



Full Council

Members are invited to a **Meeting of the Full Council** to be held in the Conference Room, Riverside, Lowestoft on **Wednesday, 22 November 2023** at **6.30pm**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at <https://youtube.com/live/hypualzJtwk?feature=share>

Members:

All Councillors

An Agenda is set out below.

Part One – Open to the Public

Pages

- 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 interests, and the nature of that interest, 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 Minutes** **1 - 23**
To confirm as a correct record the minutes of the meeting held on 27 September 2023.
- 4 Announcements**
To receive any announcements from the Chair, the Leader of the Council, members of the Cabinet, or the Chief Executive, in accordance with Council Procedure Rule 5.1(e).
- 5 Questions from the Public**
No questions have been submitted by the electorate as provided by Council Procedure Rule 8.

6 Questions from Members

The following questions from Members have been submitted in pursuance of Council Procedure Rule 9:

Question from Councillor Graham Parker to Councillor Toby Hammond, Cabinet Member with responsibility for Economic Development and Transport

Supporting the transition to electric vehicles (EVs) plays a significant role in helping the UK to meet its Net Zero targets, but progress so far has been slow. While the Government estimates the UK will need 300,000 EV charge points by 2035, when the sale of new petrol and diesel cars will be banned, current figures show the UK has fewer than 40,000 publicly accessible EV charge points.

With a mere 13% of the target achieved so far, accelerating the current roll-out pace is more important than ever.

What is the plan to install sufficient EV charging infrastructure in East Suffolk, and given there are just three public charging points in our own carparks throughout the entire District, when can we see that useful facility and income stream increasing?

Question from Councillor Alan Green to Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management

The cost of a planning application for alterations to a domestic property is £206.00. The planning committee of the Parish of Kessingland has recently recommended for approval an application for the fitting of a heat pump. I believe this is the first stand-alone application to upgrade a heating system in Kessingland at a domestic property.

Due to the high cost of the pumps, and also the expense of installation, would the council consider waiving the cost of applications for heat pumps to encourage residents to apply? This will also support the Council's Climate Emergency Declaration in its endeavour to get to Net Zero.

7 Petitions

No petitions have been received as provided by Council Procedure Rule 10.

8 Notices of Motion

The following Motion has been submitted in pursuance of Council Procedure Rule 11:

Motion from Councillor Tess Gandy to be seconded by Councillor Peter Byatt**This Council notes that:**

1. The Public Services (Social Value) Act of 2012 allows the Council to take into consideration, in the award of procurement contracts, any offer of additional community benefit which is over and above the specified requirements where these meet the Council's priorities.
2. Since 2022 East Suffolk's 'Procurement and Contract Management Strategy' has embedded Social Value as a key consideration, with a positive weighting, into its procurement decisions. Beyond considering price alone, its spending power is now used to produce wider benefits that directly improve local communities, the local economy, and the environment.
3. Around 17.5% of public procurement contracts in the UK with a combined value of £37.5bn have been won by companies with links to tax havens, harming our economy by extracting tax receipts and significantly reducing the contributions that support vital public services.

This Council resolves to:

1. Promote and expect transparent, exemplary tax conduct from its suppliers and their supply chains;
2. Use the Social Value Act to integrate tax status further into our procurement process by giving weighting, as appropriate, based on a supplier's ethics and how and where they pay their tax when undertaking a buying decision, alongside considerations on other social value offers, value for money and the quality of service provided and
3. Report on the implementation and progress of social value benefits gained through procurement decisions on an annual basis.

9	Our Direction 2028 ES/1740 Report from the Leader of the Council	24 - 54
10	Review of the Council's Statement of Licensing Policy ES/1738 Report of the Cabinet Member with responsibility for Community Health	55 - 95
11	Wickham Market Neighbourhood Plan ES/1737 Report of the Cabinet member with responsibility for Planning and Coastal Management	96 - 153
12	Code of Corporate Governance ES/1739 Report of the Leader of the Council	154 - 174

Part One – Open to the Public		Pages
13	Lowestoft Flood Protection – Transport and Works Act submission Update ES/1742 Report of the Cabinet Member with responsibility for Planning and Coastal Management	175 - 510
14	Appointment of Chief Finance Officer and Section 151 Officer ES/1741 Report of the Leader of Council	511 - 515
15	East Suffolk Council’s Food and Health & Safety Service Plan 2023-2024 ES/1743 Report of Cabinet Member with responsibility for Community Health	516 - 603
16	Cabinet Members’ Report and Outside Bodies Representatives’ Report to Council ES/1736 Report of the Leader of the Council.	604 - 626
17	Exempt/Confidential Items It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act.	

Part Two – Exempt/Confidential		Pages
18	Exempt Minutes <ul style="list-style-type: none"> • Information relating to the financial or business affairs of any particular person (including the authority holding that information). 	

Close



Chris Bally, Chief Executive

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

Questions from the public at Full Council meetings

Any resident of East Suffolk who is listed on the electoral register may ask questions to the Chair of the Council, the Leader of the Council, members of the Cabinet, or the Chair or Vice-Chair of any committee or sub-committee of the Council, at any ordinary meeting of the Full Council (this excludes the Council's annual meeting or any extraordinary meetings of the Full Council).

Questions must be submitted in writing or by email to the Proper Officer no later than midday ten working days before the date of the meeting. Each question must give the name and address of the questioner and must name the member of the Council to whom it is to be put. The scope of questions that can be considered can be found in the Council Procedure Rules set out in Part 3 of the [East Suffolk Council Constitution](#).

Although the deadline has passed for questions to be submitted for this meeting of the Full Council, you are able to submit questions for a future meeting. Details on the deadlines for submitting questions to all of the Council's scheduled meetings can be found [on our website](#).

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.

The Council cannot guarantee public seating areas will not be filmed or recorded. By entering the Conference Room and sitting in the public seating area, those present will be deemed to have consented to the possible use of filmed images and sound recordings. If you do not wish to be recorded, please speak to a member of the Democratic Services team at the earliest opportunity.



The national Charter and Charter Plus Awards for Elected Member Development

East Suffolk Council is committed to achieving excellence in elected member development

www.local.gov.uk/Community-Leadership

Unconfirmed



Minutes of a Meeting of the **Full Council** held in the Deben Conference Room, East Suffolk House, on **Wednesday, 27 September 2023 at 6.30 pm**

Members present:

Councillor Paul Ashdown, Councillor Paul Ashton, Councillor Edward Back, Councillor David Beavan, Councillor Seamus Bennett, Councillor Peter Byatt, Councillor Jan Candy, Councillor Jenny Ceresa, Councillor Dan Clery, Councillor Janet Craig, Councillor Tom Daly, Councillor Mike Deacon, Councillor Julia Ewart, Councillor John Fisher, Councillor Tess Gandy, Councillor Andree Gee, Councillor Louise Gooch, Councillor Katie Graham, Councillor Alan Green, Councillor Owen Grey, Councillor Toby Hammond, Councillor Colin Hedgley, Councillor Mark Jepson, Councillor Beth Keys-Holloway, Councillor George King, Councillor Vince Langdon-Morris, Councillor Stuart Lawson, Councillor Geoff Lynch, Councillor James Mallinder, Councillor Stephen Molyneux, Councillor Mike Ninnmey, Councillor Sally Noble, Councillor Mark Packard, Councillor Keith Patience, Councillor Malcolm Pitchers, Councillor Sarah Plummer, Councillor Lee Reeves, Councillor Craig Rivett, Councillor Sheryl Rumble, Councillor Myles Scrancher, Councillor Rachel Smith-Lyte, Councillor Rosie Smithson, Councillor Anthony Specca, Councillor Jamie Starling, Councillor Ed Thompson, Councillor Caroline Topping, Councillor Geoff Wakeling, Councillor Sarah Whitelock, Councillor Tim Wilson, Councillor Kay Yule

Officers present: Chris Bally (Chief Executive), Chris Bing (Head of Legal and Democratic Services), Kate Blakemore (Strategic Director), Lorraine Fitch (Democratic Services Officer), Naomi Goold (Energy Projects Manager), Phil Harris (Strategic Communications and Marketing Manager), Richard Jacobs (Port Health Manager), Andy Jarvis (Strategic Director), Nick Khan (Strategic Director), Matt Makin (Democratic Services Officer), Sue Meeken (Political Group Support Officer (Labour)), Agnes Ogundiran (Conservative Political Group Support Officer), Bethany Rance (Senior Planner - Energy Projects), Philip Ridley (Head of Planning and Coastal Management), Isabel Rolfe (Political Group Support Officer (GLI)).

1 Apologies for Absence

Apologies for absence were received from Councillors Dean, Folley, Parker and Robinson

2 Declarations of Interest

There were no Declarations of Interest made.

3 Minutes

RESOLVED

That the Minutes of the meeting held on 26 July 2023 be agreed as a correct record and signed by the Chair.

4 Announcements

Chair of the Council

The Chair stated that he had attended several civic events on behalf of East Suffolk including:

7 September, the Production of Call Me John in Bungay, performed by Reflex Theatre

7 September, the Tour of Britain Stage 5, Start and Finish – in the VIP Viewing Area at Felixstowe

9 September, the Mid-Suffolk District Council Chairman's Charity Summer BBQ held at Alder Call Farm.

17 September, the RAFA Battle of Britain Parade & Service at St Michaels Church, Beccles

24 September, the Mayor of Beccles Civic Service at St Michaels Church, Beccles

Vice Chair of the Council

Councillor Fisher attended 4 events since the last Full Council meeting:

28 July, the 23 Parachute Engineer Regiment - Freedom of Woodbridge Parade and Lunch

18 August, he attended the Mayor of Ipswich Charity Evening Aboard the Sail Barge Victor

19 August, the Open Day at the Alice Grange Care Home in Kesgrave where he opened a new building extension and was asked to cut the ribbon

15 September he attended the Battle of Britain Commemoration at County Hall, Norwich

Leader of the Council

Councillor Topping advised that she had made a number of appointments, using her delegated authority as Leader of the Council and they were as follows:

With effect from the end of this meeting, Councillor Jan Candy will be the Cabinet Member with responsibility for Community Health. There will be no Assistant Cabinet Member at present.

Also with effect from the end of this meeting, Councillor Sarah Whitelock will be the Cabinet Member with responsibility for Communities, Leisure and Tourism. Councillor Katie Graham will be the Assistant Cabinet Member with responsibility for Communities, Leisure and Tourism.

Councillor Daly, Cabinet Member with responsibility for Energy, will no longer have an Assistant Cabinet Member to support him. However, both Councillors Sarah Whitelock and Katie Graham will provide additional support to Councillor Daly, as necessary.

Councillor Topping advised she has appointed Councillor Molyneux to the Love Woodbridge and Melton Board with affect from 29th August 2023.

Cabinet Members

Councillor Ashton and Councillor Craig visited the Ravine Bridge in Lowestoft. The bridge was currently under cover however there was lots of work taking place. There were some challenges in preserving the original structure.

Reinforced Autoclaved Aerated Concrete (RAAC) – Cabinet had been updated that on investigation there have not been any identified premises effected and it was anticipated this will remain the case. Inspections were continuing to ensure due diligence was carried out in respect of RAAC.

At the previous Full Council meeting, Councillor Rivett had posed a question regarding commercial activity in respect of Wind Farms. Councillor Ashton reported back on this to state there was a fifth round of renewable auctions and no bids for offshore wind were received. Councillor Ashton expressed disappointment about this. There were great facilities for training people in the maintenance of wind farms and other marine based activities in the district. There was a great plan for the power park and which was a sound strategy which provided what was needed for Lowestoft.

Chief Executive

There were no announcements from the Chief Executive.

The Chair referenced the recent sad passing of a former Waveney District Councillor, Mike Barnard. Councillor Craig Rivett, Leader of the Conservative Group, paid tribute to Mike Barnard and his hard work for the Conservative Group.

5 Questions from the Public

The following questions were submitted by the public in pursuance of Council Procedure Rule 8:

a) Question from Joan Girling to Councillor Caroline Topping, Leader of the Council

In the light of the recent policy consideration by Central Government that on shore Wind turbines may win support and possibly gain Planning Permission. Would East Suffolk Council look favourably on a proposal for a Community Wind Project such as the Bristol Community Energy Scheme?

Response from Councillor Caroline Topping, Leader of the Council

In principle yes, however in current planning terms any applications for onshore wind would be considered against the policies contained within East Suffolk Council's Local Plans. Both Local Plans have policies (SCLP9.1 and WLP8.27) which support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led.

The NPPF sets out that Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

Except for applications for the repowering and life-extension of existing wind turbines, a planning application for wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan or a supplementary planning document; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.

b) Question from Jenny Kirtley to Councillor Caroline Topping, Leader of the Council

In view of the duty of care that the CROW Act 2000 places on the Council to conserve and enhance the Suffolk Coast and Heaths AONB and the power that section 84 of that Act gives to the Council to ensure that the attributes of the AONB are conserved and enhanced, we hope the Council share TASC's grave concerns regarding the damage already being inflicted by SZC's preliminary works on the landscape quality and biodiversity of the AONB before a Final Investment Decision for the project has been made and before a Nuclear Site Licence has been granted. Current works include the felling of over 100 acres of woodland, grubbing out miles of hedgerows, cutting reedbeds in the Sizewell Marshes SSSI, vast soil excavations and transfers, and the construction of a 2.8km temporary Highways' Standard roadway 14 metres wide that runs through the AONB.

TASC ask East Suffolk Council for confirmation that, if for any reason construction of the SZC nuclear power station does not proceed, there are adequate legal conditions in place and that SZC Co have sufficient funds, to ensure the total restoration of the AONB to enable the AONB to maintain the integrity of its designation for the benefit of future generations. Will the Council also outline its engagement with SZC Co that is designed to get them to refrain from further AONB damaging work until the financing and licencing has been agreed.

Response from Councillor Caroline Topping, Leader of the Council

The application for the Sizewell C development consent was supported by a Funding Statement which demonstrated to the satisfaction of the Secretary of State that the necessary funding could be secured to acquire any land, interests in land and rights over land and the payments of compensation. In addition to this there have been several announcements recently from the Government confirming their commitment to invest in the project. For this reason, it is considered that SZC Co. would have sufficient funds at this stage for reinstatement should this be necessary. Requirements 29 and 38 secure removal and reinstatement of the Main Development Site and Associated Sites and link to the need to provide further details of the reinstatement.

The Sizewell C Development Consent Order sets out what activities and works are permitted to be undertaken during the pre-commencement phase ahead of formal commencement of the project. The activities and works permitted include the removal of hedgerows, trees and shrubs, in addition to a number of others. ESC therefore has no ability to prevent Sizewell C from undertaking works in accordance with the Development Consent Order.

c) Question from Michael Mahony Chairman, Friston Parish Council

This community has already endured applications for four nationally significant infrastructure projects, namely Sizewell C, East Anglia One North, East Anglia Two and the National Grid connection hub at Friston.

Currently National Grid is promoting three interconnector projects in this area, Sealink, Lionlink and Nautilus, all three of which are to connect at the proposed National Grid connection hub at Friston. Currently National Grid is proposing to pursue three separate planning processes for the projects despite the likelihood that the onshore elements in East Suffolk will be very similar. This means the local community will have to engage in three further processes, involving three separate consultations, three separate sets of representations and written submissions and separate hearings etc. This is oppressive not least because members of the community can only participate by giving up their own free time and at their own expense, Given such an intolerable burden, this inefficient approach will have an exclusionary effect and render the processes unfair.

It should be noted there was such a single process for Scottish Power's EA1N and EA2 projects and the National Grid connection hub.

Will the Council strongly support (writing to all relevant parties) a process whereby these three processes are conducted at the same time so that effectively there is a single process significantly reducing the burden on the local community in East Suffolk?

Response from Councillor Tom Daly - Cabinet Member for Energy and Climate Change

East Suffolk Council recognises the significant burden engaging with multiple nationally significant infrastructure projects (NSIPs) places on local communities. We fully acknowledge the benefits of coordinating the consenting process for the different NSIPs and the dis-benefits of not. ESC therefore fully supports the need to coordinate the consenting processes of the different projects, which if their timescales aligned could include support for conjoined examinations or a single examination, should this

be legally permitted. This has been discussed multiple times with the developers, highlighted within the Offshore Transmission Network Review workstreams and discussed with a representative from the Planning Inspectorate. The management of the consenting process is a matter which ESC will continue to discuss going forwards.

d) Question from Alison Downes

In light of the recent confusion following the meeting at Aldringham cum Thorpe Parish Council (4 September), when attendees were erroneously told by the Sizewell C communications team that the Sizewell Link Road was a temporary feature and would be taken up after construction, how can local people believe a word they say? In the circumstances, does the Council agree that Sizewell C's dogged refusal to reinstate the Community Forum is totally without justification?

Response from Councillor Tom Daly - Cabinet Member for Energy and Climate Change

The Community Forum was an independent group of local representatives and stakeholders which met throughout the public consultation process to discuss Sizewell C proposals. It was noted in the minutes of the last meeting that the group would only meet once more after the Sizewell C application had been submitted.

The importance and need for Sizewell C Co. to continue this engagement with representatives of local town and parish councils post consent was however recognised within the Deed of Obligation, agreed during the Sizewell C examination. Schedule 17 of the Deed requires Sizewell C Co. to establish the Sizewell C Forum on or before commencement, the forum will comprise one elected councillor or clerk from each of the parish and town councils within East Suffolk in addition to other stakeholders, as set out in the Deed. The Sizewell C Forum effectively takes over the role post commencement and during construction of the project which the Community Forum held during the pre-application phase.

ESC therefore fully understands and supports the need for this engagement and supports the establishment of the Sizewell C Forum in accordance with the obligations set out in the Deed.

The Chair thanked the attending members of the public who put forward their questions.

6 Questions from Members

The following question(s) from Members were submitted in pursuance of Council Procedure Rule 9:

a) Question from Councillor Janet Craig to Councillor Caroline Topping, Leader of the Council

In response to a Labour Motion from November 2022, the Chair wrote to both Anglian Water and Therese Coffey MP about the raw sewage discharge occurring in our rivers and coastal waters.

We received a very thorough letter from Peter Simpson, the Chief Executive Officer at Anglian Water, in January 2023 and a much less informative reply from Rebecca Pow MP, Minister for Environmental Quality and Resilience.

Can you advise if the Council took up the offer from Anglian Water to discuss the issues raised, and given that we are still recording sewage discharge along our coast can we have an update on what has been achieved?

Response from Councillor Caroline Topping, Leader of the Council

As a District Council, East Suffolk Council is not the lead authority on matters related to sewerage discharges – it is the responsibility of the Environment Agency to hold water companies to account where there are breaches. The Council can however play a key role in raising residents’ concerns to the relevant organisations, as happened in this instance.

Following the Motion passed on 23rd November 2022, the East Suffolk Council Chair wrote to The Rt Hon Therese Coffey MP, Secretary of State for the Environment and Peter Simpson, CEO of Anglian Water. Responses were received on 25th and 27th January 2023 respectively. The responses were circulated to all Members by the Environment Portfolio Holder and Chair of the Environment Task Group. Anglian Water offered to organise a visit for Councillors to a water recycling site to talk through the process.

Due to the proximity to the pre-election period and the May 2023 elections, it was decided that it would be prudent wait and for Members in the new administration to take up Anglian Water’s offer if they would like to do so.

The new administration met with Anglian Water at informal Cabinet on the 7th August to discuss inclusions in the Anglian Water 2025-2030 Business Plan. Councillors raised with Anglian Water that sewerage overflow is one of the main areas of concern for their constituents, in particular around the Waveney, Deben and Orwell and indeed flagged up some data on Anglian Waters presentation that said that they thought sewerage overflow was a low priority for residents. The Business Plan provides target figures but more detail was identified as being required as well as an end date for when this practice will cease.

A roundtable was also held by the Environment Secretary and Water Minister in Woodbridge on the 10 August 2023 to drive forward improvements in the River Deben which included key stakeholders in river water quality including the Environment Agency, Anglian Water, Natural England and East Suffolk council Officers. It is a shame that no member of the Cabinet was invited to attend and the Leader was not even informed the meeting was taking place.

Officers continue to keep up the momentum on the concerns raised in the Motion via regular engagement with Anglian Water thorough our Planning function and issuing detailed responses to the series of Water Resource Planning consultations that took place over the summer (the Anglian Water Resource Management Plan, Essex & Suffolk Water Resource Management Plan and Water Resources East Regional Water Resource Management Plan).

The Environment Taskgroup will be taking this issue forward on their work programme.

Supplementary Question from Councillor Craig

Could water quality signs be displayed across beaches so people know if it safe to swim?

Response from Councillor Topping

Councillor Topping responded that she uses an app which outlines when sewage has entered the waters and believed this information can be accessed digitally. Councillor Topping will see if there are any other means to display warnings. However, adding physical signage can be detrimental to blue flag status

b) Question from Councillor Jenny Ceresa to Councillor David Beavan, Deputy Leader and Cabinet Member with responsibility for Housing

During my time as Chairman, I regularly promoted “debate not hate”.

It was regrettable that a report was brought to Full Council on 15 March 2023, by the Audit and Governance Committee and further to independent lawyer investigation, they determined that Cllr Beavan had breached the Code of Conduct. In his email of 30 May 2022, he publicly accused officers in the Housing Team of ‘fiddling the figures’. At that full council meeting it was reported that the requested apology had not been given.

Has Councillor Beavan since given that apology to the Housing officers?

Response from Councillor David Beavan, Deputy Leader and Cabinet Member with responsibility for Housing

Thank you, Councillor Ceresa for your question but, as you already know, this all happened six months ago.

I hope you are not just using this as an opportunity for another personal attack.

I am all in favour of “debate not hate” and I certainly don’t hate my housing department. I love them.

In four months, our mutual passion for housing has forged a great working relationship that I am sure will not be dented by political jibes. If you refuse to believe me, why don’t you ask them?

I am passionate about addressing the challenges we have with young working families homeless on the street of my ward evicted by a housing crisis that is geared for private greed not public need.

I know that it has been a difficult year for you and your colleagues.

You must be still grieving the devastating loss of most of your councillors in the May elections.

It is a sad fact that we politicians always end up less popular than when we started.

But isn't it about time we put the election behind us and got on with our job – a shared mission for East Suffolk.

There is more that unites us, than divides us.

This new council is open and inclusive. We want to work with you. It's time to stop hating and start debating.

Supplementary Question from Councillor Ceresa

Why did it take so long to apologise when the email was sent in May 2022?

Response from Councillor Beavan

It was the second apology as I had apologised before. Does it really matter? Can we not move on and work together going forward?

c) Question from Councillor Craig Rivett to Councillor Topping, Leader of the Council

I'm aware of several instances where residents and fellow councillors have contacted Members of the Cabinet with queries / requests, and they have been subjected to lengthy waiting times for responses and in some instances, no response at all.

What timeframe does the leader think would be reasonable to wait for a response?

Response from Councillor Caroline Topping, Leader of the Council

There are no minimum standards laid down in the Constitution regarding response times.

My new Cabinet consists of dedicated and hard-working Members. Since forming the Cabinet we have worked hard to understand the wide range of service areas that fall within each portfolio area, build relationships with officers and stakeholders alongside refocussing the strategic direction of this Council, whilst still listening to and responding to the needs of our own residents within the various wards and parishes we serve and indeed other Members.

Each Cabinet Member has taken on this challenge with enthusiasm and dedication to do the best they can for the residents of East Suffolk Council. I can therefore assure everybody that none of my Cabinet has deliberately not responded to any queries and are working hard to accommodate everything that is being asked of them. I would like to point out that there are no minimum standards laid down in our constitution regarding response times and it would be unfair to all concerned to add a response

time. It can in fact be quite challenging to meet everybody's expectations and you will have experienced this challenge yourself.

Therefore, can you please resend any outstanding queries you are aware of to the relevant Cabinet Member and copy me into any outstanding issues outside of this meeting, as we will be more than happy to follow up and resolve these queries.

Of course, we want to respond in a timely way to all queries and requests and will continue to try and do this.

Councillor Topping asked for any instances where responses were outstanding to be forwarded to her for review.

Supplementary Question from Councillor Rivett

I will say that some Members of the Cabinet have been very prompt. It was interesting that the Leader said all of the Cabinet are dedicated as some Cabinet Members have been open about their disinterest in the areas of work they are responsible for and have directed people to go to officers.

Response from Councillor Topping

Any Member of the Council who is unhappy with the responses they have received to emails, this will be reviewed. If there are any outstanding queries that require a response, Members should go back to the Portfolio Holder and copy Councillor Topping in.

7 Petitions

No petitions had been received as provided by Council Procedure Rule 10.

8 Notices of Motion

Before the consideration of motions several Councillors declared they were members of different organisations which might require them to declare an interest before discussing the motion, these included Greenpeace and groups which oppose the development of Sizewell and nuclear energy.

The Monitoring Officer advised that membership of the groups mentioned were Other Registerable Interests.

Councillor Gandy enquired whether she had a Disclosable Pecuniary Interest through her partner's employment. The Monitoring Officer advised that her partner's employment was a Pecuniary Interest she needed to register but only one she needed to declare if the interest directly related to the motion.

The Chair reported that 2 Notices of Motion were accepted prior to the meeting.

A) Motion submitted by Councillor Tom Daly

The Chair invited Councillor Daly to read out his motion.

"That this Council believes:

That truly renewable energy, such as offshore and onshore wind, solar, community energy schemes and micro generation, alongside the reduction of energy use and better design provide a better long term answer to the energy security of and carbon reduction future of the UK rather than Sizewell C.

That offshore options for connecting offshore renewables into an existing brownfield location have not been sufficiently investigated and provide a better long-term more cost effective and sustainable solution to the UK's energy supply and security challenges.

That the Council resolves:

(a) that should the construction at Sizewell C proceed, we will strongly represent our East Suffolk communities to maximise the benefits and minimise the impacts and that development should only commence once long-term solutions to the issues below have been identified by Sizewell C Ltd in conjunction with all stakeholders.

- Water supply;*
- Sea defences, coastal dynamics;*
- Long term local storage of highly radioactive spent fuel;*
- Marine biosphere impacts;*
- Satisfactory confirmation of the size of the development site with associated impacts on Minsmere and other precious habitats.*

(b) To write to the SoS with these views and ask government :

- To carry out a full cost-benefit analysis of options for connecting all electricity generation to users in the UK rather than the current piecemeal approach*
- To mandate a direct community compensation scheme for those directly impacted by hosting the energy infrastructure as a matter of urgency as per their recent consultation in addition to provisions in the DCO process."*

Councillor Daly summarised the motion and stated that the idea was to bring debate all these issues, which are important to the community. After approval has been given for the Development Consent Orders (DCOs) these cannot be revoked. The previous administration took a neutral position. The new administration would have taken a different position.

With regard to strategic planning work, members of the GII group will engage with their duties and conduct constructive engagement whilst remaining explicit in opposition to the development of Sizewell C. The group will do their utmost to promote best possible communication and rapid responses with the Sizewell C team. This will not be an approval of the Sizewell C and offshore wind work.

There was promise of community benefits and jobs opportunities which the group will continue to monitor with the understanding these benefits in no way negate the risks associated with the project.

Councillor Daly outlined the concerns of the council in regard to the unresolved issues in the development programme of Sizewell C, including sea defences, water supply and marine biosphere impacts.

With regard to the Friston connection programme substantial work has not yet started and there are mechanisms where Scottish Power could be incentivised to embrace change.

Councillor Daly moved the Motion and encouraged Members to vote unanimously on the motion and send a message to national government, that East Suffolk Council will not be silenced on the discussed.

The motion was seconded by Councillor Whitelock who spoke to the motion as a resident and councillor for Aldeburgh and Leiston ward.

Councillor Whitelock was first asked to look into the Friston Energy Mega hub in 2020 and Sizewell C in 2021 as a voluntary committee member for the Local Business Association. Councillor Whitelock stated that she had felt misled by Scottish Power in the information provided.

The project would not generate one single long-term job. Councillor Whitelock outlined the development challenges on Hinkley Point, being two years behind schedule and over budget with expected costs at 26 billion pounds compared to the originally projected 18 billion pounds.

UK Government is expected to be the majority shareholder if Sizewell C by the end of 2023. 1 billion pounds has already been spent. Councillor Whitelock questioned how many solar panels and heat pumps could have been purchased for residents in comparison.

Councillor Whitelock stated that Sizewell C would be worse compared to Hinkley Point as the site is smaller, with less water supply, inadequate road networks and protected wildlife.

The Chair therefore proposed that the Motion be discussed this evening, which was seconded and upon being put to the vote the proposal was **CARRIED**.

Councillor Rivett began the debate and outlined that the project was examined by the Examining Authority that took evidence from experts and other interested parties. Regarding sea defences and coastal dynamics it was concluded that there were no

matters which would weight for or against the order being made. Long term storage has been carried out for decades with Sizewell B. With regard to sea life it was concluded there were no matters weighing for or against the order.

Councillor Rivett stated that to replace Sizewell C with offshore wind it would require 90,000 hectares, compared to Sizewell C which requires 33 hectares.

Councillor Byatt outlined his amendment to the motion which was provided on screen for members to view. The amendment was as follows (changes indicated in bold):

"That this Council believes:

*That truly renewable energy, such as offshore and onshore wind, solar, community energy schemes and micro generation, alongside the reduction of energy use and better design **have the potential** to provide a better long term answer to the energy security of and carbon reduction future of the UK rather than Sizewell C.*

However we recognise that there are concerns about the time-scale of developing offshore wind-farms, given the recent problems with a complete lack of bidding for new areas for development in the North Sea, the failure of the Vattenfall Project, the increasing cost of construction of new turbines , the availability of land for on-shore wind and solar farms and a recent report into issues related to sub-sea cabling failures.

In addition, there are still ongoing concerns related to the plans for connecting offshore renewables into an existing brownfield location. We believe that these have not been sufficiently investigated and alternatives could provide a better long-term, more cost effective and sustainable solution to the UK's energy supply and security challenges.

That the Council resolves:

(a) that should the construction at Sizewell C proceed, we will strongly represent our East Suffolk communities to maximise the benefits and minimise the impacts and that development should only commence once long-term solutions to the issues below have been identified by Sizewell C Ltd in conjunction with all stakeholders.

- *water supply;*
- *sea defences, coastal dynamics;*
- *long term local storage of highly radioactive spent fuel;*
- *marine biosphere impacts;*
- *satisfactory confirmation of the size of the development site with associated impacts on Minsmere and other precious habitats.*

(b) To write to the SoS with these views and ask government:

- ***To intervene to bring long-term stability and security for future plans for all off and on-shore energy generation***
- *To carry out a full cost-benefit analysis of options for connecting all electricity generation to users in the UK rather than the current piecemeal approach*
- *To mandate a direct community compensation scheme for those directly impacted by hosting the energy infrastructure as a matter of urgency as per their recent consultation in addition to provisions in the DCO process."*

Councillor Byatt stated that he recognised that the majority see renewables as the way forward in the longer-term future. There were concerns about the ability to provide the wind farms as desired. There have been 5 wind farm areas not bid on and a recent commercial project lost.

Councillor Byatt stated that the issues identified with underwater cabling need to be resolved and there needed to be 100% confidence in the cables being fit for purpose. Councillor Byatt stated his opposition to the Friston site. He welcomed the spirit of the motion, but remained concerned about the speed in which wind farms can be developed.

Councillor Byatt outlined that there needed to be a back-up, which might be Sizewell C or smaller nuclear reactors and that the motion seemed to dismiss Sizewell C out of hand.

The amendment was seconded by Councillor Pitchers who reserved his right to speak.

Councillor Rivett thanked Councillor Byatt for his amendment which he felt attempted to make sense of the motion brought before Full Council. He stated that the amendment was a step in the right direction, however a better motion should be formed.

Councillor Pitchers stated he was in favour of renewables and felt that unfortunately Sizewell C is the way forward. He supported the amendment put forward.

Councillor Byatt stated that his intention with the amendment was to make it so there is some common ground and respected what the administration was attempting to do.

At the conclusion of the debate The Chair asked Members to vote upon the amendment. Upon being put to the vote it was **NOT CARRIED**.

The debate continued regarding the original motion put forward:

Councillor Beavan stated that he was not completely against nuclear energy however he believed that the Sizewell C proposal was wrong regarding many factors, including economic technical and environmental.

Councillor Beavan reported that another problem was the LionLink proposal which will have cables, trenches inland, the Friston development and pylons which would lead to London.

He also believed this will be the start of bigger issue, as each windfarm will have to land its own cable to shore, impacting on the issue of coastal erosion, countryside and habitats.

It was further debated that the cables could be run straight to London where the electricity was needed. The recent auction of windfarm sites was not successful with the government's contract for difference price not reflecting inflation.

Councillor Beavan concluded that some windfarms are queuing to join the national grid and an offshore grid was needed to connect them to London. He urged Members to support the motion.

Councillor Lynch stated he could not support the motion. Whilst he utilised green and renewable energy as much as possible there was a need to have other sources of power.

He outlined concerns regarding underground seabed cabling. There have been issues locally when cables have been damaged by fishing activity causing power outages.

Councillor Gooch added to the debate that there was a need to go further in considering lifestyle changes, flying less, looking at the working week, long service leave and other options taken by other countries. Councillor Gooch recognised the sentiments of the motion and returned to early points of nuclear energy not being clean, green or sustainable.

Councillor Topping added that the group were intending for everyone in East Suffolk Council to feel involved and supported by the administration. This was why the motion had been brought to Full Council and decisions had not taken behind closed doors. Councillor Topping stated that there was understanding there were things that cannot be changed, however there was a desire to protect the local environment and community.

Councillor Jepson echoed the point raised earlier that had every if Councillor had voted against the proposal 2 years ago it would have gone ahead anyway. The previous administration had tried to introduce a number of green policies during their time. Being Conservatives does not mean that individuals are not supportive of being 'green'. It was projected that 1/3 UK energy will be transported through the district. Councillor Jepson stated he would have liked to have seen information regarding cost included in the motion.

Councillor Jepson stated that the motion was about writing a letter and lots of debate on this issue has taken place already and he did not believe it needed to come to Full Council and Councillor Daly did not need a vote in Full Council to write a letter.

Councillor Jepson embraced the principle of the motion, however stated that he was not sure that Full Council was the place to bring the debate.

Councillor Byatt stated that Sizewell C will continue to be a contentious issue and suggested that without the amendment being agreed then it would be difficult to vote in favour as the motion concedes that Sizewell C could go ahead. Therefore, those who were wholeheartedly against could not vote in favour.

Councillor Ninnmey stated there were a number of areas which have been lost to the sea. He raised concern regarding sea defences and the impact of the development. Councillor Ninnmey's ward being situated some distance from Sizewell C still impacts the community. Another issue which had not been worked out or realised was that East Anglia was one of the driest parts of the country and requires its own water supply. It was understood there would be a need for tankers travelling through inadequate roads frequently until suitable infrastructure was completed.

Councillor Ninnmey spoke to Councillor Rivett's earlier speech regarding a presentation attended last winter at Holbrook School. This was delivered by Conservative MPs. They were surprised to know there was a proposal to run lines of pylons from Norfolk through Suffolk and Essex. There was ongoing discussion to move this to a sea route. It was noted that he had a presentation and would be happy to share.

In the 1970's Councillor Ninnmey recalled his mother-in-law was told she resided just outside the area of where iodine tablets would be delivered to residents. Councillor Ninnmey concluded that the Nuclear Decommissioning Authority had previously said that Sizewell A would not be touched until around 2096 and would cost £1 billion to the tax payer as the money set aside was used elsewhere.

Councillor Ninnmey stated he supported the motion.

Councillor Graham stated that it was a pivotal moment and there should be an aim to reach an outcome of least destruction to the environment and communities. The priority should be to reduce energy and improve energy efficiency. This should then be followed by moving away from fossil fuels. Most people support the need for a move away from fossil fuels.

It was stated there are other ways to reach the ambitions of being net zero that are cheaper less resource intensive and more humane. Regarding energy efficiency Councillor Graham highlighted that that 1/3 of energy is lost through building leakage with higher bills for people to pay.

Councillor Graham highlighted the need for the council to be part of the growing movement for sharing energy efficiency information and community engagement.

Councillor Smith-Lyte responded to Councillor Lynch's earlier point and thanked the councillor for his words. Councillor Smith-Lyte stated that it was surprising there were any fish left around the coastline and it would be wonderful to ban trawling in the local area.

Councillor Daly stated that the purpose of the motion was not to write a letter but to open up the debate for all; the public, campaign groups and members to talk openly. Coordination starts now and looks at the real efficiencies and when in consultation

with companies be forthcoming about wanting positive change. Councillor Daly believes there was flexibility in the system to make changes.

Councillor Daly stated he was surprised that some members did not vote to debate and urged those to 'come on board' with the new council and work together to do the best for the local community.

Councillor Ninnmey requested a recorded vote, this was seconded by Councillor Grey and upon being put to the vote, there were more than 7 members in agreement.

The Chair invited the Monitoring Officer to undertake the Recorded Vote for this item. Upon being put to a Recorded Vote, the Motion was **CARRIED**.

The results of the Recorded Vote are shown below:

For the Motion:

Councillors Ashton, Beavan, Bennett, Byatt, Candy, Clery, Craig, Daly, Deacon, Ewart, Fisher, Gooch, Graham, Green, Grey, Hammond, Keys-Holloway, King, Langdon-Morris, Molyneux, Ninnmey, Noble, Packard, Pitchers, Plummer, Reeves, Rumble, Smith-Lyte, Smithson, Specca, Thompson, Topping, Wakeling, Whitelock, Wilson, Yule.

Against the Motion:

Councillors Ashdown, Back, Ceresa, Gee, Hedgley, Jepson, Lawson, Lynch, Mallinder, Patience, Rivett, Scrancher, Starling.

Abstained from voting about the Motion:

Councillor Gandy.

B) Motion submitted by Councillor Peter Byatt

The Chair invited Councillor Byatt to read out his motion.

"This Council recognises that there has been concern for some time about the generally shabby state of some parts of East Suffolk.

This is the culmination of factors that includes frequent fly-tipping (on public and private land); littering in public spaces (streets and parks); dog-fouling; weeds growing out of every possible crevice; overgrown shrubbery ; potholes of every size and shape; dirty, unreadable road signs and gull excrement etc. Together, these have created a general feeling of untidiness and a lack of care in a significant number of areas in the District.

This is unacceptable as East Suffolk should be clean and inviting for all.

Although we welcome the formation of East Suffolk Services Ltd (ESSL) with its new Strategic Waste and Contract Management Team, we believe improved liaison is

required with other tiers of Council and interested bodies to achieve a satisfactory outcome of acceptable standards of cleanliness for our residents and visitors alike.

Improvement in our surroundings cannot be achieved by East Suffolk Council alone. This has to involve those other bodies and requires closer, more formal partnership working with them.

To achieve this, this Council will establish a time-limited Task and Finish Group that will:

Facilitate a more effective working partnership with all organisations concerned with our public spaces

Create a plan of action to deal with this embarrassing situation and

Ensure East Suffolk never reaches this state of dilapidation again."

Councillor Byatt summarised the motion and stated it spoke for itself. Photographs were circulated prior to the meeting by email, these highlighted the issues being raised in the community. Several of the images were taken within 100 metres of the Councillor's home address. Councillor Byatt talked to each image. These included poorly repaired paving, overflowing public waste bins, broken highway signage and overgrown areas of the highway / covering hydrants.

Councillor Byatt highlighted that this work might require the public to become involved in a planned way with a view to a Spring Clean in 2024 and moved the motion.

Councillor Deacon seconded the motion and reserved his right to speak.

The Chair therefore proposed that the Motion be discussed this evening, which was seconded and upon being put to the vote the proposal was **CARRIED**.

Councillor Beavan offered his support to the motion.

Councillor Mallinder stated that civic pride was important, and the previous administration had supported and introduced several carbon footprint reduction initiatives. Working in partnership with other areas to manage bins, there was the Love East Suffolk annual litter pick, encouraging residents to take ownership along with several projects supporting the bee population which now has over 100 sites where grass is cut less. There was a lot of landscaping working around the Melton offices including insect houses, tree planting and wildflowers outside the offices. Councillor Mallinder stated his disappointment in the current condition of the wildflower landscaping.

Councillor Mallinder offered his support for the inclusive motion and encouraged everyone to do the same.

Councillor King advised that that many residents have made contact and most of their concerns were regarding the maintenance of their local area. It was not ideal when they were advised to report it to the other authority. East Suffolk should be a beacon for progress on this matter.

Councillor Patience stated he believed that the issues have become worse under the new administration. Councillor Topping offered and accepted an invite to go and have a look at the areas of concern. He stated that two residents recently cleaned a local car park which he did not believe was their job to do. Councillor Patience raised an issue of getting industrial bins removed.

Councillor Topping thanked Councillor Byatt for the photos. 3 weeks ago there was a walk around Beccles with East Suffolk Services Ltd and Suffolk County Council Highways officers. During this visit there was discussion around who holds responsibility for which parts of the highway in context of weeds and overgrown areas.

Councillor Topping added East Suffolk Services Ltd, which came into operation in July 2023 is currently working their way around the district. It was recognised that this needed to be addressed and they were also working with Suffolk Council. Community engagement was also a part of the bigger picture, asking people to clear outside their own property and place of work would help matters. Suffolk County Council offer a Community Self Help Initiative, which Councillor Topping can provide further information on.

Councillor Topping supported the motion and she would be asking Councillor Paul Ashton to chair the proposed group.

Councillor Pitchers reported a no right turn sign issue in Lowestoft, where vegetation was covering the sign which motorists cannot clearly see.

Councillor Jepson wished to welcome the motion and discussed the 'Broken Window effect' research from New York. There was a need to work strategically with partners to make a difference.

Councillor Ashton agreed with Councillor Jepson's comments and the importance of a strategic approach. Councillor Ashton discussed an issue with a Suffolk County Council road sign in Wangford which has rusted, fallen off and had been propped up at the base. When reported with images the feedback was that remedial action was not required.

Councillor Ashton also stated that customer service was very important and a plan for improvements in this area was underway. Councillor Ashton looked forward to working on this going forward.

Councillor Gooch agreed this subject could be debated all evening and highlighted there was a wider national problem, when compared to countries such as Australia and Canada, where civic pride appeared to be so much higher than here. It was stated a

small number of people cause issues and everyone needs to step forward to challenge littering behaviour. Over 40 years this had not been adequately addressed and we need to look at education, action and engagement.

Councillor Gooch noted the issue where strimmers were used across highways. Litter gets caught in the strimmer and then shredded and spread across the highway.

Councillor Hedgley offered support to the motion and the points raised by Councillor Gooch. Councillor Hedgley took issue with it being said it was the job of other people to have civic pride and urged Members to consider if they were doing their part in their local areas.

Councillor Deacon read out a constituent's email detailing how they love Felixstowe but feel the authority does not. The roads need clearing of weeds, the drains were blocked and comments were received regarding the state of pavements. Pride was needed in local communities. There was a question about public cleaning roads, which could be dangerous.

It was stated this was a legacy problem and Felixstowe was mirrored across the district. There were some improvements thanks to local efforts. However, surface water flooding from blocked gutters cannot be solved by this council alone. He encouraged everyone to support the motion.

Councillor Byatt summarised the motion and that people look to us to solve a problem. There needed to be a time limited task group and this work should be implemented soon so when people come to this beautiful part of the country, we want to be welcoming.

There being no further debate, the motion was put to the vote and it was unanimously **CARRIED**.

9 CIL Reporting and Governance

Councillor Yule, Cabinet Member with responsibility for Planning and Coastal Management, presented report **ES/1666** and reported that in June 2023 the Community Infrastructure Levy (CIL) Charging Schedule report was adopted and discussed by the Cabinet and it was agreed to bring the report to Full Council.

Councillor Yule stated that all Councillors should be aware of the developer contributions received and spent in the East Suffolk area and should understand the projects that have been provided and supported through CIL Funding, together with proposed projects listed in the Infrastructure List of the Infrastructure Funding Statement (IFS) 2022-23.

The Infrastructure Funding Statement was a statutory document which must be produced and published annually by 31 December. This was agreed by Cabinet every autumn before being finalised for publication.

Councillor Yule requested that members utilise the report to engage with their local communities to raise awareness about CIL and engaging people in conversation about how to use CIL funding.

There was an interactive database showing CIL charges which was updated regularly. This was the beginning of the conversations to get this rolling and the importance of engaging with parishes and towns in this process was noted.

This funding was to be spent in the communities on community projects.

Councillor Ninnmey raised a question regarding page 110 which referred to Bungay Medical Practice and a local Integrated Care Board. Councillor Ninnmey had been working on getting appropriate care in the peninsula. At what point can money be raised out of CIL to extend the provision of health care in the peninsula?

Councillor Yule responded that with agreement she would take this question and report back outside of the meeting, so a full and proper response can be provided.

Councillor Byatt enquired if it would be possible to interrogate information down in to ward area. Councillor Yule answered that the database mentioned earlier will provide a parish-by-parish overview.

