid adverse impacts, and only if the impacts cannot be avoided should minimisation and mitigation be considered. If it is not possible mitigate the impacts, compensation should be considered.
- 27.3. SPR has however proposed agreements under Section 111 of the Local Government Act. For EA2 SPR has committed to provide funding to address a number of the significant effects identified in the ES which relate to the substation, onshore cable route and offshore infrastructure's impact on the AONB. For EA1N the promotor has committed to a s111 fund to address the residual significant effects identified within the ES which relate to the onshore substation and onshore cable route. The difference between a s111 and s106 is that under a s111 no direct link between the proposed development and the compensatory measures must be demonstrated and therefore the funding would not be a material planning consideration.
- 27.4. A s111 agreement is also not an obligation on the application land and is not therefore transferred with any change of ownership. Future transfer of ownership, of the offshore transmission infrastructure and substations is required, by the Office of Gas and Electricity Markets (OFGEM), when construction of the projects is complete. It is however understood that there are mechanisms which could be utilised to secure the delivery of the s111 agreements.
- 27.5. Notwithstanding the potential s111 agreements, it is the Councils view that the promotor should seek to address the residual impacts of the projects through a s106 which meets the appropriate tests and is directly linked back to the impacts of the projects.

## 28.Summary

- 28.1. The Councils have reviewed the application and evaluated the impacts in the context of local planning policy and other relevant policy, highlighting policy compliance within the different sections of the report.
- 28.2. The Councils have highlighted a number of areas where the application, as currently submitted, is not considered to be compliant with local policy. The assessment of the impacts has been topic based for ease of reference.
- 28.3. The Councils wish to highlight the overall in-combination impacts which would be experienced on the environment and community around Friston. The project alone and cumulatively would result in detrimental impacts on:
- landscape and visual amenity;
  - heritage assets;
  - noise;
  - PRoWs; and
  - Potentially flood risk.

Which when taken together, would have a significant adverse impact in respect of the sensitivity of the receiving landscape, local residents and visitors. There is insufficient commitment within the submission to secure minimisation of the scale and impacts of the substations and address the future expansions of the site. The mitigation proposals presented to date do not satisfactorily address the Councils concerns.

- 28.4. In addition to specific impacts around the substation site, other areas of concern include:
- AONB - impacts on designated landscape resulting from the offshore infrastructure;
  - Air Quality - cumulative impacts and mitigation proposals;
  - Ecology – receptors not all fully assessed or insufficient mitigation proposed;
  - Flood Risk – drainage
  - Coastal Change – impact of HDD on stability of cliffs, crag outcrop and wording of requirements;
  - Archaeology – limited level of detail
  - Landscape – impact visually and on character by virtue of loss of hedgerows/trees;
  - PRoW – insufficient assessment of impacts on amenity and quality of user experience;

- Traffic and Transport – unresolved concerns including AILs and A12/A1094 junction safety concerns;
- Socio-economic – cumulative pressures and impact on tourism following DMO survey (2019);
- Co-ordination between the projects;
- Cumulative impacts with other major development projects;
- Mitigation and compensation delivery mechanism.



## CABINET

Tuesday 7 January 2020

### HOUSING DEVELOPMENT STRATEGY 2020 - 2024

#### EXECUTIVE SUMMARY

1. The Council has, over recent years, committed itself to developing new Council housing through the Housing Strategy and the Housing Revenue Account (HRA) Business Plan.
2. A Housing Development Strategy has been written to provide structure to the Council's intention to build new Council homes and redevelop existing housing stock. The Strategy addresses the approach the Council will take to help achieve its objectives and bring transparency to the process.
3. In recognition of the Council declaration of a climate emergency the Strategy addresses issues of sustainability and the environment.

Is the report Open or Exempt?	Open
<b>Wards Affected:</b>	All
<b>Cabinet Member:</b>	Councillor Richard Kerry Cabinet Member with responsibility for Housing
<b>Supporting Officer:</b>	David Howson Housing Strategy Manager 01502 523146 <a href="mailto:dave.howson@eastsoffolk.gov.uk">dave.howson@eastsoffolk.gov.uk</a>

## **1 INTRODUCTION**

- 1.1 In the current Housing Strategy and HRA Business Plan the Council has committed itself to developing new council homes in the district, with 54 units built in 2019. The HRA Business Plan has a target to develop 50 properties each year to 2023.
- 1.2 The number of new developments and the large sum involved (£47m budgeted for between 2017 – 2023) requires a greater strategic approach to housing development in East Suffolk, particularly when the Housing Strategy and HRA Business Plan identify development as one of the Council's key priorities.
- 1.3 The Housing Development Strategy intends to clearly consider how various aspects of development and redevelopment in East Suffolk can help the Council meet their stated objectives in building more Council new homes for the residents of the district.

## **2 THE STRATEGY**

- 2.1 The Housing Development Strategy covers the period 2020-2024 and considers the Council's housing development objectives over this time. It reviews the approach to new build properties including the Council's commitment to shared ownership and the use of S.106 (planning obligation) funding to help sustain the Council's development programme.
- 2.2 The document also discusses redevelopment of the Council's housing stock and the role of council housing development in the regeneration of areas in the district, as well as the importance of land and property acquisition if the Council's housing development aspirations are to be achieved. This would include the buy back of former Right to Buy Council housing.
- 2.3 The Strategy states the Council's position on viability and affordability together with a risk assessment to ensure that all developments by the Council are properly managed and risk minimised. Matters such as housing investment and funding sources are addressed within the document that ensure that the Council is assured of a developments' viability.
- 2.4 The design of new developments and procurement of contracts is considered as well as the important role of communication and tenant involvement in the development process.
- 2.5 The Strategy also addresses sustainability and greener development, considering issues such as environmental impact of developments, reducing the long term carbon footprint of residents and exploring new innovative ideas in our developments.
- 2.6 The Strategy follows other housing related strategies in identifying actions to ensure the document's outputs are clearly stated and understood. The actions are highlighted throughout the Strategy and summarised at the end of the document.

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

- 3.1 The East Suffolk Business Plan's Vision includes 'the need for new homes that are affordable and local to our communities', and one of the critical success factors is 'Improved access to appropriate housing to meet existing and future needs, including more affordable homes for local people'. The Housing Development Strategy seeks to meet these objectives as well as those stated within the Housing Strategy to help deliver

good quality affordable homes that improve living conditions for members of the community.

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

- 4.1 The Housing Development Strategy considers the approach the Council will take to future housing development in the district. Although the document considers resources as part of an effective strategy, there are no financial implications with the adoption of the Strategy. The Strategy does however consider the need for any development to have a comprehensive financial viability assessment to ensure the Council's interests are protected. Additionally, governance over any future development will be provided by each scheme complying with the corporate risk assessment requirements and Cabinet approval being given before a contract is entered into.

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

- 5.1 This report has been prepared having taken into account the results of an Equality Impact Assessment and no negative impact has been identified.

#### **6 CONSULTATION**

- 6.1 The Strategy has been prepared following consultation with the Council's Planning and Asset Management teams

#### **7 REASON FOR RECOMMENDATION**

- 7.1 The Strategy outlines the structure on which the Council's Housing Development can be built upon to achieve the objectives outlined in the Housing Strategy and Housing Revenue Account Business Plan.

#### **RECOMMENDATIONS**

That the Housing Development Strategy 2020-2024 be approved.

#### **APPENDICES**

<b>Appendix A</b>	Housing Development Strategy
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#### **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
3.10.2019	Equality Impact Assessment	David Howson

# Development Strategy 2020 - 2024



# Foreword

I am delighted to introduce our Housing Development Strategy for 2020 – 2024. This is the first time East Suffolk has had a strategy of this kind, underlining how important we think it is to improve our residents' quality of life by building new homes. Like many councils across the country, we know that we must adapt our approach to housing development and increase our capacity to meet the undeniable need for new homes in our district. Our Business Plan and Housing Strategy have embraced the drive to provide more affordable homes and this Housing Development Strategy confirms our commitment and approach to building and acquiring properties and land in East Suffolk.

In July 2019, East Suffolk Council unanimously voted to declare a climate emergency. We recognise that development has a major part to play in supporting the Council to achieve its commitments to step up its positive work on environmental issues, to reduce its own carbon emissions and to encourage communities to help fight climate change. This strategy sets out our commitment to provide exemplar affordable housing and encourage other housing providers and developers across East Suffolk and beyond to strive for a greener approach to both existing accommodation and new developments.



**Cllr Richard Kerry**  
Portfolio Holder for Housing



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# Introduction and links to the Council's strategies

The objective of this East Suffolk Housing Development Strategy is to meet housing need by providing high quality sustainable housing at affordable rents or sale values and to develop appropriate housing solutions in all areas of East Suffolk which are effective and cost efficient.

Recent changes in Government policy have encouraged councils to build housing, using surpluses within our Housing Revenue Account (HRA) and increased borrowing by lifting the borrowing cap. The HRA Business Plan (2018-48) provides details of the financial implication to the Council with our debt being managed to sustain a new build programme of 50+ new homes each year to help overcome the serious shortage of both general needs and specialist housing in our area. Our current Housing Strategy projects us enabling up to 250 new affordable homes each year to 2023 and clearly states our intention to support development of homes across all tenures to meet the need of our communities across East Suffolk.

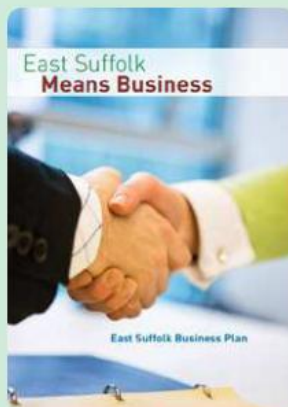
This Housing Development Strategy sets out our general position on developing our own housing for the next 5 years. It considers how we will ensure that we deliver high quality affordable homes in a cost-effective way. The Strategy will form the framework within which East Suffolk will evaluate development opportunities and will inevitably evolve as plans evolve and will be formally reviewed on a biennial basis. The strategy will also support the delivery of the Local Plans. The Local Plan for the former Waveney area was adopted in March 2019 and a new Local Plan for the former Suffolk Coastal area is well advanced.

The strategy is intended to be clear and easy to understand. Where appropriate an action is identified on the right of the page in a blue box. This ensures that the strategy is focussed on the objectives we have set ourselves and is transparent to our readers. The Action Plan is summarised at the end of the document.

In our corporate **Business Plan** we set out a clear vision for East Suffolk to “maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk”.

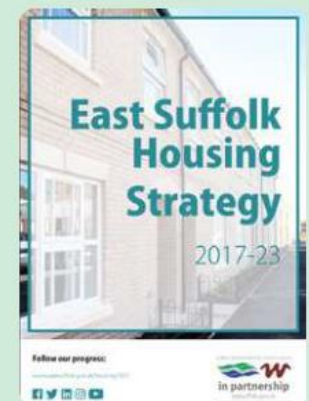
The vision specifically seeks to “.....address some significant local challenges, such as the need for new homes that are affordable and local to our communities....”

This business plan is the driver for the ‘Golden Thread’ of development in East Suffolk.

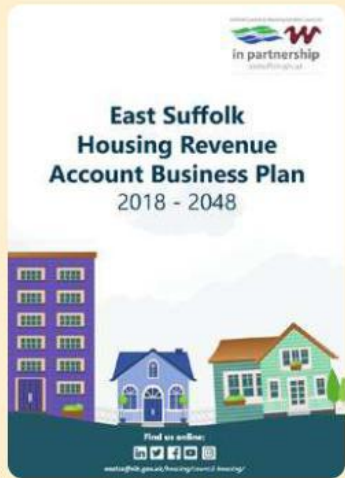


The **Housing Strategy** identified 9 housing priorities of which four are directly relevant to this Strategy, emphasising the importance of new homes:

1. Increase the amount of Council owned affordable housing from 4,479 homes to 5,200 including development on Council-owned and exception site land;
2. Using the strength of our Housing assets to intervene assertively in the delivery of the Lowestoft and Outer Harbour Area Action Plan;
3. Increase the number of affordable homes by 250 units each year;
4. Actively support the broader supply of housing to ensure East Suffolk is the preferred location for private developers and housing associations.



# Associated council strategies



Our **HRA Business Plan** is a key document in relation to the development and redevelopment of our housing stock. It considers the financial viability of investment in new homes and the numbers to be developed as well as their locations in the short to medium term.



**The Housing Asset Management Strategy** (HAMS) considers how our housing stock is managed and the programme of investment linked to the HRA business plan.

Its primary consideration is the investment in our current stock to ensure our housing assets are kept to a good standard. It does also address new development and redevelopment of the housing stock and is therefore directly linked to this Housing Development Strategy.



**The Homelessness and Rough Sleeping Strategy** outlines our current priorities to prevent and reduce homelessness. This would include actively encouraging more affordable homes being built to house more people.



**The Private Sector Housing Strategy** focusses on the private sector in our district but refers to joint working with the rest of the Housing Service on bringing long term empty housing into use again and the redevelopment of HMOs in our district which has been successfully trialled in Lowestoft.



**The Housing Enabling Strategy** considers the corporate approach to enable new development in East Suffolk.

# Development objectives

**Our purpose:** To directly provide, facilitate and enable good quality affordable housing which sustainably meets the current and future needs of local communities throughout East Suffolk.

One of the major challenges facing us is how to increase the supply of affordable homes across our district. Our primary objective is to provide new homes to meet demand. We will, wherever possible, create new homes that are suited to those with needs which are not being met by existing housing or new build. This will be informed by a broad range of evidence including the Council's Housing Register.

In order to provide new homes we need;

- a) land and/or properties
- b) Internal and external resources to undertake a variety of work including pre-construction, legal and valuation work
- c) Contractors and developers to undertake the construction of the new homes

To address the need to grow development capability we have created a new Housing Development Team to co-ordinate work, supported by specialist consultants. We know that the challenge of our commitment to develop new homes and facilitate alternative providers building homes is not yet matched by our internal resource. Further resourcing of the Development Team is recognised as being important to meet the challenging targets set out in the Housing Strategy and HRA Business Plan.

We will aim to maintain a rolling 3-year plan of realistic development opportunities which will include enough sites to meet the HRA Business Plan projection of 50+ units a year. We seek to identify a pipeline of sites looking forward 3 years which will include undertaking strategic reviews of areas where there are significant Council land holdings.

The Council has a corporate responsibility to ensure that it is making best use of its own assets. It is the intention that going forward we will retain land in our ownership and develop homes to add to our housing stock where it is economically and socially viable to do so (although on larger Council owned sites it is likely that only a percentage of the site will be developed for new Council housing.)

## Our Actions

**1 - Build the capability within the Housing Development Team to deliver a successful development and enabling programme.**

**2 – Develop and publish a 3-year rolling development programme with an objective of achieving 50+ units p.a.**

**3 – Review corporately all Council land ownership to identify potential housing development sites for new Council housing.**

# Environmental Sustainability and Development Outputs

## Sustainability and Greener Development

Environmental sustainability is essential in the creation of homes and communities in which people want to live and work. Lowering our carbon footprint will help our tenants save money and deliver lasting environmental, social and economic benefits.

We recognise that our extensive housing stock and new development have a carbon footprint, and can have a significant environmental impact through the consumption of energy and water, the use of transport and materials, and the production of waste. We aim to deliver new development in line with the principles of our Environmental Policy, and the policies included within the new Local Plans. We recognise that providing environmentally friendly homes is only part of the solution; we seek to provide our residents with the right tools to help them understand how to save energy and money.

Sustainability also relates to ensuring that the homes we provide meet a need and we will rely on evidence to support the building of the right homes regarding mix and tenure in the right locations. We will consider not only the environmental impact of any new development but also the health and wellbeing of our tenants who will be living there, together with the positive impact of greener design on people.

Initial feasibility assessments will determine the environmental impact of all potential development opportunities. The Council seeks to support well-designed accommodation which conserve natural resources whilst providing successful residential developments. The building's lifecycle from inception to completion, occupation and beyond will play a key role in the consideration of development opportunities ensuring accommodation is both suitable and sustainable.

The Council seeks to explore the use of greener building technologies both within the construction process and finished properties. We strive to explore innovative design ideas which recognise the benefit of Passive House principles and the value of carbon natural design. The specification of our developments will focus on the benefits of natural light and ventilation, access to open space and well considered orientation and outlook.



## Our Actions

**4 - Ensure that environmental impacts are taken into account in all initial feasibility assessments on potential development and redevelopment projects.**

**5 - Investigate energy efficient and sustainable approaches to development and consider options to deliver new housing and individual remodelling projects to achieve carbon neutral or passive house standards where practicable and cost effective to do so.**



# Environmental Sustainability and Development Outputs

## Quality

We seek to provide a high-quality home that meets the needs of our tenants. This is a principal that we have adopted over many years for our existing housing stock that we take a real pride in.

We aim to provide housing that is efficient and affordable to run for the occupants, as well as being easily managed and maintained by ourselves. We have been aware for many years of the issues of fuel poverty for our tenants and will continue to build on the achievements we have made so far in seeking to improve energy efficiency and reduce tenant costs.

## Value for Money

It is always important that we can demonstrate in the early stages of planning that any development offers value for money. We will consider the expected 'life' of the housing asset and the likely income and expenditure over that time to achieve value for money. This is important as it ensures that the HRA remains a viable budget for the Housing Service within the Council. A guideline we will follow is a 30-year payback period but we will always consider other social and economic issues that would justify an extended payback period such as ensuring superior quality or environmental sustainability.



# New Build

Our Housing Strategy identifies a broad need for new affordable homes for rent. A large proportion of these need to be 1 and 2 bedroom properties, reflecting the large proportion of single people and couples within the existing Council housing stock who may relocate and free up larger properties, creating more efficient use of our properties. To meet need in our district a variety of dwelling types and sizes will be built but the priority will be to provide smaller family houses and accommodation.

We will also seek to provide homes for shared ownership (a form of low-cost home ownership). The Council's Strategic Housing Market Assessment report has identified of all the homes required by 2036 the need for this type of tenure is not insignificant (9% within the former Waveney area and 7% within the former Suffolk Coastal area). Our own shared ownership units will help meet this need and will attract grant funding from Homes England as well as helping to cross subsidise the rented housing being provided by us. We have received funding from Homes England's SOAHP programme (2016-21) to build a small number of shared ownership homes over the next 3 years to 2021 ensuring a range of housing solutions are provided for our local communities.

We will consider acquiring Section 106 new build properties on new developments (a s106 is a legal agreement between the Council and developers linked to planning permissions and can also be known as planning obligations) to help us meet our challenging development objectives, subject to the properties meeting our desired standard and requirements. This has not occurred frequently in the past but it is recognised that housing associations alone have a limited capacity to acquire affordable housing, as well as sometimes being reluctant to invest in the more remote rural parts of the area and smaller schemes. The Council will continue to work closely with housing associations to encourage them to provide new affordable housing in the district. Where commuted sums are received these provide further opportunities for the delivery of affordable housing by the Council or other registered social landlords.

The provision of more homes across the north of the district will be given initial priority as most affordable land opportunities are in the Lowestoft area where an existing management and maintenance structure exists, but we also recognise the need and opportunities to develop in the south of the district to spread our housing stock over the whole district, and extend our management and maintenance services accordingly.



## Our Actions

**6 - Develop a 3 year indicative programme of shared ownership and shared equity housing across the district and publish it annually.**

**7 - Consider all developments with S106 new builds to consider viability.**

**8 - Potential development sites across the district to be reviewed and negotiations to be carried out following necessary approvals.**

**9 - Establish effective working relationships with a range of development partners.**

# Redevelopment and regeneration

Redevelopment and regeneration seeks to provide better quality affordable housing as well as increasing the amount of affordable housing contributing to the objectives of the overarching development programme.

The redevelopment programme can be split into two main areas; stock rationalisation of our existing HRA stock which aims to optimise accommodation which is no longer fit for purpose or underutilised, and the proactive acquisition of redevelopment opportunities within the district to provide additional affordable housing whilst also contributing to the physical and economic regeneration of the district.

## Stock Rationalisation

The programme seeks to identify our HRA assets which are underused, unoccupied or less popular. These are collectively known as 'underperforming assets' and takes into account the popularity of the building through Gateway to Homechoice (our shared choice based lettings scheme), the quality and cost of the building to us, and the projected life span of the building.

Assets are reviewed identifying the strengths, weaknesses, opportunities and threats of potential development solutions. Recommendations are evaluated based on their financial, political and social implications to the community.

The programme aims to ensure the longevity of the HRA stock and generate wider financial efficiencies through the forward projection of maintenance, improvements and building lifespan. Rationalisation of stock allows us to repurpose accommodation to ensure we have the right type of housing in the right locations.

## Example 1: Staithe Road, Bungay

The Council had experienced long term issues with a large house sub-divided into three flats but with only one occupied. It was decided that the modernisation of the flats may still be difficult to let and therefore a decision was made to revert the building into an original large detached house with parking and two adjacent bedsits to be integrated into the development as well. The property was then placed on the open market to bring a capital receipt to the Council.

## Example 2: Avenue Mansions, Lowestoft

This former Retired Living scheme in Lowestoft was a popular scheme but was a large former Victorian hotel that had become difficult to maintain and heat. Residents were sympathetically relocated to areas of their choice and supported in the process. The empty property will be considered for other alternative uses such as specialised housing or prepared for sale on the open market.

## Our Actions

**10 - Establish the means to monitor and assess existing Council assets and potential acquisition opportunities for redevelopment.**

**11 - Improve the efficiency of the housing stock. Reduce the level of under-occupation, helping to alleviate the housing burden on the Council.**





# Redevelopment and regeneration - continued

## Proactive Acquisition

Working in partnership with the Council's Economic Development and Regeneration teams we have taken the decision to proactively intervene in the redevelopment of strategic sites within the district. The programme explores housing development opportunities which require the acquisition of property or land and seek to address a wider regeneration aspiration throughout the district. Available assets are reviewed, and business cases are formulated outlining potential opportunities.

The Council remains mindful of the impact of this programme on the private market in terms of private developers, land values and properties prices. The approach to intervene will only be taken where there are additional benefits which can be realised from purchases and there is a wider strategic ambition which can be achieved through this process. Proactive acquisition will provide redevelopment opportunities which may be less financially lucrative to the HRA than other development opportunities, however these proposals will be considered in conjunction with the potential social benefit and wider financial efficiency savings they may deliver to the Council. Such acquisitions will include former Right to Buy purchases on the open market which fit within our portfolio as well as sitting within existing estates etc to minimise maintenance and management costs.

The Private Sector Housing Team is committed to improving the standards of private housing and the acquisition of a property as a sanction is an essential aspect of their current policy. This programme seeks to assist the team with their ambition to remove unsafe or unoccupied properties from the private market whilst also offering a redevelopment opportunity and providing much needed affordable housing.

## Our Actions

**12 - Deliver a range of accommodation to help our partners meet their statutory responsibilities and reduce the burden on the public purse. This would include a proactive Right to Buy buy-back where appropriate former council housing comes on the market.**

**13 – Increase the number of units affected or created by the redevelopment programme to 30 per annum by 2021.**

### Example 1: Former Post Office – Lowestoft

The property and surrounding site was purchased in 2018 by Waveney District Council. The project scope includes the design and delivery of a town centre regeneration development seeking to provide a mixed-use scheme of commercial and residential accommodation.

Demolition of some structures to the rear will be required. The proposed development will require an element of conversion and new build construction. This scheme received approval to the pre-application stage in July 2019.



### Example 2: 560 London Road South – Lowestoft

Close co-operation across the Housing Service has sought to address poor quality HMO properties in our district. Following the success of this substandard HMO coming onto the market and being acquired by us, we have now provided a high quality home to 6 individuals.

The building is managed by a specialist housing partner Solo Housing, which helps single people in the region through supported accommodation and lodgings to enable them to develop skills to gain independence. The investment came from the HRA and the work was undertaken by our Maintenance team.



# Land and property acquisition

We expect that the opportunities to source and deliver new housing will be via:

1. Using existing sites within the district – where we own land such as garage sites that have potential to be developed.
2. The acquisition of regeneration sites within our district which would include small infill areas and major strategic sites such as Kirkley Waterfront. .
3. The acquisition of Rural Exceptions Sites if economically viable that would help deliver new homes to remote rural areas in East Suffolk.
4. The acquisition of s106 opportunities with developers and housebuilders in partnership with our registered provider partners.
5. The acquisition of existing dwellings that would provide a value for money option and meet an identified need. We will consider any former RTB property that becomes available where the Council has the first option on repurchase.

## Acquiring land

Development provides good value for money if it takes place on Council owned land. As such it is important to also explore the potential of the Council's land holdings to contribute towards improving the supply of new Council housing. However, the Council must consider acquiring land on the open market or by negotiation where practical in order to ensure that homes can be provided where they are needed as our existing land holdings are limited.

Our Housing Strategy and HRA Business Plan recognise the need to develop through the Lake Lothing and Outer Harbour Area in Lowestoft as a means of providing new homes at volume. Housing development is an integral part of the Lowestoft Outer Harbour Area and we recognise the role we must play in building new houses within it. A programme of land acquisition in the area has commenced and will continue. It is projected that a significant proportion of our house building programme will take place here.

## RTB buy back

Previous tenants that bought their former council property through RTB are required to give the Council first option in buying their home. This option will be actively considered as a means of adding social housing back into our stock. These types of dwellings are known to us and can be easily managed and maintained.

## Garage sites

We have several garage blocks in a poor state of repair due to their age and construction type.

We have a programme of identifying these sites for demolition as either additional parking or for potential development. Our recent new builds have taken place primarily on garage sites though inevitably viable sites are now scarce.



# Development considerations

## Viability and affordability

To ensure that we can continue to fund the development of Council housing it is important that each scheme has been properly assessed for viability. There must be an acceptable relationship between the cost of delivering the housing, taking all costs into account, and the rental income we will receive. It is necessary to ensure that the impact of each scheme on the HRA Business Plan is calculated and properly understood. The cumulative effect of the development programme must be affordable in the context of the wider HRA Business Plan.

Government policy for affordable housing sets out that the capital cost of affordable housing should largely be met from the rental income it generates. Capital grants to support new building have reduced and the rent charge, set at an 'affordable rent' level, is expected to generate our income. Every new development will be let at an 'Affordable Rent' to assist with the financial viability of the scheme. The aim will also be to ensure that rents fall within Local Housing Allowance levels and larger dwellings in high value areas remain affordable considering the limitations of the welfare system.

## Viability and risk

Each project will be assessed to ensure it meets the following criteria:

- That it meets the aims of this Development Strategy and the HRA Business Plan.
- That its financial viability is fully assessed and that the basis on which it can proceed is properly understood.
- That it has been adequately risk assessed. Building homes involves significant risks. It will rarely be possible to eliminate risk though it can be assessed and managed. A high level risk assessment will be carried out ensuring that proposals have a strategic fit with this and other related strategies, particularly in respect to viability. Our corporate risk management processes will be used to mitigate the risk.

The criteria for determining viability considers:

- An expectation that an assessment is based on a 25-30 year life of the asset but we will always give consideration to the need for the type of housing and the impact such a development could have on the local community and economy. These factors could extend the assessment period to a time that politically is regarded as appropriate;
- That all costs and expenses applicable to the scheme, internal or external, should be fully accounted for and charged to the scheme.

Schemes will be evaluated on the basis that they can be considered financially viable if all the viability parameters are achieved at an Affordable Rent level. Those projects that meet this test will be recommended to our Cabinet to progress. Each project will be developed in accordance with the Council's rules.

## Our Actions

**14 - To develop a scheme viability assessment process to be applied to all proposed new developments in the district.**

# Resources

## Core housing investment

The core funding to support this Development Strategy will come from the HRA. The funding available is detailed in the HRA Business Plan 2018-48 identifying redevelopment funding of £55.9m over 30 years and new development funding of £227.3m over the same period. Our new homes programme within the HRA is budgeted to deliver 257 new affordable homes by 2022/23. In 2017/18 we built 65 new homes. This will be reviewed each time the Business Plan is updated. If we wish to borrow additional funds over the life of the Business Plan there is scope for greater numbers of new build and redevelopments to our stock throughout the district.



## Other Housing Investment

We have other resources available for affordable housing provision such as planning obligations and capital receipts arising from RTB sales. Current Government policy allows councils to retain 100% of the RTB receipts provided they are reinvested in new homes within a 3-year period. Our approach is to fully utilise this opportunity to bring additional resource to fund new homes. Other resources for affordable housing may be used to support council house building or affordable housing provided through a Registered Provider such as accessing grant from Homes England or receiving S106 funding. This is estimated to make up 25% of our funding (£52m) over 30 years.

## Staffing

As identified earlier in this strategy, investment in staffing is recognised as key in relation to our capacity to deliver on our challenging development targets as well as expanding upon the capabilities within our workforce.

We recognise that we need to make a long-term commitment to development and enabling to ensure our objective of building more homes is achieved.

## Our Actions

**15 - Review of 3-year development pipeline to be considered in relation to budgeted finances within HRA Business Plan and to inform the next business plan review.**

# Partnerships, communications and tenant involvement

## Partnerships

We have strong established links with Registered Providers who make a significant contribution to housing supply in our area. It is important that this continues and we intend to work alongside our partners and envisage a complimentary approach to the delivery of affordable homes.

This Development Strategy adopts a position of ensuring an element of competition between Registered Providers to deliver affordable homes via Section 106 planning obligations to ensure a viable market for developers in our area. We are prepared to compete ourselves with our partners where it appears there is low interest in a development.

Where opportunities arise with other public bodies such as the County Council, Ministry of Defence and Homes England to acquire land or work on joint development opportunities we will investigate these opportunities.

## Communication and Tenant Involvement

It is important that decisions are made in an open, transparent and accountable way. It is also essential that they are made promptly so that progress is maintained. Consultation and involvement is very important but it cannot entirely dictate when, where and how decisions are made.

Many of the projects being considered will be close to existing housing. We are very aware that building more homes will bring changes but if done in a sensitive way and to a high standard there is no reason why this should not be acceptable. All our developments will be the subject to some degree of public consultation prior to finalising any plans and submitting a planning application. Engaging parish and town councils will form a key part of our consultation process.

Where our tenants are directly affected by redevelopment, we will discuss proposals early in the process, outline their housing options and support them in making a choice. The aim will be to enable households to stay within their community if they wish. Households will be given a management priority to move, either permanently or temporarily, to suitable housing in an area of their choice. In many cases they will be offered the opportunity of returning to one of the new properties. In most cases tenants who must move will be entitled to compensation.

Residents of the new homes will have the opportunity to feed back after living in the homes for 12 months. This will enable us to consider any improvements in subsequent projects. Our use of HRA funds is limited to our housing projects, but where there is a need for community improvements such as open space or play equipment, we will give this consideration.

## Our Actions

**16 - Introduce a 12 month follow-up survey on all new developments and redevelopments to identify issues and learning to inform future developments.**



# Design and procurement

## Development process and design

New developments will need to meet high standards of design and create environments that are attractive, useable and durable. We want to leave a lasting and positive legacy from the Council house building programme of distinctive and well thought of homes that are also easily managed and maintained.

All new schemes should comply with East Suffolk Council's Design Policy and East Suffolk Council's material specification.

The challenge of climate change means measures to minimise carbon emissions, promote renewable energy and manage water effectively should be an integral part of design solutions. We seek to improve energy efficiency and meet current modern standards and provide new homes that meet these standards where it is feasible to do so within the constraints of site layout, orientation and financial viability. Refer to the Development Outputs section (page 8).

Through direct control of the development process, the Council will seek to promote Corporate Social Responsibility by including provisions in contracts to add value to the local community such as the promotion of employment opportunities and apprenticeships. This added value will assist the Council in meeting the targets of its East Suffolk Business Plan objectives.



## Procurement and implementation

The Council will ensure that procurement of all development services (consultants and contractors) takes place in accordance with its Contracts and Financial Procedure Rules and legal requirements.

We are mindful of the benefits of working with local companies that have a good track record of delivering similar schemes and can contribute to the local economy by their own approaches to procurement, employment and training.

It is important that companies employed by us, either directly or indirectly (for example through lead consultants), will comply with our published policies.

We will seek to use framework agreements or have otherwise preselected contractors in accordance with our Contracts Procedure Rules. Given the value of the construction element for each development, the building contracts will usually be let by way of formal competitive tender, however there will be exceptions to this specifically with regards to land and build projects and off the shelf purchase agreements with housebuilders.

## Our Actions

**17 - Produce a Procedures Guide to support the strategy**

# Housing Development Strategy Action Plan

Action Ref	Action Description
1	Build the capability within the Housing Development Team to deliver a successful development and enabling programme.
2	Develop and publish a 3-year rolling development programme with an objective of achieving 50+ units p.a.
3	Review corporately all Council land ownership to identify potential housing development sites for new Council housing.
4	Ensure that environmental impacts are taken into account in all initial feasibility assessments on potential development and redevelopment projects.
5	Investigate energy efficient and sustainable approaches to development and consider options to deliver new housing and individual remodelling projects to achieve carbon neutral or passive house standards where practicable and cost effective to do so.
6	Develop a 3 year indicative programme of shared ownership and shared equity housing across the district and publish it annually.
7	Consider all developments with S106 new builds to consider viability.
8	Potential development sites across the district to be reviewed and negotiations to be carried out following necessary approvals.
9	Establish effective working relationships with a range of development partners.
10	Establish the means to monitor and assess existing Council assets and potential acquisition opportunities for redevelopment.
11	Improve the efficiency of the housing stock. Reduce the level of under-occupation, helping to alleviate the housing burden on the Council.
12	Deliver a range of accommodation to help our partners meet their statutory responsibilities and reduce the burden on the public purse. This would include a proactive Right to Buy buy-back where appropriate former council housing comes on the market.
13	Increase the number of units affected or created by the redevelopment programme to 30 per annum by 2021.
14	To develop a scheme viability assessment process to be applied to all proposed new developments in the district.
15	Review of 3-year development pipeline to be considered in relation to budgeted finances within HRA Business Plan and to inform the next business plan review.
16	Introduce a 12 month follow-up survey on all new developments and redevelopments to identify issues and learning to inform future developments.
17	Produce a Procedures Guide to support the strategy

# Glossary

Term	Definition
<b>Affordable Housing</b>	<p>housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</p> <p>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p> <p>b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p>c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p> <p>d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p>
<b>Affordable Homes Programme</b>	Investment Programme to support development of new affordable homes by Government appointed Homes England
<b>Affordable Rent</b>	See Affordable Housing
<b>Commuted Sums</b>	Capital sums from private developers held by LA's for supporting new affordable housing developments in lieu of providing affordable housing on site
<b>Compulsory Purchase Order (CPO)</b>	An order issued by the government or a local authority to acquire land or buildings for public interest purposes. For example, for the construction of a major road or the redevelopment of certain brownfield sites.



Term	Definition
<b>Ministry of Housing, Communities and Local Government (Formerly DCLG)</b>	UK Government department whose responsibilities include local government and housing
<b>Design Statement</b>	A design statement can be made at a pre-planning application stage by a developer, indicating the design principles upon which a proposal is to be based. It may also be submitted in support of a planning application.
<b>Development</b>	Development is defined under the 1990 Town and Country Planning Act as “the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land.” Most forms of development require planning permission (see also “permitted development”).
<b>Disabled Facilities Grant</b>	Disabled Facilities Grant Grants administered by the Council to help meet the costs of adapting a property
<b>Homes England (formerly the Homes and Communities Agency (HCA))</b>	Homes England is the non-departmental public body that funds new affordable housing in England. It was founded on 1 January 2018 to replace the Homes and Communities Agency (HCA).
<b>Housing Association</b>	A non-profit organization that rents houses and flats to people on low incomes or with particular needs.
<b>Housing Revenue Account</b>	A ring fenced account held by local authorities funded by rents to provide landlord services
<b>Housing Revenue Account Self Financing</b>	A system for financing council housing introduced in April 2012 that replaced the Housing Revenue Account subsidy System
<b>Infill development</b>	The development of a relatively small gap between existing buildings with new housing.
<b>Intermediate Housing</b>	Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition in the National Planning Policy Framework such as starter homes, discounted market sale housing and other affordable routes to homeownership (NPPF)
<b>Listed Building Consent</b>	Consent required for the demolition, in whole or in part of a listed building, or for any works of alteration or extension that would affect the character of the building.

Term	Definition
<b>Local Plan</b>	A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.
<b>National Planning Policy Framework</b>	Sets out governments planning policies for England
<b>Neighbourhood Plans</b>	A plan prepared by a parish council or a neighbourhood forum for a particular neighbourhood area (made under the Planning and Compulsory Act 2004)
<b>Right to Buy</b>	A scheme in which qualifying tenants are entitled to purchase their homes at a heavily discounted price
<b>Rural Exception Sites</b>	Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
<b>Section 106 Agreements</b>	Section 106 is part of the Town & Country Planning Act 1990. Agreements under it cover requirements of developers as part of planning permissions. These are agreed in the planning application process, to provide contributions (usually financial) to develop facilities/amenities for the local community (e.g. education, open space affordable housing)
<b>Self Build</b>	Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.
<b>Social Rented</b>	Social rented housing is affordable. Social rents are pegged to local incomes to keep rents affordable. Changes to social rents – whether up or down – are controlled by central government. Social rents are lower than so-called 'affordable' rents which are set at up to 80% of the market rate.
<b>Special Needs Housing</b>	Housing to meet the needs of groups of people who may be disadvantaged, such as the elderly, the disabled, students, young single people, rough sleepers, the homeless, those needing hostel accommodation, key workers, travellers and occupiers of mobile homes and houseboats.
<b>Staircasing</b>	Buying more of the equity in your leasehold/shared ownership property normally can staircase to 100% unless in a exempted area
<b>Supplementary Planning Document (SPD)</b>	Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.





## CABINET

Tuesday 7 January 2020

### ACCEPTANCE OF GRANT FUNDING

#### EXECUTIVE SUMMARY

1. In November 2018 Cabinet approved the award of funding to deliver the Stepping Home pilot for Ipswich & East CCG, working with patients at Ipswich hospital and in the local community, to facilitate their discharge and prevent admission. The pilot looked to solve housing problems that prevented patients going home or put them at risk of admission. The scheme has proved so successful that the Warm Homes service has been asked to develop a similar programme with West Suffolk hospital. (Warm Homes is delivered by East Suffolk Council as a Suffolk-wide service) Due to the urgency of winter pressures, the Head of Housing in consultation with the Cabinet Member for Housing, has provisionally agreed to carry out this work which is fully funded by the award. This report seeks retrospective approval of that decision.
2. A bid has also been prepared to deliver a pilot scheme working with the voluntary sector to pilot a new approach to hoarding and self-neglect. The funding is from the Ministry of Housing, Local Government and Communities (MHCLG). We should know if we have been successful by the end of December and the funds must be spent by the end of March 2020. This report seeks approval to accept the funding.

Is the report Open or Exempt?	Open
<b>Wards Affected:</b>	All
<b>Cabinet Member:</b>	Councillor Richard Kerry Cabinet Member with responsibility for Housing

<b>Supporting Officers:</b>	Samm Beacham Senior Environmental Health Officer 01394 444256 <a href="mailto:Samm.beacham@eastsuffolk.gov.uk">Samm.beacham@eastsuffolk.gov.uk</a>
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## **1 STEPPING HOME FUNDING - INTRODUCTION**

- 1.1 The Ipswich and East Stepping Home initiative, which launched in December 2019, has, to the end of November 2019, delivered assistance to 154 patients saving an estimated 296 bed-days and a nominal financial saving of £182,000 to the system. The service which is supported by 1 full time member of staff, based in the hospital, delivers:
- A better patient experience at discharge from hospital – someone who is there to find and deliver practical solutions to help the resident get home. The pilot includes a stepping home flat where residents are accommodated in a residential setting until home is made safe and suitable. This reduces deconditioning and helps maintain independence.
  - Avoids hospital admissions and readmissions – the home environment is assessed for safety and repairs and solutions delivered against any problem found
  - Reduce fuel poverty and provide warmer homes that are more comfortable and affordable to heat – residents are signposted to surviving winter fuel payments, first time central heating and lent oil filled radiators, if their heating is broken, whilst a fix is arranged.
  - Provide better metrics to understand complex reasons around discharge- Healthwatch have been commissioned to review the pilot and have nearly completed a round of focus groups and user consultations.
- 1.2 Appendix A is a copy of the latest Warm Homes status report which includes further information on Stepping Homes. The project was also filmed for a BBC series with Matt Allwright to be broadcast in the New Year; the case involves a resident who fell and lay on the floor undiscovered for 5 days. He recovered in Ipswich hospital but couldn't go home due to his hoarding of DIY equipment, disrepairs and a lack of heating. The Stepping Home project provided safe accommodation whilst all of these problems were remedied, and he was able to go home to a safe environment and re-engage with his family and friends who could now visit him.

## **2 WEST SUFFOLK STEPPING HOME ROLL OUT**

- 2.1 The success of the pilot in Ipswich and East area has been reviewed by West Suffolk hospital who have identified funding to deliver the same programme in their area. They have offered full funding of £62,000 to mirror the programme and plan for services to run over the next 12 months. A member of staff has been recruited to the role ahead of Cabinet acceptance due to the significant impact of winter pressures which have already commenced. No match funding is required for this scheme.

## **3 PRIVATE RENTED SECTOR ENFORCEMENT AND INNOVATION PROGRAMME.**

- 3.1 MHCLG launched a fund in November aimed at raising the standards in the private rented sector (**PRS**) by supporting local authorities execute their duties and enhance on-going **PRS enforcement**. The fund also included a section allowing for bids which support good landlords through engagement, training and knowledge sharing to support them in providing decent, well-maintained homes for tenants.

- 3.2 There is a growing issue, also highlighted through the Stepping Home project, with residents who display hoarding and self-neglect behaviour. The bid that has been submitted is a multi-agency pilot, linking statutory and voluntary sector organisations, with residents and landlords to address poor housing standards in properties where this behaviour is prevalent.
- 3.3 The proposal aims to work with Lofty Heights Community Interest Company and Access Community Trust to develop best practice around decluttering, with ongoing support for tenants to achieve long term improvements in mental health and reduce the incidence of recurrence. The pilot will also ensure engagement with landlords to deliver improvements in housing standards after decluttering and encourage maintenance of tenancies.
- 3.4 The full bid is attached at Appendix 2. There is no requirement for match funding and the programme will run until the end of March 2020.

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

- 4.1 The grant aligns with the East Suffolk Vision in the Business Plan of improving the quality of life for those living in the District. By improving housing to meet the needs of residents, the three-pronged approach of working with communities to make their housing safer and more suitable is met. Improving homes meets Housing and Community Health critical success factors. It also helps deliver the aims of the Housing and Health Charter.

#### 5 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 5.1 The bid is for £56,950 and the funding has to be spent by the end of the financial year 19/20. The partners to the bid will be funded to provide direct services to residents and will model different support mechanisms. The work that Lofty Heights CIC and Access Community Trust, in this field, deliver is specialist and for this reason and the short duration of the pilot no procurement has been undertaken

##### 5.2 Table of costs

Activity	Unit cost	Number of units required	Total costs	Comment
Client support @ 40 hours each	£800.00	10	£8,000.00	Hourly rate £20 Access Community Trust with café support costs below Total 400 hours.
Tenants Café	£350.00	12	£4,200.00	Tuesday café's in Saxmundham and Lowestoft to support tenants with concerns or vulnerability issues and landlords who want more information
Client support @ 48 hours each	£1,050.00	15	£15,750.00	3 Days per client@480 Lofty Heights - no café support Total 720 person hours.
Ongoing client mental health support additional hours	£1,200.00	6	£7,200.00	Mental health support subsequent to clearance 40 hours per client
Decluttering per property	£400.00	43	£17,200.00	Disposal costs
Introduction to hoarding seminar	£400.00	1	£400.00	Half day for partners -Lofty Heights Refreshments for 30 people @£2 = 60
Sharing the learning	£1,350.00	2	£2,700.00	50 people at two sessions, travel and accommodation for speakers.
	£10.00	50	£500.00	Refreshments @10 per head = £500
Marketing and publicity	£500.00	1	£500.00	
Report production	£500.00	1	£500.00	
			£56,950.00	

#### 6 OTHER KEY ISSUES

- 6.1 An Equality Impact Assessment has been carried out and is listed in Background papers. The work described above will have positive impact on age and disability as the schemes will deliver additional services to individuals with these characteristics.

## 7 OTHER OPTIONS CONSIDERED

- 7.1 The Council could have decided not to extend the Stepping Home service to West Suffolk but having developed a working model it was not a difficult service to replicate.
- 7.2 The Council could also have decided not to apply for funding from MHCLG but, the problem of self- neglect and decluttering is a growing one with limited funding to support solutions. The opportunity to a bid with Voluntary sector as delivery partners makes it possible to develop as scheme that can have some impact in the short time scales required.

## 8 REASON FOR RECOMMENDATION

- 8.1 The acceptance of funding from West Suffolk Hospital will enable the service, developed in Ipswich and East CCG, area to be rolled out to other hospital patients in Suffolk at no direct costs to local authorities.
- 8.2 Funding to support resolution of complex hoarding and self-neglect cases is welcomed at a time of increasing need. The ability to develop a pilot study using voluntary sector means this proposal is deliverable in the short-timescale imposed by the funder.

### RECOMMENDATIONS

1. That the award of £62,000 for the West Suffolk Stepping Home project be accepted retrospectively.
2. That the Private Rented Sector Enforcement and Innovation Award of £56,950 be accepted.

### APPENDICES

<b>Appendix A</b>	Warm Homes update report
<b>Appendix B</b>	Bid for PRS Enforcement and Innovation funding

### 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
12/12/20	Equality Impact Assessment	East Suffolk

# Warm Homes Healthy People

## Status Report 2018/19





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## Background and introduction

The Councils in Suffolk have been working as a consortium since 1994 to deliver cost effective solutions to address fuel poverty, energy efficiency, carbon reduction and health improvement programme. The projects delivered with a range of partners have relied on external funding to deliver practical solutions to thousands of households who have benefitted from loft insulation, cavity and external wall insulation, improved heating and other related support. Initially branded as Suffolk Energy Action Link (SEAL) the programme became Suffolk Warm Homes Healthy People in 2012 when the funding shifted to health priorities.

Warm Homes Healthy People (WHHP) is a Suffolk wide, multi-agency partnership project, including all the Suffolk Councils, Clinical Commissioning Groups (CCGs), Hospitals, Voluntary sector and communities.

The vision is to provide practical support, signposting and referrals to achieve the following:

- Raising awareness of fuel poverty, its prevalence and effects.
- Reduce the number and severity of households in fuel poverty
- Reduce cold home related ill health
- Reduce the number of excess winter deaths
- Reduce home energy consumption & energy bills
- Reduce carbon emissions by making homes more energy efficient

Core funding originates from annual contributions from each local authority and Public Health Suffolk. Other sources of external funding are essential to deliver solutions and have included Central Government, National Energy Action (NEA), Scottish Power, Affordable Warmth Solutions, Smart Energy GB and more recently the local CCGs. The nature of this stop start funding often means the exact offer to residents can change on a yearly basis.

WHHP delivery is managed by East Suffolk Council on behalf of all the Suffolk Councils. Suffolk County Council is a lead partner for the large funds including the Warm Homes Fund. Governance is jointly provided by Suffolk Housing Board and Suffolk Climate Change Partnership with regular reports to the Health and Wellbeing Board.

This report sets out the current situation in Suffolk in respect of the situation our residents are living in and the struggles they face to meet rising energy costs especially in rural areas; the impact this has on their health and wellbeing and then looks at the solutions evolving in a challenging environment to try and address these problems.

Information on historic programmes delivered by the project is available from **[whhp@eastssuffolk.gov.uk](mailto:whhp@eastssuffolk.gov.uk)**.

# The problem - Fuel Poverty nationally & in Suffolk

Across England it is estimated that 2.35 million households are living in fuel poverty<sup>1</sup>. Under the new Government definition of fuel poverty, introduced in 2014, a low income high cost indicator is used. A household is considered to be living in fuel poverty if:

- They have fuel costs that are above national average
- And, were they to spend that amount, they would be left with a residual income below the official poverty line

There are 3 important elements in determining whether a household is fuel poor:

- Household income
- Household energy requirements (the amount needed to spend on fuel to keep warm)
- Fuel prices

An estimated 96% of fuel poor households live in poorly insulated homes,

21 million homes in the UK have Energy Performance Certificates below (EPC) band C.