Councillor Yule moved the recommendation, which was duly seconded and upon being put to the vote it was unanimously

RESOLVED

That the contents of the developer contributions papers and the updated CIL Spending Strategy approved by Cabinet be noted, to further aid councillors' understanding and knowledge of Developer Contributions.

10 Cabinet Members' Report and Outside Bodies Representatives' Reports to Council

Full Council received report **ES/1664**, which was presented by Councillor Topping, Leader of the Council, and provided individual Cabinet Members' reports on their areas of responsibility, as well as reports from those Members appointed to represent East Suffolk Council on Outside Bodies. The Leader stated that the written reports could be taken as read and he invited relevant questions on their contents.

Councillor Mallinder asked Councillor Smith-Lyte if there could be some investigation to whether a temporary bin could be taken out to more rural communities rather than encouraging car use to go to recycling facilities.

Councillor Smith-Lyte responded that there was work on-going in this respect and further updates will be provided in due course.

Councillor Deacon referenced the recent Tour of Britain and stated it was a stunning event for our area and offered thanks to Sarah Shinnie and her team on delivering a very successful event. The question posed was how to capitalise on this success for longer term benefits.

Councillor Graham responded to echo the thanks and praise of Sarah Shinnie and the team involved in putting the Tour together. There was work around engagement, working with shops to advertise, families were able to take part in watching the event and there was a lot of positive feeling about how East Suffolk looked and agreed the momentum to continue this work was needed.

Councillor Deacon asked if the beach hut element of the Felixstowe Beach village will be completed by the end of the month? Completion was due earlier in the year, what has been the delay and how many beach huts have been sold?

Councillor Graham responded to state that she was aware the beach huts have not been selling as well as hoped and this was under review.

Councillor Pitcher asked Councillor Yule what the % increase in planning application fees would be for April 2024.

Councillor Yule responded to say that she would find out this information and report back.

Councillor Patience commented to Councillor Hammond that he was surprised to see this document come through and have no mention of Lowestoft and the parking issues experienced. Councillor Patience offered to meet and discuss this matter.

Councillor Hammond stated that parking was a difficult area and the parking team were launching a series of parking reviews across the region, which will also come to Lowestoft. They were provisionally looking at on street parking but inevitably will consider off street as well. There will be an opportunity for all stakeholders in the town to have their say in more bespoke parking arrangements in consultation, this will be with Suffolk County Council and wider parking work.

Councillor Hammond apologised for any confusion and was happy to follow up with Councillor Patience.

Councillor Byatt stated to Councillor Langdon-Morris that there had been 11 beach huts sold so far and he wondered why they were not being marketed by East Suffolk and how much commission was being paid?

A point of order was raised regarding questions being posed directly from the report. Councillor Byatt apologised.

There was no recommendation in relation to this report, it was just for information.

11 Exempt/Confidential Items

On the proposition of Councillor Specca, seconded by Councillor Topping it was by a unanimous vote

RESOLVED

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

12 Port Health and Implementation of Border Target Operating Model Requirements

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

The meeting concluded at 9.30 pm.

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Chair



FULL COUNCIL

Wednesday, 22 November 2023

Subject	Our Direction 2028
Cabinet Member	Councillor Caroline Topping, Leader of the Council
Report Author(s)	Kate Blakemore Strategic Director Kate.Blakemore@eastsoffolk.gov.uk
Chief Executive	Chris Bally Chief Executive Officer Chris.Bally@eastsoffolk.gov.uk

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

A Strategic Plan sets the out the strategic themes and priorities for the Council as part of the Council's Budget and Policy Framework. It is the key strategic document for the Council in setting the direction of East Suffolk Council.

The East Suffolk Plan 2019-23 was the Council's first ever Strategic Plan and has now reached the end of its term. The purpose of this report is to present the Council's new Strategic Plan, Our Direction 2028, to Council, as recommended by Cabinet on the 7th November 2023.

Options:

- 1) To approve the Our Direction 2028 as laid out in Appendix A of this report, as the Council's Strategic Plan for the next four years.
- 2) To make amendments to the Strategic Plan, Our Direction 2028 and subsequently approve the amended Strategic Plan, Our Direction 2028.
- 3) To not approve the Council's Strategic Plan, Our Direction 2028.

Recommendation:

That Council approves the Strategic Plan, Our Direction 2028, as set out in Appendix A of this report, as the Council's Strategic Plan for the next four years.

Corporate Impact Assessment

Governance:

The delivery of Our Direction 2028 will be supported by a governance framework which will include annual action planning and performance management.

ESC policies and strategies that directly apply to the proposal:

A Strategic Plan sets the out the strategic themes and priorities for the Council as part of the Council's Budget and Policy Framework. It is the key strategic document for the Council in setting the direction of East Suffolk Council for the next four years.

Environmental:

Environmental Impact is one of the four themes outlined within Our Direction.

Equalities and Diversity:

This Strategic Plan seeks to achieve inclusion and equality both within our workplace and across all our Communities in East Suffolk. No negative impact on any of the characteristics protected under the Equality Act 2010 are identified as a result of the new Strategic Plan.

Financial:

Approval of a Strategic Plan is required as part of the Council's Budget and Policy Framework.

Legal:

The Councils constitution outlines the need to have the Councils objective and priorities contained within a central document.

Risk:

The Council's Corporate Risk Register will be updated to reflect any specific risks associated the delivery of Our Direction 2028, in the same way that it does with the current Strategic Plan.

External Consultees:	Multiple - as part of the consultation process for the development of this Strategic Plan
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Strategic Plan Priorities

The East Suffolk Plan 2019-23 was the Council’s first ever Strategic Plan and has now reached the end of its cycle. Work has therefore been undertaken to update, build on and enhance this plan, and Our Direction 2028 presents four key themes, each with a number of supporting priorities. If approved, it will become the Council’s key strategic document, setting the direction of East Suffolk Council over the next four years.

Background and Justification for Recommendation

1 Background	
1.1	A Strategic Plan sets the out the strategic themes and priorities for the Council as part of the Council’s Budget and Policy Framework. It is the key strategic document for the Council in setting the direction of East Suffolk Council for the next four years.
1.2	The East Suffolk Plan 2019-23 was East Suffolk Council’s first ever Strategic Plan and has now reached the end of its cycle. Work has therefore been undertaken to update and build on this this plan and to reflect the ambitions of the new Green, Liberal Democrat & Independent (GLI) Group administration.

2 Introduction	
2.1	In developing our new Strategic Plan “Our Direction 2028”, work has been ongoing in terms of drafting this document and working collaboratively to reflect and refine it based on feedback from all Members, officers, stakeholders, and residents.
2.2	<p>Our Direction 2028 is a strategic-level document and therefore it’s about the path we are embarking on together, collaboratively, over the next four years; an ambitious approach, creating that golden thread and setting targets to help us deliver what we aim to achieve by 2028. Our Direction 2028 sets out a vision and four associated themes, under which several priorities have been defined. The visions and themes are:</p> <p>Vision: Our aim is to promote a bright, green, open, free, and fair future for all East Suffolk</p> <p>Themes:</p> <ul style="list-style-type: none"> ● Environmental Impact Delivering positive climate, nature, and environmental impacts through the decisions we make and actions we take. ● Sustainable Housing All homes in East Suffolk are safe, suitable, and sustainable, in communities where residents are proud to live.

	<ul style="list-style-type: none"> • Tackling Inequalities Improving quality of life across the district by tackling financial, social and health inequalities. • Thriving Economy Enabling residents to benefit from, and contribute to a thriving, economy.
2.3	All four themes are connected and provide the overarching principles for the way in which the Authority will work as a whole – rather than being seen in isolation, the plan aims to present the themes and priorities as the ethos under which decisions will be made and the direction the authority will travel over the next four years.
2.4	Within each theme, key priorities are identified. These statements guide what is important to the Council and provide a steer on the areas which will be focused on within each theme. Our Direction 2028 can be found at Appendix A to this report.

3 Development of the Strategic Plan	
	Annual Strategic Plan Progress Report 2023
3.1	The East Suffolk Plan 2019-23 was East Suffolk Council’s first ever Strategic Plan, in nearing the end of its cycle consideration was given to what was achieved over the last year as part of the Council’s annual Strategic Plan report 2023, along with what was achieved over the whole lifetime of the Plan, considering what a new Plan could build on, accelerate and change focus on in terms of the GLI Groups own priorities.
3.2	<p>In summary for 2023 good progress was achieved within the following major projects:</p> <ul style="list-style-type: none"> • Business cases were completed, and funding approved by Department of Levelling up, Communities and Housing (DLUCH) for various elements of the Lowestoft Towns Fund Programme to deliver the transformational regeneration objectives for the town with all projects moving to/currently going through detailed design. • The first two work packages of the Lowestoft tidal flood defence barrier have progressed including engagement with businesses and community. • UK Shared Prosperity Fund investment plan was approved in November with year one projects all underway. • Our Ease the Squeeze campaigns under the Cost-of-Living programme identified almost £1 million of funding and delivered on-the-ground support including warm rooms, food-related projects and help with financial matters such as budgeting, access to benefits and grants. • A large programme of work to establish a new trading company, transferring services from the Norse Joint Venture has progressed during the 22/23 year.

	<p>East Suffolk Services Ltd has been established and went live on the 1st June 2023.</p> <ul style="list-style-type: none"> • The Deben Fields development at the former Deben High School site has progressed, with the demolition phase complete and the development management company appointed. • The Kitchen@Felixstowe (now known as the Sea You café) was completed in May 2022 as part of the Felixstowe Development programme. • All eight Community Partnerships across the district supported and delivered projects against priorities identified at a local level and more than 140 projects were funded in communities as part of our Community Grant Schemes. • Our Digital Towns implementation is complete – installing public wi-fi and footfall counters in eleven market towns across the district. • Refuse vehicles using greener HVO fuel and EV Pool cars are now on stream.
3.3	<p>Areas requiring further work have also been identified, plans have been developed to address these issues which are in summary:</p> <ul style="list-style-type: none"> • New homes delivered across the district as part of our overall delivery of new homes within our local plan are slightly lower than targeted, due to challenges in the wider economy. • Delays to our own Housing Development programme means moving some completions into the next financial year or beyond, however a review of the capital programme is underway and reviews taking place to address delivery. • Housing regulation issues reported, and a plan put in place to fully address all areas. • Our waste collection figures for recycling and composting are lower than targeted, however there are plans in place to address service needs with the implementation of our trading company. <p>The Annual Strategic Plan summary report 2023 can be found at Appendix B of this report.</p>
	GLI Group Priorities
3.4	<p>In forming the administration of the Council following the local elections in May 2023 the GLI Group developed four key themes for East Suffolk, scoping out several priorities under each theme, prior to undertaking a wide range of consultation to enable these themes and priorities to be further finalised and captured within Our Direction 2028.</p>
	Consultation
3.5	<p>Whilst the themes were initially developed by the GLI group, including an initial set of priorities, much has happened in way of consultation with all Members, Officers, residents, and stakeholders to further develop and finalise the themes and priorities outlined in Our Direction 2028.</p>

3.6	<p>This consultation has included:</p> <ul style="list-style-type: none"> • All Member briefing and ongoing discussions across all political groups. • Strategic Plan discussion at Scrutiny and Overview Committee in September 2023. • Corporate Leadership engagement sessions. • Online CEO staff briefings. • Staff engagement roadshows. • Press release and launch of an online survey for residents and stakeholders to complete. • Letters sent to key stakeholders asking for feedback.
3.7	<p>Feedback from staff and Members included clarification questions, suggested improvements in language, merging of and additional priority suggestions, alongside a significant number of ideas for action in terms of how the Plan can be subsequently delivered over the next four years.</p>
3.8	<p>Feedback from residents and stakeholders included a total of 380 online survey responses, with 89% of these responses coming from residents in the district. A summary of these responses is attached as Appendix C to this report and identifies which priorities under each theme are most important for our residents and stakeholders.</p>
3.9	<p>Interestingly areas of the survey also aligned with internal staff and Member feedback regarding additional priorities, clarification of language and ideas for action in terms of delivering this Plan. This feedback has been addressed as part of the finalisation of Our Direction 2028.</p>
Our Foundations	
3.10	<p>Our Direction 2028 is the Council’s blueprint for success over the next four years, and in delivering this Plan we recognise the importance of the solid foundations that are critically important to any successful local authority. As such we will remain committed to providing excellent quality services for our residents including the delivery of our core statutory services, always operating within a financially responsible way.</p>
3.11	<p>We will always listen to our residents and commit to engaging with them whenever possible. We will also find innovative ways of doing this, especially for residents that are less likely to engage with us and are harder to reach.</p>
3.12	<p>We will ensure our customers find it easy to do business with the council. On every occasion people interact with the council, it must be as easy as possible and we will always adopt a solution-focussed approach.</p>

3.13	Finally, we will always measure and reflect on our performance, including how we deliver this plan as part of Our Direction 2028. We will ask what our communities think in a variety of different ways, including our regular residents’ surveys, and take action when things are not going so well.
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4 Governance

4.1	<p>To govern the direction of the authority, using the Strategic Plan as the steering document, work has been undertaken to evolve the current governance framework to continue to provide oversight of overall performance and delivery against the Strategic Plan. This achieves several aims:</p> <ul style="list-style-type: none"> • Oversees the programme of work feeding into each theme. • Steers the activities of the Council to ensure they are delivering to the plan. • Monitors progress of delivery to the key priorities within each theme. • Monitors, understands, and challenges performance. • Monitors risks which may compromise delivery of strategic objectives.
4.2	Governance arrangements will include the development of an annual action plan that will contain the high-level programme of work that the Council will undertake to deliver against its strategic themes and how we will monitor to ensure the Council is moving in the right direction.
4.3	The governance arrangements will also include clear Key Performance Indicators (KPI’s) at a strategic level, that will be regularly monitored, reported and available to internal and external stakeholders.
4.4	Progress against this action plan will be reported annually in the form of an annual report.
4.5	Organisationally, to ensure the “golden thread” of the Strategic Plan runs throughout the organisation, annual service planning linked to the themes of the strategic plan, and its underlying governance structure, will be in place and complimented by service-level performance and appraisals.

5 Reason/s for recommendation

5.1	The East Suffolk Plan 2019-23 was East Suffolk Council’s first ever Strategic Plan and has now reached the end of its term. Work has therefore been undertaken to update and build on this this plan and to reflect the ambitions of the new Green, Liberal Democrat & Independent (GLI) Group administration.
5.2	Our Direction 2028 is the key document for the Council in setting the direction of East Suffolk Council for the next four years and following on from significant consultation and further development and finalisation of Our Direction 2028, this Strategic Plan is presented to Council for its approval.

Appendices

Appendices:	
Appendix A	Our Direction 2028
Appendix B	Annual Strategic Plan summary report 2023
Appendix C	Online Survey Responses Summary

Background reference papers:	
None	



EASTSUFFOLK
COUNCIL

OUR

DIRECTION

2028

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Cllr Caroline Topping, Leader

I was incredibly honoured to have been elected as Leader of East Suffolk Council and to be its first female Leader. This is a truly beautiful and vibrant part of the world and I am proud, as a resident, to serve you all.

After many years of Conservative Administration at Suffolk Coastal, Waveney and East Suffolk Councils, our residents voted for change. Our communities have put their trust in us, and we will do our best to deliver what they want us to achieve.

We fully appreciate how worried people have been about tackling the cost-of-living crisis which has hit our communities really hard. People can't find affordable housing; they are worried about their town centres with shops and banks closing, and they are worried about the environmental legacy we are leaving for our children, with the threat of climate change already evident.

Therefore, this Green, Liberal Democrat and Independent Administration, working collaboratively with all Members, staff and important stakeholders will operate on the basis of clear priorities which reflect our shared values. These priorities are presented here in 'Our Direction 2028', our plan for the next four years.

The Council is ready for an exciting and ambitious new phase, and Our Direction has seen the original East Suffolk Plan evolve, with a refreshed and refined approach, reflecting the political ambitions of the new Administration.

Our Direction 2028 is about the path we are embarking on together, collaboratively, over the next four years. We are taking an ambitious approach and have sought the views of local people to create this Plan. We are working with and empowering communities and individuals to conserve what we love about our District, improve services where we need to and adapt to our changing environment to ensure the District is in the best place possible in 2028.

Over the next few pages, we will explain exactly what we are seeking to achieve and the standards to which we expect to be held. It will no doubt be challenging, but also exciting and on behalf of all councillors I can guarantee that we will do our very best at all times.

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Chris Bally, Chief Executive

'Our Direction 2028' comes at a time of great challenge and opportunity for the district and the organisation. East Suffolk Council has made huge strides since 2019, delivering against the Council's first ever Strategic Plan achieving, real progress in the district.

We have welcomed considerable funding to deliver major projects and throughout East Suffolk there are examples of important schemes and activities being delivered by the Council or in partnership with other key stakeholders.

2023 has been a year of significant change, with a new Chief Executive and Administration. However, the energy, resilience and positivity shown in taking this change in its stride and continuing to deliver excellent public services is a testament to all who work for the Council.

Looking ahead, we have an exciting four-year agenda. The new Green, Liberal Democrat and Independent Administration of the Council recognise the progress that has been made, but also know that they have been chosen by the electorate. They want to deliver a renewed focus on the environment and an economy that works for all in the district, addressing inequalities and tackling the housing challenge appropriately across the District.

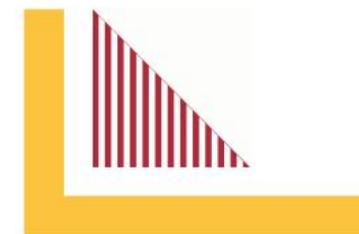
Alongside this, at our core, is maintaining the quality of services day-in day-out and ensuring the council is governed well and delivers effectively and efficiently. We are also ready to look at things afresh, as demonstrated by the creation of trading vehicles such as East Suffolk Services Limited and East Suffolk Lettings, plus the adoption of technology through our Digital Towns work.

However, we know we cannot do this alone and welcome continued excellent working relations with other councils in Suffolk, health and police partners, the business and voluntary sectors, and central government. This is typified by our innovative Community Partnership model which will develop further to create a thriving network of projects and initiatives.

I am incredibly proud to be the Chief Executive of East Suffolk and proud of the commitment, energy and ingenuity that our officers and teams put into delivering outstanding services around the clock. Excellent planning, building control, environmental health, housing, leisure and so much more only happen because of the people dedicated to serving our communities. They are united in their purpose whether they are directly delivering services or supporting those who are engaged in that delivery to achieve the best for East Suffolk.

OUR DIRECTION 2028

Our aim is to promote a bright, green, open, free, and fair future for all East Suffolk





EAST SUFFOLK IN CONTEXT



Population of
around
250373



Around
487
square miles



115
square miles
of AONB



49
miles of
coast line



15.54%
19 or under



27.71%
65 or over

- Natural beauty
- Heritage
- Arts
- Beach
- Ports
- Market town
- Wind energy
- Nuclear energy
- Coastal protection
- A12 Roads
- Rail



11.3% of our population are affected by income deprivation, higher than the Suffolk average of 10.2%



19,638 people were claiming universal credit in July 23



Approximately **4000** planning applications per year



45% of waste collected sent for recycling or composting



2000 fly tipping incidents per year



13,000 properties pay Government-set business rates, which we administer



We collect waste and recycling, administer Council Tax, and more, from over **127,000** properties in the district



Food hygiene ratings **98.75** at rating 3-5



Over **1 million** ESC-owned leisure centre visits, year to Spring 2023

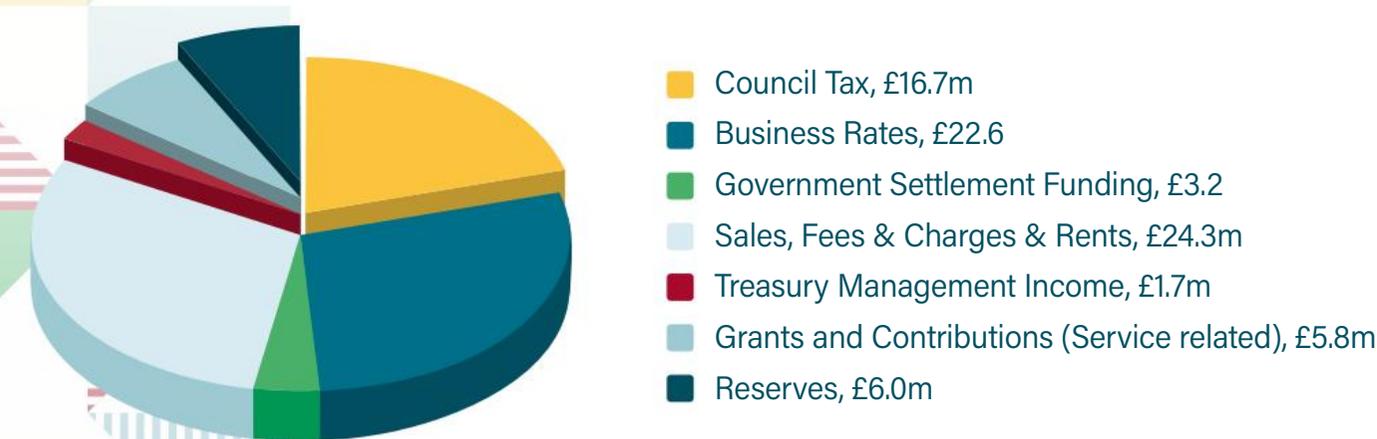


£13.8m in successful grant funding – 94% of applications, year to Spring 2023

How our Council Services are Funded

In 2023/24 East Suffolk Council had a net budget of £80.3m. East Suffolk Council's services are funded from a mix of sources including Council Tax, Business Rates, income from Fees and Charges and a small grant from Government. Between 2015/16 and 2023/24 the amount the Council received from Government fell from £8.04m to £3.23m as part of the Government's austerity programme.

The Council is increasingly reliant on locally generated funds from Council Tax, business rates and fees and charges. The ability to generate income from charges for its services is increasingly important to support the Council's strategic objectives. This provides a third of the total funding to Council.



Where the Money is Spent (net budget £80.3m in 2023/24)





Financial Management

East Suffolk has a good record of budget and financial management and continues to protect front line services. Good financial governance ensure that emerging budget pressures are kept under review during each year, and this has been particularly important following the Covid-19 pandemic, a period of high inflation and the cost-of-living crisis.

We review key contractual arrangements and are very active in securing external grant funding. Meanwhile, the Council held unallocated reserves of £6m at the start of 2023-24, with earmarked reserves of £45m.



Capital Programme

In addition to the revenue budget, the Council has a capital investment programme which supports delivery of the Council's strategic direction and to carry out necessary health and safety works. For 2023/24 the budget programme of capital projects totals £113m, with £73m funded from external grants and a 4-year capital programme of £370m (£260m from external grants) over the period of the Medium Term Financial Strategy.



Housing Revenue Account

Over and above the money spent by the Council as part of its General Fund, the annual income from the Council's housing stock, is in the region of £22m and is ring-fenced for re-investment into the provision of housing services, support for tenants and investment in the existing stock and new housing.

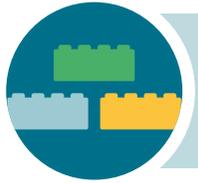


Financial Challenges to 2028

During the period of this Plan, maintaining a balanced budget will be pushed to the limit. The demand for Council services arising from a number of pressures including the cost-of-living crisis and our climate emergency will increase and it is likely the Council will face significant challenges to its income streams. Our commitment to reach net zero by 2030 and new legislation including, for example, in areas of housing regulation will put further pressure on budgets.

Following a period of high inflation, the costs for goods and services has increased and supply chain pressure will continue to impact on the Council's capital programme. The implications of the UK leaving the European Union will continue to affect the Council, not least the Port Health Authority as we implement the new Border Target Operating Model.

The absence of multi-year settlements, delays to the Fairer Funding Review and the re-set of the business rates system, does not provide the certainty to plan for financial sustainability. However we understand these challenges and commit to addressing them over the next four years.



Our Foundations

Our Direction 2028 is the Council's blueprint for success over the next four years, and in delivering this Plan we recognise the importance of the solid foundations that are critically important to any successful local authority.

We will continue to provide excellent quality services for our residents, whether it's working with Anglia Revenues Partnership to deliver our revenue and benefits services, ensuring hygiene standards are maintained by our Port Health Team who check that imported foods are safe, through hygiene inspections at your favourite café or providing access to our fabulous beach huts along our coastline.

The delivery of our day-to-day functions will always remain an unwavering priority.

We will always listen to our residents and commit to engaging with them whenever possible. We will also find innovative ways of doing this, especially for residents that are less likely to engage with us and are harder to reach.

We will ensure our customers find it easy to do business with the Council. On every occasion people interact with us, it must be as straightforward as possible and we will always adopt a solution-focussed approach.

Digital Technology plays a key role in how we work as an organisation, and it is vital we continue to invest in the right technology to enable the council and the district to thrive. In doing this, we are also committed to ensuring that those who cannot access digital services themselves are not excluded.

We will use digital technology to ensure our services are efficient, secure and data-led – and we will capitalise on the benefits of greener ways of working, using technology.

Finally, we will always measure and reflect on our performance, including how we deliver this plan as part of Our Direction 2028. This includes undertaking robust internal audits accross all our service areas.

We will ask our communities what they think of us in a variety of different ways, including through our regular residents surveys, and we will always take action when things are not going so well.



Our Values

We want our workforce to be the best they can, delivering the best possible services to those who need us most. Our People Strategy maps out how we want to develop our people, ensuring they have the right skills and training to do their jobs well.

East Suffolk Council has five core staff values which lay the foundation for the way our people work, engendering a common purpose that everyone understands, buys into and embodies in all they do.



Equalities, Diversity, and Inclusion

We are fully committed to Equality, Diversity, and Inclusion in all that we do. We will strive to ensure a supportive and inclusive culture amongst our workforce, promoting diversity and eliminating all forms of unlawful and unfair discrimination.

We will not provide less favourable services, facilities or treatment on the grounds of protected characteristics. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, race (including ethnic origin, colour, nationality and national origin), religion or belief, or sex and sexual orientation. The District Council also includes socio-economic factors in addition to the protected characteristics.

The Council is proud to have signed up to Unison's Anti Racism Charter and we have further reinforced our commitment to Equality, Diversity and Inclusion, by developing a four-year action plan to ensure that it remains integral to all we do.





Delivering positive climate, nature, and environmental impacts through the decisions we make and actions we take.



Continued commitment to net zero by 2030

We are committed to achieving net zero as a Council by 2030, and working collaboratively to deliver this for Suffolk, focussing and investing in this transition while protecting our core services.



Work in partnership to manage coastal adaptation and resilience

In the face of great threats to East Suffolk's coastline, we will work in partnership with stakeholders and communities to manage coastal adaptation and create resilience wherever possible.



Supporting sustainable transport

We will support sustainable transport – delivering our own Cycling and Walking Strategy whilst working hard with our partners enabling people to use public transport and travel in an environmentally sustainable way.



Focus on reduction, re-use and recycling of materials

Through our own practices and by encouraging others, we will focus on the reduction, re-use and recycling of materials, including the eradication of single use plastics.



Restoring ecosystems and biodiversity

We are committed to restoring ecosystems and biodiversity, through rewilding and tree planting, enabling landowners to follow our lead. We will set ambitious biodiversity net gain targets and encourage improvement.



Encourage food self-sufficiency

We will reduce food waste and encourage more local food production, including community growing schemes, to reduce food miles. We will support residents and community groups to develop food practices which move away from chemical control.



Support, promote and implement green tech

We will implement and support decarbonising, electrifying and greening technologies to create energy across the district, contributing to local and national energy infrastructures.



Preserve and maintain the district's beauty and heritage

We will seek to preserve and maintain the inherent beauty and attraction of East Suffolk including its natural landscape and conservation areas, historic environment and cultural heritage, retaining its unique selling points for generations to come.



SUSTAINABLE HOUSING

All homes in East Suffolk are safe, suitable, and sustainable, in communities where residents are proud to live.



Deliver the right housing based on our communities' need

We want to deliver and support the right housing developments in the right locations based on all residents' housing needs, with more affordable homes including social rent and better first-time buyer opportunities.



Promote housing developments which enhance wellbeing and protect the environment

We want housing developments that enhance wellbeing with high quality infrastructure, green spaces; encouraging sustainable transport where possible, using master planning to engage with our residents.



Tackle fuel poverty and support new heating technologies

We will strive to help end fuel poverty and deliver more sustainable housing, including our own stock. We will take advantage of funding opportunities for new heating technologies, including for the installation of solar panels, improving insulation and installing heat pumps.



Reduce and prevent homelessness

We will continue to work hard for those that are at risk of becoming homeless to prevent this from happening, alongside supporting people who are homeless back into suitable accommodation.



Promote community pride in homes and neighbourhoods

We will promote community pride in our homes and neighbourhoods to help people respect and enjoy where they live and to help maintain and improve quality of life standards.



Add to, improve and make better use of our housing stock

By converting unused public buildings into housing units, developing upper floors of retail units, or bringing empty homes back into use we will make sensible use of what we have, to provide suitable housing for our residents.



Encourage more self-build housing in East Suffolk

We will seek to encourage more self-build housing in East Suffolk as a means to create homes in an environmentally sustainable way.



Improving quality of life across the district by tackling financial, social and health inequalities.



Use local data to design and deliver services

We will use local insight and data to target inequalities that exist across our district, ensuring that we adapt the design and delivery of our services accordingly to support communities and individuals appropriately.



Work with partners to better understand need

We will continue to work collaboratively with partners, including those in the voluntary, community, faith, and social enterprises (VCFSE) and public sectors, to understand the needs of our residents, enabling them to help themselves.



Prioritise early help to support residents

We will further develop our Community Help Hub model and other preventative approaches to provide early help, ensuring we engage quickly to better support our residents during difficult times.



Digitally enable our communities to help residents in need

We will address a lack of digital inclusion which can drive inequality to help all our communities better access online services, including those that are designed to support residents when they are in need.



Efficiently deliver benefits and grants to residents

We will ensure residents and businesses understand what benefits and grants they are entitled to and ensure, if provided by us, that they receive exactly what they are entitled to in a timely and efficient manner.



Further develop Community Partnership model

We will continue to develop our Community Partnership model to ensure that it supports our residents, tackles inequalities and strives for a district that is fully inclusive and increases engagement.



Reduce health inequality and improve wellbeing

We will play an active role in reducing health inequalities and improving mental and physical health and wellbeing, ensuring residents have access to services, and ability to choose, that encourage healthy behaviours.



Take action to improve community safety and reduce ASB

We will take action to improve community safety throughout the district and strive to address and reduce anti-social behaviour and its impacts on residents.



Enabling residents to benefit from, and contribute to, a thriving economy.



Empower residents to build the right career skills

We want to work with partners to ensure our residents build and possess the right career skills for current and future employment opportunities across the district.



Encourage creativity and enterprise, and support start ups

We will encourage enterprise, innovation and creativity, in our population to ensure they have the tools to start up and grow their businesses, and we will celebrate all that's made and produced within our district.



Support businesses to eliminate waste and recycle more

We will work with business to decarbonise and be more sustainable, creating the conditions for business longevity, while protecting our precious environment by increasing a product's lifespan to eliminate waste and pollution.



Ensure Local Plans work for local people

We will ensure that our Local Plans will work for local people, as part of a vision to provide them with affordable housing, good public services, and a healthy environment, so that East Suffolk continues to be a great place to live and work.



Encourage investment in East Suffolk's key sectors

We will encourage investment in the key sectors which reflect East Suffolk's strengths bringing employment and prosperity.



Increase the economic viability of our towns

We will encourage place-based development to ensure we increase the viability of our Town Centres and Market Towns, ensuring they provide for our residents, businesses, and visitors, contributing to a thriving economy.



Community wealth building by working with local companies

We will work with local companies, cooperative businesses, and social enterprises, getting maximum benefit from our spending and contracting, to encourage Community Wealth Building and the reinvestment of wealth within East Suffolk for the benefit of our residents.



Ensure our residents can benefit from national infrastructure projects

We will work hard to ensure our residents benefit from Nationally Significant Infrastructure Projects, adopting policies that encourage investment which supports impacted communities.



Support responsible tourism and visitor economy

We will support and seek to strengthen tourism and the visitor economy, while encouraging an understanding of responsible activities which reflect our environmental priorities and ambitions.

HOW ARE WE DOING?

Our Direction 2028 sets out the themes and priorities for East Suffolk Council across the next four years. However, it is important that we are then seen to deliver against these priorities, ensuring real, tangible outcomes for all our communities.

Therefore, we will develop an action plan to measure exactly what we are doing and what we have achieved. It will be clear and transparent, reflecting our determination to make a genuine difference.

To follow our journey, please head to:

 www.eastsuffolk.gov.uk/ourdirection2028



East Suffolk Council

Annual Report 2022/23

Summary



This shorter report summarises the performance and delivery of objectives for the 2022/23 financial year, in line with the East Suffolk Council [Strategic Plan \(2020 to 2024\)](#). Our detailed Performance Report provides full, detailed information about all performance measures and action plans.

The Strategic Plan was developed collaboratively in 2019, in the form of a three-day [hothouse](#); drawing together views from a wide range of attendees (councillors, officers and partners) to produce a new Strategic Plan for the newly-formed East Suffolk Council.

The Strategic Plan (2020 to 2024) has five themes, each of which contains a number of priorities, steering the organisation to deliver to the needs of the district. The overarching themes are:



GROWING OUR ECONOMY - Let's build a strong sustainable economy for our future; we want our district to achieve its maximum potential, for the good of everyone in the area.

ENABLING OUR COMMUNITIES - Working together, we will enable our communities to identify opportunities and challenges, we will empower them to make a difference; we will support our communities to enhance the places we live and work for the well-being of all.

REMAINING FINANCIALLY SUSTAINABLE - We will grow and prosper as a council; we will ensure we are well-run; provide value for money and strive for excellence.

DELIVERING DIGITAL TRANSFORMATION - Digital technology can transform the way we work and live; we will use technology to make services efficient and easily accessible to all and assist our communities to embrace and access new technologies.

CARING FOR OUR ENVIRONMENT - We know you are concerned about our environment; we are too, so we will put the environment at the heart of everything we do.

We have embedded our priorities and objectives across the organisation to ensure the Strategic Plan guides everything we do. All services, tasks and projects link through to priorities outlined in the Plan. We have an action plan to deliver against each theme and have established methods to measure our performance as an authority. This will be the last performance report against this Strategic Plan as it has reached the end of its lifecycle and a new plan is in development.

Leading into the 22/23 financial year we established a Core Programme for each theme, presenting the projects and initiatives we are undertaking. We subsequently established a new set of Key Performance Indicators (KPIs) over the course of 22/23, culminating in the publication of [live dashboards for each theme](#) in March 2023, to monitor and measure how we are performing. Please note, work on the development of all KPIs is still taking place and will be amended to reflect the next iteration of the Strategic Plan.

The live dashboards are available at any given time, via our website, providing up-to-date performance information in a transparent way. They have been developed using a product called PowerBI and we are one of only a handful of councils (at the time of writing) utilising this method of publicising performance data in real-time, including trends and year-on-year data where available.

The full Performance Report captures our position in detail for each of the five themes, in turn, at 31 March 2023, giving a breakdown of KPI data and a high level overview of the core programme delivery for the year. The following provides a summary of some significant areas within the full report:

Good progress within the following **major projects** to deliver to the expected outcomes and timelines:

- Business cases completed and funding approved by DLUCH for various elements of the Lowestoft Towns Fund Programme to deliver the transformational economic regeneration objectives for the town with all projects moving to/ going through detailed design.
- The first two work packages of the Lowestoft tidal flood defence barrier have progressed including engagement with businesses and community.
- UK Shared Prosperity Fund investment plan was approved in November with year one projects all underway.
- Our Ease the Squeeze campaigns under the Cost-of-Living programme identified almost £1 million of funding and delivered on-the-ground support including Warm Rooms, food-related projects and help with financial matters such as budgeting, access to benefits and grants.
- A large programme of work to establish a new trading company, transferring services from the current Norse Joint Venture, has progressed during the 22/23 year. East Suffolk Services Ltd has been set up and the aim is for seamless transition of services in the following year.
- The Deben Fields development at the former Deben High School site has progressed, with the demolition phase complete and the development management company appointed.

The following **major projects** have been **completed** to agreed schedules:

- The Kitchen@Felixstowe (now known as the Sea You café) café completed in May 2022 as part of the Felixstowe Development programme.
- All eight Community Partnerships across the district supported and delivered projects against priorities identified at a local level.
- More than 140 projects were funded in communities as part of our Community Grant Schemes
- Plans to ensure our digital infrastructure is robust and resilient have been executed.
- Upgrades and enhancements to major business systems have been completed, including our GIS and finance systems.
- Our Digital Towns implementation is complete – installing public wi-fi and footfall counters in eleven market towns across the district.
- Our PowerBI enhancements have enabled us to publish performance dashboards publicly.
- Refuse vehicles using greener HVO fuel and EV Pool cars are now on stream.

The following areas reported some **issues**; however plans are in place to address:

- New homes delivered across the district as part of our overall delivery of new homes within our local plan are slightly lower than targeted, due to challenges in the wider economy.
- Delays to our own Housing Development programme means moving some completions into the next financial year or beyond, however a review of the capital programme is underway and reviews taking place to address delivery.
- Housing regulation issues reported, and a plan put in place to fully address all areas.
- Our waste collection figures for recycling and composting are lower than targeted, however there are plans in place to address service needs with the implementation of our trading company.

Due to the economic climate and significant changes to major schemes in the current Capital programme, a mid-year revised General Fund Programme was presented to Cabinet and approved by Full Council in September 2022. This re-shaped our capital programme to account for some of the issues outlined.

Key Performance Indicators summary – see full report for detail.

Please note our KPIs are still evolving, this is the first reporting year of the newly established set of KPIs and therefore, in many instances, targets have not been fully set until we have year on year comparable data. More information on each KPI can be found in the full performance report.

Theme	KPI	Target	Actual	Status
Economy	Net number of new dwellings delivered	916	813	
Economy	Net development of employment sites	<i>Figures published later in year</i>		
Economy	Net number of businesses	KPI to be developed further		
Economy	Town Centre and Visitor Footfall*	Implementation	Complete	
Economy	Planning decisions			
	Major apps determined within 13 weeks	60%	87.5%	
	Non-major apps determined within 8 weeks	70%	79.14%	
Economy	Visitor Economy Value	KPI to be developed further		
Economy	Workforce Skills	KPI to be developed further		
Economy	Demonstrate CIL spending	See detail	£1.71m	
Communities	Community Partnerships	See detail	196 projects delivered	
Communities	Reducing community inequalities			
	Customer engagement	See detail	2900	
	Wellbeing projects delivered	See detail	136	
Communities	Community Pride – star rating	TBD	3.66 /5 stars	TBD
Communities	Increasing participation in leisure activities	<i>Figures published later in year</i>		
Communities	Quality of accommodation	KPI to be developed further		
Communities	Access to suitable housing	KPI to be developed further		
Communities	Food Hygiene - Rating of 3 to 5	95%	98.52%	
Communities	Port Health performance to ISO 9001	See detail	1 improvement	
Financial	Budget Gap	See detail	On track	
Financial	Reserve sustainability	See detail	On track	
Financial	Savings achieved	See detail	On track	
Financial	General Fund asset performance ratio	1:1	1:0.68	
Financial	Housing Revenue Account	KPI to be developed further		
Financial	Business Rates collection	£225.47m	£201.27m	
Financial	Council Tax collection	£172.58m	£174.71m	
Financial	Treasury Management	See detail	On track	
Digital	Cyber security breaches	0	0	
Digital	IT incident resolution			
	Resolved within 9 working hours	70%	78.1%	
	Resolved within 1 working week	85%	90.1%	
Digital	Customer satisfaction with online services	4-star rating	4.38 /5 stars	
Digital	Digital Towns delivery*	Implementation	Complete	
Digital	Digital take up of our services	KPI to be developed further		
Digital	Overall Customer Satisfaction	KPI to be developed further		
Environment	East Suffolk Council total emissions	Net zero by 2030	On track	
Environment	Household waste collection			
	% sent for recycling and composting	44.6%	38.9%	
	Residual waste per household (kg)	460.1kg	474.5kg	
Environment	Energy rating of council assets			
	Housing assets (C or above)	See detail	36.2%	TBD
	General Fund Assets (D or above)	See detail	81.43%	TBD
Environment	Fly tipping incidents	TBD	1595	TBD
Environment	Biodiversity net gain	KPI to be developed further		
Environment	Coastal Management	KPI to be developed further		

*KPI for first year focuses on delivery of project, KPI targets will be set in subsequent years

Appendix C

Results and feedback from ‘Our Direction 2028’ consultation

General Analysis

A consultation survey was available online and in hard copy (by request) from 21 September through to 15 October 2023. The survey was promoted on our website and across social media platforms. It was also specifically sent to local stakeholders including Town and Parish Councils.

Total number of survey responses we received was **380** responses.

Respondents can be broken down as follows (more than one value may be selected per respondent):

Living in East Suffolk	291
Working in East Suffolk	108
Representing a parish or town council in East Suffolk	65
Representing a voluntary sector organisation working in East Suffolk	26
Running a business in East Suffolk	39
Representing a public sector partner working in East Suffolk	13
A visitor to East Suffolk	8
Skipped question	53

Overarching Feedback

Across all segments of the consultation, there have been running topics of conversation and feedback in the following areas:

- Maintaining the character of the region.
- Getting the right infrastructure in place for the district.
- Ensuring we are addressing local needs.
- Transport, particularly in rural areas.
- Addressing weeds and litter, ensuring people take pride in their surroundings.
- Questioning what sits at District Council in terms of our responsibilities, and what may be broader responsibilities.

Many of these issues are already covered as part of the additional commentary provided in the full strategic plan document, however because of the consultation, some priorities originally proposed have been reviewed and amended, and included in this appendix within each theme are some examples of how we have used feedback to further shape the plan.

In response to the above feedback outlined across all areas, the following priorities have been added to the Strategic Plan to address some specific common threads:

- **Preserve and maintain the district’s beauty and heritage.**
- **Promote community pride in homes and neighbourhoods.**

Further amendments and additions to the plan are outlined against feedback for each theme below.

Environmental Impact Theme

Q1: What would you consider our most important priorities in our Environmental Impact theme?

(Respondents could select as many options as they wish, percentages reflect the number of respondents selecting that priority)

Supporting sustainable transport	52.37%
Restoring ecosystems and biodiversity	48.68%
Work in partnership to protect our coastline	47.11%
Continued commitment to Net Zero by 2030	43.68%
Support, promote and implement green tech	34.21%
No single-use plastic in council buildings or events	26.84%
Encourage people to grow their own	21.05%
None of the above	8.42%

Q2: Do you feel there are any priorities missing from this theme?

Responses: 178

Responses can be grouped into the following areas:

Waste and Recycling matters	10%
Sustainable housing	9%
Rivers and waterways	8%
Maintaining the character of region	4%
Green energy opportunities	4%
Infrastructure needs	4%
Weeds and litter issues	4%
Education on environmental matters	3%
Sizewell C comments	3%
Questioning whether this is a district council responsibility	2%

As a result of feedback and with additional internal consultation, some of the priorities consulted on have been amended to reflect feedback, such as:

“No single-use plastic in Council buildings or events” has been widened out to include the importance raised by many regarding wider waste and recycling matters, to **“Focus on reduction, re-use and recycling of materials”**.

An additional priority has been added to this theme **“Preserve and maintain the district’s beauty and heritage”** which reflects much of the feedback about maintaining the character of the region.

Sustainable Housing Theme

Q3: What would you consider our most important priorities in our Sustainable Housing theme?

(Respondents could select as many options as they wish, percentages reflect the number of respondents selecting that priority)

Utilise and improve existing housing stock	61.39%
Deliver housing based on our communities' need	53.61%
Reduce and prevent homelessness	44.17%
Listen to our residents to help deliver the best housing	38.89%
Commit to sustainable development practices	38.61%
Tackle fuel poverty new heating technologies	32.50%
Promote housing developments which enhance wellbeing	31.11%
None of the above	3.33%

Q4: Do you feel there are any priorities missing from this theme?

Responses: 127

Responses can be grouped into the following areas:

Affordable housing needs	9%
The right infrastructure	7%
Brownfield/greenfield development	6%
Change of use of redundant buildings into housing	6%
More social housing	6%
Address second homes	5%
More housing in general	4%

Much of this feedback is already taken into account within the expanded commentary of the priorities of this theme, however the following amendments have been made:

“Deliver housing based on our communities’ need”.

“Listen to our residents to help deliver the best housing”.

These two priorities have been amalgamated into a single priority, **“Deliver the right housing based on our communities need”** which includes addressing affordable homes and social renting needs.

Another priority has been slightly amended to read, **“Add to, improve and make better use of our existing housing stock”** which includes changing the use of buildings to provide suitable housing options.

Another priority has been slightly amended to read, **“Promote housing developments which enhance wellbeing and protect the environment”** which encompasses comments around infrastructure needs and brownfield/greenfield development.

Tackling Inequalities Theme

Q5: What would you consider our most important priorities in our Tackling Inequalities theme?

(Respondents could select as many options as they wish, percentages reflect the number of respondents selecting that priority)

Reduce health inequality and improve wellbeing	54.99%
Prioritise early help to support residents	40.17%
Use local data to design and deliver services	38.46%
Efficiently deliver benefits and grants to residents	36.18%
Work with partners to better understand need	35.90%
Further develop Community Partnership model	19.66%
Digitally enable our communities to help residents in need	15.10%
None of the above	10.26%

Q6: Do you feel there are any priorities missing from this theme?

Responses: 102

Responses can be grouped into the following areas:

Clarification or definition needed	10%
Questioning whether this is a district council responsibility	7%
Don't exclude people by using digital means	5%
Education	6%
Getting the right infrastructure in place	6%
Identifying the root cause of issues	4%
Transport needs	3%
Encouraging self help	3%

The feedback from this theme will be used to help provide additional clarification within the commentary of the priorities to ensure meaning is clear. Feedback will also help to inform future comms and awareness of the role a District Council takes in place-shaping for the general prosperity of the district and all residents within it.

Thriving Economy Theme

Q7: What would you consider our most important priorities in our Thriving Economy theme?

(Respondents could select as many options as they wish, percentages reflect the number of respondents selecting that priority)

Increase the economic viability of our towns	55.26%
Ensure Local Plans work for local people	44.15%
Encourage enterprise and support start ups	43.57%
Ensure our residents can benefit from national infrastructure projects	41.52%
Help businesses be more sustainable	36.26%
Celebrate and promote local creativity and enterprise	33.92%
Support businesses to eliminate waste and recycle more	33.04%
Empower residents to build the right career skills	32.16%
Community wealth building by working with local companies	29.53%
None of the above	4.68%

Q8: Do you feel there are any priorities missing from this theme?

Responses: 81

Responses can be grouped into the following areas:

Affordable rates/spaces for businesses	11%
Clarification or definition needed	4%
Keep large employers in the district	4%
Focus on local/community needs	7%
Parking in town centres	7%
Tourism/visitor economy	4%
Public transport	4%
Seeing action/outcomes in town centres	4%

Much of the feedback is addressed as part of the commentary of the priorities within the theme.

As a result of feedback and with additional internal consultation, two additional priorities have been added, “**Encourage Investment in East Suffolk’s key sectors**” and “**Support Responsible Tourism & Visitor Economy**”.



FULL COUNCIL
Wednesday, 22 November 2023

Subject	REVIEW OF THE COUNCIL'S STATEMENT OF LICENSING POLICY
Report by	Councillor Jan Candy, Cabinet Member with responsibility for Community Health
Supporting Officer	Martin Clarke Licensing Manager and Housing Lead Lawyer 07442 412422 Martin.clarke@east Suffolk.gov.uk
Head of Service	Christopher Bing Head of Legal and Democratic Services 07442 405007 Chris.bing@east Suffolk.gov.uk
Strategic Director	Kate Blakemore Strategic Director 01502 523210 Kate.blakemore@east Suffolk.gov.uk

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

To report to Full Council the outcome of the recent consultation on the draft revised Statement of Licensing Policy and to seek adoption of the Policy so that it can be published in January 2024.

Options:

1. To adopt the revised 6th edition of the Statement of Licensing Policy.
2. To not adopt the revised 6th edition of the Statement of Licensing Policy.

Recommendation/s:

That Full Council:

1. Adopts the revised Licensing Act 2003 Statement of Licensing Policy for publication and implementation on 31 January 2024.
2. Delegates to the Head of Legal and Democratic Services the authority to make any minor changes required to the Statement of Licensing Policy as a result of legislative updates, typographical errors or to address formatting issues.

Corporate Impact Assessment

Governance:

Licensing is a Council function exercised by Licensing Committee and Licensing Sub-Committees. The Council is required by section 5(1) of the Licensing Act 2003 to publish a statement of Licensing Policy every 5 years.

ESC policies and strategies that directly apply to the proposal:

Statement of Licensing Policy

Strategic Plan

Environmental:

The Council uses the Statement of Licensing Policy to promote the licensing objectives, which include public safety and prevention of public nuisance, by promoting these objectives the policy is helping to improve the living environment for the residents of East Suffolk.

Equalities and Diversity:

When formulating and approving this policy, the Council must have regard to the Equality Act 2010.

Financial:

The proposed Statement of Licensing Policy does not have a direct financial impact upon the Council.

Human Resources:

Compliance with the proposed statement of Licensing Policy requires monitoring by the Council's licensing team which will have Human Resource requirements.

ICT:

No impact

Legal:

The Council is required by section 5(1) of the Licensing Act 2003 to publish a statement of Licensing Policy every 5 years

Before determining its policy for a 5 year period, the Council must consult:

- (a) the chief officer of police for the Council's area,
- (b) the fire and rescue authority for that area,
- (c) Local Health Board for an area any part of which is in the Council's area,
- (d) each local authority in England whose public health functions within the meaning of the National Health Service Act 2006 are exercisable in respect of an area any part of which is in the licensing authority's area,
- (e) such persons as the Council considers to be representative of holders of premises licences issued by that authority,
- (f) such persons as the Council considers to be representative of holders of club premises certificates issued by that authority,
- (g) such persons as the Council considers to be representative of holders of personal licences issued by that authority, and
- (h) such other persons as the Council considers to be representative of businesses and residents in its area.

During each 5 year period, a licensing authority must keep its policy in respect of that period under review and make such revisions to it, at such times, as it considers appropriate.

Risk:

If the Council does not produce a Statement of Licensing Policy then it will be in breach of its legal obligations under Section 5 of the Licensing Act 2003. This could lead to claims against the Council caused by its failure to publish a Licensing Policy which could result in the Council being required to pay substantial costs.

External Consultees:

The draft revised Statement of Licensing Policy, approved at the meeting of Licensing Committee on 17 July 2023, was sent out for consultation between 25 July 2023 and 28 August

	<p>2023.</p> <p>The external consultees were:</p> <p>Responsible Authorities (as required by the Licensing Act 2003)</p> <p>Town and Parish Councils</p> <p>Premises Licence holders</p> <p>Personal Licence holders</p> <p>Club Premises Certificate holders</p> <p>Members of the public via the Council's website</p>
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>

XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected?			
<p>1.1 Licensing plays an important role in the themes in the Council’s Strategic Plan of growing our economy and enabling our communities. The Statement of Licensing Policy gives clear guidance on licensing matters to applicants, licensees and the public; promoting economic growth for local businesses whilst enabling the community to make constructive representations should the need arise.</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	The Licensing Act 2003 requires each local authority to publish a Statement of Licensing Policy and review it every five years, or sooner if required. This Statement must establish the principles to be applied when determining applications under the Act, such as applications for the sale/supply of alcohol, regulated entertainment and the provision of late night refreshment.
1.2	The Act specifies that in drafting and implementing the Policy, it must promote the four licensing objectives. These are: <ul style="list-style-type: none"> ● The prevention of crime and disorder. ● Public safety. ● The prevention of public nuisance. ● The protection of children from harm.
1.3	Home Office Guidance issued under section 182 of the Licensing Act 2003 (the “Guidance”) provides local authorities with direction on the discharge of their functions under the Act. Licensing Authorities must have regard to the Act and the Guidance when preparing its Policy.
1.4	The Council first published its Statement of Licensing Policy in January 2005. This sets out the decision-making principles when licensing premises for alcohol, regulated entertainment and late night refreshment. Until 2011 the prescribed period for reviewing the policy was every 3 years. In 2011 this period changed to every 5 years. The next policy due to be published in January 2024, will be the Council’s 6 th edition.

1.5	<p>The only substantive difference between the 5th and 6th edition of the Licensing Policy is the addition of paragraph 24, which provides additional protection to the public in relation to ancillary delivery of alcohol/late night refreshment.</p> <p>Paragraph 24 requires that all deliveries only occur during the operating hours of the licensed premises and makes it clear that the licence holder is responsible for ensuring that age verification safeguards are in place and adhered to and also for ensuring that no public nuisance occurs during the delivery.</p> <p>The requirements of Paragraph 24 are reproduced in full below:</p> <p>“24 Ancillary Delivery of Alcohol and/or Late Night Refreshment 24.1 Applications for premises that intend to sell alcohol and/or late-night refreshment for delivery to customers at a residential or workplace address, which is ancillary to the main use of the premises, will generally be granted subject to not being contrary to other policies within this Statement of Licensing Policy and that it meets the criteria below:</p> <ul style="list-style-type: none"> • The hours when delivery will take place is within the relevant operating hours for that premises use • The delivery of alcohol and/or late-night refreshment to customers at their residential address or workplace will be ancillary to the main premises use <p>That the applicant will:</p> <ul style="list-style-type: none"> • implement their own age verification procedures for the sale and supply of alcohol for their delivery staff and ensure that they receive regular training in the company’s age verification procedures, or • ensure that any third party, to which they have contracted the delivery of alcohol and/or food has sufficient age verification procedures in place for the sale of alcohol and has regular training for its delivery personnel on their age verification procedures. <p>That the applicant will:</p> <ul style="list-style-type: none"> • implement their own procedures and provide mitigation to reduce the risk that their delivery service and delivery personnel will create public nuisance either at the premises where the delivery originates and at the delivery destination, or • ensure that any third party, to which they have contracted their delivery service to have sufficient procedures and mitigation in place to ensure that their delivery personnel do not create public nuisance either at the premises where the delivery originates and at the delivery destination. <p>Applications that do not meet the above criteria will be considered on their own merits, subject to other relevant information within this statement.”</p>
1.6	<p>On 17 July 2023, the Licensing Committee resolved to carry out a consultation regarding the proposed draft 6th edition of the Statement of Licensing Policy.</p>
1.7	<p>The consultation ran between 25 July and 28 August 2023. Responsible Authorities, Town and Parish Council’s, Personal, Premises, and Club Certificate</p>

	<p>licence holders and members of the public via the Council’s website, were consulted. Three consultation responses were received.</p> <p>A response was received from Public Health which proposed some additional wording to be included in the Policy namely:</p> <p>Page 5. Paragraph 1.5 to be ‘reduce alcohol misuse by individuals and reduce public harms from excessive alcohol consumption which can lead to short and long term injury or harm’</p> <p>Page 9, paragraph 5.1. additional bullet point ‘an increase in opportunities for excessive alcohol consumption by individuals leading to an increased risk of ill health or harm in themselves or to others’</p> <p>A response was received from the Council’s Environmental Health department which pointed out an error with the information included in a particular sentence in section 18.4 of the policy which stated that the relevant Responsible Authorities could only object on the basis of the ‘Crime and Disorder’ licensing objective, when in fact they could object on the basis of any licensing objective .</p> <p>A response received from Felixstowe Town Council suggested that ‘it would be helpful to view a document that showed how it has been amended from its predecessor’.</p>
1.8	<p>The feedback received from Environmental Health has been addressed.</p> <p>The revised wording is:</p> <p>“18.4 Where the Suffolk Constabulary or Environmental Health have issued an objection notice, to a standard TEN, the Licensing Authority will normally consider this at a hearing (unless the objection notice is withdrawn before the hearing date). Hearings will be held in accordance with the procedure outlined in section 9 above. The system of permitted temporary activities gives the police and Environmental Health Authorities the opportunity to consider whether they should object to a TEN on the basis of any of the licensing objectives.</p> <p>The additional wording suggested by Public Health was included.</p> <p>In relation to the response from Felixstowe Town Council the Council will endeavour to produce a tracked change version of any future or revised Statement of Licensing Policy for consultation purposes. The final approved publish Statement of Licensing Policy will not include tracked changes.</p>
1.9	<p>On 16 October 2023, the Licensing Committee approved the inclusion of the additional wording from Public Health. Revised Statement of Licensing Policy Appendix A</p>

2 Current position	
2.1	East Suffolk carried out its last consultation and review in 2018. The current Statement of Licensing Policy was published in January 2019 and covers the period January 2019 to January 2024.
2.2	The current Statement of Licensing Policy is due for a review and the new document must be published in January 2024.

3 How to address current situation	
3.1	To ensure East Suffolk Council meets the requirements of the Licensing Act 2003, it must publish its revised Statement of Licensing Policy in January 2024.
3.2	Full Council is asked to adopt the revised Statement of Licensing Policy for publication and implementation on 31 January 2024.

4 Reason/s for recommendation	
4.1	The Licensing Act 2003 required all Local Authorities to adopt a Statement of Licensing Policy and to update this policy periodically following a consultation procedure.
4.2	The current Statement of Licensing Policy is due for a review and the new document must be published in January 2024.

Appendices

Appendices:	
Appendix A	Revised Statement of Licensing Policy

Background reference papers:		
Date	Type	Available From
17 July 2023	Licensing Committee agenda and papers	CMIS > Meetings
16 October 2023	Licensing Committee agenda and papers	CMIS > Meetings



Licensing Act 2003

Statement of Licensing Policy

DRAFT

January 2024
(6th Edition)

EAST SUFFOLK COUNCIL
LICENSING ACT 2003: STATEMENT OF LICENSING POLICY

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EAST SUFFOLK COUNCIL

Sixth version Licensing Act 2003 Statement of Licensing Policy

Introduction:

The Licensing Act 2003 became fully implemented on 24 November 2005, and brought about the single biggest change to the licensing arrangements for many types of leisure premises in 40 years. The Act integrated six separate licensing regimes covering the sale and supply of alcohol, the provision of regulated entertainment, the provision of late night hot food or drink (between the hours of 11pm and 5am), night cafés, theatres and cinemas.

This document is the sixth version of the local 'Statement of Licensing Policy' for East Suffolk Council and revisions will endeavour to incorporate the Authority's practical experience of the legislation to date, the revised Guidance document published under section 182 of the Licensing Act 2003 by the Home Office, and feedback from all relevant stakeholders.

The Licensing Authority recognises that it is not always straightforward to reach decisions that satisfy all parties, but the Authority shall always endeavour to carefully balance the interests of owners, premises licence holders, employees, customers and neighbours of licensable premises, and will remain focused on the promotion of the four licensing objectives, which are:

1. The prevention of crime and disorder
2. Public safety
3. The prevention of public nuisance
4. The protection of children from harm

East Suffolk



East Suffolk covers an area of 125,979 hectares and is located on the east coast (to the north and east of Ipswich, the county town of Suffolk), covering the entire Suffolk coastline. It is the most easterly district in Britain and one of the largest in population.

A large part of the district is rural in character and bisected by a series of small river valleys which broaden into estuaries as they near the coast. The district's quality of life is amongst the highest in the country and its environment is a key factor with a large part of the district designated as an Area of Outstanding Natural Beauty, along with numerous areas of natural conservation importance including Minsmere and historical importance such as Sutton Hoo, the castles at Orford and Framlingham and our rich and varied coastline and the historic towns of Beccles, Bungay, Halesworth and Southwold.

While tourism and agriculture are important industries in the district, it is also home to many internationally significant names with Britain's busiest Port at Felixstowe, BT's research and innovation centre at Martlesham, and Britten's performing arts centre at Snape Maltings. Recent investment in the area has seen the 'energy coast' developed with both expanding off-shore wind power at Lowestoft and nuclear power at Sizewell.

THE ROLE OF THE LICENSING AUTHORITY IN THE DECISION MAKING PROCESS:

It is important for any person reading this Statement of Licensing Policy to note that the Licensing Authority's discretion and decision making role, referred to throughout this Statement of Licensing Policy, is only engaged following a relevant representation being lodged in respect of an application, and where that representation is not withdrawn. The application will then ordinarily be heard by a sub-committee of the Council's Licensing Committee. However, it must be noted that, in contrast, the process and determination in respect of minor variations and community premises mandatory conditions dis-applications are exceptions to these usual arrangements, as referred to later in this document.

The Licensing Act 2003 provides for a mediation process between parties. Where it is appropriate for the Licensing Authority to do so, following a relevant representation being made, the Authority shall make all reasonable efforts to facilitate mediation. In doing so the Licensing Authority will be mindful of the legislative framework and any relevant government guidance.

In cases where a premises licence application or club premises certificate has been lawfully made, and no responsible authority or person other than a responsible authority (other persons) has made a representation, the Licensing Authority must grant the application on the terms sought, subject only to conditions which are consistent with the operating schedule and relevant mandatory conditions in the Act. This should be undertaken as an administrative process by the Licensing Authority's officers who will translate the proposals contained within the operating schedule to promote the licensing objectives into clear and understandable conditions. As above, there are different arrangements in place for some minor processes under the Act.

The Police Reform and Social Responsibility Act 2011 created a further role for the Licensing Authority as a Responsible Authority thereby allowing it to make representations and/or seek a review of a premises licence or club premises certificate.

It is the intention of the Licensing Authority to work closely with licensees, their representatives, responsible authorities, other persons, and partner authorities in order to promote the licensing objectives and minimise the burden on all involved to ensure that as far as possible the licensing arrangements work satisfactorily and successfully.

STATEMENT OF LICENSING POLICY (6th edition)

This policy is effective from 31 January 2024 for five years (unless revised by voluntary arrangement).

1. Licensing Objectives

- 1.1 This policy must be read in conjunction with the Licensing Act 2003 (the Act), secondary legislation and the Guidance issued under s.182 of the Licensing Act 2003 (the Guidance).
- 1.2 Where revisions are made to the legislation or Guidance issued by the Secretary of State, there may be a period of time when the local Statement of Licensing Policy is inconsistent with these revisions. In these circumstances, the Licensing Authority will have regards, and give appropriate weight to, the relevant changes, Guidance and its own Statement of Licensing Policy.
- 1.3 The Licensing Authority recognises that balancing the interests of owners, employees, customers and neighbours of licensable premises will not always be straightforward, but it will always be guided by the four licensing objectives of the Act, which are :
- a) the prevention of crime and disorder;
 - b) the prevention of public nuisance;
 - c) public safety; and
 - d) the protection of children from harm

The Licensing Authority's general approach to addressing these four licensing objectives is set out in section 14 of this Statement of Licensing Policy.

- 1.4 In exercising its licensing functions, once its discretion is engaged, the Licensing Authority will primarily focus on the direct impact of the licensable activities taking place at the licensed premises on members of the public living, working or engaged in normal activity who may be affected by the activities.
- 1.5 The aims of this Statement of Licensing Policy include:
- a) Helping to encourage and support a strong and inclusive society that balances the rights of individuals and their communities; and
 - b) Integrating the Licensing Authority's aims and objectives with other initiatives and strategies that will help to:
 - reduce crime and disorder, and the fear of crime;
 - ensure the safety of the public engaging in licensable activities
 - encourage tourism and cultural diversity;
 - reduce alcohol misuse by individuals and reduce harms from excessive alcohol consumption which can lead to short and long term injury or harm
 - encourage the self sufficiency of local communities; and
 - reduce the burden of unnecessary regulation on business.
- 1.6 This Statement of Licensing Policy does not seek to undermine the right of any individual to apply under the terms of the Act for a variety of permissions and to have such an application considered on its individual merits, where the Licensing Authority's discretion has been engaged.

It does not seek to override the right of any person to make representations on or about an application or seek a review of a licence or certificate where provision has been made for them to do so in the Act.

- 1.7 The licensing process can only seek to control those measures within the control of the licensee or certificate holder (and their staff/agents), and in the vicinity of the premises involved in licensable activities, for example on the pavement, in a beer garden or smoking shelter. Licensing law is not a mechanism for the general control of anti-social behaviour by individuals once they are away from such premises and beyond the direct control of the licence holder, nor is it the cure-all for community problems.

2. **Purpose of the Statement of Licensing Policy**

2.1 The purpose of this Statement of Licensing Policy is to:

- inform the elected Members serving on the Licensing Committee of the parameters within which licensing decisions can be made;
- inform applicants, residents and businesses of the parameters within which the Licensing Authority will make licensing decisions;
- inform residents and businesses about how the Licensing Authority will make licensing decisions; and
- provide a basis for decisions made by the Licensing Authority if these decisions are challenged in a court of law.

2.2 This policy relates to the following licensable activities as defined by the Act:

- Retail sale of alcohol;
- Supply of alcohol by or on behalf of a club, or to the order of a member of the club;
- Provision of regulated entertainment, which generally includes music, film, plays, indoor sporting events, boxing or wrestling, dance and similar activities. It should be noted that some entertainment activities may be subject to full or limited exemption in particular circumstances; and
- Provision of late night refreshment.

2.3 It should be noted that some previous licensable activities, and locations, are now deregulated (whether fully or partially) via amendments made to the 2003 Act. Further information on these is available from www.gov.uk. Whether activities/locations may be entitled to benefit from an exemption or de-regulation would be assessed on a case-by-case basis.

2.4 In some cases additional licences for entertainment may be required under separate legislation, for example sexual entertainment venues may also require a licence under schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982, or the venue may also require Performing Rights Society (PRS) or other permissions.

3. **Other legislation, strategies and guidance**

3.1 When carrying out its functions the Local Authority has duties, responsibilities and considerations under other legislation and strategies, for example:

- (a) Crime and Disorder Act 1998 (in particular obligations under section 17 relating to the prevention of crime and disorder);

- (b) The European Convention on Human Rights, given effect by the Human Rights Act 1998;
- (c) Anti-Social Behaviour, Crime and Policing Act 2014 (in particular the powers available under section 80 relating to the closure of premises on the grounds of crime, disorder and nuisance);
- (d) Race Relations Act 1976 (as amended by the Race Relations (Amendment) Act 2000);
- (e) Environmental Protection Act 1990 (as amended); (including the duty of the Local Authority to investigate complaints of statutory nuisance).
- (f) Health & Safety at Work Act etc. Act 1974;
- (g) Noise Act 1996 (as amended);
- (h) Health Act 2006;
- (i) Clean Neighbourhoods and Environment Act 2005 (including powers for the Local Authority to issued fixed penalty notices to licensed premises emitting noise that exceeds the permitted level between 11pm and 7am);
- (j) Policing and Crime Act 2009;
- (k) The Council's procedure for dealing with petitions and its obligations under the Local Democracy, Economic Development and Construction Act 2009;
- (l) The Equality Act 2010;
- (m) European Union Services Directive;
- (n) Police Reform and Social Responsibility Act 2011;
- (o) The Live Music Act 2012;
- (p) The Policing and Crime Act 2017
- (q) The Immigration Act 2016

3.2 The Premises operators/responsible persons within a business or activity are normally responsible for compliance with any other separate statutory requirements which may apply, not dealt with directly by the Local Authority, for example compliance with the Regulatory Reform (Fire Safety) Order 2005.

3.3 The Licensing Authority will as far as possible seek to avoid duplication with other regulatory regimes when dealing with the licensing function. If other existing law already places certain statutory responsibilities on an employer or operator of premises, it cannot be appropriate or proportionate to impose the same or similar duties on the premises licence holder or club. Once the discretion of the Licensing Authority is engaged, it is only where additional and supplementary measures are appropriate to promote the licensing objectives that necessary and proportionate conditions will be attached to a licence.

3.4 Other Local Authority and Government policies, strategies, responsibilities, and guidance documents may also refer to the licensing function, and the Licensing Authority may liaise with the relevant authorities or its directorates with regard to these. Whilst some of these may not be directly related to the promotion of the four licensing objectives, they can indirectly impact upon them.

3.5 For example, the Licensing Authority will liaise closely with the local Safer Neighbourhood Teams (SNT) and/or Crime and Disorder Reduction Partnership (CDRP), the Police and Crime Commissioner and the East Suffolk Safety Advisory Group (SAG) to ensure that the Local Authority can develop effective strategies that take full account of local crime and disorder issues.

3.6 The Local Authority may, in appropriate circumstances, consider seeking from the Licensing Authority premises licences in its own name for its own public spaces within the community. This

may assist with the promotion of broader cultural activities and entertainments which add value to our communities and local economy.

4. **Relationship with Planning Process**

- 4.1 Applications for premises licences for permanent commercial premises will normally be from businesses with planning consent for the property concerned. However, applications for licences may be made before any relevant planning permission has been sought or granted by the Local Planning Authority.
- 4.2 It is strongly recommended that prospective licence applicants contact the Local Planning Authority in advance of making a licence application in order to check, or seek advice on, any planning consents or any conditions relevant to the use of the premises. It clearly makes operational sense to ensure that planning and licensing are compatible.
- 4.3 The Licensing Authority wishes to emphasise that the granting by the Licensing Committee of any variation of a licence which involves a material alteration or change of use to a building would not relieve the applicant of the need to apply for planning permission or building control where appropriate.
- 4.4 The Local Authority will aim to properly separate planning, building control and licensing regimes in order to avoid duplication and inefficiency. The Licensing and Planning regimes involve consideration of different (albeit related) matters. For instance, licensing considers public nuisance whereas planning considers amenity. However, liaison will be undertaken between functions to provide a joined-up approach for service users, wherever possible.
- 4.5 The Licensing Authority will avoid treating licensing applications as a re-run of planning applications, and will not normally impose licensing conditions where the same or similar conditions have been imposed on a planning consent.
- 4.6 The Licensing Authority is not bound by decisions made by the Planning Committee and vice versa.
- 4.7 Where as a condition of planning permission restricted hours have been set for the use of premises for commercial purposes that is different to the licensing hours, the licensee must observe the more restricted hours in order to avoid any breach of their planning permission or licensing obligations - for which they may be liable to prosecution under planning or licensing law.
- 4.8 It clearly makes operational sense to ensure that planning and licensing are compatible. In the majority of cases, it will be wise to obtain or vary any necessary planning consent before making a licensing application. This is because the wider range of considerations open to the planning authority means that if the planning and licensing decisions have to differ, it is likely that the planning decision will be more restrictive. However, there is no legal requirement for a planning application to precede a licence application, and compatibility with the requirements of planning is not in itself a valid reason to adopt a restrictive approach to a licence application.
- 4.9 It may sometimes be appropriate for the licensing authority to have regard to a planning decision concerning the same premises, particularly if it has been made recently and the factors taken into account by the planning authority overlap significantly with the licensing objectives. However, *the licensing authority is not bound by decisions made by the planning authority and vice versa.*

5. Cumulative Impact

5.1 The Licensing Authority recognises that the cumulative effect of licensed premises may have negative consequences which could include:

- an increase in crime against both property and persons;
- an increase in noise causing disturbance to residents;
- traffic congestion and/or parking difficulties;
- an increase in littering and fouling; and
- an increase in opportunities for excessive alcohol consumption by individuals leading to an increased risk of ill health or harm in themselves or to others.

and that enforcement action taken to ensure that conditions are complied with may not always resolve any problems experienced in the vicinity of licensed premises.

5.2 Licensing is only one means of addressing the problems identified above and cannot in isolation provide a solution to many of the problems that may be experienced. Other mechanisms to address problems could include:

- Planning controls
- Powers of Local Authorities or Police to designate parts of the Local Authority area as places where alcohol may not be consumed publicly and confiscation of alcohol in these areas
- Police powers to close down premises or temporary events for up to 48 hours on the grounds of disorder, the likelihood of disorder or excessive noise;
- Prosecution of personal licence holders who sell alcohol to people who are drunk or underage
- Local Authority powers under the Anti-Social Behaviour Crime and Policing Act 2014
- Powers available to responsible authorities under the provisions of the Policing and Crime Act 2009 or Violent Crime Reduction Act 2006.
- Local Authority powers under the Environmental Protection Act 1990 to serve noise abatement notices.

5.3 Where the Licensing Authority is satisfied that there is evidence of a disproportionate detrimental effect on neighbouring businesses and residents and the operation of a number of premises in a defined area has the effect of undermining the licensing objectives, a special policy may be developed. Such a policy would ordinarily address the impact of a concentration of licensed premises selling alcohol for consumption on the premises, as it would not normally be justifiable to adopt such a policy on the basis of a concentration of shops, stores and supermarkets selling alcohol for consumption off the premises.

5.4 When setting such a policy, the Licensing Authority shall have due regard to the Guidance, and will follow the consultation, adoption and review procedures applicable to the process.

5.5 No special policy adopted for a specific area will be absolute, each application shall be considered individually on its own merits.

5.6 The absence of a special policy does not prevent any responsible authority or other persons making representations on a new application for the grant or variation of a licence on the grounds that the premises will give rise to a detrimental cumulative impact on one or more of the licensing objectives in a particular area.

6. **Licensing Hours**

- 6.1 The Licensing Authority, through the exercise of its licensing functions once its discretion is engaged, shall not seek to restrict the trading hours of any particular premises unless it is considered appropriate to promote one or more of the licensing objectives. Each application will be considered individually on its own merits.
- 6.2 An Early Morning Restriction Order (EMRO) is a power introduced by the Police Reform and Social Responsibility Act 2011 that allows licensing authorities to restrict sales of alcohol in the whole or a part of their area for any specified period between 3am and 6am if they consider this appropriate for the promotion of the licensing objectives. This applies to premises licences and club premises certificates.
- 6.3 The licensing authority would need to be satisfied that an EMRO is appropriate for the promotion of the licensing objectives in a particular area.
- 6.4 In the absence of any specific reasons linked to the licensing objectives, the Licensing Authority will not seek to restrict licensed retail outlets ability to sell alcohol for consumption off the premises throughout their general trading hours.
- 6.5 The Licensing Authority recognises that providing consumers with greater choice and flexibility is an important consideration and that in some circumstances flexible licensing hours for the sale of alcohol can help to ensure that the concentrations of customers leaving premises simultaneously are avoided, which in turn can reduce the friction at late night fast food outlets, taxi ranks and other sources of transport which can lead to crime, disorder and disturbance.
- 6.6 The Licensing Authority also acknowledges that licensing hours should not inhibit the development of thriving and safe evening and night-time local economies which are important for investment and employment locally and attractive to domestic and international tourists.
- 6.7 The Licensing Authority will however, where its discretion is engaged, always carefully balance the considerations in 6.5 and 6.6 above against its duty to promote the licensing objectives and protect the rights of local residents and businesses in the vicinity of licensed premises.
- 6.8 The Licensing Authority will consider each application individually on its merits, once its discretion is engaged, and notes the Government's guidance that there is no general presumption in favour of lengthening licensing hours and that the four licensing objectives should be paramount considerations at all times. Where there are relevant representations against an application and the Licensing Committee believes that granting the licensing hours proposed would undermine the licensing objectives then it may reject the application or grant it with appropriate conditions and/or different hours from those requested.
- 6.9 Irrespective of the hours of operation granted for a premises under any licence under the Act, the premises operators should ensure that they comply with any limitation on hours imposed under any other relevant legislation in force - for example Planning law, Sunday Trading Act 1994 or Christmas Day (Trading) Act 2004.

7. **Relevant Representations**

- 7.1 A relevant representation is one that is made in writing and:

- is about the likely effect of the licence on the promotion of the licensing objectives;
- has been made by a responsible authority, elected member of the Licensing Authority or other persons, within the relevant time period as prescribed by regulation;
- has not been withdrawn; and
- has not been determined by the Licensing Authority as frivolous or vexatious (or repetitious in respect of a review).

7.2 In 'borderline' cases, the Licensing Authority will normally give the benefit of the doubt to the responsible authority or other persons making the representation, and any subsequent hearing would provide an opportunity for the person or body making the representation to amplify and clarify it.

7.3 Electronic representations will be administered in accordance with the requirements of the Licensing Act 2003 (Premises licenses and club premises certificates) (Amendment) (Electronic Applications etc) Regulations 2009 and are accepted by the licensing authority provided that the representation is received within the prescribed time limits. An electronic representation is not deemed to be received until it is opened which will be within office hours and if the e-mail is sent outside those hours and the consultation period finishes before the office is next open then the representation is late and will be refused.

7.4 The Licensing Authority will determine whether:

- the representation has been made in the prescribed form; and
- any ordinary and reasonable person would consider the issue(s) raised in a representation as frivolous or vexatious (or repetitious in respect of a review).

Any persons aggrieved by a rejection of his representation on these grounds may challenge the Licensing Authority's decision by way of judicial review.

7.5 Local Councillors play an important role in their communities. They can make representations in writing and subsequently at a hearing as:

- a member of the relevant licensing authority, i.e. elected councillors of the licensing authority for the area in which a premises is situated;
- on behalf of a named other person such as a resident or local business if specifically requested to do so; and
- as an individual in their own right.

Their involvement in and/or participation in meetings to discuss matters is subject to The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 and the Suffolk Code of Conduct.

7.6 The Licensing Authority seeks to consider each representation on its merits, and taking into consideration the following matters; location of the premises which is the subject of the application, the nature of the surrounding area, and the direct impact of the activities proposed to take place.

7.7 The Licensing Act 2003 provides discretion for the Licensing Authority to facilitate a mediation process between parties. The Licensing Authority will attempt mediation between the relevant parties wherever it may be practicable or appropriate to do so, so as to avoid unnecessary

hearings. It may also extend the normal time limits for hearings where it is considered to be in the public interest to do so (for example where all parties are on the point of reaching agreement or so as to ensure that it is possible for a party to attend the hearing). Mediation potential will be assessed case-by-case as each set of circumstances will be different. Where compromise may be viable to appropriately balance the interests of all stakeholders, and doing so will not prejudice any party's rights under the law, then the Licensing Authority will take all reasonable steps to facilitate such discussions.

7.8 It should be noted that the usual hearing arrangements, following receipt of a relevant representation, do not apply to minor variations. For these processes the power to determine the application has been delegated to the Licensing Officer, and no hearing mechanism is involved. Relevant representations and statutory guidance will, however, be considered as part of this process, and applications shall be assessed individually and on merit by the relevant officer.

8. Administration, Exercise and Delegations of Functions

8.1 The Council's published delegation scheme of functions under the Licensing Act 2003 is contained within the Council's Constitution and is available on the Council's website.

8.2 Where an application has been lawfully made under the Act, and no relevant representations are outstanding, the Licensing Authority will grant the application, in accordance with the requirements of the Act under the authority delegated to an officer. The exceptions to this usual administrative process are applications for review of a premises which must be referred to a hearing when the application is made, minor variations and community premises mandatory conditions disapplication requests, as referred to elsewhere in this document.

8.3 Where an application does not meet the statutory requirements, it will be returned to the applicant with an explanation of the matters that need to be addressed in order to meet the statutory requirements.

8.4 Electronic applications will be administered in accordance with the requirements of the Licensing Act 2003 (Premises licences and club premises certificates) (Amendment) (Electronic Applications etc) Regulations 2009.

9. Hearings

9.1 Where a hearing is required, the relevant representations made will be put before the Licensing Sub-Committee. The representations, including the name and address of the person making them, will normally become part of a public document. If any person is deterred from making a representation due to these requirements, for example if they have a genuine and well-founded fear of intimidation or violence, then they should promptly contact the Licensing Team for advice.

9.2 The hearing will be conducted in accordance with the Licensing Act 2003 (Hearings) Regulations 2005

9.3 Where an application is determined at a hearing, the Licensing Sub-Committee will give appropriate weight to the:

- relevant representations made
- submissions and any evidence presented by all parties

- Guidance issued under section 182 of the Act (as may be amended from time to time)
- Licensing Authority's Statement of Licensing Policy
- Steps necessary to promote the licensing objectives
- The Human Rights Act 1998.

10. Conditions

10.1 The 2003 Act (under sections 19-21) makes provision for certain mandatory conditions which are summarised below:

- (a) Where a premises licence authorises the sale or supply of alcohol, no supply may be made at any time when there is:
 - No designated premises supervisor in respect of the licence; or
 - At a time when the designated premises supervisor does not hold a personal licence or it is suspended.
- (b) Where a premises licence authorises the exhibition of films, the licence must include a condition requiring that the admission of children is restricted in accordance with the recommendation of the film classification body, or where varied, the film classification awarded by the Licensing Authority. (Note: The Licensing Authority may either award a classification to an unclassified film or vary the classification of a film upon application in accordance with its policy).

The Licensing Authority recognise the British Board of Film Classification (BBFC), or any successor person or persons designated as the authority under section 4 of the Video Recordings Act 1984, as the relevant film classification body for these purposes.

- (c) Where a licence includes a condition requiring that one or more individuals are present at the premises to carry out security activities, the licence must include a condition requiring such individuals to be licensed by the Security Industry Authority. This requirement will not normally apply to employees who benefit from any relevant exemption under the Private Security Industry Authority Act 2001 (the 2001 Act) or by virtue of any other legislation (for example the Violent Crime Reduction Act 2006).

(Note: A premises licence need not impose such a requirement in relation to those licensed premises which the 2001 Act treats as 'unlicensed premises' – being premises staging plays or exhibiting films, licensed gaming premises such as casinos and bingo halls, and premises where a club certificate is in force and when activities are being carried on under the authority of that certificate).

10.2 There are also mandatory conditions relating to a code of conduct for holders of ON licensed premises, via the Licensing Act 2003 (Mandatory Licensing Conditions) Order 2010 - arising from the Policing and Crime Act 2009. The Secretary of State has powers to set further mandatory conditions and may use this power from time to time. The following conditions apply to ALL premises licensed for ON sales:

1. *The responsible person shall take all reasonable steps to ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises. In this [condition], an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises in a manner which*

carries a significant risk of leading or contributing to crime and disorder, prejudice to public safety, public nuisance, or harm to children –

- (1) games or other activities which require or encourage, or are designed to require or encourage, individuals to –*
 - drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or*
 - drink as much alcohol as possible (whether within a time limit or otherwise);*
 - (2) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic (other than any promotion or discount available to an individual in respect of alcohol for consumption at a table meal, as defined in section 159 of the Act);*
 - (3) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less;*
 - (4) provision of free or discounted alcohol in relation to the viewing on the premises of a sporting event, where that provision is dependent on –*
 - the outcome of a race, competition or other event or process, or*
 - the likelihood of anything occurring or not occurring;*
 - (5) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner.*
- 2. The responsible person shall ensure that no alcohol is dispensed directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of a disability).*
 - 3. The responsible person shall ensure that free tap water is provided on request to customers where it is reasonably available.*
 - 4. (1) The premises licence holder or club premises certificate holder shall ensure that an age verification policy applies to the premises in relation to the sale or supply of alcohol.*
 - (2) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and a holographic mark.*
 - 5. The responsible person shall ensure that –*
 - (1) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures –*
 - (i) beer or cider: ½ pint;*

- (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
- (iii) still wine in a glass: 125 ml; and

(2) customers are made aware of the availability of these measures.

6. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

6.1 For the purposes of the condition set out in paragraph 1

(a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

(b) “permitted price” is the price found by applying the formula — $P = D + (D \times V)$

where—

- (i) *P* is the permitted price,
- (ii) *D* is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
- (iii) *V* is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence

- (i) the holder of the premises licence,
- (ii) the designated premises supervisor (if any) in respect of such a licence, or
- (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994.

6.2 Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

6.3 (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

(2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

10.3 The Licensing Authority may not attach to a licence authorising the performance of plays any condition which restricts the nature or manner of performing those plays (other than on the grounds of public safety).

- 10.4 With the exception of the above mandatory conditions, once its discretion is engaged the Licensing Authority will only attach necessary and proportionate conditions to a premises licence or club premises certificate or, in certain circumstances, a Temporary Event Notice where these:
- are consistent with the issues addressed in the operating schedule which the applicant submits as part of their application; and
 - are appropriate for the promotion of the licensing objectives.
- 10.5 In so far as conditions proposed by any applicant is concerned the Guidance states that it is not acceptable for the licensing authorities to simply replicate the wording from the operating schedule. The authority will endeavour to interpret any condition in accordance with the applicant's intention and to express any such conditions in unequivocal and unambiguous terms.
- 10.6 The Licensing Authority will avoid attaching standard conditions to premises licences or club premises certificates
- 10.7 In so far as conditions proposed by any applicant is concerned, the guidance states that it is not acceptable for the licensing authorities to simply replicate the wording from the operating schedule. The authority will endeavour to interpret any condition in accordance with the applicant's intention.
- 10.8 The Licensing Authority will avoid, as far as possible, attaching conditions to licences/certificates that duplicate the same or similar duties that are already placed on an employer or operator of a premises under other existing laws. However, where these general duties do not adequately address specific issues additional and supplementary measures may be necessary to promote the licensing objectives.
- 10.9 A committee or board of individuals with responsibility for the management of community premises ("the management committee") may apply to have an alternative licence condition included in a premises licence in place of the normal mandatory conditions. The alternative condition is that every supply of alcohol under the licence be made or authorised by the management committee.
- 10.10 Existing conditions relating to live music will not have effect in relation to the category of live music which is unregulated under the provisions of the Live Music Act 2012; unless on a review of the premises licence the authority adds a condition relating to live music as if it were regulated.

11. Appeals

- 11.1 Entitlement to appeal against any decision of the Licensing Authority is set out in Schedule 5 of the Act.
- 11.2 There is no provision for appeals to Magistrates' court in respect of applications for minor variations or disapplication for requirement for Designated Premises Supervisors.

12. Enforcement

- 12.1 Where necessary, enforcement action will be considered in accordance with the Compliance

Code and the Council's General Enforcement Policy. These guidelines are available direct from East Suffolk Council and may be subject to periodic amendment.

- 12.2 The emphasis will be upon a risk-assessed and targeted approach to inspections, concentrating on those premises which either:
- present a greater risk;
 - have a history of non-compliance with conditions/regulation; or
 - demonstrate poor management practice which undermines the licensing objectives.
- 12.3 In consultation with other Responsible Authorities, a decision will be made to use the most appropriate enforcement authority depending on the circumstances.
- 12.4 The Licensing Authority will not normally undertake inspections routinely but may do so when and if they are considered by the Authority as reasonably necessary. The 2003 Act does not require inspections to take place save at the discretion of those charged with an enforcement role.
- 12.5 The Council has adopted a joint enforcement protocol with the other Responsible Authorities, as named in the Act and will in all cases seek a collaborative and partnership approach to the promotion of the licensing objectives.

Compliance support for licensed businesses includes:

- carrying out activities in a way that supports those they regulate to comply and grow;
 - providing simple and straightforward ways to engage with those they regulate and hear their views;
 - basing regulatory activities on risk;
 - sharing information about compliance and risk;
 - ensuring clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply; and
 - ensuring the approach to regulatory activities are transparent.
- 12.6 The Licensing Authority will normally act as the enforcing authority in respect of offences under the Act, and for breaches of licence conditions, unless the circumstances of the particular case are such that it is appropriate for another responsible authority to act, in accordance with the agreed enforcement concordat, instead.
- 12.7 Suffolk Constabulary will retain responsibility as the enforcing authority in respect of the following offences under the Act:
- Section 97 Powers to enter and search
 - Section 143 Failure to leave licensed premises
 - Section 144 Keeping of smuggled goods
 - Section 155 Confiscation of alcohol;
 - Section 157 Power to prohibit sale of alcohol on a train; and
 - Part 8 offences with respect to closure of premises.

- 12.8 Suffolk County Council Trading Standards will retain responsibility as the enforcing authority in

respect of the following offences under the Act, and may work in partnership where appropriate with Suffolk Constabulary in relation to the investigation and enforcement of underage sales:

- Section 146 Sale of alcohol to children
- Section 147 Allowing the sale of alcohol to children
- Section 147A Persistently selling alcohol to underage persons
- Section 154 Weights and measures offences
(which enable Trading Standards Officers to conduct test purchases and authorise other persons to do so).

12.9 Where expedient for the promotion or protection of the interests of the inhabitants of their area, the Council may also take action under Section 222 of the Local Government Act 1972, and other relevant provisions including Section 40 of the Anti-Social Behaviour, Crime and Policing Act 2014. The Council will also have due regard to section 17 of the Crime and Disorder Act 1998 whilst carrying out its functions.

13 Closure Orders and Notices

13.1 Part 8 of the Licensing Act 2003 provides for the arrangements relating to closure orders, and there are also powers available to the Local Authority and/or responsible authorities/court to close premises via other legislation on grounds of serious crime or disorder, persistent nuisance or protection of children - for example under the Violent Crime Reduction Act 2006, Criminal Justice and Immigration Act 2008 and Anti-Social Behaviour and Policing Act 2014.

13.2 Where a Magistrates' Court has determined to exercise its powers in respect of a closure order, the Licensing Authority must conduct a review of the relevant premises licence in accordance with procedures prescribed by regulation. This will normally involve:

- serving notice on the premises licence holder and responsible authorities and advertising the review in accordance with the regulations;
- holding a hearing in accordance with the procedures outlined in section 9 of this Statement of Licensing Policy to review the premises licence; and
- determining the review no later than 28 days after the day on which it receives the notice of the closure order from the Magistrates' Court.

13.3 When determining a review following the notice of a closure order, the Licensing Authority will consider:

- the closure order and any extension to it
- any order under section 165(2) and
- any relevant representations; and will

take such steps as it considers appropriate to promote the licensing objectives as outlined in section 22.4 of this Statement of Licensing Policy.