On average a fuel poor household has to spend an extra £371 per year extra to stay warm (compared to an average household).

## Suffolk perspective

Approx. 43,330 households are estimated to be living in fuel poverty in Suffolk. These figures represent the worst levels of fuel poverty in the East of England (see appendix A).

- Suffolk 12% of the population.
- Norfolk 9.5%,
- Essex 6.8%
- Cambridgeshire 7.5%

Within Suffolk, Mid Suffolk has the highest proportion of households in fuel poverty at 10.2 % and Ipswich has the highest estimated number of households living in fuel poverty at 5,239. For more detailed figures of fuel poverty in Suffolk by district and borough see Appendix A

<sup>1</sup> End Fuel Poverty Coalition, 2017

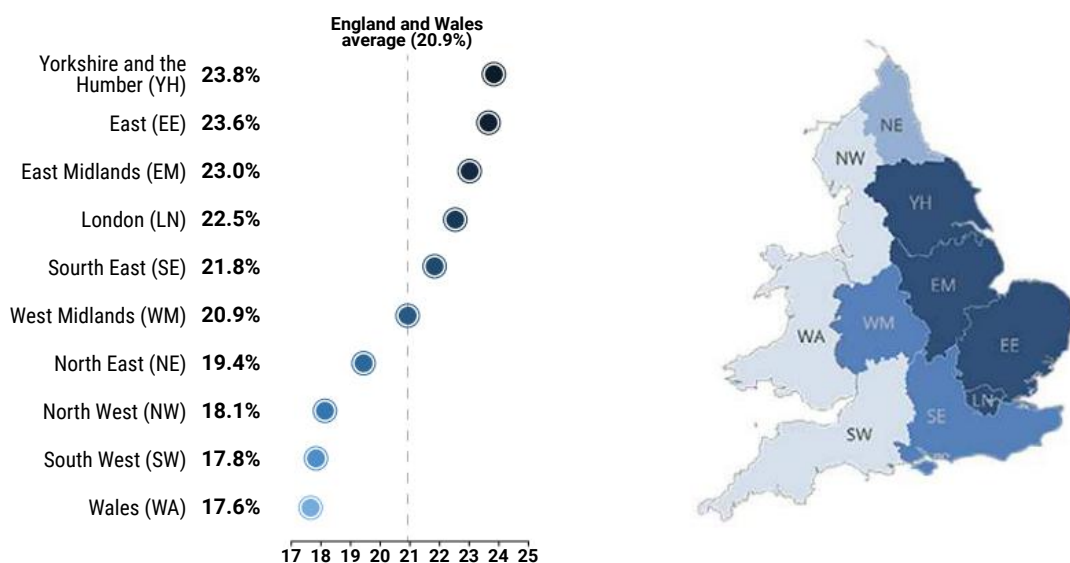
## Health Impact

Fuel poverty can lead to significant ill health and this manifests itself, at the extreme end, in excess winter deaths (EWD); defined as the difference between the number of deaths which occurred in winter (December to March) and number of deaths during the preceding four months (August to November) and the subsequent four months (April to July).

In the 2016 to 2017 winter period, (latest available ONS figures) there were an estimated 34,300 EWD in England and Wales. All of the English regions observed significant increases in the excess winter mortality index between winter periods 2015/16 and 2016/17.

Most excess winter deaths and illnesses are caused by respiratory and cardiovascular problems during moderate outdoor winter temperatures of 4–8°C depending on the region<sup>2</sup>. The World Health Organisation (WHO) estimate at least 30% of excess winter deaths can be directly attributed to cold homes (WHO,2011).

**Figure 1. Excess Winter Death Index for England and Wales 2016/17**



Source: Office for National Statistics licensed under the Open Government Licence v3.0. Contains OS data © Crown copyright 2017  
Graphic created by the GIS and Mapping Unit, ONS Geography

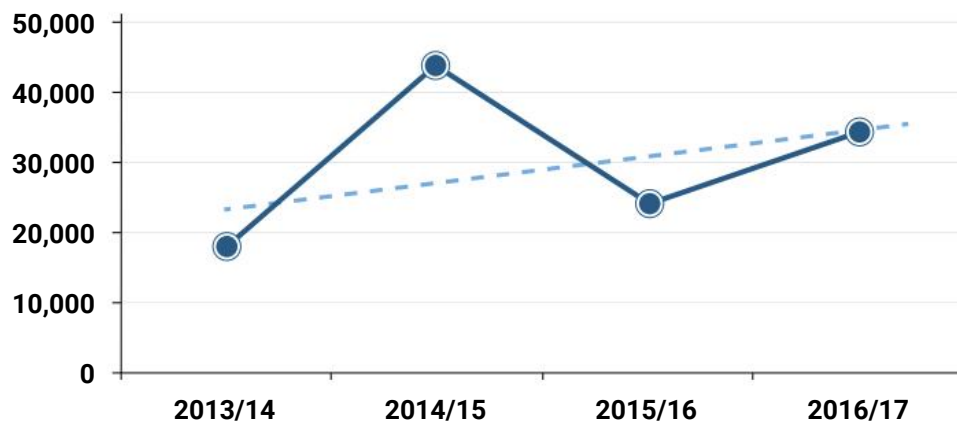
Cold homes are currently a bigger killer across the UK than road traffic accidents, alcohol and drug usage combined. Furthermore, for each excess winter death there are on average 8 hospital admissions.

The elderly have a much higher winter mortality rate with 56% of cold weather related deaths coming from those over the age of 85, a further 27% of cold related deaths were in people aged 75 – 84. <sup>3</sup>

## The Suffolk Picture

In 2016/17, Public Health England recorded there were 557 excess winter deaths; an increase of 243 EWD on previous year. Approximately 167 deaths can be **directly attributed** to living in a cold home. Figure 3 shows the number of excess winter deaths in Suffolk from 2013 to 2017.

**Figure 2. Excess Winter Deaths in England & Wales**



**Figure 3. Excess Winter Deaths in Suffolk**



Additionally National Energy Action (NEA) has estimated that for every excess winter death there is an average of 8 hospital admissions. This means the hospitals that serve Suffolk saw an estimated 4456 avoidable hospital admissions attributed to their patients homes being too cold. This is a 1944 increase from the previous year.

Longer term data from Public Health England shows that between 2013 and 2017 there were 1853 excess winter deaths in Suffolk, so up to 14,000 hospital admissions relating to cold homes. Of these deaths, WHO would consider 555 as being directly attributed to the patients living in homes that were too cold. Further information in Appendix B.

# The Challenges

## Rural issues

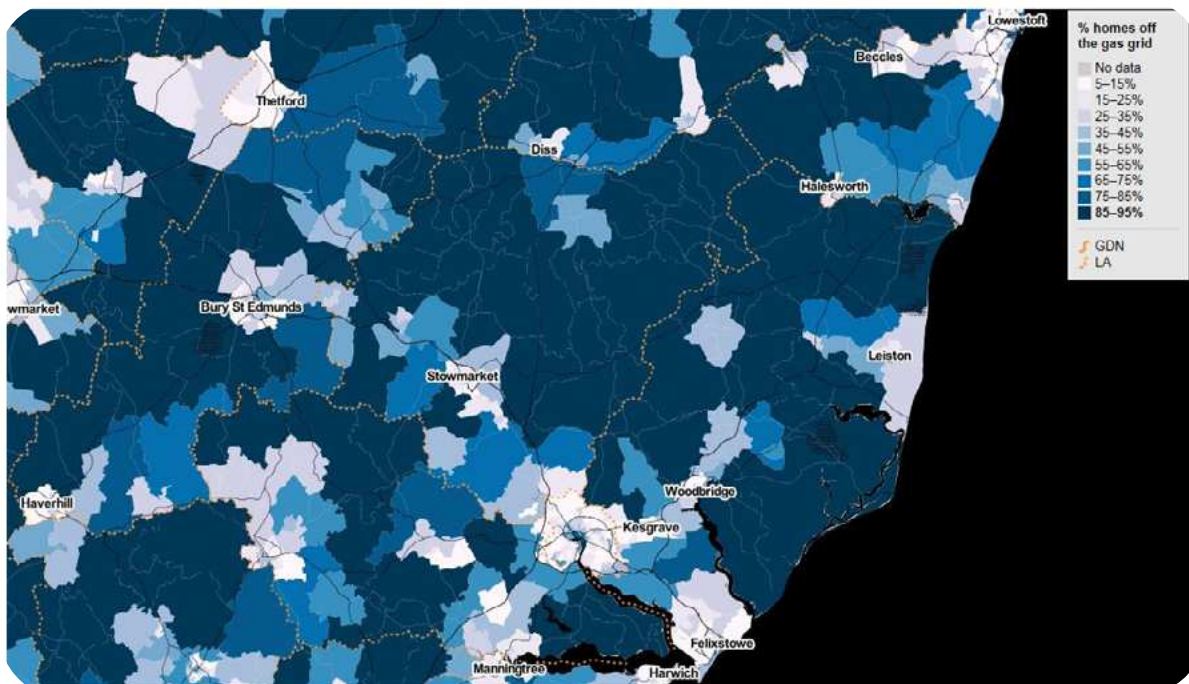
Rural poverty is hidden poverty, as explored in the Suffolk Community Foundation Report “Hidden Needs”. Any project aiming to reach rural residents who could benefit from funding, faces the challenge of finding and engaging with those residents. Often, but not exclusively, they are older residents; digital channels, utilised for so much mass marketing, may not be appropriate; literacy may be an issue; disconnected communities and loss of local shops, bus services and facilities, all add to the challenges.

## Expensive fuel

Suffolk has an estimated 136,129 households off the gas grid, that’s 39% of the total number of homes in Suffolk.

Map 1 below shows the percentage of households off the gas distribution network, in Suffolk. The number and percentage of off gas households in Suffolk is shown by individual district and borough in appendix C.

**Map 1. Percentage of homes in Suffolk off the gas grid.**



National Energy Action's "In From The Cold" report highlights the challenges face by households off the gas grid:

- Off gas households are more likely to be in severe fuel poverty: because they heat their homes with potentially more expensive fuels such as electricity, fuel poor households off the gas grid experience, on average, excess fuel costs of £670 per year, more than double the average fuel poverty gap of the on-gas fuel poor (£302).
- Ofgem (2015c) found households that use electric heating tend to be on a lower income, with around a third in England having incomes of less than £14,500.
- The worst properties are more likely to be located off the gas grid: 70% of F/G rated fuel poor properties (the least energy efficient housing) are off-gas. Over 70% of F/G properties have expensive and hard to treat solid walls and, on average, these homes face excess fuel costs of up to £1,345 per year. This is more than triple the average fuel poverty gap across A to D rated properties.
- Off-gas properties are more likely to be located in rural areas: the extent of off gas properties increases with increased settlement dispersal, with only around 5% of urban areas off-gas (Baker et al., 2008).
- Fuel poverty is more prevalent in rural locations than urban areas and rural households face a number of other pressures, including declining service provision and reduced employment opportunities.

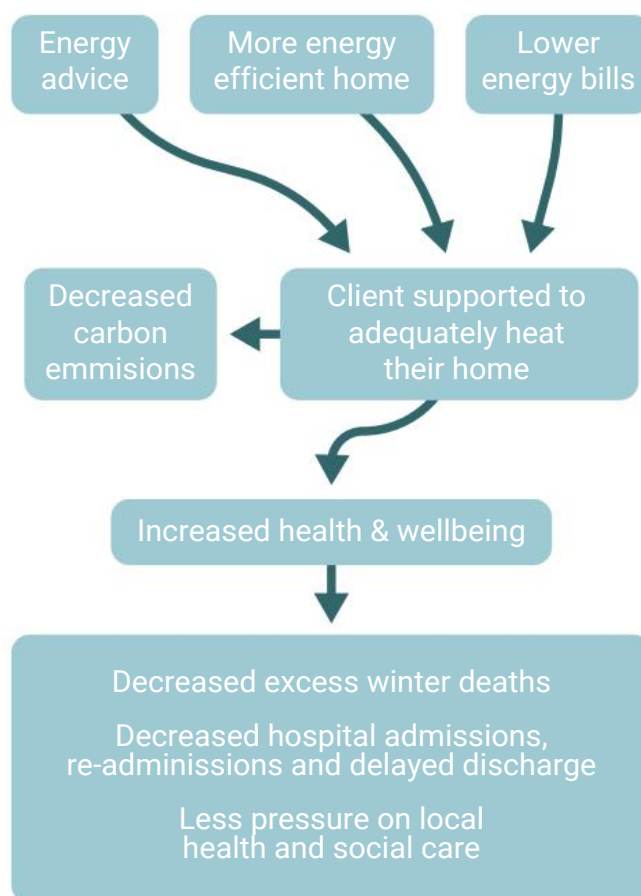
## The Solution

### Goals

Warm Homes Healthy People strives to:

- Reduce ill health due to cold homes.
- Reduce pressure on the health and social care system.
- Make the homes of our clients more energy efficient.
- Reduce energy costs and alleviating fuel poverty.
- Contribute to carbon reduction /climate change targets.
- Ensure our client's homes have suitable heating.
- Provide advice and signposting to a range of related services.

**These outcomes can be visualised as:**





## General Support - Helpline

WHHP has a local helpline and received 2927 phone calls over the year 2018/19, averaging 240 calls per month. Of these over 800 were requests or referrals for help. Referrals came from a wide range of sources.

Appendix D gives the breakdown of the caseload dealt with by the project by referrer, client profile, and outcome.

## Home Energy Surveys

A key core service is the home energy survey which we have established as the best way to form a supporting link with our residents, identify problems they may not be aware of and find solutions and reassure them of the legitimacy of the project through local authority endorsement.

Our 10 surveyors across Suffolk carried out 344 surveys.

Local Authority	Number of Surveys
Babergh District Council	23
Forest Heath District Council	13
Ipswich Borough Council	39
Mid Suffolk District Council	33
St Edmundsbury Borough Council	16
Suffolk Coastal District Council	25
Waveney District Council	195

## Emergency fuel payments

In Suffolk elderly residents who receive a winter fuel payment but don't need it are able to donate it to those that do. Suffolk Community Foundation led the campaign in partnership with Ipswich Citizens Advice, Hopkins Homes, The East Anglian Daily Times, Suffolk County Council, Ipswich Town Football Club, East of England CO-OP, Ipswich Building Society, Rural Coffee Caravan and Warm Homes Healthy People. This winter was the 8th year running, and £125,000 was raised by the project. This resulted in over 636 fuel payments being awarded to those over the age of 63, totalling £66,211.42. Residents who otherwise wouldn't have been able to adequately heat their home.

Warm Homes Healthy People awarded 39 fuel payments to households comprising younger people, totalling £6095.27.



## External Funding

### Summary:

Warm Homes Fund from Affordable Warmth Solutions, enabling the installation of first time gas and oil central heating systems. **£4.3M**

NEAs Warm and Healthy Homes fund to replace boilers for clients with health conditions finished in 2018. Since then individual bids have had to be made client by client to Npower's Health Through Warmth fund, accessed through the Foundations Independent Living Trust. Over **£500k**

NEAs Warm and Safe at Home Fund (WASH) in a project we called Reducing Avoidable Discharge Delays (RADD). This fund enabled us to assist hospital patients with any heating measures leading to quicker discharge or admission prevention. **£10k**

**Details of these funds are provided below and on the next page:**

### Affordable Warmth Solutions – Warm Homes Fund

The Warm Homes Fund (WHF) of £150m fund was established by National Grid using part of the proceeds from the sale of the company's majority stake in its gas distribution business. It will fund the installation of affordable heating solutions in fuel poor households which don't use mains gas as their primary source of heat.

With Suffolk County Council as the lead authority, the consortium of Suffolk Councils was successful in securing £4.3 million, for a project running from 2017 to 2021 designed to install over 500 first time central heating systems.

**Progress: To end of March 2019 94 gas central heating installations have been completed and 14 oil systems.**

This project will enable us to make a practical, long lasting difference to improve residents living conditions and make their homes more affordable to heat.

## National Energy Action's Warm and Healthy Homes Fund (WHHF) 2017/18

### Funding for those with long term health conditions

The Consortium had secured £375,000 of funding under this initiative in 2017 (including a £50,000 match fund from Public Health Suffolk), and was again selected as a delivery partner for a further award of £116,000 in late 2017. With £13,000 of match funding and £5424 of charitable funding an additional 40 replacement boilers were installed for vulnerable households

### Table detailing NEA funding and associated measures delivered in 2017/18

Total NEA Funding	WHHP Match Funding	Charitable Funding	Boilers Installed	Boilers Repaired	L.I	C.W.I	D.P
£116,000	£13,000	£5400	40	2	1	1	6

*L.I – Loft Insulation   C.W.I – Cavity wall insulation   D.P - Draught proofing*

## National Energy Action's Warm and Safe at Home Fund (WASH)

### Reducing Avoidable Discharge Delays (RADD)

The £10k funding can be used to assist hospital patients with:

- Fuel payments, including heating oil.
- Engineer call out fee, to diagnose heating faults
- Small heating system repairs
- Loan heaters



The fund will be ongoing to support any patients in need of intervention.

## Health Focus

Health services are understandably people focussed. Fuel poverty and energy projects are inevitably property focussed. Joining these two linked issues is a nationally recognised challenge.

Suffolk Public Health funds a fulltime Health Liaison manager to build these links. The post holder has achieved considerable success, being awarded honorary contracts in two Suffolk Hospitals.

### Highlights include:

Research project with East Coast Community Health to evaluate the health impact of warm homes interventions. **See appendix E**

One of the favourite quotes

"..it was freezing, it was an absolute icebox in there, since these radiators have been installed, it is hard to say how much of an improvement, oh it's unbelievable"



Work on Cardiac and Respiratory wards, to promote the support WHHP offers as early as possible after admission. By doing this the risk of any delay once the person is medical optimised is greatly reduced.

Weekly winter visits to Ipswich and West Suffolk Hospital Discharge Planning Teams to pick up stranded patients and intervene to deliver heating solutions so they could go home.



Added Key safe installations to offer to support earlier discharge of vulnerable patients. 56 were fitted the same day, or the day after referral.

Distribution of winter warmth packs containing a hat, gloves, scarf, hot water bottle, thermometer and UK Power Networks power cut pack.



Giving out Winter Warmth Packs at Ipswich Hospital 2018



Team Invited to the House of Lords



Warm Homes Healthy People Administrator Lisa Collings wins Heat Hero Award

## Next steps

### Work with Health

Transformation funding has provided the opportunity to expand the role of WHHP within hospitals and the community; launched in Ipswich and East area the Stepping Home pilot is developing new referral routes to address housing related causes of discharge delay.

(NB: In Sept 2019 the project will be extended into West Suffolk)

WHHP role to extend to James Paget Hospital in South Norfolk. Talks are already underway to arrange an honorary contract for WHHP HLM.

### Funding

The Warm Homes Fund runs for the next two years and gives excellent capacity to be able to install first time central heating. However, there is currently a gap in funding for those requiring boiler replacements. Future work will focus on securing some form of boiler funding for those with long term health conditions.

Additional funding opportunities are being explored in partnership with Groundworks.

### Promotion of WHHP

A short film was produced that highlight the work of WHHP and the impact of intervention on householders. Health partners from both Ipswich and West Suffolk Hospital were interviewed around the effect of our partnership on hospital patients and the system as a whole.

[Click here to view.](#)



# Appendices

## Appendix A - Number of households in fuel poverty

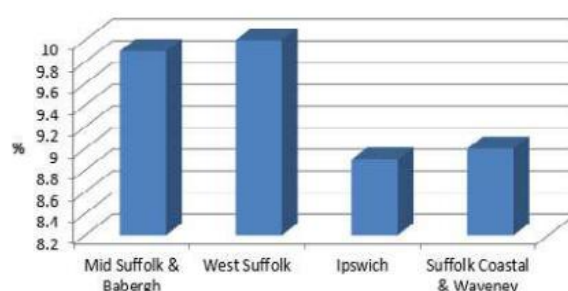
Estimated number of households in fuel poverty by county (data from the Department for Business, Energy & Industrial Strategy (BEIS), 2017)

County	Estimated Number of Households	Estimated number of households in fuel poverty	Proportion in fuel poverty (%)
<i>Suffolk</i>	321,092	43,330	12
<i>Norfolk</i>	384,390	36,389	9.5
<i>Essex</i>	600,922	40,874	6.8
<i>Cambs</i>	259,373	19,544	7.5

Estimated number of households in fuel poverty in Suffolk, broken down into district & borough (BEIS sub regional fuel poverty data, 2017)

District/Borough	Estimated number of households	Estimated number of households in fuel poverty	Proportion
<i>Babergh</i>	38,826	3,737	9.6
<i>Forest Heath</i>	26,191	2,265	8.6
<i>Ipswich</i>	59,136	5,239	8.9
<i>Mid Suffolk</i>	41,582	4,258	10.2
<i>St Edmundsbury</i>	47,324	4,070	8.6
<i>Suffolk Coastal</i>	55,416	4,818	8.7
<i>Waveney</i>	52,617	4,919	9.3

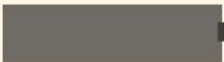












Estimated proportion of households in fuel poverty in Suffolk





## Appendix B - Excess winter deaths index for East of England

**Excess winter deaths index for East of England, 3 years, all ages.  
August 2014 - July 2017**

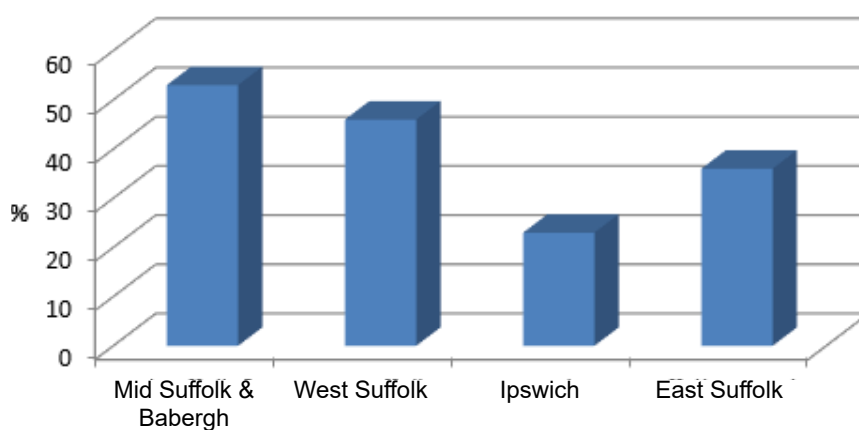
Area	Recent Trend	Count	Value	95% Lower CI	95% Upper CI
England	-	97,016	21.1 	20.7	21.5
East of England region	-	11,498	21.9 	20.7	23.1
Bedford	-	365	27.7 	20.1	35.7
Cambridgeshire	-	973	19.3 	15.6	23.2
Central Bedfordshire	-	343	17.9 	11.9	24.2
Essex	-	3,078	23.3 	20.9	25.7
Hertfordshire	-	2,165	24.4 	21.5	27.4
Luton	-	241	17.3 	10.4	24.7
Norfolk	-	1,746	18.8 	16.0	21.6
Peterborough	-	277	18.7 	11.9	26.0
Southend-on-sea	-	476	27.0 	20.4	33.9
Suffolk	-	1,621	22.7 	19.5	26.1
Thurrock	-	215	18.4 	10.8	26.6

## Appendix C - Households off the gas grid

Table showing percentage of off gas household in Suffolk

District/Borough	Total number of properties	Number of properties off gas	Percentage off gas
<i>Ipswich</i>	<i>62,048</i>	<i>14,333</i>	<i>23.1</i>
<i>East Suffolk</i>	<i>119,351</i>	<i>42,940</i>	<i>36</i>
<i>Mid Suffolk &amp; Babergh</i>	<i>84,167</i>	<i>45,405</i>	<i>53</i>
<i>West Suffolk</i>	<i>79,378</i>	<i>33,457</i>	<i>42</i>

Proportion of households off the gas grid in Suffolk

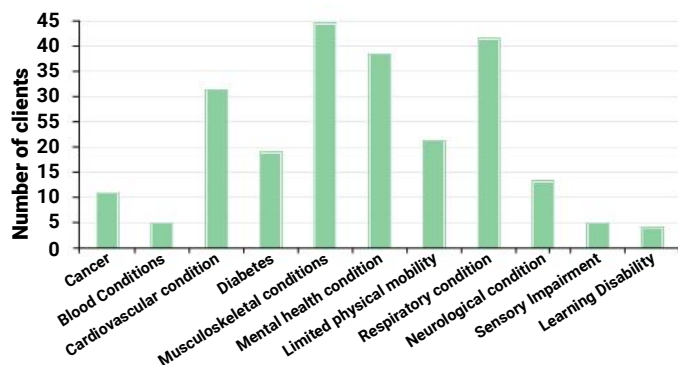




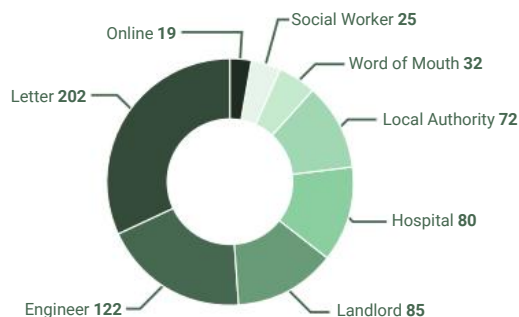
## Appendix D - Warm Homes Healthy People Caseload Breakdown

### Our Clients 2018-19

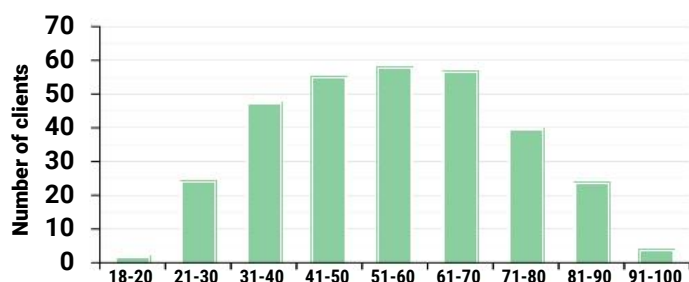
Health Condition



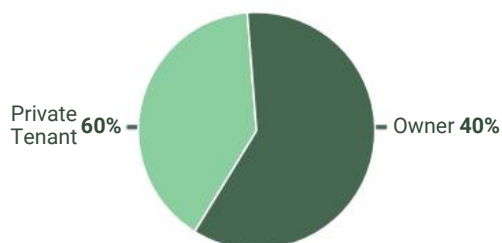
Referral Origin



Client Age



Client Tenure



### Support Given to West Suffolk and Ipswich Hospital Patients 2018/19

	Loan Heaters	Fuel Payments	Boiler Repairs & Replacements	Heating System Installs	Key safes	Other Assistance	Estimated Bed Days Saved	Approx Savings to Trust
<b>Ipswich Hospital</b>	10	1	2	1	56	4	125	£50,000
<b>West Suffolk Hospital</b>	7	7	0	0	N/A	3	84	£33,600
<b>Norfolk and Norwich Hospital</b>	1	0	0	0	0	0	7	£2,800

## Appendix E - Research project information

In 2016 WHHP commissioned a bold and innovative research project was started to help evaluate the impact of WHHP project interventions on the health of householders across Suffolk. In partnership with East Coast Community Healthcare and University Campus Suffolk data collecting started to assess the impact of project interventions on client health and wellbeing.

Participants were asked to complete a health questionnaire (an example can be found in Appendix D) before either a first time central heating system, or boiler replacement was installed, and a year after.

In addition to this ten participants were randomly selected to complete a semi-structured interview, in order to gather more qualitative data on the impact of the heating intervention. The semi-structured interview questions are shown in Appendix E.

The data collected highlighted trends showing that post heating intervention participants had better mobility, more social interaction and felt a slower decline in health (although none of these differences were statistically significant).

The semi-structured interviews were more useful in establishing an idea of the impact of project intervention. Common themes from interviews were the following;

Most participants experienced worry and anxiety that they were unable to heat their homes to stay warm enough and healthy, and reduce any impact on their long term health conditions.

“Not being able to warm your home,..it increases the anxiety, if you know, you cannot make the house warm, so the relief of, the relief reduces the anxiety and lifts mood definitely”

“It was very depressing it was...it was um...in some ways it is horrible to be in..very depressing, this sort of this time of year winter when temperatures used to really drop, it was unbearable. I would stay in the bedroom with an electric heater, hardly come into my living room it was that cold”

Participants were often resorting to extreme measures to stay warm.

“So it was like, lots of hot water bottles and blankets, and layers of clothes and snuggled up close together, you know just me and my children, absolutely freezing. Or going to bed a great deal earlier, just to be warm”

“A huge difference, psychically and mentally...I look forward to coming home now when it is, you know, when it gets cold outside I look forward to coming home and getting warm again, never could do that before”

“...with the storage heaters...they come on at midnight...and they go off at seven in the morning...well the place is...absolutely brilliant...but before 8 o clock...the whole place is freezing cold...we then had to turn to the fire...burning anything from wood to coal”

Participants also highlighted the impact the central heating had on their energy bills,

“...this heating has...saved me big time, compared to what it used to be, because it was a struggle with the storage heaters, they are expensive to run”

“The house is warmer, I feel warmer, I am sleeping better, because I am not cold, I don't wake up cold, and I do not have to wrap myself in socks, gloves, a hat and blanket anymore”



All participants strongly felt the heating had a positive impact on their health and wellbeing.

“..it was freezing, it was an absolute icebox in there, since these radiators have been installed, it is hard to say how much of an improvement, oh it's unbelievable”

“It is a godsend, honestly...and I could not be more happy with it”

In addition, we asked participant's GP surgeries for data related to hospital admissions, A&E attendances and other cases of the participants presenting to the health care system. Results showed no significant difference in the number of times the participants needed to access healthcare. This could be explained in part by the relatively short length of the study, only being a year on average from point of intervention and the small sample size.

The full project evaluation report can be found in Appendix F.

## SF36 Health Questionnaire

### SF36 Health Survey

**INSTRUCTIONS:** This set of questions asks for your views about your health. This information will help keep track of how you feel and how well you are able to do your usual activities. Answer every question by marking the answer as indicated. If you are unsure about how to answer a question please give the best answer you can.

1.	In general, would you say your health is: (Please tick one box.)				
	Excellent	<input type="checkbox"/>			
	Very Good	<input type="checkbox"/>			
	Good	<input type="checkbox"/>			
	Fair	<input type="checkbox"/>			
	Poor	<input type="checkbox"/>			

2.	Compared to one year ago, how would you rate your health in general <u>now</u> ? (Please tick one box.)				
	Much better than one year ago	<input type="checkbox"/>			
	Somewhat better now than one year ago	<input type="checkbox"/>			
	About the same as one year ago	<input type="checkbox"/>			
	Somewhat worse now than one year ago	<input type="checkbox"/>			
	Much worse now than one year ago	<input type="checkbox"/>			

3.	The following questions are about activities you might do during a typical day. Does <u>your health now limit you</u> in these activities? If so, how much? (Please circle one number on each line.)			
	<u>Activities</u>	Yes, Limited A Lot	Yes, Limited A Little	Not Limited At All
3(a)	Vigorous activities, such as running, lifting heavy objects, participating in strenuous sports	1	2	3
3(b)	Moderate activities, such as moving a table, pushing a vacuum cleaner, bowling, or playing golf	1	2	3
3(c)	Lifting or carrying groceries	1	2	3
3(d)	Climbing several flights of stairs	1	2	3
3(e)	Climbing one flight of stairs	1	2	3
3(f)	Bending, kneeling, or stooping	1	2	3
3(g)	Walking more than a mile	1	2	3
3(h)	Walking several blocks	1	2	3
3(i)	Walking one block	1	2	3
3(j)	Bathing or dressing yourself	1	2	3

4.	During the <u>past 4 weeks</u> , have you had any of the following problems with your work or other regular daily activities as a result of <u>your physical health</u> ? (Please circle one number on each line.)			
		Yes	No	
4(a)	Cut down on the amount of time you spent on work or other activities	1	2	
4(b)	Accomplished less than you would like	1	2	
4(c)	Were limited in the kind of work or other activities	1	2	
4(d)	Had difficulty performing the work or other activities (for example, it took extra effort)	1	2	

5.	During the <u>past 4 weeks</u> , have you had any of the following problems with your work or other regular daily activities as a result of <u>any emotional problems</u> (e.g. feeling depressed or anxious)? (Please circle one number on each line.)			
		Yes	No	
5(a)	Cut down on the amount of time you spent on work or other activities	1	2	
5(b)	Accomplished less than you would like	1	2	
5(c)	Didn't do work or other activities as carefully as usual	1	2	



6.	During the <u>past 4 weeks</u> , to what extent has your physical health or emotional problems interfered with your normal social activities with family, friends, neighbours, or groups? (Please tick <b>one</b> box.)	<input type="checkbox"/> Not at all <input type="checkbox"/> Slightly <input type="checkbox"/> Moderately <input type="checkbox"/> Quite a bit <input type="checkbox"/> Extremely <input type="checkbox"/>																																																																														
7.	How much <u>physical</u> pain have you had during the <u>past 4 weeks</u> ? (Please tick <b>one</b> box.)	<input type="checkbox"/> None <input type="checkbox"/> Very mild <input type="checkbox"/> Mild <input type="checkbox"/> Moderate <input type="checkbox"/> Severe <input type="checkbox"/> Very Severe <input type="checkbox"/>																																																																														
8.	During the <u>past 4 weeks</u> , how much did <u>pain</u> interfere with your normal work (including both work outside the home and housework)? (Please tick <b>one</b> box.)	<input type="checkbox"/> Not at all <input type="checkbox"/> A little bit <input type="checkbox"/> Moderately <input type="checkbox"/> Quite a bit <input type="checkbox"/> Extremely <input type="checkbox"/>																																																																														
9.	These questions are about how you feel and how things have been with you <u>during the past 4 weeks</u> . Please give the one answer that is closest to the way you have been feeling for each item. (Please circle one number on each line.)																																																																															
		<table border="1" style="width: 100%; border-collapse: collapse; font-size: small;"> <thead> <tr> <th style="width: 16.6%;">All of the Time</th> <th style="width: 16.6%;">Most of the Time</th> <th style="width: 16.6%;">A Good Bit of the Time</th> <th style="width: 16.6%;">Some of the Time</th> <th style="width: 16.6%;">A Little of the Time</th> <th style="width: 16.6%;">None of the Time</th> </tr> </thead> <tbody> <tr><td>9(a)</td><td>Did you feel full of life?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(b)</td><td>Have you been a very nervous person?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(c)</td><td>Have you felt so down in the dumps that nothing could cheer you up?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(d)</td><td>Have you felt calm and peaceful?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(e)</td><td>Did you have a lot of energy?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(f)</td><td>Have you felt downhearted and blue?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(g)</td><td>Did you feel worn out?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(h)</td><td>Have you been a happy person?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> <tr><td>9(i)</td><td>Did you feel tired?</td><td style="text-align: center;">1</td><td style="text-align: center;">2</td><td style="text-align: center;">3</td><td style="text-align: center;">4</td><td style="text-align: center;">5</td><td style="text-align: center;">6</td></tr> </tbody> </table>	All of the Time	Most of the Time	A Good Bit of the Time	Some of the Time	A Little of the Time	None of the Time	9(a)	Did you feel full of life?	1	2	3	4	5	6	9(b)	Have you been a very nervous person?	1	2	3	4	5	6	9(c)	Have you felt so down in the dumps that nothing could cheer you up?	1	2	3	4	5	6	9(d)	Have you felt calm and peaceful?	1	2	3	4	5	6	9(e)	Did you have a lot of energy?	1	2	3	4	5	6	9(f)	Have you felt downhearted and blue?	1	2	3	4	5	6	9(g)	Did you feel worn out?	1	2	3	4	5	6	9(h)	Have you been a happy person?	1	2	3	4	5	6	9(i)	Did you feel tired?	1	2	3	4	5	6
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11.	How TRUE or FALSE is <u>each</u> of the following statements for you? (Please circle one number on each line.)																																																																															
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Thank You!

## Appendix F - Semi-structured interview used for project evaluation

### Warmer Homes Draft Semi-structured Interview Questions

Format: 1:1 semi-structured interview lasting approximately 30 – 40 minutes

#### This evaluation was designed around:

1. The success criteria identified by Suffolk Councils in their bid for funding for this Intervention. These were to:
  - Reduce fuel poverty and provide warmer homes that are more comfortable and affordable to heat
  - Reduce cold-related morbidity and mortality
  - Improve health and wellbeing
  - Reduce pressure on health and social care services (particularly in winter); and
  - Provide wider social, economic, environmental and other benefits for both households and communities.
2. Results of the initial SF36 questionnaire analysis

#### The stated objectives of this evaluation are;

##### Primary Objective

To measure the effect on the health and wellbeing of the target population living in Suffolk nine months following the introduction of heating and/or insulation

##### Secondary Objective 1

To measure the number of health care professionals visits to this population of patients prior to and post implementation of the heating initiative

##### Secondary Objective 2

To evaluate the at the number of acute hospital admission or readmissions pre Vs post the project

##### Secondary Objective 3

To evaluate the wider social, environmental and economic impact of the intervention

The interview structure and questions are based upon the above objectives, and have been guided by the themes identified from the initial SF36 analysis

## Draft questions:

### Setting background & developing rapport:

- How long have you been living in this house?
- What improvements have been made to your home by the Warmer Homes Team?
- In your opinion, has this been a worthwhile project?
  - ◊ Follow up if indicated: Why do you think that?

### Health impact:

- You have now had the improvements made to your home. Before these were completed, do you think that your health was affected by living in a colder home?
  - ◊ Follow up if indicated:
    - If yes:
      - In what way?
      - Did this affect your ability to do your daily activities (give examples: walking, climbing stairs, bathing)
    - If no: Why was this?
- Some people have told us that they have noticed improvements in their health as a result of having a warmer home. Have the changes to your home made any difference to your health?
  - ◊ Follow up if indicated:
    - If yes:
      - What are the main health differences that you have noticed since having the improvements made to your home?
    - If no:
      - Why is this?
      - Do you feel your health was a problem to you before the changes were made to your home?
- Have you noticed any differences in your own energy or activity levels since having the improvements made to your home?
  - ◊ Follow up if indicated:
    - If yes:
      - What sort of things are you managing to do, or finding it easier to do now these changes have been made to your home?
      - Do you think you have more energy and are accomplishing more because you now have a warmer home, or have other things affected this?
    - If no:
      - Why is this?
      - Do you feel your energy and activity levels were good before the improvements were made to your home?

- Some people have told us that having a warmer home has made them feel brighter in themselves. Have you noticed any difference in your mood since these improvements have been made to your home?
  - ◊ Follow up if indicated:
    - If yes:
      - How has your mood changed since these improvements have been made to your home?
      - Do you feel the changes to your home have been responsible for these changes? Why is this?
    - If no:
      - Why is this?
      - Do you feel that low mood was an issue for you before the changes were made to your home?
- Do you expect your health to change over the next few years?
  - If yes:
    - Do you expect the change to be for the better or for the worse?
    - Will the changes that have been made to your home affect this?
    - In what way?

#### Use of Health Resources:

- Some other projects have found that when people live in a warmer home, then they don't need to see a Doctor or Nurse quite so often. Have you noticed any difference in your need to access the Health Service since these improvements have been made to your home?
  - ◊ Follow up if indicated:
    - If yes:
      - In what way has your use of Health Services changed since these improvements have been made to your home?
      - Do you feel the changes to your home have been responsible for these changes?
      - Why is this?
    - If no: Why is this?

#### Economic impact:

- As well as making your home warmer, modern heating & insulation can sometimes save on heating bills too. Do you think the improvements to your home are saving you money?
  - ◊ Follow up if indicated:
    - If yes: What difference are these savings making to you?
    - If no: Why is this?

#### Other:

- Is there anything else you would like to tell me about your experiences of this project?



# Suffolk's **Warm Homes Healthy People**



# Proposal Form

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Please refer to the prospectus for the criteria to consider when completing this form. Contact the email address below if you have any questions.

**Completed application forms to be submitted by 1 December to:**

[RLEgrantfund@communities.gov.uk](mailto:RLEgrantfund@communities.gov.uk)

Completed applications should include this form, the checklist at the end and a full breakdown of costs.

You may annex essential supporting material where relevant, but key information must be drawn out in your answers below.

Depending on the scale and complexity of the proposal we may seek additional information. Information in this bid may be shared with other government colleagues to inform decisions, help develop our understanding and inform wider policy development and best practice.

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## A. Your details

<b>Project title and brief summary</b> (30 words max)	<p><b><i>Clearer Futures- Tackling hoarding and self-neglect in the rented sector.</i></b></p> <p><b><i>A pilot study supporting landlords and tenants to maintain tenancies; developing good practice with the voluntary, care and health sectors and sharing results through bespoke, practical workshops.</i></b></p>
<b>Local Authority</b>	<b>East Suffolk Council</b>
<b>Contact details of working lead</b>	<p><b>Name: Teresa Howarth</b>  <b>Email: Teresa.howarth@eastsuffolk.gov.uk</b>  <b>Phone: 01394 444206 / 07990848926</b></p> <p><b>POSTCODE: IP12 1RT</b></p>
<b>Partners (if applicable)</b>	<p><b>Access Community Trust</b>  <b>Eastern Landlords Association</b>  <b>Flagship Housing Association</b>  <b>Great Yarmouth &amp; Waveney Clinical Commissioning Group</b>  <b>Ipswich &amp; East Clinical Commissioning Group</b>  <b>Hoarding Disorders UK</b>  <b>Lofty Heights CIC</b>  <b>Suffolk County Council</b>  <b>Suffolk Fire and Rescue</b></p>
<b>Geographical Area covered by the proposal</b>	<b>East Suffolk Council area</b>
<b>Please provide a fuller summary of your proposal that can be used as the basis for press releases</b> (100 words max)	<p>A multi-agency pilot, linking statutory and voluntary sector organisations, with residents and landlords to address poor housing standards in properties where the tenant exhibits hoarding and self-neglect behaviour. Aiming to develop best practice around decluttering, with ongoing support for tenants to achieve long term improvements in mental health and reduce the incidence of recurrence. Working with landlords to deliver improvements in housing standards and encourage maintenance of tenancies. Also delivering environmental benefits to communities through area improvements.</p>

## B. Finance summary

Where further explanation is required on any of the costs this should be included in your description of the proposal in **section 2** below.

**Please provide headline figures in the table below and provide a FULL BREAKDOWN OF COSTS as an annex to your application.**

Financial year 2019-20	TOTAL £56950
Amount requested	
Client support costs	£52350
Workshops/seminars	£3600
Promotional costs	£1000

### **Please note –**

Costs cannot include overheads that are calculated as a flat rate percentage. Actual overheads can be included provided they are clearly evidenced/justified and are proportionate to the size, scale and duration of the proposal.

Costs cannot include management costs/fees that are calculated as a percentage of existing senior management time. Costs can be included for additional project support and management provided these are proportionate to the size of the bid.

Projects cannot be funded where spend would be incurred beyond the end of financial year 2019/20 and cannot be granted where projects include funding in advance of need. Due to this, we will not fund permanent staffing costs. However, the grant can be used to fund temporary staff on a time-limited basis within the funding period.

# **1. What is the issue you want to address, and current action being taken? (500 words)**

East Suffolk is a new Council formed from the merger of Suffolk Coastal and Waveney District Councils in April 2019. The area has a housing stock made up of 14.2% PRS (approximately 14,900 properties) and 13.2% social rented (approximately 13,200 properties). The area is diverse, with affluent areas, pockets of significant deprivation and isolated but common rural poverty.

The issue we want to address is the complex situation of self-neglect and hoarding. Our experience is that households living in these circumstances have complex mental health needs. The homes they occupy are frequently in disrepair; impossible to heat effectively; present a fire and electrical safety risk; may also be filthy and unhygienic, all of which impacts the mental health and general well-being. It is estimated that 2-5% of the population has a hoarding disorder but there are no figures directly linked to tenure. Extrapolating the figures above, we estimate the problem could affect 1000 households who rent in our area.

Landlords who accommodate tenants who hoard, are faced with a difficult dilemma, some will serve notices seeking possession and then be left with a vacant property with bills running into the thousands of pounds to clear. Others will request help from the Council who, have the enforcement options under the Public Health or Environmental Protection Acts, or action under Housing Act 2004 if category 1 hazards exist. The first option invariably leaves the Council with the bill for clearance as the occupants frequently cannot afford to fund the costs and this action does nothing to support the underlying reasons for the hoarding behaviour, leading to recurrence. The second option requires the landlord to act to improve housing standards in a property that they cannot access and does nothing to resolve the tenant's behaviour. It is also likely to lead to landlords to resort to forcing an eviction and the problem moving elsewhere. Other landlords will exploit the situation; taking the rent with no regard for the tenant's health or safety.

Social services can provide support to help with long term behaviour changes, however existing teams are stretched and have no budget to support physical clearance.

In the current housing crisis, we want to support landlords to continue with tenancies where hoarding is an issue. Establishing effective partnerships and tackling problems before they become acute is believed to provide the best solution.

East Suffolk is currently working in partnership with Ipswich Hospital on a hospital discharge scheme. A significant number of clients have been helped from within the acute environment of the hospital to address hoarding via this pilot. The purpose of this bid is to use this learning and apply it at community level to support residents and landlords by early, multi-agency, intervention.

## **2. How are you proposing to tackle the problem, and why is this your preferred approach? (1250 words)**

The proposal hinges around identifying tenants who exhibit self-neglect or hoarding, measured on the clutter scale at 4 or above. These individuals will be identified through a wide range of partner organisations including the emergency services, health and social services, charitable and community groups and landlords. The Eastern Landlords Association have offered their support to disseminate information to their members about the project to build understanding and encourage referrals.

The offer is centred upon holistic support of the tenant to tackle the whole issue providing both practical and emotional support through the decluttering process; resolving underlying poor housing standards; supporting the individual after the property issues are resolved, encouraging a change in lifestyle with improvements in wellbeing and health. We are already aware of individuals in the PRS who's tenancies are at risk because of the condition of the properties. Solutions are stymied by the lack of funding to tackle the clearance and the acute pressures on social services to support the tenants during and after decluttering.

The proposal is costed on the basis of 40-48 person hours of voluntary sector support (and will not involve permanent posts) for each client, plus up to £400 per property for clearance. This innovative element of time for volunteers to work with the client to clear is seen as key to success. Support will be provided by various partners working in different areas of East Suffolk. [Lofty Heights](#), a CIC with an established decluttering and self-neglect programme, will work with PRS tenants in the south of our area providing decluttering and support services to 15 residents. For 5 of the most vulnerable they will also offer an additional 40 hours of post work support.

[Access Community Trust](#) who already support vulnerable residents in a variety of different circumstances, will do the same in the north of the area for up to 10 residents and also operate fortnightly 'Tenant Tuesday Café's modelled on their existing wellbeing cafés. These will provide a safe space for tenants to come and seek support. Alternate cafés will extend to offer training space for landlords who want to learn more about how they can support vulnerable tenants, like care leavers. These would be in Lowestoft and Samuda. We will also work with Flagship Housing who will work to support up to 18 of their own tenants facing hoarding challenges and the fund will help pay for clearance.

In cases where the clearance is at a level of clutter scale 7 and above the sums above could be supplemented by a Council grant under the Regulatory Reform Order adopted by the Council which is for works costing between £1000 and £5000.

Once the work has been completed and the properties are clear they will be inspected by East Suffolk Council's Private Sector Housing team to identify any significant hazards and take action to ensure good standards. In most cases

works should be done by agreement and the Council's Renovation Grant will be made available. The grant policy provides funding in return for an agreement that the landlord will let the property at an affordable rent for 15 years or the monies are repayable. Where agreement cannot be reached, robust enforcement action will follow. As part of the assessment, the energy performance of the building will be reviewed and clients will be matched to available grants for heating or insulation. Suffolk currently has funding from the National Grid Affordable Warmth, Warm Homes Fund so has funding for fuel poor households, including many of the likely tenants identified under this programme, for first time central heating. We will use the minimum energy efficiency standards as an alternative enforcement tool which could bring in fines.

East Suffolk has been working with Ipswich and East CCG over the last 12 months and has developed the [Stepping Home](#) scheme to help patients who are medically fit but unable to be discharged from hospital due to housing issues. The project funds solutions and, as part of the programme, has supported individuals with hoarding disorders. The learning from this scheme will be used to help ensure we have the right people engaged at the right time to support the immediate issues and deliver ongoing support for clients to avoid a recurrence of hoarding.