13.4 The Licensing Authority will notify the licence holder, the Chief Officer of Police and any person who made relevant representations of the outcome of the review hearing, including reasons for the decision. The Licensing Authority may suspend the operation of its decision until the end of the period given to appeal, or until the appeal is disposed of (if not already suspended by the Magistrates' Court).

14.1 Addressing the Licensing Objectives

- 14.1.1 In respect of addressing each of the four licensing objectives in their Operating Schedule, applicants should carefully consider what steps they believe are necessary to promote the licensing objectives, relevant to the individual style and characteristics of their premises and activities. Reference could be made as to whether additional measures will be taken on an occasional or specific basis such as when a special event or promotion is planned, which is intended to, or likely to attract larger audiences.
- 14.1.2 Whilst applicants are not required to seek the views of responsible authorities before formally submitting applications, the Licensing Authority strongly encourage applicants to do so when drafting their operating schedule as applicants may find this a source of useful advice when addressing the licensing objectives. This may in some instances reduce the possibility of responsible authorities, or other persons, raising representations against an application.
- 14.1.3 Applicants should be aware that any measures included in their operating schedule will be converted into conditions consistent with these measures attached to the licence. For this reason the applicant should, where possible, identify measures that specifically set out the action to be undertaken and who is responsible for that action. The Licensing Authority encourages applicants to state their proposed steps to promote the licensing objectives in unequivocal and unambiguous terms.
- 14.1.4 Organisers of large, temporary outdoor events (such as music festivals, fairs, shows and carnivals) are strongly encouraged to engage as early as possible with the responsible authorities to ensure that their planned event is developed in a way likely to promote the licensing objectives. They should also seek the advice of the district Safety Advisory Group.

14.2 Prevention of Crime and Disorder

- 14.2.1 The Council is committed to further improving the quality of life in its area by continuing to help reduce crime and disorder and the fear of crime. To this end, the Licensing Authority strongly encourages applicants and licensees to ensure that relevant factors within their control which impact on crime and disorder have been considered, for example:
- underage drinking
 - drunkenness on the premises
 - drunkenness in public
 - drugs
 - violent behaviour
 - anti-social behaviour
 - firearms and weapons
- 14.2.2 Section 17 of the Crime and Disorder Act 1998 imposes a duty on each Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.
- 14.2.3 In order to promote the prevention of crime and disorder objective, the Licensing Authority encourages licence holders to become active partners with both the Licensing and Responsible Authorities. Applicants are encouraged to demonstrate in their operating schedule that relevant, suitable and sufficient measures within their control have been considered and

identified and will be implemented and maintained in order to reduce or prevent crime and disorder on, and in the vicinity of, their premises.

14.2.4 When addressing the issue of crime and disorder in their operating schedule, applicants may consider, but are not limited to, factors identified at paragraph 14.2.1 above.

14.2.5 Applicants may find it helpful to contact the local Police Licensing Officer or Safer Neighbourhood Team; in their role as a responsible authority, the police are an essential source of advice and information on the impact and potential impact of licensable activities, particularly on the crime and disorder objective and may be able to offer expert advice and guidance on local crime and disorder issues and promotion of this licensing objective.

14.2.6 The following examples of control measures are given purely to assist applicants with development their Operating Schedule, having regard to their particular type of premises and/or activities. These are not in any way to be regarded as standard conditions or mandatory requirements:

- (a) effective and responsible management of premises
- (b) prevention of overcrowding/congregation flashpoints
- (c) training and supervision of staff
- (d) adoption of best practice guidance and other industry codes of practice
- (e) use of accredited 'proof of age' schemes (for example Challenge 25) where it is intended to operate more stringent measures than those contained within mandatory conditions (see section 10 of this document)
- (f) signing up to, and participating in, a Pubwatch or Nightsafe scheme where it is in operation
- (g) provision and use of effective CCTV in and around premises (subject to relevant data protection codes of practice)
- (h) use of Security Industry Authority licensed door staff (during specified days/times)
- (i) provision of toughened, plastic, polycarbonate or Polyethylene Terephthalate (PET) glasses or the decanting of glass bottles into toughened, PET or plastic polycarbonate drinking glasses
- (j) provision of secure deposit boxes for confiscated items ('amnesty bins')
- (k) provision of litter bins and other security measures, such as lighting, outside premises
- (l) control or prevention of customers entering and leaving with opened bottles/glasses – for example whilst they are observing smoke-free regulations
- (m) demarcation, capacity control, supervision and monitoring of areas immediately in the vicinity of the premises, used by smokers
- (n) implementation of a searching policy
- (o) implementation of a dispersal policy
- (p) risk assessment process to consider the crime and disorder implications of individual DJ's and promoters.
- (q) effective and robust controls for third party hirings – for example hiring agreements and hirer vetting, premises supervision, signing-in books.

14.2.7 Within the operating schedule for premises from which alcohol will be sold, a premises supervisor must be designated (Designated Premises Supervisor or 'DPS'), unless a relevant community premises disapplication has been applied for/authorised. The DPS will often have been given the day-to-day responsibility for running the premises by the premises licence holder and, as such, will usually be the first point of contact for authorised officers. In exceptional circumstances, the police may object to the designation of a new DPS where they believe that such an appointment would undermine the crime prevention objective.

- 14.2.8 Where the police object to an individual being appointed as a Designated Premises Supervisor, or object to an application made by community premises management committee for the inclusion of the alternative licence condition, the Licensing Authority will arrange for a hearing at which the issue can be considered in accordance with the procedure outlined in section 9 of this Statement of Licensing Policy.
- 14.2.9 The Licensing Sub-Committee considering the matter will confine their consideration to the prevention of crime and disorder objective.
- 14.2.10 Certain temporary events (see section 18 of this Statement of Licensing Policy) must be notified to the Licensing Authority using the Temporary Event Notice procedure. Depending on the nature and location of such temporary events these may, on occasion, have crime and disorder implications. Organisers of such events are encouraged to submit their notification as soon as reasonably practicable in advance of the event in line with existing statutory requirements, to enable the Police, the Environmental Health Team and the Local Authority to work with them to identify and reduce the risk of crime and disorder.

14.3 Public Safety

- 14.3.1 The Council is committed to ensuring that the physical safety of any person visiting or working in licensed premises is not compromised. To this end, the Licensing Authority encourages applicants and licensees to conduct a risk assessment prior to completion of their operating schedule to ensure that relevant factors within their control which impact on public safety have been considered and identified. These factors may include, but are not limited to:
- (a) the occupancy capacity of the premises (including staff and performers). Note: If a capacity has been imposed/set through other legislation, for example under Fire Safety legislation, it may not be appropriate to reproduce it in a premises licence. Anticipated maximum capacity/attendance for large, temporary outdoor events should be made clear.
 - (b) the age, design and layout of the premises, including means of escape in the event of fire or other emergency
 - (c) the nature of the licensable activities to be provided and whether those activities are of a temporary, occasional or permanent nature
 - (d) the hours of operation (differentiating the hours of opening from the hours when licensable activities are provided, if different)
 - (e) customer profile (such as age, disability or culture)
 - (f) the use of special effects such as lasers, pyrotechnics, smoke machines, foam machines, etc.
 - (g) demarcation, capacity control, supervision and monitoring of areas immediately in the vicinity of the premises, used by smokers.
- 14.3.2 The Licensing Authority shall not seek to impose fire safety conditions where the Regulatory Reform (Fire Safety) Order 2005 adequately controls such matters.
- 14.3.3 The following examples of possible control measures are given purely to assist applicants when preparing their operating schedules, having regard to their particular type of premises and/or activities. These are not in any way to be regarded as standard conditions or mandatory requirements:
- (a) suitable and sufficient risk-assessments. Some applicants may wish to consider a

commitment in their operating schedule to providing the relevant authorities with a full risk assessment prior to the commencement of licensable activities (this may be particular relevant to large temporary outdoor events).

- (b) effective and responsible management of premises
- (c) provision of a sufficient number of people employed or engaged to secure the safety of the premises and patrons/staff
- (d) appropriate instruction, training and supervision of those employed or engaged to secure the safety of the premises and patrons
- (e) adoption of best practice guidance and other voluntary codes of practice (Note: Applicants may wish to contact the local Health & Safety officers or HSE for advice)
- (f) provision and use of effective CCTV in and around premises
- (g) provision of toughened, plastic, polycarbonate or polyethylene terephthalate (PET) glasses or the decanting of glass bottles into toughened, PET or plastic polycarbonate drinking glasses
- (h) implementation of crowd management measures
- (i) monitoring arrangements such as door staff, ticketing, attendance clickers or maintenance of attendance records
- (j) regular/periodic review and testing (and certification where appropriate) of procedures, appliances, systems etc. pertinent to safety.

14.4 Prevention of Public Nuisance

- 14.4.1 Licensed premises can have significant potential to impact adversely on persons in the vicinity through public nuisances that arise from their operation.
- 14.4.2 Subject to case law, the Licensing Authority interprets 'public nuisance' in its widest sense, and takes it to include such issues as noise, light, odour, litter and anti-social behaviour, where these matters impact on those living, working or otherwise engaged in normal activity in the vicinity of a licensed premises.
- 14.4.3 The Licensing Authority encourages applicants and licensees to conduct a risk assessment prior to completion of their operating schedule to ensure that relevant factors within their control which impact on public nuisance have been considered and identified.
- 14.4.4 The Licensing Authority recommends that licensees apply a high standard of control to minimise the potential for any public nuisance that may arise from their operation of the premises, particularly where:
 - they are situated in a residential or noise sensitive area; or
 - extended opening hours are proposed.
 - events include amplified outdoor music or speech.
- 14.4.5 When addressing the issue of prevention of public nuisance in their operating schedule, the applicant may identify steps to show that those factors that impact on the prevention of public nuisance objective have been considered. These may include, but are not limited to:
 - the location of premises and proximity to residential and other noise sensitive premises, such as hospitals, care homes, hospices and places of worship
 - the hours of operation, particularly between 23.00hrs and 07.00hrs
 - the nature of activities to be provided, including whether those activities are of a temporary or permanent nature and whether they are to be held inside or outside
 - the design and layout of premises and in particular the presence of noise limiting features
 - the occupancy capacity of the premises

- the availability of public transport/taxi and private hire services to assist the speedy dispersal of patrons after an event;
- the hours during which licensable activities take place and closure of the premises
- last admission time

14.4.6 The following examples of control measures are given purely to assist applicants when preparing their operating schedules, having regard to their particular type of premises and/or activities. These are not exhaustive, and are not to be regarded in any way as standard conditions or mandatory requirements, but include:

- (a) effective and responsible management of premises
- (b) appropriate instruction, training and supervision of those employed or engaged to prevent incidents of public nuisance
- (c) control of operating hours for all or parts (such as garden, patio and terraced areas) of premises, including such matters as deliveries or the collection or disposal of glassware.
- (d) impact on neighbours due to customers opening doors/going outside to observe smokefree regulations
- (e) adoption of best practice guidance (such as the Good Practice Guide on the Control of Noise from Pubs and Clubs, produced by the Institute of Acoustics, Safer Clubbing, the National Alcohol Harm Reduction Strategy Toolkit and other industry codes of practice). The local Environmental Protection officer may be able to offer advice to assist in compliance with the Licensing Act objectives
- (f) installation and effective maintenance of soundproofing, air conditioning, acoustic lobbies and sound limitation devices
- (g) management of people, including staff, and traffic (and resulting queues) arriving and leaving premises
- (h) liaison with public transport/taxi and private hire service providers
- (i) siting of external lighting, including security lighting. The local Environmental Protection Officer may assist in ensuring any external lighting minimises the potential for light pollution nuisance
- (j) management arrangements for collection and disposal of litter
- (k) effective ventilation systems to prevent nuisance from odour
- (l) demarcation, capacity control, supervision and monitoring of areas immediately in the vicinity of the premises, used by smokers.
- (j) implementation of a dispersal policy

14.4.7 Please note that applicants should consider contacting the local Planning Authority for advice on whether any proposed installation of lighting, ventilation, soundproofing, smoking shelter or other works require planning consent from the Planning Authority. This may be particularly relevant if the premises is a listed building.

14.5 Protection of Children from Harm

The Licensing Authority, once its discretion is engaged concerning an application, shall not seek to limit the access of children to any premises unless it is necessary for the prevention of their physical, moral or psychological harm. Consideration shall be given to the individual merits of each application.

The Act places responsibilities upon licence holders, while recognising that parents and others accompanying children also have responsibilities. Licensees should be aware that children will normally see licensees and their staff as responsible adults – and that children are particularly

vulnerable to adults who are 'responsible' and 'in authority' if those adults use their position to develop inappropriate relationships or otherwise abuse children's trust

- 14.5.1 Whilst the Licensing Authority cannot anticipate every possible issue of concern that could arise in respect of children in relation to individual premises, areas that will give rise to particular concern in respect of children would include premises:
- Where entertainment or services of an adult or sexual nature are provided (whether permanently or occasionally);
 - Where there have been convictions of members of the current staff at the premises for selling alcohol to minors or with a reputation for underage drinking;
 - With a known association with drug taking or dealing;
 - Where there is a strong element of gambling on the premises (but not for example the simple presence of a small number of cash prize gaming machines); and
 - Where the supply of alcohol for consumption on the premises is the exclusive or primary purpose of the services provided at the premises.
- 14.5.2 Whilst it is not possible for the Licensing Authority to give an exhaustive list of what amounts to entertainment or services of an adult or sexual nature, examples would generally include topless bar staff, striptease, lap-dancing, table-dancing, pole-dancing, performances involving feigned violence or horrific incidents, feigned or actual sexual acts or fetishism, or entertainment involving strong and offensive language. It should be noted that premises deemed as 'sexual entertainment venues' under the Policing and Crime Act 2009 are also likely to require an additional licence under the Local Government (Miscellaneous Provisions) Act 1982.
- 14.5.3 The 2003 Act made it an offence to permit children under the age of 16 who are not accompanied by an adult to be present on premises being used exclusively or primarily for supply of alcohol for consumption on those premises under the authorisation of a premises licence, club premises certificate or where that activity is carried on under the authority of a Temporary Event Notice (TEN). 'Exclusively or primarily' in relation to the consumption of alcohol will bear their ordinary and natural meaning in the context of the particular circumstances.
- 14.5.4 In addition, it is an offence to permit the presence of children under 16 who are not accompanied by an adult between midnight and 5am at other premises supplying alcohol for consumption on the premises under the authority of a premises licence, club premises certificate or where that activity is carried on under the authority of a Temporary Event Notice (TEN).
- 14.5.5 The Licensing Authority considers that, subject only to the provisions of the 2003 Act and unless restriction of access is necessary to protect children from harm, this is a matter for the discretion of the licensee.
- 14.5.6 The Licensing Authority shall not seek to impose any condition on any licence or certificate requiring the admission of children.
- 14.5.7 Applicants are strongly encouraged to demonstrate in their operating schedule that they have considered and identified any suitable and sufficient measures relevant to the style, character and activities of their individual premises to protect children from harm.

- 14.5.8 Where it is necessary for promotion of the protection of children from harm licensing objective, there are a range of alternatives which may be considered for limiting the access of children. These could include:
- (a) Limitations on the hours during which children may be present;
 - (b) Limitations excluding the presence of children under certain ages when particular activities are taking place;
 - (c) Limitations on the parts of premises to which children might be given access;
 - (d) Age limitations (below 18);
 - (e) Requirements for accompanying adults; and
 - (f) Full exclusion from those under 18 from the premises when any licensable activities are taking place.
- 14.5.9 The following examples of possible control measures are given purely to assist applicants with preparing their operating schedules, having regard to their particular type of premises and activities. These examples are not exhaustive, and are not in any way to be treated as standard conditions or mandatory requirements, but include:
- (a) provision of a sufficient number of people employed or engaged to secure the protection of children from harm
 - (b) appropriate instruction, training, supervision and background checks of those employed or engaged to secure the protection of children from harm
 - (c) adoption of best practice guidance
 - (d) limitations on the hours when children may be present in all or parts of the premises
 - (e) the presence of an adequate number of adult staff to control the access and egress of children and to protect them from harm whilst on the premises
 - (f) an adequate number of adult staff to be responsible for the child performers, checked by the Disclosure and Barring Service.
 - (g) use of accredited 'proof of age' schemes (for example Challenge 25) where it is intended to operate more stringent measures than those contained within mandatory conditions (see 10.2 of this document)
- 14.5.10 Where film exhibitions are authorised at a premises, the licence shall include a mandatory condition (section 20 of the Act) requiring that children are restricted from viewing age-restricted films in accordance with the British Board of Film Classification (BBFC), or in accordance with any recommendation made by the Licensing Authority.
- 14.5.11 The Licensing Authority recognise the British Board of Film Classification (BBFC), or any successor person or persons designated as the authority under section 4 of the Video Recordings Act 1984, as the relevant film classification body for these purposes.
- 14.5.12 Where film exhibitions are given at premises, licensees must ensure that children are restricted from viewing age-restricted films classified according to the British Board of Film Classification, or by the Licensing Authority. (see section 9).
- 14.5.13 The Licensing Authority recognises the Suffolk Safeguarding Partnership, or its designated nominee, as being competent to advise on matters relating to the protection of children from harm. The contact details are available from the Licensing Team or www.eastsuffolk.gov.uk
- 14.5.14 Suffolk County Council Trading Standards and Suffolk Constabulary may, in conjunction with other appropriate agencies, conduct test purchases to check the compliance of retailers with the prohibition on underage sales of alcohol.

15. Personal Licences

- 15.1 The Licensing Authority will grant a personal licence if the applicant has met the requirements set out in the Act and no objections are received from the Suffolk Constabulary. All applicants must provide evidence of their right to work in the UK.
- 15.2 Where an applicant is found to have an unspent conviction for a relevant offence or a foreign offence, and the police object to the application on crime prevention grounds, the application will normally be referred to a Sub-Committee of the Licensing Committee.
- 15.3 The Licensing Authority also has the power to suspend or revoke a personal licence where it becomes aware that the holder has been convicted of a relevant offence, a foreign offence, or required to pay an immigration penalty.
- 15.4 Any hearing will be held in accordance with the procedure referred to in section 9 of this Statement of Licensing Policy.
- 15.5 All personal licence holders should ensure they are aware of the offences relating to personal licences, for example the duty of the holder to advise the Court of the existence of their personal licence if charged with a relevant offence and to advise the Licensing Authority of changes to name or address.
- 15.6 In accordance with the Guidance issued under section 182 of the Licensing Act 2003, the Licensing Authority recommends that personal licence holders (and DPSs/authorised community premises management committees) overtly authorise individuals in writing to sell alcohol under the authority of their personal licence/duty where the personal licence holder or DPS/management committee is unable to authorise the transaction(s) in person.
- 15.7 The Licensing Authority considers that, when establishing whether or not an authorisation has been given for the retail sale of alcohol, the following factors are relevant:
- there should be an overt act of authorisation, (this could, for example, be a specific written statement given to the individual being authorised);
 - the person(s) authorised to sell alcohol at any particular premises should be clearly identified;
 - the authorisation should specify the acts which may be carried out by the person authorised; and
 - there should be in place sensible arrangements for the personal licence holder to monitor the activity authorised on reasonably regular basis.
 - training records should be kept relevant to the training provided to each individual authorised by the personal licence holder

16. Applications for Premises Licences

- 16.1 Guidance on making an application and information, such as contact details for responsible authorities, is available on the Council website at www.eastsuffolk.gov.uk or by contacting the Licensing Team.

- 16.2 Individuals applying for a premises licence for the sale of alcohol or late night refreshment must be entitled to work in the UK and must provide evidence accordingly. This includes applications made by more than one individual applicant. An application made by an individual without the entitlement to work in the UK must be rejected.
- 16.3 Pre-application discussions with responsible authorities are strongly encouraged to assist applicants with development of their operating schedule in a way which is likely to promote the licensing objectives.
- 16.4 The Licensing Act 2003 provides for a mediation process between parties. Where it is appropriate for the Licensing Authority to do so, following a relevant representation being made, the Authority shall make all reasonable efforts to facilitate mediation. In doing so the Licensing Authority will be mindful of the legislative framework and any relevant government guidance. It may also extend the normal time limits for hearings where it is considered in the public interest to do so (for example where all parties are on the point of reaching agreement, or so as to ensure that it is possible for a party to attend the hearing).
- 16.5 An application may be made to the Licensing Authority for any place within its area to be used for licensable activities or recognised club activities. The application requirements are prescribed by regulation and will normally include:
- a) the completed application form;
 - b) the prescribed fee;
 - c) an operating schedule;
 - d) plan of the premises, in accordance with regulatory requirements; and
 - e) if it is intended that the premises be authorised to sell alcohol, a form of consent given by the person the applicant wishes to have specified in the Premises Licence as the Designated Premises Supervisor (DPS), or else request to dis-apply this usual requirement if for an eligible 'community premises'.
 - f) for individual applicants, evidence to right to work in the UK.
- 16.6 The Operating Schedule will include a statement of:
- a) the relevant licensable activities, including a description of the style and character of the business and activities to be conducted on the premises;
 - b) the times during which the applicant proposes that the relevant licensable activities are to take place;
 - c) any other times during which the applicant proposes that the premises are to be open to the public;
 - d) where the applicant wishes the licence to have effect for a limited period, that period;
 - e) where the relevant licensable activities include the sale by retail of alcohol, the name and address of the individual whom the applicant wishes to have specified as the Designated Premises Supervisor and a consent form signed by that person including details of their personal licence (or else a 'community premises' disapplication request may be applicable);
 - f) where the relevant licensable activities include the sale by retail of alcohol, whether such sales are proposed to be for consumption on the premises or off the premises, or both;
 - g) the steps which the applicant proposes to take to promote the licensing objectives; and
 - h) any other prescribed matters.
- 16.7 Where relevant representations are received about an application, and those representations

are not withdrawn, the application will normally be referred to a Sub-Committee of the Licensing Committee, which will be held in accordance with the procedure referred to in section 9 of this Statement of Licensing Policy.

16.8 Where a premises licence application is being applied for to authorise a large scale outdoor event of a temporary nature (for example a music concert, street fair, show or carnival) the Licensing Authority strongly recommends that applicants contact the responsible authorities as soon as possible in advance of making their application in order to seek expert advice and guidance on formulation of their operating schedule to ensure that the event runs safely and with a view to promoting the four licensing objectives.

16.9 In the event that an application relates to the sale or supply of alcohol from premises that are used as a garage, or are part of the premises used as a garage, and where there is doubt over whether Section 176 of the 2003 Act is called into question, it will be the responsibility of the Licensing Authority to determine the intensity of use and whether it is used primarily as a garage. Where there is insufficient evidence to establish primary use, it will be the responsibility of the Licensing Authority to decide whether to grant the licence and deal with any issues through enforcement action or to defer granting the licence until the primary use issue can be resolved.

16.10 Applications and notices can be submitted on any working day as defined in the Act.

16.11 Applicants may be required to provide written confirmation that applications have been advertised as required by regulations.

17. Club Premises Certificates

17.1 Paragraphs 16.1 to 16.3 above apply

17.2. The application requirements for a Club Premises Certificate are set by regulation and will normally include provision of:

- a) the relevant fee;
- b) the Club Operating Schedule;
- c) a plan of the premises in accordance with regulatory requirements;
- d) a copy of the rules of the Club; and
- e) details to verify that the Club is a qualifying Club

17.3 The Club Operating Schedule will contain the following information:

- a) details of the recognised Club activities to which the application relates;
- b) the times during which it is proposed the recognised Club activities take place;
- c) any other times during which it is proposed the premises are open to members and their guests;
- d) the steps which it is proposed to take to promote the licensing objectives; and
- e) any other prescribed matters.

17.4. Where relevant representations are received in respect of an application, and those representations are not withdrawn, the application will normally be referred to a Sub-Committee of the Licensing Committee, and the hearing will be held in accordance with the procedure referred to in section 9 of this Statement of Licensing Policy.

18. Temporary Events Notices (TENS)

18.1 The Act sets out the terms and conditions under which an application for a TEN may be made. A standard TEN must be applied for a minimum of 10 working days prior to the first day of the event, and the Licensing Authority recommend that wherever possible notice-givers submit their TEN a minimum of 28 days prior to the commencement of the event. Should any statutory modifications be made to the TENS system, for example relating to service requirements, then the Licensing Authority shall have due regard to these and publicise any such changes including via its website at www.eastsuffolk.gov.uk

There also is provision for making an application for a late TEN. Such application may be made no earlier than 9 working days before the event and no less than 5 working days before the event. Again, the Licensing Authority understands this to mean 9 or 5 days exclusive of the day on which the event is to start and exclusive of the day on which the notice is given.

18.2 Where either a standard TEN or a late TEN is given and one or more of the relevant statutory limits are exceeded, the Licensing Authority will serve a Counter-Notice on the notice giver in accordance with section 107 of the Licensing Act 2003 to prevent the licensable activities from going ahead. There is no provision under the Act to appeal against the issue of a Counter-Notice.

18.3 Where a TEN complies with the statutory requirements, and neither the Suffolk Constabulary nor Environmental Health have not submitted an objection notice to the Licensing Authority within the prescribed time, the Licensing Authority shall record the notice in its licensing register and send an acknowledgement to the premises user. The event may then proceed in accordance with the submission within the Temporary Event Notice.

18.4 Where the Suffolk Constabulary or Environmental Health have issued an objection notice, to a standard TEN, the Licensing Authority will normally consider this at a hearing (unless the objection notice is withdrawn before the hearing date). The system of permitted temporary activities gives the police and Environmental Health the opportunity to consider whether they should object to a TEN on the basis of any of the licensing objectives.

18.5 If the TEN is submitted, and there is an objection notice, for an event that is a premises that has either a premises licence or club premises certificate for all or part of the premises then the licensing authority can add conditions to the TEN provided such conditions are appropriate for the promotion of the licensing objectives and are consistent with the carrying out of the licensable activities under the TEN.

18.6 Where either the Suffolk Constabulary or Environmental Health issue an objection notice to a late TEN, there is no provision either for the Licensing Authority to consider a hearing or add conditions and therefore the event cannot proceed.

18.7 The Licensing Authority will notify the applicant of its decision at least 24 hours before the beginning of the event period specified in the temporary event notice.

19. Provisional Statements

19.1. The Act sets out the terms and conditions under which an application for a provisional statement may be made.

19.2 Where a Provisional Statement has been issued and a person subsequently applies for a Premises Licence in respect of the premises in accordance with the provisions of the Licensing

Act, representations made by a person to the Licensing Authority will not be taken into account if:

- (a) Given the information in the application for a Provisional Statement, the person objecting could have made the same, or substantially the same, representations about the application but failed to do so without reasonable excuse; and,
- (b) There has been no material change in circumstances relating either to the relevant premises or to the area in the vicinity of those premises.

20. Variations of Licences

- 20.1 Where a premises licence holder wishes to amend the licence the Act allows, in most cases, for an application to be made to vary the licence rather than requiring an application to be made for a new licence. It should be noted that 'substantial variations' may not be applied for using the variation procedures prescribed by section 34 of the Act, instead substantial changes, for example an amendment to the duration of the licence or transfer of the licence from one premises to another, will require a new application under section 17 of the Act.
- 20.2 In the case of a change of name or address of someone named in the licence (section 33) or application to vary the individual specified in the licence as DPS (section 37) there are simplified processes for making such applications.
- 20.3 The Legislative Reform (Supervision of Alcohol Sales in Church and Village Halls etc.) Order 2009 (SI 2009/1724) amends the 2003 Act to allow certain 'community premises' which have, or are applying for, a premises licence that authorises alcohol sales to also apply to include the alternative licence condition in sections 25A(2) and 41D(3) of the 2003 Act in the licence instead of the usual mandatory conditions in sections 19(2) and 19(3) of the 2003 Act.
- 20.4 The Act and Guidance set out the terms, conditions and considerations under which an application for a minor variation, or request from the management of 'community premises' to disapply the usual mandatory conditions, may be made. Minor variation processes may be applied for in some circumstances, subject to some specific exclusions, to reduce the normal service, advertising and consultation requirements (and associated financial impacts in cost and time).
- 20.5 The minor variation process is intended for some small variations to licences/certificates that will not adversely impact on promotion of the licensing objectives (for example small variations to layout or some minor alterations to activities, timing or conditions). In each case the Licensing Authority will consult the relevant Responsible Authorities and make a decision on whether the variation could impact adversely on the licensing objectives. This process also makes a more limited provision for other persons to make comment on the proposals.
- 20.6 In determining these applications, under his/her delegated authority on behalf of the Licensing Authority, the Licensing Officer shall carefully assess each application on a case-by-case basis in the light of government guidance and all relevant factors. The licence/certificate holder may wish to seek advice from responsible authorities, in advance of submitting an application, as to whether the licensing objectives are likely to be affected by the proposals.
- 20.7 If relevant representations are made and not withdrawn the Licensing Authority will normally hold a hearing in accordance with the procedure referred to in section 9 of this Statement of

Licensing Policy, and at that hearing the Licensing Authority may:

- a) Grant the application as applied for, subject only to any conditions consistent with the operating schedule and any relevant mandatory conditions;
- b) Modify the conditions (either by means of omission, inclusion or amendment) of the licence; or
- c) Reject the application in whole or in part.

20.8 The Licensing Authority may determine a licence so that different conditions may apply to:

- a) different parts of the premises concerned; and
- b) different licensable activities,

where to do so would be considered necessary and proportionate for promotion of the licensing objectives.

20.9 Where the police submit an objection to an application to vary a Designated Premises Supervisor (DPS), or from a community premises to disapply the usual mandatory conditions, because they consider that the circumstances are such that granting it would undermine the crime and disorder objective then a hearing will normally be held in accordance with the procedure referred to in section 9 of this Statement of Licensing Policy.

21. Transfer of Premises Licences

21.1. Where an application is lawfully made under the Act for the transfer of a licence and the Police submit an objection to the application, the Licensing Authority will normally hold a hearing in accordance with the procedure referred to in section 9 of this Statement of Licensing Policy. This hearing will be confined to consideration of the crime and disorder objective and the application may be rejected where the Licensing Authority considers it appropriate for the promotion of the crime prevention objective to do so. All individual applicants must provide evidence of their right to work in the UK.

22. Reviews

22.1 The review of a premises licence or club premises certificate is a key protection for local communities where problems associated with one or more of the licensing objectives are occurring and these are linked to the operation of licensed premises.

22.2 Where relevant representations are made about an existing licence the Licensing Authority will normally hold a hearing which will be held in accordance with the procedure referred to in section 9 of this Statement of Licensing Policy to consider them unless:

- a) the representation is considered frivolous, vexatious or to be repetitious (that is, identical or substantially similar to a ground specified in an earlier application for a licence, provisional statement or review); or
- b) All parties to the hearing, including those persons making representations, agree that the hearing is not necessary.

22.3 A review of the premises licence will normally also follow:

- a) any action instigated by the Police to close down the premises for up to 24 hours on grounds of disorder or public nuisance;

- b) summary review powers of the Police pursuant to section 21 (regarding serious crime and disorder) of the Violent Crime Reduction Act 2006 ; or
 - c) any exercise of the closure order powers available to the magistrates' court.
- 22.4 In determining a review application at a hearing, the Licensing Authority may take such steps as it considers appropriate to promote the licensing objectives, which include:
- a) modifying the conditions of the licence (by inclusion, amendment or omission);
 - b) excluding a licensable activity from the scope of a licence;
 - c) removing a designated premises supervisor;
 - d) suspending the licence for a period not exceeding three months; or
 - e) revoking the licence.
- 22.5 Where the Police make application for summary review under section 53A of the Licensing Act 2003 the relevant licensing authority will normally consider whether it is necessary to take interim steps pending the determination of the review applied for. Such consideration may take place without the holder of the premises licence having been given an opportunity to make representations to the relevant licensing authority. The interim steps the relevant licensing authority must consider taking are -
- (a) modification of the conditions of the premises licence;
 - (b) exclusion of the sale of alcohol by retail from the scope of the licence;
 - (c) removal of the designated premises supervisor from the licence; and
 - (d) suspension of the licence.
- Should a summary review be instigated, the Licensing Authority shall follow the procedures as set out in the Licensing Act 2003 (Summary Review of Premises Licences) Regulations 2007.
- 22.6 Applications may also be made for the review of licences which are held by a management committee in respect of community premises, and which include the alternative licence condition instead of the normal mandatory conditions. In relation to such applications, the licensing authority may determine that the normal mandatory conditions should apply instead of the alternative condition if it considers this to be appropriate for the promotion of the licensing objectives. Such a determination may be reached following the usual procedure for review applications set out in sections 51 to 53 of the Act.
- 22.7 The outcome of a review hearing will not ordinarily have effect until such time as the period given for appealing (normally 21 days) expires or an appeal is disposed of.

23 Fees

- 23.1 Section 55A of the Licensing Act 2003 allows Licensing authorities to suspend licences due to non-payment of the annual fee. The licence will be reinstated as soon as the fee is paid and the licensing authority must notify the licence holder of receipt of the fee. If an administrative error has occurred, then the suspension of a licence will be become invalid.
- 23.2 The late night levy (LNL) is another power for licensing authorities. An additional fee may be charged for premises that have a late alcohol licence. Whether or not to implement the levy will be left entirely at the discretion of the licensing authority that will make the decision based on the situation in its local area.

24 Ancillary Delivery of Alcohol and/or Late Night Refreshment

24.1 Applications for premises that intend to sell alcohol and/or late-night refreshment for delivery to customers at a residential or workplace address, which is ancillary to the main use of the premises, will generally be granted subject to not being contrary to other policies within this Statement of Licensing Policy and that it meets the criteria below:

- The hours when delivery will take place is within the relevant operating hours for that premises use
- The delivery of alcohol and/or late-night refreshment to customers at their residential address or workplace will be ancillary to the main premises use

That the applicant will:

- implement their own age verification procedures for the sale and supply of alcohol for their delivery staff and ensure that they receive regular training in the company's age verification procedures, or
- ensure that any third party, to which they have contracted the delivery of alcohol and/or food has sufficient age verification procedures in place for the sale of alcohol and has regular training for its delivery personnel on their age verification procedures.

That the applicant will:

- implement their own procedures and provide mitigation to reduce the risk that their delivery service and delivery personnel will create public nuisance either at the premises where the delivery originates and at the delivery destination, or
- ensure that any third party, to which they have contracted their delivery service to have sufficient procedures and mitigation in place to ensure that their delivery personnel do not create public nuisance either at the premises where the delivery originates and at the delivery destination.

Applications that do not meet the above criteria will be considered on their own merits, subject to other relevant information within this statement.



FULL COUNCIL
Wednesday, 22 November 2023

Subject	Wickham Market Neighbourhood Plan
Cabinet Member	Cllr Kay Yule Cabinet member with responsibility for Planning and Coastal Management
Report Author(s)	Andrea McMillan Planning Manager (Planning Policy, Delivery and Specialist Services Manager) Andrea.McMillan@eastsoffolk.gov.uk 01394 444567 Ian Johns Planner (Policy) ian.johns@eastsoffolk.gov.uk 01502 523065
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Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to	Not applicable.
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disclose the exempt information.	
Wards Affected:	Wickham Market

Purpose and high-level overview

Purpose of Report:

The purpose of this Report is to “make” the Wickham Market Neighbourhood Plan part of the Development Plan for East Suffolk following positive results of the Referendum on 12th October 2023. The Referendum question asked:

“Do you want East Suffolk Council to use the Wickham Market Neighbourhood Plan to help it decide planning applications in the Neighbourhood Area?”

More than 50% of those voting in the Referendum voted “YES” to the question and East Suffolk Council must now “make” the Neighbourhood Plan, unless it considers the Neighbourhood Plan would breach or be incompatible with any EU obligation or any of the Convention Rights.

Once “made” by East Suffolk Council, the Neighbourhood Plan will become part of the Development Plan for East Suffolk and sit alongside the adopted East Suffolk Council Suffolk Coastal Local Plan. The Development Plan is used to determine planning applications.

Options:

None. Neighbourhood Planning (General) Regulations 2012, state that the Council must make the Neighbourhood Plan within eight weeks of the day after the Referendum, unless it considers the Neighbourhood Plan would breach or be incompatible with any EU obligation or any of the Convention Rights. No breaches or incompatibilities have been identified, therefore there are no alternative options available to the Council.

Recommendation/s:

That the Council make the Wickham Market Neighbourhood Plan (Referendum version, August 2023) part of the statutory Development Plan for East Suffolk for the whole of the Wickham Market Neighbourhood Area.

Corporate Impact Assessment

Governance:

Once made, the Neighbourhood Plan will form part of the Development Plan and will be a statutory consideration in determining planning applications in the Neighbourhood Area.

ESC policies and strategies that directly apply to the proposal:

The Neighbourhood Plan is in general conformity with the relevant strategies of the East Suffolk Council - Suffolk Coastal Local Plan. This is something the Neighbourhood Plan has been tested against at Examination.

Environmental:

Individual policies in the Neighbourhood Plan contribute to achieving objectives in relation to the natural environment which will support the delivery of the Environment priorities in the Strategic Plan. For example, the Wickham Market Neighbourhood Plan includes policies which protect wildlife as part of the development process, protects green spaces and protects open, green and treed spaces in Conservation Areas.

Equalities and Diversity:

An Equality Impact Assessment (ref: EQIA556732899) has been carried out for the Wickham Market Neighbourhood Plan. A positive impact was identified with respect to the protected characteristics of age, disability and economic disadvantage. No negative impacts on those with protected characteristics were identified and no mitigating actions were identified/required.

Financial:

In accordance with the Community Infrastructure Levy (CIL) Regulations, Parish/Town Councils with a made Neighbourhood Plan in place will receive 25% of CIL receipts from liable development schemes permitted after the Neighbourhood Plan is made. For towns and parishes with no made Neighbourhood Plan, they will receive 15% of CIL receipts (further details on CIL can be found via the following link:

<https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>). East Suffolk Council is entitled to Neighbourhood Planning Grant of £20,000 from the Government for the Neighbourhood Plan.

Human Resources:

No impacts.

ICT:

No impacts.

Legal:

A legal challenge can be made in relation to:

- a) The Council declining to make a Neighbourhood Plan which has been successful at Referendum within eight weeks. (Unless agreed with the Qualifying Body or if the plan is considered to breach the EU obligations or convention rights). Proceedings must be bought within six weeks of the day the decision is published.
- b) The conduct of the Referendum. Proceedings must be bought by a claim for judicial review filed within six weeks beginning the day on which the results are published.

Risk:

There are no anticipated risks in relation to the implementation of the recommendation.

External Consultees:

The Wickham Market Neighbourhood Plan has been subject to extensive consultation throughout the course of its preparation. This has included consultation with the community as a whole; statutory consultees; and a broad range of other interested

	parties. Details of the consultation processes can be found in the Consultation Statement in the Background Reference Papers.
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input checked="" type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected?			
The Wickham Market Neighbourhood Plan includes the community's vision and sets out how this will be delivered. This supports P09 'Community Pride' by promoting			

involvement, participation and positive action in the community and delivering a collective vision and objectives.

Wickham Market Neighbourhood Plan policy WICK12 (Land at Old School Farm) allocates land for 85 new dwellings. Policy WICK13 (Land at Simon's Cross) allocates land for 25 dwellings. These policies support priority P01 'Build the right environment for East Suffolk', because they promote economic growth and ensure an adequate supply of housing where they are needed by the community.

The Wickham Market Neighbourhood Plan includes a number of policies that together will support priority P03 'Maximise and grow the unique selling points of East Suffolk.' Policy WICK2 (Local Landscape Character) seeks to protect the landscape surrounding the village. Policy WICK3 (Key Local Views) seeks to protect the views of the village and surrounding countryside. Policy WICK 6 (Local Green Spaces) designates and protects several important green spaces throughout the village. Policy WICK7 (Preserving and enhancing open, green and treed spaces in the Wickham Market Conservation Area) protects several spaces that contribute to the character and appearance of the Wickham Market Conservation Area. Policy WICK8 (Non-Designated Heritage Assets) protects buildings that are of local significance.

The Wickham Market Neighbourhood Plan was created by Wickham Market Parish Council and involved an extensive programme of public consultation, both on the contents of the Neighbourhood Plan and on a draft of the plan. It has also been subject to Examination and a Referendum of local residents. At the Referendum, 78.9% of those who voted supported the adoption of the Neighbourhood Plan. Therefore, the Neighbourhood Plan delivers community led planning. The two allocations, WICK12 and WICK13 also deliver housing within the local community. Therefore, the Neighbourhood Plan supports priority 07 'Taking Positive Action on What Matters Most.'

Wickham Market Neighbourhood Plan policy WICK5 (Designing for Renewable Energy and Carbon Reduction) requires new development to be water efficient, to maximise the use of renewable energy and to include electric charging points in accordance with the latest version of the Suffolk Parking Standards. This supports priority P22 'Renewable Energy,' which seeks to promote the increased use of renewable energy throughout the District.

Background and Justification for Recommendation

1 Background facts	
1.1	Neighbourhood Plans were introduced by the Localism Act in 2011. They allow communities to write their own plan containing planning policies which, once 'made', form part of the Development Plan and are used alongside the East Suffolk Local Plans and national planning policy. Consideration of the Development Plan is a statutory element of determining planning applications. Neighbourhood Plans also commonly include non-policy actions which reflect the community's aspirations but are not suitable as planning policies. More information on each plan is included below and full versions can be found in the Appendices.

1.2	<p>Wickham Market Parish Council has taken up the opportunity to produce a Neighbourhood Plan for its community. The Neighbourhood Plan has been developed by the community with the Parish Council being the ‘Qualifying Body’. The Neighbourhood Plan has been through several stages of consultation, including statutory consultations, and an Examination carried out by an Independent Examiner. The Examiner recommended that the Neighbourhood Plan proceed to a Referendum.</p> <p>The Referendum took place on 12th October 2023. The question asked at the Referendum was: Do you East Suffolk Council to use the Neighbourhood Plan for Wickham Market to help it decide planning applications in the Neighbourhood Area?”</p> <p>288 people voted ‘yes’ and 77 people voted ‘no’. The Referendum outcome was therefore positive. The turnout was 20.3%.</p>
1.3	<p>The Neighbourhood Plan will become formally part of the Development Plan for East Suffolk once they are made. East Suffolk Council is required to make the Neighbourhood Plan within 8 weeks of the day following the Referendum, unless it considers that this would breach, or be incompatible with any EU obligation or any of the Convention of Rights. No such breaches or incompatibilities have been identified for the Neighbourhood Plan.</p>
1.4	<p>Areas with a made Neighbourhood Plan benefit from a greater proportion of the ‘Community Infrastructure Levy’ (CIL) where this is payable. The CIL is a tariff paid by liable forms of development and it is calculated using the development’s floor area. CIL is paid to the Council by the developer. A proportion of this money is then paid directly to the Parish or Town Council on a bi-annual basis. Parish or Town Councils receive 25% of CIL receipts where there is a made Neighbourhood Plan in place, or 15% without. The CIL Regulations apply a cap to the annual amount of CIL transferred to Parish or Town Councils where there is no Neighbourhood Plan in place. It is capped at £100 per dwelling (indexed for inflation). There is no cap on the 25% transferred when a made Neighbourhood Plan is in place.</p>
1.5	<p>The Neighbourhood Plan Area, which was designated by East Suffolk Council on 12th January 2016, covers the parish area at the time. However, following a parish boundary review, which took effect in April 2023, the parish boundary was extended to include the ‘Wickham Gate’ development, as defined by Suffolk Coastal Local Plan policy 12.60 (Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)). As a result, Wickham Gate is included in the new parish boundary, but remains outside the Neighbourhood Plan Area. However, on the recommendation of the Examiner and as agreed by East Suffolk Council, the Referendum area covered the full current parish area meaning residents of Wickham Gate could vote in the Referendum.</p>

1.6	<p>The plan addresses a wide range of topics which are important to the local community. Planning policies in the plan relate to:</p> <ul style="list-style-type: none"> • Protection of landscape character • Key local views • Wildlife habitat in new development • Renewable energy • Local Green Spaces • Open spaces and Conservation Areas • Historic Environment • Car parking • Pedestrian safety • Cycling, walking and disabled access • Housing allocations <p>It is worth noting that Suffolk Coastal Local Plan policy SCLP12.1 states that the Wickham Market Neighbourhood Plan should deliver a minimum of 70 dwellings (in addition to those delivered by the Wickham Gate development). Together these two allocations will deliver 110 new dwellings.</p>
1.7	<p>Wickham Market Parish Council engaged with its local community in producing its Neighbourhood Plan. This process is documented in their Consultation Statement (see Background Reference Papers). Following this, the Neighbourhood Plan was submitted to East Suffolk Council. East Suffolk Council then publicised the Neighbourhood Plan and invited comments. This took place over the period of 9th November to 21st December 2022. Following this period of publicity, East Suffolk Council, with the agreement of the Parish Council, appointed an Independent Examiner to examine the Neighbourhood Plan. The role of the Examiner is to ensure the Neighbourhood Plan meets the relevant legislative and procedural requirements. Testing against the 'Basic Conditions' set out in the Town and Country Planning Act 1990 is the main element of this.</p> <p>Andrew Ashcroft BA (Hons) M.A. DMS MRTPI was appointed to examine the Wickham Market Neighbourhood Plan. He issued his Report in June 2023 (see Background Reference Papers) and concluded that subject to modifications the Wickham Market Neighbourhood Plan meets the Basic Conditions and should proceed to Referendum.</p> <p>As part of the Examination the Examiner also held an additional consultation lasting three weeks regarding the correction of an error in the Site Assessment Report, as set out in his report contained with the Background Papers.</p> <p>The Examiner concluded that the Neighbourhood Plan was compatible with European Obligations and the European Convention on Human Rights.</p> <p>As detailed in paragraph 1.5 above, the Examiner also recommended that the Referendum area was extended to include the Wickham Gate development site.</p>
1.8	<p>East Suffolk Council (using powers delegated to the Head of Planning and Coastal Management) considered each of the Examiner's recommended modifications, in</p>

	<p>consultation with the Parish Councils. The Council agreed with all of the Examiner’s recommended modifications (although considered some minor amendments were necessary for a small number of them).</p> <p>These considerations are set out in the Decision Statement for the Neighbourhood Plan (see Background Reference Papers). The Decision Statement for the Wickham Market Neighbourhood Plan was published in August 2023. The Referendum was then held on 12th October 2023 and, as covered above, the Neighbourhood Plan was successful.</p>
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2 Current position	
2.1	The Wickham Market Neighbourhood Plan has successfully passed its Referendum which took place on 12 th October. Legislation states that the Council must make a Neighbourhood Plan within 8 weeks of the day after a successful Referendum, unless it considers that this would breach or be incompatible with any EU obligation or any of the Convention of Rights.