The service supports the objectives of Suffolk Fire and Rescue service by dealing with high risk properties where means of escape is compromised, and high fire loads increase the risk of fire deaths. Fire Officers will also visit tenants, where appropriate, to give advice on fire safety. All properties should already have been provided with smoke, and in some cases carbon monoxide, detectors by the landlords, but these will be checked to ensure they are working correctly and providing early warning.

The Police are also some of the first professionals to identify potentially hoarded properties, therefore as well as another source of referrals, the pilot may see a reduction in anti- social behaviour, vandalism and other criminally related issues, although these may be difficult to quantify.

Tackling hoarding in the community with this early intervention approach, will help to reduce the tenant's call on health services; both mental health and physical health. There is an increased risk of falls, illness linked to poor hygiene and cold homes and health issues linked to social isolation and lack of exercise. We will work with integrated neighbourhood teams, GP practices and other primary and secondary healthcare providers to identify tenants needing support. It is recognised that outcomes from health services not taken up will be difficult to measure.

By helping tenants retain their tenancies there will be reduction in the need for the Council to support under the duties of the Homelessness Reduction Act, benefitting an already stretched service. There may also be some opportunities for rough sleeper support via mental health signposting (see later).

This approach is our preferred way of attempting to tackle a complex and resource intense issue, in the short term offered by this funding. Hoarding is

made even more complex issue when landlords are involved. By involving a multiplicity of statutory and non-statutory agencies and modelling variations in approach to fit in with the needs of the tenant and the supporting agencies, we can learn and deliver more outcomes in a short period of time.

No significant risks are identified with roll-out as partners are already playing a part in this area, just not in the intensive and cohesive way suggested in this bid. Work could commence with known individuals in early January.

The project will deliver two workshops run by the national organisation [Hoarding Disorders UK](#) ; disseminating information and case studies, sharing experiences and best practice to support sustainable long-term solutions. These will be open to local service providers and other local authorities. We will also publish on the web a summary report to share learning

Access Community Trust have indicated that if the café approach is successful the income from sales will enable them to sustain these beyond the end of the project.

This option is believed to provide the best chance of success and, as this is a pilot, learning will come from it, so no other options have been considered. The project is believed to be scalable beyond the end of the funding subject to outcomes and opportunities for pooled budgets.

The pilot will identify costs and benefits, giving the partner agencies the opportunity to reflect on future funding. Are the savings to the system sufficiently robust to warrant investment in this model, moving forward?



### **3. How will the proposal benefit the local community? (750 words)**

East Suffolk has recently launched 8 Local Community Partnerships to engage those who live and work in East Suffolk communities in deciding priorities for each area based on published data and local insight. We will use these partnerships as a two-way information exchange to provide details of the project, receive feedback on cases and outcomes from the communities and endeavour to support any local needs identified, in addition to the already identified priorities. The partnerships are supported by dedicated community leads employed by East Suffolk Council and they will be key in feeding back grass roots views.

The support cafes will be open to all residents and will bring a new facility to the community strengthening community ties around health and wellbeing and, if successful, will continue after this project as an ongoing asset.

Hoarding cases already result in service requests to the Private Sector Housing team, particularly where the hoarding is visible from outside the property or extends to the garden. Over the last three years the team had received 555 service requests involving refuse, vermin and filthy premises and in 85 of them, hoarding was a factor. East Suffolk already use powers under the Prevention of Damage by Pests Act 1949 and the Environmental Protection Act 1990 to deal with accumulations of rubbish, but in hoarding cases the problems recur frequently due to the underlying mental health disorder, to everybody's frustration. Hoarded properties are a magnet for fly-tipping a big community concern, and Planning Enforcement complaints are also linked to hoarded properties as they impact on the amenity of the neighbourhood". The multi-agency approach and earlier intervention should reduce or prevent complaints. The additional work to address housing standards should also improve the quality of properties with a positive knock on effect on the neighbourhood. It is difficult to quantify the impact of this short-term project.

There will be community benefits from increased awareness of the issue and the agencies who are there to support. Reduced risk of fire and vandalism will also be tangible outcomes.

Rough sleeping is a community concern and many rough sleepers find it impossible to get back into rented accommodations due to landlord's perceived risks of arson, hoarding, and neglect. There would be opportunities for the rough sleepers to be supported through the tenant's cafes. East Suffolk is also bidding for Housing Needs funds to set up a mitigation fund to support rough sleepers back into accommodation. The mitigation fund of £2000 per case could potentially also support clients identified through this programme, to give confidence to landlords to maintain tenancies and avoid residents losing their homes and adding to rough sleeper numbers.

#### **4. Outputs, outcomes, and evaluation (750 words)**

Please provide a breakdown of targets and expected outputs below and when they are expected to deliver. These must be clearly linked to the issues identified in section 1.

Please note funded proposals will be expected to keep provide regular progress reports to an agreed programme and will be asked to complete an 'Impact Summary' after the project.

##### **Bid Announcement**

**Bid partners and other agencies likely to be interested, advised of bid award subject to cabinet member approval, and invited to inaugural training and information event.**

##### **Rollout**

##### **W/C 5 Jan**

**Cabinet acceptance of Bid.**

**Inaugural meeting and initial training session.**

##### **W/C 13 Jan**

**Scheme launch.**

**Flagship commence casework.**

**PRS Tenants already known to partners identified and initial interventions made.**

**Contact made with professionals and cascade of project information.**

##### **W/C 20 Jan**

**Tenant café launched.**

**New tenants identified.**

**First Flagship clearance cases commenced.**

**Initial work commences with PRS tenants.**

##### **W/C 27 Jan**

**Refresh contacts with social services, police and fire service at local level.**

**Cascade training to mental health support teams.**

**Deliver training to GP practices.**

##### **W/C 3 Feb**

**Review meeting.**

**Dissemination of information – ongoing.**

**New and existing client support ongoing.**

**Review of any completed cases.**

##### **W/C 10 Feb to W/C 9 March**

**Project continues to roll out.**

**Review of completed cases and learning fed into project improvements.**

##### **W/C 16 March**

**Workshop 1 & 2.**

**Project activities continue.**

##### **W/C 24 March**

**Project activities continue.**

##### **W/C 6 April**

**Project review meeting with all delivery partners.**

##### **W/C 25 May**

**Publication of outcomes report and findings presented to key stakeholders to evaluate opportunities for continuing service.**

**All the targets below will be met by the end of March 2020**

**15 tenants supported to declutter by Lofty Heights CIC.**

**10 tenants supported to declutter by Access Community Trust.**

**18 tenants supported to declutter by Flagship Housing Association.**

**30 – 50 tenants supported through attending tenant's cafes.**

**43 Tenants supported to maintain tenancies.**

**25 PRS properties inspected and action taken to ensure they provide good standard of accommodation post clearance.**

**30 landlords and letting agents trained to recognise the early signs of hoarding behaviour and made aware of how to access support.**

**20 other agencies including other local authority staff trained to recognise the early signs of hoarding behaviour and made aware of how to access support.**

**10 agencies engaged in finding solutions for vulnerable residents leading to better partnership working.**

**Other outcomes**

**5 evictions prevented.**

**5 units of temporary accommodation not utilised for these residents.**

**3 Hospital admissions avoided (cost in the region of £400 per day).**

**This checklist will help you ensure your proposal meets the Fund's criteria. You should indicate all that apply and submit this with your application form.**

**Your proposal should:**

Demonstrate how your project will meet the following criteria:	
<ul style="list-style-type: none"> <li>Achieve positive enforcement outcomes and have clear supporting evidence.</li> <li>Have measurable outcomes and planned evaluation</li> <li>Demonstrate that the project is cost effective, clearly deliverable and financially sustainable.</li> </ul>	Y Y Y
And (where relevant):	
<ul style="list-style-type: none"> <li>Are innovative in the way they tackle enforcement challenges.</li> <li>Enable the local authority to self-finance future enforcement activity.</li> <li>Encourage positive landlord/tenant/local authority relationships</li> <li>Contain a mechanism for the local authority to share their experiences and learning.</li> </ul>	Y Y
Detail existing issues and challenges faced in taking successful enforcement action.	Y
Demonstrate benefits to the wider local community.	Y
Have a clear success measures and narrative.	Y
Seek reasonable funding, which is proportionate to the scale of the issue and overall size of the Fund.	Y
Be based on local evidence.	Y
Make use of scalable approaches, and demonstrate how these could be taken forward in wider-reaching pilot schemes in the future	Y

**Your proposal must not:**

Duplicate mainstream funding, or funding received through other sources.	N
Fund any local authority provision or services that are already being provided.	N
Fund in advance of costs incurred, for instance through funding permanent staffing costs	N
Include overheads that are calculated as a flat rate percentage. Actual overheads can be included provided they are clearly evidenced/justified and are proportionate to the size, scale and duration of the proposal.	N
Include management costs/fees that are calculated as a percentage of existing senior management time. Proposals can include costs for additional project support manager that are proportionate to the size, scale and duration of the proposal.	N
Fund Police or Fire and Rescue Service staff time	N
Fund the start-up costs for selective licensing schemes, as these should be self-funding. Consideration will be given to housing projects within a selective licensing area provided the additional benefits are clear.	N

If you are still unclear about the criteria checklist please contact:

[RLEgrantfund@communities.gov.uk](mailto:RLEgrantfund@communities.gov.uk)



## CABINET

Tuesday 7 January 2020

### PARKING SERVICES: PARKING MANAGEMENT AND CIVIL PARKING ENFORCEMENT

#### EXECUTIVE SUMMARY

1. The Civil Parking Enforcement project has been ongoing since December 2016 and this report updates Cabinet on the progress.
2. The importance of parking demand management in the context of revitalising town centres and CPE administration is discussed.
3. Proposals for a simplified tariff structure that supports the evidence-based parking demand management approach.
4. The primary benefits of the recommended approach for parking services provision and delivery for visitors, businesses and East Suffolk Council are discussed.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All
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<b>Cabinet Member:</b>	Councillor Norman Brooks Cabinet Member with responsibility for Transport
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<b>Supporting Officer:</b>	Lewis Boudville Parking Manager 01394 444223 <a href="mailto:lewis.boudville@eastsoffolk.gov.uk">lewis.boudville@eastsoffolk.gov.uk</a>
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## **1 INTRODUCTION**

- 1.1 In December 2016, Suffolk Coastal District Council and Waveney District Council resolved to adopt Civil Parking Enforcement (CPE) powers (provided by the Traffic Management Act 2004) as and when they are delegated from Suffolk County Council (SCC). Since that time, Suffolk Police and SCC have been liaising with districts across the county about the delegation of CPE powers and the set-up of Parking Services administering CPE.
- 1.2 CPE requires the effective administration of 'parking services' enabling the enforcement of on-street regulations such as 'no stopping', 'no waiting', 'no loading' and kerb-space 'parking' management regulations, which are introduced for 'traffic movement', 'road user safety' and 'balancing parking demand' reasons. CPE powers also extend to the enforcement of ESC's off-street parking places (car parks).
- 1.3 The advantages of ESC administering CPE, from the residents' perspective, include: the ability to address parking related issues caused by inconsiderate parking practices such as 'wheels-up' on footways, obstruction of informal pedestrian crossings, non-residents parking in streets which reduces parking opportunities for residents; and enforcement of regulations introduced for road safety reasons such as 'corner protections' (yellow lines) which preserve visibility and prevent obstruction at junctions.
- 1.4 The challenges for ESC administering CPE include: ensuring the legal documents are in place that provide powers and facilitate effective and efficient service delivery; setting-up a Parking Services operation that optimises service delivery from a business management and customer interface perspective; and ensuring the Parking Services resource is a cost neutral service for ESC in accordance with the relevant Statutory Guidance.
- 1.5 The kerb-space management regulations (para. 1.2) are introduced from the Road Traffic Regulation Act 1984 (RTTA) in order to keep the highway free from obstruction and/or facilitate access to trip attractors, or safely manage the demand for on-street parking on the highway network. The same Act provides regulations for managing car parks.
- 1.6 Parking demand management supports access to 'trip attractors' such as places of education, healthcare, historic interest and leisure including shops; and the delegated CPE powers provided by new legislation for Suffolk requires ESC to develop a new Parking Service delivering parking services beyond simple enforcement. The most important part of the new service is to provide a consistent approach to parking demand management ensuring both on-street and off-street parking places provide parking opportunities for all who choose to access trip attractors by car. This is necessary to ensure CPE is then administered in a fair and reasonable manner because the objective is for drivers to easily understand the rules of parking management and comply, so ESC does not need to serve Penalty Charge Notices (PCNs) (parking fines) in order to encourage compliance.

## **2 SUFFOLK COUNTY COUNCIL – LEGAL PROCESSES, AGENCY AGREEMENT AND DELEGATION OF POWERS**

- 2.1 A Statutory Instrument (SI) must be approved by Parliament in order to provide CPE powers to SCC. Following numerous delays (due to Brexit), the Department for Transport (DfT) confirms the SI will be laid before Parliament from 9<sup>th</sup> January 2020 with a commencement date of 31<sup>st</sup> January 2020.
- 2.2 SCC and ESC officers have developed an Agency Agreement which confirms the 'Functions' to be delegated to ESC enabling CPE administration. It will be supported by other documentation including a Parking Management Plan and a Service Level Agreement that will detail the expected levels of performance to be achieved by both

parties. A report regarding the Agency Agreement will be presented to Full Council at its meeting 26<sup>th</sup> February 2020.

- 2.3 A Traffic Regulation Order (TRO) is the legal document necessary for delivering effective CPE. A TRO details the regulations from the RTRA installed for highway management reasons and includes the rules applicable for regulations balancing parking demand providing the legal basis upon which payment parking and permit schemes can be administered.
- 2.4 An Off-street Parking Places Order (Off-street Order) is the equivalent legal document for managing parking demand by regulation in ESC's car parks and this report details proposals for the same. With reference to paragraph 1.6, the proposed approach to parking demand management must be agreed enabling the development of this legislative compliant Off-street Order in readiness for CPE administration.

### **3 EAST SUFFOLK COUNCIL**

#### **Parking demand management and tariffs**

- 3.1 The Off-street Order details the way in which ESC administers permits, exemptions, Season Tickets and cashless payment services in its car parks. There are more than fifty different tariffs in East Suffolk (CAB 41/18) and more than one hundred permits, exemptions and special arrangements and there is much inequality for all users including residents, visitors and organisations. The many different types of payment levels influence how drivers choose to park. For example, drivers may 'patrol' a town looking for the cheapest space, negatively impacting the quality of public realm and highway efficiency by increasing traffic flows and noise pollution and reducing air quality; all impacting the quality of place.
- 3.2 The off-street parking places tariffs have been reviewed, rationalised, standardised and reset in the context of place and parking management. ESC's Economic Development team's 'People & Places: Revitalising East Suffolk Towns' project provides evidence-based place management enabling accessibility and connectivity to be determined and inform how parking management can be used as part of a package of measures to positively influence the economic success of each town.
- 3.3 Cabinet approved the development of a parking tariff structure that will support access to 'trip attractors' in a managed way in the context of CPE administration and the delivery of parking provision as a service (CAB 39/18). Rationalising and consolidating more than fifty different tariffs mean some drivers will pay less for their parking and some more. On average 59.0% of the proposed tariff levels are less or the same as in 2019/20.
- 3.4 Cabinet resolved to simplify and align the Suffolk Coastal and Waveney districts' car park tariffs to enable the creation of a single East Suffolk tariff structure (CAB 41/18 and CAB 04/19). The delivery of this resolution is aligned with the commencement of CPE administration in order to achieve best value in service delivery.
- 3.5 The existing tariffs are overcomplicated because 'dwell times' (the length of stay for a particular trip purpose) are typically categorised as one of three and the 'People &

Places' surveys confirm the same to be true. Therefore, tariffs should be simplified accordingly:

- Quick (/convenience) trips are less than thirty minutes (7.2% of the Council's registered parking events)
- Leisure (/shopping) trips are up to four hours depending upon the trip attractors (75.2% of the Council's registered parking events up to two hours and 93.1% up to four hours)
- Commuter trips and days out (and local resident demand) are more than four hours (6.9% of the Council's registered parking events)

3.6 In 2018/19, 75.2% of ESC's registered parking events were for up to two hours and this tariff level sees the proposals (at paragraph 3.11) reduce the cost of this time period for 53.3% of the existing tariff levels and a further 20% stay the same. To summarise, the cost for parking events up to two hours will be either £1.00 or £1.50 depending upon the town. This optimises the balance between managing parking demand and offering value for visitors choosing to park in ESC's car parks.

3.7 There is a perception that towns 'fail' because of a lack of 'free' parking acting as a barrier to the economic sustainability of many towns. Therefore, free parking (typically one-hour) is often requested by businesses via town and parish councils. Two towns make financial contributions to assist in the delivery of one-hour free parking within respective ESC car parks. However, many towns already offer free parking, albeit in un-regulated streets, timed bays on-street and/or car parks provided by other businesses such as supermarkets. Additionally, 27.7% of Excess Charge Notices (parking fines) are served due to expired pay-and-display tickets and this indicates visitors might be trying to 'rush' their trips and failing to complete their intended in the compressed time period. One-hour free parking will also exclude visitors to many businesses such as hair and beauty salons and pubs and restaurants. The significant proportion of parking fines issued suggests the one-hour free parking solution appeals to drivers but places them under pressure to be quick (perhaps limiting trips to only two or three businesses); they receive a parking fine as a consequence when they fail to return to their vehicle in time. This has a negative effect on their shopping/leisure experience and it is recommended town and parish councils do not make financial contributions effecting one-hour free parking solutions in ESC's car parks; instead, ESC will use data to manage parking demand in a fair and consistent manner supporting the localities in which it manages car parks. This enables town and parish councils to fund initiatives (other than 'free-parking') that promote their town's retail and leisure offers.

3.8 There can be a role for 'free' parking in balancing parking demand and it is best provided on-street in the form of thirty-minute limited waiting regulations given the convenience afforded by proximity to such trip attractors (e.g. cash points, newsagents, sandwich shops and convenience shops). Car parks provide better service for the longer dwell times (the leisure/shopping and commuter trip purposes). However, some towns and villages can not accommodate on-street parking and where this is the case, the proposed car park tariffs provide a thirty-minute 'free' parking option (managed via the parking app (paragraph 3.13)).

3.9 The three million registered parking events observed within ESC's car parks for 2018/19 indicate car parks operate in service of the towns supporting economic sustainability. This is proven further when it is considered that shoppers typically pay less than £3 for parking events up to four hours long and significantly less in some cases. Southwold and Lowestoft are the only exceptions to this, and visitors might pay up to £4. These fees paid only once or twice a week will not be a deterrent for many drivers if the town has an attractive retail and leisure offer. Many of ESC's car parks are gateways to the towns they



serve and offer additional services such as public conveniences, recycling and wayfinding to trip attractors in the locality.

#### **Other considerations and their benefits**

- 3.10 In addition to demand management, consideration is given to the following when setting tariffs:
- Customers achieve the same value for money should they need to extend the duration of their parking event.
  - The number of coins per tariff level - multiple coin payments require customers to carry more change in coins of different denominations placing added pressure on customers to pay more should they not have enough coin types. Multi-coin tariffs also fill up a pay-and-display machine's cash box quicker which often results in a machine going out of service. This leaves customers with 'payment anxiety' and the fear of receiving a parking fine for non-payment of their parking event (and thirty-three per cent of parking fines are served for this reason).
  - Cash collections - multiple coin tariffs require machines to be emptied more frequently and this has a negative effect on the environment due to increased vehicle miles. In recognition of ESC's Climate Emergency declaration, simplified tariffs will contribute to a reduction in carbon emissions for its cash collection service which currently completes approximately twenty-five thousand collections each year.
  - Banking - approximately fifty per cent of cash is one-pound coins and the rest in silver coins making cash counting, storage and banking an onerous and costly task negatively affecting service efficiency.
- 3.11 Appendix A compares by town the average cost of existing tariffs against recommendations for a much simpler approach based on the principles and considerations set out in this section of the report.
- 3.12 Appendix B lists simply the recommended tariffs for each car park by town.
- #### **Resident and customer experience – digital services**
- 3.13 Digital services provide opportunities beyond simply paying for a parking event. The parking app (RingGo) enables prospective visitors to see the locations, tariffs and occupancy of parking places before they travel. The app also provides navigation to their chosen parking place removing the need for 'patrolling' a town for a parking space; and it enables payment once at the parking place which removes the need for finding a pay-and-display machine and carrying the correct change for payment (paras. 3.1 and 3.10). The app also allows drivers to extend their parking event should they need to without returning to their vehicle, thereby avoiding receipt of a parking fine (para. 3.7). A 'convenience fee' of 20 pence per registered parking session is currently paid by the customer, however, it's proposed ESC pay the 'convenience fee' for all users making the RingGo service free for customers choosing to use the app to pay.
- 3.14 Permits, exemptions and special arrangements are currently administered by ESC, Norse, resource centres and third parties in many ways. There are many different types with different rules and some permits and exemptions are printed and some handwritten, but systems' data is limited and confirming the validity of permits/exemptions/special arrangements is difficult. Certainly, the Car Park Inspectors have no access to real-time databases confirming the validity of permits/exemptions/special arrangements and there is anecdotal evidence of permits/exemptions/special arrangements being misused. Additionally, the processes and interfaces for customers applying for permits/exemptions/special arrangements are disparate and confusing.
- 3.15 The current permit and exemption administration services can not operate for CPE. A review of the permits/exemptions/special arrangements is ongoing with the objective to

rationalise and simplify. The Agency Agreement delegates the 'function' for permit and exemption administration and ESC will implement a single 'permit management system' providing simplified customer self-serve functionality, as well as real-time validity of permits and exemptions enabling effective and efficient patrols facilitating enforcement where necessary. RingGo will have real-time interfaces with upgraded pay-and-display machines and the enforcement system facilitating the delivery of 'parking as a service'. The provision of RingGo will significantly simplify and enhance the parking experience of the drivers using it and the interfacing of digital systems will help to reduce the number of parking fines issued (for example, drivers using RingGo will no longer need to display a pay-and-display ticket so it can not fall off the dash or blow over and therefore PCNs will not be issued for these reasons (this is approximately twelve hundred parking fines per year, in addition to a proportion of the aforementioned thirty-three per cent)). ESC's focus is the delivery of services that are easy and convenient for drivers to use so that the serving of parking fines is necessary only when drivers deliberately park in contravention of the TRO or Off-street Order.

- 3.16 The systems employed are crucial to ensure the customer experience is much improved by providing 24/7 access to services including applying for permits, season tickets and reviewing PCN evidence with the ability to either pay a PCN or 'appeal' the serving of it.

#### **Parking Services operation**

- 3.17 In readiness for CPE administration, it is imperative parking services are well defined so customers can easily access services in order to ensure they are compliant with the rules and regulations for on-street and off-street parking management. To that end, the Council's new Parking Services team will be responsible for providing customers with the correct advice for highway and parking related enquiries; and to undertake the legislative process for the processing of PCNs. This will include:
- enabling customers to easily engage with Parking Services;
  - responding to all communications clearly and precisely within ESC and statutory timescales enabling customers to undertake necessary and appropriate action;
  - processing Permit, Exemption, and Dispensation applications efficiently and effectively;
  - patrolling, and enforcing where necessary, 'no waiting', 'no loading', 'bays' and some 'no stopping' kerb-space management regulations. Enforcement is limited to double and single yellow lines, double and single yellow kerb blips, yellow and white zigzags, bus stop and taxi clearways, loading and parking bays, and specific clearways;
  - ensuring all PCN challenges and representations are dealt with in a fair, reasonable and consistent manner considering the relevant facts and mitigating circumstances where applicable; and
  - understanding how customers perceive the quality of advice and instructions in accordance with relevant legislation.
- 3.18 The serving and processing of PCNs is completed in accordance with the 'Traffic Management Act 2004' and 'The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions'. The flexibilities and constraints of the legislation, along with the on-street TRO (para. 2.3), the Off-street Order (2.4) and the Notice processing and permit management system (para. 3.13 and 3.14), influence the rules for parking management.
- 3.19 It is recommended Cabinet adopt the approach to parking demand management discussed in paragraphs 3.1 to 3.10 and 3.13 to 3.16.
- 3.20 It is recommended Cabinet approve the proposed tariffs in Appendix B. This is necessary in order that the Off-street Parking Places Order can be drafted, and the configuration of

the digital solutions can be completed in readiness for administering parking services upon the delegation of CPE functions.

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

- 4.1 As outlined in Section 2, ESC's Parking Manager is working with SCC officers in order to deliver action ES29, specifically, "Encourage Suffolk County Council to devolve enforcement of On-street Car Parking to the District Councils".
- 4.2 As outlined in para. 3.2, ESC officers are co-ordinating to deliver action ES17, i.e. "Increase visitor numbers to East Suffolk outside of the main tourist seasons".
- 4.3 As discussed in paras. 3.13 to 3.16, ESC officers are liaising to ensure systems have channels to deliver ES21, i.e. "Provide an innovative, more customer friendly, transactional and intuitive Council website"

#### **5 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 5.1 The set-up costs for CPE administration are funded by SCC. Both SCC and ESC's officers are determining options to ensure systems have the required functionality for CPE and permit administration, and interfaces with third party systems are configured and work successfully in order to deliver effective and efficient CPE administration.
- 5.2 There is statutory guidance for reporting on Parking Services and officers are liaising to set-up accounts enabling financial reporting in the required way.
- 5.3 There are numerous legal documents that must be in place including the DFT's approval (SI), TROs and the Off-street parking places Order. Additionally, delegation and partnership agreements must be in place prior to CPE administration delivered by the Council's new Parking Services team. Appropriate advice and ratification are being secured from ESC's Legal team and others.

#### **6 OTHER KEY ISSUES**

- 6.1 This report has been prepared having considered the results of an Equality Impact Assessment. There are no issues for reporting at this stage of the project, but further assessments will take place at appropriate stages of the project.

#### **7 CONSULTATION**

- 7.1 Section 5 of 'The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions' applies, and communications will be delivered accordingly.

#### **8 OTHER OPTIONS CONSIDERED**

- 8.1 There is nothing relevant to report at this stage of the project programme.

#### **9 REASON FOR RECOMMENDATION**

- 9.1 The information in this report provides background and context for the following recommendation.

## RECOMMENDATIONS

1. That the parking demand management approach discussed in paragraphs 3.1 to 3.10 and 3.13 to 3.16 be approved.
2. That the RingGo 20 pence 'convenience fee' be incorporated in the cost of parking services delivery (paragraph 3.13).
2. That the proposed tariffs set out in Appendix B be approved.

## APPENDICES

Appendix A:	Comparison of existing and proposed tariff structures by town
Appendix B:	The proposed tariff structures for each car park by town

## 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
6 November 2018	Suffolk Coastal: Result of the stakeholder consultation on the draft East Suffolk Area Parking Plan (CAB 39/18)	<a href="http://www.eastsuffolk.gov.uk">www.eastsuffolk.gov.uk</a>
6 November 2018	Suffolk Coastal: Proposed simplification and alignment of the Suffolk Coastal and Waveney District car park tariffs to enable the creation of a single East Suffolk tariff structure (CAB 41/18)	<a href="http://www.eastsuffolk.gov.uk">www.eastsuffolk.gov.uk</a>
2 January 2019	Suffolk Coastal: Proposed new East Suffolk Off-street parking places Order (CAB 04/19)	<a href="http://www.eastsuffolk.gov.uk">www.eastsuffolk.gov.uk</a>

## APPENDIX A: COMPARISON OF EXISTING AND PROPOSED TARIFF STRUCTURES BY TOWN

The following tables provide data for:

- Ticket sales distribution: The proportion of tickets sold for the respective time period for 2018/19.
- Average of existing: The average fee charged for the respective time period for 2019/20 in that town.
- Proposed: The proposed fee for 2020/21 and it should be noted that the proposal is for only three time periods; up to 2 hours, up to 4 hours and all day.
- Difference: This is the difference between the fee for the respective 2019/20 time period and the next available for the proposed three time periods for 2020/21. Amounts preceded by a negative (-) indicates drivers will pay more in 2020/21 than in 2019/20; and the amounts preceded by a positive (+) indicates where drivers will pay less in 2020/21; and an equals (=) symbol means the same.

### Towns with tariffs equivalent to fifty pence per hour up to 4-hour dwell times

<b>Framlingham</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	11.9%	16.7%	20.3%	-	21.9%	25.2%
Average of existing	£0.20	£0.40	£0.60	-	£1.00	£1.50
Proposed	£0.00	-	£1.00	-	£2.00	£4.00
Difference	+£0.20	-£0.60	-£0.40	-	-£1.00	-£2.50

<b>Halesworth</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	-	83.4%	9.9%	3.2%	0.6%	1.8%
Average of existing	-	£0.43	£1.37	£2.10	£2.63	£3.42
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	-	-£0.57	+£0.37	+£0.10	+£0.63	-£0.58

<b>Kirkley</b>	Up to 90 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	62.9%	-	-	-	-	33.6%
Average of existing	£1.00	-	-	-	-	£2.80
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	=	-	+£1.80	-	+£0.80	-£1.20

<b>Leiston</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	-	49.7%	22.8%	-	12.1%	11.8%
Average of existing	-	£0.50	£1.00	-	£1.20	£2.00
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	-	-£0.50	=	-	-£0.80	-£2.00

<b>Oulton Broad</b>	Up to 90 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	34.7%	-	-	-	-	65.3%
Average of existing	£1.00	-	-	-	-	£2.80
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	=	-	+£1.80	-	+£0.80	-£1.20

<b>Saxmundham</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	-	22.3%	18.5%	-	22.5%	32.2%
Average of existing	-	£1.00	£1.20	-	£1.40	£2.30
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	-	=	+£0.20	-	-£0.60	-£1.70

<b>Sizewell</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	39.1%	41.2%	-	-	-	18.9%
Average of existing	-	£0.60	-	-	-	£1.20
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	=	-£0.40	+£0.20	-	-£0.80	-£2.80

<b>Wickham Market</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	-	86.5%	8.5%	-	2.7%	2.0%
Average of existing	-	£0.00	£1.00	-	£1.00	£1.50
Proposed	-	-	£1.00	-	£2.00	£4.00
Difference	-	-£1.00	=	-	-£1.00	-£2.50

<b>Woodbridge</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	19.0%	31.3%	29.7%	-	11.5%	4.2%
Average of existing	£0.50	£0.78	£1.37	-	£2.00	£4.00
Proposed	£0.00	-	£1.00	-	£2.00	£4.00
Difference	+£0.50	-£0.22	+£0.37	-	=	=

The all-day parking tariff will not be available for some of the car parks in order to increase the number of parking opportunities closest their trip attractor.

Season Tickets will be made available for some car parks and the fee is £65/month. This equates to a 25% discount on the equivalent day rate assuming a five-day working week and this equates to a value of £3/day.

**Towns with tariffs equivalent to seventy-five pence per hour up to 4-hour dwell times**

<b>Aldeburgh</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	3.3%	18.1%	10.1%	-	48.8%	13.2%
Average of existing	£0.40	£0.96	£1.20	-	£2.30	£3.94
Proposed	£0.00	-	£1.50	-	£3.00	£4.00
Difference	+£0.40	-£0.54	-£0.30	-	-£0.70	-£0.06

<b>Beccles</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	-	39.3%	28.9%	17.7%	2.0%	5.6%
Average of existing	-	£0.70	£1.40	£2.10	£2.80	£3.50
Proposed	-	-	£1.50		£3.00	£4.00
Difference	-	-£0.80	-£0.10	-£0.90	-£0.20	-£0.50

<b>Bungay</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution		78.3%	11.8%	4.9%	1.5%	2.6%
Average of existing		£0.00	£1.40	£2.10	£2.80	£3.50
Proposed		-	£1.50		£3.00	£4.00
Difference		-£1.00	-£0.10	-£0.90	-£0.20	-£0.50

<b>Felixstowe</b>	Up to 30 minutes	Up to 1 hour	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	10.2%	25.2%	36.1%	1.6%	17.9%	4.8%
Average of existing	£0.60	£1.06	£1.73	£1.80	£2.88	£4.85
Proposed	£0.00	-	£1.50	-	£3.00	£4.00
Difference	+£0.60	-£0.44	+£0.23	-£1.20	-£0.12	+£0.85



<b>Lowestoft</b>	Up to 1 hour	Up to 90 minutes	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	44.3%	0.7%	33.2%	10.1%	2.0%	4.6%
Average of existing	£1.04	£1.35	£2.08	£3.14	£3.70	£5.18
Proposed	-	-	£1.50	-	£3.00	£4.00
Difference	-£0.46	-£0.15	+£0.08	+£0.14	+£0.70	+£1.18

<b>Southwold</b>	Up to 1 hour	Up to 90 minutes	Up to 2 hours	Up to 3 hours	Up to 4 hours	All day
Ticket sales distribution	19.4%	-	25.9%	20.8%	11.0%	11.9%
Average of existing	£1.07	-	£2.13	£3.20	£4.27	£5.33
Proposed	-	-	£1.50	-	£3.00	£4.00
Difference	-£0.43	-	+£0.63	+£0.20	+£1.27	+£1.33

The all-day parking tariff will not be available for some of the car parks in order to increase the number of parking opportunities closest their trip attractor.

Season Tickets will be made available for some car parks and the fee is £65/month. This equates to a 25% discount on the equivalent day rate assuming a five-day working week and this equates to a value of £3/day.

As discussed in para. 3.1 of the main report, there are more than fifty different tariff levels in East Suffolk and rationalising and consolidating this many means some drivers will pay less for their parking event and some more. On average 59.0% of the tariffs are less or the same as in 2019/20.

As discussed in para. 3.6 of the main report, 75.2% of the Council's registered parking events were for up to two hours and this tariff level sees the proposals reduce the cost of this time period for 53.3% of the existing tariffs and a further 20% stay the same. To summarise, the cost for parking events up to two hours will be either £1.00 or £1.50 depending upon the town. This optimises the balance between managing parking demand and offering value for visitors choosing to park in the ESC's car parks.

## APPENDIX B: THE PROPOSED TARIFF STRUCTURES FOR EACH CAR PARK BY TOWN

<b>Aldeburgh</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Fort Green Car Park	£1.50	£3.00	£4.00	£65.00
King Street Car Park	£1.50	£3.00	-	-
Oakley Square Car Park	£1.50	£3.00	-	-
Slaughden Car Park**	£1.50	£3.00	£4.00	£65.00
Slaughden Sea Wall	No charge but designated for cars and motorcycles only.			
Thorpe Road Car Park	£1.50	£3.00	£4.00	£65.00
Thorpeness Beach Car Park*	£1.50	£3.00	£4.00	£65.00

<b>Beccles</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Blyburgate Car Park*	£1.50	£3.00	£4.00	£65.00
Hungate Car Park	£1.50	£3.00	-	-
Kilbrack Car Park	No charge but designated for cars and motorcycles only.			
Newgate Car Park	£1.50	£3.00	-	-

<b>Bungay</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Boyscott Lane Car Park	No charge but designated for cars and motorcycles only.			
Nethergate Car Park**	£1.50	£3.00	£4.00	£65.00
Priory Lane Car Park*	£1.50	£3.00	-	-
Scales Street Car Park	£1.50	£3.00	£4.00	£65.00
Wharton Street Car Park*	£1.50	£3.00	-	-

<b>Felixstowe</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Arwela Road Car Park	£1.50	£3.00	£4.00	£65.00
Beach Station Car Park	£1.50	£3.00	£4.00	£65.00
Brackenbury Fort Car Park*	£1.50	£3.00	£4.00	£65.00
Clifflands Car Park*	£1.50	£3.00	£4.00	£65.00
Convalescent Hill Car Park*	£1.50	£3.00	£4.00	£65.00
Crescent Road Car Park	£1.50	£3.00	-	-
Felixstowe Pier Car Park*	£1.50	£3.00	-	-
Garrison Lane Car Park**	£1.50	£3.00	£4.00	£65.00
Golf Road Car Park	£1.50	£3.00	£4.00	£65.00
Highfield Road Car Park	£1.50	£3.00	-	-
Landguard Car Park*	£1.50	£3.00	£4.00	£65.00
Manor Terrace Car Park*&**	£1.50	£3.00	£4.00	£65.00
Martello Park North Car Park	£1.50	£3.00	£4.00	£65.00
Martello Park South Car Park	£1.50	£3.00	£4.00	£65.00
Ranelagh Road Car Park	£1.50	£3.00	£4.00	£65.00
Spa Pavilion Car Park	£1.50	£3.00	-	-
The Grove Car Park	No charge but designated for cars and motorcycles only.			
The Promenade Car Park	£1.50	£3.00	£4.00	£65.00
Undercliff Car Park	£1.50	£3.00	-	-
Searson's Farm Car Park	No charge but designated for cars and motorcycles only.			

<b>Framlingham</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Fore Street Car Park*	£1.00	£2.00	£4.00	£65.00
The Elms Car Park*&**	£1.00	£2.00	£4.00	£65.00
Market Hill Car Park*&**	£1.00	£2.00	-	-

<b>Halesworth</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Angel (North) Car Park*	£1.00	£2.00	£4.00	£65.00
Angel (South) Car Park*	£1.00	£2.00	£4.00	£65.00
Bridge Street Car Park*	£1.00	£2.00	£4.00	£65.00
Station Road Car Park	£1.00	£2.00	£4.00	£65.00
Thoroughfare Car Park	£1.00	£2.00	-	-

<b>Kirkley</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
All Saints Car Park	No charge but designated for cars and motorcycles only.			
Clifton Road Car Park*	£1.00	£2.00	£4.00	£65.00
Pakefield Cliffs Car Park	No charge but designated for cars and motorcycles only.			
Pakefield Road Car Park*	£1.00	£2.00	£4.00	£65.00
Pakefield Street Car Park*	£1.00	£2.00	£4.00	£65.00

<b>Leiston</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
High Street Car Park*	£1.00	£2.00	£4.00	£65.00
Main Street Car Park	No charge but designated for cars and motorcycles only.			
Sizewell Beach Car Park*	£1.00	£2.00	£4.00	£65.00
Sizewell Road Car Park*	£1.00	£2.00	£4.00	£65.00
Valley Road Car Park	No charge but designated for cars and motorcycles only.			

<b>Lowestoft</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Adrian Road Car Park	£1.50	£3.00	£4.00	£65.00
Alexandra Road Car Park	£1.50	£3.00	£4.00	£65.00
Battery Green Car Park	£1.50	£3.00	-	-
Belvedere Road Car Park	£1.50	£3.00	£4.00	£65.00
Britten Centre Car Park*	£1.50	£3.00	£4.00	-
Christ Church Car Park	No charge but designated for cars and motorcycles only.			
Clapham Road Car Park	£1.50	£3.00	-	-
Claremont Pier Car Park	£1.50	£3.00	£4.00	-
Kirkley Cliff Car Park*	£1.50	£3.00	£4.00	£65.00
Mariners Street Car Park	No charge but designated for cars and motorcycles only.			
Regent Road Car Park	£1.50	£3.00	£4.00	£65.00
Royal Green Car Park*	£1.50	£3.00	£4.00	£65.00
St Peters Street Car Park*	£1.50	£3.00	-	-
Tennyson Road Car Park	£1.50	£3.00	£4.00	£65.00
Waveney Sports Centre Car Park	No charge but designated for cars and motorcycles only.			
Whapload Road Car Park	£1.50	£3.00	£4.00	£65.00

<b>Melton</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Melton Riverside Car Park	No charge but designated for cars and motorcycles only.			
Melton Street Car Park	No charge but designated for cars and motorcycles only.			

<b>Oulton Broad</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Nicholas Everitts Car Park*	£1.00	£2.00	£4.00	£65.00
The Boulevard Car Park	£1.00	£2.00	£4.00	£65.00

<b>Saxmundham</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Market Place Car Park	£1.00	£2.00	£4.00	£65.00

<b>Southwold</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Ferry Road Car Park*	£1.50	£3.00	£4.00	£65.00
Ferry Road (North) Car Park	No charge but designated for cars and motorcycles only.			
Harbour East Car Park*	£1.50	£3.00	£4.00	£65.00
Harbour West Car Park	No charge but designated for cars and motorcycles only.			
Southwold Pier Car Park*	£1.50	£3.00	£4.00	£65.00

<b>Wickham Market</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Chapel Lane Car Park*	£1.00	£2.00	-	-
The Village Car Park*	£1.00	£2.00	-	-
The Hill Car Park	£1.00	£2.00	£4.00	£65.00

<b>Woodbridge</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Broomheath Car Park	No charge but designated for cars and motorcycles only.			
Deben Car Park	£1.00	£2.00	£4.00	£65.00
Hamblin Car Parks*	£1.00	£2.00	-	-
Lime Kiln Quay Car Park	£1.00	£2.00	£4.00	£65.00
Oak Lane Car Park	£1.00	£2.00	-	-
The Station Car Park*	£1.00	£2.00	£4.00	£65.00
Theatre Street Car Park	£1.00	£2.00	£4.00	£65.00

<b>Wrentham</b>	Up to 2 hours	Up to 4 hours	All day	Season Ticket
Wrentham Car Park	No charge but designated for cars and motorcycles only.			

<b>Others</b>	
Bawdsey Quay Car Park	No charge but designated for cars and motorcycles only.
Iken Car Park	No charge but designated for cars and motorcycles only.
Nacton Shore Car Park	No charge but designated for cars and motorcycles only.
Sutton Heath Picnic Area Car Park	No charge but designated for cars and motorcycles only.
Sutton Heath Woodland Car Park	No charge but designated for cars and motorcycles only.
Upper Hollesley Common Car Park	No charge but designated for cars and motorcycles only.

\*Thirty minute parking tariff (no charge) managed via the RingGo app. Car parks that do not offer this convenience concession have free parking opportunities in the vicinity e.g. on-street limited waiting regulations or un-regulated kerb-space; and/or car parks provided by others.

\*\*Introduction of a tariff



## CABINET

Tuesday 7 January 2020

### FEES AND CHARGES FOR 2020/21

#### 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 Business Plan and relevant central Government legislation.
4. Cabinet is asked to consider and approve the schedule of Discretionary Fees and Charges 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 charges is 1<sup>st</sup> April 2020

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>Councillor Steve Gallant Leader of the Council and Cabinet Member with responsibility for Resources</p> <p>Councillor Maurice Cook Assistant Cabinet Member for Resources</p>
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<b>Supporting Officer:</b>	<p>Simon Taylor  Chief Finance Officer and Section 151 Officer  01394 444570  <a href="mailto:simon.taylor@eastsoffolk.gov.uk">simon.taylor@eastsoffolk.gov.uk</a></p> <p>Lorraine Rogers  Finance Manager and Deputy Section 151 Officer  01502 523667  <a href="mailto:lorraine.rogers@eastsoffolk.gov.uk">lorraine.rogers@eastsoffolk.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 services, 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.
- 1.5 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".
- 1.6 Fees and Charges can be categorised into two groups:
- Discretionary Fees and Charges for approval by the Cabinet; and
  - Statutory Fees and Charges that have to be set in accordance with legislation and Central Government Regulations.
- 1.7 The purpose of this report is to seek approval for the Discretionary Fees and Charges to be implemented in 2020/21 by East Suffolk Council. These are shown in Appendix A.
- 1.8 Generally any increase in fees and charges will take effect from 1<sup>st</sup> April 2020. However, if the fees and charges are set by statute these will vary per the date set by Government regulation. Details of the date of introduction are included in the Appendices to this report.

## **2 KEY POINTS**

- 2.1 The proposed Discretionary fees and charges for 2020/21 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.

- 2.2 Other Discretionary Fees and Charges which do not fall into any of the above, have been increased by the Retail Prices Index (2.9%, June 2019), subject to rounding.
- 2.3 The proposed charges for Car Parking contained in Appendix A are subject to approval by the Cabinet of the report on Parking Services considered earlier on this agenda.
- 2.4 Discretionary Planning charges, such as Pre Application Planning Advice, are currently being reviewed on a county-wide basis, and no changes to these are proposed at this stage. Proposals for these charges will be brought forward at a later date.
- 2.5 As noted earlier in this report, some statutory fees are set by Government statute and councils usually have no control over service pricing. In some cases, such as licences, the charges have been prescribed in the original legislation and have not been increased for a number of years.
- 2.6 Local Authority Pollution Prevention and Control (LAPPC) fees are set nationally by Central Government and there is no discretion to vary these. The fee period for these is April 2020 to March 2021, and the Government is expected to notify these fees in April. The Schedule of Fees and Charges on the Council website will be updated when this information, and other outstanding fees and charges awaited from Central Government, are available.
- 2.7 Planning application fees are set by the Government under Town and Country Planning Regulations and were last increased in January 2018.

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

- 3.1 Income generated from fees and charges contributes towards the East Suffolk Business Plan strategy of Financial Self Sufficiency, in ensuring full recovery of costs and taking opportunities to introduce new fees and charges.

### **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 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 This report has been prepared after taking into account the results of Equality Impact Assessments.

## **6 CONSULTATION**

- 6.1 The proposals have been made by Heads of Service with input from budget managers. There have also been discussions with both Suffolk Coastal Norse and Waveney Norse.

## **7 OTHER OPTIONS CONSIDERED**

- 7.1 The policy option of not reviewing Fees and Charges for 2020/21 was rejected in order 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 fees and charges from 1<sup>st</sup> April 2020.

### **RECOMMENDATIONS**

1. That the Discretionary Fees and Charges set out in Appendix A be approved for implementation from 1st April 2020.
2. That Cabinet notes the level of the fees and charges set by statute and the timing of any increase in these as set out in Appendix B.

### **APPENDICES**

<b>Appendix A</b>	Proposed schedule of Discretionary Fees and Charges from 1 <sup>st</sup> April 2020
<b>Appendix B</b>	Schedule of Statutory Fees and Charges from 1 <sup>st</sup> April 2020

### **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.

<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

## 2020/21

### East Suffolk Council



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## FEES AND CHARGES NOTE

### **Note**

Generally any increase in fees and charges will take effect from 1<sup>st</sup> April 2020 and apply through to 31<sup>st</sup> March 2021. 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

<b>Animal Welfare</b>	<b>2020/21</b>	<b>VAT Status</b>
Pet shops	£285.00	OS
Dog breeding establishments	£285.00	OS
Dangerous wild animals	£438.00	OS
Animal boarding establishments	£285.00	OS
Riding establishments	£285.00	OS
Additional fee for each additional activity*	£63.00	OS
Re-rating request*	£145.00	OS
Appeal inspection fee*	£145.00	OS
<b>Variation application fee:</b>		
1 star	£130.00	OS
2 star	£65.00	OS
3 star	£43.00	OS
4 star	£33.00	OS
5 star	£26.00	OS
Paperwork only variation (all ratings)*	£26.00	OS
<b>All the above fees marked with an asterisk (*) plus vet fees cost (net of VAT), if required</b>		
<b>Advice regarding various licences</b>		
Hourly rate	£67.00	S
<b>Zoo Licensing</b>		
Notice of intention to apply for a zoo licence	£125.00	OS
Application for the grant of a new zoo licence for four years	£438.00	OS
Special inspection of a licenced zoo	£155.00	OS
Periodic inspections (renewal & every three years)	£641.00	OS
<b>Vet inspection fees are in addition to all animal welfare licences</b>		

## ENVIRONMENTAL & PORT HEALTH

### 1.2 Charges for Registration

<b>Skin Piercing</b>	<b>2020/21</b>	<b>VAT Status</b>
Acupuncture, tattooing, ear piercing, electrolysis (premises)	£253.00	OS
Acupuncture, tattooing, ear piercing, electrolysis (persons)	£150.00	OS

### 1.3 Food Premises Register

	<b>2020/21</b>	<b>VAT Status</b>
Copy of food premises register	£140.00	OS
Copy of food premises register - single entry	£18.00	OS

### 1.4 Certificates & Health Charges

	<b>2020/21</b>	<b>VAT Status</b>
Issuing of export health certificate - Local Authority	£114.00	OS
Issuing of export health certificate - APHA	£222.00	OS
Issuing of export certificate of conformity	£88.00	OS

### 1.5 Health Education Courses

	<b>2020/21</b>	<b>VAT Status</b>
Level 2 Award in Food Safety and Catering	£72.00	EX
Level 2 Award in Food Safety and Catering (refresher)	£42.30	EX
Level 2 Award in Health and Safety at Work	£72.00	EX
Examination re-sit fee for a Level 2 course	£42.30	EX

## ENVIRONMENTAL & PORT HEALTH

### 1.6 Voluntary Surrender Certificates

	2020/21	VAT Status
Issue of voluntary surrender certificates	£175.00	OS
Disposal of food	Actual Cost (net of VAT)	

### 1.7 Food Hygiene Ratings

	2020/21	VAT Status
Revisit	£130.00	OS

### 1.8 Safer Food, Better Business (SFBB)

	2020/21	VAT Status
SFBB for caterers	£19.00	ZE
SFBB for caterers with residential care homes supplement	£19.00	ZE
SFBB for retailers	£19.00	ZE
SFBB Indian, Pakistani, Bangladeshi and Sri Lankan cuisines	£19.00	ZE
SFBB Chinese cuisine - English language version	£19.00	ZE
SFBB Chinese cuisine - Cantonese language version	£19.00	ZE
SFBB childminders	£12.00	S
12 month diary pack	£5.00	S

### 1.9 Dog Control

	2020/21	VAT Status
Costs of reclaiming a stray dog	£158.00	OS
Plus administration costs	£35.00	OS
Plus daily kennelling fees	£14.00	OS
Plus vets fees	Actual Cost (net of VAT)	



## ENVIRONMENTAL & PORT HEALTH

### 1.10 Provision of Supplementary Environmental Information

	2020/21	VAT Status
<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	£103.00	S
<b>Complex Requests (i.e. taking more than 2 hours to process):</b>		
Flat rate	£103.00	S
Plus charge per hour	£67.00	S

## LEGAL & DEMOCRATIC SERVICES

### 2.1 Charges for licences

<b>Sex Establishments</b>	<b>2020/21</b>	<b>VAT Status</b>
Sex establishments - initial grant	£2,058.00	NB
Sex establishments - annual fee	£1,750.00	NB
<b>Street Trading</b>		
Consents and licences	£383.00	NB
Daily fee	£25.00	NB
<b>Boat and Boatman Licences</b>		
Pleasure boat licence (up to 12 passengers)	£125.00	NB
Rowing boat (4 passengers)	£62.00	NB

### 2.2 Hackney carriages / Private hire vehicles

	<b>2020/21</b>	<b>VAT Status</b>
Horse drawn vehicle or private hire vehicle	£45.00	NB
Disclosure & Barring checks / set by Disclosure & Barring Service	£40.00	NB
DVLA checks / Set by DVLA	£5.15	NB
Vehicle ID plate initial charge (with bracket)	£28.00	NB
Vehicle ID plate renewal charges	£16.00	NB
Temporary vehicle	£45.00	NB
Vehicle transfer to new owner	£45.00	NB

## LEGAL & DEMOCRATIC SERVICES

### 2.2 Hackney carriages / Private hire vehicles (continued)

The below charges come into effect from 1st February 2020	2020/21	VAT Status
Motorised Hackney carriage	£307.00	NB
Discount for vehicles with mobility seat provision for people with disability	£154.00	NB
Private hire vehicles	£266.00	NB
Discount for vehicles with mobility seat provision for people with disability	£133.00	NB
<b>Driver's Licences</b>		
Initial application test	£45.00	NB
First application	£155.00	NB
Three year licence	£203.00	NB
<b>Private Hire Operations Licences</b>		
Knowledge Test	£51.00	NB
<b>The below charges come into effect from 1st February 2020</b>		
Five year licence owner/driver	£240.00	NB
Five year licence 2 - 5 cars	£405.00	NB
Five year licence over 5 cars	£798.00	NB

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		
	Private hire retest	Single axle trailer - inspection
	Unfit vehicle notice	Failure to keep vehicle inspection appointment
	Double axle trailer - inspection	Taxi/private hire vehicle plate replacement

Please contact **(01502) 527100** or **(01394) 444000** for more information.

## LEGAL & DEMOCRATIC SERVICES

### 2.3 Premises licences (Gambling Act 2005)

	2020/21				
	Premises Licence Fee (New App.)	Premises Licence Fee (Annual Fee)	Misc. Fees (App. to Vary)	Misc. Fees (App. to Transfer)	VAT Status
Bingo Club	£1,544.00	£750.00	£1,029.00	£978.00	OS
Betting Premise (excluding tracks)	£1,544.00	£600.00	£1,029.00	£978.00	OS
Tracks	£1,544.00	£618.00	£1,029.00	£950.00	OS
Family Entertainment Centre	£1,544.00	£618.00	£1,000.00	£950.00	OS
Adult Gaming Centre	£1,544.00	£618.00	£1,000.00	£978.00	OS

## OPERATIONS

### 3.1 Parking Services (tariff structure by town)

Fees subject to approval as part of separate report on Parking Services - Cabinet 7th January 2020

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
<b>ALDEBURGH</b>				
Fort Green Car Park	£1.50	£3.00	£4.00	£65.00
King Street Car Park	£1.50	£3.00	-	-
Oakley Square Car Park	£1.50	£3.00	-	-
Slaughden Car Park **	£1.50	£3.00	£4.00	£65.00
Slaughden Sea Wall Car Park	No Charge but designated for cars and motorcycles only			
Thorpeness Beach Car Park *	£1.50	£3.00	£4.00	£65.00
Thorpe Road Car Park	£1.50	£3.00	£4.00	£65.00
<b>BECCLES</b>				
Blyburgate Car Park *	£1.50	£3.00	£4.00	£65.00
Hungate Car Park	£1.50	£3.00	-	-
Killbrack Car Park	No Charge but designated for cars and motorcycles only			
Newgate Car Park	£1.50	£3.00	-	-
<b>BUNGAY</b>				
Boyscott Lane Car Park	No Charge but designated for cars and motorcycles only			
Nethergate Car Park **	£1.50	£3.00	£4.00	£65.00
Priory Lane Car Park*	£1.50	£3.00	-	-
Scales Street Car Park	£1.50	£3.00	£4.00	£65.00
Wharton Street Car Park *	£1.50	£3.00	-	-

## OPERATIONS

### 3.1 Parking Services (tariff structure by town) (continued)

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
<b>FELIXSTOWE</b>				
Arwela Road Car Park	£1.50	£3.00	£4.00	£65.00
Beach Station Car Park	£1.50	£3.00	£4.00	£65.00
Brackenbury Fort Car Park*	£1.50	£3.00	£4.00	£65.00
Clifflands Car Park *	£1.50	£3.00	£4.00	£65.00
Convalescent Hill Car Park *	£1.50	£3.00	£4.00	£65.00
Crescent Road Car Park	£1.50	£3.00	-	-
Felixstowe Pier Car Park*	£1.50	£3.00	-	-
Garrison Lane Car Park **	£1.50	£3.00	£4.00	£65.00
Golf Road Car Park	£1.50	£3.00	£4.00	£65.00
Highfield Road Car Park	£1.50	£3.00	-	-
Landguard Car Park*	£1.50	£3.00	£4.00	£65.00
Manor Terrace Car Park *&**	£1.50	£3.00	£4.00	£65.00
Martello Park North Car Park	£1.50	£3.00	£4.00	£65.00
Martello Park South Car Park	£1.50	£3.00	£4.00	£65.00
Ranelagh Road Car Park	£1.50	£3.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking Services (tariff structure by town) (continued)

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
<b>FELIXSTOWE</b>				
Searson's Farm Car Park	No Charge but designated for cars and motorcycles only			
Spa Pavilion Car Park	£1.50	£3.00	-	-
The Grove Car Park	No Charge but designated for cars and motorcycles only			
The Promenade Car Park	£1.50	£3.00	£4.00	£65.00
Undercliff Car Park	£1.50	£3.00	-	-
<b>FRAMLINGHAM</b>				
Fore Street Car Park*	£1.00	£2.00	£4.00	£65.00
The Elms Car Park*&**	£1.00	£2.00	£4.00	£65.00
Market Hill Car Park *&**	£1.00	£2.00	-	-
<b>HALESWORTH</b>				
Angel Lane North Car Park *	£1.00	£2.00	£4.00	£65.00
Angel Lane South Car Park *	£1.00	£2.00	£4.00	£65.00
Bridge Street Car Park*	£1.00	£2.00	£4.00	£65.00
Station Road Car Park	£1.00	£2.00	£4.00	£65.00
Thoroughfare Car Park	£1.00	£2.00	-	-

## OPERATIONS

### 3.1 Parking Services (tariff structure by town) (continued)

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
KIRKLEY				
All Saints Car Park	No Charge but designated for cars and motorcycles only			
Clifton Road Car Park *	£1.00	£2.00	£4.00	£65.00
Pakefield Cliffs Car Park	No Charge but designated for cars and motorcycles only			
Pakefield Road Car Park *	£1.00	£2.00	£4.00	£65.00
Pakefield Street Car Park *	£1.00	£2.00	£4.00	£65.00
LEISTON				
High Street Car Park *	£1.00	£2.00	£4.00	£65.00
Main Street Car Park	No Charge but designated for cars and motorcycles only			
Sizewell Beach Car Park *	£1.00	£2.00	£4.00	£65.00
Sizewell Road Car Park *	£1.00	£2.00	£4.00	£65.00
Valley Road Car Park	No Charge but designated for cars and motorcycles only			
LOWESTOFT				
Adrian Road Car Park	£1.50	£3.00	£4.00	£65.00
Alexandra Road Car Park	£1.50	£3.00	£4.00	£65.00
Battery Green Car Park	£1.50	£3.00	-	-
Belvedere Road Car Park	£1.50	£3.00	£4.00	£65.00



## OPERATIONS

### 3.1 Parking Services (tariff structure by town) (continued)

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
LOWESTOFT				
Britten Centre Car Park *	£1.50	£3.00	£4.00	-
Christ Church Car Park	No Charge but designated for cars and motorcycles only			
Clapham Road Car Park	£1.50	£3.00	-	-
Claremont Pier Car Park	£1.50	£3.00	£4.00	-
Kirkley Cliff Car Park *	£1.50	£3.00	£4.00	£65.00
Mariners Street Car Park *	No Charge but designated for cars and motorcycles only			
Regent Road Car Park	£1.50	£3.00	£4.00	£65.00
Royal Green Car Park *	£1.50	£3.00	£4.00	£65.00
St Peters Street Car Park *	£1.50	£3.00	-	-
Tennyson Road Car Park	£1.50	£3.00	£4.00	£65.00
Waveney Sports Centre Car Park	No Charge but designated for cars and motorcycles only			
Whapload Road Car Park	£1.50	£3.00	£4.00	£65.00
MELTON				
Melton Riverside Car Park	No Charge but designated for cars and motorcycles only			
Melton Street Car Park	No Charge but designated for cars and motorcycles only			
OULTON BROAD				
Nicholas Everitts Park Car Park *	£1.00	£2.00	£4.00	£65.00
The Boulevard Car Park	£1.00	£2.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking Services (tariff structure by town) (continued)

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
<b>SAXMUNDHAM</b>				
Market Place Car Park	£1.00	£2.00	£4.00	£65.00
<b>SOUTHWOLD</b>				
Ferry Road (North) Car Park	No Charge but designated for cars and motorcycles only			
Ferry Road Car Park *	£1.50	£3.00	£4.00	£65.00
Harbour East Car Park *	£1.50	£3.00	£4.00	£65.00
Harbour West Car Park	No Charge but designated for cars and motorcycles only			
Southwold Pier Car Park *	£1.50	£3.00	£4.00	£65.00
<b>WICKHAM MARKET</b>				
Chapel Lane Car Park *	£1.00	£2.00	-	-
High Street Car Park *	£1.00	£2.00	-	-
The Hill Car Park	£1.00	£2.00	£4.00	£65.00
<b>WOODBIDGE</b>				
Deben Car Park	£1.00	£2.00	£4.00	£65.00
Hamblin Road Car Park *	£1.00	£2.00	-	-
Lime Kiln Quay Car Park	£1.00	£2.00	£4.00	£65.00
Oak Lane Car Park	£1.00	£2.00	-	-
The Station Car Park *	£1.00	£2.00	£4.00	£65.00
Theatre Street Car Park	£1.00	£2.00	£4.00	£65.00

## OPERATIONS

### 3.1 Parking Services (tariff structure by town) (continued)

Parking Site	Tariff			Season Tickets
VAT Status	S	S	S	S
	Up to 2 hours	Up to 4 hours	All Day	1 month
COUNTRYSIDE				
Bawdsey Quay Car Park	No Charge but designated for cars and motorcycles only			
Broomheath Car Park	No Charge but designated for cars and motorcycles only			
Iken Car Park	No Charge but designated for cars and motorcycles only			
Nacton Shore Car Park	No Charge but designated for cars and motorcycles only			
Sutton Heath Car Park	No Charge but designated for cars and motorcycles only			
Upper Hollesley Common Car Park	No Charge but designated for cars and motorcycles only			
WRENTHAM				
Wrentham	No Charge but designated for cars and motorcycles only			

All above locations marked with an asterisk (\*) have 30 minutes convenience concession free of charge managed via the RingGo app. Car parks that do not offer this convenience concession have free parking opportunities in the vicinity e.g. on-street limited waiting regulations or un-regulated kerb-space; and/or car parks provided by others.

All above locations marked with an asterisk (\*\*) have implemented an introduction of tariff.

## OPERATIONS

### 3.2 Parking Services (resident permit)

Resident Permit	2020/21	VAT Status
One year	£30.00	S

### 3.3 Parking Services (Penalty Charge Notices)

ECNs have now been made redundant and have been replaced with Penalty Charge Notices (PCNs). For more information please visit UK Statutory Instrument 2007 No.3487 - The Civil Enforcement of Parking Contraventions (Guideline on Levels of Charges)(England) Order 2007, Schedule to Article 2, Table 1, Band 2.

<http://www.legislation.gov.uk/ukxi/2007/3487/schedule/made>

Penalty Charge	2020/21	VAT Status
Higher	£70.00	OS
Lower	£50.00	OS
50% discount if paid within 14 days		

### 3.4 Collection of Household Waste

Bulky Household Waste	2020/21	VAT Status
For the collection of up to three single items of bulky household waste	£45.50	OS
Each additional item (above three items) of bulky household waste	£15.50	OS
Other/special collections (by quotation)	POA	OS
<b>Garden Waste Collection (fortnightly)</b>		
Per green bin (per annum)	£43.50	OS
Green bin delivery	£10.50	OS
Delivery of waste bin (residual and recycling)	£33.50	OS
Delivery of additional household waste bin (residual and recycling)	£33.50	OS

## OPERATIONS

### 3.5 Caravan & Camping Sites

<b>Southwold Harbour Site</b>	<b>2020/21</b>	<b>VAT Status</b>
Static caravan - site fee (March - November)	£2,325.00	S
Static caravan - site fee (December - February)	£200.00	S
New caravan - plot fee	£1,800.00	S
Additional charge for electricity site	£550.00	S
<b>Additional Charges - static caravan</b>		
Harbour side supplement front line	£197.00	S
Blackshore supplement front line	£171.00	S
External van cleaning	£70.00	S
External window & door clean	£12.00	S
Under van edge trim & weed killer spray	£22.00	S
<b>All below fees are charged on a per night basis</b>		
Tourers/motorised vans/tents (low season) Inc 2 adults	£26.00	S
Tourers/motorised vans/tents (peak season) Inc 2 adults	£31.25	S
Electricity per night	£5.00	S
Additional adult	£4.20	S
Additional child	£1.60	S
Awnings/gazebos/canopies	£7.80	S
Organised groups (To be negotiated in advance)	By negotiation	S
Single backpacker (no vehicle)*	£13.00	S
Key sale for toilet block	£27.50	S
Battery charging	£6.75	S
Ice packs	£1.25	S
Mobile phone charging	£1.25	S
<b>* With discretion of caravan site manager at time of arrival</b>		

## OPERATIONS

### 3.6 Harbour & Annual Licences (beach & boat related)

<b>Regular Users (per annum)</b>	<b>2020/21</b>	<b>VAT Status</b>
Mooring fees	£655.00	S
Tenders/canoe/kayak	£35.00	S
Tenders/canoe/kayak day rate	£4.40	S
<b>Harbour Dues (per annum)</b>		
Up to 6100mm	£72.00	S
6100mm up to 9150mm	£138.00	S
9150mm up to 12200mm	£175.00	S
12200mm up to 15250mm	£230.00	S
Each additional 305mm over 15250mm	£6.00	S
<b>Other Charges (per annum)</b>		
Large hut sites	£395.00	EX
Small hut sites	£267.00	EX
Hut selling fish on a regular basis	Under review	EX
<b>Stage Sites</b>		
1E - 10E	£1,120.00	S
All other sites on Southwold bank	£580.00	S
All other sites on Walberswick bank	£545.00	S
Stage 25 LCC harbour dues	Per individual boat	S

## OPERATIONS

### 3.6 Harbour & Annual Licences (beach & boat related) (continued)

<b>W10 Mooring</b>	<b>2020/21</b>	<b>VAT Status</b>
Up to 6100mm	£20.30	S
6100mm up to 9150mm	£24.00	S
9150mm up to 12200mm	£29.50	S
12200mm up to 15250mm	£37.50	S
Each additional 305mm over 15250mm	£1.85	S
Harbour dues	£9.50	S
Electric charge (normal)	£4.50	S
Electric charge (heavy use)	£13.00	S
<b>Other Charges</b>		
Storage ashore (per 305mm)	£2.70	S
Electric charge (weekly)	£30.00	S
Mooring winter charge (per 305mm/month)	£3.90	S
Mooring berth on north dock wall (including use of compound & facilities) per month	£145.00	S
<b>Licences</b>		
Beach Licences		
- Aldeburgh and Felixstowe	£58.00	OS
- Sizewell	£46.50	OS
Sale of fish from council land	Variable	OS
Boats on beach	£128.00	S
Boats in compound at The Dip	£128.00	S
Launch only permit	£63.00	OS
Fee for return of confiscated boats	Variable	S

## OPERATIONS

### 3.7 Recreation Areas & Outdoor Sports

Beccles Sports Ground	2020/21	VAT Status
<b>Cricket</b>		
<b>Adult one off match charge</b>		
- Weekdays	£67.25	S
- Weekdays (evenings)	£51.25	S
- Weekends and Bank Holidays	£91.25	S
<b>Adult block booking (minimum 11 matches)</b>		
- Weekdays	£57.75	S
- Weekdays (evenings)	£43.75	S
- Weekends and Bank Holidays	£82.25	S
<b>Junior one off match charge</b>		
- Weekdays	£45.00	S
- Weekdays (evenings)	£35.25	S
- Weekends and Bank Holidays	£66.25	S
<b>Junior block booking (minimum 11 matches)</b>		
- Weekdays	£38.50	S
- Weekdays (evenings)	£32.25	S
- Weekends and Bank Holidays	£58.75	S
<b>All weather surface</b>		
- Weekdays	£48.25	S
- Weekdays (evenings)	£32.25	S
- Weekends and Bank Holidays	£54.00	S
- Weekends and Bank Holidays (evenings)	£40.25	S



## OPERATIONS

### 3.7 Recreation Areas & Outdoor Sports (continued)

Beccles Sports Ground	2020/21	VAT Status
<b>Football/Rugby</b>		
<b>Adult one off match charge</b>		
- Weekdays	£48.25	S
- Weekends and Bank Holidays	£63.25	S
<b>Adult block booking (minimum 11 matches)</b>		
- Weekdays	£39.75	S
- Weekends and Bank Holidays	£49.75	S
<b>Junior one off match charge</b>		
- Weekdays	£31.00	S
- Weekends and Bank Holidays	£37.00	S
<b>Junior block booking (minimum 11 matches)</b>		
- Weekdays	£18.25	S
- Weekends and Bank Holidays	£23.50	S
<b>Walton Recreation Ground - Felixstowe</b>	<b>2020/21</b>	<b>VAT Status</b>
<b>Football</b>		
Mini soccer pitch		
- One off	£24.00	S
- Regular	£15.50	S

## OPERATIONS

### 3.7 Recreation Areas & Outdoor Sports (continued)

Coronation Sports Ground Felixstowe	2020/21	VAT Status
<b>Cricket</b>		
<b>Adult one off match charge</b>		
- Weekdays	£50.25	S
- Weekdays (evenings)	£43.25	S
- Weekends and Bank Holidays	£77.25	S
<b>Adult block booking (minimum 8 matches)</b>		
- Weekdays	£42.25	S
- Weekdays (evenings)	£36.50	S
- Weekends and Bank Holidays	£64.75	S
<b>Junior one off match charge</b>		
- Weekdays	£32.75	S
- Weekdays (evenings)	£29.50	S
- Weekends and Bank Holidays	£51.75	S
<b>Junior block booking (minimum 11 matches)</b>		
- Weekdays	£24.75	S
- Weekdays (evenings)	£22.00	S
- Weekends and Bank Holidays	£38.50	S
<b>Football/Rugby</b>		
<b>Adult one off match charge</b>		
- Weekdays	£48.25	S
- Weekends and Bank Holidays	£64.25	S

## OPERATIONS

### 3.7 Recreation Areas & Outdoor Sports (continued)

Coronation Sports Ground Felixstowe (continued)	2020/21	VAT Status
<b>Football/Rugby</b>		
<b>Adult block booking (minimum 8 matches)</b>		
- Weekdays	£39.75	S
- Weekends and Bank Holidays	£53.25	S
<b>Junior one off match charge</b>		
- Weekdays	£31.00	S
- Weekends and Bank Holidays	£42.25	S
<b>Junior block booking (minimum 8 matches)</b>		
- Weekdays	£23.00	S
- Weekends and Bank Holidays	£31.75	S
<b>Recreation Areas</b>	<b>2020/21</b>	<b>VAT Status</b>
Pavilion Hire (Cricket Pavilion, Dellwood Avenue, Felixstowe)	£72.50	S
Coronation Sports Ground Felixstowe		
- Use of changing facilities	£32.75	S
Tennis (Per court - Dellwood Avenue, Felixstowe)		
- Grass - Adult per hour	£12.50	S

## 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. Standard sites are those which have a hut immediately in front of them and obstructing the line of sight towards the sea.

Sizewell	2020/21	VAT Status
Premier site only	£605.00	S
Setting up of beach hut licence	£36.00	S
Administration fee for paying by instalments	£30.00	S

**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**

The beach huts at Lowestoft are managed by Sentinel Enterprises Ltd. 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)

<b>Felixstowe Huts</b>	<b>2020/21</b>	<b>VAT Status</b>
Setting up of beach hut licence	£639.00	S
Setting up of beach hut licence - transfer within family (must provide evidence)	£128.00	S
Administration fee for paying by instalments	£30.00	S
Premier site	£605.00	S
Premier surcharge (per sqm where the site exceeds 2.13m width x 2.43m depth)	£174.00	S
Standard site	£484.00	S
Standard surcharge (per sqm where the site exceeds 2.13m width x 2.43m depth)	£152.00	S
<b>Felixstowe Chalets</b>		
<b>Bath Tap</b>		
- Chalets 21 - 26 (6)	£1,636.00	S
- Chalets 5 - 8 (4)	£1,636.00	S
- Chalets 1 - 4, 9 - 20, 27 - 36 (26)	£2,109.00	S
<b>Cliff House</b>		
- Chalets 3 and 4	£772.00	S
- Chalets 1, 2 and 6 - 16 (13)	£1,147.00	S
- Chalet 17	£1,147.00	S
- Chalets 18 - 22 (5)	£1,636.00	S
- Chalets 23 - 25 (3)	£1,636.00	S
- Chalet 5	£1,636.00	S
- Chalets 26 - 41 (16)	£2,109.00	S
Administration fee for paying by instalments	£30.00	S
Setting up of chalet licence	£36.00	S

## OPERATIONS

### 3.9 Leisure Facilities

Brackenbury Leisure Centre, Deben Leisure Centre, Felixstowe Leisure Centre & Leiston Leisure Centre are managed by Places for People 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

Waterlane Leisure Centre and Bungay Leisure Centre are managed by Sentinel Leisure Trust. For more information see below contact details:

<a href="#">Waterlane Leisure Centre   Lowestoft</a>	01502 532540
<a href="#">Bungay Leisure Centre   Bungay</a>	01986 895014

## 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.

Interments (first and subsequent) for Purchased Graves	2020/21	VAT Status
Stillborn child or aged under 18 years	No Charge	OS
A person over age 18 (Aldeburgh, Leiston, Saxmundham and Woodbridge cemeteries):		
- Standard Depth	£781.00	OS
- Double Depth	£921.00	OS
- Treble Depth	£1,066.00	OS
A person over age 18 (Beccles, Bungay, Halesworth, Kirkley, Lowestoft, Southwold and Wrentham cemeteries):		
- Standard Depth	£634.00	OS
- Double Depth	£724.00	OS
- Treble Depth	£822.00	OS
For the interment of ashes in a grave or ashes plot	£234.50	OS
For the interment of two sets of ashes at the same time	£309.00	OS
For the scattering of ashes	£103.00	OS
For the interment of body parts to an existing grave	£187.50	OS

## OPERATIONS

### 3.10 Cemeteries (continued)

<b>Interments (first and subsequent) for Common Graves / Unmarked Graves</b>	<b>2020/21</b>	<b>VAT Status</b>
Stillborn child or aged under 18 years	No charge	OS
A person over age 18:		
- Standard Depth	£556.00	OS
- Double Depth	£648.50	OS
- Treble Depth	£823.50	OS
Cancellation of burial arrangements 48 hours prior to burial	50% of charge	OS
Cancellation of burial arrangements less the 48 hours prior to burial	100% of charge	OS
Exhumation:		
- Of a body	£1,112.00	S
- Of cremated remains	£450.00	S
<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
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
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
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



## OPERATIONS

### 3.10 Cemeteries (continued)

<b>Exclusive Right of Burial (Period of 25 years) - Excludes Common/Unpurchased graves</b>	<b>2020/21</b>	<b>VAT Status</b>
For exclusive right of burial in a children's plot 5' x 2' (1524mm x 609mm)	£458.00	OS
For exclusive right of burial in a children's plot 3' x 2' (914mm x 609mm)	£425.00	OS
- In an earthen grave space 9' x 4' (2743mm x 1219mm)	£224.00	OS
- In an earthen ashes plot 2' x 2' (609mm x 609mm)	£149.50	OS
<b>Monuments and Headstones (Memorials permitted on any section, including lawns)</b>		
Headstones, crosses etc. (maximum height of 36"/920mm)*	£230.00	S
Headstones, crosses etc. on children's graves and on ashes plots (maximum height 24"/609mm)*	£130.50	S
Headstones, crosses etc. on gardens of rest ashes plots (maximum height 24"/609mm) Aldeburgh, Leiston & Saxmundham only	£134.50	S
A plaque or desk (maximum height 6"/152mm)*	£134.50	S
A plaque on memorial wall 9" x 6" (229mm x 152mm)	£230.00	S
Flower vase with inscription (maximum height 11 3/4"/300mm)*	£102.50	S
For every additional inscription	£58.00	S
<b>Kerb Sets (Traditional Section only) - Excludes headstone fee</b>		
For single grave space:		
- A full kerb set (max length 83"/2100mm)*	£255.00	S
- A half kerb set (length between 19" and 42"/480mm and 1050mm)*	£134.50	S
- A small kerb set (maximum length 19"/480mm)*	£102.50	S

## OPERATIONS

### 3.10 Cemeteries (continued)

<b>Kerb Sets (traditional section only) - Excludes headstone fee</b>	<b>2020/21</b>	<b>VAT Status</b>
For double grave space:		
- A full kerb set (max length 83"/2100mm)*	£510.00	S
- A half kerb set (length between 19" and 42"/480mm and 1050mm)*	£311.00	S
- A small kerb set (maximum length 19"/480mm)*	£237.00	S
<b>All Areas</b>		
Memorial renovation/replacement/application	£48.00	S
<b>Other Charges</b>		
Use of cemetery chapel	£180.50	EX
Appointment with cemetery staff	£48.50	S
Cemetery staff locating and marking grave	£48.50	S
Staff search of burial records (per register)	£48.50	S
Personal search of burial records (per register)	£26.50	S
For a certified copy of entry in register or burials	£26.50	S
Statutory declaration relating to burial records	£112.50	OS
Updating grants of exclusive rights of burial	£37.50	S
Transfer of grant of right of burial	£64.50	OS

## OPERATIONS

### 3.11 Green Burials

Green Burial Site	2020/21	VAT Status
<b>Interments (first and subsequent) burial fees</b>		
Stillborn child or aged under 18 years	No charge	OS
A person over age 18 (single depth)	£540.00	OS
For the interment of ashes in a grave or ashes plot	£230.00	OS
For the interment of two sets of ashes at the same time	£300.00	OS
For the scattering of ashes	£103.00	OS
Provision of plaque on memorial board	£67.00	S

#### 4.1 Street Name & Numbering

Existing	2020/21	VAT Status
Property renaming/addition of house name	£39.00	OS
Provision of naming & numbering information to utilities	£368.00	OS
Naming & numbering enquiries from solicitors/utilities not subscribed - new or historic addresses	£78.00	OS
Re-numbering of scheme following development re-plan (after notification of approved naming and numbering scheme issued) either individuals or developers	£78.00	OS
<b>Addressing New Development</b>		
1 plot	£39.00	OS
2-5 plots (including new streets)	£78.00	OS
6-10 plots (including new streets)	£150.00	OS
11-20 plots (including new streets)	£300.00	OS
21-50 plots (including new streets)	£800.00	OS
51-100 plots (including new streets)	£1,200.00	OS
101+ plots (including new streets)	£1,200 base charge + £10 per plot	OS
<b>Provision/Relocation of Street Name Plates</b>		
Set of street nameplates (2) supplied and installed	£435.00	S
Re-locating street name plate	£150.00	S

### 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)

## 5.2 Events Area (continued)

## Small - Outdoor theatre, fundraising &amp; music events (under 500 attendees, per day)

	2020/21			
	Commercial	Charity (national)	Charity (local)	VAT Status
Application fee	£52.00	£52.00	£26.00	EX
Hire charge (per day)				
Felixstowe events area	£309.00	£155.00	No Charge	EX
Parks, promenade, gardens and village greens	£309.00	£155.00	No Charge	EX
Felixstowe Triangle	£103.00	£52.00	No Charge	EX
Promotional stands (per metre)	£10.00	£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.

## Medium - Circus, fun fair, music event, sports event &amp; open air cinema (500 - 2999 attendees, per day)

	2020/21			
	Commercial	Charity (national)	Charity (local)	VAT Status
Application fee	£52.00	£52.00	£26.00	EX
Hire charge (per day)				
Events area	£618.00	£309.00	No charge	EX
Parks, promenade, gardens and village greens	£618.00	£309.00	No charge	EX
Promotional stands (per metre)	£10.00	£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.

## ECONOMIC DEVELOPMENT & REGEN

**Large - Carnival, art on prom, historic car rally, commercial launches, commercial shows, sports event (over 3000 attendees, per day)**

	2020/21			
	Commercial	Charity (national)	Charity (local)	VAT Status
Application fee	£103.00	£103.00	£52.00	EX
Hire charge (per day)				
Events area	£1,029.00	£618.00	No charge	EX
Parks, promenade, gardens and village greens	£1,029.00	£618.00	No charge	EX
Promotional stands (per metre)	£10.00	£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.

## 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	2020/21	VAT Status
CIL Charging Schedule	Variable	OS
CIL Regulation 123 List	Variable	OS
CIL Instalments Policy	Variable	OS
CIL Discretionary Social Housing Relief Policy	Variable	OS

## 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	2020/21	VAT Status
Permitted development	£43.50	S
Householder	£43.50	S
<b>Residential</b>		
2-5 dwellings	£125.00 per dwelling	S
6-9 dwellings	£930.00	S
10-30 dwellings	£930.00 + £90.00 per dwelling	S
31-50 dwellings	£930.00 + £90.00 per dwelling	S
51-99 dwellings	£310.00 cost for initial meeting	S
100+ dwellings	£310.00 cost for initial meeting	S
<b>Commercial</b>		
1 - 40sq m	£186.50	S
41- 100sq m	£186.50	S
101 - 250sq m	£125.00 + £125.00 per 200m <sup>2</sup>	S
251 - 500sq m	£125.00 + £125.00 per 200m <sup>2</sup>	S
501 - 1,000sq m	£125.00 + £125.00 per 200m <sup>2</sup>	S
1,001 - 10,000sq m	£620.00 + £125.00 per 1000m <sup>2</sup>	S
10,001+ sq m (1Ha)	Negotiated charge	S

## PLANNING & COASTAL MANAGEMENT

### 6.2 Pre Application Planning Advice (continued)

Other	2020/21	VAT Status
Certificate of lawfulness	£93.00	S
Advertisements	£43.50	S
Telecommunications	see Commercial above	S
Listed buildings	£93.00	S
Change of use	£93.00	S
Shop fronts	£93.00	S
Tree inspection and hedgerow - Householders	£93.00	S
Tree inspection and hedgerow - All others	£240.00	S
Anemometer masts or single wind turbines of less than 100m:		
- Up to 20m	£93.00	S
- 20m to 50m	No Charge	S
- Above 50m	Negotiated	S

### 6.3 Public Path Orders & Agreements

Per Application	2020/21	VAT Status
Hourly charge	£59.00	OS

## PLANNING & COASTAL MANAGEMENT

### 6.4 Planning Policy & Delivery Maps

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. Charge of 20p per A4 sheet plus £1.50 for postage. Hard copies of Policies Maps are also available on request and will be charged as per the size of map as below (price includes £1.50 postage). It is usual for hard copies of any consultation documents produced to be free of charge to the public.

Map size	2020/21	VAT Status
A0	£9.50	ZE
A1	£5.50	ZE
A3	£2.50	ZE
A4	£1.70	ZE

### 6.5 Local Land Charges

Official Enquiries	2020/21	VAT Status
Full search	£150.00	OS
Full search additional parcel	£17.80	OS
LLC1	£26.00	OS
LLC1 register part	£7.60	OS
LLC1 additional parcel	£4.10	OS
Full CON29R	£124.00	S
Con 29 additional parcel	£13.70	S
Con 29 additional question	£22.60	S
Con 29 R individual questions (each)	£3.20	S
Con 29 optional enquiry	£21.10	S
Personal search	£21.20	OS
Solicitor fees for retrieval of documents	£21.10	OS

## HOUSING SERVICES

### 7.1 Houses of Multiple Occupancy Licences

	2020/21	VAT Status
Properties with up to and including five lettable units	£670.00	NB
Extra charge for each unit over five	£22.00	NB
Relicensing fee (after five years) if no structural changes etc. to premises	£133.00	NB
Varying a current licence if no structural changes etc. to premise	No Charge	NB

### 7.2 Enforcement Notices on Private Sector Landlords

	2020/21	VAT Status
Serving of enforcement notice	£485.00	NB

### 7.3 Immigration Issues

	2020/21	VAT Status
Cost of inspections	£360.00	NB

### 7.4 Park Home Fees

<b>New Licence (relevant protected sites only)</b>	2020/21	VAT Status
<b>Processing</b>		
Examine application documentation, associated certificates. Check to ensure that details are correct and correct fee is attached (60 mins)	£48.53	OS
Make assessment of site layout, provision of amenities/utilities, examine fire risk assessment (60 mins)	£48.53	OS
Finance receive payment of fee, process payment and issue receipt (60 mins)	£48.53	OS

## HOUSING SERVICES

### 7.4 Park Home Fees (continued)

<b>New Licence (relevant protected sites only) continued</b>	<b>2020/21</b>	<b>VAT Status</b>
<b>Inspection</b>		
1-5 Verification inspection of the site (60 mins)	£48.53	OS
6-24 Verification inspection of the site (90 mins)	£72.80	OS
25-99 Verification inspection of the site (120 mins)	£97.06	OS
100+ Verification inspection of the site (180 mins)	£145.59	OS
<b>Issue of New Licence</b>		
Prepare licence documents and certificates (120 mins)	£97.06	OS
Check and sign certs/licence as necessary, and serve by post (30 mins)	£24.27	OS
Update database register and public register (20 mins)	£16.16	OS
1-5 Combined adjusted total fees for new park home licence applications	£331.61	OS
6-24 Combined adjusted total fees for new park home licence applications	£355.88	OS
25-99 Combined adjusted total fees for new park home licence applications	£380.14	OS
100+ Combined adjusted total fees for new park home licence applications	£428.67	OS
<b>Annual Fee (relevant protected sites only)</b>		
1-3 Number of pitches	No Charge	OS
4-5 Number of pitches - (185 mins admin time) (140 mins inspection time)	£262.87	OS
6-24 Number of pitches - (200 mins admin time) (210 mins inspection time)	£331.63	OS
25-99 Number of pitches - (270 mins admin time) (390 mins inspection time)	£533.84	OS
100-199 Number of pitches - (375 mins admin time) (800 mins inspection time)	£950.38	OS
200+ Number of pitches - (450 mins admin time) (1080 mins inspection time)	£1,237.52	OS

## HOUSING SERVICES

### 7.4 Park home fees (continued)

Variations and Amendments	2020/21	VAT Status
License Variation (plus inspection fee if applicable)	£141.52	OS
Examine amended application documents and associated certificates. Check to ensure details are correct and correct fee is attached (60mins)	£48.53	OS
Check site history for any outstanding issues (30 mins)	£24.27	OS
Make decision as to whether amendments are appropriate (30 mins)	£24.27	OS
Prepare new licence documents (20 mins)	£16.16	OS
Check, sign and post new documents (15 mins)	£12.13	OS
Update database and public register (20 mins)	£16.16	OS
<b>Site Inspection Fees</b>		
1-5 Verification inspection of the site (60 mins)	£48.53	OS
6-24 Verification inspection of the site (90 mins)	£72.80	OS
25-99 Verification inspection of the site (120 mins)	£97.06	OS
100+ Verification inspection of the site (180 mins)	£145.59	OS
<b>Licence Transfer Fee</b>		
Transfer	£141.52	OS
Check form is correct including correct fee (30 mins)	£24.27	OS
Check site history and any outstanding issues (30 mins)	£24.27	OS
Examine request documentation and make decision (60 mins)	£48.53	OS
Prepare new licence documents (20 mins)	£16.16	OS
Check, sign and post new documents (15 mins)	£12.13	OS
Update database and public register (20 mins)	£16.16	OS
Deposit of site rules - examine rules, checking for banned rules (60 mins)	£48.53	OS
Deposit of site rules - update database and public register (20 mins)	£16.16	OS

## HOUSING SERVICES

### 7.5 Landlord Smoke Detectors

	2020/21	VAT Status
First offence	£590.00	OS
First offence (If paid within 14 day period from date of service)	£430.00	OS
Second offence	£2,500.00	OS
Third and subsequent offences	£5,000.00	OS

### 7.6 Enforcement Action (works in default)

	2020/21	VAT Status
Cost of works undertaken plus officer time costs	100% of costs plus £48.53 per hour	OS

### 7.7 Civil Penalties (Housing Act 2004)

	2020/21	VAT Status
Penalty (maximum)	£30,000.00	OS
<b>Actual penalty applied is calculated in accordance with the relevant policy</b>		

### 7.8 Minimum Energy Efficiency Standards

	2020/21	VAT Status
Substandard property let unlawfully for less than three months	£2,000.00	OS
Substandard property let unlawfully for more than three months	£4,000.00	OS
Failure to comply with compliance notice	£2,000.00	OS
Registering a false exemption	£1,000.00	OS

## HOUSING SERVICES

### 7.9 Assistance Service (renovation grants / disabled facilities grants)

	2020/21	VAT Status
Assistance with making an application for a Renovation Grant (over £5,000) - inc. tendering process and supervision of works	15% of eligible assistance package	S
Assistance with making an application for a Disabled Facilities Grant - inc. tendering process and supervision of works	15% of eligible assistance package	S
Assistance with making an application for a Minor Works Grant - inc. tendering process and supervision of works	15% of eligible assistance package	S
Assistance with completing an application for a Grant (any type) - not including tendering process or supervision of works	£145.00	S

### 7.10 Landlord References

	2020/21	VAT Status
Landlord reference	No Charge	OS

### 7.11 Garage Rents

With Effective From 1st April 2019	2020/21	VAT Status
HRA Tenants (per week based on a 50 week year) *	£8.00	OS
Private Tenants (per week based on a 50 week year and inclusive of 20% VAT) *	£11.40	S
<b>*2020/21 garage rents to be effective from 1st April 2020 proposed as part of the HRA budget report in January 2020</b>		

### 7.12 Mutual Exchange Fees

Application	2020/21	VAT Status
Electric safety check	£86.40	S
Gas safety check - boiler inspection	No Charge	OS



# Statutory Fees and Charges

## 2020/21

### East Suffolk Council



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## FEES AND CHARGES NOTE

### **Note**

Generally any increase in fees and charges will take effect from 1<sup>st</sup> April 2020 and apply through to 31<sup>st</sup> March 2021. 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	GM Controls Rice and Rice products from China
Catch certification under the IUU fishing controls	Organic Certificate verification
Radiation Controls Food and Feed from Japan	Ship Inspection Charges for Ship Sanitation Certificates
Gaur Gum from India	Water Sampling on vessels
Plastic Kitchenware from China and Hong Kong	High Risk
Other Charges	

The above categories set out above for current charges can be found on the Suffolk Coastal Port Health Authority website below.

<http://www.porthhealth.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	2020/21	VAT Status
A fixed fee will be charged for Ship Sanitation Inspections at the current rates agreed by the Association of Port Health Authorities.		
- Ships up to 1,000 gross tonnage	£95.00	OS
- Ships from 1,001 to 3,000 gross tonnage	£130.00	OS
- Ships from 3,001 to 10,000 gross tonnage	£200.00	OS
- Ships from 10,001 to 20,000 gross tonnage	£255.00	OS
- Ships from 20,001 to 30,000 gross tonnage	£330.00	OS
- Ships over 30,000 gross tonnage	£390.00	OS
With the exception of:		
* Vessels with the capacity to carry between 50 and 1,000 persons	£390.00	OS
* Vessels with the capacity to carry more than 1,000 persons	£665.00	OS
Extensions	£65.00	OS

\* 2020/21 APHA fees not published at time of drafting.

## ENVIRONMENTAL & PORT HEALTH

### 1.3 Local Authority Pollution Prevention & Control (LAPPC)

Environmental Permitting (England & Wales) Regulations 2010 (NAT F)	2020/21	VAT Status
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 2020 to March 2021, and we expect to be notified of the fees for 2020/21 in April 2020.

## ENVIRONMENTAL & PORT HEALTH

### 1.3 Local Authority Pollution Prevention & Control (LAPPC) (continued)

LAPPC Mobile Plant Charges		2020/21			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 instalments paid on 1st April, 1st July, 1st October and 1st January. Where fee is paid quarterly there is an additional fee of £36.00.

## ENVIRONMENTAL & PORT HEALTH

### 1.3 Local Authority Pollution Prevention & Control (LAPPC) (continued)

Annual Subsistence	2020/21			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>2020/21</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>		
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

## 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	2020/21	VAT Status
Commercial premises	£270.00	OS
Domestic premises (split between the number of properties on the supply)	£160.00	OS
Sampling of a private water supply:		
Investigation of a non compliance of a non supply	£50.00	OS
Analysing a sample of water under Regulation 10*	£50.00	OS
Analysing a sample of water taken during check monitoring*	£50.00	OS
Analysing a sample of water taken during audit monitoring*	£50.00	OS
<b>* plus full cost analysis</b>		

## 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 & 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.

		2020/21	
Non-Domestic Rateable Value		Initial Fee	VAT Status
Village halls, church halls and premises of a similar nature licensed only for the provision of regulated entertainment		No Charge	OS
Band A	£0 - £4,300	£100.00	OS
Band B	£4,301 - £33,000	£190.00	OS
Band C	£33,000 - £87,000	£315.00	OS
Band D	£87,001 - £125,000	£450.00	OS
Band E	£125,001 and over	£635.00	OS

License Fee	2020/21	VAT Status
Personal licences	£37.00	OS
Temporary event notices	£21.00	OS

## LEGAL & DEMOCRATIC SERVICES

### 2.1 Charges for Licences (continued)

#### 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	2020/21	VAT Status
		Additional Annual Fee	
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	2020/21	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
<b>Small Societies Lotteries</b>		
Initial registration fee	£40.00	OS
Renewal (annually)	£20.00	OS

	2020/21				
	Licensed Premises Gaming Machine Permit	Club Gaming / Club Machine Permit (each)	Family Entertainment Centre Gaming Machine Permit	Prize Gaming Permit	VAT Status
<b>Permits</b>					
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	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 Scrap Metal Dealers (Scrap Metal Dealers Act 2013)

Site Licence	2020/21	VAT Status
Assessment for a new licence	£395.00	OS
Assessment for variation of a licence	£161.00	OS
Assessment for a renewal	£303.00	OS
Collectors Licence		
Assessment for a new licence	£229.00	OS
Assessment for variation of a licence	£88.00	OS
Assessment for a renewal	£194.00	OS

### 2.3 Sale of Electoral Roll

	2020/21	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.

	2020/21	VAT Status
Copies of official documents (e.g. Planning and Building Regulations decision notice)	£10.50	S

		2020/21		
Latitude Global Maps		Urban Maps	Rural Maps	VAT Status
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				

	2020/21	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

	2020/21	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

	2020/21	VAT Status
Planning	£67.50	S
Building Control	£67.50	S

### 3.4 Section 106 monitoring Fees (Town & County Planning Act 1990)

	2020/21	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)

	2020/21	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>2020/21</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>2020/21</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>2020/21</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.

	2020/21	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

	2020/21	VAT Status
For 'householder' applications	£34.00	OS
For other applications	£116.00	OS

### 3.8 Extended Time Limits for Implementing Existing Planning Permissions

	2020/21	VAT Status
For 'householder' applications	£68.00	OS
Application for major development	£690.00	OS
For other applications	£234.00	OS

## 3.9 Non Material Amendments Following Grant of Planning Permission

	2019/20	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>2020/21</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.

	2020/21	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

	2020/21	VAT Status
Data Protection Act 1998 / General Data Protection Regulations	No Charge	OS
Housing Regulations 1989	No Charge	OS

## **CABINET**

Tuesday 7 January 2020

### **CAPITAL PROGRAMME FOR 2020/21 TO 2023/24 INCLUDING REVISIONS TO 2019/20**

#### **EXECUTIVE SUMMARY**

1. This report sets out the Council's Capital Programme for the financial years 2020/21 to 2023/24 including revisions to 2019/20.
2. The report includes the main principles applied to set the programme and provides details of the expenditure and financing for 2019/20 and 2020/21 to 2023/24.
3. Total General Fund Capital investment for the period is anticipated to be £152.612m. In addition to the use of its internal resources and both internal and external borrowing, the Council will be benefiting from receiving £94.546m of external grants and contributions.
4. Total Housing Revenue Account capital investment for the period is anticipated to be £59.077m and benefiting from receiving £8.977m of external grants and contributions.
5. The Committee is asked to review the Capital Programme for 2020/21 to 2023/24 including revisions to 2019/20 and recommend its approval.

Is the report Open or Exempt?

Open

**Wards Affected:**

All Wards across East Suffolk

**Cabinet Member:**

Councillor Steve Gallant  
Leader of the Council and Cabinet Member with responsibility for Resources  
  
Councillor Maurice Cook  
Assistant Cabinet Member for Resources

**Supporting Officer:**

Simon Taylor  
Chief Finance Officer and Section 151 Officer  
01394 444570  
[simon.taylor@eastssuffolk.gov.uk](mailto:simon.taylor@eastssuffolk.gov.uk)

## 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 2020/21 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 a successful track record of disposing 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 £48.851m has been assumed for the General Fund Capital Programme, being £25.651m (internal borrowing) and £23.200m (external borrowing).
- 1.8 The Council's external borrowing limit is set at £155m with a General Fund limit of £67.74m and actual borrowing of £6.24m. The HRA borrowing limit is set at £87.26m with actual borrowing of £71.17m.
- 1.9 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.