3 How to address current situation	
3.1	The Council should make the Wickham Market Neighbourhood Plan.

4 Reason/s for recommendation	
4.1	Following a successful Referendum, the Council must make a Neighbourhood Plan within 8 weeks of the day following the Referendum unless it considers that this would breach or be incompatible with any EU obligation or any of the Convention of Rights. There are no indications of breaches or compatibility issues therefore the Council must make the Neighbourhood Plan.

Appendices

Appendices:	
Appendix A	Wickham Market Neighbourhood Plan (Referendum Version August 2023)

Background reference papers:		
Date	Type	Available From
October 2022	Wickham Market Neighbourhood Plan Consultation Statement	https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Wickham-Market/Submission/Wickham-Market-NP-Consultation-Statement-October-2022.pdf

June 2023	Wickham Market Neighbourhood Plan Examiner's Report	https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Wickham-Market/Wickham-Market-NP-Examiners-Report.pdf
August 2023	Wickham Market Neighbourhood Plan Decision Statement	https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Wickham-Market/Referendum/2023.08.29-Wickham-Market-Decision-Statement-publication-signed-Erratum.pdf



Wickham Market Neighbourhood Plan 2018 to 2036

Referendum version 1.1

August 2023

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List of Policies

- [WICK1.](#) DEVELOPMENT STRATEGY AND PRINCIPLES
- [WICK2.](#) LOCAL LANDSCAPE CHARACTER
- [WICK3.](#) KEY LOCAL VIEWS
- [WICK4.](#) PROVISION FOR WILDLIFE IN NEW DEVELOPMENT
- [WICK5.](#) DESIGNING FOR RENEWABLE ENERGY AND CARBON REDUCTION
- [WICK6.](#) LOCAL GREEN SPACES
- [WICK7.](#) PRESERVING AND ENHANCING OPEN, GREEN AND TREED SPACES IN THE WICKHAM MARKET CONSERVATION AREA
- [WICK8.](#) NON-DESIGNATED HERITAGE ASSETS
- [WICK9.](#) CAR PARKING
- [WICK10.](#) PEDESTRIAN SAFETY
- [WICK11.](#) CYCLING, WALKING AND DISABILITY ACCESS ROUTES
- [WICK12.](#) LAND AT OLD SCHOOL FARM
- [WICK13.](#) LAND AT SIMON’S CROSS

Erratum 30th August 2023: The first published Referendum Version contained inconsistencies in the bibliography reference numbering which have been corrected in this version.

1. INTRODUCTION

Purpose of the Plan

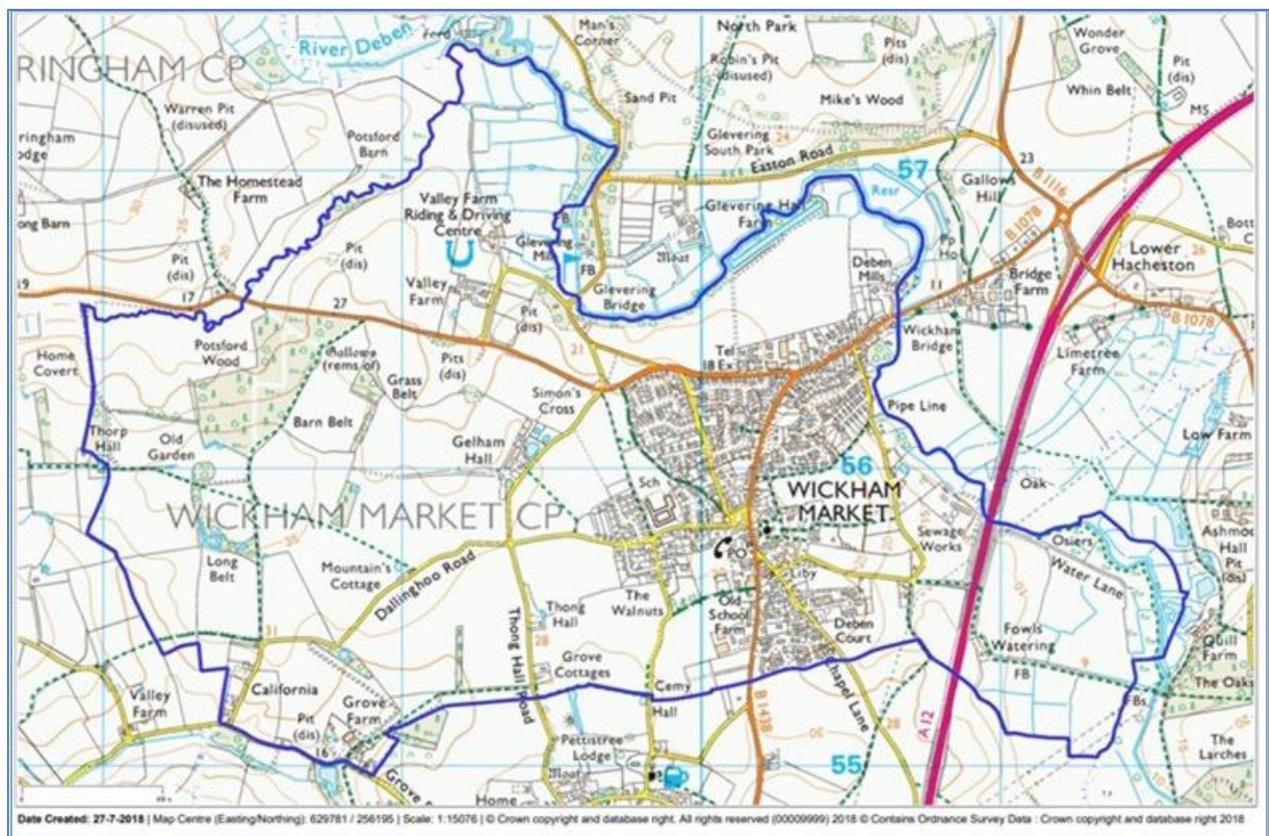
- 1.1. This document represents the Neighbourhood Plan for Wickham Market for the period 2018 to 2036. The Plan contains a vision for the future of Wickham Market and sets out clear planning policies to realise this vision.
- 1.2. The principal purpose of the Neighbourhood Plan is to set out the policy for development within Wickham Market and it will form part of the East Suffolk Council Development Plan. It also provides guidance to anyone wishing to submit a planning application for development within the village. The process of producing a plan has been informed by the Parish Council's commitment to put the views and wishes of the community first and has therefore involved the community as widely as possible. Our approach and the processes followed are documented on our Neighbourhood Plan web site (1). The different topic areas are reflective of matters that are of considerable importance to Wickham Market, its residents (children and adults), businesses and community groups. We are also committed to promoting sustainable development in line with the National Planning Policy Framework (NPPF) (2) which also contains a useful glossary of many of the terms used throughout this document.
- 1.3. Some of the Neighbourhood Plan policies are general and apply throughout the plan area, whilst others are site or area-specific and apply only to the appropriate areas illustrated on the relevant map. Nevertheless, in considering proposals for development, East Suffolk Council will apply all relevant policies of the plan. It is therefore assumed that the Neighbourhood Plan will be read as a whole, although some cross-referencing between the policies has been provided.
- 1.4. The process of producing the Neighbourhood Plan has confirmed the Parish Council's commitment to put its community first. The plan process has identified a number of actions which have not been included in the policies' sections. This is because these are not specifically related to land use matters and therefore sit outside the scope of a Neighbourhood Plan. These actions will be addressed by Wickham Market Parish Council (WMPC) outside of the Neighbourhood Plan process but will be considered alongside the Neighbourhood Plan.

Policy Context

- 1.5. The Core Strategy and Development Management Policies, covering the former Suffolk Coastal district, was adopted in 2013. It then provided the strategic context for the Neighbourhood Plan, particularly in respect of the spatial strategy for the Key Service Centres (subsequently changed to Large Village) which included Wickham Market, housing requirements, employment and the environment. It is supported by the Site Allocations and Area Specific Policies Development Plan Document 2017 (3).
- 1.6. A new Suffolk Coastal Local Plan (4) has now been issued which was adopted on 23rd September 2020 and now forms the basis of policy decisions in the Neighbourhood Plan so as to ensure that it is in general conformity with the relevant strategic policies.
- 1.7. Suffolk Coastal District Council, as the local planning authority at the time, designated the Wickham Market Neighbourhood Area in January 2016 to enable WMPC to prepare the Neighbourhood Plan. The Plan has been prepared by the community through the Wickham Market Neighbourhood Plan (WMNP) Committee, which is a sub-committee of WMPC. WMPC are the Qualifying Body and have overall responsibility for the production of the Neighbourhood Plan.

- 1.8. The WMNP has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Planning Regulations 2012 (as amended). The WMNP Committee has prepared the plan to establish a vision for the future of the village and to set out how that vision will be realised through planning and controlling land use and development change over the plan period.
- 1.9. The map in Figure 1.1 below shows the boundary of the Neighbourhood Plan area (enclosed within the blue line), which is the same as the boundary of Wickham Market parish at the time of the area designation. The area covered by this Neighbourhood Plan is the area covered by the Parish at the time of designation, preparation and Submission. The Parish boundary was expanded from 1 April 2023 following East Suffolk Council’s Community Governance Review to include the land at Wickham Gate allocated under Local Plan Policy SCPL12.60, however the Neighbourhood Plan area remains the same as that designated in 2016 and shown in Figure 1.1.

Figure 1.1: Wickham Market Neighbourhood Plan area boundary



The previous Suffolk Coastal Local Plan Core Strategy (2013) covered the period 2010 – 2027 and proposed no additional housing for Wickham Market. This is because four developments at Wickham Place (65 Houses), Castell Close (11 houses), The Oaks (8 houses) and Gospel Hall Close (8 Houses) were approved between 2010 and 2014. The housing requirement for the Neighbourhood Plan covering the period to 2036 is now set out in Policy SCLP12.1 ‘Neighbourhood Plans’ of the Suffolk Coastal Local Plan (4), as a minimum of 70 dwellings.

1.10. In support of the Neighbourhood Plan, the following evidence is presented:

1. Housing Need Assessment (2016)– AECOM (5)
2. Heritage and Character Assessment (2017)– AECOM (6)
3. Landscape Character Assessment Parts 1, 2 and 3 (2108) – L Wylam (7) (8) (9).
This report was funded by the WMPC.
4. Site Assessment Report (2018) – AECOM (10)
5. Non-Designated Heritage Assets – R Jenkinson (11)
6. Local Green Space Assessment – R Lewis (12)
7. Strategic Environment Assessment Report (2021) (13)
8. Habitats Regulation Assessment Report (2021) (14)
9. Basic Conditions Statement (2021) (15)
10. Consultation Statement (2021) (16)

Timeline

1.11. The dates of the key events throughout the preparation of the Neighbourhood Plan are summarised as follows:

- 25 Jun 2015 – First monthly meeting.
- 13 Jan 2016 – Approval granted by SCDC for Wickham Market Neighbourhood Plan.
- 29 Jan 2016 – Neighbourhood Plan website www.wickhammarketnp.org created.
- 01 May 2016– Funding approved by Locality and for Technical Support Packages.
- 15 May 2016 – First Open Day to gain residents' views. 113 replies were completed.
- 06 Nov 2016 – Second Neighbourhood Plan Open Day attended by 142 residents.
- 14 Apr 2017 – Aims and Objectives agreed.
- 18 Mar 2018 – Neighbourhood Plan Open Day. 104 questionnaires completed.
- 18 Feb 2019 – Issue of Regulation 14 Version of Neighbourhood Plan.
- 22 Feb 2019 - Regulation 14 Neighbourhood Plan Open Day.
- 01 Apr 2019 – Regulation 14 Consultation period ended.
- 01 Apr 2020 - ESC Parking review withdraws Long Stay business parking.
- 28 Apr 2020 - Regulation 14 Comments incorporated in NP
- 09 Mar 2021 - Local Green Space Assessment complete
- 09 Mar 2021 – Non-Designated Heritage Assets document complete
- 19 Mar 2021 – Strategic Environment Assessment complete
- 06 Oct 2021 - Habitats Regulation Assessment received from ESC– Final version
- 20 Oct 2021 - Draft Reg 15 pre-submission version of the NP posted on website.
- 20 Oct 2021 – Draft Consultation Statement prepared
- 21 Oct 2021 – Draft Basic Conditions Statement completed
- 25 Nov 2021 –Draft Reg 15 Version of NP and associated documents sent to ESC for informal review
- 22 Mar 2022 - Basic Conditions Statement completed and posted on website
- 22 Mar 2022 – Strategic Environmental Assessment and the Non-Technical Summary completed and posted on website
- 30 Mar 2022 - Reg 15 pre submission version of NP completed and all associated documents sent to ESC for review
- 28 Oct 2022 – Final version of Consultation Statement completed
- 31 Oct 2022 – Final Reg15 version of NP and associated documents submitted to ESC
- 09 Nov 2022 – Start of Reg 16 consultation
- 11 Jan 2023 – Independent examiner appointed
- 09 May 2023 – Start of additional 3 week consultation requested by the Examiner
- 28 June 2023 – Independent Examiner’s Report published
- 02 Aug 2023 - ESC issues Decision Statement which gives approval for the Plan to go forward to referendum.

A timeline of all key events is also given in the Timeline document (17)

Monitoring and Potential Review of the Plan

- 1.12. WMPC, as the Neighbourhood Plan authority, will be responsible for maintaining and periodically revisiting the Plan if and as required to ensure relevance and to monitor delivery.
- 1.13. As part of the monitoring process the Parish Council will pay particular attention to two matters. The first would be where the development of the allocated sites did not proceed (and therefore the village would not deliver its strategic housing requirement). The second would be if East Suffolk Council was to adopt a new Local Plan. Should either of these circumstances arise, the Parish Council will consider the need or otherwise for a partial or a full review of the Plan.

2. LOCAL CONTEXT

Historical Development of Wickham Market

- 2.1. Wickham Market was recorded in the Domesday Book in 1086 when it was called 'Wikham'. It has been a village of some importance in the past with a town hall in which quarter sessions were held. In 1440 King Henry VI granted a weekly fair which was held on the Market Hill. Wickham Market continued to grow and from the 15th century onwards many fine houses, now mostly listed, were built. Local enterprise flourished and in 1780 Nathaniel Whitmore founded an Iron Works at the north end of the village which later became Whitmore and Binyon in 1867, when the site and business was expanded further. At its height, the Iron Works employed 200 men from the village. Sadly, in 1901 the business ran into financial difficulties and was wound up.
- 2.2. A notable and prominent feature of the village is its church of All Saints which is the oldest surviving building in the village and its unique octagonal tower and lead spire rises 137.5 feet and can be seen from much of the local area around the village. It dates back to the beginning of the 14th century but is likely to be on the site of an older Anglo-Saxon church.
- 2.3. The initial development in Wickham Market comprised a number of farmhouses around the Market Hill. Later development of houses took place either side of the main road and the majority of these buildings are now within the village Conservation Area (18). There are 42 listed buildings within the parish (19), most of them situated at points along the High Street, Dallinghoo Rd, and around the Market Hill. Most of these buildings range in age from 15th to 18th century and reflect the growth in wealth and trade during this period. With its market, it had become an important centre for commerce and trade. It was also located on the main coaching route from London to Lowestoft and Great Yarmouth and its large 15th century Coaching Inn, The White Hart, occupied a commanding position in the village centre. Sadly, it succumbed to the loss in trade when the bypass was built in 1978 and has now been converted into shops and flats. Council and private housing estates built in the 20th Century characterise much of the rest of the village. These are typically semi-detached or detached and there is often a generous space between the building façade and the street. Although many of the council houses are now in private ownership, there remains a high level of social housing (now in Housing Association ownership) in Wickham Market, which is almost double the percentage in what was the former Suffolk Coastal District as a whole.

Wickham Market today

- 2.4. The socio-economic profile of Wickham Market is detailed in (20). In summary, the population of Wickham Market at the last census in 2011 (21) was 2,156. Since then, there has been considerable development and the population is now approximately 2,400. As with the rest of Suffolk, the average age of the population is rising, but this seems to be more marked in Wickham Market. This is not surprising as the cost of housing is well above that which local people can afford and it is viewed as an excellent place to retire. In the 2011 census, 22% of the population of the village was retired. Between 2001 and 2011 the working population shrank. The number of 19 to 29 year olds reduced by 2.5%, whereas it increased in Suffolk Coastal district as a whole, and the percentage of 30 to 44 year olds reduced by 4.2%, more than twice the reduction experienced in Suffolk Coastal district as a whole. The main occupation for those that work is predominantly public administration, health or education. Over 40% of the residents get to work by car with less than 5% working from home; however, since the last census fast broadband has been brought into the village, so it is felt that the number of residents working from home is likely to be increasing. The 2011 census showed that Wickham Market has a high proportion of social rented accommodation (24%) compared with 11% in Suffolk Coastal district and 14% in Suffolk overall.
- 2.5. In the Local Plan, Wickham Market is designated as a Large Village. The village has significantly more than the Local Plan suggests as the minimum requirement for a Large Village but is not large enough to be considered a Market Town. The settlement provides an extensive range of facilities namely:
- Public transport access to local towns (albeit very limited)
 - Shops meeting everyday needs
 - Local employment opportunities
 - Meeting place for example Village Hall
 - Post office
 - Pub or licenced premises (under restoration)
 - Primary school
 - Doctors surgery
 - Dentist
 - Restaurants
 - Church
- 2.6. The village has all of these services although the last pub remaining, The George, burnt down in 2013. Efforts are currently ongoing with a view to restoring this listed building and operating it as a community-run pub.
- 2.7. Wickham Market is a hub for many of the surrounding villages. There has been considerable development in many of these villages such as Ufford, Easton, Campsea Ashe and Rendlesham and this has put a considerable strain on the village services as well as road networks within the village. Rendlesham and Wickham Market are a combined medical centre practice, and their workload continues to increase. The dental practice in Wickham Market is also struggling to cope with the increase in demand.
- 2.8. The Local Plan (4) provides details of the Wickham Market District Centre and the Riverside Industrial Estate. These locations contain the majority of business premises within Wickham Market. A small number of units are also located at the junction of High St and Spring Lane.

It is concluded that the Local Plan (4) adequately meets business needs in Wickham Market and therefore no additional policies are required within this plan.

- 2.9. A business survey conducted in Feb 2017 (22) shows that businesses on the industrial estate were largely well established and were satisfied with their current position. However, several showed concern about the possibility of losing the post office and felt the bus service was inadequate. In the Wickham Market District Centre, it was suggested that more footfall was needed to ensure a healthy retail future. It was felt that more retailers would help, and that a pub was important for the village. Nearly 50% of workers in the village travelled over 5 miles to work in Wickham Market. The vast majority used cars therefore the need for workers car parking was high. Many of the shops requested free parking for visitors. Start-up support was seen as being important and the post office identified the need for small business units.
- 2.10. Two significant developments, Wickham Place (65 homes) and Castell Close (11 homes) took place in the village between 2011 and 2015, as well as other smaller developments. One of the main issues raised by the community in respect of both developments is that they have inadequate parking for a rural village. It is important that future developments are designed to provide sufficient off-road parking. New development has added to traffic congestion in the village. With the historic pinch points along the High Street remaining, this congestion is exacerbated, and the narrow pavements make it unsafe for pedestrians, parents/carers with pushchairs, and mobility scooter users. This can discourage these groups from walking to or accessing the village centre. This is clearly described in the Wickham Market Traffic and Parking Report dated Apr 2014 (23)
- 2.11. A range of new housing types are needed in Wickham Market to address the requirements of first-time buyers, families, and older downsizers. Whilst the village already has a significant number of bungalows - 17% of the current housing stock (5) (24) - demand continues for such provision. The Wickham Market Housing Needs Assessment (5) identified that the affordability ratio of entry level owner occupation for lower quartile income in Suffolk Coastal district was 7.6, the highest in Suffolk. This is borne out by the Wickham Place development where there is evidence that the majority of buyers were retiring from out of the area and many local people could not afford to purchase these houses. The new houses resulted in only one additional child for the village primary school. However, the refurbishment of the 32 Deben Court (former workhouse) flats, has generated some additional school pupils.
- 2.12. The Housing Needs Assessment stated that the maximum number of dwellings required to address local needs in Wickham Market by 2036 was 110 with a minimum figure of 32. Subsequently the Local Plan (4) gives a final figure of 70, which was reduced from 100, as the Local Plan includes Policy SCLP12.60, a development formerly in Pettistree Parish (now in Wickham Market Parish) for 150 dwellings, which is within the Settlement Boundary of Wickham Market, but not within the Neighbourhood Plan area. Planning permission was granted for this development on June 3rd, 2021 (Reference DC/20/3264/FUL).
- 2.13. EDF have proposed that a Park and Ride facility is to be built just to the north of Wickham Market for the construction phase of Sizewell C. It has been estimated that at peak construction, traffic through the north of the village along the B1078 will increase by an extra 1050 vehicles a day (25).

3. VISION AND OBJECTIVES

Wickham Market Neighbourhood Plan Vision

3.1. In consultation with the community (26) (27) (28) (29) (30) and applying the principles of Community Comes First (31), a vision (32) has been established that has informed the objectives of the WMNP. Within the vision there are seven themes which are:

1. Housing for all

By 2036 Wickham Market is likely to have to accommodate a number of new homes. We will find the best location/s and specify the type and style of housing that will meet the needs of our local community. We intend that any new housing will be energy efficient and where possible carbon neutral, have adequate parking and be sited so that any increase in traffic congestion is kept to a minimum.

2. An Inclusive and Caring Society

Wickham Market has a strong sense of community and local spirit. We wish to ensure that any future development will consider the impact on the community, its services and overall well-being. At all times consideration should be given to the local population and in particular to the less able and vulnerable amongst us.

3. A Viable Community

We wish to maintain the character of Wickham Market as a place with a strong sense of community and history. We aim to enhance local employment opportunities, in particular providing support for start-up businesses. We wish to ensure the community can manage its future growth through appropriate infrastructure and services to meet the everyday needs of its population.

4. Maintaining the Green Environment

We intend that the village should remain rural, preserve its open landscape, its views and allotments and ensure that its heritage is protected. Our aim is to ensure that any development has adequate landscaping and green spaces and does not have a negative impact on our lanes, byways, footpaths and encircling green landscape.

5. An Attractive Village Centre

We will work to improve the vitality and viability of the village centre while retaining its unique rural and historic character. We will endeavour to improve the quality of the village centre by encouraging retention and support of existing retailers whilst also encouraging new enterprise to occupy available units. We will aim to improve the quality of the public areas by making them more pedestrian focused.

6. Traffic and Parking

We are concerned that at present narrow pavements and vehicle choke points make it difficult for pedestrians and cyclists to safely move around the village. We will endeavour to improve traffic flows and pedestrian safety and we are aware that parking within the village continues to be a problem and WMPC will press for a plan that will give a village wide solution.

7. Better facilities and services

Community assets such as the play parks, pub and village hall need to be improved or re-provided. Mobile phone signals need to be strengthened and we wish to improve the sport, leisure and learning facilities to help create an environment for participation by all ages and abilities.

Objectives of the Neighbourhood Plan

- 3.2. For each of these vision themes, a set of objectives have been developed for both the Neighbourhood Plan and the Community. These have all been derived from the Neighbourhood Plan public consultation process and are reflected in our policies and supporting text. These objectives rely on the various local government and community groups to action.

The Neighbourhood Plan objectives are considered to be achievable through the application of the policies in the Neighbourhood Plan. The Community objectives will be achieved outside the Neighbourhood Plan by other community groups. These are shown in Tables 3.1 and 3.2. below.

Table 3.1: Visions and Objectives – Neighbourhood Plan Objectives

	Neighbourhood Plan Objectives	Vision Themes						
		Housing for all	An Inclusive and Caring Society	A Viable Community	Maintaining the Green Environment	An attractive village centre	Traffic and Parking	Better Facilities and Services
1	New development includes provision and management of suitable infrastructure.	y			y			
2	New developments are built with adequate parking.	y						
3	New houses are energy efficient	y						
4	Mix of housing to meet local needs	y						
5	Provide greenspace, play space, and sports fields in line with Local Plan green infrastructure requirements for new development.	y			y			
6	New development is designed to reflect local character and include comprehensive schemes for landscape and ecological enhancement to ensure that the quality and character of the Parish is not compromised.	y						
7	Provide safe routes through the village, particularly for people with disabilities		y					
8	Ensure provision of adequate sport and leisure provision for all ages.		y					y
9	Enhance the play area provision within the village.		y					y
10	To retain and protect the current allotment provision.		y		y			
11	Make the public areas more pedestrian friendly.		y					
12	Protect and enhance the vitality and viability of the village centre.			y				
13	Protect all the village heritage assets (both designated and non-designated)			y				
14	Preserve the setting and quality of the Parish Cemetery and ensure adequate future provision.				y			
15	Provide electric charging points for cars				y			
16	Conserve, enhance and link natural spaces and their associated biodiversity				y			
17	Create new green space such as meadows, woodland and orchards.				y			
18	Preserve and enhance the character and appearance of the Conservation Area					y		
19	Provide adequate short term, long term and overspill parking facilities for workers and visitors to the core business centres.						y	y

Table 3.2: Visions and Objectives – Community Objectives

		Vision Themes						
Community Objectives		Housing for all	An Inclusive and Caring Society	A Viable Community	Maintaining the Green Environment	An attractive village centre	Traffic and Parking	Better Facilities and Services
1	Provide additional sheltered housing.	y						
2	Provide improved village hall facilities		y					y
3	Support the initiative to provide a village pub.		y					y
4	Provide adequate mobile phone signals throughout the village		y	y				
5	Support and maintain the regular market in the village centre			y		y		
6	To support proposals for new initiatives to bring new business to the village, in particular to occupy available units.			y				
7	To support and protect premises and infrastructure to promote and protect local businesses and home workers.			y				
8	Provide availability of fast broadband connection throughout the village			y				y
9	Protect all important trees				y			
10	Enhance the parish treescape through planting new trees and hedgerows.				y			
11	To support the extension of the Conservation Area boundary in order to include important buildings, spaces and heritage assets.					y		
12	Making it safer for pedestrians, cyclists, and road users to move through and within the village		y				y	
13	Easing traffic flow through village and minimise delays						y	
14	Alleviation of parking problems through the provision of additional space for on-street parking.						y	
15	Reduction of illegal and inconsiderate parking		y				y	
16	Provide improved facilities for youth		y					y
17	Ensure provision of adequate sport and leisure provision for all ages.		y					y
18	Manage and protect the quiet rural lanes, bridleways and footpaths		y		y			

4. DEVELOPMENT STRATEGY

- 4.1 The growth of Wickham Market over the plan period needs to be informed by a number of key principles and issues. As a ‘large village’ in the Suffolk Coastal Local Plan (4), it provides not only for its own changing housing, employment and service needs but also those of the smaller rural villages it serves. Through the engagement with the local community in preparing the Plan, the following have been identified as being important development principles:
- Encouraging recreation and healthy living.
 - Protecting the environment, including the local landscape.
 - Encouraging and enabling walking and cycling to the schools and services in the village, so reducing the impact of vehicle traffic through the village and helping to lower air and noise pollution levels.
 - Delivering local priorities in terms of community infrastructure.
 - Ensuring a full range of housing to address local needs.
- 4.2 The Local Plan (4) provides for significant levels of housing growth in order to address the identified needs of the district over the plan period to 2036. Much of this growth is proposed to be located within the A12 corridor. This specifically identifies that between 2018 and 2036, Wickham Market’s indicative contribution is 230 dwellings, of which 150 are in the adjoining village of Pettistree. As of 1st April 2018, 10 of these dwellings had either been completed or had planning permission, reducing the requirement to a minimum of 70 dwellings in Wickham Market parish. A further 5 dwellings have been granted planning permission between 1st April 2018 and 31st March 2020, and permission for 2 of the 10 dwellings (as per table 3.5 of the Local Plan (4)) have since expired. The Local Plan has extended the settlement boundary of Wickham Market to include the allocated site (SCLP 12.60) formerly in Pettistree parish (now within Wickham Market Parish). Planning permission was granted for the development of the site in June 2021.
- 4.3 What is important is that this growth is in the right place and provides the right types of housing for our needs. The growth needs to be supported by the infrastructure that is most needed in Wickham Market and will provide the greatest benefit to the wider community. The Neighbourhood Plan’s core development principles are based around these key considerations. These matters are addressed in Part C of Policy WICK1. The Parish Council fully support the Local Plan where it proposes that, for proposals of 10 units or more, at least 50% of the dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4 (2) of the Building Regulations.
- 4.4 The Wickham Market Housing Needs Assessment (5) identifies a requirement for the Wickham Market Neighbourhood Plan to allocate sites within the parish to address a requirement for between 32 and 110 additional dwellings over the Plan period. It was decided, in early 2018, that this assessment should be taken as the housing need to be provided and that the upper limit should be the planning figure. Subsequently the Local Plan (4) was published allocating Wickham Market a housing figure of 230 dwellings of which 150 were allocated in Pettistree Parish. The site is not within the Neighbourhood Plan boundary but is within the settlement boundary of Wickham Market. Planning permission was subsequently granted for this development on 3rd June 2021 (ref DC/20/3264/FUL), DC/20/3361/FUL was withdrawn.
- 4.5 Following extensive assessment, consultation and consideration of the Wickham Market area, the WMNP allocates two sites (33) (10) for development which are expected to deliver housing

along with a range of specific infrastructure and community facilities. More generally, these allocations and other developments are expected to provide high quality schemes which are in keeping with the character of Wickham Market, minimise their impact on the landscape, generally enhance the public realm and improve accessibility for pedestrians and cyclists through improvements to road safety and congestion.

POLICY WICK1: DEVELOPMENT STRATEGY AND PRINCIPLES

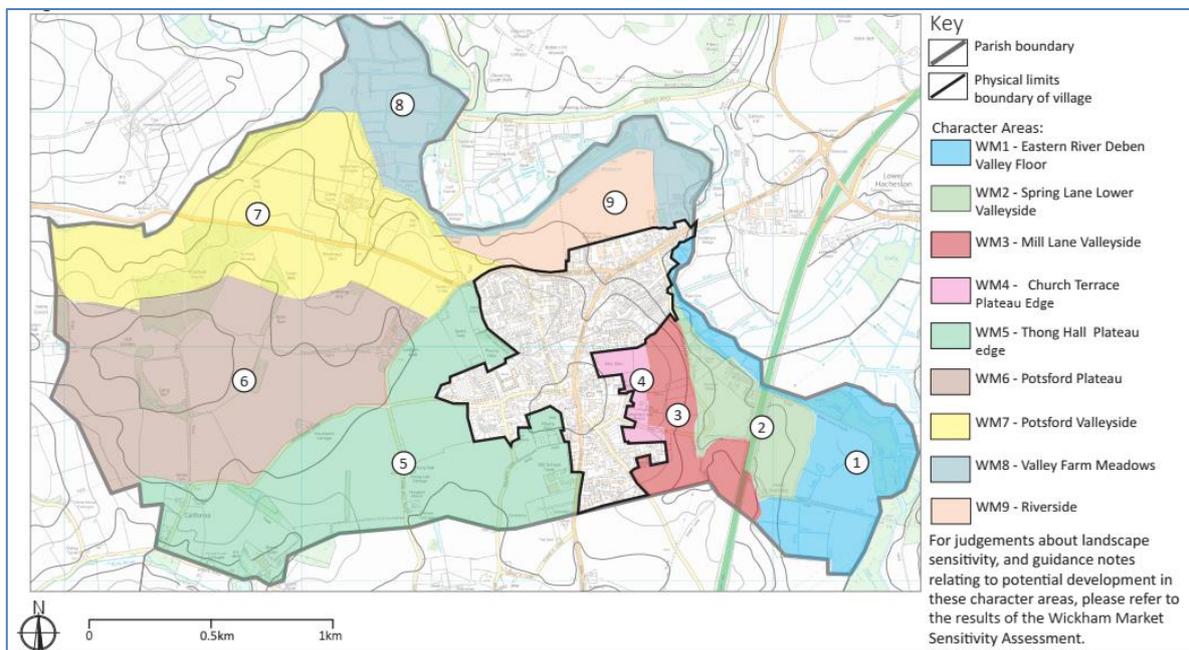
- A. New development in the Wickham Market Neighbourhood Plan area will be focused within the settlement boundary of Wickham Market village and on the site allocations in Policies WICK12 to WICK13 as identified on the Policies Map.**
- B. New developments of up to 110 dwellings will be supported within the site allocations at land at Old School Farm (up to 85 dwellings) and land at Simon's Cross (up to 25 dwellings), in accordance with the requirements as outlined in Policies WICK1 and WICK2. These numbers reflect the density of developments which are consistent with existing development within Wickham Market.**
- C. Housing developments should provide a mix of dwellings in accordance with relevant policies contained in the Local Plan.**
- D. As appropriate to their scale, nature and location, development proposals should address the following matters:**
- **the provision of new housing which addresses evidence-based needs as set out in the Wickham Market Housing Needs Assessment.**
 - **the provision of key infrastructure including pedestrian access to the village centre, additional car parking serving the village centre, community facilities, utilities, and public realm improvements, through direct provision and/or developer contributions (including Community Infrastructure Levy and/or Section 106) as directed in the relevant policies.**
 - **high quality design of buildings and layouts which include high quality natural landscaping in order to retain the rural character and physical structure of Wickham Market, conserving, and where possible, enhancing the historic environment.**

5. LANDSCAPE AND ENVIRONMENT

Landscape character

5.1 Whilst Wickham Market is not in any statutorily designated landscape, the northern and eastern parts of the parish were within the Suffolk Coastal Special Landscape Area (SLA). SLAs were designations contained in Policy SSP38 of the Site Allocations and Area Specific Policies DPD (2017). The Local Plan (4) has removed this designation and relies on the landscape character assessment approach. The Neighbourhood Plan has been informed by a specific Landscape Character Assessment (LCA) (7) (8) (9), this identifies the landscape character types shown in Figure 5.1. The Suffolk Coastal Landscape Character Assessment (34) has also been used to inform the Neighbourhood Plan.

Figure 5.1: Wickham Market landscape character types



Source: Wickham Market Landscape Character Assessment 2018

5.2 The Wickham Market LCA noted that a number of these character areas were sensitive to development and identified common issues needing careful consideration, including the view of the spire of All Saints Church.

View from Thong Hall Road towards village edge



Source: Wickham Market Landscape Character Assessment 2018

- 5.3 It is important that development protects the landscape setting of Wickham Market and is informed by the LCA. In particular, development on the edge of the settlement, or that which is prominent in the landscape, should demonstrate what measures are proposed to adequately mitigate adverse impacts. This may be through comprehensive landscaping, the retention of mature trees and hedgerows and the design of the built environment. In addition, the landscape character of Wickham Market is informed by its network of lanes, byways, footpaths. Development should ensure that these are retained and that their appropriate use is encouraged, including by cyclists, pedestrians and horse riders.
- 5.4 Layout of any new development is required to follow best practice advice found in the government's guidance documents: 'Manual for Streets' and 'Manual for Streets 2' (35) (36).

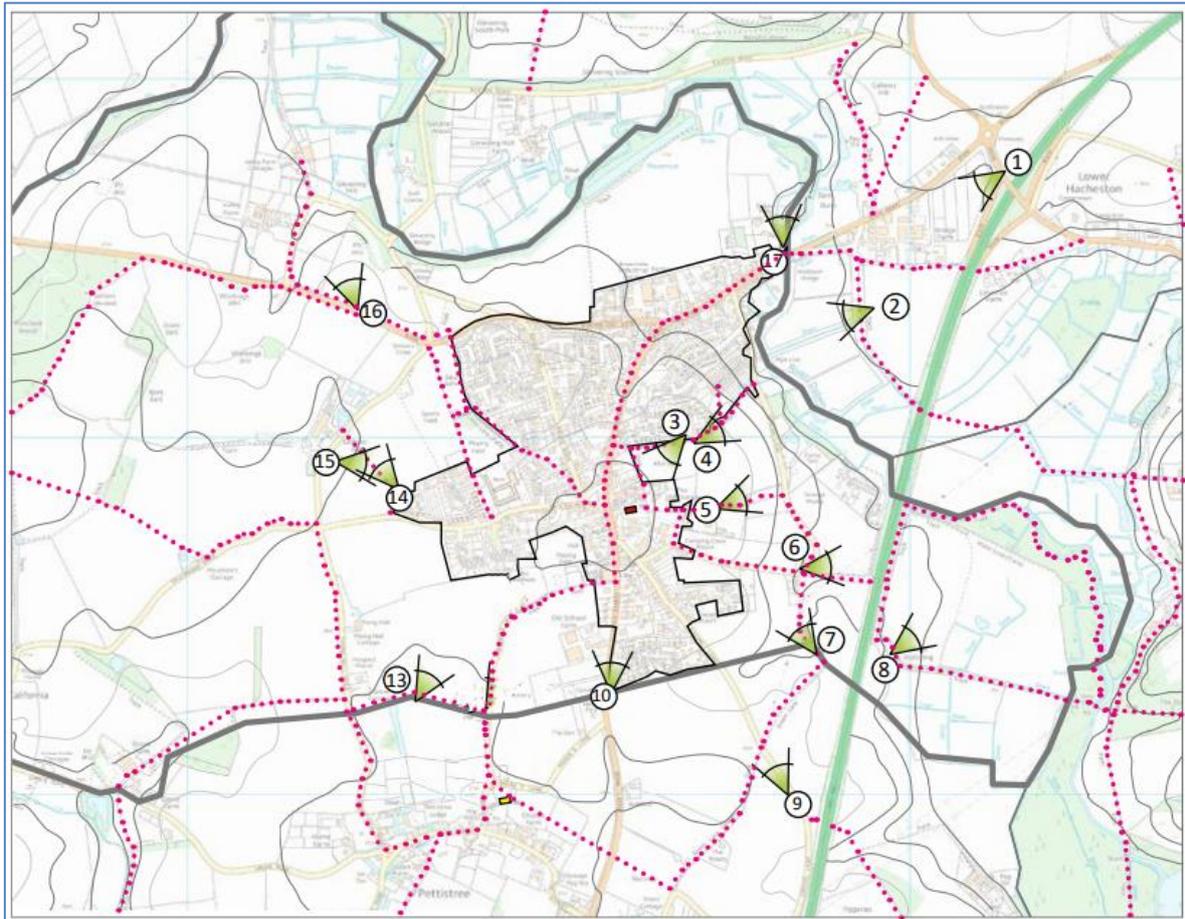
POLICY WICK2: LOCAL LANDSCAPE CHARACTER

- A. Proposals for development should demonstrate how they have been informed by the special qualities and features in the Wickham Market Landscape Character Assessment 2018 (including, where relevant, the mitigation measures identified in the Wickham Market Landscape Sensitivity Assessment 2018) or successor and site-specific landscape evidence.**
- B. In particular, development proposals should demonstrate their location, scale, form, design and materials will protect and where practicable, enhance the following:**
- **The special qualities and features of the area.**
 - **The visual relationship and environment around settlements and their landscape settings.**
 - **Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors.**
 - **Visually sensitive skylines (significant local views are specifically identified in Policy WICK3).**
 - **The network of green infrastructure supporting health, wellbeing, and social interaction.**
- C. Proposals for development should secure the retention, preservation and appropriate restoration or enhancement of natural, historic, or manmade features across the Neighbourhood Area as identified in the Wickham Market Landscape Character Assessment and successor landscape evidence.**
- D. Proposals for development should ensure that development is sensitively and effectively integrated into the landscape in order to secure the enhancement of habitat and green corridors, connectivity to the surrounding green and blue infrastructure and Public Rights of Way network.**

Views

- 5.5 In a relatively flat landscape such as that surrounding Wickham Market, there are a number of long-distance views of significance (8). It is important that the integrity of such views is retained. The nature of such long-distance views is that they are both into and out of Wickham Market, and therefore some may relate to development outside the parish boundary. In particular, this concerns residential development abutting the Neighbourhood Plan area boundary. Pettistree is a small village that is adjacent to Wickham Market. The growth proposed in the Local Plan (4), whilst formerly in Pettistree parish, now forms an extension of Wickham Market village. It is particularly important that, to retain their distinct identities, the two settlements are not allowed to coalesce. One of the main implications of such a scenario would be the loss or significant reduction in the quality of a number of views in both directions.
- 5.6 The proposed EDF/SZC southern park and ride site, located in Hacheston parish, associated with Sizewell C is on the skyline to the north of the village adjacent to the A12. This is an example of a neighbouring development which could have a detrimental impact on views from Wickham Market parish.
- 5.7 The Wickham Market Neighbourhood Plan will not form part of the development plan in neighbouring parishes. However, where development proposals in neighbouring parishes are likely to impact on views from Wickham Market parish, developers will be encouraged to demonstrate how the requirements of Part A of policy WICK3 are met. The parish council will work with other parishes and the LPA to encourage suitable design and mitigation.
- 5.8 The Wickham Market Landscape Assessment document (8) identified a number of key views both into and out of the parish. It is important that when development comes forward, in the parish it takes into account key views and is informed by the Landscape Character Assessment - Key Views Assessment document (8) which is available on the Neighbourhood web site. Key views 11 and 12, shown in the Key Views Assessment document, have not been carried forward into the Neighbourhood Plan, due to their overlap with the allocation of land at the Old School (policy WICK12) (37)

Figure 5.2: Key views into and out of Wickham Market



Source: Wickham Market Landscape Character Assessment 2018 (with views 11 and 12 removed)

..... Footpaths

POLICY WICK3: KEY LOCAL VIEWS

- A. The scale, form and design of development proposals should protect and, where practicable, enhance key local views as identified on the Policies Map. This process should be informed by the Wickham Market Landscape Character Assessment Part 2 (2018) - Key Views.**
- B. Development proposals which would have an unacceptable impact on an identified key local view will not be supported**

Biodiversity

- 5.9 The Suffolk Nature Strategy 2015 (38) included a recommendation that Neighbourhood plans should include reference to protecting and enhancing local environmental assets. East Suffolk Council have developed the Recreational Avoidance and Mitigation Strategy (RAMS) (39) to mitigate recreational disturbance impacts on habitats sites. The approach set out in the RAMS document will apply across the Neighbourhood Plan area.
- 5.10 The design of housing developments, new buildings, green and open spaces, and boundary treatments, should ensure that the biodiversity of species in the area can not only survive but thrive. This is crucially in line with the NPPF (2) requirement to achieve net gains for biodiversity through all new development. Wickham Market still has populations of particularly vulnerable species such as hedgehogs, grass snakes and swifts. Measures to protect and enhance their habitats should be considered with any development proposals. Examples include:
- Designing developments, houses and green and blue infrastructure and spaces so that there is space for wildlife. For example, at the individual building scale, incorporating integral bird and bat boxes under the eaves of the new houses, or creating artificial nests sited in places away from windows and doors, can create vital new roosting sites to support populations of birds and bats.
 - Boundary treatment between dwellings must be designed to be sensitive to the need for hedgehogs and birds to use the spaces and move around. Hedges or permeable fences should be used wherever possible.
 - New planting schemes should focus on native and locally appropriate species to ensure that they provide habitat for birds, amphibians, and insects and support bees and other pollinators by including nectar-rich plants. Advanced planting will be required in order to ensure that early landscape mitigation is incorporated. Occupiers of new housing developments can be encouraged to adopt a wildlife-friendly approach to gardening through inclusion of educational literature in ‘home-information’ packs. All schemes should be appropriately managed through specific landscape and environmental management plans.
 - Veteran, mature, specimen trees, copses and hedgerows should be retained and incorporated into landscaping in new developments and suitably protected. Natural features often create attractive features and habitats and can provide focal points for public open space. Natural vegetation, even where it is of declining condition can be retained to provide habitat and part of the food chain for a variety of species. Grassland, hedgerows, ponds and scrub offer good habitat for species such as hedgehog, amphibians and grass snakes.
- 5.11 Wickham Market parish is within proximity of habitats sites designated for their international wildlife value, including the Sandlings Special Protection Area to the south and east, and the Alde and Ore Estuary and Deben Estuary Special Protection Areas and Ramsar sites also to the south and east. The Staverton Park and the Thicks, Wantisden Special Area of Conservation is located to the east of Wickham Market.