- 1.10 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.
- 1.11 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.
- 1.12 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.
- 1.13 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.
- 1.14 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 £82,800 (2019/20). The Council receives the sale proceeds of the Council House.
- 1.15 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.
- 1.16 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.
- 1.17 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 2019/20 to 2023/24.
- 2.2 The capital programme for 2019/20 through to 2023/24 has a total budget requirement of £152.612m which will be financed through both internal and external resources.
- 2.3 The programme from 2019/20 to 2023/24 benefits from £94.546m (62%) of external grants and contributions, the use of £9.145m (6%) of reserves and internal/external borrowing of £48.851m (32%).
- 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 2019/20 to 2023/24.
- 3.2 The capital programme for 2019/20 through to 2023/24 has a total budget requirement £59.077m which will be financed through both internal and external resources.

- 3.3 The programme from 2019/20 to 2023/24 relies upon £8.977m (15%) of external grants and contributions, the use of £27.671m (47%) of capital reserves and direct revenue financing of £22.429m (38%).

## **4 KEY INVESTMENTS**

### **Leisure Development Investments**

- 4.1 Prior to establishing East Suffolk Council, Suffolk Coastal DC had embarked into a five-year programme of redevelopment of the District's leisure centres. The work is part of the Council's commitment to improve our leisure centre offer and to encourage more people to become more active.
- 4.2 The work builds on the progress made by the [Leisure Strategy](#) formed in 2014, which sets out how improvements to the leisure provision will be made across the district, over the next ten years. The Leisure Strategy is currently being updated and due to be completed in early 2020. Deben Leisure Centre, the first of the redevelopments, commenced in September 2017 and reopened in the summer of 2018 after undergoing a £3.5 million refurbishment. Leiston Leisure Centre commenced in September 2018 and reopened in August 2019 after undergoing a £4 million refurbishment. Plans have been developed to address the Felixstowe, Brackenbury and Bungay Leisure Centres.
- 4.3 Felixstowe Regeneration
- 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.
- 4.4 Bungay Leisure Centre
- Bungay Leisure Centre is the third facility identified as a priority in the Leisure Redevelopment Programme, following Deben Leisure Centre (2018) and Leiston Leisure Centre (2019). The £3.4 million redevelopment has started, with the centre being closed on 12 September 2019 for a ten-month period
- 4.5 Lowestoft Beach Hut Replacement
- Options to replace approximately 50 beach huts which closed due to structural issues are being considered and will follow the cliff stabilisation works once they have been completed.

### **Commercial Investment**

- 4.6 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 to deliver the Council's Commercial Investment plans. Any proposed investment will be subject to a satisfactory business case and Cabinet approval.

### **Flood Alleviation**

- 4.7 Lowestoft Tidal 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.

### **HRA Redevelopment/ New Build Programme**

- 4.8 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.

- 4.9 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 Council's objective.

## 5 THE REVIEW PROCESS

- 5.1 Monitoring of the capital programme takes place on a quarterly basis, with all project managers required to provide an update on the current status of their projects. A summary of this information is reported to Cabinet, forming part of the Council's integrated quarterly performance monitoring.

## 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 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.
- 6.3 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.

	2019/20	2020/21	2021/22	2022/23	2023/24
General Fund - Capital Charges	£000	£000	£000	£000	£000
Interest	570	550	550	550	550
Borrowing repayment provision (MRP)	816	1,081	1,356	1,403	1,439
Total	<b>1,386</b>	<b>1,631</b>	<b>1,906</b>	<b>1,953</b>	<b>1,989</b>
HRA - Capital Charges					
Interest	<b>2,045</b>	<b>2,055</b>	<b>2,055</b>	<b>2,055</b>	<b>2,055</b>

## 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 OTHER KEY ISSUES

- 8.1 The report has been prepared having considered the results of an overall Equality Impact Assessment (EIA's). Individual EIA's will be included within the project business cases.

## 9 REASON FOR RECOMMENDATION

- 9.1 Approval of the capital programme for 2019/20 to 2023/24 is required as part of the overall setting of the budget and MTFS.

**RECOMMENDATIONS**

That the capital programme for 2020/21 to 2023/24 and revisions to 2019/20 be recommended for approval by Full Council.

**APPENDICES**

Appendix A	General Fund summary and detailed capital investment projects
Appendix B	Housing Revenue Account summary and detailed capital investment
Appendix C	Capital Programme External Funding Summary

**BACKGROUND PAPERS** – None

## APPENDIX A

SUMMARY - GENERAL FUND PROGRAMME	2019/20	2020/21	2021/22	2022/23	2023/24	2019/20 to 2023/24
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Total
<b>Capital Expenditure</b>						
Economic Development & Regeneration	830	0	0	0	0	830
Environmental Services & Port Health	50	11	30	0	0	91
Financial Services	5,380	5,300	600	0	0	11,280
ICT Services	670	400	50	50	50	1,220
Operations	11,056	19,611	11,370	1,405	6,725	50,167
Planning & Coastal Management	6,302	14,602	21,729	23,384	13,995	80,012
Housing Improvement	2,148	1,716	1,716	1,716	1,716	9,012
<b>Total Capital Expenditure</b>	<b>26,436</b>	<b>41,640</b>	<b>35,495</b>	<b>26,555</b>	<b>22,486</b>	<b>152,612</b>
<b>Financed By:-</b>						
<b>External:</b>						
Grants	9,150	15,440	23,245	25,000	21,461	94,296
Contributions	50	50	50	50	50	250
Borrowing	0	12,800	10,400	0	0	23,200
<b>Internal:</b>						
General Fund Capital Receipts	70	0	0	0	0	70
Borrowing	12,004	11,422	925	900	400	25,651
Reserves	5,162	1,928	875	605	575	9,145
<b>Total Financing</b>	<b>26,436</b>	<b>41,640</b>	<b>35,495</b>	<b>26,555</b>	<b>22,486</b>	<b>152,612</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	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Ness Point Regeneration Project	830	0	0	0	0	EG
<b>Total Budgeted Expenditure</b>	<b>830</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	IB
Capital Receipt	0	0	0	0	0	ICR
Reserve	0	0	0	0	0	IR
	0	0	0	0	0	
<b>External Funding:</b>						
Grants	830	0	0	0	0	EG
Contributions	0	0	0	0	0	EC
Borrowing	0	0	0	0	0	EB
	830	0	0	0	0	
<b>Total Budgeted Financing</b>	<b>830</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	2019/20	2020/21	2021/22	2022/23	2023/24	Funding
	£000	£000	£000	£000	£000	Type
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Port Health IT System	50	11	30	0	0	IR
<b>Total Budgeted Expenditure</b>	<b>50</b>	<b>11</b>	<b>30</b>	<b>0</b>	<b>0</b>	
<b>Financed By:-</b>						
<b>Internal Funding:</b>						
Internal Borrowing	0	0	0	0	0	IB
Capital Receipt	0	0	0	0	0	ICR
Capital Reserve - Port Health	50	11	30	0	0	IR
	<b>50</b>	<b>11</b>	<b>30</b>	<b>0</b>	<b>0</b>	
<b>External Funding:</b>						
Grants	0	0	0	0	0	EG
Contributions	0	0	0	0	0	EC
Borrowing	0	0	0	0	0	EB
	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	
	<b>50</b>	<b>11</b>	<b>30</b>	<b>0</b>	<b>0</b>	
<b>Project</b>	<b>Description</b>					

FINANCIAL SERVICES, CORPORATE PERFORMANCE & RISK MANAGEMENT	2019/20	2020/21	2021/22	2022/23	2023/24	Funding
	£000	£000	£000	£000	£000	Type
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
House Purchase - Blackstock	80	0	0	0	0	IR
Commercial Investment * subject to business case	2,500	2,500	0	0	0	IB
Investment Property Acquisition - Lake Lothing Lowestoft	0	0	0	0	0	EB
Land Acquisition Leiston* subject to business case	300	0	0	0	0	IR
Land Acquisition* subject to business case	2,500	2,500	0	0	0	IB
Post Office London Road North Lowestoft Redevelopment	0	300	300	0	0	EB/IR
Short Term Transit Site* subject to business case	0	0	300	0	0	EB
<b>Total Budgeted Expenditure</b>	<b>5,380</b>	<b>5,300</b>	<b>600</b>	<b>0</b>	<b>0</b>	
<b>Internal Funding:</b>						
Internal Borrowing	5,000	5,000	0	0	0	IB
Capital Receipt	0	0	0	0	0	ICR
Reserve	380	0	200	0	0	IR
	<b>5,380</b>	<b>5,000</b>	<b>200</b>	<b>0</b>	<b>0</b>	
<b>External Funding:</b>						
Grants	0	0	0	0	0	EG
Contributions	0	0	0	0	0	EC
Borrowing	0	300	400	0	0	EB
	<b>0</b>	<b>300</b>	<b>400</b>	<b>0</b>	<b>0</b>	
<b>Total Budgeted Financing</b>	<b>5,380</b>	<b>5,300</b>	<b>600</b>	<b>0</b>	<b>0</b>	
<b>Project</b>	<b>Description</b>					
House Purchase - Blackstock	Purchase of investment property					
Commercial Investment * subject to business case	Commercial Investment budget to be used for the purchase of properties/land subject					
Land Acquisition Leiston* subject to business case	Purchase of investment property					
Land Acquisition* subject to business case	Purchase of investment property					
Post Office London Road North Lowestoft Redevelopment	Redevelopment of the recently purchased vacant Post Office site in London Road North.					
Short Term Transit Site* subject to business case	Evaluation of Short Term Transit Sites					

ICT SERVICES	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Corporate IT Requirements	454	400	50	50	50	IR
Members Webcasting	191	0	0	0	0	IR
Riverside Conference Room TV's	25	0	0	0	0	IR
<b>Total Budgeted Expenditure</b>	<b>670</b>	<b>400</b>	<b>50</b>	<b>50</b>	<b>50</b>	
<b>Financed By:-</b>						
<b>Internal Funding:</b>						
Internal Borrowing	0	0	0	0	0	IB
Capital Receipt	0	0	0	0	0	ICR
Reserve	670	400	50	50	50	IR
	670	400	50	50	50	
<b>External Funding:</b>						
Grants	0	0	0	0	0	EG
Contributions	0	0	0	0	0	EC
Borrowing	0	0	0	0	0	EB
	0	0	0	0	0	
<b>Total Budgeted Financing</b>	<b>670</b>	<b>400</b>	<b>50</b>	<b>50</b>	<b>50</b>	
<b>Project</b>	<b>Description</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	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Bawdsey Quay	57	0	0	0	0	IR
Beccles Sports Ground	70	0	0	0	0	ICR
Brackenhurst Beach Hut replacement Handrailing	88	22	0	0	0	IR
Bungay LC redevelopment	2,061	1,839	0	0	0	IB
Cemeteries	395	0	0	0	0	IB
Dellwood Avenue Cricket Pavilion	15	0	0	0	0	IB
East Point Pavilion * subject to business case	0	1,500	0	0	0	EB
East Suffolk House - Reception	100	0	0	0	0	IR
Estates Management	571	200	200	200	200	IB
Felixstowe - Cliff Step Refurbishment	218	0	0	0	0	IB
Felixstowe Lighting	140	0	0	0	0	IB
Felixstowe Regeneration Project	1,000	10,000	10,000	0	0	EB/IR
Felixstowe Sea Front Shelters	125	0	0	0	0	IB
Felixstowe South - seafront work and Martello Cafe	1,750	0	0	0	0	IR/EC
Felixstowe Sports Hub	0	900	0	0	0	IR
Footway Lighting Works - Northern (cyclical replacement)	34	30	30	30	0	IR
Leisure Centre Brackenhurst	20	20	20	0	0	IR
Leisure Centre Deben	20	20	20	0	0	IR
Leisure Centre Leiston	1,557	35	25	0	0	IB
Lowestoft Beach Hut - demolition/wall stabilisation/replacement Beach Huts	37	2,500	0	0	0	IB
Lowestoft South Beach Public Conveniences/Changing Facilities	200	0	0	0	0	IB
Melton Riverside Car Park Lighting	40	0	0	0	0	IR
New Beach Hut Sites	500	500	500	500	0	IB
Northern Car Park Works	0	220	0	0	0	IB
Public Conveniences	460	0	0	0	0	IB
Public Conveniences review - Lowestoft	100	300	0	0	0	IB
Seafront Gardens Beach Hut Development	500	0	0	0	0	IB
Southwold Caravan Site redevelopment * subject to business case	0	1,000	0	0	0	EB
Southwold Harbour South Pier	0	0	50	150	6,000	EG
Station Road Car Park	272	0	0	0	0	IR
Waveney Norse Grounds Equipment	25	25	25	25	25	IR
Waveney Norse Vehicles	656	500	500	500	500	IR
Wickham Market Churchyard Boundary Wall	45	0	0	0	0	IB
<b>Total Budgeted Expenditure</b>	<b>11,056</b>	<b>19,611</b>	<b>11,370</b>	<b>1,405</b>	<b>6,725</b>	
<b>Internal Funding:</b>						
Internal Borrowing	6,924	5,594	725	700	200	IB
Capital Receipt	70	0	0	0	0	ICR
Reserve	4,062	1,517	595	555	525	IR
	11,056	7,111	1,320	1,255	725	
<b>External Funding:</b>						
Grants	0	0	50	150	6,000	EG
Contributions	0	0	0	0	0	EC
Borrowing	0	12,500	10,000	0	0	EB
	0	12,500	10,050	150	6,000	
<b>Total Budgeted Financing</b>	<b>11,056</b>	<b>19,611</b>	<b>11,370</b>	<b>1,405</b>	<b>6,725</b>	

Project	
Bawdsey Quay	Capital costs of the sewage system, clearance of car park and signage
Beccles Sports Ground	Refurbishment of Beccles Sports Ground Changing Rooms
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.
Dellwood Avenue Cricket Pavilion	Demolition of Pavilion
East Point Pavilion * subject to business case	Potential redevelopment opportunity through refurbishment and partial redevelopment
East Suffolk House - Reception	Redevelopment of the reception area at East Suffolk House
Estates Management	A planned preventative maintenance list of works required on Council owned properties
Felixstowe - Cliff Step Refurbishment	Project terminated
Felixstowe Lighting	Cyclical replacement of footway lighting
Felixstowe Regeneration Project	The Brackenbury and Felixstowe Leisure Centres are in need of considerable investment. A regeneration project for this area will follow consultation with the relevant partners.
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
Footway Lighting - Southern (Cyclical replacement)	Cyclical replacement of footway lighting
Footway Lighting Works - Northern (cyclical replacement)	Cyclical replacement of footway lighting
Leisure Centre Brackenbury	Planned preventative maintenance works required to ensure the immediate running of
Leisure Centre Deben	Planned preventative maintenance works required to ensure the immediate running of
Leisure Centre Leiston	Leiston is the second of the leisure redevelopment programme. The Leiston
Lowestoft Beach Hut - demolition/wall	Stabilisation of Cliff face and replacement of concrete beach huts
Lowestoft South Beach Public Conveniences/Changing Facilities	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
Northern Car Park Works	Planned preventative maintenance works
Public Conveniences	Planned enhancement works to District wide Public Conveniences
Public Conveniences review - Lowestoft	Enhancement of Gordon Road Public Convenience and review of remaining Public Conveniences in Lowestoft
Redevelopment of Hotson Road Tennis Courts	Project terminated
Seafront Gardens Beach Hut Development	Development of Seafront Gardens site for new beach huts
Southwold Caravan Site redevelopment * subject to	Refurbishment of existing caravan site
Southwold Harbour South Pier	
Station Road Car Park	Installation of lighting
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	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Bawdsey East Lane SMP Review	25	10	0	0	0	EG
Coast Protection - Minor Capital Works	80	828	200	200	200	IB
Corton & North Corton Hybrid Scheme	150	250	12,000	12,000	0	EG
Lowestoft Flood Risk Management Project Phase 1 (Tidal	4,312	9,472	4,963	0	0	EG
Lowestoft Flood Risk Management Project Phase 2 (Tidal	1,670	3,902	4,016	11,134	13,745	EG
S106 Play Equipment	50	50	50	50	50	EC
Slaughden Coast/Estuary SMP Policy review	15	20	0	0	0	EG
Thorpeness (Externally Funded)	0	70	500	0	0	EG
<b>Total Budgeted Expenditure</b>	<b>6,302</b>	<b>14,602</b>	<b>21,729</b>	<b>23,384</b>	<b>13,995</b>	
<b>Internal Funding:</b>						
Internal Borrowing	80	828	200	200	200	IB
Capital Receipt	0	0	0	0	0	ICR
Reserve	0	0	0	0	0	IR
	80	828	200	200	200	
<b>External Funding:</b>						
Grants	6,172	13,724	21,479	23,134	13,745	EG
Contributions	50	50	50	50	50	EC
Borrowing	0	0	0	0	0	EB
	6,222	13,774	21,529	23,184	13,795	
<b>Total Budgeted Financing</b>	<b>6,302</b>	<b>14,602</b>	<b>21,729</b>	<b>23,384</b>	<b>13,995</b>	
<b>Project</b>	<b>Description</b>					
Bawdsey East Lane SMP Review	Review of the Bawdsey Shoreline Management Plan					
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					
S106 Play Equipment	Play Equipment installation on play parks in the north of the district funded from S106 contributions					
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.					
Thorpeness (Externally Funded)	Strengthen the soft bag defences installed here in 2010/12 that were damaged by unusually high erosion pressure in 2013.					

GENERAL FUND HOUSING IMPROVEMENT	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Original Budget	Original Budget	Original Budget	Original Budget	
Orbit HIA Disabled Facilities Grant	2,148	1,716	1,716	1,716	1,716	EG
Total Budgeted Expenditure	2,148	1,716	1,716	1,716	1,716	
Financed By :-						
Internal Funding:						
Internal Borrowing	0	0	0	0	0	IB
Capital Receipt	0	0	0	0	0	ICR
Reserve	0	0	0	0	0	IR
	0	0	0	0	0	
External Funding:						
Grant	2,148	1,716	1,716	1,716	1,716	EG
Contributions	0	0	0	0	0	EC
Borrowing	0	0	0	0	0	EB
	2,148	1,716	1,716	1,716	1,716	
Project						
Orbit HIA Disabled Facilities Grant	Grant expenditure on disabled adaptions					
Total Capital Budget	26,436	41,640	35,495	26,555	22,486	

## APPENDIX B

SUMMARY – HOUSING PROGRAMME	2019/20	2020/21	2021/22	2022/23	2023/24	2019/20 to
	£000	£000	£000	£000	£000	2023/24
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Total
<b>Capital Expenditure</b>						
Housing Repairs	2,736	2,865	2,415	2,535	2,535	13,086
Housing Project Development	1,603	3,967	2,450	1,650	1,650	11,320
New Build Programme	2,252	8,593	7,826	8,000	8,000	34,671
<b>Total Capital Expenditure</b>	<b>6,591</b>	<b>15,425</b>	<b>12,691</b>	<b>12,185</b>	<b>12,185</b>	<b>59,077</b>
<b>Financed By:-</b>						
<b>External</b>						
Grant	218	1,743	960	3,028	3,028	8,977
Contributions	0	0	0	0	0	0
<b>Internal:</b>						
-HRA Direct Revenue Financing	2,278	5,410	5,497	4,622	4,622	22,429
-HRA Reserves	4,095	8,272	6,234	4,535	4,535	27,671
-HRA Capital Receipts	0	0	0	0	0	0
<b>Total Financing</b>	<b>6,591</b>	<b>15,425</b>	<b>12,691</b>	<b>12,185</b>	<b>12,185</b>	<b>59,077</b>
<b>Cumulative Expenditure to be financed by Housing Revenue Account</b>	<b>2,278</b>	<b>7,688</b>	<b>13,185</b>	<b>17,807</b>	<b>22,429</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	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Bathrooms	60	60	60	60	60	IR
Central Heating/Boilers	570	570	580	600	600	IR
Disabled Works	220	220	220	220	220	IR
Door Entry System - Park Road & The Hemplands	0	80	0	0	0	IR
Energy Efficiencies Work	200	200	200	200	200	IR
Environmental Works	10	10	10	10	10	IR
External Doors	20	20	20	20	20	IR
Fascia's	4	0	0	0	0	IR
Fire Door Replacement - All Schemes	20	0	0	0	0	IR
Garage Demolition	98	0	0	0	0	IR
Heat Metering	10	100	0	0	0	IR
Housing Repair Vans	110	110	110	210	210	IR
Kitchens	500	500	500	500	500	IR
Re-Roofing	350	430	450	450	450	IR
Rewiring	230	230	250	250	250	IR
St Peters Court - Fire Assessment	30	70	0	0	0	IR
St Peters Court - Lift	0	250	0	0	0	IR
St Peters Court - Openreach Rewiring	51	0	0	0	0	IR
St Peters Court - Sprinkler system	187	0	0	0	0	IR
St Peters Court - Water Tank	51	0	0	0	0	IR
Windows	15	15	15	15	15	IR
<b>Total Budgeted Expenditure</b>	<b>2,736</b>	<b>2,865</b>	<b>2,415</b>	<b>2,535</b>	<b>2,535</b>	
<b>Financed By:-</b>						
<b>Internal Funding:</b>						
Housing Revenue Account	0	0	0	0	0	IHRA
Housing Revenue Account Reserves	2,736	2,865	2,415	2,535	2,535	IR
Housing Capital Receipts	0	0	0	0	0	ICR
	2,736	2,865	2,415	2,535	2,535	
<b>External Funding:</b>						
Grants	0	0	0	0	0	
Contributions	0	0	0	0	0	
	0	0	0	0	0	
<b>Total Budgeted Financing</b>	<b>2,736</b>	<b>2,865</b>	<b>2,415</b>	<b>2,535</b>	<b>2,535</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 of full heating systems to the housing stock.					
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					
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.					
Fascia's	A rolling programme provides replacement fascia's to the housing stock.					
Fire Door Replacement - All Schemes	Reolacement of Fire Doors					
Garage Demolition	Demoliton of garages and construction of parking area					
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.					
Re-Wiring	Rewiring to the housing stock.					
St Peters Court - Fire Assessment	Fire Assesment 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 - Sprinkler System	Installation of sprinkler system					
St Peters Court - Water Tank	Water Tank installation					
Windows	A rolling programme provides replacement windows to the housing stock.					



HOUSING PROJECT DEVELOPMENT	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
Digital Transformation	0	0	0	0	0	IHRA/IR
Mobility Scooter Parking	46	0	0	0	0	IHRA/IR
Office Accommodation	0	500	500	0	0	IHRA/IR
Redevelopment Programme	1,557	3,467	1,950	1,650	1,650	IHRA/IR/EG
<b>Total Budgeted Expenditure</b>	<b>1,603</b>	<b>3,967</b>	<b>2,450</b>	<b>1,650</b>	<b>1,650</b>	
<b>Financed By :-</b>						
<b>Internal Funding:</b>						
Housing Revenue Account	686	2,392	1,105	350	350	IHRA
Housing Revenue Account Reserves	917	1,575	1,285	1,300	1,300	IR
Housing Capital Receipts	0	0	0	0	0	ICR
	1,603	3,967	2,390	1,650	1,650	
<b>External Funding:</b>						
Grant	0	0	60	0	0	EG
Contributions	0	0	0	0	0	EC
	0	0	60	0	0	
<b>Total Budgeted Financing</b>	<b>1,603</b>	<b>3,967</b>	<b>2,450</b>	<b>1,650</b>	<b>1,650</b>	
<b>Project</b>						
Digital Transformation	Smarter working practices being considered such as mobile working.					
Mobility Scooter Parking	Provision of Mobility Scooter Parking					
Office Accommodation	Provided for alternative depot office accommodation.					
Redevelopment Programme	Redevelopment programme for purchased accommodation					

NEW BUILD PROGRAMME	2019/20	2020/21	2021/22	2022/23	2023/24	Funding Type
	£000	£000	£000	£000	£000	
	Revised Budget	Revised Budget	Revised Budget	Revised Budget	Revised Budget	
New builds	2,252	8,593	7,826	8,000	8,000	IHRA/IR/EG
<b>Total Budgeted Expenditure</b>	<b>2,252</b>	<b>8,593</b>	<b>7,826</b>	<b>8,000</b>	<b>8,000</b>	<b>0</b>
<b>Financed By :-</b>						
<b>Internal Funding:</b>						
Housing Revenue Account	1,592	3,018	4,392	4,272	4,272	IHRA
Housing Revenue Account Reserves	442	3,832	2,534	700	700	IR
Housing Capital Receipts	0	0	0	0	0	ICR
	2,034	6,850	6,926	4,972	4,972	
<b>External Funding:</b>						
Grant	218	1,743	900	3,028	3,028	EG
Contributions	0	0	0	0	0	EC
	218	1,743	900	3,028	3,028	
<b>Total Budgeted Financing</b>	<b>2,252</b>	<b>8,593</b>	<b>7,826</b>	<b>8,000</b>	<b>8,000</b>	
<b>Project</b>						
New Builds	Provision of new housing					

<b>Total Capital Budget</b>	<b>6,591</b>	<b>15,425</b>	<b>12,691</b>	<b>12,185</b>	<b>12,185</b>
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## APPENDIX C

### Capital Programme External Funding Summary

Capital Projects 2019/20 to 2023/24	Total Project Cost	External Grant/Contribution	Net cost to East Suffolk
	£000	£000	£000
<b>General Fund</b>			
Bawdsey East Lane SMP Review	35	-35	0
Corton & North Corton Hybrid Scheme	24,400	-24,400	0
Felixstowe South - seafront work and Martello Cafe	1,750	-299	1,451
Lowestoft Flood Risk Management Project Phase 1 (Tidal Walls, Pluvial & Fluvial)	18,747	-18,747	0
Lowestoft Flood Risk Management Project Phase 2 (Tidal Gate)	34,467	-34,467	0
Lowestoft Former Post Office redevelopment	600	-400	200
Ness Point Regeneration Project	830	-830	0
Orbit HIA Disabled Facilities Grant	9,012	-9,012	0
S106 Play Equipment	250	-250	0
Slaughden Coast/Estuary	35	-35	0
Southwold Harbour & South Pier	6,200	-6,200	0
Thorpeness (Externally Funded)	570	-570	0
	<b>96,896</b>	<b>-95,245</b>	<b>1,651</b>
<b>Housing Revenue Account</b>			
Housing Redevelopment Programme	10,274	-60	10,214
New Build Programme	34,671	-8,917	25,754
	<b>44,945</b>	<b>-8,977</b>	<b>35,968</b>



## CABINET

Tuesday 7 January 2020

### HOUSING REVENUE ACCOUNT BUDGET REPORT 2020/21

#### EXECUTIVE SUMMARY

1. Under the Self-Financing regime, the future resources and spend of the Housing Revenue Account (HRA) are based on local decisions. This report outlines the HRA Income and Expenditure Budgets for the financial years 2020/21 to 2023/24 and notes the forecast position for 2019/20. In addition to this, a summary of its reserves and balances is included. The HRA budgets are fully funded from existing HRA funds to meet the Council's HRA spending plans. This includes the capital investment programme and reserve balances as per the HRA Financial Business Plan. Currently there is no requirement for any additional borrowing.
2. Since 1<sup>st</sup> April 2016, the Welfare Reform and Work Act 2016 has required social landlords to reduce their rents by 1% each year for four years ('the social rent reduction'). In October 2017, the Government announced that at the end of the four-year rent reduction, there would be a return to annual rent increases of up to the Consumer Price Index (CPI) plus 1% for at least five years. This would be implemented through the Rent Standard set by the Regulator of Social Housing rather than through legislation. On 26<sup>th</sup> February 2019 the Secretary of State for Housing, Communities and Local Government published a 'Direction to the Regulator' to set a Rent Standard that will apply from 1<sup>st</sup> April 2020. Alongside this Direction, the Government also issued a policy statement on rents for social housing (the Policy Statement) and the Regulator is required to have regard to this when setting its Rent Standard. For the first time, the Government has directed the Regulator to apply its Rent Standard to all registered providers of social housing, including local authorities. Details of the Policy Statement and Rent Standard from 2020 are provided in this report.
3. This report provides an opportunity for Cabinet to submit any comments to Full Council on the proposed 2020/21 budget for the HRA. Cabinet are asked to consider and make recommendations to Full Council regarding the:
  - HRA budget for 2020/21, and the indicative figures for 2021/22 to 2023/24;
  - Forecast outturn position for 2019/20 for noting;
  - Movements in HRA Reserves and Balances;
  - Average weekly rent for 2020/21 of £84.95 over a 50-week collection year (£83.05 2019/20), an average weekly increase of £1.90 or 2.3%;
  - Service charges and associated fees for 2020/21;
  - The new Rent Standard with effective from 1<sup>st</sup> April 2020 for noting; and

- Changes affecting public and private sector housing and welfare also to be noted.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All Wards within the District
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<b>Cabinet Member:</b>	<p>Councillor Steve Gallant Leader of the Council and Cabinet Member with responsibility for Resources</p> <p>Councillor Richard Kerry Cabinet Member with responsibility for Housing</p> <p>Councillor Maurice Cook Assistant Cabinet Member for Resources</p>
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<b>Supporting Officer:</b>	<p>Simon Taylor Chief Finance Officer and Section 151 Officer (01394) 444570 <a href="mailto:simon.taylor@eastsuffolk.gov.uk">simon.taylor@eastsuffolk.gov.uk</a></p> <p>Amber Welham Senior Accountant (01502) 523662 <a href="mailto:amber.welham@eastsuffolk.gov.uk">amber.welham@eastsuffolk.gov.uk</a></p>
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## **1 INTRODUCTION**

- 1.1 The Housing Revenue Account (HRA) reflects the statutory requirement under Section 74 of the Local Government and Housing Act 1989 to account separately for Local Authority housing provision. It is a ring-fenced account, containing solely the costs arising from the provision and management of the Council's housing stock, offset by tenant rents, service charges and other income. The Council has a statutory responsibility to set a balanced HRA budget (i.e. all budgeted expenditure must be matched by income).
- 1.2 The Welfare Reform and Work Act 2016 and the Housing and Planning Act 2016 made specific and significant provision for changes to the law affecting social housing providers with effect from April 2016. These changes included the statutory reduction of rents by 1% each year for four years, with 2019/20 being the final year of those reductions for the Council.
- 1.3 In February 2019 the Government set out a new policy statement for rents on social housing (the Policy Statement) effective from 1<sup>st</sup> April 2020. This will be implemented through the Regulator for Social Housing rather than through legislation. The Government published a 'Direction to the Regulator' to set a Rent Standard, and the Regulator is required to have regard to this when setting its Rent Standard. For the first time, the Government has directed the Regulator to apply its Rent Standard to all registered providers, including local authorities. Further detail on the 2020 Rent Standard is covered in Section 6 of this report.
- 1.4 The new rent policy will permit the Council to increase its rents for at least five years by up to the Consumer Price Index (CPI) plus 1%. Since 2001, social rents have been set based on a formula set by the Government and the new policy follows a similar process with the formulas set out in the Policy Statement.
- 1.5 In 2011, affordable rents were introduced and set at up to 80% of the market rent (inclusive of service charges), and from April 2015 the Government allowed social landlords to charge a full market rent where a social tenant has an annual household income of at least £60,000. This change allowed landlords to make better use of their social housing for properties rented to households with relatively high incomes.

## **2 KEY ISSUES AND CONSIDERATIONS**

### **2020 Rent Standard**

- 2.1 As referred to in Section 1.3 above, the Government's new policy statement for rents on social housing will be effective from 1<sup>st</sup> April 2020 and will be implemented through the 2020 Rent Standard. The new rent policy aims to strike a balance between the interests of existing social housing tenants who pay some or all of their own rent, the need to build more homes, and the importance of ensuring that providers of social housing have sufficient income to manage and maintain their housing stock.
- 2.2 The last significant change to rent setting was the 'social rent reduction' which came into effect in April 2016. This required social landlords to reduce their rents by 1% each year for four years. This reduction to rents had a significant impact on the HRA Financial Business Plan. Whilst the impact was contained within the existing parameters of the HRA, it resulted in reduced funds available to invest in the new housing development and redevelopment programme.
- 2.3 After four years of rent reduction, the new rent policy is welcomed. A five-year rent deal provides some stability to the Council in terms of its rental income stream, enabling the

Council to plan for its Housing Development Programme for the delivery of additional social housing properties.

### **Actuarial Valuation**

- 2.4 The latest triennial actuarial valuation of the assets and liabilities of the Suffolk County Pension Fund was completed on 31<sup>st</sup> March 2019. The Council is awaiting the actuarial report but has been advised that its share of the pension fund was 98% fully funded at this date. The proposed employers pension contribution rate for 2020/21, 2021/22 and 2022/23 is 34%, 33% and 32% and is a reduction on the current rate for East Suffolk of 35.4%. The current rate is based on a Primary Rate of 22.8%, plus a deficit payment of £2.6m at 12.6%. The HRA share of the deficit payment is currently in the region of £600,000. As a result of the proposed reduction to the employer's pension contribution rate for the next three years, this will generate an average annual saving to the HRA of £180,000.

### **Right to Buy Scheme**

- 2.5 As at 6<sup>th</sup> April 2019 the maximum discount available to Right to Buys (RTB's) is 70% or £82,800 (£110,500 in London Boroughs), whichever is lower. This figure increases each year in line with inflation. In 2012, the Council entered into an agreement with the Secretary of state to retain a share of its RTB receipts to reinvest in the provision of new affordable homes. The receipts used can only fund up to 30% of any investment into new affordable housing and must be spent within three years of receiving them.
- 2.6 From April 2012 the number of properties sold through the RTB scheme has steadily increased. In 2012/13 only nine properties were sold through the scheme, compared to 22 in 2018/19. Future year estimates are 30 per annum and is built into the HRA Financial Business Plan.
- 2.7 The implications of RTB sales is a reduction in dwelling rents received. The annual income lost through RTB sales in 2018/19 is £99,000, adding to the importance of increasing the HRA housing stock. RTB sales are considered when setting the dwelling income budgets.

## **3 WELFARE REFORM**

- 3.1 The Welfare Reform Act 2012 introduced major changes to the way people receive Housing Benefit and other welfare benefits which present new risks to HRA income collection from tenants.

### **Universal Credit**

- 3.2 The Welfare Reform Act 2012 introduced Universal Credit. This is to replace most existing working-age benefits with a single payment made directly to the claimant. Under Universal Credit there is a limit to the total amount of benefit a household can claim. As a result of this change there is a high risk that income previously guaranteed to the HRA may now not be collected.
- 3.3 Universal Credit is a single payment for working age people who are looking for work or on a low income. It replaces Housing Benefit, Working Tax Credit, Child Tax Credit, Income Support, Income based Jobseekers Allowance and Income related Employment and Support Allowance. It has been rolled out across the country and was introduced in the district in March 2015. The introduction initially only applied to people who were single and who would have previously applied for Jobseekers Allowance.

- 3.4 All postcodes within the East Suffolk area are now covered by Universal Credit Full Service.
- 3.5 Universal Credit has given cause for concern with landlords nationally. Landlords, including local authorities who were once guaranteed income, must now rely on claimants to make payments. Measures (see section 3.13 and 3.14) are being implemented to monitor and improve the effects of Universal Credit.
- 3.6 From April 2018, claimants wait time have reduced from six weeks to five weeks. If they are already receiving Housing Benefits, they will continue to receive this for the first two weeks of the claim process. This should help reduce pressure on tenants, and potentially have a positive impact on future rent arrears.

### **Under-Occupation Charge**

- 3.7 The criteria under the Welfare Reform Act mean that any working-age household deemed to be under-occupying their home receives a cut in their Housing Benefit (or Universal Credit). The cut is a fixed percentage of the Housing Benefit-eligible rent. This is known colloquially as the 'Bedroom Tax'.
- 3.8 Government has set this at a 14% cut for one extra bedroom and a 25% cut for two or more extra bedrooms. In essence this means, for every £100 charged for rent, tenants will need to contribute £14 or £25 per week from their own resources. To help alleviate the pressure of this penalty, the Council's HRA offers the incentive of 'Cash-for-Moving'. This is a widely used scheme across councils to encourage tenants to downsize. Tenants can bid for a smaller property on Gateway to Home-Choice, and if successful the tenant could receive up to £2,000 depending on the number of bedrooms given up. The scheme was in place before welfare reform to encourage better use of the housing stock.

### **Rent Arrears**

- 3.9 In addition to the loss of rental income, there is growing concern regarding rent arrears. In 2015 the total Benefit Cap was reduced from £26,000 to £20,000 (outside of London). This combined with the roll out of Universal Credit, the under-occupancy charge, and other general factors relating to the economy, has increased the risk of rent not being collected.
- 3.10 Rent arrears as at 27<sup>th</sup> November 2019 totalled £1,286,890.17 with prepayments of £490,071.76, giving a net arrears position of £796,818.41. This is the first year since 2015/16 where an improvement can be seen compared to the same point in time in the previous year. At the same point in time in 2018/19, rent arrears stood at £1,260,612.52 with prepayments of £412,561.52, giving a net arrears position of £848,050.76.
- 3.11 There has been a shift in the arrears. Any increases in arrears are between 1 and 12 weeks old. These will be directly linked to new Universal Credit claims which, if applied for correctly, should take five weeks to be received. Therefore, these are managed arrears and are a timing difference, rather than a true arrear.
- 3.12 To reduce the risk of arrears, new tenants are now asked to pay rent in advance. The amount they pay is linked to how regularly they pay their rent e.g. if a tenant pays weekly, they will be required to pay one week in advance.
- 3.13 Predictive analytics software was implemented at the end of 2018/19 for current tenant arrears. This has been successful in reducing the number of cases rent officers look at each week, allowing them to get through their case load and contact the tenants whose accounts require action. This in turn has led to a reduction on current tenant arrears at the end of both Quarter One and Quarter Two of this financial year from the same point in the previous financial year. With the current climate of full UC, it is nationally recognised that standing still

in terms of arrears is the new upper quartile position, so to have achieved small reductions is an extremely positive step. Due to its positive impact, the former tenant arrears module has now been purchased and is currently being tested to address the high level of arrears in this area.

- 3.14 There is still much work to do in both areas, the tenant's portal and text messaging service are currently in test which will allow tenants to have 24-hour digital access to their rent account and will enable texting for automated balances or request contact from their Rent Officer. Tracing software is currently being explored as well as applying for money judgement orders for Former Tenant Arrears which will allow the Council to find and take action against those tenants who leave with a debt.

#### **4 SELF-FINANCING ARRANGEMENT**

- 4.1 The Self-Financing regime was introduced in April 2012. The Council had to take on a significant amount of debt (£68 million) in exchange for not paying future Housing Subsidy. This change is anticipated to be beneficial to the HRA over the long-term. It also means the future resources and spend of the HRA are now based on local decisions.
- 4.2 A 30-year financial business model is used to support the delivery of the HRA under the Self-Financing regime. It makes assumptions regarding the level of income available and the key risks facing the housing service delivery within this timeframe. It programmes in the years the Council expects to pay back the current borrowing, whilst delivering the needs of the service.
- 4.3 The HRA funds the costs of borrowing for the initial debt settlement. The Council has chosen to incorporate this debt into the Council's overall borrowing portfolio, creating a single pool and charging interest to the HRA in proportion to the debt it holds.
- 4.4 Self-Financing must not jeopardise the Government's priority to bring borrowing under control. It gives Council landlords direct control over a very large rental income stream, so borrowing financed from this income must be affordable within national fiscal policies as well as locally. Therefore, a limit was placed on the total housing debt that each local authority could support from its HRA. Waveney's HRA limit or 'borrowing cap' was placed at £87.26 million.
- 4.5 On 3<sup>rd</sup> October 2018, it was announced by Central Government that the HRA borrowing cap was to be 'scrapped'. It was officially removed on 30<sup>th</sup> October 2018 by Central Government issuing a determination revoking previous determinations that specified a local authority's limits on indebtedness. Nationally, the borrowing cap was tight in comparison to the value of the housing stocks local authorities hold, e.g. the Council's HRA housing stock has a market value of £536 million as at 31<sup>st</sup> March 2019, compared to a borrowing cap of £87.26 million.
- 4.6 As at 1<sup>st</sup> April 2019 the total debt for the Council's HRA was £76 million (£68 million from the Self-Financing settlement and £8 million pre-Self-Financing). During 2019/20 a further £4.8 million has been repaid on the Pre-Self-Financing debt, reducing the total debt for the HRA to £71.2 million. The HRA spending plans, including its capital investment programme, are currently fully funded from existing resources. Therefore, there is currently no need to make use of any additional borrowing.
- 4.7 Under Self-Financing, local authorities now have the opportunity with greater certainty to adopt a more strategic, long term approach to ensure that housing needs are met, that the housing stock is maintained, and where possible additional homes are provided. The Council has used this strategic approach to introduce the Housing Development and Redevelopment Programme.



## 5 HRA 2020/21 TO 2023/24 BUDGETS

- 5.1 The following table summarises the 2020/21 budget through to 2023/24. With a forecasted position for 2019/20. A brief description to each heading can be found in **Appendix A**.

	2019/20 Original £000	2019/20 Forecast £000	2019/20 Movement £000	2020/21 Budget £000	2021/22 Budget £000	2022/23 Budget £000	2023/24 Budget £000
<b>Income</b>							
Dwelling Rent	(18,765)	(18,703)	62	(19,157)	(19,540)	(19,988)	(20,445)
Non-Dwelling Rent	(181)	(163)	18	(175)	(178)	(181)	(184)
Service & Other Charges	(1,208)	(1,217)	(9)	(1,239)	(1,250)	(1,260)	(1,271)
Leaseholders Charges for Services	(10)	(10)	-	(10)	(10)	(10)	(10)
Contribution towards Expenditure	(33)	(69)	(36)	(34)	(34)	(34)	(34)
Reimbursement of Costs	(270)	(279)	(9)	(285)	(284)	(284)	(284)
Interest Income	(96)	(140)	(44)	(106)	(111)	(121)	(134)
<b>Total Income</b>	<b>(20,563)</b>	<b>(20,581)</b>	<b>(18)</b>	<b>(21,006)</b>	<b>(21,407)</b>	<b>(21,878)</b>	<b>(22,362)</b>
<b>10% of total income</b>	<b>(2,056)</b>	<b>(2,058)</b>	<b>(2)</b>	<b>(2,101)</b>	<b>(2,141)</b>	<b>(2,188)</b>	<b>(2,236)</b>
<b>Expenditure</b>							
Repairs & Maintenance	4,161	3,964	(197)	4,318	4,321	4,391	4,404
Supervision & Management	3,090	3,167	77	3,456	3,466	3,508	3,588
Special Services	1,908	1,942	34	2,109	2,123	2,147	2,181
Rents, Rates and other Charges	86	110	24	102	99	99	99
Movement in Bad Debt Provision	(26)	50	76	37	35	37	37
Contribution to CDC & Pension Backfunding	650	552	(98)	87	87	87	87
Capital Charges	3,736	3,339	(397)	3,539	3,818	4,069	4,310
Interest Charges	2,275	2,270	(5)	2,265	2,270	2,270	2,270
Revenue Contribution to Capital	5,120	2,277	(2,843)	5,410	5,497	4,623	4,623
Transfer to Earmarked Reserves	-	2,494	2,494	-	-	500	500
<b>Total Expenditure</b>	<b>21,000</b>	<b>20,165</b>	<b>(835)</b>	<b>21,323</b>	<b>21,716</b>	<b>21,731</b>	<b>22,099</b>
<b>Movement in the HRA balance</b>	<b>437</b>	<b>(416)</b>	<b>(853)</b>	<b>317</b>	<b>309</b>	<b>(147)</b>	<b>(263)</b>
<b>HRA Balance carried forward</b>	<b>(4,422)</b>	<b>(5,275)</b>	<b>(853)</b>	<b>(4,958)</b>	<b>(4,649)</b>	<b>(4,796)</b>	<b>(5,059)</b>

### Highlights Regarding 2019/20 Forecast in table 5.1.

- 5.2 All income is still looking to come in close to the original budget. However, there are some large movements on the expenditure. There could potentially be a saving on repairs and maintenance. Details of repairs and maintenance can be seen in Section 7 and **Appendix C**. Some of the movement on repairs and maintenance relates to realignment of staffing, on supervision and management and special services.
- 5.3 There has been an increase on charges relating to void properties. This relates to the strategic management of some of the Council's housing stock to dispose of underperforming properties.
- 5.4 Although arrears are improving, the Council has erred on the side of caution regarding bad debt provision.
- 5.5 The cost for pension back funding provision in 2019/20 has been confirmed by Suffolk County Council to be less than anticipated (see Section 2.4).
- 5.6 Capital Charges relates to depreciation which has reduced due to delays in the capital programme.
- 5.7 Revenue contributions to capital have reduced significantly. This relates to the Housing Development and Redevelopment Programme. There have been reduced levels of staffing in this area during 2019/20. The work is being covered by a consultant four days per week. A

restructure has been put in place, and all posts should be filled by March 2020, which will result in the programme picking up again in 2020/21.

- 5.8 The savings from the reduced capital spend have been transferred into HRA reserves (see Section 9).

### **2020/21 to 2023/24 Budgets**

- 5.9 The table demonstrates a healthy HRA working balance. The carry forward balance from 2018/19 was £4.859 million, more than double the requirement. Best practice is considered to have a minimum working balance that approximates to 10% of the total income received in one year. The balance is planned to be drawn down in 2020/21 and 2021/22, to make best use of the funds, but remaining well above the required 10% minimum.

## **6 RENTS, SERVICES AND OTHER CHARGES**

### **Dwelling Rents**

- 6.1 In February 2019 the Government set out a new policy statement for social housing rents (the Policy Statement) with effect from 1<sup>st</sup> April 2020. This will replace the current legislative rent reduction of 1% until 31<sup>st</sup> March 2020 for the Council.
- 6.2 The Policy Statement will be implemented through the 2020 Rent Standard of the Regulator of Social Housing. For the first time the Government has directed the Regulator to apply its Rent Standard to all social housing providers, including local authorities. From 1<sup>st</sup> April 2020 annual rent increases will be permitted on both social and affordable rent of up to CPI (September of the previous year) plus 1% for at least five years to 2024/25. The Rent Standard also provides freedom to apply a lower increase or to freeze or reduce the rent if a registered housing provider chooses to do so.
- 6.3 The Council works on a 50-week rent period. The 52-week rent value is converted to the slightly higher 50-week value, allowing tenants to have two 'rent free weeks' over the Christmas period. This helps tenants at an expensive time of year, and for those in arrears, can help them 'catch up'. 2019/20 is an unusual year in that 53 rent weeks fall into it. If charged for, this would generate additional income to the HRA. However, tenants will not receive any additional benefits or UC to cover this week, resulting in tenants being required to pay for this from existing funds. This could result in many tenants, including 'good payers' going into arrears. The Council had not budgeted to receive this income, and therefore has decided to give week 53 as an additional 'free week'.

### *Social Rent*

- 6.4 Social rent is described as all low-cost rental accommodation. Since 2001 social rents have been set based on a formula set by Government. This new policy follows a similar process with the formula and rent setting guidance, set out in the Policy Statement. Annual updates to the formula calculations will be published in November of the previous year.
- 6.5 Under the Rent Policy the initial rent may be set at a level no higher than formula rent, subject to rent flexibility. The formula rent takes account of relative property values, relative local earnings and a bedroom factor, i.e. smaller properties should have lower rents. The formula rent is also subject to a rent cap. The rent cap applies a maximum ceiling on the formula rent. Therefore, if the formula rent is higher than the rent cap for a particular property, the rent cap must be used instead. The rent caps will increase each year by CPI (September of the previous year) plus 1.5%.

- 6.6 The Government's Rent Policy recognises that registered housing providers should have some flexibility over the rent set for individual properties, to take account of local factors, in consultation with tenants. As a result, the Policy Statement contains flexibility to set rents at up to 5% above the formula rent (10% for supported housing). However, it must be demonstrated that there is clear rationale for doing so which considers local circumstances and affordability. This flexibility can be applied to new developments.

#### *Affordable Rent*

- 6.7 Affordable rent is exempt from the social rent requirements of the Policy Statement. The Government expects new build properties to be let at affordable rent values. Affordable rent allows the Council to set rents at a level that are typically higher than social rents. The intention behind this flexibility is to enable local authorities to generate additional capacity for investment in new affordable homes. The Council is applying affordable rents to new build or purchased properties and can do so as it has an agreement in place with the Secretary of State. The agreement allows the Council to retain RTB receipts for investment in new affordable rented homes.
- 6.8 The rent for affordable rent housing (inclusive of service charges) must not exceed 80% of gross market rent, i.e. rent for which the accommodation might reasonably be expected to be let in the private rented sector. The size, location and service provision must be taken into account.
- 6.9 Affordable rents must not increase by more than CPI (September of the previous year) plus 1%. As with social rent setting, this is a ceiling and a lower increase, or to freeze or reduce affordable rents is permitted.

#### *Dwelling Rent Budget for 2020/21 Onwards*

- 6.10 In accordance with the Rent Standard for 2020, rent increases for 2020/21 can be increased by up to 2.7%. This is the CPI for September 2019 of 1.7% plus 1%. By applying the rent setting policy as set out in sections 6.1 to 6.9 above, the average weekly rent for the HRA for 2020/21 is £84.95 (£83.05 for 2019/20) and is based on a 50-week collection year. This is an average weekly increase of £1.90 or 2.3% from 2019/20 to 2020/21. This generates additional income for the HRA for 2020/21 of approximately £430k. The HRA Financial Business Plan had previously forecast an increase of 3% for the period 2020/21 to 2022/23, which has been revised to 2.7%. However, 2023/24 was forecasted at 2% which has been increased to 2.7%. Therefore, this has had little impact on the budget. A prudent approach will continue to be taken, assuming a consistent 2% from 2024/25 thereafter.
- 6.11 Other factors are also taken into consideration when calculating the dwelling rent budget. Such as disposals through RTB's or asset management of underperforming stock, reconversions, new build developments and acquisitions.

#### **Service Charges**

- 6.12 Service charges are those charges payable by tenants to reflect additional services which may not be provided to every tenant, or which may be connected with communal facilities, e.g. heating services and communal facilities in sheltered accommodation (Grouped Homes).
- 6.13 Councils can review their service charges annually. Service charges should be sufficient to cover the cost of providing the service and are not governed by the same factors as rents. Therefore, not all service charges will necessarily increase each year, they will replicate the cost of the service provided. As set out in the Policy Statement, increases for service charges

should be managed, where possible, within the limit on rent changes of CPI plus 1%. Exceptions to this include new charges or where services have been extended.

- 6.14 The proposed service charges for 2020/21 are set out in **Appendix B** of this report. The costs of providing the services have been reviewed and set at a level to ensure that the costs are recovered. The HRA does not make a profit on the service charges, these are purely to recover HRA costs.
- 6.15 Many of the service charges, outlined in **Appendix B** will not increase in 2020/21. This is due to contracts that run for more than one year for a fixed price, or new contracts have been tendered resulting in reduced costs.
- 6.16 Grouped Home service charges relate to services provided to sheltered schemes and communal utility costs. The proposed general service charge for grouped homes for 2020/21 is set at an average weekly charge of £12.85 based on a 50-week collection year. This is a decrease of £1.02 compared to 2019/20. The new charge reflects the savings on providing the service.
- 6.17 The average heating charge is set to increase in 2020/21. The 2020/21 average Grouped Homes heating charge is £14.85 based on a 50-week collection year. This is an average weekly increase of £2.01 compared to 2019/20. Heating tariffs have increased in cost.

#### **Other Charges**

- 6.18 Garage rents are also set out in **Appendix B**. Garage rents are also collected on a 50-week collection period. For 2020/21 tenant's weekly garage rent is proposed to increase from £7.00 to £8.00, an increase of £1.00 on the 2019/20 charge. The proposed increased for non-tenant weekly garage rent is £11.40 from £10.00 (inclusive of VAT), an increase of £1.40 on the 2019/20 charge.
- 6.19 The increases are a reflection from extensive market research in the district.
- 6.20 Garage rents are to be considered for approval by Cabinet on 7<sup>th</sup> January 2020 as part of the 2020/21 Fees and Charges Report.

## **7 REPAIRS AND MAINTENANCE**

- 7.1 The HRA repairs and maintenance (R & M) programme is split between capital and revenue. Revenue costs are to be funded from the revenue income derived from rents, whilst capital will be funded from the Major Repairs Reserve (MRR).
- 7.2 The repairs and maintenance revenue budget for 2020/21 has been set at £4.318 million, compared to £4.161 million in the 2019/20 budget. An analysis of the R & M revenue budget is set out in **Appendix C**. The £157,000 increase is due to a combination of things. £100,000 relates to growth on electrical testing. This is to cover the 'peak' of testing during 2020/21. The remaining £57,000 relates to increased staff costs, due to the change in the accounting treatment for the pension back funding, (see paragraph 2.4).
- 7.3 The amounts included in the repairs and maintenance revenue budget are deemed sufficient to allow the Council to carry out all necessary major works and to maintain the decent homes standard in all its properties.

## **HRA Capital Programme**

- 7.4 The HRA capital programme forms part of the Council's overall capital programme, which is presented to Cabinet and Council at the same meeting as the HRA Budget Report. The HRA capital programme consists of capital budgets for housing repairs, project development and the Housing Development Programme.
- 7.5 The HRA capital programme will be funded via the rental income it retains, the Major Repairs Reserve (MRR), Right-to-Buy (RTB) receipts, external funding and capital receipts held. Details of the MRR are set out in paragraph 9.3. Funding of the repairs and maintenance aspect of the capital programme is through the MRR. The 2020/21 HRA capital programme is partly funded by Direct Revenue Financing, which totals £5.410 million. This represents £2.392 million towards housing projects and redevelopment and £3.018 million on the Housing Development Programme.
- 7.6 The Private Sector Housing Team continues to work hard, improving some of the most vulnerable stock in the District and ensuring that Disabled Facilities Grants are delivered to those who need such works to enable them to stay in their own home. These funds are provided by central Government with the HRA paying the cost of such works for its own council properties.

## **8 SPECIAL SERVICES**

- 8.1 Special Services are made up of costs for Sheltered Schemes, Warden Services, Redevelopment and the New Build Programme. As the Redevelopment and New Build Programmes pick up pace, the associated revenue costs also increase. These costs include architect fees, consultant's fees and staffing.

## **9 HRA BALANCES AND RESERVES**

- 9.1 The HRA has five Reserves as well as the HRA revenue working balance (see paragraph 5.9 for details on the revenue working balance). **Appendix D** shows the movement and balances of these reserves for the budget period 2019/20 to 2023/24.
- 9.2 Taking the Welfare Reform Act 2012 into account, the Council established an HRA Discretionary Housing Payments (DHP) 'top up' Reserve in 2012/13 with a fund of £500,000, recognising the unexpected and exceptional difficulties tenants may face arising from these changes. This reserve is to 'top up' the DHP's made by the Council by the value used by HRA tenants, only if the total payments made were to exceed the value of the DHP grant received by the Council. As yet, this has not been required. With increased Department for Work and Pensions (DWP) grant in recent years, it is unlikely to be required in 2019/20. However, the reserve will remain, in case it is required for future years. If any funds are to be transferred, it would require approval by the Secretary of State.
- 9.3 Following the introduction of the Self-Financing on 1<sup>st</sup> April 2012 and to meet changes in Accounts and Audit Regulations from 2012/13, depreciation charged to the HRA is no longer in the movement on the HRA statement. Instead, the depreciation charged to the HRA is credited to the Major Repairs Reserve (MRR). The MRR can be used to repay the principal elements of the HRA debt, as well as to finance capital expenditure on our existing dwelling stock. There are plans to use the MRR to part fund the capital programme in each year, whilst still increasing its balances to service future year's debt repayments. The balance as at 31<sup>st</sup>

March 2024 is projected to be a healthy £10.525 million, after paying the first instalment of £10.766 million borrowing that is due in 2021/22.

- 9.4 The viability of the Self-Financing regime depends ultimately on the Council acting prudently and in doing so, setting sufficient sums aside to meet its future liabilities. The transfer of funds to the Debt Repayment Reserve gives the Council flexibility around its future decisions for repaying the debt. The balance as at 31<sup>st</sup> March 2024 is forecasted to be £11.5 million. This is planned to pay the second substantial borrowing instalment of £10 million in 2026/27. Future debt repayment instalments will be funded by both the Debt Repayment Reserve and the MRR.
- 9.5 At 31<sup>st</sup> March 2019 the Council's housing stock totalled 4,446 units. Between 31<sup>st</sup> March 2019 and the 30<sup>th</sup> November 2019 there have been 17 RTB sales. This brings the current housing stock to 4,429 units.

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

- 10.1 The HRA Budget directly supports the Council's aim of Financial Self Sufficiency. With balanced budgets, and the ability to pay off its current debt, it demonstrates its ability to be financially self-sufficient.
- 10.2 In addition to demonstrating Financial Self-Sufficiency, the budget provides the finances to contribute to a number of the East Suffolk Business Plan action points, including specifically, 'Increase the number of new Council Houses', and 'Increase the opportunities and number of affordable homes'.

## **11 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 11.1 The HRA Self-Financing regime transfers the financial risk to the Council. The HRA manages this risk through prudent budgeting, careful financial management and adoption of a rolling 30-year Financial Business Plan. The financial sustainability of the budget is managed by ensuring adequate funds are set aside to repay the debt and appropriate levels of working balances are available for any unforeseen costs. It also gives the HRA the opportunities to meet its business objectives whilst creating efficiencies and savings, giving added value for money.

## **12 OTHER KEY ISSUES**

- 12.1 This report has been prepared having considered the results of an Equality Impact Assessment, and no issues have been identified. The proposed increase in rent will be eligible for Housing Benefit or Universal Credit. This means that tenants who are in receipt of limited incomes will not be disadvantaged.
- 12.2 The self-financing regime and the use of the 30-year financial business plan provides, long-term certainty over the Council's future investment decisions.

## **13 CONSULTATION**

- 13.1 The proposed average weekly rent increase of £1.90 or 2.3% will be presented at the next Housing Benefit and Tenants Services Consultation Group on 20<sup>th</sup> January 2020.

## 14 OTHER OPTIONS CONSIDERED

- 14.1 Following four years of compulsory rent reduction, setting rents for 2020/21 below the maximum permitted under the Rent Standard is not recommended for the following reasons:
- 1) Under self-financing, the debt settlement figure that the Council can afford is based on a valuation of the Council's housing stock. This valuation is based on assumptions about income and need to spend over 30 years and that the Council will follow the Government's social rent policy. Therefore, the main disadvantage of setting rents lower than that permitted by the Rent Standard is the loss of revenue over the 30 years of the HRA Business Plan, the ability to service the debt and the adverse impact this will have on investment in the Council's existing housing stock and the delivery of the Housing Development Programme as currently planned. There is an expectation from Government for the social housing sector to make the best use of their resources to provide the homes needed.
  - 2) The HRA has the option to borrow additional funds for future projects, as the borrowing cap has been removed, but the affordability of taking any additional borrowing would need to be assessed. At this time there is no need to make use of any additional borrowing, but this situation could change if rental income streams are not maintained.

## 15 REASON FOR RECOMMENDATION

- 15.1 To bring together all relevant information to enable Members to review, consider and comment upon the Council's Housing Revenue Account budgets, the average weekly housing rent, service and other charges and movements in reserves and balances, before making recommendations to Full Council on 22<sup>nd</sup> January 2020.
- 15.2 To advise Members of the wider housing and welfare changes that will impact on future service delivery.

### RECOMMENDATIONS

That Cabinet recommends to Full Council to:

1. Approve the Housing Revenue Account Budget for 2020/21, and the indicative figures for 2021/22 to 2023/24;
2. Note the forecast outturn position for 2019/20;
3. Approve the movements in Reserves and Balances as presented in **Appendix D**;
4. Approve the average weekly rent for 2020/21 of £84.95 over a 50-week collection year, an average weekly increase of £1.90 or 2.3%;
5. Note the new Rent Policy Statement and Rent Standard for 2020 with effective from 1<sup>st</sup> April 2020;
6. Approve the Service Charges and associated fees for 2020/21, **Appendix B**; and
7. Note the changes affecting public and private sector housing and welfare.

<b>APPENDICES</b>	
<b>Appendix A</b>	Summary of Headings on HRA Chart of Accounts
<b>Appendix B</b>	HRA Service and Other Charges
<b>Appendix C</b>	HRA Repairs and Maintenance Revenue Budgets
<b>Appendix D</b>	HRA Balance and Reserve Summary
<b>Appendix E</b>	HRA Budget Key Assumptions

<b>BACKGROUND PAPERS</b>		
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.		
<b>Date</b>	<b>Type</b>	<b>Available From</b>
November 2019	Equality Impact Assessment	Financial Services Team
31 <sup>st</sup> October 2019	Regulator of Social Housing - Rent Standard April 2020	<a href="https://www.gov.uk/government/consultations/consultation-on-a-new-rent-standard-from-2020">https://www.gov.uk/government/consultations/consultation-on-a-new-rent-standard-from-2020</a>
26 <sup>th</sup> February 2019	MHCLG – The Direction on the Rent Standard 2019	<a href="https://www.gov.uk/government/publications/direction-on-the-rent-standard-from-1-april-2020">https://www.gov.uk/government/publications/direction-on-the-rent-standard-from-1-april-2020</a>
26 <sup>th</sup> February 2019	MHCLG – Policy statement on rents for social housing	<a href="https://www.gov.uk/government/publications/direction-on-the-rent-standard-from-1-april-2020">https://www.gov.uk/government/publications/direction-on-the-rent-standard-from-1-april-2020</a>



**SUMMARY OF HEADINGS ON CHART OF ACCOUNT****Income;**

- **Dwelling Rent;** Rental income from tenants for housing (Including Housing Benefits).
- **Non-Dwelling Rent;** Rental income for garages, and any other assets rented out by the HRA.
- **Services and other Charges;** Service Charges and nonspecific income.
- **Leaseholders charges for services;** Recharges to Leaseholders for works and services.
- **Contributions towards expenditure;** External contributions towards expenditure.
- **Reimbursement of costs;** Rechargeable works to a third party.
- **Interest Income;** Interest received on cash balances held by the HRA.

**Expenditure;**

- **Repairs and Maintenance;** General Repairs and Maintenance to all housing stock.
- **Supervision and Management;** Costs associated with running the HRA, e.g. tenant's services, office-based staff, IT etc.
- **Special Services;** Sheltered schemes, warden costs, property acquisitions, redevelopment and new development costs.
- **Rents, Rates and other Charges;** Council Tax charges for void properties.
- **Movement in Bad Debt Provision;** Bad debt provision is to hold funds to cover debt (arrears) that are unlikely to be recovered by the HRA. The current bad debt provision is £822k.
- **Contribution to CDC & Pension Back funding;** CDC is Corporate & Democratic Core costs. This is the HRA's contribution towards these and pension back funding.

\* NOTE; Contribution towards pension back funding is included in the pension cost to individual departments from 2020/21.

- **Capital Charges;** Depreciation charged to HRA assets. (This is transferred to the Major Repairs Reserve. This can fund capital work or contribute to paying down the debt).
- **Interest Charges;** The interest payments relating to HRA borrowing.
- **Revenue contribution to Capital;** Capital expenditure is large repairs work such as 'replacing a kitchen' or building new properties. These are funded from either the HRA 'Revenue Contribution', receipts held through the sale of assets (e.g. Right to Buy Properties), or other reserves and contributions.
- **Transfer to Earmark Reserves;** The HRA has several reserves, but the one used most frequently is the Debt Repayment Reserve. Money is transferred to this reserve each year to pay off the debt held by the HRA.

## HRA SERVICE AND OTHER CHARGES

The following charges are based on a 50 week collection year. Under current policies, the following increases/(Decreases) in charges are proposed for 2020/21.

	Average Weekly Charge 2019/20 £	Average Proposed Weekly Charge 2020/21 £	Average Weekly Increase/ (Decrease) £
<b>Grouped Homes Service Charges:</b>			
General Service Charge	13.87	12.85	(1.02)
Heating Charge	12.84	14.85	2.01
Communal Water Charge	2.85	2.93	0.08
Support Charge	3.33	3.33	0.00
Laundry	3.90	3.90	0.00

	Weekly Charge 2019/20 £	Proposed Weekly Charge 2020/21 £	Weekly Increase/ (Decrease) £
<b>Caretaker:</b>			
St Peter's Court	5.50	6.15	0.65
Dukes Head Street	4.10	4.55	0.45
Chapel Court	3.00	3.35	0.35

<b>Servicing:</b>			
Electric Central Heating System (Wet Systems)	1.60	1.60	0.00
Solid Fuel Central Heating System	2.36	2.36	0.00
Gas Fire	0.50	0.50	0.00
Ecordan Central Heating System Air Source Heat Pump	2.30	2.30	0.00
Septic Tank Emptying/Servicing	5.18	5.34	0.16
Flue Maintenance	2.36	2.36	0.00
Grounds Maintenance	1.38	1.38	0.00

<b>Other:</b>			
Communal Area Cleaning Service	0.52	0.54	0.02

	Weekly Charge 2019/20 £	Proposed Weekly Charge 2020-21 £	Weekly Increase/ (Decrease) £
<b>Garage Rents:</b>			
Tenants	7.00	8.00	1.00
Non Tenants (net of VAT)	8.33	9.50	1.17 (11.40 inclusive of VAT)

## HRA REPAIRS &amp; MAINTENANCE REVENUE BUDGETS

	2019/20 Approved Budget	2019/20 Forecast Outturn	2020/21 Budget	2021/22 Budget	2022/23 Budget	2023/24 Budget
	£	£	£	£	£	£
<b>Responsive Maintenance</b>						
Jobbing Repairs	1,345,700	1,348,600	1,552,100	1,604,200	1,636,700	1,634,100
Mutual Exchange (See note 1 below)	0	0	10,000	10,000	10,000	10,000
Tenant Allowances	50,000	50,000	50,000	50,000	50,000	50,000
Disabled Adaptations (See note 2 below)	190,000	190,000	190,000	190,000	190,000	190,000
Environmental Works	5,000	5,000	5,000	5,000	5,000	5,000
Fire Fighting Equipment and Detection	22,500	22,500	18,000	18,000	18,000	18,000
Door Porter and Security Systems (See Note 3 below)	17,000	2,000	0	0	0	0
Solid Fuel and Heating Repairs (See Note 4 below)	41,000	40,000	13,000	13,000	13,000	13,000
Emergency Lighting	7,000	15,000	7,000	7,000	7,000	7,000
Drainage and Pumping Stations	5,000	9,400	8,900	8,900	8,900	8,900
Insurance / Misc. - expenditure (See Note 5 below)	17,000	0	0	0	0	0
Rechargeable Works - Incl's Leaseholder Properties	25,000	40,000	40,000	40,000	40,000	40,000
Relet Repairs (Voids)	903,000	904,500	904,000	914,000	924,000	924,000
Lifts	8,000	8,000	8,000	8,000	8,000	8,000
Roof and PVC Panelling Cleaning	36,000	20,000	37,000	37,000	39,000	39,000
External Decoration	115,000	115,000	120,000	120,000	130,000	130,000
Loft Insulations (See Note 6 below)	5,000	0	0	0	0	0
Servicing Contracts & Repairs	561,500	475,000	486,500	500,500	515,500	530,500
Asbestos - Removal	80,000	80,000	80,000	80,000	80,000	80,000
Asbestos - Testing	95,000	95,000	95,000	95,000	95,000	95,000
Legionella	6,000	6,000	6,000	6,000	6,000	6,000
Electrical Testing & Repairs (See Note 7 below)	100,000	200,000	200,000	100,000	100,000	100,000
Communal Areas	57,000	35,000	58,000	60,000	60,000	60,000
<b>Total Responsive Maintenance</b>	<b>3,691,700</b>	<b>3,661,000</b>	<b>3,888,500</b>	<b>3,866,600</b>	<b>3,936,100</b>	<b>3,948,500</b>
<b>Planned Maintenance</b>	<b>£</b>	<b>£</b>	<b>£</b>	<b>£</b>	<b>£</b>	<b>£</b>
Bathrooms (See Note 8 below)	40,000	0	0	0	0	0
Chimneys	30,000	20,000	30,000	30,000	30,000	30,000
External Walls	25,000	45,000	25,000	30,000	30,000	30,000
Canopy / Porches (See Note 9 below)	6,000	0	0	0	0	0
Paths / Hardstanding	230,000	150,000	235,000	245,000	245,000	245,000
Boundary / Retaining Walls	23,000	23,000	25,000	30,000	30,000	30,000
Outbuildings	35,000	15,000	35,000	40,000	40,000	40,000
Structural / Damp / Drainage / etc	80,000	50,000	80,000	80,000	80,000	80,000
<b>Total Planned Maintenance</b>	<b>469,000</b>	<b>303,000</b>	<b>430,000</b>	<b>455,000</b>	<b>455,000</b>	<b>455,000</b>
<b>Total HRA Housing Repairs</b>	<b>4,160,700</b>	<b>3,964,000</b>	<b>4,318,500</b>	<b>4,321,600</b>	<b>4,391,100</b>	<b>4,403,500</b>

**Notes:**

Note 1 - A new charge is being introduced in 2020/21 for mutual exchanges. This fee will contribute towards the cost, producing a saving for the Council. This is a charge that many Councils have in place.

Note 2 - The Housing team completes Disabled Adaption works for the Private Sector Housing team. Income is received for this work covering the increase in costs.

Note 3 - Door Porter security system charges are now accounted for directly under the schemes they relate to, giving a true cost of each asset. The total cost is still the same as 19/20 original budget.

Note 4 - More heating repair costs are covered under the central contract, saving money on repairs costs.

Note 5 - Budget removed for insurance claims and only budgeted for, if and when they happen.

Note 6 - Most lofts are now insulated. These will be picked up under normal jobbing repairs in the future.

Note 7 - Budget for electrical testing increased for 2 years. There is a peak in the planned cycle testing programme.

Note 8 - Most Bathroom related costs are capital costs. Revenue costs to be picked up under jobbing repairs.

Note 9 - Very few Canopy or porches requiring work now. Therefore, costs are now picked up under jobbing repairs.

## HRA BALANCE AND RESERVE SUMMARY

HRA WORKING BALANCE

	2019/20 Movements			2020/21 Movements			2021/22 Movements			2022/23 Movements			2023/24 Movements		
	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers
	31/03/19 £'000	In £'000	Out £'000	31/03/20 £'000	In £'000	Out £'000	31/03/21 £'000	In £'000	Out £'000	31/03/22 £'000	In £'000	Out £'000	31/03/23 £'000	In £'000	Out £'000
HRA Working Balance	-4,859	-416	0	-5,275	0	317	-4,958	0	309	-4,649	-147	0	-4,796	-263	0

HRA EARMARKED RESERVES

	2019/20 Movements			2020/21 Movements			2021/22 Movements			2022/23 Movements			2023/24 Movements		
	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers
	31/03/19 £'000	In £'000	Out £'000	31/03/20 £'000	In £'000	Out £'000	31/03/21 £'000	In £'000	Out £'000	31/03/22 £'000	In £'000	Out £'000	31/03/23 £'000	In £'000	Out £'000
Debt Repayment Reserve	-10,000	-500	0	-10,500	0	0	-10,500	0	0	-10,500	-500	0	-11,000	-500	0
HRA DHP topup Reserve	-500	0	0	-500	0	0	-500	0	0	-500	0	0	-500	0	0
MMI Reserve	-66	0	6	-60	0	0	-60	0	0	-60	0	0	-60	0	0
Impairment/Revaluation Reserve	-256	0	0	-256	0	0	-256	0	0	-256	0	0	-256	0	0
Acquisition & Development Reserve	-1,500	-2,000	0	-3,500	0	3,500	0	0	0	0	0	0	0	0	0
<b>Total HRA Earmarked Reserves</b>	<b>-12,322</b>	<b>-2,500</b>	<b>6</b>	<b>-14,816</b>	<b>0</b>	<b>3,500</b>	<b>-11,316</b>	<b>0</b>	<b>0</b>	<b>-11,316</b>	<b>-500</b>	<b>0</b>	<b>-11,816</b>	<b>-500</b>	<b>0</b>

HRA CAPITAL RESERVE

	2019/20 Movements			2020/21 Movements			2021/22 Movements			2022/23 Movements			2023/24 Movements		
	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers	Closing Balance	Transfers	Transfers
	31/03/19 £'000	In £'000	Out £'000	31/03/20 £'000	In £'000	Out £'000	31/03/21 £'000	In £'000	Out £'000	31/03/22 £'000	In £'000	Out £'000	31/03/23 £'000	In £'000	Out £'000
HRA Major Repairs Reserve	-19,630	-3,318	2,841	-20,107	-3,518	3,550	-20,075	-3,796	14,311	-9,560	-4,047	3,685	-9,922	-4,288	3,685

## HRA BUDGET KEY ASSUMPTIONS

The following key assumptions have been made in the budgets.

<b>Income</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
Dwelling rents annual increase	2.7%	2.7%	2.7%	2.7%
Allowance for voids - % of total rent roll	1.3%	1.3%	1.3%	1.3%
Garage rents annual increase *	14.0%	2.0%	2.0%	2.0%
Charges for services & facilities annual increase	1.00%	1.00%	1.00%	1.00%
Write-off allowance	£100,000	£100,000	£100,000	£100,000
Number of dwellings lost through Right To Buys (RTB's)	30	30	30	30
Number of new dwellings added to the stock	30	50	50	50
Average interest rate on HRA balances	0.74%	0.74%	0.74%	0.74%
<b>Expenditure</b>				
Average interest rate on variable debt	1.00%	1.00%	1.00%	1.00%

\* 2020/21 High % increase is based on market research in the local area and charge is very low.

**CABINET**

Tuesday 7 January 2020

**REVIEW OF THE LOCAL COUNCIL TAX REDUCTION SCHEME FOR 2020/21****EXECUTIVE SUMMARY**

Each year the Council is required to consider whether to review its Local Council Tax Reduction Scheme (LCTRS). This report advises Cabinet about the findings of the 2019 annual review; the consultation on these findings; and the resultant proposals for changes to the LCTRS scheme to take effect from April 2020.

Is the report Open or Exempt?	Open
<b>Wards Affected:</b>	All Wards in East Suffolk
<b>Cabinet Member:</b>	<p>Councillor Steve Gallant Leader of the Council and Cabinet Member with responsibility for Resources</p> <p>Councillor Maurice Cook Assistant Cabinet Member for Resources</p>
<b>Supporting Officer:</b>	<p>Simon Taylor Chief Finance Officer and Section 151 Officer 01394 444570 <a href="mailto:simon.taylor@eastsuffolk.gov.uk">simon.taylor@eastsuffolk.gov.uk</a></p> <p>Brian Mew Finance Consultant 01394 444571 <a href="mailto:brian.mew@eastsuffolk.gov.uk">brian.mew@eastsuffolk.gov.uk</a></p> <p>Adrian Mills Benefits and Billing Strategic Manager ARP 01842 756491 <a href="mailto:adrian.mills@angliarevenues.gov.uk">adrian.mills@angliarevenues.gov.uk</a></p>

## **1 INTRODUCTION**

- 1.1 Councils are required to consider whether to review their LCTRS schemes annually. Where it is determined to retain the existing scheme, this must be decided by 11<sup>th</sup> March of the preceding year.
- 1.2 Where Councils seek to amend their scheme it is necessary to consult preceptors and stakeholders prior to a wider consultation to inform a final scheme design by 28<sup>th</sup> February of the preceding year.

## **2 CURRENT POSITION**

- 2.1 The current East Suffolk LCTRS scheme provides a maximum benefit of 91.5% for working age claimants and the scheme also protects War Pensioners. The aim in designing the scheme was to achieve a balance in charging an amount of Council Tax to encourage customers back into work whilst setting the amount charged at an affordable and recoverable level.
- 2.2 By setting the amount payable at 8.5% of the charge, in most cases, where a customer is not paying, we can affect recovery through attachment to benefit within a year and so the charge with costs is recoverable. If the amount payable was set higher, then it is possible the debt would not be recoverable and possibly create a culture of non-payment of Council Tax.
- 2.3 The Shadow Council approved retaining the existing scheme for 2019/20 in February 2019.

## **3 SCHEME REVIEW – OPTIONS TO CONSIDER**

- 3.1 Claims dependent upon Universal Credit (UC) have become increasingly apparent since the Council entered the UC full service during summer 2018, whereby most new claims now go through UC and are received by ARP through the Universal Credit Data Sharing hub (UCDS).
- 3.2 UC is designed to be paid monthly, calculated on the customer's circumstances, including Real Time Information (RTI) earnings data from HMRC every month. As customers' circumstances, especially earnings, fluctuate, this leads to monthly revised UC awards being sent to the Council by the DWP.
- 3.3 The existing Council Tax Support scheme rules require the Council to revise awards when a customer's Universal Credit changes leading to reassessment of Council Tax Support. This means customers receive a revised Council Tax bill for the balance due for the year and have to amend their payment arrangements, typically direct debit instructions. Increasingly, this can be a monthly occurrence for customers.
- 3.4 There has been an increase in customer contact regarding these notifications because customers are unsure as to what they must pay due to the requirement to re-profile their Council Tax payments on receipt of UCDS files on a monthly basis. This uncertainty has an impact on Council Tax collection, as well as increased administration costs and postage associated with producing additional notification letters.
- 3.5 Within the Anglia Revenues Partnership, the former Waveney District Council, now part of East Suffolk Council, has been in the UC Full Service the longest, since May 2016, and there has been a 72% increase in revised UC awards sent to the Council. Over time this pattern is expected to continue and increase for all the partner Councils, given that full service has been rolled out nationally and UC is set to expand.
- 3.6 To ease the burden on the customer, it is recommended that a tolerance rule is introduced into the Council's scheme. This would have the effect of freezing a customer's assessment when a revised UCDS notification would otherwise trigger a reassessment. UCDS changes

notified above the tolerance level would be processed as usual. Changes within the tolerance level would not be updated, no correspondence issued to the customer, and no amendment made to Council Tax repayments.

- 3.7 UCDS award notifications have been analysed over a three-month period. The table below shows the level of reduction in reassessments for changes in UC banded in £5 increments, were a tolerance rule to be applied:

	£5.00	£10.00	£15.00	£20.00	£25.00
Reduction in reassessments	14%	21%	32%	32%	36%

- 3.8 A weekly tolerance level of £15 (£65 monthly) is recommended to achieve a 32% reduction in revised Council Tax adjustments. A £10, 21% reduction is considered to be less effective, whilst there is little to gain by increasing the tolerance level. Setting the tolerance level at £15 equates to less than two hours employment at national minimum hourly rates.
- 3.9 A relatively small tolerance level will ensure smoothing of customers' fluctuating UC awards and will not disadvantage those customers receiving greater or occasional beneficial changes.
- 3.10 It should be noted where customers' circumstances noticeably change, for example when employment ceases, the tolerance rule will not apply, given the change will be greater than £15 per week. In these circumstances the customer's Council Tax Support will be immediately adjusted to provide extra benefit.
- 3.11 It is also recommended that the changes to the Council Tax Support Scheme include discretion to reassess entitlement where a reduction in earnings occurs and it is clear that this level of earnings have and will be likely to continue at a lower level.
- 3.12 The table below illustrates the effect on a sample of seven cases of the introduction of a £15 weekly tolerance level in terms of both the number of re-assessments required and the difference in CTRS awards during the year. A typical case would currently have 12 monthly reassessments and 12 amended Council Tax bills during the year. However, with a tolerance rule a typical customer will only have 4 monthly reassessments and the weekly difference in support would be £0.27p per week.

	Number of Re-assessments		Difference in CTRS pa
	Current	£15 pw tolerance	
Case 1	12	8	£9.67
Case 2	9	3	£13.86
Case 3	9	6	(£24.21)
Case 4	9	5	(£7.62)
Case 5	12	0	(£2.76)
Case 6	6	4	(£12.99)
Case 7	8	7	£0.00

- 3.13 Work is ongoing with our software supplier to introduce additional functionality to enable a tolerance rule, along with automation of these assessments.

## 4 CONSULTATION

- 4.1 The consultation commenced Monday 23rd September 2019 and concluded on Sunday 3rd November 2019. As the changes proposed were relatively small, a six-week consultation was considered appropriate. The proposal consulted on was to introduce a tolerance rule to the treatment of some Universal Credit (UC) monthly awards, to



provide stability to customers who are having to alter their Council Tax repayments. The consultation paper is attached as Appendix A.

- 4.2 The Consultation was available on the Council's website and the Anglia Revenues Partnership website. In addition, in an attempt to get as much interest as possible, everyone on the Council's Register of Consultees that had expressed an interest in 'corporate issues' and the consultees on a list provided by ARP, were notified directly as to where to find the consultation document. The consultation was further discussed at a Benefits Stakeholder liaison meeting held by the Anglia Revenues Partnership at Thetford on the 7th October 2019 and a separate letter sent to major Preceptors.
- 4.3 Stakeholders at the liaison meeting did not express any concerns with the proposed change, and we have not received any direct responses.
- 4.4 Suffolk County Council and Suffolk Fire & Rescue Service both responded stating that proposed changes looked sensible.
- 4.5 Eleven responses were received to the wider consultation, all from individuals except one from a Parish Council. Nine (82%) of the eleven responses supported the proposed change, with one disagreeing and one not sure. Seven respondents agreed that a £15 weekly tolerance level would be right, three disagreeing and one not responding. Eight respondents agreed East Suffolk should have discretion to review cases where a single change during the year disadvantages the customer; one felt there should not be such provision. Ten of the respondents live in the East Suffolk area, whilst ten state they do not receive Universal Credit, nor have they claimed, with one respondent preferring not to say.

The consultation exercise resulted in a positive response to the changes proposed and, on this basis, Cabinet are asked to recommend to Full Council at its meeting on 22nd January 2019 to adopt the changes detailed in paragraph 4.1.

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

- 5.1 The proposals in this report will assist claimants in East Suffolk district through reducing customer notifications and contact; eliminating continuous changes to the benefits they receive through stable council tax repayment arrangements; and making their financial position much more stable.

## **6 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 6.1 As referred to in section 3.12, the modelling shows for a typical claimant, the smoothing over a 12 months period results in a £0.27 difference per week, and therefore the financial implications for the Council are minimal.

## **7 OTHER KEY ISSUES**

- 7.1 The existing LCTRS scheme continues the DWP's previous Council Tax Benefit scheme conventions established over many years, regarding protections for vulnerable groups, including children, the disabled and the Armed Forces. The changes proposed are relatively minor and consequently, it is not considered that an Equality impact Assessment (EIA) is required.

## **8 OTHER OPTIONS CONSIDERED**

- 8.1 A more significant policy option would be to consider increasing the contribution rate to more than 8.5%. The possible increase in Council Tax collected for the Council resulting from this is considered to be less than the additional costs of recovery (additional staff, postage

and enquires to customer services), including the inability to recover the debt in year by deduction from DWP benefits and therefore this is not recommended.

- 8.2 The changes made to the current scheme have worked well – introducing a tolerance rule for the treatment of UC awards will reduce the number of notifications customers receive to amend their Council Tax payments and provide stability for customer repayments whilst reducing customer contact.

## **9 REASON FOR RECOMMENDATION**

- 9.1 The Council has completed its annual review of the LCTR scheme it operates and has identified improvements that will both help claimants and the Council reduce the amount of administration and improve clarity within the current scheme.

### **RECOMMENDATIONS**

1. That Cabinet recommends to Full Council that the Council retains the current Local Council Tax Reduction Scheme for 2020/21 as the 8.5% benefit scheme, i.e. the maximum benefit to working age claimants is 91.5%.
2. That Cabinet recommends to Full Council that the Council introduces a tolerance to the treatment of Universal Credit income in the Local Council Tax Reduction Scheme as detailed in this report.

### **APPENDICES**

<b>Appendix A</b>	LCTRS Consultation Document
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### **BACKGROUND PAPERS – None**

## Council Tax Reduction Scheme - Proposals

### Introduction

East Suffolk Council is proposing a change to its Local Council Tax Reduction Scheme. If implemented, this would mean people claiming Universal Credit would not see a change in the amount of council tax they have to pay unless their weekly income changes by more than £15, or £65 in a month.

The purpose of the change is to provide people claiming Universal Credit more certainty over their Council Tax bills and their finances.

This consultation is open until Sunday 3 November. Feedback will then be considered before a final proposal is given to councillors in early 2020.

If agreed, the change would come into effect from April 2020. The proposed change would not apply to people who have reached state pension age or are not on Universal Credit.

(For information, for Universal Credit customers East Suffolk intends to change when it assesses entitlement to Council Tax Support from DWP notification that a UC claim has been made to when DWP notifies the actual award. The effect of this is to avoid correcting awards, whilst ensuring they are correct first time, which is seen as beneficial for customers and does not have any financial impact.)

**1. Do you agree that the council should freeze the level of council tax Universal Credit claimants pay, unless their income changes by more than a set amount (e.g. £15 per week)?**

Strongly agree

Agree

Don't know

Disagree

Strongly disagree

**2. The council is proposing that council tax will only be reassessed for Universal Credit claimants if council tax support changed by more than £15 per week. This amount is based on the results of a review about the ability of Universal Credit claimants to pay their Council Tax when their income changes. Do you agree that this is the right figure?**

Yes

No

**3. If you said no to question 2, what do you think a more appropriate income change amount would be? If so, please tell us why.**

£5

£10

£20

£25

Other (please specify)

**4. If changes in people's income is consistently less than the agreed amount (currently £15 is being proposed), they may pay more council tax over the course of the year compared to if they were reassessed. Therefore, should the council be able to choose to not apply the new income change rule and recalculate somebody's council tax bill during the year.**

Yes

No

**5. Any other comments?**

**6. Do you live in East Suffolk?**

Yes

No

Prefer not to say

**7. Do you currently or have you ever claimed Universal Credit?**

Yes

No

Prefer not to say

**8. Any other comments?**



## CABINET

Tuesday 7 January 2020

### BECCLES LIDO LTD IMPROVEMENT BID – EXCEPTIONAL CIL FUNDING REQUEST

#### EXECUTIVE SUMMARY

1. In 2010 Waveney District Council Cabinet handed over the ownership of Beccles Lido to a Beccles Lido Ltd, a company with Charitable status, without additional cost to that group.
2. Beccles Lido provides an amenity that benefits the Beccles, East Suffolk and wider communities with a record 48,000 visitors in 2018 from the region and beyond.
3. The Lido saw a reduction in visitors in 2019 (45,000 visitors) and it was considered that the reduction in numbers was in part due to a deterioration in the main pool and its water quality, each of which are big drivers for the new project.
4. The Lido operates a concessions policy which includes discounted swimming fees, in 2019 this offered 31% discount for over 60's, Disabled, Benefits and Concessions. The Beccles Lido also offers free swimming for under 5's and a child rate for children aged 5-18 and Students, plus reduced-price season tickets offering better value for regular swimmers. The admission prices for 2020 will be set before the Lido re-opens in May 2020 and the Beccles Lido Management confirm that their pricing policy aims to align the admission fees with the cost of swimming at other pools in the area. The Lido aims to remain competitive for a swim, but cheap for a day out when compared with other tourist attractions. Often people choose to go to the Lido for the whole day which is different to usage at indoor swimming pools.
5. The project, which commenced in October 2019, will carry out the robust repairs and improvements that are needed to create a modern and efficient swimming pool able to be operated for longer opening hours and a longer season, and for many years to come.
6. The project will also allow the Lido to open for longer hours, a longer season and through the winter, allowing it to attract more visitors and different demographics of user (e.g. winter swimmers who will benefit from a safe environment in which to swim).
7. Applications for funding from the New Anglia Local Enterprise partnership (£46,000) and from Power to Change (£183,000) were refused, nevertheless, Beccles Lido Ltd have been successful in raising £423k of the funding required by the time the project needed to commence.
8. Beccles Lido Ltd have applied for £75k from District Community Infrastructure Funding (CIL) as they are short of this amount of their target to complete the project and open by May 2020. This amount represents approximately 18% of the funds required to deliver the project.
9. Whilst all applications for District CIL funding have been closed during the current review of the CIL Spending processes exceptional bids have been considered. Due the urgent

nature of this funding request the Cabinet Member for Planning and the Major Sites and Infrastructure Team have agreed to put this bid forward for Cabinet to decide as an exceptional case.

10. It should be noted that whilst the project has been supported through some funding by Beccles Town Council, no Neighbourhood CIL has been allocated by any of the local town or parish councils in the vicinity of the infrastructure. There also remains a question about the VAT position of the project (£86k) and a response is awaited from HMRC on this matter.
11. Cabinet are recommended to agree to fund the remaining £75k funding gap through District CIL. Given that this project has not previously been recognised as critical, essential or desirable infrastructure listed in the Waveney Local Plan, as an exceptional and beneficial project it has been tested against the draft CIL Spending Strategy also being considered at the Cabinet meeting. This includes applying the District CIL Application Assessment and Validation criteria (Appendix A) and the Principles of District CIL Allocations criteria (Appendix B)

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	Beccles and Worlingham
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<b>Cabinet Member:</b>	Councillor David Ritchie Cabinet Member with responsibility for Planning and Coastal Management
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<b>Supporting Officers:</b>	Ben Woolnough Major Sites and Infrastructure Manager 01394 444593 <a href="mailto:Ben.woolnough@eastsuffolk.gov.uk">Ben.woolnough@eastsuffolk.gov.uk</a>  Nicola Parrish Infrastructure Delivery Manager 01502 523057 <a href="mailto:Nicola.parrish@Eastsuffolk.gov.uk">Nicola.parrish@Eastsuffolk.gov.uk</a>
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## **1 INTRODUCTION**

### **Spending of Community Infrastructure Levy**

- 1.1 Both former Councils agreed, through Full Council, that decisions on what to spend District CIL on should be made through an annual programming process supported by an annually updated infrastructure plan. Recommendations on what to spend CIL on were made by each Council's Local Plan Working Group and the final decisions were made by each Council's Cabinet. The last Cabinet reports setting out planned awards of annual CIL funding were in September 2018 at the Waveney Cabinet and October 2018 at the Suffolk Coastal Cabinet.
- 1.2 Since becoming East Suffolk Council, a new Local Plan Working Group has been established, however within a recent review of CIL spending arrangements Cabinet will receive details of a new draft CIL Spending Strategy, for approval. This includes the recommendation to form a separate CIL Spending Working Group to deliver and operate the Strategy over the next three year period. Due to these circumstances this report has been prepared directly for Cabinet following consultation with the Cabinet Member for Planning. At present the wider annual CIL spending process has remained on hold pending the commencement of the new Infrastructure Delivery Manager in September and the establishment of a new structure for the East Suffolk CIL spend process, utilising the combined CIL collection funds from both the former Waveney and Suffolk Coastal Districts.
- 1.3 Under existing circumstances, the consideration of awarding CIL funding for individual projects outside of a round of bids is reserved for exceptional circumstances. Due to the specific circumstances of the Beccles Lido improvement project and the need for urgent funding to be received by the end of March 2020, it is appropriate to give consideration to this individual request outside of the normal process.

### **Beccles Lido Project**

- 1.4 Beccles Lido offers the community the ability to get fit, stay healthy and socialise, regardless of age, race, disability or economic status. The pool is used by serious and leisure swimmers, with regular daily lane swimming sessions. It also offers swimming lessons, aquacise and rookie lifeguard training; and all of the local primary schools use the pool for lessons. The Lido is available for private hire and also used by various swimming and sports clubs and for various other water-based activities (including triathlon, scuba diving and canoeing).
- 1.5 The project, which commenced in October 2019, will carry out the robust repairs and improvements that are needed to create a modern and efficient swimming pool able to be operated for longer opening hours and a longer season, and for many years to come. It will also allow the Lido to open for longer hours, a longer season and through the winter, allowing it to attract more visitors and different demographics of user (e.g. winter swimmers who will benefit from a safe environment in which to swim).

1.6 The project includes the following itemised costs:

Type of cost	£ excl VAT	incl.VAT £
Groundworks and pipeworks	£295,950	£355,140
Optional works now deemed essential & confirmed	£20,246	£24,295
Pool liner - Premier Plain liner + Deluxe Grade underlay	£55,528	£66,633
Pool surround – resurface	£22,000	£26,400
Pool railings	£15,827	£18,992
Construction Design Management (CDM)	£2,215	£2,658
Structural Design	£1,200	£1,440
Highly Desirable – replace Heat Exchangers (Having dismantled the 30-40 year old heat exchangers they are end-of-life; they can be refurbished but will still adversely restrict circulation flow/water quality. It is preferable to replace now.)	£18,600	£22,320
<b>Net Cost</b>	<b>£431,566</b>	
<b><u>VAT(20%)</u></b>	<b><u>£86,313</u></b>	
<b>Total Project Costs</b>	<b>£517,879</b>	<b>£517,878</b>

1.7 The VAT value is underlined because it is understood that where a charity is not registered for VAT, charities may still claim exemption from certain types of construction works. A query has been registered with HMRC specialist VAT Team to ascertain if these project costs can be claimed at £0 VAT rate or 5% VAT, as government guidance relating to this area is unclear and appears to indicate this could be a benefit open to the Beccles Lido Charity.

1.8 It should be noted that the amount of funding requested, £75K, is less than the VAT sum which may potentially be reduced or removed. Therefore, if VAT can be recovered there may be no funding gap to fill and no need for CIL funding. This position is reflected in the recommendation.

1.9 Beccles Lido is referred to within the emerging draft Neighbourhood Plan as the only swimming facility which serves the area. It is noted that the priorities in this draft Neighbourhood Plan include the provision of an indoor swimming facility to provide year-round facilities, with no reference to enhancing the existing facilities.

1.10 When considering the priorities for using District CIL funding to support projects, this project can be described as ‘Beneficial Infrastructure’ as it addresses a recently unexpected shortfall accounted for as having an influence on the sustainability of the Local Plan.

**Beccles Lido Funding Streams**

1.11 The District CIL Application from Beccles Lido Ltd included information of the current funding sources. Confirmation was also provided that funds from Beccles Town Council



were not Neighbourhood CIL funding (which has a 5 year spending deadline from receipt).

- 1.12 The amount of District CIL being sought represents 14.5% of the total project costs, including VAT.
- 1.13 Beccles Lido have submitted the following information on their collaborative funding sources for Beccles Lido improvements:

<b>Funding Source</b>	<b>Secured Yes/No</b>	<b>If not secured – when will you know</b>	<b>Amount £</b>
Garfield Weston Foundation	Yes		£147,000
Beccles Lido Reserves – accumulated since Lido acquired pool for replacing end-of-life plant and equipment	Yes		£33,594
Beccles Town Council	Yes		£2,000
East Suffolk Council – Exemplar	Yes		£10,000
Beccles Charitable Trust	Yes		£100,000
Sport England	Yes		£100,000
Community Fundraising – cash in bank	Yes		£30,232
Lido Fundraising - Beccles Beer Festival	Yes	Final total pending	£9,000
Community Fundraising – pledged	No	Assured pending project milestones	£1,000
East Suffolk Council – ECB (from Cllrs Brambley-Crawshaw, Elliott and Topping)	No	Verbal assurance	£10,000
<b>Amount being applied for from District CIL Fund</b>			<b>£75,000</b>
<b>Total Funding</b>			<b>£517,826</b>

- 1.14 Whilst it should be noted that no Neighbourhood CIL from the local town and parish councils in the vicinity of the infrastructure is being used to deliver the project, it represents a good demonstration of collaborative spend to deliver local infrastructure and for this reason should be viewed positively. Future CIL bids under the draft CIL Spending Strategy will be expected to demonstrate a similar approach and will clearly need to demonstrate a link to the Local Plan growth.

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

- 2.1 The CIL Spending Strategy and governance arrangements have many links to the East Suffolk Business Plan and the three-pronged strategy contained within it.
- 2.2 **Enabling Communities** – the introduction of CIL across the district ensures that local communities receive funds through the Neighbourhood CIL payments made in line with the CIL Regulations. These additional funds will further enable communities to feel proud of where they live and to support the services and infrastructure within their community.
- 2.3 **Economic Growth** – the CIL Charging Schedule was developed through detailed viability assessment of typical development seen across the district. Introducing CIL has not had an impact on the overall viability of development in the district and will generate funds

which must be used to support the delivery of the infrastructure requirements outlined in the Waveney and Suffolk Coastal Local Plans.

- 2.4 **Financial self-sufficiency** – the CIL Regulations allow for a local authority to retain some CIL funds to cover administrative costs. Retaining 5% of the CIL funds generated across the district will help cover the costs of administering the collection, allocation and spend of CIL and assist East Suffolk to become financially self-sufficient.