Effective Sustainable Drainage Systems and biodiversity

- 5.12 The issue of flooding has been raised consistently during the engagement phase for the Neighbourhood Plan. The Neighbourhood Plan presents an opportunity to encourage effective urban drainage solutions that can add additional capacity and flexibility to water drainage systems in cost effective ways.
- 5.13 Sustainable Drainage Systems (SuDS) provided on new developments should be made attractive and accessible to people and designed to enhance biodiversity, in line with the requirements of the NPPF. Opportunities should be sought to mitigate the increasing threat of water stress through effective water capture, integration into new development and positive management of the systems. When determining the appropriate SuDS method, developers need to give consideration to green infrastructure value as well as the basic function of moving water away from the built form. This is particularly important, given that well-designed SuDS can not only improve the environment and provide biodiversity benefits, but can also provide a place for residents and others to enjoy and be closer to nature.
- 5.14 Recent developments in Wickham Market have often failed to take full advantage of the benefits of well-designed SuDS schemes leading to localised problems with flooding.
- 5.15 There are many examples elsewhere of creative use of space within developments where a 'multi-value' approach to SuDS provision has been adopted. The common theme is that a wide range of techniques and approaches have been used to maximise the potential for SuDS to mitigate climate change. These approaches start from the point that SuDS is about more than just flood mitigation and that, importantly, good design means SuDS can be provided even where there is very little available space. For example, when rainwater or greywater is captured, it can be used to keep greenery watered and to generally cool the ambient temperature of built development. The provision of SuDS can also be provided through the use of green roofs, permeable surfaces and rain gardens. In this regard, even the very smallest developments can make a contribution.

POLICY WICK4: PROVISION FOR WILDLIFE IN NEW DEVELOPMENT

- A. As appropriate to their scale, nature and location, development proposals should incorporate design features which both protect and enhance the ability of wildlife to thrive. Development proposals should provide net gains for biodiversity. In particular, new development proposals should incorporate measures and appropriate spaces to retain and protect trees and hedges, provide for new native plant species (including within drainage swales), wildlife corridors, specific amphibian, bird and bat measures, and wildlife friendly boundaries. This should be complemented by construction management processes which ensure that there is no harm to wildlife and biodiversity.**
- B. New housing development should incorporate on-site sustainable drainage systems (SuDS) wherever technically feasible. Wherever practicable, and as appropriate to their scale, nature and location, new housing development should also incorporate a wide range of creative SuDS solutions including the provision of SuDS as part of green spaces, green roofs, permeable surfaces, and rain gardens.**
- C. SuDS provision should be designed to enhance green infrastructure, wildlife and biodiversity as well as minimise the impacts of flooding.**

Renewable energy and carbon reduction

- 5.16 It is vital that new development both minimises its own impact in terms of emissions (created by its construction and use) and takes advantage of the opportunities it creates to provide renewable energy. The guidance given in the Local Plan Policy SCLP9.2 is strongly supported. In addition, the guidance given in “Neighbourhood Planning in a Climate Change Emergency” (40) on “Binding Energy Performance Standards for New Housing” (pages 43 & 44) has been taken into account in preparing the Neighbourhood Plan.
- 5.17 It is appreciated that this Neighbourhood Plan cannot specify that all new development is carbon neutral. However, changes to Part L of the Building Regulations, introduced in June 2022, require dwellings to produce around 30% lower carbon emissions than the previous 2013 Regulations. Further, the provision of solar PV panels is strongly supported by the Neighbourhood Plan. It is important that development does not minimise the potential for such provision at a later date. Development should be designed and laid out to ensure that as many of the roofs of new dwellings face the direction and have a pitch that maximises their potential to receive solar energy. Therefore, at a subsequent time when the owner of the property wishes to put solar panels on the property, it will be ensured that the potential to generate renewable energy from solar is maximised.
- 5.18 In relation to water efficiency, Policy SCLP9.2 of the Suffolk Coastal Local Plan expects all new residential development to achieve the optional technical standard for water efficiency (110 litres/person/day). However, if such provision is demonstrated to contribute towards making a development unviable then it is important that development does not minimise the potential for such provision at a later date by the homeowners or by the Registered Provider in the case of affordable housing.
- 5.19 Equally, if residential properties are not fitted with greywater recycling systems, then it should be ensured that their design enables retrofitting of such systems. All properties should incorporate the fitting of water butts of external rainwater pipes.
- 5.20 There is likely to be an increase in the use and ownership of electric vehicles. All new development should make provision for electric charging facilities which is adequate to meet the needs of all households within the development.

POLICY WICK5: DESIGNING FOR RENEWABLE ENERGY AND CARBON REDUCTION

- A. All new housing development should achieve water efficiency through the use of measures such as grey water, rainwater harvesting and SuDS schemes.**
- B. The layout and design of new housing development should be configured to secure the optimum use of natural sunlight and solar gain including enabling the provision of solar energy generation measures.**
- C. Development requiring parking should make provision for on-plot electric charging facilities which is sufficient to meet the needs of all households within the development as recommended by the most up to date Suffolk Guidance for Parking.**

Green Infrastructure including Local Green Spaces

- 5.21 Green infrastructure contributes to the quality and distinctiveness of the local environment. It creates opportunities for walking and physical activity and generally adding to the quality of life. Green infrastructure is diverse in character and can include formal parks, and gardens, informal grassed areas, lineal paths, towpaths, sports pitches and various other kinds of landscaped area. Many of these examples are found in Wickham Market.
- 5.22 Under the NPPF (2), Neighbourhood Plans have the opportunity to designate Local Green Spaces which are of particular importance to them. This will afford protection from development other than in very special circumstances.
- 5.23 The following areas have been assessed against the criteria of the NPPF (2) and have been designated as Local Green Spaces. More information including the location of these green spaces and the assessment criteria they fulfil are given in the Local Green Space Assessment document (12) which is available on the NP web site:
1. The Triangular Field on the B1078
 2. The Simon's Cross Playing/sports Fields
 3. Wickham Market Primary School Playing Fields
 4. The Glebe Allotments
 5. The Beehive Field
 6. The Red Triangle Bowling Green
 7. All Saints Churchyard
 8. The Church Pightle
 9. The Village Hall Playing Field
 10. The Parish Cemetery
 11. The Simon's Cross Allotments

The policy takes on the matter-of-fact format of paragraph 103 of the NPPF. East Suffolk Council will be able to make its own assessment of the extent to which any development proposals are consistent with the designation of the various local green spaces. This may include any proposals for an ancillary feature to an identified local green space, and where it can be clearly demonstrated that it is required to support or enhance its role and function.

POLICY WICK6: LOCAL GREEN SPACES

A. The following areas shown on the Policies Map are designated as Local Green Spaces:

- 1. The Triangular Field**
- 2. The Simon's Cross Playing Fields**
- 3. Wickham Market Primary School Playing Fields**
- 4. The Glebe Allotments**
- 5. The Beehive Field**
- 6. The Red Triangle Bowling Green**
- 7. The Village Hall Playing Field**
- 8. All Saints Churchyard**
- 9. The Church Pightle**
- 10. The Parish Cemetery**
- 11. The Simon's Cross Allotments**

B. Development proposals for local green spaces will only be supported in very special circumstances.

6. HISTORIC ENVIRONMENT

Heritage and visual amenity value of open, green and treed spaces within the Conservation Area

- 6.1 One of the distinctive features of historic Wickham Market village is the number of open, green and treed spaces that break up the built form. These green spaces often provide space for trees and hedges to thrive and enhance the character and appearance of the Conservation Area and village. These spaces contribute to the setting of the 37 listed buildings within the Conservation Area. A number of the spaces are publicly accessible whilst others are private gardens and spaces where activities such as the felling of trees and inappropriate development are likely to have a detrimental effect.
- 6.2 Areas to be Protected from Development were identified in the superseded Suffolk Coastal Local Plan. The previous policy stated that development within these areas would be severely restricted to maintain the character of the area. Areas to be protected from development no longer feature in the Local Plan (4). However, there are policies and guidance relating to Local Green Space (see WICK6) and the Conservation Area Appraisal (18), which affords protection to important open green spaces in the community. Specifically, the Churchyard, Church Pightle and the former vicarage gardens are still considered to warrant protection (as was afforded by the former Local Plan Policy AP28). The Local Plan policies which are relevant and to be applied are SCLP11.5 Conservation Areas and also the requirements of the Listed Building and Conservation Act to preserve or enhance such heritage assets and their settings. Local Plan Policy SCLP8.2 Open Spaces also applies.
- 6.3 The Wickham Market Conservation Area Appraisal (CAA) 2016 (18) identifies a number of important open/green/treed spaces which are considered to contribute, in their undeveloped form to both the historic and visual character of the Conservation area. It specifically mentions the importance of numerous garden spaces forming the setting to many fine houses and groups of dwellings.
- 6.4 Many other gardens, gaps and trees in the Conservation Area also perform an important role in providing space and greenery that breaks up the built form. Whilst Policy SCLP5.7 of the Local Plan (4) supports appropriate development in rear gardens, it does state that Neighbourhood Plans are able to set their own policy in response to local circumstances. Clearly there is a need to ensure that any development in the Conservation Area preserves and enhances its character and it is unlikely that development in garden spaces will do that.
- 6.5 Within the Conservation Area it is considered that anything other than ancillary development is harmful to the character of the Conservation Area and it will not be supported. Where ancillary development, alterations or the felling of the trees is harmful to local character then that will also be considered as inappropriate. Development outside the Conservation Area which harms the setting of the Conservation Area will also be considered inappropriate.
- 6.6 It should be noted that green spaces as defined in policy WICK7 perform a necessary and different role to those designated as Local Green spaces as defined in WICK6.

POLICY WICK7: PRESERVING AND ENHANCING OPEN, GREEN AND TREED SPACES IN THE WICKHAM MARKET CONSERVATION AREA

- A. Development proposals should respond positively to the important open, green and treed spaces within the Wickham Market Conservation Area which make a significant contribution to the character and appearance of the Conservation Area in their undeveloped form. Development proposals which would involve the loss of the open, green and treed spaces or cause unacceptable harm to their character and appearance will not be supported.**
- B. Development proposals including the removal of good quality trees on or adjacent to these ‘important green spaces’ identified on the Policies Map should indicate how the character of the Conservation Area will be preserved or enhanced.**

- 6.7 The Wickham Market Conservation Area does not extend across the whole of the village. This has been recognised in the CAA and it is proposed that a review of the boundary will be undertaken by ESC in due course. Such a review is supported by the Neighbourhood Plan and, in preparing the CAA, a number of areas were identified by the community where they considered it would be appropriate to extend the Conservation Area. It will therefore be important that the community of Wickham Market, through the Parish Council, is involved in the review process at the appropriate time.
- 6.8 There is concern regarding the loss of valuable trees with visual amenity within the village and the Conservation Area. The WMPC will continue to work with the Local Planning Authority and expect such trees to be protected by the use of Tree Preservation Orders where there is the opportunity to do so. Positive management of trees will be encouraged where opportunities exist.

Heritage assets

- 6.9 Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Guidance from the NPPF is that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- 6.10 Designated Heritage Assets within Wickham Market are those buildings and two bridges which have been ‘listed’ by Historic England (19). There are 42 structures which are classified as Grade II and II* within the parish of Wickham Market. These are protected by national and local plan policy.
- 6.11 The Local Plan (4) Policy SCLP11.6, encourages the identification of ‘non-designated heritage assets,’ provided they meet a number of criteria as set out in the Local Plan (appendix F) (41). A non-designated heritage asset can be a building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions. WMNP have currently identified a number of properties, artefacts, and ancient woodland which merit the term of ‘non-designated’ heritage assets. These are shown in the list below. More information is given in the Non-Designated Heritage Assets document (11) which is

available on the web site (1). The locations of these non-designated heritage assets can be seen in the policy map section at paragraph 10.

1. Milepost on the High Street outside No. 178.
2. Entrance to Whitmore and Binyon Ironworks, High Street
3. The Village Pump on the High Street
4. The War Memorial, Chapel Lane
5. Pill Box, Gelham Hall Lane
6. The Old School, High Street
7. The Old Workhouse, Deben Court, Chapel Lane
8. Flint Cottages 52 & 56 Border Cot Lane
9. The Gallows, Potsford Wood
10. Flint Cottages, 40 & 42 Dallinghoo Rd
11. Rendered Cottages, 23 & 23a Dallinghoo Rd
12. Waterloo House, Chapel Lane
13. Orchard House, High Street
14. Thong Hall and Thong Hall Cottage, Thong Hall Road
15. 198 High Street
16. Parish Cemetery and Bier House
17. Home Covert (ancient woodland)
18. Potsford Wood (ancient woodland)

- 6.12 The policy applies the national approach set out in paragraph 203 of the NPPF. Within this wider context proposals for the re-use of non-designated heritage asset structures will be supported if they are compatible with the significance of the asset, including its setting, and use appropriate materials and designs in any construction work. Applications should be accompanied by a heritage statement describing the significance of any heritage asset affected. The adaptive reuse of a non-designated heritage asset should not cause substantial harm to its physical structure or setting. Where substantial harm is unavoidable, it must be clearly and convincingly justified in the heritage statement. In considering proposals which involve the loss or alteration of a non-designated heritage asset, the criteria set out in Local Plan Policy SCLP 11.6 will apply to built assets. In addition, for non-built features consideration will be given to the impact on the feature and how damage will be avoided.

POLICY WICK8: NON-DESIGNATED HERITAGE ASSETS

A. The Plan identifies a series of non-designated heritage assets as follows:

- 1. Milepost on the High Street outside No. 178.**
- 2. Entrance to Whitmore and Binyon Ironworks, High Street**
- 3. The Village Pump on the High Street**
- 4. The War Memorial, Chapel Lane**
- 5. Pill Box, Gelham Hall Lane**
- 6. The Old School, High Street**
- 7. The Old Workhouse, Deben Court, Chapel Lane**
- 8. Flint Cottages 52 & 56 Border Cot Lane**
- 9. The Gallows, Potsford Wood**
- 10. Flint Cottages, 40 & 42 Dallinghoo Rd**
- 11. Rendered Cottages, 23 & 23a Dallinghoo Rd**
- 12. Waterloo House, Chapel Lane**
- 13. Orchard House, High Street**
- 14. Thong Hall and Thong Hall Cottage, Thong Hall Road**
- 15. 198 High Street**
- 16. Parish Cemetery and Bier House**
- 17. Home Covert (ancient woodland)**
- 18. Potsford Wood (ancient woodland)**

B. In determining development proposals that directly or indirectly affect non designated heritage assets, a balanced judgement will be taken having regard to the scale of any harm or loss and the significance of the heritage asset.

7. TRANSPORT AND MOVEMENT

- 7.1 Wickham Market village attracts many people to use its shops and services as it is the hub for some 26 surrounding villages. Most people travel to the village by car as Wickham Market station is in Campsea Ash some 2.3 miles from the village centre and the bus service is poor, however it is sometimes difficult to find a parking space. Inadequate public parking is increasingly an issue for many who visit. Many village residents also travel by car for safety reasons as the pavements are very narrow in places and there are no suitable cycle routes. The need is to provide improved walking and cycling routes into the village and key locations such as the Primary School.

Public Car Parking

- 7.2 In April 2020, as part of a car parking review, ESC removed the reduced rate long stay business car parking scheme which significantly increased long stay business car parking charges. The new charges make it too expensive for lower paid workers who now park on the Village Hall car park where there is free parking. During the COVID-19 pandemic this has not caused too much impact but will severely impact on parking availability for the users of the Village Hall in future. In November 2020 ESC implemented their review in full changing the pricing structure and the amount of free time available, the impact of this change has not been fully assessed. However, reducing the free parking allowance to half an hour at the Chapel Lane car park is already causing problems for patients at the Medical Centre. In addition, the new Sunday parking charge on the Hill significantly impacts worshippers at the Parish Church.
- 7.3 This situation is unsustainable and highlights the need for affordable long stay parking for business and retail workers many of whom are part time and on low income. The car parking need now is different to that which was assessed at the Regulation 14 stage of this Neighbourhood Plan. As a consequence, the need and best location for a new car park must be reassessed. It is noted that further pressure will be added as significant housing development is planned within the Wickham Market settlement boundary and in the local area generally. The George pub is due to open in 2023 which will further add to these pressures as it will not have its own parking facility.

This issue will be addressed as a Community Action – see Table 9.1.

Parking Guidance for New Developments

- 7.4 Residential developments must be designed with adequate parking in order to prevent parking spilling over onto the public highway and pavements. The previous SCC parking guidance (2002) was written to try to encourage people to use public transport, but this has had a detrimental effect on rural communities that depend on the car as the primary means of transport. This point is made clearly in the Foreword of the SCC Parking Guidance 2019 (42). In reality, the coverage and frequency of public transport is generally insufficient to meet the needs of rural communities who continue to depend on the car as a primary means of transport. The Local Plan (4) adopts the new guidance for all parking except those elements relating to Residential Parking Design, as set out in Local Plan Policy SCLP7.2, but the WMNP adopts the SCC Parking Guidance 2019 (42) in full. The matter is addressed in Policy WICK9. It acknowledges that there may be circumstances where the parking requirements may be impractical or where the transport requirements of the residents of the houses concerned can be satisfied in an alternative fashion. This is a matter which East Suffolk Council will be able to address on a case-by-case basis throughout the Plan period.

On-Street Car Parking

- 7.5 Many residents require on street parking as their houses have no or inadequate integral parking facilities. The road widths are not always sufficiently wide enough to allow parking on one side of the road and also facilitate two-way traffic. The problem is exacerbated as some pavements are either too narrow or too wide. This situation could be improved through a combination of adjustment of pavement widths and installation of parking boxes at critical points in the road network. WMPC will work with SCC Highways to seek improvements through the CIL and other sources of funding.

This issue will be addressed as a Community Action – see Table 9.1.

Public Transport

- 7.6 WMPC has little influence over Public Transport, and it is not a planning policy matter. However, WMPC is committed to working with Suffolk County Council and the private bus company to try to ensure that there is a continued provision of an adequate bus service for Wickham Market. WMPC are members of ESTA (East Suffolk Travellers Association) which is set up to promote public transport within Suffolk. Through membership of this group WMPC will endeavour to improve public transport links for the village.

POLICY WICK9: CAR PARKING

- A. All residential development proposals should provide car parking to meet the standards in the 2019 Suffolk County Council Suffolk Parking Guidance. Development proposals which do not meet the relevant standards will only be supported where it can be demonstrated either that the standards are impracticable for the site concerned or that alternative arrangements are in place to address the transportation needs of the occupiers of the dwellings concerned.**

Pedestrian Safety

- 7.7 Road layout, traffic and roadside parking combine to significantly introduce safety hazards to pedestrians from vehicles driving over, and parking on, pavements in several parts of the village. The historic layout of Wickham Market village means that there are certain crossings and pinch points where pedestrian movement is particularly unsafe. More detail is given in the Wickham Market Traffic and Parking paper dated 2014 (23). There are five particularly difficult crossing locations:
1. High St – The Coop to the War Memorial
 2. High St – The Post Office to the Hill
 3. High St – E W Revett & Son Butcher to the George Public House
 4. Dallinghoo Rd – The Hill to beyond the row of terraced houses which includes the British Legion
 5. Broad Road – Entering The Hill
- 7.8 Vehicles will sometimes mount the pavement in order to get through due to the narrowing of the roadway. The Dallinghoo Road location does not have a pavement but is narrow and is one of the main walking routes to the primary school with obvious consequences.

- 7.9 Whilst the Neighbourhood Plan process has not identified any specific solutions to these safety issues the WMPC needs to investigate options and proposals with primary objectives of:
- Making it safer for pedestrians, cyclists, and road users to move through and within the village.
 - Easing traffic flow through village and minimise delays.
- 7.10 This would also have the secondary objectives of:
- Alleviation of parking problems through the provision of additional space for on-street parking.
 - Reduction of illegal and inconsiderate parking.
- 7.11 It is intended that the highest priority options will be achieved using available funds. The Parish Council has been working with EDF on traffic calming measures to mitigate the impact of traffic arising as a result of Sizewell C's Southern Park & Ride car park planned just north of the village. The Plan seeks to take account of these works and to ensure that funding is secured for some mitigation measures which might include speed reduction to 20mph. This and other suggested proposals put forward by the Parish Council are set out in paragraph 7.14 and are referred to in Table 9.1 Community Actions. Where it is considered necessary, and as identified by local traffic survey work, the provision of infrastructure improvements to enhance pedestrian safety should be secured via the necessary conditions and/or legal agreements.

POLICY WICK10: PEDESTRIAN SAFETY

- A. Major development proposals (as defined in the NPPF) should demonstrate that they have been prepared constructively to ensure that the development does not have an unacceptable impact on pedestrian safety on the following sites:**
- a. High Street – War Memorial to the Coop**
 - b. High Street – The Hill to the Post Office**
 - c. High Street – The George Public House to E W Revett & Son Butcher**
 - d. Dallinghoo Road – The Hill past the Royal British Legion**
 - e. Broad Road entering The Hill.**

Walking, cycling and disability access.

- 7.12 It is necessary to protect and enhance the Public Rights of Way in the village. Allied to this is the safety of pedestrians, it is necessary to improve generally the quality of routes between the main residential areas and key destinations in the centre of the village, including the shops, Post Office and the Primary School. Such improvements are necessary to encourage residents to undertake more of these short journeys on foot, bicycle, or mobility scooters.
- 7.13 The key access routes are along the High Street, Broad Road, and Dallinghoo Road where they directly serve residential areas and the school. These routes should be the focus of investment, primarily from Community Infrastructure Levy, in new and improved walking and cycling infrastructure. This could include widening of the footways (particularly where this improves the usability for disabled users), particularly where traffic levels are highest, the provision of new pedestrian crossings and the creation of cycle lanes or shared paths. It will also be important that new development provides easy and safe pedestrian and cycle access to it.

POLICY WICK11: CYCLING, WALKING AND DISABILITY ACCESS ROUTES

- A. Development proposals to improve cycling, walking and disabled access will be supported. Provision of improved cycle and pedestrian/disabled access routes that are physically separated from vehicular traffic and from one another will be strongly supported. Such routes should also incorporate access for disabled users and users of mobility scooters.**
- B. As appropriate to their scale, nature, and location, new developments should ensure safe pedestrian and disabled access that link into the existing network, ensuring links to the village centre, retail facilities, primary school and High Street are retained and enhanced where practicable.**
- C. Proposals to enhance the walking, cycling and mobility scooter infrastructure along the High Street will be strongly supported.**
- D. Proposals that would have an unacceptable impact on the walking and cycling infrastructure along the High Street will not be supported. Mitigation measures will be sought in relation to highway safety and pedestrian access where harm is identified as a result of additional traffic movements.**

Potential Improvement Works

7.14 Wickham Market Traffic and Parking Working group has been addressing the problems listed above. A Traffic and Parking paper addressing the majority of these issues was written in November 2014 (23). Since then, significant additional work has been done by the group including measuring traffic speed and volume in 36 different locations. In addition, further work has been carried out in the village to ascertain the potential impact of a Park and Ride scheme just north of the village planned for the construction phase of Sizewell C nuclear power station. This work has led to the following proposed improvements:

1. Extending the 30mph speed limit further out from the village on Border Cot Lane.
2. Widening of pavement adjacent to the Post Office to improve pedestrian safety and create a one-way traffic priority system.
3. Creation of a raised area at the Chapel Lane/High Street junction to allow safe crossing of pedestrians and slow traffic down.
4. Devising a method to indicate safe pedestrian walking down Dallinghoo Road from the Hill past Hill House, this being the main school access route.
5. Adjustment of pavement widths and the installation of suitably spaced parking boxes on High Street from Rackham's bridge to Border Cot Lane.
6. Widening of pavement adjacent to E W Revett & Son, 87 High Street to improve pedestrian safety and create a one-way traffic priority system.
7. Creating 20mph zones through parts of the village road network to improve safety.
8. Installation of permanent flashing speed signs on the B1078 just after entering speed limit signs and on the B1438 when entering the 30mph speed limit from the south.
9. Install village gateway on B1078 Border Cot Lane west approach.
10. Install village gateway on B1438 southern approach.
11. Install gateway on B1078 northern approach just north of Rackham's bridge.
12. Adjustment of pavement widths and the possible installation of parking boxes on High Street from Border Cot Lane to Yew Tree Rise.
13. Traffic calming zone at the B1078 and High Street junction.
14. Pedestrian crossing for Bus Stop on High Street near Spring Lane.
15. Traffic calming zone at High Street, Spring Lane Junction
16. Improve pedestrian safety on Broad Road as it enters The Hill.

The WMPC are pressing SCC to implement these improvements whilst securing funding for them through CIL and other funding sources.

8. SITE ALLOCATIONS

- 8.1 The Suffolk Coastal Local Plan (4) allocates Wickham Market an indicative minimum of 70 dwellings within the parish boundary. This is in line with the Wickham Market Housing Needs Assessment (5) which identified a requirement to allocate sites to address a requirement for between 32 and 110 additional dwellings over the Plan period. Particular sites put forward through the Suffolk Coastal Local Plan ‘Call for Sites’ process were considered.
- 8.2 As a result of this process, the Neighbourhood Plan allocates two sites for approximately 110 dwellings. Two sites were considered to be most suitable (33) (10) for development in the Site Assessment and to fulfil our requirements as stated in the independent Housing Needs Assessment (5).

Old School Farm, High Street

- 8.3 The Old School Farm site was one of two sites which were considered suitable for development in the Site Assessment report (10). In order to preserve key views and to maintain a visual separation between Wickham Market and Pettistree the west boundary of the development area has been set back from Walnuts Lane. Vehicular access to the site will be from the High Street (B1438). Pedestrian access routes to the School and village are good. Adjacent to the site is the opportunity to provide informal green space on the field known as The Penny Field, which lies on the west side of the Village Hall playing field.
- 8.4 The Old School building is listed as a Non-Designated Heritage Asset (11) and must be retained and preserved for non-residential use. The setting of the parish cemetery (NDH) must also be considered and preserved by ensuring that the development respects its natural boundary and its tranquil and dark character. Investigation using geophysical survey to inform the evaluation of any archaeological potential on the site prior to determination of planning applications on the site will be required.
- 8.5 East Suffolk Council is undertaking work to understand the supply and demand of open spaces and sports facilities across East Suffolk, including Wickham Market. This includes play areas, and it is expected that open space provision on this site will have regard to any needs for play space identified through this work.
- 8.6 As outlined in paragraph 5.9, the Neighbourhood Plan area falls within the remit of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (39). Development on this site will therefore be required to make a financial contribution towards the mitigation of Likely Significant Effects on Habitat Sites. This approach is in accordance with Suffolk Coast RAMS and Policy SCLP10.1 of the Suffolk Coastal Local Plan.
- 8.7 In addition to securing a RAMS contribution, proposals should include provision of well-designed open space. Such provisions can help minimise any predicted increase in recreational pressure on Habitat sites by containing the majority of recreation within and around the development site boundary. Provision of open space, proportionate to the size of the development, should acknowledge that there are some broad design principles that can help to reduce pressure on European sites, which can include the provision of high quality semi natural areas, links to surrounding public rights of way (PRoW) creating circular dog walking routes in line with published best practice guidance, signage/information leaflets to householders to promote these areas for recreation, and dog waste bins. A commitment to the

long term maintenance and management of these provisions would be expected from the developer.

- 8.8 Groundwater and Contamination. The site falls within the Anglian Water Source Protection Zones 1, 2 and 3. Insofar as the land concerned may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with planning applications to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model, and initial assessment of risk), and provide assurance that the risk to the water environment has been fully understood and can be addressed through appropriate measures.

POLICY WICK12: LAND AT OLD SCHOOL FARM

Land at Old School Farm (approximately [4.4] hectares) as identified on the Policies Map) is allocated for residential development. Proposals for up to 85 dwellings will be supported subject to the following criteria:

- a. It provides an appropriate mix of dwelling types and tenures as required by Policy WICK1.**
- b. It provides for affordable housing to meet the requirements of the Suffolk Coastal Local Plan.**
- c. The boundary of physical development, including any access roads/driveways, is to extend no further than the line between the Walnuts Lane junction with the bridleway and the north west corner of the cemetery as shown on the Policy Map. The western edge of the development must be planted with native species hedges and trees to provide a visual screen.**
- d. The Old School Building should be retained and incorporated sensitively into the layout of the site. The layout should ensure that the building has appropriate parking provision for its intended use.**
- e. Vehicular access must be from the High Street (B1438).**
- f. Pedestrian and cycle access links will be provided to the High Street, Walnuts Lane and the playing field/Penny Field.**
- g. Provision of public open space, including formal play space if a need is identified.**
- h. Sensitive design in the area adjacent to the north boundary, Penny field and playing field will be required in order to preserve the character of these open spaces.**
- i. A footpath (public right of way) is to be provided along the southern boundary from the High Street to Walnuts Lane. Sensitive design in the area adjacent to the southern boundary will be required in order to preserve the setting of the Parish Cemetery.**

Land at Simon's Cross

- 8.9 The Simon's Cross allotments have been re-located to Thong Hall Lane nearby, the land that they were sited upon is now available for development. This site was one of two sites which were considered suitable for development in the Site Assessment report (10). This development will generate additional traffic at the choke points within the village, but this increase is assessed to be manageable. SCC Highways advise that access to the site from the B1078 is not suitable and will need to be provided from the existing estate roads. The pedestrian access to the school and the village centre is good, but improvements to the bridleway heading north to Border Cot Lane are required.
- 8.10 Suffolk County Council Highways have advised that in this location, and Broad Road, Broadway, Dallinghoo Road, there are a number of connected drainage issues. Most of the drainage system outfalls to ditches directly to the west of Simons Cross, i.e., where the proposed site is located, and these are not sufficient for the current rainfall. The land around Simon's Cross is generally damp and appropriate drainage design will need to be undertaken.
- 8.11 There is an existing play area on the site, and it is intended that this would be upgraded or replaced as part of the development of this site. Consistent with paragraph 97 of the NPPF (2), play space on the site should be retained unless it is demonstrated that it is surplus to requirements, that the loss would be replaced by equivalent or better provision in terms of quantity and quality or that the benefits of alternative sports and recreation provision outweigh any loss. East Suffolk Council is currently undertaking work to understand the supply and demand of open spaces and sports facilities across East Suffolk, including Wickham Market. This includes play areas, and it is expected that the replacement or upgrading of the play space, or any alternative provision, will have regard to any needs for play space identified through this work.
- 8.12 As outlined in paragraph 5.9, the Neighbourhood Plan area falls within the remit of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (39). Development on this site will therefore be required to make a financial contribution towards the mitigation of Likely Significant Effects on Habitat Sites. This approach is in accordance with Suffolk Coast RAMS and Policy SCLP10.1 of the Suffolk Coastal Local Plan.
- 8.13 Groundwater and Contamination. The site falls within the Anglian Water Source Protection Zones 1, 2 and 3. Insofar as the land concerned may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with planning applications to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model, and initial assessment of risk), and provide assurance that the risk to the water environment has been fully understood and can be addressed through appropriate measures.
- 8.14 This site has cropmarks of a likely enclosure of possibly prehistoric date and, therefore, a trenched archaeological evaluation by condition will be required.

POLICY WICK13: LAND AT SIMON’S CROSS

Land at Simon’s Cross (approximately [1.4] hectares) as identified on the Policies Map is allocated for residential development. Proposals for up to 25 dwellings will be supported subject to the following criteria:

- a. It provides an appropriate mix of dwelling types and tenures.**
- b. It provides for affordable housing to meet the requirements of the Suffolk Coastal Local Plan. This may be secured via agreement with the registered provider in order to secure the identified site access requirements.**
- c. Appropriate vehicular access is to be provided from Simons Cross estate between houses 101 and 103 or between houses 57 and 59 which will require re-provisioning of the existing garages.**
- d. The vehicular crossing of the bridleway will be to a high-quality design, in terms of safety and aesthetics.**
- e. The layout of the site should respect the amenities of the existing houses to the immediate east in Simon’s Cross.**
- f. Replacement or upgrading of existing play space on the site. Any proposals involving the loss of any existing play space will need to demonstrate that such provision is surplus to requirements, that the loss would be replaced by equivalent or better provision in terms of quantity and quality or that the benefits of alternative sports and recreation provision outweigh any loss.**
- g. Pedestrian and cycle access links will be made to the Sports field and to the new allotment site, and also to Little Lane adjacent to 57 and 59 Simon’s Cross.**
- h. Appropriate drainage design will need to be carried out in order to address known local drainage issues.**

8.15 The former draft Neighbourhood Plan Policy related to the relocation of the Simons Cross Allotments to a new site on Thong Hall Road. This has now been completed resulting in WICK14 being removed from the current Neighbourhood Plan. However, there are two outstanding criteria from the policy (b and c) elements of which need to be actioned. These have been included in the Community Actions in Table 9.1.

9. ACTIONS AND INVESTMENT PRIORITIES

- 9.1 There are a number of matters raised through the development of the Neighbourhood Plan which are not best served through a policy in the Plan. Such matters are mainly issues which require an action plan and, in many cases, funding. In this regard, new development within the Neighbourhood Plan area will make contributions through the Community Infrastructure Levy (CIL), 25% of which will come directly to the Parish Council to spend on addressing the needs arising from growth. In addition, CIL funding secured more generally from development across the district can be bid for by the Parish Council.
- 9.2 The spending of District CIL will be based upon the principles outlined in East Suffolk District Council's CIL spending strategy. Infrastructure priorities have therefore been categorised as either critical, essential, or desirable. The Infrastructure Delivery Framework in the Suffolk Coastal Local Plan (Appendix B) (4) defines this as follows:

Critical infrastructure is infrastructure that is needed to unlock development sites allocated in the Local Plan (i.e., without the infrastructure the development cannot physically take place).

Essential infrastructure is the infrastructure that is necessary to support and mitigate development and ensures policy objectives of the Local Plan (or in this case, Neighbourhood Plan) are met. Development could take place without this infrastructure, but its sustainability would be undermined.

Desirable infrastructure is infrastructure that could support development in the Local Plan (or in this case, Neighbourhood Plan) and make it more sustainable and help deliver other place-making objectives. However, development planned in the Local Plan could take place sustainably without it.

- 9.3 The following items have been identified as investment priorities:

Critical Infrastructure:

- Nil

Essential Infrastructure:

- Improvement in traffic management and pedestrian safety throughout the village as identified by the Traffic and Parking Group following evidence- based research and public consultation.
- Additional floorspace and enhancements at Wickham Market Medical Centre.
- Improvements to dental provision.
- Potential phosphate treatment at Wickham Market water recycling centre
- Early Years setting in Wickham Market Ward

Desirable Infrastructure:

- Improvements and modernisation of the Village Hall.
- Improvements to existing play and youth facilities.
- Creation of community Green Spaces and Woodland.
- Improvements to On-Street Car Parking
- Creation of Cycleways.
- Wickham Market Library enhancement
- Provision of a long stay public car park
- Maintain and improve Parish Council leased assets such as Simon’s Cross Playing fields and the Simon’s Cross and Glebe Allotments

9.4 As these priorities are either addressed or they change, this list will be updated in consultation with the community. The Parish Council are committed to producing a Parish Infrastructure Investment Plan which will allow for a level of priority to be given to different projects.

Community Actions

9.5 A consolidated list of community actions that have been identified are shown in the following Table 9.1:

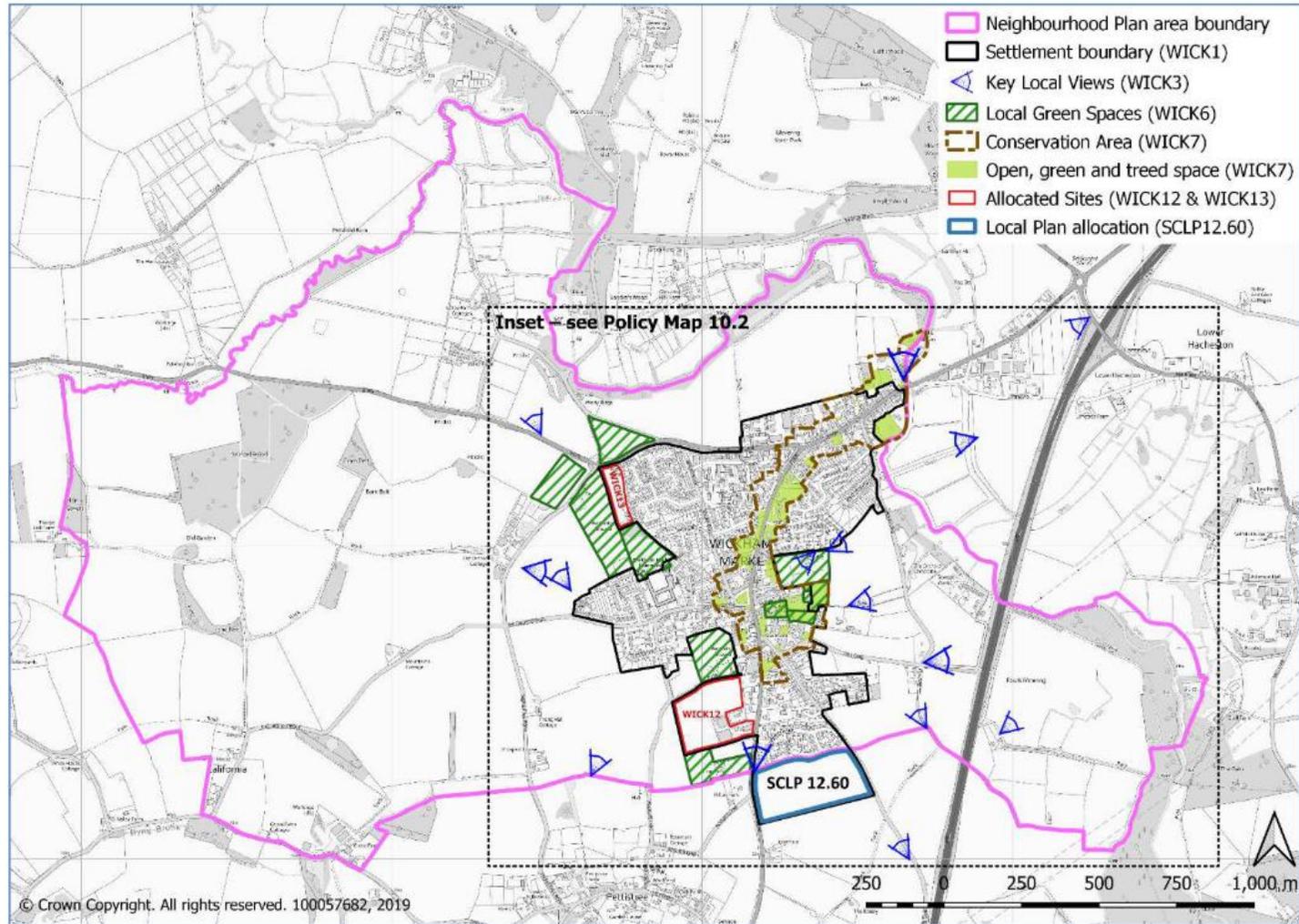
Table 9.1: Community actions

ID	Issue	Action	Lead party
1	Medical provision – the need to provide additional medical floorspace	Work with the Clinical Commissioning Group to identify possible options.	Clinical Commissioning Group
2	Dental care provision – the need to provide additional dental care capacity	Work with the local Dental Practice to identify possible options for increasing capacity.	Wickham Market Parish Council
3	Better cycleways needed	Create cycleways to allow cycle access to all the key village facilities and to the Train Station in Campsea Ashe.	Wickham Market Parish Council working with developers and other Parishes.
4	Support needed for Village Hall modernisation programme	Work with and support the Village Hall Modernisation Steering Group	Village Hall Modernisation Steering Group
5	Support needed for The George Community Pub	Work with and support the George Management Committee to assist in the delivery of this project.	The George Management Committee
6	Long stay car park capacity is needed for businesses and retail centre	To secure adequate and affordable long stay car parking	Wickham Market Parish Council
7	Library enhancement	To find ways to make the Wickham Market library capable of serving a greater number of residents.	Suffolk's Libraries IPS Limited
8	Provision and enhancement of Community Green Spaces	Secure the provision of Community Green Space and ensure it is managed to give the greatest benefit to residents	Wickham Market Parish Council
9	Improving Youth and Play facilities	Continue to improve the Youth and Play facilities	Parish Council and various youth and sports clubs within the village
10	Conservation Area	Request that ESC review the Conservation Area boundary with the objective of expanding it to include notable buildings that are currently outside the Conservation Area	ESC following Parish Council request.
11	Proposed improvements to traffic, parking and pedestrian safety (see list in section 7.14)	To implement the proposed improvements as detailed in Section 7.14 and secure funding them through CIL and other means	Wickham Market Parish Council
12	Simons Cross Allotments	Provision of pedestrian access and boundary planting	Wickham Market Parish Council
13	Additional car parking is required for Village Hall Playing Field	To consider the creation of parking between bowls club and coop.	Wickham Market Parish Council