### **3 FINANCIAL AND GOVERNANCE IMPLICATIONS**

- 3.1 Where CIL is allocated to projects that are not detailed as critical, essential or desirable in the Local Plan there is a risk that there will be insufficient District CIL funds to deliver the infrastructure required to support the local plan. The right infrastructure may then not be provided in the right place at the right time.
- 3.2 In relation to the above matter, a separate paper has been submitted to request resource to deliver a fully functioning digital solution that will enable stakeholders to understand the level of District CIL available to deliver critical, essential and desirable infrastructure and to understand the amounts of Neighbourhood CIL that have been allocated or are due to be allocated to town and parish councils in the short term.
- 3.3 In the interim period discussions will continue with statutory infrastructure providers to ensure that the costing and timescales for delivering the critical and essential infrastructure are reviewed and known projects will feed into the annual Infrastructure Funding Statement, which a new legislative requirement under updated CIL Regulations.
- 3.4 Setting up and administering the CIL spend programme and governance arrangements is covered in existing budgets. However, as described in section 2, 5% of CIL receipts can be retained each year to help cover these costs.

### **4 OTHER KEY ISSUES**

- 4.1 This report has been prepared having considered the results of an Equality Impact Assessment EQIA162525425. No further actions are required. as Beccles Lido Ltd continue to monitor usage of the pools to ensure these are open and accessible to all users.

### **5 CONSULTATION**

- 5.1 No consultation has been necessary for this recommendation.

### **6 OTHER OPTIONS CONSIDERED**

- 6.1 Members have the option of not agreeing the District CIL funding for this project and retaining CIL funds for future use or deferring consideration of this bid as part of a more comprehensive round of bids in September 2020. These options would cause uncertainty over the delivery of the project and the ability for the works to be completed in time for re-opening in May 2020. Weight has been given to the value of this sports and recreation facility in supporting the major planned housing growth for this area and its loss would affect the sustainability of future growth and health and well-being of existing and new communities.

### **7 REASON FOR RECOMMENDATION**

- 7.1 This community led project is an important part of the local infrastructure provision in an area where there will be major planned growth for the future. As a community infrastructure project this represents a good example of a collaboratively funded project

to deliver a substantial community benefit. If full project costs, including the VAT, are considered the District CIL funding would represent 14.5% of the total costs. Despite not previously been recognised as infrastructure to be funded through developer contributions it is beneficial to the long term sustainability of growth in the area. In this instance the bid has been agreed as an exceptional beneficial project due to the project already progressing, the impact of the funding gap, the proportion of total funding and the community and health benefits the facility provides.

## RECOMMENDATIONS

1. That this exceptional case for an award of District CIL funding of £75,000 for the improvements to Beccles Lido is approved by Cabinet, as the CIL spending process review means bidding for District CIL funds remains closed for this year.
2. Where HMRC feedback or other research confirm that VAT could be applied to the project at 5% or £0 rate, the offer of £75,000 District CIL funding should be treated as recoverable forward funding pending final confirmation of the VAT position.
3. That the CIL funding is released to Beccles Lido Ltd on receipt of copy invoices confirming the full construction and plant (equipment) costs related to the funding gap.

## APPENDICES

<b>Appendix A</b>	District CIL Application Assessment and Validation criteria
<b>Appendix B</b>	Principles of District CIL Allocations criteria

## BACKGROUND PAPERS

Community Infrastructure Levy CIL Spending Strategy and Developer Contributions Service Plan – papers at same Cabinet meeting (report ES/0245)

## District CIL Application Assessment and Validation Criteria

### Project – Beccles Lido improvement bid

Reviewer: Nicola Parrish

Date completed: 16/12/19

Validation Criteria	Notes
All the questions on the District CIL Application form must be fully completed (where information known)?	Yes
Has the correct application form been used and has it been received within timescales?	Yes – Bid outside of Bid Process as currently closed
Costs and funding streams for provision are both clear and the sums add up? VAST position known?	Yes VAT position Questioned
The description of the infrastructure, location, purpose is clear?	Yes
Are the Benefits of the infrastructure clear?	Yes – some additionality noted
Is there housing or employment development in the area creating increased demand? Has this development commenced/ or is it preparing to commence? Is the application premature?	Yes – in the future  Premature but delivers on Health and Well Being
Is the proposed infrastructure <b>critical, essential or desirable</b> within the Local Plan Infrastructure Delivery Framework?	No - but clearly supports growth.

Validation Criteria	Notes
Is the proposed infrastructure detailed in a Neighbourhood Plan as a priority?  Are the parish council working towards a Neighbourhood Plan? What's the status? Has work been undertaken to understand infrastructure requirements?	N/A  <b>NP in draft – Indoor Swimming facilities detailed as a priority. Town Council not currently using NCIL towards this project but have provided £2k from precept.</b>
Where there is no neighbourhood plan has evidence been provided of a PIIP?	n/a
If the infrastructure is not detailed in the Local Plan Infrastructure Delivery Framework or in a Neighbourhood plan does it meet the criteria for “Beneficial” within the Priorities for Funding Infrastructure Projects Statement?	<b>YES - It answers positively 2 of the 3 questions –</b>
Has the project got Community Support – what evidence is provided of this? Is it adequate?	<b>Yes – there is evidence of support from the local council and from local groups in terms of fundraising</b>
Is it supported by the town or parish council (if not led by them)?	<b>Yes – some funding has been provided by Beccles Town Council – But not Neighbourhood CIL Funding</b>
Need /Justification? If there is existing infrastructure, do the proposals create additionality?	<b>The improvements should enable longer opening (after dark) as the main pool will have under-water lighting. New ladders and handrails etc will meet new H &amp; S standards. BLL to introduce extended opening hours and winter swimming</b>
Is the infrastructure capable of being used by the wider community?	<b>YES – also DDA compliant</b>
If the bid is over £50K, has a business case been submitted?	<b>BLL plan to increase annual reserve towards maintenance and replacement costs – reference was made to a business case but this has not been received in terms of understanding depreciation and budgeting for general maintenance moving forwards.</b>

Validation Criteria	Notes
Quotations for works/Quantity Surveyors costings supplied – must supply at least three or evidence of tender process (e.g. NHS and SCC have official tender programmes in place so will already have a nominated contractor)	<b>Quotes Provided and contract has already commenced</b>
How much financial support is sought from East Suffolk and for what?	<b>£75,000 towards project – 14.5% of total cost BUT if VAT is reclaimable this will be £86k</b>
Collaborative spend – yes/no and if yes give details? % of the whole Project cost requested?	<b>YES</b>
Who is leading on delivery? Has the right applicant applied for the funding?	<b>BLL</b>
Delivery proposal and timescales are detailed?	<b>YES – to be completed by May 2020</b>
Does the bid demonstrate an urgent need?	<b>YES – The pool could not open next year without funds and funding gap remains</b>
If the infrastructure needs planning permission - has this been sought and obtained?	<b>n/a</b>
Has any State Aid already been received or offered from other government sources? – If yes and more than 200eu indexed - complete state aid assessment	<b>Yes – but below thresholds</b>
Consideration of future funding/maintenance once project is complete? What/How funded?	<b>Yes – but no business case or operational plan yet received to quantify this</b>
Assessment of view of affordability from District CIL (after consideration of critical and essential expenditure and ringfencing requirements)	<b>Not in IDF, not a priority in the DRAFT Neighbourhood Plan and no NCIL has been allocated to the project. Infrastructure project offers additionality and is supporting an area where there is planned growth – meets Beneficial Criteria</b>

### Summary of Risks:

- District CIL is used where this is not required (e.g. due to the VAT position)
- There may be insufficient District CIL for other projects in the area, such a school or GP extensions to meet new growth coming forward. This cannot be assessed until new digital solutions enable this level of overview.
- Adequate funding may not be allocated to deliver replacement and ongoing maintenance of the whole Beccles Lido site.

**Type of Project:** ~~Essential Infrastructure/Desirable Infrastructure/Beneficial Infrastructure~~

This project clearly supports sporting, health and wellbeing activities which mostly meets the Beneficial criteria for providing infrastructure that will support planned growth in the area.

**Project – Beccles Lido improvement bid**

**In all cases to be considered favourably:**

a)	The infrastructure supports new housing and/or employment growth;	<b>YES</b>
b)	Timeliness (has the new housing the infrastructure is required to make sustainable commenced?);	<b>NO</b>
c)	The benefits of the infrastructure are clear;	<b>YES</b>
d)	The infrastructure is capable of being used by the wider community;	<b>YES</b>
e)	The infrastructure proposed represents value for money;	<b>YES</b>
f)	The infrastructure should be new or if being enhanced there must be some additionality in what facilities and/or services are being provided;	<b>YES</b>
g)	Deliverability can be demonstrated (e.g. feasibility has been completed and planning permission granted);	<b>YES</b>
h)	For local projects, the project has community support demonstrated through evidence of meaningful engagement;	<b>YES</b>
i)	Feasibility studies will only be funded when they form part of a fully costed project that has planning permission in place and is ready to be immediately delivered – feasibility studies alone do not produce infrastructure;	<b>n/a</b>
j)	Where the infrastructure is provided by a statutory partner, they agree the project is required and have the project tabled into their delivery plans;	<b>n/a</b>
k)	District CIL Funds are applied for by the infrastructure provider where this is delivered by or through a statutory partner such as Highways, Education, Health or Police;	<b>n/a</b>
l)	A business case is provided where funding over £50k is sought;	<b>NO - tba</b>
m)	A suitable package of measures has been identified which allow for funding of ongoing maintenance of the infrastructure in order to secure continued use;	<b>YES</b>
n)	The timing of delivery of the project is clear and payment stages are defined;	<b>YES</b>
o)	Costings must be clearly defined and evidenced based (3 quotes or quantity surveyors costings provided as applicable);	<b>YES</b>
p)	Where VAT can be claimed back this should be clear and discounted from costings;	<b>Query</b>
q)	All avenues for collaborative spend have been explored – e.g. grants, other government funding (locality monies, LEP, County Council, District, Parish), Neighbourhood CIL, community fundraising, retail shop match funding and crowd funding;	<b>YES</b>
r)	There is certainty around other funding sources;	<b>Yes - mostly</b>
s)	By releasing District CIL funding we can achieve infrastructure provision through collaborative spend (i.e. other grant funding, Community Partnership and locality funding, LEP/Government funding, Neighbourhood CIL, Crowd Funding/Donations);	<b>YES 14.5%</b>
t)	State Aid considerations do not inhibit the funding (projects where public funding is in excess of £200k);	<b>N/a</b>
u)	Affordability from District CIL funds (all essential and critical infrastructure needs are currently met by the CIL received from commenced developments);	<b>Not Tested</b>



## **Priorities for Funding Infrastructure Projects**

The following infrastructure types will be assessed accordingly together with the 'in all cases criteria' in the Principles of District CIL Spending section:

**Essential Infrastructure – will be planned for in CIL forecasting and will be considered first in bids**

<b>1</b>	It is infrastructure necessary to support allocated development in order that development carried out is sustainable	<b>NO – but is a recognised important part of sport and health provision for the town and area</b>
<b>2</b>	It is infrastructure necessary to support an approved development (proposed developments with planning permission granted) in order that development carried out is sustainable	<b>NO</b>
<b>3</b>	Is identified in the Infrastructure Delivery Framework of the Local Plans or is identified in the Neighbourhood Plan as a priority	<b>NO – but identified within the draft Neighbourhood Plan as an important asset to the town</b>
<b>4</b>	It represents key infrastructure (i.e. it is classified as critical or essential within the Infrastructure Delivery Framework of the Local Plan or the Neighbourhood Plan)	<b>NO</b>
<b>5</b>	The bid/identification of need must demonstrate that the time of delivery for funding is correct.	<b>NO</b>
<b>6</b>	It represents infrastructure detailed in the Infrastructure Funding Statement.	<b>N/A</b>

**Desirable Infrastructure – Will continue to be recognised in CIL spend forecasting and will be considered for bids on a case by case basis:**

<b>1</b>	The provision of this infrastructure addresses a current inadequacy in infrastructure terms and the benefits of the infrastructure are clear	<b>YES – the Lido offers a facility for school swimming lessons and health and well-being activities for the area.</b>  <b>The nearest indoor facility is in Bungay.</b>
<b>2</b>	The infrastructure is identified as 'desirable' in the Local Plan or Neighbourhood Plan	<b>NO – the Draft NP refers to the need for</b>

		<b>an indoor swimming facility</b>
<b>3</b>	Neighbourhood CIL funding has been allocated to fund the project	<b>NO – but the draft Neighbourhood Plan recognises the need to support tourist facilities</b>
<b>4</b>	It would allow infrastructure to be delivered through collaborative funding with district CIL being ‘the last piece of the jigsaw’	<b>YES</b>

**Beneficial Infrastructure – considered on a case by case basis and must meet one of the following:**

<b>1</b>	By provision of infrastructure it would unlock <b>further opportunities</b> within the District for housing and employment growth – e.g. the relocation of a Community Centre or similar infrastructure to a new building which would be mostly funded through the sale/re-use of the land as residential or business use and there are adequate facilities in the area to serve the development.	<b>NO</b>
<b>2</b>	It is infrastructure which has not previously been identified as essential or desirable in the IDF or Neighbourhood Plan, but a clear link can be identified in supporting the sustainability of the Local Plan.	<b>YES – the Lido offers a facility for school swimming lessons and health and well-being activities for the area.</b>  <b>The nearest indoor facility is in Bungay.</b>
<b>3</b>	It is infrastructure which addresses a recently unexpected shortfall in infrastructure or community provision accounted for as having an influence on the sustainability of a community in the Local Plan. - e.g. <i>closure of a pre-school facility and the need for a replacement.</i>	<b>YES – without the DCIL funding it could create a shortfall in sports provision in an area where there is planned growth</b>

### **District CIL does not fund**

The following should no longer be considered appropriate spend from District CIL:

- Up front funding for feasibility studies and professional fees where there is no guarantee that the infrastructure would be delivered;

- Infrastructure replacement or improvements in areas where there is no major developments commencing and limited growth;
- Infrastructure that is not supported by lead statutory bodies, for example, traffic calming or pedestrian crossings if these are not considered as required infrastructure by the Highways Authority
- Ongoing operational or maintenance costs; and
- VAT where this can be reclaimed

DRAFT



## CABINET

Tuesday 7 January 2020

### INFRASTRUCTURE TEAM SERVICE IMPROVEMENTS AND CIL SPENDING STRATEGY

#### EXECUTIVE SUMMARY

1. Developer Contributions, namely Community infrastructure Levy (CIL), Section 106 (s106) Agreements and Recreational Avoidance Mitigation Strategy (RAMS - Habitats Mitigation) payments are ways in which the council collects contributions for the provision of infrastructure and mitigation of the impact of development in our area. These are an expanding area of the Planning service's responsibilities and are now managed under the service's new Major Sites and Infrastructure Team. The Council retains 5% of CIL collected to cover its administration and further monitoring and pre-application charges are being explored to cover the service. The majority of housing development now requires CIL to be paid and where it is liable it still requires a process of administration. The pot of CIL the Council holds (District CIL) has now reached £13m and this increases the need for a new evidence led strategy to spend this on the necessary infrastructure across the District.
2. This report seeks approval of additional staffing resource for the team to undertake two key tasks; the implementation of new software (Exacom) to manage these contributions and provide greater public transparency, and; the implementation of a new CIL Spending Strategy informed by collection and priorities spending needs, including increased support for the spending of Neighbourhood CIL (NCIL).
3. The government has recently introduced new CIL legislation which provides for greater transparency around the recording and reporting of developer contributions for CIL and s106, including how it is spent. The Council is committed to embracing digital technology to improve service delivery for a wide range of internal teams and external stakeholders. The Ministry of Housing Communities and Local Government (MHCLG) has been looking at ways to obtain data on developer contributions (CIL and s106) from local authorities. The recent changes to the CIL Regulations have introduced a data standard and the requirement for an annual Infrastructure Funding Statement for developer contributions that requires information to be recorded, presented and shared in a set format.
4. The introduction of Exacom can be actioned as part of our existing Idox planning software contract and as an additional function, this physical introduction of software does not need to be a decision made by Cabinet. However, the implementation of Exacom will require

additional staffing resource to undertake data entry. Furthermore, an existing support position in the team, as a temporary secondment has proven essential to efficient CIL collection and it will be necessary to create a permanent CIL and s106 Support Officer post to ensure that CIL and s106 Officers can effectively manage both Exacom and the new CIL Spending Strategy.

5. A Public Facing Module (PFM) is included in the Exacom package, a 'bolt on' to the back-office system, which provides the interactive database for customer (public) access to developer contribution data. An example of this, having recently been implemented at Babergh and Mid Suffolk District Councils can be seen here: <http://pfm.exacom.co.uk/midsuffolkbabergh/cil.php> Those authorities not using Exacom are using a mixture of Excel spreadsheets and Access Databases.
6. In terms of the new CIL Spending Strategy, a draft strategy has been produced and is provided for approval as Appendix A of this report. The strategy is based on an evidence led approach, to be informed first of all by plan-led infrastructure spending priorities to ensure that the Infrastructure recognised in the Local Plans and Neighbourhood Plans is delivered. This will also be guided primarily by the infrastructure delivery timings of key infrastructure providers e.g. County Education Authority, Highway Authority and the NHS. Opportunities for other groups and bodies to bid will still exist but they will be assessed under a structured approach based on the links it has to growth, level of priority and benefits.

Is the report Open or Exempt?	Open
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<b>Wards Affected:</b>	All
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<b>Cabinet Member:</b>	Councillor David Ritchie Cabinet Member with responsibility for Planning and Coastal Management
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## 1 INTRODUCTION

### CIL - Current Position

- 1.1 The government has recently introduced new CIL legislation which provides for greater transparency around the recording and reporting of developer contributions for CIL and s106, including how it is spent.
- 1.2 The recent changes to the CIL Regulations have introduced a data standard and the requirement for an annual Infrastructure Funding Statement for developer contributions that requires information to be recorded, presented and shared in a set format.
- 1.3 With the adopted Waveney Local Plan and the emerging Suffolk Coastal Local Plan, the development of East Suffolk as a single District Council and changes in legislation it has been recognised that resources were required to develop a new team as part of the Planning Policy and Delivery Team to focus on the collection of developer contributions, the consideration and delivery of major sites and the delivery of the right infrastructure, in the right place and at the right time.
- 1.4 East Suffolk currently utilise the Uniform program and spreadsheets to manage CIL. The benefits of this are that other teams and users of Uniform are able to look for CIL data and understand the position on a case, but in terms of financial management and reporting for CIL this is entirely managed through spreadsheets and is always approximately a minimum of 1 month in arrears with information being verified via the Finance Team. Dealing with phone calls and providing information on the CIL financial position is inefficient. Meeting statutory targets to make Neighbourhood CIL payments is prolonged through this being an entirely manual process. Understanding the position of CIL, in terms of funds which should be prioritised to provide infrastructure that makes the development sustainable, is not an activity which has been given attention. It must be given priority to ensure that CIL Spending is appropriate and will ensure delivery of the infrastructure within the Infrastructure Delivery Frameworks and that infrastructure which makes the proposed developments sustainable in planning terms.
- 1.5 The total CIL Liability Notices issued to date comes to approximately £35m and the council has collected approximately £13m (to 31 October 2019). Of the collected CIL Funds, the Council has distributed £1.9m in Neighbourhood CIL and has allocated £2.4m to local projects. Going forward the CIL Collected against liabilities of consented development may not be as high as this initial liability position, however all CIL liability needs to be managed. This includes dealing with self build exemption and other relief and circumstances which reduce CIL liability.
- 1.6 Calculating CIL and allocating the statutory splits of CIL, including making the Neighbourhood CIL payments, is a manual process that is supported through the use of Excel and formulae. Plan measuring has only recently utilised latest software to maximise and benefit from evidence based electronic measuring techniques.
- 1.7 Recent changes in legislation effective from 1 September 2019 will increase the level of surcharges applied, will change the approach to inflation indexation, require information to be recorded and reported in a certain way and add further complexity.
- 1.8 Currently resources are focussed on CIL collection and achieving signed s106 legal agreements that are linked with approved developments. There are limited opportunities

for the team to undertake proactive monitoring of commencements, management of debt recovery and the allocation and spending of CIL.

- 1.9 When a house is being sold/purchased solicitors are required to do various land charges searches. A Con 29 search, which is a paid for service, provides specific information in relation to CIL and any CIL Notices that may be relevant to the property. Con 29 search data and responses are provided through the Land Charges Team, but currently the data to support this is collated manually by the Infrastructure Team, and this process is time consuming.
- 1.10 Currently Liability Notices and Demand Notices and other CIL documentation and communications are manually produced. These are scanned in and held on Information@Work.
- 1.11 The statutory CIL admin fee (5% of CIL received) is currently spent on a planning service wide basis. The intention is for the Infrastructure Team to be largely funded through the CIL admin receipts so that this directly correlates to the work undertaken within the team. This will be further enhanced by reinstatement of the s106 monitoring fees as soon a funding structure for these is established, together with pre-app fees for CIL and a portion of the legal fees where agreements are drafted by the CIL and s106 Officers.

#### **S106 – Current Position**

- 1.12 East Suffolk currently utilise a system called Dataflex to manage s106 Agreements. The data however is held on two separate databases for Suffolk Coastal and Waveney data. The system has never been comprehensively populated or fully utilised in terms of recording and monitoring individual obligations and it is now very old and no longer supported by IT. The system doesn't record a lot of the data that would be required to respond to s106 FOI and EIR enquiries or to provide government statistical returns. Even without Exacom additional resources will be required next year to provide extensive developer contribution data for the government that complies with the latest data standard.
- 1.13 FOI and EIR requests related to s106 have increased recently and further impact on the resources within the Infrastructure Team as these are time consuming to gather the data to report back. Some which may be generated by the press or for research purposes may find a simple self-service response from other authorities with a public facing database, whilst it may take several hours for East Suffolk officers to produce a response and in some cases multiple days.
- 1.14 Since there is not a comprehensive system that manages s106 agreements this means responding to Solicitors enquires (made as part of conveyancing for house purchases) is time consuming, manually intensive and creates a further demand on team resource.
- 1.15 Currently most s106 agreements are redacted and scanned into the 'Information@Work' system, however, s52 agreements which pre date 1990 have not been scanned in. Whilst a copy of the agreement can be seen or downloaded, this does not provide an immediate compliance picture which then has to be manually established and reported to any enquirers. Enquiries occur frequently via conveyancing solicitors, private enquirers and researchers.
- 1.16 Those historic agreements that are scanned in and redacted have not been redacted in compliance with the latest GDPR requirements (signatures and initials data is still

viewable). They are also very large files which are not easy to search and extract detail from.

- 1.17 Where solicitors' enquiries relate to a s52 agreement this means that the original deed must be obtained, and a copy taken and then it must be reviewed in order to ascertain the compliance position. This is currently a time-consuming task for a CIL and s106 Officer to action.

## **2 SERVICE IMPROVEMENTS**

- 2.1 As part of the requirements of an annual Infrastructure Funding Statement it will be necessary for the council to accurately report on how has spent and how it intends to spend the CIL it collects each year. This places a greater emphasis on the council demonstrating that the 5% of CIL that it collects for administration of CIL is spent on that purpose. The best use of CIL admin funds is to demonstrate that it is being used to make the service more efficient and better placed to resource the substantial infrastructure needs that CIL must fund over future years. In 2018/19 the 5% CIL retained by the former councils amounted to £231K. This new requirement will draw together the need to comprehensively improve the way that the Council reports on CIL and s106 income and expenditure, and how it intends to spend the District CIL funds to deliver essential infrastructure. This requirement and expanding demands of managing CIL and s106 increases the need for expanded resource in the team and a clear strategy for the service.
- 2.2 Critical in this is the introduction of a comprehensive public facing database to manage CIL and s106. The Uniform Planning system is not able to be used effectively for monitoring compliance and issuing developer contribution notices, nor can it be used to manage CIL spending. The software company, IDOX, who own the Uniform software, recommend using the Exacom software to manage developer contributions and they have developed a "connector" interface which allows data to be shared across systems that can be linked to Exacom (so data is shared between Planning, Land Charges, Building Control, Finance and the Infrastructure Team). This software is being installed within the Idox suite of functions as an expansion of the existing package and therefore is not subject to a new procurement process.
- 2.3 The Finance Team are looking at updating the current Navision finance package and are keen to encourage data sharing between the Exacom system and the Capita payments system and Navision. This should offer efficiencies for both Finance and Infrastructure Teams (reducing reconciliation burdens, speeding up the reconciliation process and being able to provide customers with accurate current data). Furthermore, there may be other opportunities to maximise investment opportunities when larger sums of CIL are received.
- 2.4 A pre-application service is currently not available for advice on CIL and at present the lack of a system for estimating CIL and the impact of exemptions and relief cannot be delivered within current resources. This is a lost opportunity for the service to better fund the resources it puts into advising the public and developers.
- 2.5 A review of s106 and CIL cases has identified a need to give extra attention to compliance with GDPR particularly with data being more publicly accessible.
- 2.6 The newly formed Infrastructure Team has 3 part time CIL and s106 Officer posts and a seconded (temporary) full time Support Officer post, plus the Infrastructure Delivery Manager post (FT). Once the secondment ends (February 2020) the administration of the



current CIL collection process would compromise the ability for officers to implement Exacom and the new CIL spending strategy.

- 2.7 Customers and key stakeholders (as identified in *Appendix A*) are not able to see current information on the levels of CIL income and expenditure, including amounts due and amounts allocated to parish councils (Neighbourhood CIL) and the amount of funding currently held and allocated By the council on approved infrastructure projects. There is no transparency and limited information available to the public in relation to CIL income and Expenditure. Importantly parish councils cannot presently plan for how much Neighbourhood CIL they are set to receive.
- 2.8 Customers are not able to 'self-serve' and access information for themselves other than searching and viewing documents via the planning portal on an individual basis. Some of this information in terms of CIL is restricted (GDPR) and provision of it should be via a paid for land charges search. FOI and EIR requests further impact on the resources within the Infrastructure Team as these are time consuming to gather the data to report back.
- 2.9 Management are not able to readily view the current financial position of CIL without manoeuvring around spreadsheets and totalling various balances. Furthermore, the financial position is reconciled in arrears and so there is a minimum of a 28-day time lag between the point at which the financial position is clarified and the verification of daily transactions.
- 2.10 New legislative requirements will mean the whole area of developer contributions recording will require improvement and enhancing and this will include revision of webpages and the way data is reported on all developer contributions.
- 2.11 All of this improvement will create a far superior evidence base to inform how CIL is spent and how we can effectively enable delivery of infrastructure projects of varying scales through both District CIL and Neighbourhood CIL. It will allow contributions which are due to paid to be tracked and planned for further in advance than is currently the case. It will also make it much easier to identify where developments are building out to predict the infrastructure demands to fund relevant infrastructure in coordination with the uplift in populations in each area.
- 2.12 The proposed system and service improvements are considered an essential part of the CIL spend strategy. The reorganisation of CIL collection and spend into a single team also enables CIL and s106 Officers to take greater ownership of the whole CIL process and will ensure a more joined up approach to collection and spend, with a swifter transfer of funds to town and parish councils for Neighbourhood CIL and infrastructure providers where the District CIL fund delivers infrastructure projects

## **IMPACT ON OPERATIONS**

- 2.13 Additional resource would be required to deliver a fully operational digital system (Exacom) and this would also include resources to ensure that s106 and s52 deeds have been scanned in and appropriately redacted to comply with GDPR legislation and that back data for both s106 and CIL has been entered into the modules and fully reconciled before the Exacom PFM could be switched on and the efficiencies across a number of teams gained from this part of the project.
- 2.14 Early in the implementation of Exacom, a decision should be made as to whether it would be appropriate and cost effective for s52 (pre 1990) agreements to be populated into the

new system. It may also be appropriate to work backwards in inputting s106 agreements or focus on the larger ones first.

- 2.15 Opportunities may exist to utilise current in-house scanning resources to support the GDPR compliance part of this project with potential for the staff to also input data. Opportunities may also exist to utilise Planning Apprentices to support part of the project.
- 2.16 Resource would be required within the Affordable Housing Team to ensure that affordable housing data was input and then maintained as an ongoing arrangement as developments are approved, moving forwards. In the long term this will be of substantial benefit to the housing team for monitoring s106 affordable housing obligations.
- 2.17 Resource would be required from Finance to ensure that the Exacom system can share data effectively with Capita income systems and the main financial system for financial reporting. In the long term this will be of substantial benefit to the finance team and reduce work required in invoicing for CIL and processing collections.
- 2.18 The ICT Team will need to commit a project manager to this software implementation and have already scoped the project and appraised the requirements for its implementation. There is existing ICT resource to support this project.
- 2.19 The Infrastructure Team (and other employees providing support for data input and financial verification) would be trained in populating and utilising any new systems. Opportunities already exist as the newly appointed Infrastructure Delivery Manager has worked for two pilot authorities implementing Exacom, s106, Projects and PFM Modules. They have also worked closely with both the software suppliers and Ministry of Housing, Communities and Local Government (MHCLG), looking at the new data standard for developer contributions and understanding the future direction in terms of data which MHCLG will require from local government. In fact, the data standard for Developer Contributions is now published and the requirement to provide the information in this format is built into the legislative guidance. Previous experience exists within the team for data recording and transfer of data and of s106 records, however capacity among officers is very limited for extensive data and information entry.
- 2.20 Some data may be electronically transferred utilising the Uniform Connector, if there are skills within the ICT department that can support development of this at the front of the project. Early test to test environment can establish how this can operate.
- 2.21 In order to make most effective use of existing skilled CIL and s106 Officers undertaking day-to-day CIL collection and spending duties, it will be necessary to temporarily expand the team to build and populate the Exacom database. It is therefore proposed to create two fixed term (2 years) full time posts as CIL and s106 Data Entry Officers. These two posts should be up to Band 3 to ensure that individuals could be recruited with adequate data entry skills and the ability to independently interrogate documents for the essential details including financial records. It is unlikely that the two posts would be required beyond the two-year period unless implementation suffers from unexpected delays or a further change in legislation.
- 2.22 The combined cost of the two temporary positions for two years would be a short-term total cost of £111k. The new permanent position would have an additional cost of £28.5k per annum. The permanent post has to be considered over the Medium-Term Financial Strategy (MTFS)

period (current financial year, plus next three years) as a cumulative total and this amounts to £114k. Funding of these posts is covered further into the report.

**2.23 Implementation of a new developer contributions database with a public facing module would provide the following opportunities:**

- a) A searchable record of 20+ years of legal agreements and the obligations relating to these.
- b) A fully searchable record of CIL transactions and live time data in terms of collection, allocation and where possible expenditure. This will inform better evidence led CIL spending and enable close tracking of infrastructure needs and expected growth in households creating the need to spend CIL effectively.
- c) Data held in an easy to access system which is searchable/viewable online so that stakeholders (Councillors, Parish Councils, Solicitors, Landowners, Developers, County Council and other councils, internal teams and the public) can view progress of receipt of funding and delivery of infrastructure associated with new development in an area.
- d) A system which allows customers to interrogate the information further and print or save the data for reference at another time.
- e) A system which is current and operates in “real-time” or as close as this can be allowing for the previous days transactions to be included.
- f) Full transparency of developer contributions finance in line with the Governments Transparency Agenda.
- g) A one stop shop – data can be recorded here for Affordable Housing delivery – which units, what tenure and status making it possible to run reports for statistical reporting and monitoring.
- h) Financial reconciliation is faster and less resource intensive and the requirement to raise separate invoices for CIL and s106 would be removed.
- i) Responses to a Con 29 land charges search will be electronically provided at the push of a button – this would benefit resources within both the Land Charges Team and the Infrastructure Team.
- j) Data will be presented in line with the governments new data standard for developer contributions and will complement the production of the annual Infrastructure Funding Statement.

**2.24 Introduction of Exacom and the draft CIL Spending Strategy will create the following efficiencies:**

- a) Faster response times for enquiries from solicitors with an eventual move to self-service for this information.
- b) The ability to share data across several teams without having to log out of and maintain different spreadsheets or limp along using obsolete systems.
- c) A single point of information of developer contributions for all stakeholders.
- d) Self-service for Councillors, Parish Councils and other stakeholders wanting to know how much Community Infrastructure Levy (CIL) or s106 funding is available (so a reduction in these enquiries).
- e) Self-service for any FOI/EIR and solicitors enquiries relating to developer contributions transactions and compliance.
- f) Wider efficiencies could be gained by providing the service across several local government organisations or geographical areas (future benefits/alignment).
- g) Real time data and the ability to support customers immediately with relevant information to hand.

- h) A quicker and clearer understanding of the financial position regarding District CIL income relating to specific sites and areas to enable timely planning and delivery of infrastructure – for example, understanding the number of sites commenced in a school or GP surgery catchment area.
- i) A clearer understanding of the amount of Neighbourhood CIL allocated and spent across the parish or area to support collaborative project delivery – e.g. for health, education, opens space, play, etc.
- j) Evidence of spend and allocation to deliver infrastructure projects. Customers can see what infrastructure is being delivered and how this is being paid for through CIL.

**A snapshot review of some actions undertaken by the team in the past month, which would no longer be necessary with Exacom is provided:**

<b>Activity</b>	<b>Average monthly time spent in last month</b>
FOI and EIR requests	6 hours
Solicitors Enquiries (s106)	12 hours (depending on if a housing provider is selling off stock)
Neighbourhood CIL Enquiries	4 hours – can be more at NCIL payment periods
District CIL Enquiries	5 hours
Internal s106 Enquiries	3 hours
CON 29 searches	3 hours
Other – time spent calculating interest, surcharges, writing Liability Notices, Demand Notices and other CIL Notices, indexing, making NCIL Parish Payments, CIL Debt recovery, searching receipt of CIL monies, etc Including time spent by other Teams such as Land Charges, Finance, Housing, etc	Average of 12 hours
<b>Potential monthly saving</b>	<b>45 hours</b>

**2.25 The proposals contained in this report should deliver the following benefits for the Council and our customers:**

- a) One system; fully reconciled, fully transparent.
- b) Electronic transfer of data between systems, reducing data input time and error (Uniform (Planning Applications), TLC (Land Charges) and NAVISION (Finance).
- c) Real time data reporting – data on the Public Facing Module (PFM) is no more than 24 hours old.
- d) Able to view and present data at a number of levels – parish, ward, former district, district and community area (where possible to develop).
- e) Faster decision-making.

- f) Effective monitoring through monitoring and reporting tools.
- g) CIL and s106 records uploaded to the cloud.
- h) GDPR compliance for Developer Contributions.
- i) Electronic reporting on specific areas - e.g. for RAMS and Affordable Housing.
- j) More effective support for customers/stakeholders.
- k) Futureproofing for further legislative changes and MHCLG data reporting requirements.
- l) Delivery of the right infrastructure in the right place and at the right time.
- m) Reduced risk of non-delivery of critical and essential infrastructure.
- n) Plan/growth led infrastructure delivery programme relating to evidenced need.
- o) Increase in collaborative spending for infrastructure.
- p) One stop shop for information on developer contributions.
- q) Data complies with latest data standards and can be shared electronically.
- r) Closer working with statutory bodies and other infrastructure delivery partners to ensure infrastructure projects are understood, fully costed and deliverable before District CIL is applied for.
- s) Obtaining best value for CIL funded projects and ensuring this is affordable from CIL Funds.

**2.26 In not undertaking the recommendations of this report the following could result in the following risks:**

- a) The benefits of utilising technology are not realised/resources are not used efficiently or effectively.
- b) Failure to meet the council's digital transformation objectives; the governments transparency agenda and information reporting requirements moving forwards.
- c) Failure to effectively allocate and spend CIL or s106 funds such that if we do not secure investment in infrastructure (schools, health, broadband, transport etc.), then development is stifled and/or unsustainable. This includes the subsequent risk of having to return s106 funds not spent within required deadlines.
- d) Failure to monitor development such that CIL and s106 contributions are not collected in a timely manner.
- e) Failure to monitor development such that CIL is not collected in a timely manner.
- f) Failure to monitor expenditure such that CIL or s106 expenditure is not effective.
- g) Failure to comply with legislative requirements through not realising the benefits of technology and reducing the risk of errors and inadequate data management.
- h) Failure to deliver a developer contributions service through inadequate resourcing and lack of service improvements.
- i) Risk to loss of data held in obsolete and unsupported systems.
- j) Risk of errors, incorrect data and inaccurate reporting – wasted resources correcting information and dealing with potential complaints. Subsequent risk of damage to reputation.
- k) Non-compliance of GDPR and CIL legislation.

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

**3.1 The project would meet the following council objectives:**

**Enabling Communities** – Communities will be able to see the amount of Neighbourhood CIL funding allocated to them and expected to be received within the next two years and can

plan to deliver local projects that support vibrant and healthy communities – e.g. sporting and recreational facilities, village halls, open space, etc. Communities will be able to better understand the developer contribution benefits materialising from growth and what this has/may deliver in infrastructure. Better and more efficient infrastructure delivery will be achieved through better management.

**Economic Growth** - Communities will be able to see where homes are being approved for development, the infrastructure funding this will bring and the infrastructure which will be delivered to support the growth. CIL funds will be spent more efficiently where it can have the greatest benefit.

**Financial Self Sufficiency** – Utilising technology frees up valuable resource and allows key tasks to be delivered that otherwise are not actioned. It also allows for focus on delivery of infrastructure and support for community project development with alignment of other funding streams and opportunities to gain more collaborative funding, e.g. crowd funding. Being able to maximise investment opportunity of CIL funds. By providing a web-based solution that supports internal teams to provide their service and externally provides transparency of developer contribution income and spend data for a wide range of stakeholders. The improved process will ensure better use of 5% retained admin CIL and ensure it is invested back into the Infrastructure team effectively.

#### 4 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 4.1 The cost of the Exacom software and its annual licence can be met within the existing IT budget and as an expansion of our existing contract with Idox it is not subject to any procurement requirements or decision making on its introduction. The cost of the software and licence are modest and easily addressed within the 5% of CIL which is reserved for administration of the service.

Over the past 3.5 years the 5% CIL admin retained by the Council (s) has amounted to:

2016/17	£66,316
2017/18	£146,644
2018/19	£231,522
2019 to 30 Sept	£160,110

- 4.2 The actual set up cost is the that of time and resource to populate Exacom with the data and information from historic s106 agreements and CIL collected and spent over the past 6 years. This is therefore reflected in the cost of the two 2-year data entry officer positions and the conversion of a current secondment position into a permanent position. As it is anticipated that the project could be completed within 2 years the cost of the three positions over that period amounts to £139,500.
- 4.3 As mentioned, it is a requirement for the Council to retain 5% of CIL collected to spend on the administration of CIL. This includes its collection, spending, administration of Neighbourhood CIL, enforcement and the CIL charging examination process. Previously the use of this 5% amount has not been itemised against elements of the service. From the 2020/21 financial year this amount will be itemised against the specific work and costs of the CIL team with an intention of demonstrating a largely self-funded operation. This may

also be supplemented by potential future CIL pre-application charging and s106 monitoring and administration fees.

- 4.4 The use of the 5% CIL admin funding must be reported in the first Infrastructure Funding Statement (IFS) in December 2020 and this will be produced and agreed by the CIL Spending Working Group. The IFS would then be reported annually to Cabinet and the Local Plan Working Group for information.

## **5 OTHER KEY ISSUES**

- 5.1 This report has been prepared having considered the results of an Equality Impact Assessment EQIA163077948. No further actions are required.

## **6 CONSULTATION**

- 6.1 No consultation has been necessary for this recommendation.

## **7 OTHER OPTIONS CONSIDERED**

### **In respect of the implementation of Exacom**

- 7.1 Do Nothing - This would involve no purchase costs of system, which has already recognised is of limited effect. Staffing savings would be made but additional expense incurred in the long term through unnecessary tasks being performed manually to achieve the same outcomes as Exacom. Also see above section on risks.
- 7.2 Introduce Exacom without any additional staffing resource - This would considerably impact on existing officer time. It would result in a compromised CIL service, poor customer service, lost CIL through possible mistakes and limited resource to undertake recovery of unpaid CIL. Full roll out of CIL would take longer and result in inadequate reporting of CIL collection and spend.

### **In Respect of the CIL Spending Strategy**

- 7.3 Do Nothing – This would require the previous process to continue, utilising Local Plan Working Group and a case-by-case basis of reviewing bids for CIL. This would be more time consuming and risks CIL being spent on less essential infrastructure and without a full evidence-based picture of infrastructure needs and cost. It may result in a shortfall in CIL to spend on larger future essential projects.
- 7.4 Undertake improvements to the spending strategy but operate on a bid led basis. Therefore, only confirming/ringfencing spend when bids are received. This would fail to demonstrate a good management of CIL funds and would provide less confidence that CIL will enable infrastructure recognised as being required at Local Plan and planning application stages.

## **8 REASON FOR RECOMMENDATION**

- 8.1 The content of this report and recommendations demonstrate how the recently formed Major Sites and Infrastructure Team has performed on the recommendations for its formation to Full Council in November 2018 to deliver a comprehensive improvement to the way in which the growth and infrastructure needs of the District and its communities can be addressed. The improved management of developer contributions by the Infrastructure arm of the team has already commenced allowing an increasing workload and expanding CIL collection and spend to be efficiently addressed. This will be further improved and maximised through the digital enhancements provided by Exacom, including

greater transparency, and additional team resources will allow efficient roll out to meet public and government expectations. The draft CIL spending strategy will ensure that the CIL held and collected over future years will be spent where it is most required in order to deliver infrastructure projects to best support planned growth. This will therefore achieve the sustainable development objectives which underpin our Local Plans.

#### **RECOMMENDATIONS**

1. That the introduction of the Exacom software be noted and that the staffing resource required to implement the Exacom project and service improvements over a two-year period (as set out at paragraph 2.22) be agreed.
2. That the Draft CIL Spending Strategy and Terms of Reference for the CIL Spending Working Group be agreed, to enable the governance of spending District CIL funds and receive recommendations for the projects to be funded and reported in the annual Infrastructure Funding Statement.

#### **APPENDICES**

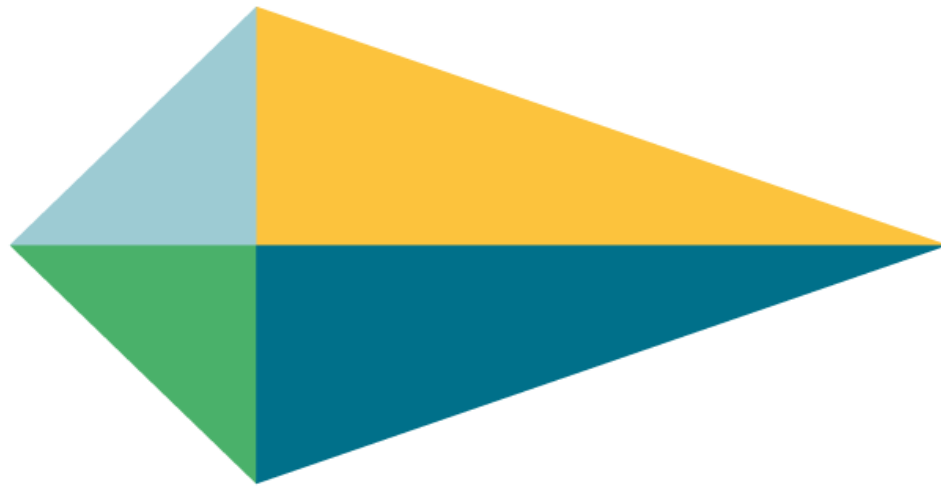
<b>Appendix A</b>	Draft CIL Spending Strategy
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#### **BACKGROUND PAPERS - None**



# Community Infrastructure Levy (CIL) Spending Strategy

ES/0245



**EASTSUFFOLK**  
C O U N C I L

***“the right infrastructure, in the right place, at the right time”***

V4 – 18.12.2019

Major Sites and Infrastructure Team

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## 1. Background

- 1.1 The Community Infrastructure Levy (CIL) was adopted in the former Waveney District area on 1st August 2013. In the former Suffolk Coastal District area, CIL was adopted on 13 July 2015. Since then the councils have collected approximately £12.4m of total CIL.
- 1.2 The National picture for CIL is that £4.5bn CIL has been collected to date by CIL Charging Authorities and they have spent £1.5bn.
- 1.3 It is important to note that whilst the District CIL fund can be collecting £millions, it can take just a couple of infrastructure projects, such as expansion of Health or Education provision to empty the fund. Spending of District CIL needs to be planned, for a number of reasons, namely to deliver the right infrastructure, in the right place and at the right time.
- 1.4 CIL is paid on commencement of planning permissions that are CIL liable development. Payments are usually made in instalments and can take up to 2 years to be received in full. Once received the CIL payments are automatically split down into their statutory “pots” or funds: 5% Admin; 15%\* or 25% to parish councils and the remainder to the District CIL Fund (former 123 Fund). \*Where town or parish councils do not have a made Neighbourhood Plan the 15% is capped at £100 (indexed) per council tax dwelling.
- 1.5 Under the CIL Regulations, the Neighbourhood CIL is passed to the town and parish councils every 6 months; 28 April and 28 October. Only Neighbourhood CIL amounts received in the previous 6 months can be passed on, so areas where there is no new development commencing and thus paying CIL will not receive any Neighbourhood CIL. Parish councils have 5 years from the date of receipt to spend the Neighbourhood CIL. Where there is not a parish council then the funds are held and spent in consultation with the community and under the same terms as the town and parish councils spend.
- 1.6 Currently 10 Neighbourhood Plans have been made which allows these parish councils to receive 25% Neighbourhood CIL from planning permissions that are granted on or after the “made” date. There are a further 27 Neighbourhood Plans in progress with one of currently at referendum stage. This will mean that the amount of CIL passed to parish councils for local infrastructure projects will increase considerably over the plan period. This is excellent news in terms of there being funds passed direct to parish councils for them to deliver their priority projects in their areas, however it does have an impact on the level of District CIL available to deliver larger critical and essential infrastructure projects such as school extensions and extensions to GP services.
- 1.7 Since CIL has been adopted in East Suffolk, over £1.9m has been passed to parish and town councils through Neighbourhood CIL Payments (**Appendix A**). There is greater flexibility for parish councils spending in the CIL Regulations, although any unspent Neighbourhood CIL still held after 5 years from the allocation date must be returned to

East Suffolk. Under the CIL Regulations East Suffolk would then spend this CIL to support the new development in the area of the local council(s).

- 1.8 Parish councils can choose to fund projects collaboratively where local infrastructure priorities are shared with East Suffolk, other parish councils or other infrastructure providers, such as Health, Police, Highways or Education. The CIL Regulations state that parish councils can spend their Neighbourhood CIL on:-
- (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or
  - (b) anything else that is concerned with addressing the demands that development places on an area.
- 1.9 Discussions have commenced to explore how the Council may enable a collaborative funding approach within the Community Partnerships. This would enable more to be achieved with Neighbourhood CIL, together with other grants and funding mechanisms and could address local infrastructure needs which are not confined to parish boundaries.
- 1.10 Where town and parish councils have a Neighbourhood Plan made in their area, the expectation is that Neighbourhood CIL is prioritised and spent to deliver the projects identified in the Neighbourhood Plan. This may mean that in some areas where the Neighbourhood Plan has identified strategic infrastructure, such as health or education as a priority infrastructure requirement, there will be the opportunity to collaboratively fund projects of this nature.
- 1.11 For those town and parish councils receiving 15% Neighbourhood CIL, they should consider the infrastructure needs of their area using a Parish Infrastructure Investment Plan (PIIP) to help understand and prioritise their needs and focus spend.
- 1.12 CIL expenditure processes have been under review during 2019 as a result of both the creation of East Suffolk Council and following the recent changes in the CIL Regulations that affect CIL collection, spending and reporting as from 1 September 2019. The Planning Practice Guidance on the GOV.UK website has also been updated to further explain how CIL should be managed under the new CIL Regulations.
- 1.13 An outcome of this review has been the need to revise the approach to spending District CIL funds (Former Reg 123 Funding) and to put in place new processes and controls to ensure the effective management and transparency around reporting on CIL, and all developer contributions. The previous CIL spending process related to the formative years for CIL and was an open opportunity to fund local projects, especially during a period where not much Neighbourhood CIL had yet been paid out to town and parish councils.

- 1.14 To date East Suffolk has formally allocated over £2.4m of District CIL to a variety of local infrastructure projects across the two former district areas. This represents approximately 35% of the District CIL received up to the end of September 2019. **Appendix B** details the amounts approved and allocated to infrastructure projects, expenditure made to date and delivery status.

## **2. The CIL Expenditure Review**

- 2.1 CIL should be viewed as a method to mitigate and support growth and therefore its collection and spending is linked to a plan-led approach.
- 2.2 The CIL expenditure review began by looking at the revised CIL legislation and the emphasis placed within the National Planning Policy Framework (NPPF) and the updated Planning Practice Guidance. There is a golden thread linking the requirements for how CIL can and should be spent with the critical and essential infrastructure identified within the local plan infrastructure delivery frameworks.
- 2.3 The review summarises the requirements within **Appendix C** and details the actions linked to these requirements. Below are the points learned from the existing approach and from the review of the latest legislative requirements:
- a) District CIL is different to Neighbourhood CIL: Firstly, it must be focussed on those critical and essential projects identified in the Infrastructure Delivery Frameworks attached to the Local Plans. If we do not do this the risk is that the development coming forward will not be sustainable in planning terms. Secondly, there is no spending deadline for District CIL, and it may take a number of years to collect enough funds for projects as they come forward if they come forward ahead of the growth. The key element to support delivery of timely infrastructure is monitoring commencements and sharing data with infrastructure providers. This is the start of the conversation, once infrastructure needs are identified as part of the local plan, neighbourhood plan and through the planning permission process.
  - b) The recent changes in the CIL Regulations, supported by the NPPF and Planning Practice Guidance emphasise the need to spend developer contributions (CIL and s106) to ensure that development is **sustainable in planning terms**. There is now a legislative requirement for the Council to produce and publish an Annual Infrastructure Funding Statement which details those projects which the Council is collecting District CIL towards and planning to deliver in the short term, together with details of the expenditure for the financial year in relation to both s106 and CIL. The first Annual Infrastructure Statement must be published by 31 December 2020.
  - c) Previously CIL was collected and spent in line with Regulation 123 Lists; a list of generic infrastructure types. Some CIL charging authorities took this list a step

further through the identification of specific projects to be funded by CIL. The new CIL Regulations remove Regulation 123 and the infrastructure lists which detailed the types of infrastructure which CIL would support and requires all councils in receipt of any kind of developer contribution to record and report on these in a particular way. The Infrastructure Funding Statement places a greater emphasis towards the projects identified from the growth detailed in the Local Plan, which then feed into the Infrastructure Funding Statement. This ultimately means a greater focus on working with statutory infrastructure providers to work up the projects needed to deliver the critical, essential and desirable infrastructure indicated through the Local Plan, Neighbourhood Plans and also identified through planning applications.

- d) To date the Council has formally allocated approximately 35% of the District CIL Pot to local projects, many of which are not identified in the infrastructure Delivery Frameworks of the Waveney Local Plan and the emerging Suffolk Coastal Local Plan and to continue to spend District CIL in this manner would put at risk the delivery of critical and essential infrastructure identified in the Local plan as essential to support new development.
- e) The emerging East Suffolk draft business/strategic plan refers to “evidence led spending of CIL to support growth”. Local plan and Neighbourhood Plan projects are evidence led, but those projects that sit outside of this must be able to demonstrate their link to supporting the sustainability of the Local Plan development.
- f) Where projects have been offered District CIL Funding, many of these have not been “oven ready” schemes and therefore this can tie up District CIL that otherwise could be allocated to critical or essential infrastructure projects that may be delivered in a quicker timeframe and have more urgent and evidenced need.
- g) In the past, District CIL has been allocated to fund feasibility costs of proposed infrastructure. A feasibility study may not always identify a desirable and affordable solution and thus deliver infrastructure. These costs should therefore only form part of a project cost where the project is oven ready and deliverable. The criteria for validating and prioritising District CIL Spending should consider this.
- h) The new CIL Spending Strategy must prioritise and safeguard District CIL for recognised infrastructure to support growth. There is a risk that the past practice of funding local projects diminishes the projected funds and would leave developments without necessary infrastructure.
- i) Some of the historic projects we have allocated District CIL Funds to are not progressing and have not yet been delivered. This means funding is tied up that

could otherwise be allocated to a project that is deliverable, is included in the infrastructure delivery framework and will directly support the new housing developments in the area.

- j) The allocation of CIL to infrastructure projects is not about 'even geographical share' but must be proportionate in the way that infrastructure projects are funded where new housing and retail growth has commenced in areas and infrastructure needs have been identified in the Local Plan, Neighbourhood plan and through the planning process.
- k) The new CIL Spending Strategy must prioritise the allocation of District CIL funds to infrastructure projects that will make development within the local plan sustainable in planning terms and be deliverable in the short term. Prioritisation will ensure projects are deliverable in the short term (i.e. "oven ready" or "demonstrably deliverable") and are ready to be included on the annual Infrastructure Funding Statement (a new requirement of the CIL Regulations). This would mean projects are worked up, fully costed and have the necessary planning permissions in place before they reach the point of approval for District CIL funding.
- l) East Suffolk have allocated just short of £2m NCIL funds to town and parish councils since April 2016. By ensuring the District CIL is spent as intended, to make development sustainable where developments have commenced in a an area, this encourages town and parish councils to look at their local infrastructure needs and to plan delivery of local projects using their Neighbourhood CIL to maximise/benefit from other funding streams such as grants, local funding and crowd funding. It should be noted that the CIL Regulations give town and parish councils 5 years from the date of receipt in which to spend Neighbourhood CIL.
- m) The new CIL Regulations place new demands in relation to recording developer contributions and reporting on both s106 and CIL. As a result of this, and to meet the Councils business aims of providing information and services more digitally, we need to procure, implement and deliver a digital solution in order to be an efficient and effective service and to meet the new statutory requirements.
- n) The digital solution for managing developer contributions will enable the council to safeguard District CIL Funds towards projects identified in the Infrastructure Funding Statement as priority projects for the short term. The allocation of funds in this way will require periodic review and annual reporting on the "approved projects" that will be the focus of the Infrastructure Funding Statement. In this way the public, developers, infrastructure providers, local councils and other key stakeholders will be able to understand the infrastructure that is being delivered through developer contributions. The system publicly presents the amount of unspent or uncommitted CIL that the Council holds. It is important to recognise

that large infrastructure projects will require CIL to be built up over a period of time and the Council is not unnecessarily “holding onto CIL”.

### 3. The new CIL spending process

- 3 \_ Future District CIL spend will need to focus on the critical and essential infrastructure already identified through the local plan and communicated within the planning process. A process will need to be developed to ensure that District CIL Funding is secured or ringfenced to deliver these projects in a timely manner. **Diagram 1** indicates the cyclical nature of this review process through to when a project is detailed as ‘funded’ in the Infrastructure Funding Statement and then delivered.
- 3.2 The CIL Spending process will ensure that the priority projects for District CIL funding are identified and communicated within the Infrastructure Funding Statement, which is now a new requirement under the updated CIL Regulations 2010 (as amended).
- 3.3 The first Infrastructure Funding Statement must be produced and published by 31 December 2020.
- 3.4 **Diagram 1** shows the cyclical nature of funding and delivering infrastructure that is required through the Local Plan only. **Diagram 2** depicts the process we would expect all projects seeking District CIL to follow.

**Diagram 1**

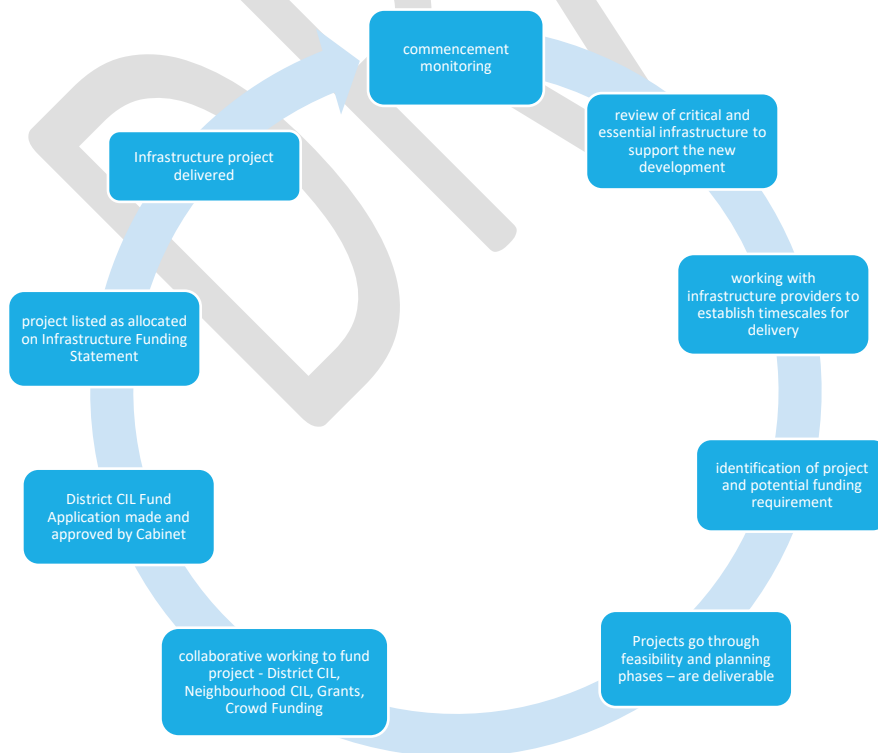
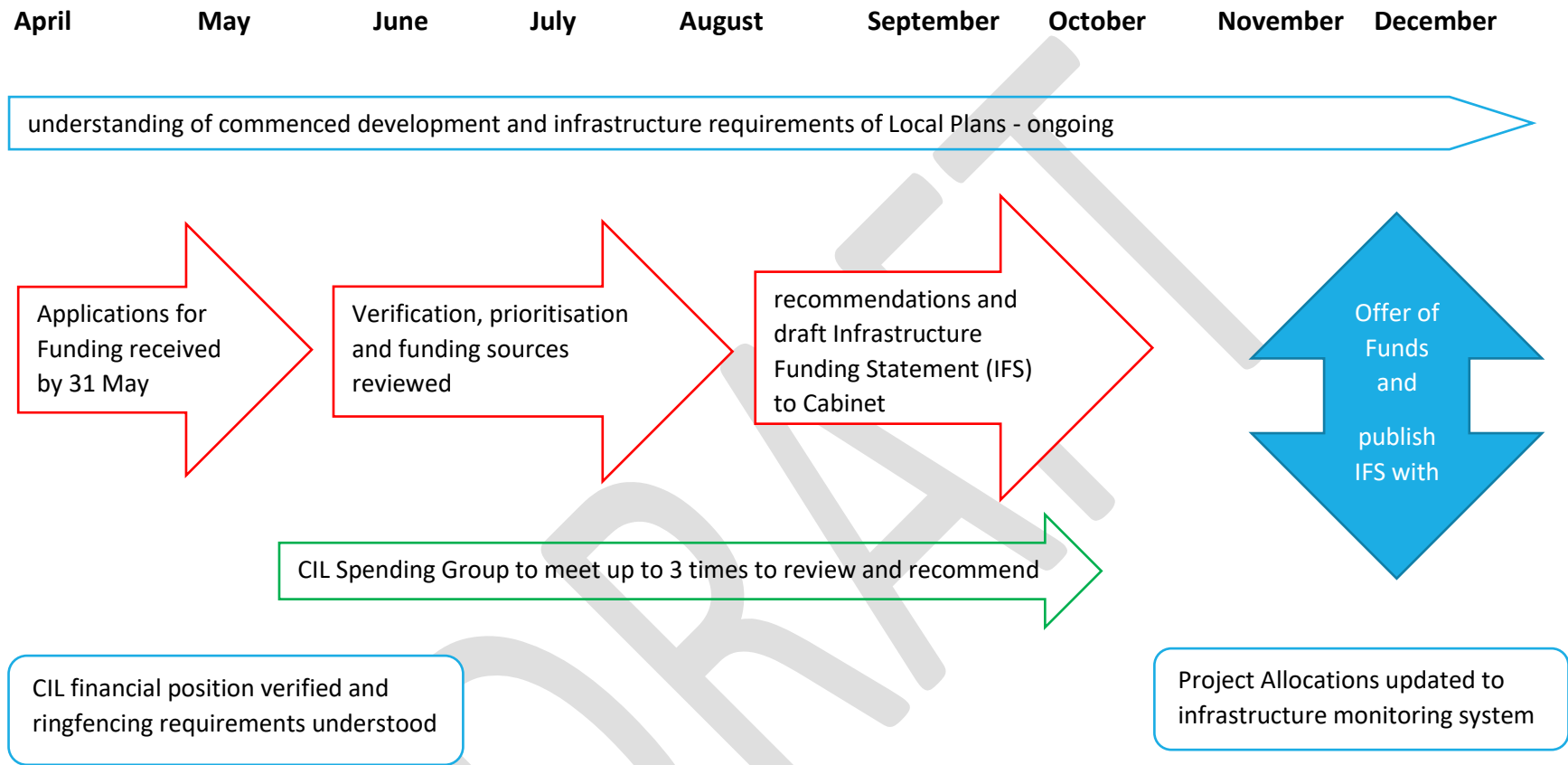




Diagram 2



#### **4. Principles of District CIL Allocations**

##### **4**

4.1 There are a few key principles to bear in mind when considering applying for funding from District CIL. **In all cases to be considered favourably:**

- a) The infrastructure supports new housing and/or employment growth;
- b) Timeliness (has the new housing the infrastructure is required to make sustainable commenced?);
- c) The benefits of the infrastructure are clear;
- d) The infrastructure is capable of being used by the wider community;
- e) The infrastructure proposed represents value for money;
- f) The infrastructure should be new or if being enhanced there must be some additionality in what facilities and/or services are being provided;
- g) Deliverability can be demonstrated (e.g. feasibility has been completed and planning permission granted);
- h) For local projects, the project has community support demonstrated through evidence of meaningful engagement;
- i) Feasibility studies will only be funded when they form part of a fully costed project that has planning permission in place and is ready to be immediately delivered – feasibility studies alone do not produce infrastructure;
- j) Where the infrastructure is provided by a statutory partner, they agree the project is required and have the project tabled into their delivery plans;
- k) District CIL Funds are applied for by the infrastructure provider where this is delivered by or through a statutory partner such as Highways, Education, Health or Police;
- l) A business case is provided where funding over £50k is sought;
- m) A suitable package of measures has been identified which allow for funding of ongoing maintenance of the infrastructure in order to secure continued use;
- n) The timing of delivery of the project is clear and payment stages are defined;
- o) Costings must be clearly defined and evidenced based (3 quotes or quantity surveyors costings provided as applicable);
- p) Where VAT can be claimed back this should be clear and discounted from costings;
- q) All avenues for collaborative spend have been explored – e.g. grants, other government funding (locality monies, LEP, County Council, District, Parish), Neighbourhood CIL, community fundraising, retail shop match funding and crowd funding;
- r) There is certainty around other funding sources;
- s) By releasing District CIL funding we can achieve infrastructure provision through collaborative spend (i.e. other grant funding, Community Partnership and locality funding, LEP/Government funding, Neighbourhood CIL, Crowd Funding/Donations);

- t) State Aid considerations do not inhibit the funding (projects where public funding is in excess of £200k);
- u) Affordability from District CIL funds (all essential and critical infrastructure needs are currently met by the CIL received from commenced developments);

## **5. Priorities for Funding Infrastructure Projects**

### **5**

- 5.1 In order to understand which infrastructure should be prioritised for funding from District CIL it is necessary to develop a prioritisation framework. In this way the council will be able to consider those projects that have not been captured in the Local Plans or Neighbourhood Plans. Where town or parish councils have a 'made' Neighbourhood Plan and they receive 25% of the CIL collected from commenced development, this funding should be prioritised towards the infrastructure highlighted within the Neighbourhood Plan and should also support the infrastructure in the Local Plan where this is a shared priority, for example for Health and Education infrastructure.
- 5.2 The following infrastructure types will be assessed accordingly together with the 'in all cases criteria' in the Principles of District CIL Spending section:

#### **Essential Infrastructure – will be planned for in CIL forecasting and will be considered first in bids**

- It is infrastructure necessary to support allocated development in order that development carried out is sustainable.
- It is infrastructure necessary to support an approved development (proposed developments with planning permission granted) in order that development carried out is sustainable.
- Is identified in the Infrastructure Delivery Framework of the Local Plans or is identified in the Neighbourhood Plan as a priority.
- It represents key infrastructure (i.e. it is classified as critical or essential within the Infrastructure Delivery Framework of the Local Plan or the Neighbourhood Plan)
- The bid/identification of need must demonstrate that the time of delivery for funding is correct.
- It represents infrastructure detailed in the Infrastructure Funding Statement.

#### **Desirable Infrastructure – Will continue to be recognised in CIL spend forecasting and will be considered for bids on a case by case basis:**

- The provision of this infrastructure addresses a current inadequacy in infrastructure terms and the benefits of the infrastructure are clear

- The infrastructure is identified as 'desirable' in the Local Plan or Neighbourhood Plan
- Neighbourhood CIL funding has been allocated to fund the project
- It would allow infrastructure to be delivered through collaborative funding with district CIL being 'the last piece of the jigsaw'

**Beneficial Infrastructure – considered on a case by case basis and must meet one of the following:**

- By provision of infrastructure it would unlock **further opportunities** within the District for housing and employment growth – e.g. the relocation of a Community Centre or similar infrastructure to a new building which would be mostly funded through the sale/re-use of the land as residential or business use and there are adequate facilities in the area to serve the development.
- It is infrastructure which has not previously been identified as essential or desirable in the IDF or Neighbourhood Plan, but a clear link can be identified in supporting the sustainability of the Local Plan.
- It is infrastructure which addresses a recently unexpected shortfall in infrastructure or community provision accounted for as having an influence on the sustainability of a community in the Local Plan. - *e.g. closure of a pre-school facility and the need for a replacement.*

## **6. District CIL does not fund**

6.1 As well as being clear about what CIL should be used for it is equally as important to be clear about what District CIL cannot fund. The following should no longer be considered appropriate spend from District CIL:

- Up front funding for feasibility studies and professional fees where there is no guarantee that the infrastructure would be delivered;
- Infrastructure replacement or improvements in areas where there is no major developments commencing and limited growth;
- Infrastructure that is not supported by lead statutory bodies, for example, traffic calming or pedestrian crossings if these are not considered as required infrastructure by the Highways Authority;
- Ongoing operational or maintenance costs; and
- VAT where this can be reclaimed.

## **7. Governance Arrangements**

7.1 A representative group from across the council will work with Major Sites and Infrastructure Officers to review applications for District CIL and to ensure that the CIL Spending Strategy operates in line with the processes further detailed. The following key points relate to this group.

- Meetings will be held up to 3 times per year and projects pushed forward to Cabinet for approval in September each year;
- Additional attendance to meetings of this group will be at the sole invite of the Chair;
- The CIL Spending Group is not a forum for presentations from potential funding applicants, promotion of local projects by either members of the group or substitute or other invited member attendance;
- The CIL Spending Group is not a forum for appeals against District CIL funding decisions.
- All District CIL funding decisions are final.

7.2 A copy of the draft proposed Terms of Reference for the CIL spending Group are held as **Appendix D.**

## **8. Operation of the CIL Spending Strategy:**

8

### **Year 1 of CIL Spending Strategy (April 2020 to March 2021):**

1. In order to understand the scale of developments commencing in this period and the likely CIL receipts from this income, and to focus spend on immediately deliverable essential infrastructure, the first year of the CIL Spending Strategy should not fund “Desirable” and “Beneficial” Infrastructure.
2. Year 1 will also allow time to understand the likely timescales for delivery of essential infrastructure and the impact on current District CIL funds, through close working with infrastructure providers.
3. CIL Spending Group to monitor Neighbourhood CIL Spending and be aware of non-compliance and clawback position and to assist in promotion of spend and reporting compliance and timeliness of spend.
4. CIL Spending Group to monitor completion of the first Infrastructure Funding Statement, setting the template for delivery of this moving forwards.
5. Agreeing the ring-fencing and spend on infrastructure projects put forward for approval that will go into the Infrastructure Funding Statement.

### **Year 2 of CIL Spending Strategy (April 2021 to March 2022):**

1. CIL Spending Group to review types and nature of both Desirable and Beneficial Infrastructure and level of windfall development to understand if amounts in this category are going to put delivery of Essential Infrastructure at risk.
2. CIL Spending Group to consider if a ceiling level of funding or % restriction should apply to amounts allocated to Desirable and Beneficial Infrastructure.
3. Review of progress of projects that have been allocated District CIL.
4. Establish a local projects pot for Community Projects that would support growth.

### **Year 3 of CIL Spending Strategy (April 2021 to March 2023):**

1. Review of progress of projects that have been allocated District CIL.
2. Review of ringfencing, validation and prioritisation process
3. Review of affordability and the appropriateness of the CIL Spending approach and recommendation of changes to Cabinet\*

\*Where there are changes to legislation and guidance that require an earlier review this will be moved into the relevant period.

## **9. Documentation, Validation and Review**

- 9.1 Where applications are made by statutory infrastructure providers, such as Police, Health, Highways and Education these should not require further evidence of value for money since procurement frameworks are reviewed ensuring best value is achieved. The expectation is that the projects form part of the relevant organisation's Capital Programme. Furthermore, these bodies are also required to report on the use of developer contributions for transparency.
- 9.2 Where applications are made by local councils and other community or charitable bodies, these will have slightly greater information requirements in order to ensure best value is obtained, to be clear on funding sources and to further understand State Aid implications.
- 9.3 Downloadable District CIL Fund application forms will be held on the CIL Spending webpages, together with a template for a business plan.
- 9.4 It is important that applications (or bids) for District CIL Funds are robust and relate to projects that are "oven ready" and all avenues for collaborative funding have been explored (this is particularly in the case of desirable and beneficial infrastructure). If further information is required, a failure to provide this in a timely manner may delay the bid from validation and prioritisation. Where information is not provided by deadlines set within this process the bid likelihood that a bid is rejected will be increased. Occasionally bids may be held over for the next funding year, if the application is likely to

meet the prioritisation criteria but lacks a small amount of information. The decision by the CIL Spending Group to reject or hold over a bid will be final.

- 9.5 The validation template attached as Appendix E will be used to assess whether the project can be put forward for a funding decision.
- 9.6 The prioritisation template attached as Appendix F will assist in understanding if the infrastructure meets the requirements for funding from District CIL.
- 9.7 Where bids are rejected an explanation will be provided in writing to the applicants.
- 9.8 Application supporting documents relating to invalid applications that have been rejected will only be retained for a 2-year period, with the exception of the application form, validation checklist and decision notes which will be retained for a 7 year period after completion of final District CIL funding allocation for the project.

## **10.Promotion and Communication of the Strategy**

- 10.1 The CIL Spending Strategy will be available via the councils Spending CIL webpages. The Strategy will be promoted to key stakeholder groups and internal teams.

<b>Type</b>	<b>Interest</b>	<b>Influence</b>	<b>Action</b>
Cabinet	High	High	Annual update for Infrastructure Funding Statement and periodic update via CIL Spending Group feedback
Ward Councillors	High	High	Promote through member training on CIL
Parish Councillor	High	High	Promote through Parish Liaison Workshops in January 2020
Finance Team	High	Low	Promote through internal comms and CIL CPD Training
Planning Teams	High	High	Promote through internal comms and CIL CPD Training
Land Charges	High	Low	Promote through internal comms and CIL CPD Training
Managers	High	High	Promote through internal comms and CIL CPD Training
CEO/Directors	High	High	Promote through internal comms and CIL CPD Training

Building Control	Medium	Low	Promote through internal comms and CIL CPD Training
Solicitors	Medium	Medium	Available via Spending CIL webpages
House Purchasers	Medium	Low	Available via Spending CIL webpages
Agents	High	Low	Use Developer Forum to promote
Developers	High	Low	Use Developer Forum to promote
Community Groups, Public	Medium	Low	Available via Spending CIL webpages
Press	Medium	High	Available via Spending CIL webpages – Separate promotion of Projects on delivery

## **11.Key Contacts**

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## **Appendices**

### **Appendix A: Neighbourhood CIL Payments**

<b>Parish</b>	<b>Total (£)</b>
Aldeburgh	25,395.00
Alderton	-
Aldringham-Cum-Thorpe	897.21
Badingham	7,490.70
Barnby	-
Barsham & Shipmeadow	-
Bawdsey	-
Bealings - Great	-
Bealings - Little	-
Beccles	46,843.34
Benacre (Parish Meeting)	-
Benhall & Sternfield	16,618.27
Blaxhall	-
Blundeston	760.09
Blyford & Sotherton	-
Blythburgh	5,078.25
Boulge (Parish Meeting)	-
Boyton	-
Bramfield & Thorington	7,713.26
Brampton with Stoven	692.43
Brandeston	-
Bredfield	-
Brightwell Foxhall Purdis Farm	2,076.51
Bromeswell	-
Bruisyard	-
Bucklesham	9,794.79
Bungay	6,929.65
Burgh (Parish Meeting)	-
Butley, Capl St Andrew & Wantisden	-
Campsea Ashe	187.28
Carlton Colville	23,935.13
Charsfield	-
Chediston, Linstead Magna, Linstead Parva	-
Chillesford (Parish Meeting)	-
Clopton	-
Cookley & Walpole	-
Corton	1,829.91

Covehithe (Parish Meeting)	-
Cransford (Parish Meeting)	-
Cratfield	-
Cretingham, Hoo, Monewden	7,277.58
Dallinghoo (Parish Meeting)	-
Darsham	1,005.67
Debach (Parish Meeting)	-
Dennington	318.88
Dunwich (Parish Meeting)	-
Earl Soham	4,384.26
Easton	31,510.95
Ellough, Shadingfield, Sotterley & Willingham	1,039.77
Eyke	-
Farnham	-
Felixstowe	62,109.76
Flixton - The Saints Ward	-
Flixton Lothingland Ward	4,856.50
Framlingham	607,107.55
Friston	14,047.35
Frostenden, Uggleshall & South Cove	2,942.37
Gisleham	6,441.20
Glemham - Great	-
Glemham - Little	-
Grundisburgh & Culpho	932.03
Hacheston	4,495.00
Halesworth	70,097.50
Hasketon	-
Hemley (Parish Meeting)	-
Henstead with Hulver Street	-
Heveningham	6,030.99
Hollesley	2,262.00
Holton	1,181.83
Homersfield	-
Huntingfield	-
Iken	-
Ilketshall St Andrew	-
Ilketshall St John (Parish Meeting)	-
Ilketshall St Lawrence	-
Ilketshall St Margaret (Parish Meeting)	-
Kelsale	1,803.67
Kesgrave	29,664.71
Kessingland	51,987.01
Kettleburgh	-

Kirton & Falkenham	3,666.64
Knodishall	11,530.90
Leiston-Cum-Sizewell	52,762.01
Letheringham	-
Levington & Strattn Hall	-
Lound	192.33
Lowestoft	85,648.28
Marlesford	1,024.90
Martlesham	35,072.10
Melton	329,195.28
Mettingham	-
Middleton	1,597.80
Mutford	1,087.31
Nacton	6,447.74
Newbourne	1,449.04
North Cove	495.44
Orford & Gedgrave	1,091.27
Otley	-
Oulton	793.49
Oulton Broad	23,770.00
Parham	-
Peasenhall	-
Pettistree	-
Playford	-
Ramsholt (Parish Meeting)	-
Redisham (Parish Meeting)	-
Rendham	-
Rendlesham	19,788.02
Reydon	7,219.96
Ringsfield & Weston	1,527.88
Rumburgh	-
Rushmere (Parish Meeting)	-
Rushmere St Andrew	3,940.17
Saxmundham	38,967.90
Saxtead	-
Shottisham	-
Sibton	-
Shadingfield	1,139.85
Snape	5214.47*
Somerleyton, Ashby & Herringfleet	-
Southwold	44,791.95
Spexhall	-
South Elmham All Saints & St Nicholas	1,306.89

South Elmham St James (Parish Meeting)	15.44
South Elmham St Cross	
South Elmham St Margaret	
South Elmham St Michael	
South Elmham St Peter	
Stratford St Andrew	-
Sudbourne	475.06
Sutton	-
Sweffling	-
Swilland & Witnesham	5,318.32
Theberton	-
Trimley St Martin	12,308.97
Trimley St Mary	54,771.99
Tuddenham St Martin	-
Tunstall	-
Ubbeston	-
Ufford	1,147.51
Walberswick	4,865.02
Waldringfield	-
Wangford with Henham	-
Wenhaston	-
Westerfield	32,231.89
Westhall	-
Westleton	-
Wickham Market	8,240.44
Wissett	275.25
Woodbridge	69,928.68
Worlingham	5,855.22
Wrentham	18,023.49
Yoxford	5,624.79
<b>TOTAL</b>	<b>1,966,542.09</b>

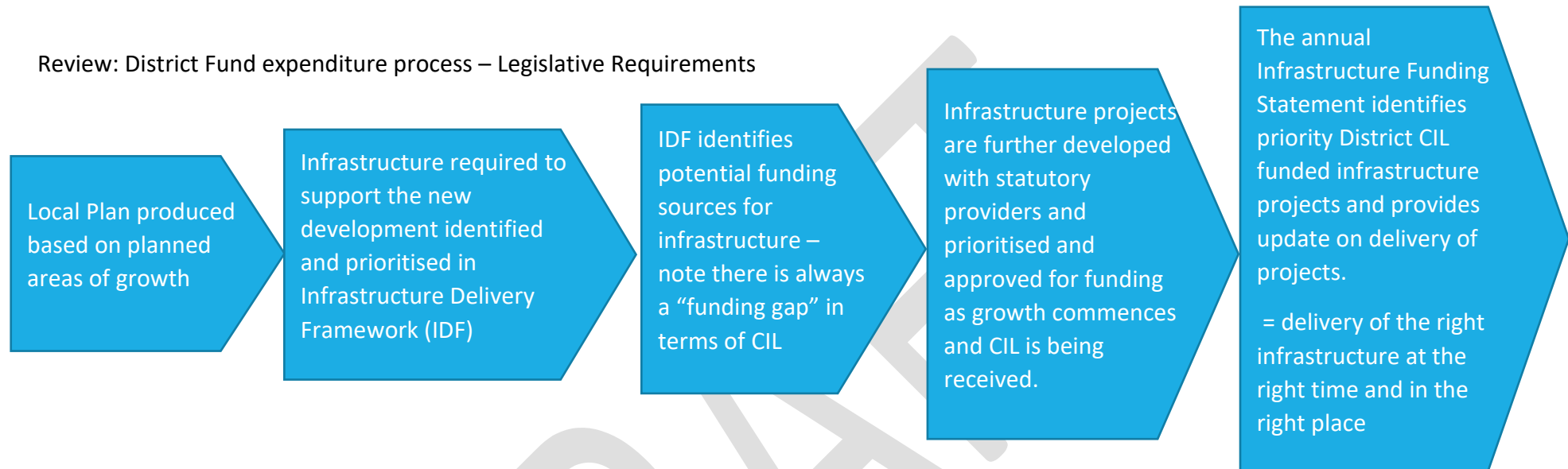
\* Subject to a £27 clawback

## Appendix B: Amounts approved and allocated to infrastructure projects

Year	Description	TYPE	Allocated	Expenditure to 31/03/19	Balance	
2017/18	Framlingham Medical Centre extension	Health	£122,400.00	£122,400.00	£-	
2018/19	Beccles Town FC - 3G Pitch	Open space and leisure	£74,500.00	£74,500.00	£-	
2018/19	Ufford Recreation Ground Car Park Resurface	Open space and leisure	£3,000.00	£3,000.00	£-	
2018/19	Trimley St Mary - pedestrian Crossing	Highways	£45,000.00	£45,000.00	£-	
2018/19	Lowestoft - Royal Green Play Equipment and footpath improvements	Open space and leisure	£ 123,500.00	£123,500.00	£-	
2018/19	Easton & Letheringham Village Hall Refurb	Community facilities	£38,000.00	£27,084.56	£10,915.44	Cr*
2018/19	Woodbridge - Jetty Lane Community Centre	Community facilities	£ 188,800.00	£-	£188,800.00	
2018/19	Deben Estuary - Renovation of Flood Defence Wall Flood Cell 01	Flood and water management	£ 126,200.00	£-	£126,200.00	
2018/19	Worlingham Community Facility	Community facilities	£70,000.00	£-	£70,000.00	
2018/19	Beccles - Repair of moorings at Beccles Quay	Community facilities	£74,500.00	£-	£74,500.00	
2018/19	Lowestoft - Normanston Pedestrian and Cycle Bridge	Highways	£120,000.00	£79,870.31	£40,129.69	
2018/19	Bungay Community Centre	Community facilities	£366,460.00	£-	£366,460.00	
2018/19	Framlingham - St Michael's Rooms Community Centre	Community facilities	£700,000.00	£-	£700,000.00	
2018/19	Framlingham - Walkway Routes	Highways	£55,000.00	£-	£55,000.00	
2018/19	Halesworth - Footpath Hill Farm Road	Highways	£56,002.50	£-	£56,002.50	
2018/19	Lowestoft - East of England Park	Green infrastructure	£88,000.00	£-	£88,000.00	
2018/19	Rushmere St Andrew, Playford Road Traffic Calming	Highways	£45,200.00	£-	£45,200.00	
2019/20	Worlingham Community Facility	Community facilities	£149,478.00	£-	£149,478.00	
			£-	£-	£-	
			<b>£2,446,040.50</b>	<b>£475,354.87</b>	<b>£1,959,770.19</b>	
	* Underspend: CIL Returned to District CIL Fund					

## Appendix C: Legislation and Guidance Review: Requirements and actions

Review: District Fund expenditure process – Legislative Requirements



<p><b>NPPF - 19 February 2019</b></p>	<p><b>2. Achieving sustainable development</b></p> <p>7. ‘The purpose of the planning system is to contribute to the achievement of sustainable development.’</p> <p>8 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) <b>an economic objective</b> – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p>	<p><b>Actions:</b></p> <p><b>Planning Services</b></p> <p>Infrastructure needs are identified through planning consultation process in relation to major development (10 dwellings and over) and through the local plan process.</p> <p>Systems established to monitor commencement of major developments and to ringfence District CIL to ensure delivery of Key Infrastructure that is critical or essential to support the increase in demand.</p> <p>Infrastructure provided in a timely manner, to support growth and enable local access to services and open space.</p>
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	<p>b) <b>a social objective</b> – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) <b>an environmental objective</b> – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>Where it is possible to improve existing infrastructure to increase capacity, this must be more energy efficient and sustainable.</p>
<p><b>CIL Regulations 2010 (as amended)</b></p>	<p><b>PART 7. Application to infrastructure</b></p> <p><b>59</b> (1) A charging authority must apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area.</p> <p>(3) A charging authority may apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure outside its area where to do so would support the development of its area.</p> <p><b>Annual infrastructure funding statements</b></p> <p>121A.—(1)Subject to paragraph (2), no later than 31st December in each calendar year a contribution receiving authority must publish a document (“the annual infrastructure funding statement”)</p>	<p><b>The Infrastructure Team</b></p> <p>It should be noted that CIL Spending priorities will depend on commencements, cumulative impacts and the delivery timescales of infrastructure partners. Where possible opportunities to maximise the application of CIL will be sought to ensure Neighbourhood CIL and other funding sources help to deliver local infrastructure with a collaborative spend approach. In this way we will be able to deliver more and the benefit from CIL will be wider.</p> <p><b>The Infrastructure Team</b> will produce the annual Infrastructure Funding Statement which will include detail of those infrastructure projects that are considered critical and essential to be delivered in the short term as housing development related to the area commences.</p>

	<p>which comprises the following—</p> <p>(a) a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL (other than CIL to which regulation 59E or 59F applies) (“the infrastructure list”);</p> <p>(b) a report about CIL, in relation to the previous financial year (“the reported year”), which includes the matters specified in paragraph 1 of Schedule 2 (“CIL report”);</p> <p>(c) a report about planning obligations, in relation to the reported year, which includes the matters specified in paragraph 3 of Schedule 2 and may include the matters specified in paragraph 4 of that Schedule (“section 106 report”).</p> <p>(2) The first annual infrastructure funding statement must be published by 31st December 2020.</p>	<p>As new technology is introduced, some of this information will be provided via a dedicated interactive Developer Contributions Database in order to provide transparency of Infrastructure Funding financial information on a “real time” basis.</p>
<b>National Planning Practice Guidance</b>	<p>Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed.</p> <p>The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.</p> <p>Charging authorities may not use the levy to fund affordable housing.</p> <p>The neighbourhood portion of the levy can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to ‘support the development of the area’. The wider definition means that</p>	<p><b>The Major Sites and Infrastructure Team and the CIL Spending Group</b> will ensure that applications for District CIL will be prioritised for funding from District CIL where they can provide timely, deliverable projects that support the growth detailed in the Local Plan. Funding should be focussed towards critical and essential projects already identified as required in the Local Plan Infrastructure Frameworks.</p> <p>With the implementation of a Developer Contributions Management System, all stakeholders will be able to see how funding is being allocated and spent to deliver infrastructure to support the area.</p>



	the neighbourhood portion can be spent on things other than infrastructure (as defined in the Community Infrastructure Levy regulations) provided it is concerned with addressing the demands that development places on the parish's area. For example, the pot could be used to fund affordable housing.	
<b>Local Plan</b>	As part of each Local Plan there is an Infrastructure Delivery Framework. The tables within this section detail the importance of the infrastructure in terms of local plan delivery and prioritise the infrastructure in terms of being critical, essential and desirable.	<b>Major Sites and Infrastructure Team</b> Have regard to the Critical, Essential and Desirable infrastructure projects required to support delivery of the Local Plan. Discuss delivery timescales and funding arrangements with key infrastructure providers such as Highways, Education, Police, Health, etc – adopting the principles of the right infrastructure, in the right place and at the right time.
<b>Monitoring CIL and the Infrastructure Funding Statement</b>	<b>Comprehensive monitoring arrangements</b> established to ensure commencements of CIL liable development (over 10 dwellings) are identified and the infrastructure requirements, put forward and agreed in the planning process) are prioritised for District CIL allocation to ensure timely delivery.	<b>Planning Policy Team and the Major Sites and infrastructure Team</b> - Tracking of development delivery to ensure CIL Funded projects are identified and discussed with key infrastructure stakeholders and added to Infrastructure Funding Statement to ensure funds are “safeguarded” to secure imminent delivery.

## Appendix D: Draft Terms of Reference - CIL Spending Working Group

Appointment of Working Groups for 2020/21

### Community Infrastructure Levy (CIL) Spending Working Group

#### Terms of Reference:

- To act in an advisory/consultative capacity to the Cabinet Member for Planning and Coastal Management and through him/her to Cabinet/Full Council, as appropriate.
- To work with officers to review and prioritise applications for infrastructure funding through District Community Infrastructure Levy (DCIL), and to consider the relevance of applications in terms of the objectives of CIL through making development sustainable in planning terms.
- Take into account the wider strategic planning issues and collaboration with other local authorities, particularly those within the same housing market area and functional economic area and those infrastructure providers priorities.
- Consider the findings of evidence base documents to inform the preparation of documents.
- To work with officers to agree and publish issues and options papers and recommendations for infrastructure projects to be funded through DCIL for approval by Cabinet.
- To work with officers to review and support the issue of clawback notices where local town and parish councils have not spent Neighbourhood CIL (NCIL) in compliance with the CIL Regulations and the 5-year spending deadline.
- To agree on NCIL spend in areas not covered by a Parish Council.
- Act as a focal point for knowledge and information about the application of DCIL and Neighbourhood CIL (NCIL) to infrastructure projects.
- Receive progress updates on the delivery of DCIL funded infrastructure projects, as relevant.
- To scrutinise and input to the review of CIL Spending Strategy to ensure compliance with regulatory requirements and the continued delivery of infrastructure to support growth in the area and where necessary outside of the area where strategic infrastructure supports growth in the East Suffolk area.
- To review and agree the annual Infrastructure Funding Statement.

The Working Group will meet 3 times a year, subject to business.

Vice Chairman to be elected at the first meeting of the municipal year.

No substitutes. Other members can only be invited at the discretion of the Chairman of the CIL Spending Working Group.

The Working Group maintains a standing invite to relevant officers responsible for the delivery of infrastructure and other local authority or Health representatives and organisations will also be invited as and when appropriate.

<p><b>Membership - 6 (Quorum 4)</b></p> <p>Either the Cabinet Member with the responsibility for Planning and Coastal Management, or his/her Assistant Cabinet Member (Chair)</p> <p>Relevant Cabinet Members (2)</p> <p>Relevant Planning Committee Chairman/Vice-Chairman (1)</p> <p>Labour Group Member (1)</p> <p>GLI Group Member (1)</p>	<p>Assistant Cabinet Member for Planning and Coastal Management – Tony Cooper</p> <p>Cabinet Member with responsibility for Communities, Leisure and Tourism – Letitia Smith</p> <p>Cabinet Member with responsibility for the Environment – James Mallinder</p> <p>Planning Committee South Vice-Chairman – Tony Fryatt</p> <p>To be advised by the Labour Group</p> <p>To be advised by the GLI Group</p>
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## Appendix E: District CIL Application - Assessment and Validation Template

**Project –**

**Reviewer:**

**Date completed:**

Validation Criteria	Notes
All the questions on the District CIL Application form must be fully completed (where information known)?	
Has the correct application form been used and has it been received within timescales?	
Costs and funding streams for provision are both clear and the sums add up? VAT position known?	
The description of the infrastructure, location, purpose is clear?	
Are the Benefits of the infrastructure clear?	
Is there housing or employment development in the area creating increased demand? Has this development commenced/ or is it preparing to commence? Is the application premature?	

Validation Criteria	Notes
Is the proposed infrastructure critical, essential or desirable within the Local Plan Infrastructure Delivery Framework?	
Is the proposed infrastructure detailed in a Neighbourhood Plan as a priority?	
Are the parish council working towards a Neighbourhood Plan? What's the status? Has work been undertaken to understand infrastructure requirements?	
Where there is no neighbourhood plan has evidence been provided of a PIIP?	
If the infrastructure is not detailed in the Local Plan Infrastructure Delivery Framework or in a Neighbourhood plan does it meet the criteria for "Beneficial" within the Priorities for Funding Infrastructure Projects Statement?	
Has the project got Community Support – what evidence is provided of this? Is it adequate?	
Is it supported by the town or parish council (if not led by them)?	
Need /Justification? If there is existing infrastructure, do the proposals create additionality?	

Validation Criteria	Notes
Is the infrastructure capable of being used by the wider community?	
If the bid is over £50K, has a business case been submitted?	
Quotations for works/Quantity Surveyors costings supplied – must supply at least three or evidence of tender process (e.g. NHS and SCC have official tender programmes in place so will already have a nominated contractor)	
How much financial support is sought from East Suffolk and for what?	
Collaborative spend – yes/no and if yes give details? % of the whole Project cost requested.	%
Who is leading on delivery? Has the right applicant applied for the funding?	
Delivery proposal and timescales are detailed?	
Does the bid demonstrate an urgent need?	

Validation Criteria	Notes
If the infrastructure needs planning permission - has this been sought and obtained?	
Has any state aid already been received or offered from other government sources? – If yes and more than 200eu indexed - complete state aid assessment	
Consideration of future funding/maintenance once project is complete? What/How funded?	
Assessment of view of affordability from District CIL (after consideration of critical and essential expenditure and ringfencing requirements)	

**Summary of Risks:**

**Type of Project:** Essential Infrastructure/Desirable Infrastructure/Beneficial Infrastructure

**Statement:**

## **Appendix F: Prioritisation Criteria Template**

### **Principles of District CIL Allocations Criteria**

**Project – .....**

**In all cases to be considered favourably:**

a)	The infrastructure supports new housing and/or employment growth;	
b)	Timeliness (has the new housing the infrastructure is required to make sustainable commenced?);	
c)	The benefits of the infrastructure are clear;	
d)	The infrastructure is capable of being used by the wider community;	
e)	The infrastructure proposed represents value for money;	
f)	The infrastructure should be new or if being enhanced there must be some additionality in what facilities and/or services are being provided;	
g)	Deliverability can be demonstrated (e.g. feasibility has been completed and planning permission granted);	
h)	For local projects, the project has community support demonstrated through evidence of meaningful engagement;	
i)	Feasibility studies will only be funded when they form part of a fully costed project that has planning permission in place and is ready to be immediately delivered – feasibility studies alone do not produce infrastructure;	
j)	Where the infrastructure is provided by a statutory partner, they agree the project is required and have the project tabled into their delivery plans;	
k)	District CIL Funds are applied for by the infrastructure provider where this is delivered by or through a statutory partner such as Highways, Education, Health or Police;	
l)	A business case is provided where funding over £50k is sought;	
m)	A suitable package of measures has been identified which allow for funding of ongoing maintenance of the infrastructure in order to secure continued use;	



n)	The timing of delivery of the project is clear and payment stages are defined;	
o)	Costings must be clearly defined and evidenced based (3 quotes or quantity surveyors costings provided as applicable);	
p)	Where VAT can be claimed back this should be clear and discounted from costings;	
q)	All avenues for collaborative spend have been explored – e.g. grants, other government funding (locality monies, LEP, County Council, District, Parish), Neighbourhood CIL, community fundraising, retail shop match funding and crowd funding;	
r)	There is certainty around other funding sources;	
s)	By releasing District CIL funding we can achieve infrastructure provision through collaborative spend (i.e. other grant funding, Community Partnership and locality funding, LEP/Government funding, Neighbourhood CIL, Crowd Funding/Donations);	
t)	State Aid considerations do not inhibit the funding (projects where public funding is in excess of £200k);	
u)	Affordability from District CIL funds (all essential and critical infrastructure needs are currently met by the CIL received from commenced developments);	

### **Priorities for Funding Infrastructure Projects**

The following infrastructure types will be assessed accordingly together with the 'in all cases criteria' in the Principles of District CIL Spending section:

**Essential Infrastructure – will be planned for in CIL forecasting and will be considered first in bids**

<b>1</b>	It is infrastructure necessary to support allocated development in order that development carried out is sustainable	
<b>2</b>	It is infrastructure necessary to support an approved development (proposed developments with planning	

	permission granted) in order that development carried out is sustainable	
<b>3</b>	Is identified in the Infrastructure Delivery Framework of the Local Plans or is identified in the Neighbourhood Plan as a priority	
<b>4</b>	It represents key infrastructure (i.e. it is classified as critical or essential within the Infrastructure Delivery Framework of the Local Plan or the Neighbourhood Plan)	
<b>5</b>	The bid/identification of need must demonstrate that the time of delivery for funding is correct.	
<b>6</b>	It represents infrastructure detailed in the Infrastructure Funding Statement.	

**Desirable Infrastructure – Will continue to be recognised in CIL spend forecasting and will be considered for bids on a case by case basis:**

<b>1</b>	The provision of this infrastructure addresses a current inadequacy in infrastructure terms and the benefits of the infrastructure are clear	
<b>2</b>	The infrastructure is identified as 'desirable' in the Local Plan or Neighbourhood Plan	
<b>3</b>	Neighbourhood CIL funding has been allocated to fund the project	
<b>4</b>	It would allow infrastructure to be delivered through collaborative funding with district CIL being 'the last piece of the jigsaw'	

**Beneficial Infrastructure – considered on a case by case basis and must meet one of the following:**

<b>1</b>	By provision of infrastructure it would unlock <b><i>further opportunities</i></b> within the District for housing and employment growth – e.g. the relocation of a Community Centre or similar infrastructure to a new building which would be mostly funded through the sale/re-use of the land as residential or business use and there are adequate facilities in the area to serve the development.	
<b>2</b>	It is infrastructure which has not previously been identified as essential or desirable in the IDF or Neighbourhood Plan, but a clear link can be identified in supporting the sustainability of the Local Plan.	
<b>3</b>	It is infrastructure which addresses a recently unexpected shortfall in infrastructure or community provision accounted for as having an influence on the sustainability of a community in the Local Plan. - e.g. <i>closure of a pre-school facility and the need for a replacement.</i>	

#### **District CIL does not fund**

The following are not considered appropriate spend from District CIL:

- Up front funding for feasibility studies and professional fees where there is no guarantee that the infrastructure would be delivered;
- Infrastructure replacement or improvements in areas where there is no major developments commencing and limited growth;
- Infrastructure that is not supported by lead statutory bodies, for example, traffic calming or pedestrian crossings if these are not considered as required infrastructure by the Highways Authority
- Ongoing operational or maintenance costs; and
- VAT where this can be reclaimed