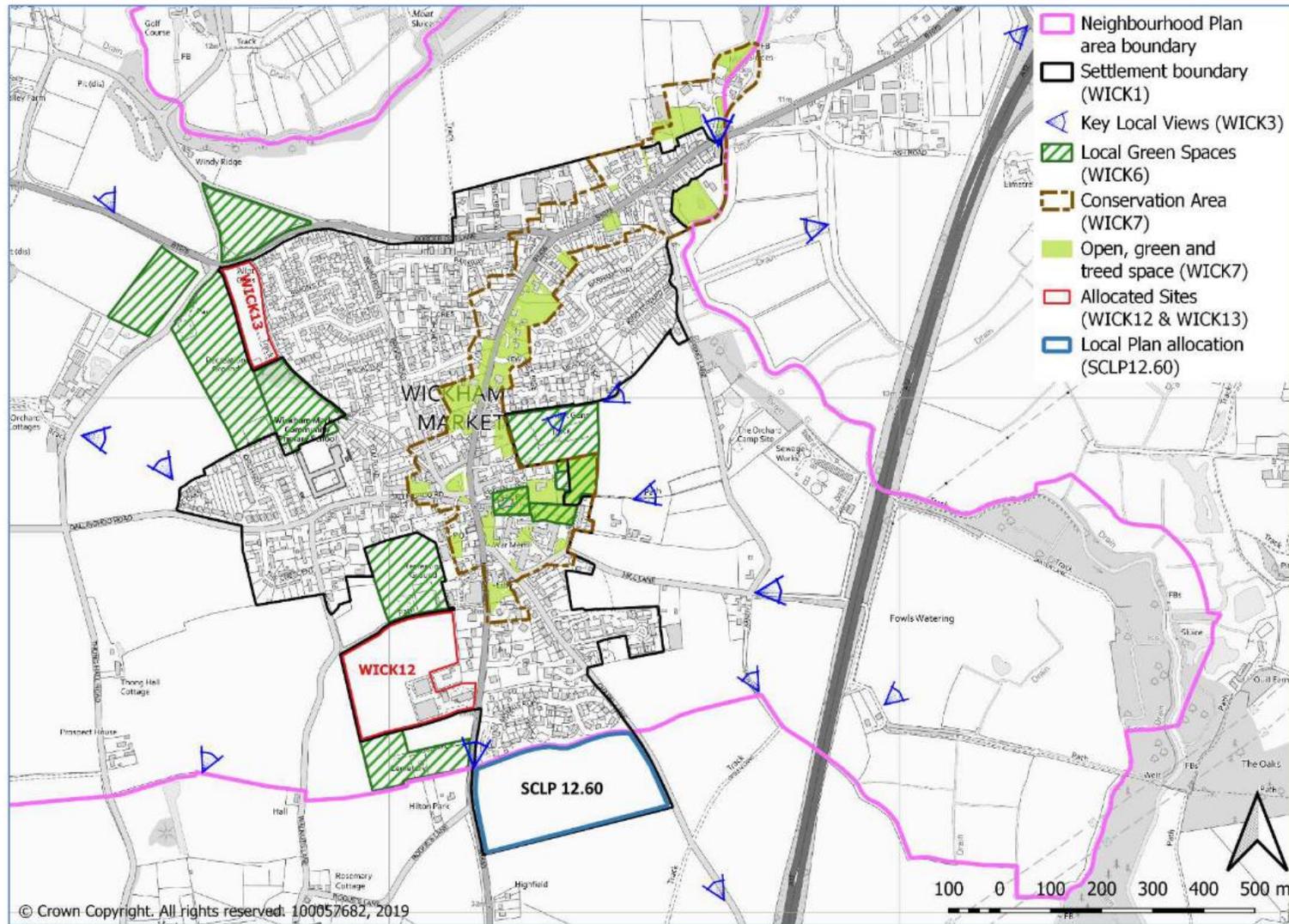
10. POLICIES MAPS

Policy Map 10.1 – Overview

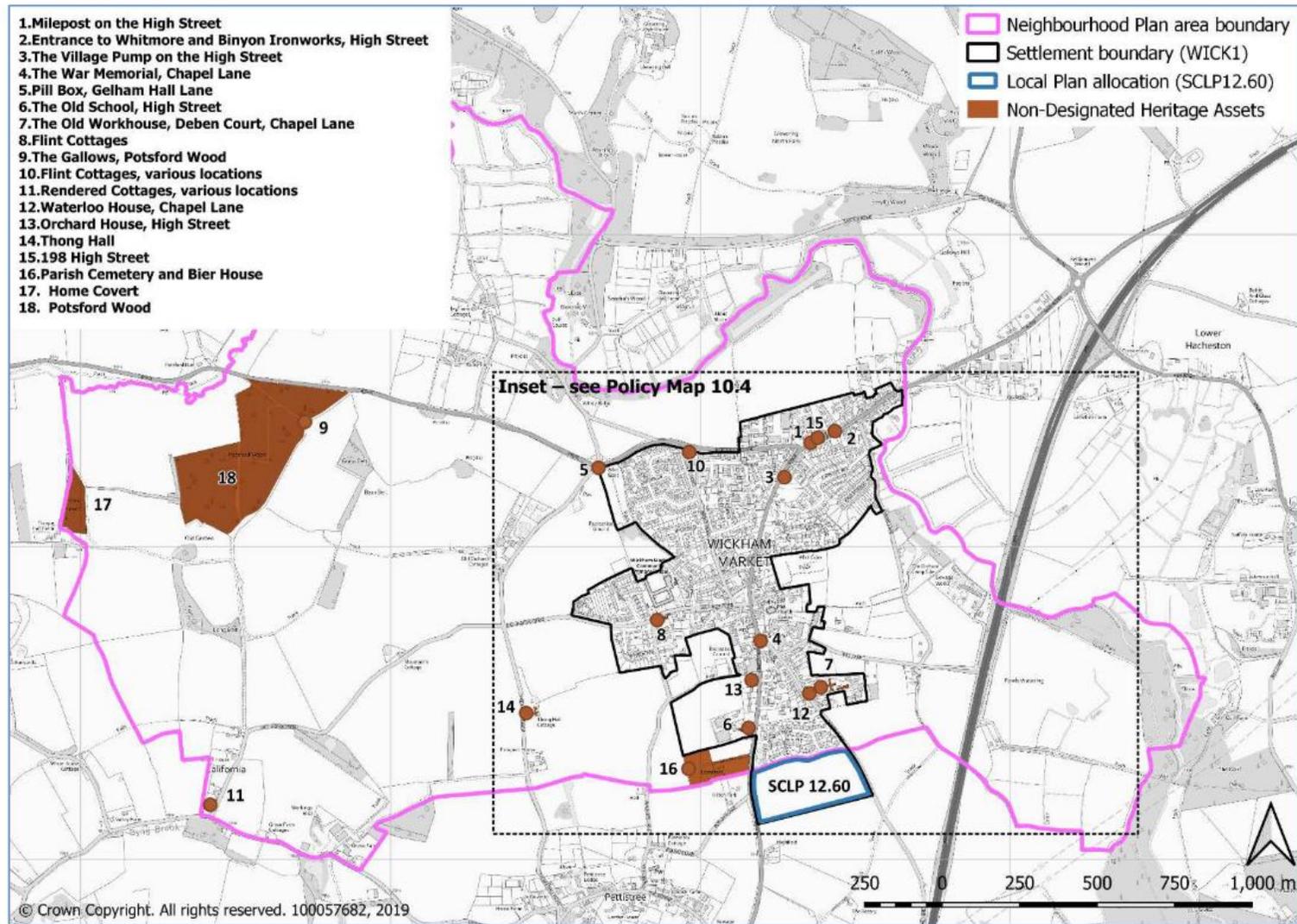
(Also refer to Local Plan policies map for the District Centre and Riverside Industrial Estate Boundaries)



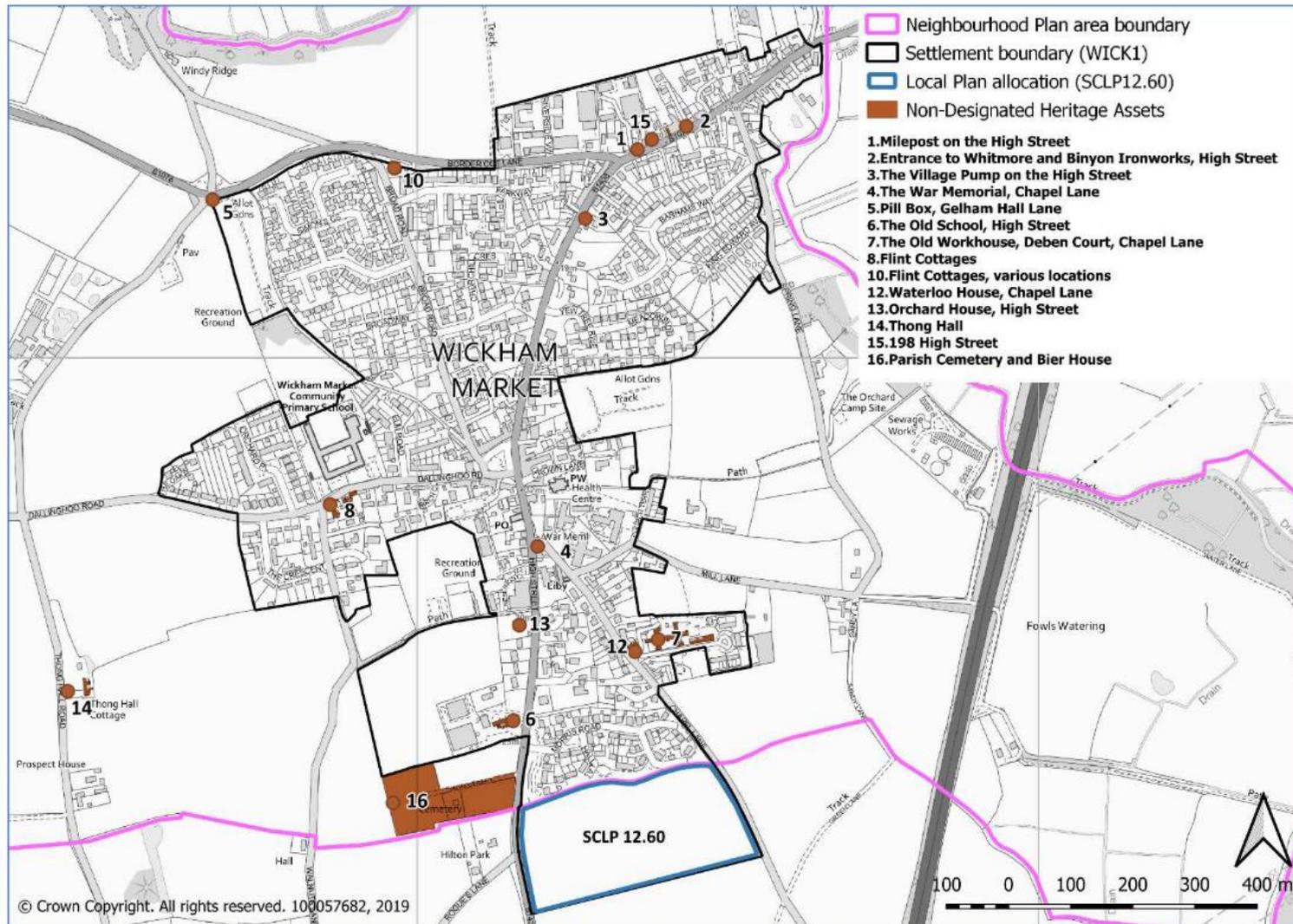
Policy Map 10.2 - Overview Insert



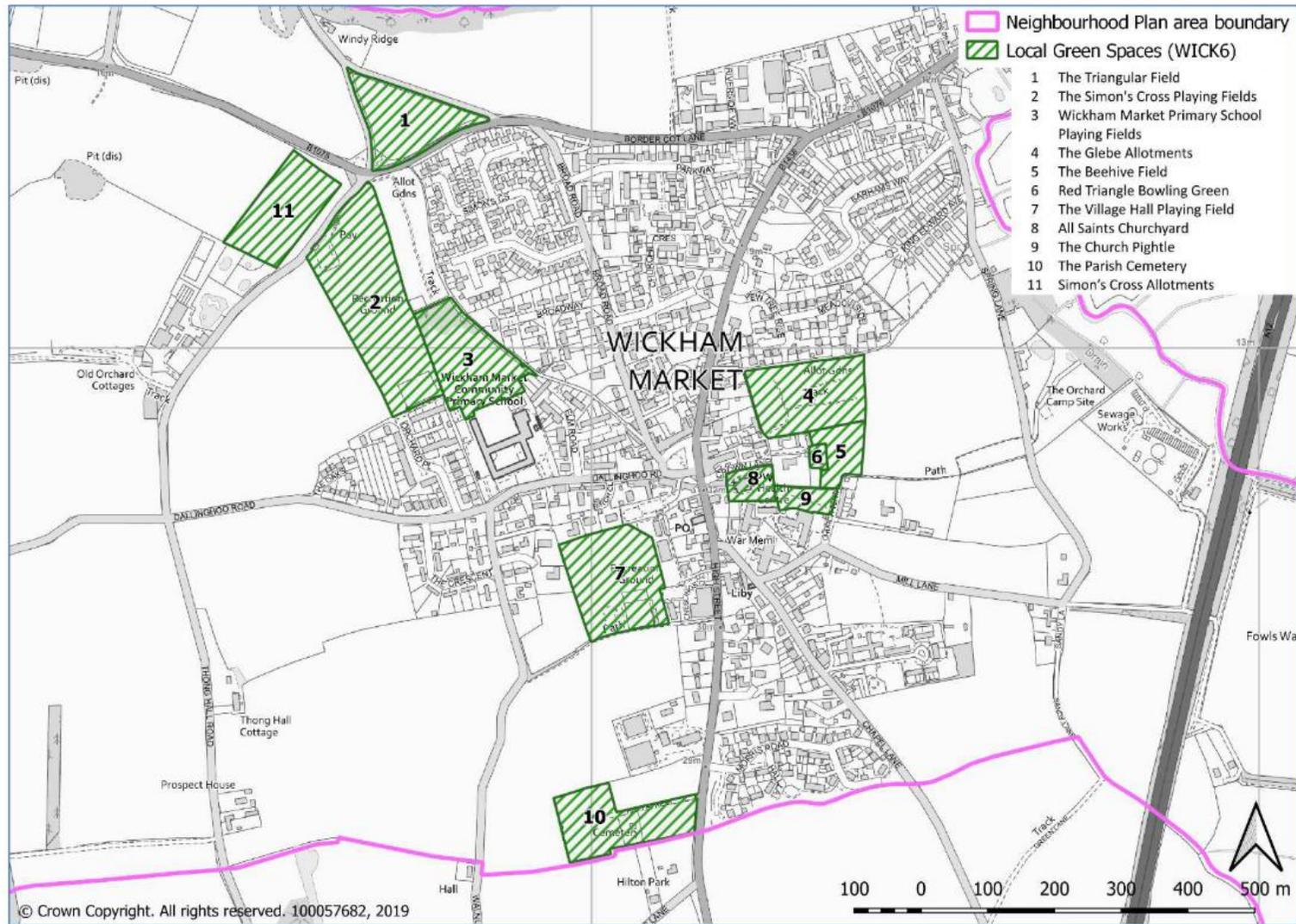
Policy Map 10.3 - Non-Designated Heritage Assets



Policy Map 10.4 - Non-Designated Heritage Assets insert



Policy Map 10.5 – Local Green Spaces



11. BIBLIOGRAPHY

All documents below are available on the WMNP web site at www.wickhammarketnp.org or from other online sources as specified.

1. **WMNP Team.** *Wickham Market Neighbourhood Plan Web Site.* [Online] <https://www.wickhammarketnp.org>.
2. **Ministry of Housing, Communities & Local Government.** National Planning Policy Framework. [Online] July 2021. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.
3. **East Suffolk Council.** Site Allocations and Area Specific Policies Development Plan. [Online] 2017. <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Site-Allocations-and-Area-Specific-Policies/Adopted-Version-Sites-DPD-January-2017.pdf>.
4. —. Suffolk Coastal Local Plan. [Online] 2020. <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>.
5. **AECOM.** Housing Needs Assessment. [Online] 2016. <https://www.wickhammarketnp.org/documents.html>.
6. —. Heritage and Character Assessment. [Online] 2017. <https://www.wickhammarketnp.org/documents.html>.
7. **CMLI., Lucy Batchelor-Wylam CMLI and Isolde Cutting.** Landscape Character Assessment Part 1. [Online] 2018. <https://www.wickhammarketnp.org/documents.html>.
8. —. Landscape Character Assessment Part 2 - Key Views. [Online] 2018. <https://www.wickhammarketnp.org/documents.html>.
9. —. Landscape Character Assessment Part 3 - Sensitivity Assessment. [Online] 2018. <https://www.wickhammarketnp.org/documents.html>.
10. **AECOM.** Site Assessment Report. [Online] 2018. <https://www.wickhammarketnp.org/documents.html>.
11. **Jenkinson, Richard.** Non Designated Heritage Assets. *WMNP.* [Online] 2021. <https://www.wickhammarketnp.org/documents.html>.
12. **Lewis, Ray.** Local Green Space Assessment. *WMNP.* [Online] October 2021. <https://www.wickhammarketnp.org/documents.html>.
13. **Navigus.** Strategic Environment Assessment Reg 16 Report. [Online] March 2021. <https://www.wickhammarketnp.org/documents/>.
14. **Council, East Suffolk.** Habitats Regulation Assessment - Final Draft. [Online] October 2021. <https://www.wickhammarketnp.org/documents/>.
15. **Navigus.** Basic Conditions Statement. [Online] October 2021. <https://www.wickhammarketnp.org/documents/>.

16. **Jenkinson, Richard.** Consultation Statement. [Online]
<https://wickhammarketnp.org/documents.html>.
17. —. Wickham Market Neighbourhood Plan – Timeline. [Online] 2022.
<https://wickhammarketnp.org/documents/key%20docs/WMPC-NP-2021.10.19-Wickham%20Market%20Neighbourhood%20Plan%20-%20Timeline.pdf>.
18. **East Suffolk Council.** Conservation Area Appraisal. [Online] 2016.
<https://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Conservation-Area-Appraisals/Wickham-Market-Conservation-Area-Appraisal-March-2016.pdf>.
19. **Historic England.** Listed Buildings in Wickham Market. [Online]
<https://historicengland.org.uk/listing/the-list/results/?searchType=NHLE+Simple&search=wickham+market>.
20. **Navigus.** Wickham Market Socio-Economic Assessment. [Online] 2018.
<https://www.wickhammarketnp.org/documents.html>.
21. **Office for National Statistics.** *2011 Census*. 2011.
22. **Hering, George.** Wickham Market Neighborhood Plan Business Survey Initial Findings. *WMNP*. [Online] 2017. <https://wickhammarketnp.org/documents.html>.
23. **Wickham Market Parish Council.** Traffic and Parking Report. [Online] 2014.
<https://www.wickhammarketnp.org/documents.html>.
24. **Lewis, Ray.** Count of Bungalows and Flats in Wickham Market Jan 2017. *WMNP*. [Online] Jan 2017. <https://wickhammarketnp.org/documents.html>.
25. **SZC, EDF Energy.** *Sizewell C Stage 3 Pre-Application Consultation*. Jan 2019.
26. **Hering, George.** Community Groups for Consultation. *WMNP*. [Online] 2016.
<https://www.wickhammarketnp.org/documents.html>.
27. **R Theobald, A Hadley, H Benstead.** Consultation with Children in Wickham Market. *WMNP*. [Online] July 2018. <https://www.wickhammarketnp.org/documents.html>.
28. **Hering, George.** Engagement and Consultation Structure. *WMNP*. [Online] 2016.
<https://www.wickhammarketnp.org/documents.html>.
29. —. Questionnaire Results - A Helicopter View of Local Responses to Consultation. *WMNP*. [Online] 2016. <https://wickhammarketnp.org/documents.html>.
30. —. Questionnaire Results - You told us. *WMNP*. [Online] 2016.
<https://www.wickhammarketnp.org/documents.html>.
31. **WMNP.** Communities Come First. [Online] 2018.
<https://www.wickhammarketnp.org/documents.html>.

32. **Team, WMNP.** Draft Vision. [Online] 2016.
<https://www.wickhammarketnp.org/documents.html>.
33. **Jenkinson, Richard.** Site Evaluation Criteria. *WMNP*. [Online] 2018.
<https://www.wickhammarketnp.org/documents.html>.
34. **Landscape Architecture and Environment Planning.** Suffolk Coastal Landscape Character Assessment Final Report. [Online] July 2018.
<https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/SCDC-Landscape-Character-Assessment.pdf>.
35. **Ministry of Housing, Communities & Local Government and Department for Transport.** Manual for streets. [Online] 29 March 2007. <https://www.gov.uk/government/publications/manual-for-streets>.
36. **Transport, Department for.** Manual for streets 2. [Online] 29 Sept 2010.
<https://www.gov.uk/government/publications/manual-for-streets-2>.
37. **Andrew Ashcroft, Independent Examiner.** *A report to East Suffolk Council on the Wickham Market Neighbourhood Development Plan. 2023.*
38. **Suffolk County Council.** *Suffolks Nature Strategy*. [Online] 2015.
<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>.
39. **East Suffolk Council.** Habitat mitigation (RAMS). *www.eastsuffolk.gov.uk/*. [Online]
<https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>.
40. **Centre for Sustainable Energy.** Neighbourhood planning in a climate emergency. [Online] 2020.
<https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/renewables/neighbourhood-planning-in-a-climate-emergency-feb-2020.pdf>.
41. **Suffolk Coastal District Council.** Non Designated Heritage Assets Criteria. [Online]
<http://www.wickhammarketnp.org/documents>.
42. **Suffolk County Council.** Parking Guidance. [Online] 2019. <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>.

End of document



FULL COUNCIL

Wednesday, 22 November 2023

Subject	Code of Corporate Governance
Report by	Councillor Caroline Topping Leader of the Council
Supporting Officer	Siobhan Martin Head of Internal Audit siobhan.martin@eastsoffolk.gov.uk
Chief Executive	Chris Bally Chief Executive Officer Chris.Bally@eastsoffolk.gov.uk

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	n/a
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

The Audit and Governance Committee reviewed the refreshed Code of Corporate Governance at its meeting of 11 September 2023 in accordance with the Committee's terms of reference 'To review the Council's corporate governance arrangements against the good governance framework and consider annual governance reports and assurances'.

The Code of Corporate Governance follows the most recent guidance issued by CIPFA/SOLACE 2016 and entitled "Delivering Good Governance in Local Government".

The Committee received report ES/1639 of Councillor Vince Landon-Morris, the Cabinet Member with responsibility for Resources and Value for Money and Councillor Tim Wilson,

the Assistant Cabinet Member for Resources and Value for Money, which detailed the refreshed Code of Corporate Governance.

Minutes of the Audit and Governance Committee held on 11 September 2023:

Committee received report ES/1639 of Councillor Vince Langdon-Morris, Cabinet Member with Responsibility for Resources and Value for Money and Councillor Tim Wilson, Assistant Cabinet Member for Resources and Value for Money.

Councillor Langdon-Morris introduced the report which was an annual report received by the Committee to confirm that the Code of Corporate Governance was up to date, and to inform the Committee of any changes.

The Head of Internal Audit stated that this was a key document for the Council which guided how services were delivered. There had been very little change since last year, beyond the updating of references to other policies and updating some of language. The document was updated throughout the year.

Councillor Specca asked if there had been any changes following governance issues identified by Ernst and Young. The Head of Internal Audit stated this document summarised the principals of good governance, how service areas applied this would be detailed in other documents. The application of these principals influenced the corrective governance actions taken by the Council in relation to governance failings in Housing Services and a report had been received at the Committee's July meeting which summarised governance changes to housing services.

The Head of Internal Audit highlighted the sections in the Code of Corporate Governance which summarised the arrangements in place against each principal.

Councillor Lynch referred to the section for Principle G and asked whether it was correct that the Chief Finance Officer had responsibility for contracts and contract management. The Head of Internal Audit stated that they did not have sole responsibility, but rather supplementary responsibility alongside other Senior Officers and oversight through purchase orders.

The Head of Internal Audit confirmed that governance arrangements were in place for the Council's companies, which followed the principals set down in this code. Separate reports would be brought to the Committee on any specific governance arrangements or concerns.

On the proposal of Councillor Gandy, seconded by Councillor Lynch it was RESOLVED that having commented upon the refreshed Code of Corporate Governance, the Committee recommends to Full Council that it adopts the refreshed Code of Corporate Governance attached at Appendix A to this report.

Options:

No further options have been considered.

Recommendation/s:

That the having commented upon the refreshed Code of Corporate Governance, Full Council adopts the refreshed Code of Corporate Governance attached at Appendix A to this report.

Corporate Impact Assessment

Governance:

The Code of Corporate Governance is a key document, setting out the Council's overarching corporate governance arrangements.

ESC policies and strategies that directly apply to the proposal:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance.

Environmental:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including any that impact on the environment.

Equalities and Diversity:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including any that relate to equalities and diversity.

Financial:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including financial governance.

Human Resources:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including those relating to staff management and the HR function.

ICT:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including technical governance.

Legal:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including any that ensure legal compliance.

The Accounts and Audit Regulations 2015 require the Council prepares an Annual Governance Statement each financial year. The Code of Corporate Governance sets out the framework used to assess corporate governance arrangements within the Annual Governance Statement and is an integral part of the governance review process.

Risk:

The Code of Corporate Governance sets out how all ESC policies and strategies support the Council's good governance, including risk and opportunity management.

External Consultees:	None applicable
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Internal Consultees:	Audit and Governance Committee, Corporate Leadership Team
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected?			
The corporate governance arrangements of the Council are integral to delivering the Council's vision and objectives. All Strategic Plan priorities are supported by this report.			

Background and Justification for Recommendation

1 Background facts	
1.1	Governance is about how the Council ensures that it is doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It comprises the systems and processes, and cultures and values, by which such bodies are directed and controlled and through which they account to, engage with, where appropriate, lead their communities.
1.2	The Council strives to meet the highest standards of corporate governance to help ensure it meets its objectives. Members and officers are responsible for putting in place proper arrangements for the governance of the Council's affairs and the stewardship of the resources at its disposal.

2 Current position	
2.1	The most recent publication providing local authorities with guidance on good governance was "Delivering Good Governance in Local Government" (CIPFA / SOLACE 2016), which built on principles previously set out in the "International Framework: Good Governance in the Public Sector" (CIPFA/IFAC 2014) publication.
2.2	The importance of local authority governance and culture has been highlighted due to a series of high-profile failings and government interventions. A series of recent reports and publications draw attention to the current governance challenges facing all local authorities: <ul style="list-style-type: none"> 2019 Local authority governance (National Audit Office) 2019 Local Government Governance and Accountability (Committee of Public Accounts) 2020 Addressing cultural and governance failings in local authorities: lessons from recent interventions (MHCLG) 2022 Understanding the challenge to local authority governance (CIPFA)
2.3	The UK Government recognizes the responsibility local government has and the impact of intervention if governance failures occur, and is seeking to foster governance, accountability, and transparency, which will also highlight excellence and success. The emphasis on good governance to underpin new open reporting of local government performance is showcased through the creation of the Office for Local Government in July 2023.
2.4	The Code of Corporate Governance sets out how East Suffolk Council applies good governance principles and was last formally refreshed in March 2023.

3 How to address current situation	
3.1	In order to ensure the Annual Governance Statement's annual review of governance arrangements is effective, the Council needs to ensure its governance framework as set out in the refreshed Code of Corporate Governance is up to date and fit for purpose.

4 Reason/s for recommendation

4.1	By reviewing and considering the Code of Corporate Governance in accordance with best practice the Audit and Governance Committee will fulfil its responsibility within its terms of reference.
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Appendices

Appendices:

Appendix A	Code of Corporate Governance – December 2023
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Background reference papers:

None



East Suffolk Council

Code of Corporate Governance

December 2023

1. Introduction

This document sets out how East Suffolk Council intends to apply the principles of corporate governance in the way it operates and conducts its business. It has been developed in accordance with the principles outlined in the framework and guidance notes by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE) “Delivering Good Governance in Local Government” (2016).

In order to demonstrate its approach to good governance, this Council maintains an up to date local Code of Corporate Governance (“the Code”) and prepares an Annual Governance Statement. These two documents together set out respectively the arrangements for ensuring ongoing effectiveness and publicly reporting on compliance with the Council’s governance framework.

2. What is Governance?

The CIPFA / IFAC guidance “International Framework: Good Governance in the Public Sector” (2014) defines governance as follows:

Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.

Governance is about how the Council ensures that it is doing the right things, in the right way, for the right people, in a timely, inclusive, open, honest and accountable manner. It comprises the systems and processes, cultures and values by which the organisation is directed and controlled and through which it is accountable to, engages with, where appropriate, and leads its communities.

Good governance enables the Council to define and pursue its vision more effectively. It leads to improvements in management, performance, stewardship of public money and public engagement and outcomes for individuals and the community. It ensures that appropriate mechanisms for control are in place and that risks and opportunities are managed effectively.

3. Core Principles of Good Governance

East Suffolk Council recognises and adheres to the following core principles taken from the “International Framework: Good Governance in the Public Sector” (CIPFA/IFAC 2014) and the “Delivering Good Governance in Local Government” (CIPFA/SOLACE 2016)

Overarching principles for acting in the public interest:

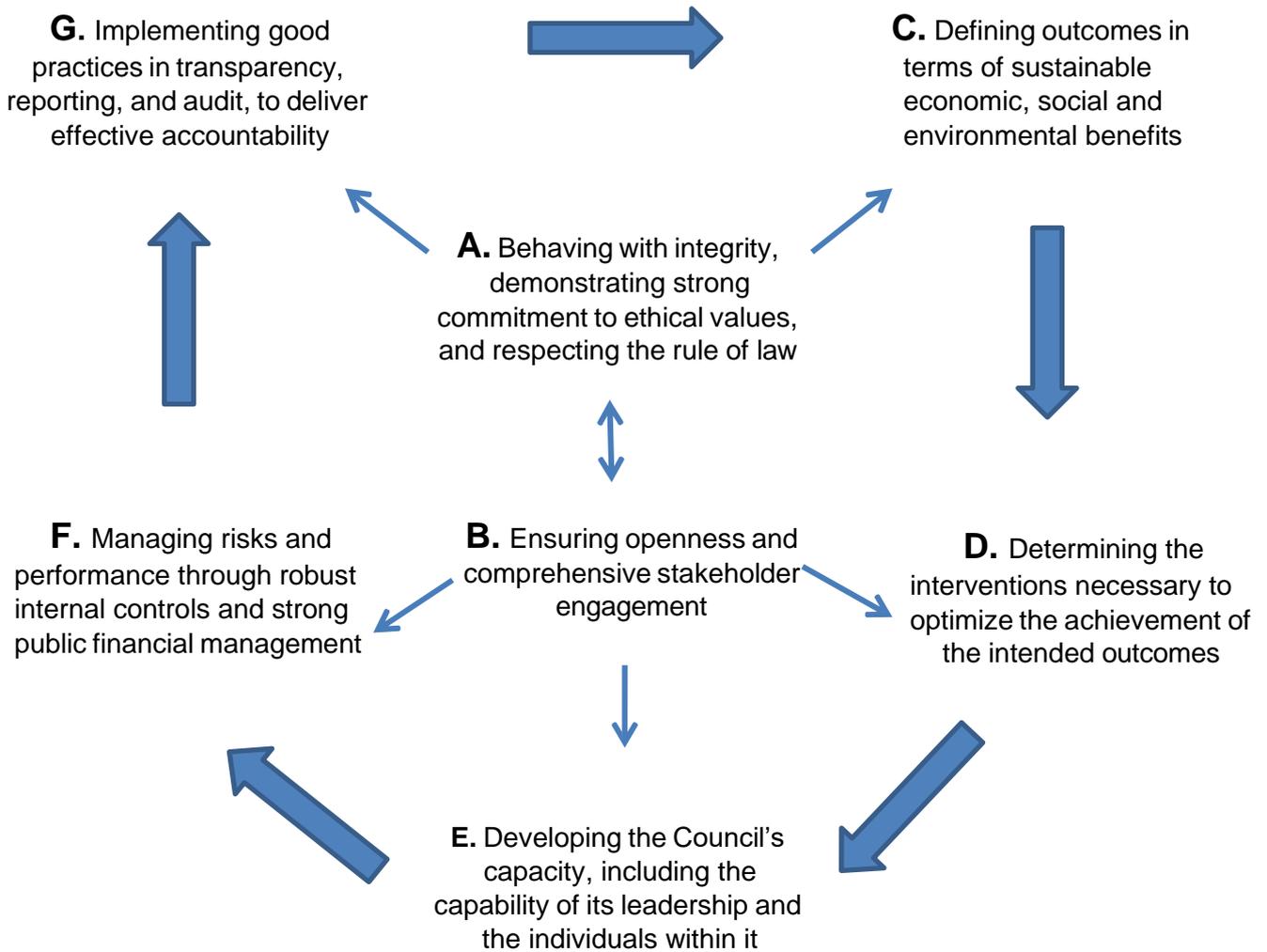
- A. Behaving with integrity, demonstrating strong commitment to ethical values, and respecting rule of law.
- B. Ensuring openness and comprehensive stakeholder engagement.

Additional principles for good public sector governance:

- C. Defining outcomes in terms of sustainable economic, social, and environmental benefits.
- D. Determining the interventions necessary to optimise the achievement of the intended outcomes.
- E. Developing the Council’s capacity, including the capability of its leadership and the individuals within it.

- F. Managing risks and performance through robust internal control and strong public financial management.
- G. Implementing good practices in transparency reporting, and audit to deliver effective accountability.

Principles A and B underpin the governance framework and implementation of principles C to G. The diagram below shows how the principles relate to each other.



4. Applying the Principles of Good Governance

Each of the seven core principles above has a number of sub principles, which in turn, translate into a range of specific policies, behaviours and actions that apply across the various aspects of the Council's business that demonstrate good governance. The tables below (extracted from the CIPFA/SOLACE framework) show how each of these principles should be applied.

Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

Sub Principles	Governance arrangements in place at East Suffolk Council ¹
<p>Behaving with integrity</p> <p>Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation.</p> <p>Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles).</p> <p>Leading by example and using the above standard operating principles or values as a framework for decision making and other actions.</p> <p>Demonstrating, communicating and embedding the standard operating principles or values through appropriate policies and processes which are reviewed on a regular basis to ensure that effectively.</p>	<p>Anti-Bribery Policy and Procedure Anti-Fraud and Corruption Strategy Anti-Money Laundering Policy Assurance Statements Audit & Governance Committee Code of Conduct for employees Constitution Contract Procedure Rules Corporate induction process Customer Feedback Policy Financial management Financial Procedure Rules Head of Paid Service defined responsibilities Internal Audit Charter Member Development Strategy Our Behaviours Our Values People Strategy Professional memberships Register of Councillors’ interest Registers of staff interests, gifts and hospitality Scrutiny Committee Staff Surveys Suffolk Code of conduct for members Whistleblowing Policy</p>
<p>Demonstrating strong commitment to ethical values.</p> <p>Seeking to establish, monitor and maintain the organisation’s ethical standards and performance.</p> <p>Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation’s culture and operation.</p> <p>Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values.</p> <p>Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the organisation.</p>	<p>Code of Conduct for employees Contract Procedure Rules Corporate induction process Financial Procedure Rules Freedom of Information processes Legal services and advice Our Behaviours Our Values Publication Scheme Recruitment Policy Register of Councillors’ interest Registers of staff interests, gifts and hospitality Standard Terms and Conditions for Supplying to the Council Suffolk Code of conduct for members Supplier contracts and Contract Management procedures</p>

¹ Not an exhaustive list; new and refreshed arrangements implemented throughout the year.

<p>Respecting the rule of law.</p> <p>Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations.</p> <p>Creating the conditions to ensure that the statutory officers, other key post holders, and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements.</p> <p>Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders.</p> <p>Dealing with breaches of legal and regulatory provisions effectively.</p> <p>Ensuring corruption and misuse of power are dealt with effectively.</p>	<ul style="list-style-type: none"> Anti-Bribery Policy and Procedure Anti-Fraud and Corruption Strategy Anti-Money Laundering Policy Audit & Governance Committee terms of reference Code of Conduct for employees Compliance and Enforcement Policy Constitution Corporate Leadership Team Customer Feedback Policy Data Protection Policy Golden Triangle Group Legal services and advice Local Planning Enforcement Plan Monitoring Officer defined responsibilities Professional memberships Protocol on Member/Officer relations Recruitment Policy Scrutiny Committee Staff Job descriptions Suffolk Code of conduct for members Whistleblowing Policy
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Principle B: Ensuring openness and comprehensive stakeholder engagement

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Openness</p> <p>Ensuring an open culture through demonstrating, documenting and communicating the organisation’s commitment to openness.</p> <p>Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If this is not the case, a justification for the reasoning for keeping a decision confidential should be provided.</p> <p>Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear.</p> <p>Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/course of action.</p>	<p>Committee meetings open to the public Committee reports, agendas and minutes Constitution Consultation exercises Decision Notices External Audit Annual letters Freedom of Information processes Publication Scheme</p>
<p>Engaging comprehensively with institutional stakeholders</p> <p>Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably.</p> <p>Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively.</p> <p>Ensuring that partnerships are based on trust, a shared commitment to change, a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit.</p>	<p>Our Behaviours Our Values Partnership agreements and collaborative working arrangements People Strategy Planning consultations Supplier contracts and Contract Management procedures</p>

Principle B: Ensuring openness and comprehensive stakeholder engagement

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Engaging with individual citizens and service users effectively.</p> <p>Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes.</p> <p>Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement.</p> <p>Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs.</p> <p>Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account.</p> <p>Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity.</p> <p>Taking account of the impact of decisions on future generations of tax payers and service users.</p>	<p>Committee meetings open to the public Committee reports, agendas and minutes Consultations Council newsletter / magazine Council website and social media Customer Feedback Policy Developers Forum Enabling Communities Strategy Freedom of Information processes Local Plan Neighbourhood Plans Publication Scheme Social Media Policy</p>

Principle C: Defining outcomes in terms of sustainable economic, social, and environmental benefits

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Defining outcomes</p> <p>Having a clear vision, which is an agreed formal statement of the organisation’s purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation’s overall strategy, planning and other decisions.</p> <p>Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer.</p> <p>Delivering defined outcomes on a sustainable basis within the resources that will be available.</p> <p>Identifying and managing risks to the achievement of outcomes.</p> <p>Managing service users’ expectations effectively with regard to determining priorities and making the best use of the resources available.</p>	<p>Committee reports, agendas, and minutes</p> <p>Corporate performance management framework</p> <p>ESC Risk Registers</p> <p>Medium Term Financial Strategy</p> <p>Performance Reports</p> <p>Risk and Opportunities Management Strategy</p> <p>Risk management process</p> <p>Strategic Plan (2020-2024)</p>
<p>Sustainable economic, social and environmental benefits</p> <p>Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decision about service provision.</p> <p>Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation’s intended outcomes and short-term factors such as the political cycle or financial constraints.</p> <p>Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs.</p> <p>Ensuring fair access to services.</p>	<p>Asset Management Strategy 2019-24</p> <p>Budget process</p> <p>Business case appraisal process</p> <p>Capital Programme</p> <p>Capital Strategy</p> <p>Committee reports, agendas and minutes</p> <p>Contaminated Land Strategy</p> <p>Digital Strategy</p> <p>East Suffolk Economic Strategy 2022-27</p> <p>Economic Growth Plan 2018-2023</p> <p>Efficiency Plan</p> <p>Enabling Communities Strategy</p> <p>Environmental Policy</p> <p>Equality & Diversity Policy</p> <p>ESC Risk Registers</p> <p>Financial Procedure Rules</p> <p>Housing Asset Management Strategy</p> <p>Housing Development Strategy</p> <p>Housing Strategy 2017-2023</p> <p>Local Plan</p> <p>Medium Term Financial Strategy</p> <p>Modern Slavery and Human Trafficking Statement</p> <p>Private Sector Housing Strategy</p> <p>Risk and Opportunities Management Strategy</p> <p>Risk management process</p> <p>Safeguarding Policy</p>

Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Determining interventions</p> <p>Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided.</p> <p>Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts.</p>	<p>Committee reports, agendas and minutes Constitution Customer Feedback Policy Our Values Procurement Strategy Project Management Framework Risk and Opportunities Management Strategy Risk management process Staff Job descriptions</p>
<p>Planning interventions</p> <p>Establishing and implementing robust planning and control cycles that cover strategic and operational plans, priorities and targets.</p> <p>Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered.</p> <p>Considering and monitoring risks facing each partner when working collaboratively, including shared risks.</p> <p>Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances.</p> <p>Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured.</p> <p>Ensuring capacity exists to generate the information required to review service quality regularly.</p> <p>Preparing budgets in accordance with objectives, strategies and the medium-term financial plan.</p> <p>Informing medium and long term resource planning by drawing up realistic estimates of revenue and capital expenditure aimed at developing a sustainable funding strategy.</p>	<p>Budget process Capital Programme Capital Strategy Committee reports, agendas and minutes Constitution Corporate performance management framework Customer Feedback Policy Emergency Response Plan Medium Term Financial Strategy Partnership agreements and collaborative working arrangements Performance Reports Procurement Forward Plan Procurement Strategy Risk and Opportunities Management Strategy Risk management process Strategic Plan (2020-2024) Supplier contracts and Contract Management procedures Workforce development processes</p>

Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Optimising achievement of intended outcomes</p> <p>Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints.</p> <p>Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term.</p> <p>Ensuring the medium term financial strategy sets the context for ongoing decision on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage.</p> <p>Ensuring the achievement of “social value” through service planning and commissioning.</p>	<p>Budget process External Audit Annual letters Medium Term Financial Strategy Procurement Strategy Risk and Opportunities Management Strategy Risk management process Social Value Policy</p>

Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it	
Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Developing the entity's capacity</p> <p>Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness.</p> <p>Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently.</p> <p>Recognising the benefits of partnerships and collaborative working where added value can be achieved.</p> <p>Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources.</p>	<p>Asset Management Strategy 2019-24</p> <p>Assurance Statements</p> <p>Corporate performance management framework</p> <p>Partnership agreements and collaborative working arrangements</p> <p>Performance Reports</p> <p>Supplier contracts and Contract Management procedures</p> <p>Workforce development processes</p>
<p>Developing the capability of the entity's leadership and other individuals.</p> <p>Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained.</p> <p>Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body.</p> <p>Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority.</p> <p>Developing the capabilities of members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risk by:-</p> <ul style="list-style-type: none"> - Ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged. - Ensuring members and offices have the appropriate skills, knowledge resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis. - Ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external. 	<p>Assurance Statements</p> <p>Code of Conduct for employees</p> <p>Committee reports, agendas and minutes</p> <p>Constitution</p> <ul style="list-style-type: none"> - Part 2: Functions and responsibilities (including Scheme of Delegation) - Part 2: Terms of reference for committees <p>Corporate induction process</p> <p>Corporate Leadership Team</p> <p>Customer Feedback Policy</p> <p>Decision Notices</p> <p>External Peer and Specialist reviews</p> <p>H&S: internal policies</p> <p>Health and Safety Officer defined responsibilities</p> <p>Health and Safety Policy</p> <p>Member training and development</p> <p>Performance Management (business) framework</p> <p>Staff employment policies</p> <p>Staff Job descriptions</p> <p>Staff performance (My Conversation)</p> <p>Suffolk Code of conduct for members</p> <p>Workforce development processes</p>

<p>Ensuring that there are structures in place to encourage public participation.</p> <p>Taking steps to consider the leadership’s own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections.</p> <p>Holding staff to account through regular performance reviews which take account of training or development needs.</p> <p>Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing.</p>	
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Principle F: Managing risks and performance through robust internal control and strong public financial management

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Managing Risk</p> <p>Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making.</p> <p>Implementing robust and integrated risk management arrangements and ensuring that they are working effectively.</p> <p>Ensuring that responsibilities for managing individual risks are clearly allocated.</p>	<p>Audit & Governance Committee terms of reference Committee reports, agendas, and minutes Corporate Leadership Team ESC Risk Registers Internal Audit Charter Risk and Opportunities Management Strategy Risk management process</p>
<p>Managing performance</p> <p>Monitoring service delivery effectively including planning, specification, execution and independent post implementation review.</p> <p>Making decisions based on relevant, clear objective analysis and advice pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook.</p> <p>Encouraging effective and constructive challenge and debate on policies and objectives to support balanced and effective decision making.</p> <p>Providing members and senior management with regular reports on service delivery plans on progress towards outcome achievement.</p> <p>Ensuring there is consistency between specification stages (such as budgets) and post implementation reporting (e.g. financial statements).</p>	<p>Committee reports, agendas and minutes Corporate Leadership Team Corporate performance management framework Decision Notices Efficiency Plan External Audit Annual letters Medium Term Financial Strategy Performance Reports Scrutiny Committee terms of reference Statement of Accounts Strategic Plan (2020-2024)</p>

<p>Robust internal control</p> <p>Aligning the risk management strategy and policies on internal control with achieving objectives.</p> <p>Evaluating and monitoring risk management and internal control on a regular basis.</p> <p>Ensuring effective counter fraud and anti-corruption arrangements are in place.</p> <p>Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor.</p> <p>Ensuring an audit committee or equivalent group/function, which is independent of the executive and accountable to the governing body:</p> <ul style="list-style-type: none"> - Provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment - That its recommendations are listened to and acted upon. 	<p>Annual Audit Opinion Anti-Bribery Policy and Procedure Anti-Fraud and Corruption Strategy Anti-Money Laundering Policy Audit & Governance Committee terms of reference Constitution ESC Risk Register Internal Audit Charter Risk and Opportunities Management Strategy Risk management process Risk toolkit Whistleblowing Policy</p>
<p>Managing data</p> <p>Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data.</p> <p>Ensuring effective arrangements are in place and operating effectively, when sharing data with other bodies.</p> <p>Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring.</p>	<p>Data Protection Officer defined responsibilities Data Protection Policy Data Quality and Management Policy Digital Strategy Freedom of Information ICT Acceptable Use Policy ICT Security Policy Information and Records Management Policy Internal Audit Charter Legal services and advice</p>
<p>Strong public financial management</p> <p>Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance.</p> <p>Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls</p>	<p>Budget process Capital Programme Capital Strategy Medium Term Financial Strategy S151 Officer (Chief Finance Officer) defined responsibilities Treasury Management Strategy</p>

Principle G: Implementing good practices in transparency, reporting, and audit to deliver effective accountability

Sub Principles	Governance arrangements in place at East Suffolk Council
<p>Implementing good practice in transparency</p> <p>Writing and communicating reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate.</p> <p>Striking a balance between providing the right amounts of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand.</p>	<p>Communications Team defined responsibilities Officer guidance for completion of report template Publication Scheme Style Guide</p>
<p>Implementing good practices in reporting</p> <p>Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way.</p> <p>Ensuring members and senior management own the results reported.</p> <p>Ensuring robust arrangements for assessing the extent to which the principles contained in the Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement).</p> <p>Ensuring that the Framework is applied to jointly managed or shared service organisations as appropriate.</p> <p>Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations.</p>	<p>Annual Governance Statement Cabinet terms of reference Partnership agreements and collaborative working arrangements Statement of Accounts</p>

<p>Assurance and effective accountability</p> <p>Ensuring that recommendations for corrective action made by external audit are acted upon.</p> <p>Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon.</p> <p>Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations.</p> <p>Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement.</p> <p>Ensuring that when working in partnership, arrangements for accountability are clear and the need for wider public accountability has been recognised and met.</p>	<p>Assurance Statements</p> <p>Audit & Governance Committee terms of reference</p> <p>Corporate Leadership Team ESC Risk Register</p> <p>External Audit Annual letters</p> <p>External Peer and Specialist reviews</p> <p>Internal Audit Charter</p> <p>Partnership agreements and collaborative working arrangements</p> <p>Risk and Opportunities Management Strategy</p> <p>Risk management process</p> <p>S151 Officer (Chief Finance Officer) defined responsibilities</p> <p>Supplier contracts and Contract Management procedures</p>
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5. Ongoing effectiveness and Governance Reporting

Good governance is an ongoing process: integral to demonstrating the Council’s commitment to achieving good governance a continuing cycle of improvement is reported publicly via the Annual Governance Statement.

The Annual Governance Statement is a high-level strategic document that sets out:

- how the effectiveness of governance arrangements has been monitored and evaluated
- how planned outcomes are being achieved
- specific challenges and issues
- future plans for improvements and changes

The Annual Governance Statement is reported publicly via the Committee system and also published on the Council’s website.



FULL COUNCIL
Wednesday, 22 November 2023

Subject	Lowestoft Flood Protection – Transport and Works Act submission Update
Report by	Councillor Kay Yule Cabinet Member with responsibility for Planning and Coastal Management
Report Author(s)	Karen Thomas Head of Coastal Partnership East Karen.thomas@eastsuffolk.gov.uk
Head of Service	Philip Ridley Head of Planning and Coastal Management philip.ridley@eastsuffolk.gov.uk
Director	Nick Khan Strategic Director nick.khan@eastsuffolk.gov.uk

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
Wards Affected:	Harbour & Normanston Gunton & St Margaret's Kirkley & Pakefield Carlton Colville Oulton Broad

Purpose and high-level overview

Purpose of Report:

The purpose of this report, following the consideration of a previous report by Full Council on 15th March 2023 is to:

- Set out for the Council how to comply with section 239 of the Local Government Act 1972 (as applied by section 20 of the Transport and Works Act 1992) and confirm the resolution passed by the Council at the meeting held on 15 March 2023 which approved the submission of the Transport and Works Act Order application on 12 October 2023.
- To update Full Council on the finding and potential delivery timetable for the tidal barrier element of the project and to note the funding shortfall and the dependency on additional funding to be identified to enable this project to progress.

Background:

This report is brought to Full Council to update on the matters set out above following the resolution of Full Council on 15th March 2023. At that meeting it was resolved

1. That Full Council promotes an application to the Secretary of State for the Environment, Food and Rural Affairs for an Order under the Transport and Works Act 1992 (TWAO) to authorise the proposed construction, operation and maintenance of a new tidal barrier with a moveable gate across the channel entrance to Lake Lothing on the seaward side of the Bascule Bridge in Lowestoft, East Suffolk. The Order (if made) would, amongst other things, confer powers on the Council to compulsorily acquire and temporarily use land and to carry out other works and include provisions necessary for the purposes of, or for purposes ancillary to, the construction, operation and maintenance of the proposed tidal barrier; 2. That subject to resolution 1 above, that the Head of Planning and Coastal Management, in consultation with a Cabinet Member who has responsibility of [responsibility for] the coast, take all such steps as may be necessary or expedient to carry the above recommendations into effect, including the legal process required for the Council to apply for and thereafter to promote its application for the Order, please see appendix E for the TWAO legal process/programme required; and 3. That the corporate seal of the Council is affixed to any documents required to be sealed in connection with the application for and subsequent promotion of the Order. 4. That the Head of Planning and Coastal Management, in consultation with a Cabinet Member who has responsibility of [responsibility for] the coast Executive Board, comply and deal with any public local inquiry processes and procedures arising or resulting from the submission of the Application.

The Council formally submitted the Transport and Works Act application for the tidal barrier on the 12 October 2023.

As required by the legislation 30 clear days' notice has been given via Section 239 notices printed in the local press on 20 October 2023 (Appendix D).

The Lowestoft Flood Protection scheme is developing a way forward in managing flood risk to protect residents and businesses from disruption, threat to lives and livelihoods, to

support the economic growth and regeneration of Lowestoft and avoid unnecessary and potentially additional flood risk management recovery costs.

The tidal element of the scheme comprises of tidal flood walls, demountable defences and a 40m tidal barrier in the form of mitre gates seaward of the Bascule Bridge.

The tidal walls and demountable defence have been completed in October 2023. The tidal barrier is the final phase of the scheme and will enable the navigation channel from the sea to Lake Lothing to be closed in the event of a tidal surge. The tidal barrier will be the only one of its kind to be constructed in a working channel with no possible diversion. Given the risk to livelihoods, economic growth and the regeneration of Lowestoft, the Town cannot remain undefended from the flooding.

The town has become increasingly vulnerable to flooding from all sources. Heavy rainfall events led to significant fluvial and pluvial flooding in 2015 and flooded 33 homes in the Aldwyck Way and Velda Close area of the town. The 2013 tidal surge flooded 158 residential and 233 commercial properties in Lowestoft and Oulton Broad. Key transportation links such as the railway and A47 also flooded, impacting on flood response, recovery and clean up.

Currently 221 residential and 373 commercial properties are at risk of tidal flooding in addition to a number of locations earmarked for future development within the Lowestoft Local Plan. Following the installation of the barrier in combination with previous phases of work, the scheme will ensure that homes and businesses are better protected from the risk of tidal flooding.

The Lowestoft Economic Footprint and Impact Report was revised in 2022 (Appendix F) to consider the wider impacts of flooding on housing and the local Lowestoft economy along with the economic growth benefits that tidal flood protection would provide.

The study found that the future economic footprint of the area could support 12,000 direct jobs which could generate £641m of annual GVA, increasing to 15,600 Jobs and £833m GVA per year when indirect and induced benefits are considered.

Members should note that the delivery of the barrier will, in addition to protecting people, homes and businesses , provide a catalyst for further investment in the area by providing flooding protection to a 1-200 year level. Officers are also engaging with officials across a number of Government departments to promote the opportunity the barrier presents to the town to achieve national objectives in respect of Net Zero and Levelling Up, as well as delivering on many aspects of the Strategic Plan.

Lowestoft is now central in the wider Government agenda for Energy Resilience - notably offshore wind - a key component of national and international ambitions to reduce carbon and impacts of climate change.

Outline Business Case:

In 2018, an Outline Business Case (OBC) (Appendix C) for the construction of the tidal walls was presented to the Environment Agency (EA) for technical assurance, which was given. A further OBC was also provided to the EA for the construction of the tidal barrier, which highlighted the need for a change from the initial 28m tidal barrier to the necessary 40m

tidal barrier. This reflects the requirement for a safe navigation and longer-term impact from vessels on the operation of the Port.

Transport Works Act Order:

In addition to financial and technical approval of the OBC, the tidal barrier requires a ¹ TWAO to enable the Council to have the appropriate powers to access land to build and then to maintain the tidal barrier. It also grants the Council the necessary powers to alter navigation permanently.

- Section 239 of the Local Government Act 1972 confers on any local authority the power to promote or oppose local or personal Bills. This power is extended to TWAOs, by virtue of section 20 of the Transport and Works Act 1992.
- As part of the legal requirements contained in these provisions, a local authority applying for a TWAO under the Transport and Works Act 1992 must seek authority from its members to apply for the TWAO and secure a vote from at least half of the membership to do so. The Council considered this on 15 March 2023 and resolved to submit the Application. The Application was submitted on 12 October 2023.
- Following submission of an application for a TWAO, it is also a legal requirement under the Local Government Act 1972 and Transport and Works Act 1992 that the local authority that has submitted the TWAO application should confirm the resolution to apply for it by, again, securing a vote from at least half its membership to do so.
- The need for this additional resolution is merely a procedural matter and for the Council to confirm its resolution to submit the Application. Once confirmed, any matters relating to the detail of the Application and its merits can be considered through the normal channels and the public inquiry.

What is a ²Transport Works Act Order?

The TWAO is a statutory instrument “made” by the relevant Secretary of State, in this case the Secretary for the Environment, Food and Rural Affairs.

The TWAO grants “statutory authority” to construct, operate and maintain works, including powers to acquire land and interests in land.

TWAOs are routinely employed for rail and urban transit schemes but are also used in relation to a number of recent flood defence schemes. A TWAO applies when you are permanently altering navigation. For further information see Appendix A.

What powers are included in the TWAO?

- Construction of works;
- Compulsory purchase of land – acquisition of rights permanent or temporary;
- Temporary use of land;
- Interference with highways;
- Interference with navigation – protection of those who use the water;

¹ 1992 c.42

² 1992 c.42

- Powers of operation;
- Protective provisions;
- Repeals and disapplications.

How does a TWAO compare to the planning process?

- Scope of TWAO is far wider (e.g. CPO and operational powers);
- All applications are determined by the Secretary of State;
- Financial circumstances of applicant or likelihood of funding are a key consideration;
- Usually 5 years to implement (rather than 3 years);
- Applicant proposes ‘conditions’ to be imposed;
- Scope of consent is usually more flexible.

Recommendations:

Full Council resolve that:

That the resolution for the promotion by East Suffolk Council (the “Council”) for an application to the Secretary of State for Environment, Food and Rural Affairs for the Lowestoft Tidal Barrier Order, which is to be made under the Transport and Works Act 1992, was duly submitted to the Secretary of State for Environment, Food and Rural Affairs on 12 October 2023 in accordance with the resolution of this Council passed at a meeting held on Wednesday 15 March 2023, and is, by this resolution, confirmed.

Corporate Impact Assessment

Governance:

The Lowestoft Flood Protection scheme has a comprehensive governance structure in place, which consists of Project Board, Project Executive Group, Project Delivery Group, Strategic Steering Group and Key Stakeholder Group.

ESC policies and strategies that directly apply to the proposal:

- East Suffolk Council Constitution
- East Suffolk Strategic Plan
- East Suffolk Economic Growth Plan
- East Suffolk Council – Waveney Local Plan 2019

Environmental:

A full Environmental Impact Assessment has been completed and submitted as part the TWAO application. This assesses potential impacts and mitigation measures for the tidal barrier design. The Environmental Statement is appendix B to this report.

Equalities and Diversity:

An equality impact assessment has been undertaken for the scheme as a whole. The tidal barrier element specifically has no impact. In the case of relative deprivation and socio-economic disadvantage the recommended option will have a positive impact since its focus is to enable inclusive growth and enhance community development.

Financial costs relating to the TWAO:

The cost of delivering the barrier is estimated to be £199.6m with allocated funds of £75.6m leaving a shortfall of £124m. Officers, with the support of the Board (including Peter Aldous MP) are actively pursuing and lobbying for the additional funds given the importance of the project to the future of the town. However, if funding cannot be secured to address the shortfall the Council will have to either stall or completely stop the project as it is costing money to progress with the TWAO. The position on funding will be resolved (either way) in the coming weeks.

Human Resources:

Additional resources required by the project to progress to construction would be an additional Project Manager and Project Co-ordinator, these posts are subject to the successful award of additional funding.

ICT:

No impacts

Legal:

Ongoing legal agreement discussions with key landowners.

³Transport Works Act Order submission will involve significant legal support including counsel if the project is to go to Public Inquiry.

External Consultees:	Associated British Ports (ABP), all affected landowners, tenants and businesses, statutory stakeholders including Environment Agency and publics.
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P05	Support and deliver infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being, and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input checked="" type="checkbox"/>

³ 1992 c.42

P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education, and influence	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>

How does this proposal support the priorities selected?

Growing our economy: The Lowestoft Economic Footprint and Impact Report was revised in 2022 (Appendix F) to consider the wider impacts of flooding on the local Lowestoft economy and the economic growth benefits that tidal flood protection would provide.

The study found that the current economic footprint of project benefit area is estimated to provide 6,400 direct jobs and generates £342m of annual GVA. When indirect and induced benefits are included, this increases to 8,300 jobs and £443m GVA per year. Although the indirect and induced effects are not necessarily located in tidal flood plain area, they depend on it – such as businesses supplying the renewable energy sector operations. The study found that the future economic footprint of the area could support 12,000 direct jobs which could generate £641m of annual GVA, increasing to 15,600 Jobs and £833m GVA per year when indirect and induced benefits are considered.

Although these wider national economic benefits are not necessarily located in Lowestoft, they depend on it – such as businesses supporting offshore renewable energy sector operations.

Enabling our communities: By significantly reducing flood risk across the area to infrastructure and important public facilities, the scheme will address a key risk to the community at the individual and systemic level. It will protect and prevent disruption to key assets and infrastructure the communities rely on (such as schools, GP surgeries and transport infrastructure) plus significantly reduce the pre- and post-event mental health impacts of flooding in an area of multiple deprivation. The community and schools have been involved throughout the process and maximising social value is a core component of the scheme. Artwork created by local students has been incorporated into the design of the tidal flood walls.

Remaining financially sustainable: The scheme will provide flood resilience to Lowestoft and offer certainty to existing businesses and new developers that Lowestoft is a great place to invest. The project will help protect business rate income generated in the area plus help unlock the generation of new income by enabling growth and development by reducing the cost of site-level flood mitigation on key sites in the town.

Delivering digital transformation: The project will protect infrastructure that will be part of the Lowestoft Full Fibre project, plus broader IT infrastructure assets.

Caring for our environment: The project will protect a range of environmental and landscape benefits within the town that make up the existing programme of improvements to public realm. Lowestoft is the gateway to The Broads and there is a thriving tourism and boating industry connected to this, which needs protection and potentially enhancing. ‘Leathes Ham’ nature reserve in central Lowestoft will also be protected from tidal inundation plus avoid the significant pollution resulting from a major tidal storm surge entering the urban zone.

Background and Justification for Recommendation

1 Background facts	
1.1	During the December 2013 tidal surge over 158 homes and 233 commercial properties were flooded. In addition to this road and rail networks were significantly disrupted.
1.2	The Lowestoft Flood Protection scheme was already in the early stages of development prior to the tidal surge.
1.3	The scheme is developing a way forward to manage the flood risk to Lowestoft from all sources of flooding and to allow the economic growth and regeneration by introducing measures to protect existing residential and commercial properties. This has been confirmed as underpinning the Lowestoft Transport and Infrastructure Plan.
1.4	The extent of the project at risk of tidal flooding encompasses the area from the outer harbour entrance through Lake Lothing to the A1117 Bridge Road crossing and Mutford Lock, which forms the boundary with Oulton Broad. This will include the ongoing construction of tidal floodwalls and the future construction of a tidal barrier to provide protection from tidal flooding to the town of Lowestoft.
1.5	Phase 1 Works were fully funded and received technical assurance from the EA’s Large Project Review Group in 2018. This included tidal flood walls, river wall and pumping station and property level protection.
1.6	The tidal barrier forms Phase 2 of the works.
1.7	The expansion of the wind energy sector in Lowestoft, potential support for the delivery of the Sizewell C construction phase and the need to ensure that the Port remains operational during construction, plus the COVID-19 pandemic have impacted upon the scheme’s construction timetable and methodology – resulting in a substantial increase in project costs.
1.8	The tidal barrier delivers significant wider reaching benefits by significantly reducing the risk of flooding to the town centre, A road, development land and infrastructure.
1.9	In June 2021, the project team in conjunction with ABP tested the navigation simulations conclusions and verified through extensive option assessments that the only option available to deliver the scheme objectives was to increase the size of the barrier to 40m. ABP are supportive of the 40m barrier option, and it is critical to meet the needs of the key stakeholder landowners in the project in order to get the ⁴ TWAO approved.

⁴ 1992 c.42

	The review and subsequent discussions with both the Project Executive Group and the Project Board approved the selection of the 40m barrier as the preferred option.
1.10	Construction of the tidal floodwalls was completed in October 2023.

2 Current position

2.1	<p>Current key activities being undertaken on the scheme include:</p> <ul style="list-style-type: none"> - Updated Outline Business Case has been submitted to the Environment Agency and received technical approval. - All floodwall works were completed in October 2023. - Outline design has been reviewed and cost estimate has been updated. - The TWAO was submitted on 12 October 2023. - Discussions with Government Departments are taking place regarding additional funding - final cut off for a funding decision will be November 2023. - Ongoing consultation with key stakeholders, statutory consultees, landowners, tenants, businesses and the community.
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3 Risk relating to the Order application

3.1	<p>It should be noted that the TWAO Application will present an opportunity for consultees to submit representations/objections to the scheme.</p> <p>These are most likely to come from a limited set of stakeholders that fall into the following categories:</p> <ul style="list-style-type: none"> • affected landowners; • persons that object to the proposals to close the channel and/or change navigation; and • persons affected by or objecting to adverse impacts caused by the Project as a whole (e.g., noise, vibration etc). <p>These submissions may be considered at a public inquiry before an Inspector. The Council will be required to justify the powers it is seeking in the Order, by reference to suitable evidence. The decision on the Application is taken by the Secretary of State for the Environment, Food and Rural Affairs. There is a risk that the Application may be refused in whole, or certain elements omitted. In addition, a decision made on an Order could be subject to legal challenge by third parties. The project team and officers have identified key risks to the Application being determined favourably and these are being managed, mitigated through preparation of robust supporting documentation with input from legal, planning, and technical consultants.</p> <p>The deadline for all objections to be submitted to the Secretary of State is 23 November 2023.</p> <p>We have proactively engaged with ABP and the Royal Norfolk and Suffolk Yacht Club thoroughly and are currently in the process of finalising legal agreements.</p>
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Appendix A - Consultation Report and Appendix B - Environmental Statement refer to actions taken to raise awareness of the scheme, to understand concerns, take mitigating action and reduce the risk of objection to the Order application.

4 Reasons for recommendation

- 4.1 Full Council is being asked to resolve, for the purposes of section 239 of the Local Government Act 1972 (as applied by section 20 of the Transport and Works Act 1992), the resolution of the Council that was passed at a meeting of the Council held on 15 March 2023 which approved the submission of the Application on 12 October 2023 for the purpose of section 239 of the Local Government Act 1972 is confirmed by this resolution. It is not committing to the actual construction of the barrier as that will be subject to future reports next year. However, the resolution is a crucial stage in the process formalising, after many years of preparation, how we are seeking the necessary consent to deliver this crucial project for the town.
- 4.2 The main driver for the scheme is to reduce the risk of flooding to people and property in Lowestoft. The December 2013 tidal surge event caused significant damage and disruption to the Lowestoft community and economy and it is considered that without intervention to manage these risks Lowestoft will not be able to develop and will probably go into decline.
- 4.3 Investment to manage tidal flood risk in Lowestoft is supported by the SMP2's policy of hold the line for the coastal frontage. The proposals are compatible with the recommendations of the Gorleston to Lowestoft Coastal Management Strategy.
- 4.4 Lowestoft is a town of multiple deprivation that has become increasingly vulnerable to flooding from all sources for many decades.
- 4.5 At present Lowestoft does not have any formal tidal defences protecting the town and without intervention, it has become increasingly vulnerable to tidal flooding due to climate change. Lowestoft is currently considered to be at risk from the onset of flooding from tide levels with around a 1in5 (20%) to 1in10 (10%) Annual Exceedance Probability (AEP). A 1in200year (0.5% AEP) event (2018) would put approximately 221 residential and 373 commercial properties at risk of tidal flooding in addition to a number of locations earmarked for future development within the Lowestoft Local Plan.
- 4.6 This situation gets significantly worse when the impacts of climate change are considered with the low standard of protection (SoP) restricting the growth potential of the local economy with a 1in200 year (0.5% AEP) SoP being the standard considered by developers and the Local Planning Authorities to enable the majority of new developments.
- 4.7 The December 2013 storm surge event was between a 1in100 (1%) and 1in150 (0.67%) AEP event) and approximately 158 residential and 233 commercial properties were flooded in Lowestoft. The tidal flooding also resulted in the closure of key transportation links including Lowestoft railway station and the A47 through Lowestoft.
- 4.8 To effectively manage risk of flooding from all sources in Lowestoft, East Suffolk Council have developed an integrated Lowestoft Flood Protection scheme. In 2021 we completed the fluvial and pluvial elements of this scheme and in 2018 we began work on tidal defences.

4.9 However, we now need to deliver a 40m tidal barrier to complete the integrated package of works. The lack of defences are continuing to put people and property at risk, suppressing the ability of Lowestoft to develop and grow and are not allowing the deprived areas of the town to “Level Up” as per wider Government outcomes.

4.10 The lack of certainty of tidal flood risk is holding Lowestoft back and allowing social deprivation to remain a key issue for the town. To enable a tidal barrier to be constructed it is essential that a TWAO is obtained. A TWAO allows for changes to navigation and rights of access during construction and for operation and maintenance post construction.

4.11 Additionally, the scheme aims to underpin the wider development of Lowestoft port as a central hub for marine and offshore industry notably supporting an accelerated delivery programme for ABP’s LEEF project and as a marine transport hub for the Sizewell C nuclear power station (national infrastructure project).

Appendices

Appendices:	
Appendix A	Consultation Report
Appendix B	Environment Impact Assessment
Appendix C	Outline Business Case
Appendix D	TWAO s.239 Notice
Appendix E	TWAO Full Process
Appendix F	Lowestoft Economic Footprint and Impact Report
Appendix G	Lowestoft Flood Protection Programme summary

Full TWAO application submitted 12 October 2023, available online at:

<https://www.eastsuffolk.gov.uk/environment/coastal-management/lowestoft-tidal-barrier-twao-application/>

The Lowestoft Tidal Barrier Order

Transport and Works Act 1992

Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006

A5. Consultation Report



October 2023

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Appendices

- Appendix 1. Engagement log
- Appendix 2. Communications and Engagement Plan
- Appendix 3. Equalities Impact Assessment
- Appendix 4. 2016 Consultation materials
- Appendix 5. 2017 Consultation materials
- Appendix 6: 2022 Consultation materials
- Appendix 7: 2023 Consultation materials
- Appendix 8: Virtual Engagement Materials
- Appendix 9: Project Newsletters
- Appendix 10: Press Releases
- Appendix 11: Social Media Log
- Appendix 12: Flood Resilience Assessment Report
- Appendix 13: Engagement on Navigation Simulations
- Appendix 14: Draft Order Consultation Materials (May 2023)

1 INTRODUCTION

- 1.1 East Suffolk Council (**ESC**) is seeking to manage tidal flood risk in Lowestoft, Suffolk. To achieve this, ESC is proposing to build a tidal barrier, which can be raised and lowered, within the Inner Harbour Entrance Channel of Lake Lothing, to the east of the Bascule Bridge together with associated works (together, the **Scheme**). To fully manage tidal flood risk in Lowestoft, the construction of a tidal barrier on its own is not sufficient to manage risk. A series of tidal flood walls and flood gates are under construction around the Outer Harbour and these works are already complete or will be completed by autumn 2023. The locations of these defences are based upon data and evidence from flooding which occurred during the 2013 east coast tidal surge.
- 1.2 ESC is applying to the Secretary of State for the Environment, Food and Rural Affairs (**Defra**) for an Order under the Transport and Works Act 1992 (**TWAO**) and making an associated request for a direction deeming planning permission to be granted for the Scheme, pursuant to section 90(2A) of the Town and Country Planning Act 1990. The purpose of the proposed TWAO and associated deemed planning direction is to authorise the construction, operation and maintenance of the Scheme.

2 PURPOSE OF THIS REPORT

- 2.1 This report is a summary of consultations undertaken by ESC during the development and design of the proposals comprised within the Scheme. It has been prepared pursuant to rule 10(2)(d) of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 (the **2006 Rules**) and is being submitted as part of the TWAO application.
- 2.2 As required by Rule 10(2)(d) of the 2006 Rules, ESC confirms it has consulted with the organisations identified within Schedules 5 and 6 to the 2006 Rules in so far as they may be relevant, having regard to the works comprised within the Scheme. Further details as regards this aspect of the consultation undertaken are provided in **Chapter 13** of this report.
- 2.3 ESC has carried out extensive consultation and engagement throughout the development of the Scheme. Early consultation was undertaken in the wider context of the development of the Lowestoft Flood Risk Management Strategy which, when approved through the Environment Agency's Strategic Outline Business Case approvals process, developed into the Lowestoft Flood Risk Management Project (**LFRMP**). This was the wider strategic approach to the management of pluvial, fluvial and tidal flooding in Lowestoft, of which the Scheme forms a significant and substantial part. Throughout, ESC has sought to provide consultees with the opportunity to inform option selection and the development of the Scheme.
- 2.4 The approach adopted in communications and engagement for the LFRMP and the Scheme has been one of open two-way dialogue, ensuring that those directly and indirectly impacted by the proposed approach were informed about the emerging proposals and able to provide their viewpoint. Feedback received has informed the Scheme's progression throughout.
- 2.5 This report documents the engagement and consultation that has been undertaken by ESC, explains the feedback that has been received and summarises how this feedback has been taken into account during the development of the Scheme.
- 2.6 In May 2023 LFRMP was rebranded and these proposals are now known as Lowestoft Flood Protection (**LFP**). In this report, the term LFRMP will be deployed when describing the proposals as they stood at a date prior to the May 2023 rebrand whereas references beyond May 2023 will generally be made to LFP. The tidal barrier and associated works which are the subject of the TWAO application will either be referred to as the Lowestoft Tidal Barrier or the Scheme.

3 STRUCTURE OF THIS REPORT

3.1 This report and its appendices set out the consultation and engagement undertaken as part of the development of LFP and, more specifically, the development of the Scheme. The remainder of this report is structured as follows:

- **Chapter 4** explains the objectives of the Scheme;
- **Chapter 5** explains the background to the wider LFRMP proposals of which the Scheme forms part;
- **Chapter 6** provides a high-level description of the Scheme;
- **Chapter 7** explains the overall approach taken by ESC in relation to consultation and engagement;
- **Chapters 8, 9 and 10** set out the consultation approaches, methodology and channels for the wider LFRMP proposals;
- **Chapter 11** sets out the consultation which was undertaken more recently and specifically once the Scheme had been defined;
- **Chapter 12** provides a high-level summary of the consultation undertaken in the context of the Environmental Impact Assessment undertaken for the Scheme;
- **Chapter 13** summarises the consultation undertaken with statutory consultees, namely those identified under Rule 13 and those named in Schedules 5 and 6 to the 2006 Rules; and
- **Chapter 14** sets out ESC's intended approach to future consultation and engagement as regards the Scheme

4 SCHEME OBJECTIVES

4.1 The objectives of the Scheme were initially defined early in the development of the LFRMP in 2016 but have evolved as the proposals have progressed through the development and delivery stages.

4.2 The objectives are:

- To reduce the risk to residential and commercial properties from the effects of tidal flooding
- To reduce costs associated with developing and insuring property within areas of Lowestoft susceptible to flooding
- To provide a minimum standard of protection of 0.5% AEP against tidal flooding in 2117 to residential and commercial areas of Lowestoft
- To provide businesses with the confidence to grow and invest in areas of the town which are currently not considered suitable for development (planning) due to the risk of tidal flooding
- To enable the development of key sites through the alleviation of direct flooding and protection of essential infrastructure

5 OVERVIEW OF THE LOWESTOFT FLOOD RISK MANAGEMENT PROJECT

- 5.1 Lowestoft has become increasingly vulnerable to flooding from sea, rivers, and rain over a number of decades. Tidal flooding to 400 homes occurred in the east coast tidal surge of 1953. Tidal flooding happened again in the 2013 tidal surge when 158 residential and 233 commercial properties flooded in Lowestoft and Oulton Broad. The tidal flooding also resulted in the closure of key transportation links including Lowestoft railway station and the A47 through Lowestoft.
- 5.2 Lowestoft is particularly susceptible to flooding from tidal surges due to the small normal tidal range compared to other locations along the east coast of England. Lowestoft has a tidal range of approximately 2m. This is low when compared to locations along the outer Thames and Humber estuaries which have tidal ranges in excess of 5m. A consequence of this low tidal range is that a significant tidal surge (>2m) at Lowestoft could cause flooding at almost any state of the tide. In contrast, at locations with a greater tidal range the timing of the surge event compared to high water has greater influence and reduces the likelihood of flooding from the surge.
- 5.3 In the absence of any formal tidal defences protecting the town, a temporary demountable system is deployed when flood forecasting triggers a surge warning. Without intervention, Lowestoft will become increasingly vulnerable to tidal flooding due to climate change. Lowestoft is currently considered to be at risk from the onset of flooding from tide levels with around a 1in5 (20%) to 1in10 (10%) AEP. This situation is expected to significantly worsen when the impacts of climate change are considered.
- 5.4 The existing level of protection within the town is restricting the growth potential of the local economy. A 1in200 year (0.5% AEP) standard of protection is considered by developers and the Local Planning Authorities to enable the majority of new developments.
- 5.5 To effectively manage the risk of flooding from all sources in Lowestoft, ESC developed the integrated Lowestoft Flood Risk Management Project (**LFRMP**). LFRMP (now known as Lowestoft Flood Protection) is a major strategy to reduce flood risk from pluvial, fluvial and tidal sources to Lowestoft and commenced in 2014. The proposals for the new tidal barrier comprised within the Scheme form a key part of the wider LFRMP strategy to address tidal flood risk, alongside plans to deliver new flood walls around the Outer Harbour area.
- 5.6 In 2021 ESC completed the fluvial and pluvial elements of the LFRMP. The new flood walls were granted planning permission and listed building consent in 2020 and construction works were completed in autumn 2023. The construction of the tidal barrier comprised within the Scheme is required to complete the integrated package of works. The lack of protection from flood risk is suppressing the ability of Lowestoft to develop and grow and preventing deprived areas of the town to “level up” as per wider government outcomes. Tidal flood risk is restricting Lowestoft’s development and means social deprivation remains a key issue for the town.

6 SCHEME OVERVIEW

- 6.1 The Scheme would involve the construction of a new tidal barrier comprising a pair of mitre gates between abutments, across the entrance channel to Lake Lothing and the Inner Harbour of the Port of Lowestoft, approximately 40 metres downstream (east) of the Bascule Bridge. The new tidal barrier would, when in a fully open position, provide a channel width of approximately 40 metres. In addition to the barrier itself, the Scheme would also include the construction of enclosures/buildings for a new electricity substation and associated mechanics in connection with the operation and maintenance of the barrier.
- 6.2 The Scheme also includes permanent fixings to allow the installation of demountable flood defences on the North and South Quays. These defences would provide a continuous defence between the barrier and the adjacent flood walls which are already constructed or due to be completed by autumn 2023. The flood walls do not form part of the Lowestoft Tidal Barrier Scheme TWAO application (save that the proposed Order includes powers to secure permanent rights to inspect, maintain and operate a short length (approximately 35m) of the flood walls at the western extent of Hamilton Road). Operational buildings are also required.
- 6.3 ESC will be the asset owner for the barrier and the other structures constructed as part of the Scheme and will be responsible for its operation and maintenance. In normal conditions the tidal barrier would be held in an open position. It is designed to be operated for tidal flood risk management at the onset of an extreme surge tide. It would also be operated for testing and staff training, and for maintenance purposes.
- 6.4 Full details of the works required to deliver the Scheme are set out in Schedule 1 to the Draft Order (**Application Document A2**) whilst a more detailed description of the Scheme and the works that will be required to construct it can be found in Chapter 6 (*Scheme Description*) of the Environmental Statement (**Application Document A17**).

7 ESC'S APPROACH TO CONSULTATION

- 7.1 Through its approach to consultation, ESC and its LFRMP partners have undertaken effective stakeholder engagement and meaningful consultation with a wide range of interested parties and individuals over several years.
- 7.2 The Transport and Works Act Guide to Procedures (Department for Transport, 2006) clearly identifies the benefits of pre-application consultation and recommends that promoters '*consult thoroughly on their proposals with relevant statutory authorities, with statutory utilities whose services may be affected, and with all other persons likely to be affected by the proposals*'.
- 7.3 ESC fully recognises the importance of maintaining effective channels of communication to enable a two-way flow of information and opinions and appreciates the value that stakeholder feedback can add to its projects. Pre-application consultation has therefore formed an important part of the development of the Scheme, which has been consciously collaborative.
- 7.4 The proposals comprised within the Scheme have been developed through close working between ESC and its partners, the Environment Agency, the New Anglia Local Enterprise Council and Suffolk County Council, with ESC taking views from a range of stakeholders. As part of the formal project governance, the project's Board, Strategic Steering Group and Key Stakeholder Group have all played an important role in developing the Scheme. The project Board includes ESC, Suffolk County Council, the Environment Agency and the New Anglia Local Enterprise Partnership. The Strategic Steering Group's membership includes statutory and non-statutory partners such as the Associated British Ports (**ABP**), Suffolk and Waveney Chamber of Commerce, Anglian Water and Natural England. The Key Stakeholder Group is made up of those representing community and business interests such as Lowestoft Vision and Lowestoft Rising as well as key landowners and land agents.
- 7.5 Throughout that development, information has been openly shared, and discussion has been welcomed. In this way, the overall direction and design of the Scheme has been formulated collaboratively. Consultation has also helped shape the evolving design, in response to comments raised.
- 7.6 **Chapter 8** of this report provides an overview of the main phases of consultation that have been undertaken and these are explained further in this report. However, ESC has taken every opportunity to engage with people, beyond the formal consultation rounds. Engagement with internal ESC teams such as planning, major infrastructure projects, economic regeneration and communities has provided important opportunities to embed the Scheme's benefits into plans and strategies such as the Local Plan, Think Lowestoft, an initiative leading to wider development of the area, and plans linking to the provision of green energy.
- 7.7 ESC has adopted various approaches to consultation and engagement, including:
- Partnership working and close engagement with key stakeholders to jointly develop the Scheme proposals and consider issues arising

- Consultation with key stakeholders and the wider public to gather feedback on specific proposals
- Wider sharing of information through mailshots, emails and newsletters sent to an established stakeholder database, updates of a virtual engagement room with links shared on social media and press releases
- The use of social, digital and virtual tools to ensure that a full age range and social demographic has been reached. This approach also supported continued engagement through social restrictions during the COVID 19 pandemic. ESC offers an online visitor centre which is accessible to different age groups at different locations and times. This can be accessed by anybody with a computer or mobile device. However, for those without access to the internet there has also been 'in person' events and printed materials. Larger print and different language versions have been made available upon request. The Project stakeholder database includes care and residential homes, schools providing inclusive education to those with additional needs and Pupil Referral Units. The database was initially formed through a comprehensive stakeholder analysis at the start of the project and has been added to as the project has developed with input from ESC's economic development and communities' teams, and through interest shown during public engagement events and consultations. ESC's Key Stakeholder Group also includes those who represent charities managing homelessness and substance abuse.

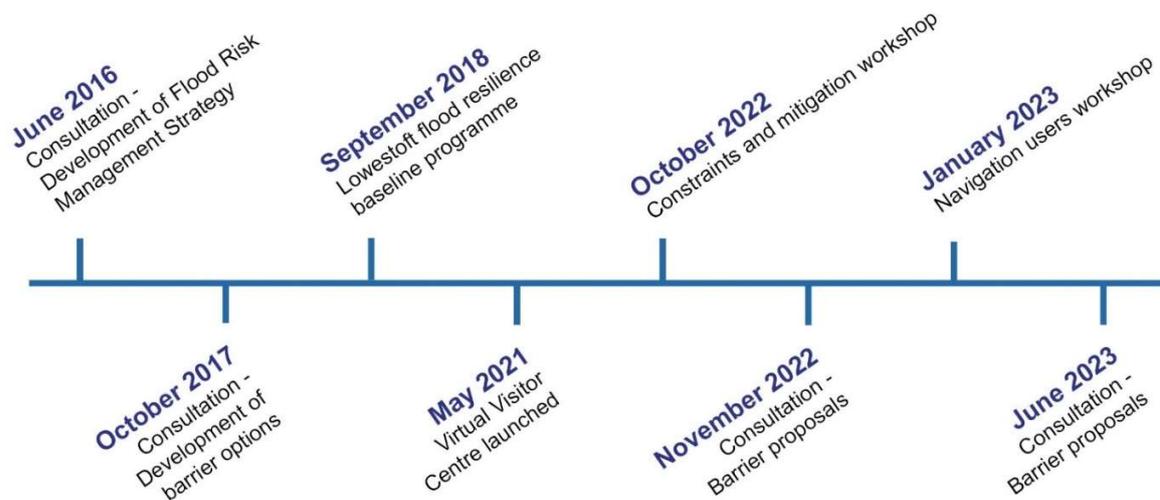
7.8 The overall approach ESC has employed to communication, consultation and engagement has been based on the following principles:

- Engaging directly with key partners and the wider local community.
- Being honest and open and making every effort to avoid raising unrealistic expectations.
- Being transparent about how ESC will engage with the broader community. For example, setting out how people can become informed or involved in the Scheme through regular factsheets and newsletters; encouraging feedback through in person events and through the virtual engagement room. Social media and press releases reinforce this by providing contact information for the ESC team members or by directing them to the Scheme's website where information can be found. Minutes of the Strategic Stakeholder Group and the Key Stakeholder Group meetings are made available to interested parties on request.
- Making time to listen and involve people properly.
- Being clear about the aspects of the proposals on which feedback is being sought.
- Listening and taking feedback received into account to shape the detail and design.
- Being clear about the decisions made and the rationale for them.
- Ensuring that all engagement is clear and ethical and in accordance with the Chartered Institute of Public Relations Code of Conduct.

- 7.9 These principles were reflected in an initial Communications and Engagement Plan prepared at an early stage of the Project this can be found in **Appendix 2**. This has been updated at key stages of the Scheme's development and has guided all stages of communications and engagement. The development of the Scheme has taken place over a number of years and a comprehensive engagement log can be found at **Appendix 1** to this report.
- 7.10 ESC has also been fully mindful of the statutory requirements set down within the 2006 Rules regarding consultation, notably the requirement to produce this report (set down in Rule 10(2)(d)) and the requirement to explain how it has consulted with those organisations listed in Schedules 5 and 6 to the 2006 Rules. It is confirmed that all applicable bodies named in column (2) of Schedules 5 and 6 of the Rules have been consulted. Further information on this aspect of the consultation is provided in **Chapter 13** of this report.
- 7.11 ESC is committed to ensuring that all those who may have an interest in the proposed Scheme have been informed as regards the proposals and provided with adequate opportunity to express their views. A comprehensive stakeholder mapping exercise was undertaken by the project team and the Strategic Steering Group, early on in the Scheme's development to identify and classify stakeholders based on their relationship to the Scheme.
- 7.12 Stakeholder analysis is regularly reviewed to ensure that it remains up to date. After the red line boundary changes in 2023, a thorough review of the stakeholder database has been done with new stakeholders added and additional engagement undertaken. This is included in the Communications and Engagement plan included at **Appendix 2**. The results of the analysis were used to prepare a programme of consultation and engagement activities. Diversity, inclusion and demographic data has been assessed and the results applied to all consultation and engagement (appended in the Equalities Impact Assessment in **Appendix 3**).
- 7.13 In accordance with the Public Services (Social Value) Act 2012 ESC is required to have regard to economic, social and environmental well-being in connection with public services contracts; and for connected purposes. The delivery of social value as part of the contract for this scheme has allowed for additional engagement with local community groups, charitable organisations and organisations supporting those who are socially disadvantaged. This engagement is set out in **Schedule 1 (Public engagement through delivering social value)** to this report.

8 CONSULTATION OVERVIEW

- 8.1 Consultation on the proposal to build a new tidal barrier has taken place over a number of years and has evolved from early consultation on the wider strategic approach to tidal flood management in Lowestoft (in 2016) to targeted consultation on detailed aspects of the proposed Scheme (in 2023).
- 8.2 The following timeline below illustrates the key phases of consultation relevant to the Scheme that ESC has undertaken to date. The context and purpose of each phase is explained below.



LFRRMS Consultation – Summer 2016

- 8.3 In 2016 consultation was undertaken as regards the emerging Lowestoft Flood Risk Management Strategy (**LFRRMS**). The LFRRMS was designed to reduce the risk of pluvial, fluvial and tidal flooding in the town of Lowestoft and was developed between 2014 and 2016. Over 35 organisations (including statutory bodies and non-governmental organisations), Lowestoft Town Council, neighbouring parish councils and members of the public were consulted at key stages of the development of the strategy.
- 8.4 Ongoing consultation and engagement took place through meetings of the Strategic Steering Group, as part of the Lowestoft Transport Infrastructure Group.
- 8.5 An initial introduction to the emerging strategy was launched at a Lowestoft Rising public event on 2 November 2015. This was attended by over 100 people. The event included members of the public, businesses, landowners, members of the fishing community and elected members. This event provided an important opportunity to introduce key stakeholders to the strategy and to seek initial views that could be taken into account during the development of the LFRRMS. Materials from the Lowestoft Rising event are included in **Appendix 4 (2016 consultation materials)** to this report.

8.6 Subsequently, a formal round of public consultation took place between Monday 6 June and Friday 29 July 2016. At this stage, eight options to address tidal flooding were presented as follows:

Table 1: Options to address tidal flooding (2016 Consultation)

Option 1: Do nothing
Option 2: Do minimum
Option 3: Do something – Flood Walls Only
Option 4: Do something – Outer Harbour Barriers and Walls
Option 5: Do something – Bascule Bridge Barrier and Walls
Option 6: Do something – Third Bridge Crossing Barrier and Walls
Option 7: Do something – Temporary Flood Defences Only
Option 8: Do something – Property Level Resilience Measures

8.7 Further details of the above options can be found in Chapter 4 (*Consideration of Alternatives*) of the Environmental Statement (**Application Document A17**).

8.8 A summary of the consultation materials employed during the 2016 LFRMS consultation can also be found at **Appendix 4 (2016 consultation materials)** to this report. This includes, at page 49, a summary of the responses received during the consultation. Public feedback on the proposed options was relatively limited but Option 5 performed favourably. Feedback from key stakeholders including ABP and the Royal Norfolk and Suffolk Yacht Club (**RNSYC**) also favoured Option 5, which proposed a combination of new tidal flood walls and a new tidal barrier¹ in the vicinity of the Bascule Bridge.

8.9 Following the 2016 LFRMS consultation, three of the consulted options were shortlisted for further assessment: options 3, 5 and 6. ESC proceeded to develop a Strategic Outline Business Case. This involved further options appraisal work as is more fully explained in Chapter 4 of the Environmental Statement and the identification of a preferred option – this was option 5 – a new tidal barrier within the vicinity of the existing Bascule Bridge together with tidal flood walls.

¹ At this stage of the Scheme's development, the tidal barrier being contemplated would have provided, when open, a channel width of 28 metres.

8.10 A Strategic Outline Business Case was successfully submitted to the Environment Agency's Large Project Review Group in March 2017. At this stage, the preferred option was endorsed and outline design work for the proposed new tidal barrier and flood defence walls (then known as the 'LFRMP') began.

Scheme Consultation 2017 – 2023

8.11 Consultation and engagement on ESC's preferred option of a new tidal barrier together with tidal flood defence walls, has taken place between 2017 and 2023.

8.12 There have been seven main stages of public engagement and consultation during the development of the Scheme. Three of these (in 2017, 2022 and 2023) involved a formal round of public consultation. For the purposes of this report, the seven stages have been grouped into three distinct phases as follows:

- **Early Scheme Consultation**, explained in **Chapter 9** of this report and comprising:
 - (a) October 2017 – Public Consultation – Development of Barrier Options
 - (b) September 2018 – Lowestoft flood resilience programme
- **Interim Scheme Engagement**, explained in **Chapter 10** of this report and comprising:
 - (a) May 2021 – Virtual Visitor Centre launched
 - (b) October 2022 – Constraints and Mitigations Workshop
- **TWAO Consultation**, explained in **Chapter 11** of this report and comprising:
 - (a) November 2022 – Public Consultation – Barrier Proposals
 - (b) January 2023 – Navigation Users Workshop
 - (c) June 2023 – Public Consultation – Scheme Revisions

8.13 Formal public consultations have ensured that stakeholders and the general public were made aware of, informed about and given the opportunity to contribute to the development of the Scheme. By listening and taking on board the views of the public and interested groups ESC has been able to tap into the widest source of information possible which improves the quality of the decisions reached.

8.14 These public consultation and engagement activities have been designed to regularly share information on the development of the LFRMP and, subsequently the Scheme with members of the public and other interested parties, to provide a forum for discussion, and to invite comment.

8.15 Strategic Steering Group and Key Stakeholder Group meetings have taken place at regular intervals. Newsletters have been sent out quarterly and factsheets relating to specific construction work on the tidal walls and highlighting the overall Scheme have been reshared (copies of the

newsletters can be found at **Appendix 9** to this report). The stakeholder database has been used to mail out (direct and by email). This has been supplemented by postal updates to those directly affected using the electoral roll database held by ESC.

- 8.16 Each of the three formal stages of public consultation (in October 2017, November 2022 and June 2023) shared a common format, comprising:
- (a) Stakeholder meeting(s) held prior to the public consultation period. Workshops were used to provide invited stakeholders with an update on the proposals, a preview of the consultation materials and an opportunity to ask questions.
 - (b) A public exhibition/ drop-in session, widely advertised and open to all. At each exhibition, display boards providing detail of the proposed Scheme were displayed and project team members were available to explain the details. This material was subsequently shared via the LFRMP website. Public drop in events were held over two extended days; allowing for evening attendance. Details of these can be found in the engagement log in **Appendix 1** to this report.
 - (c) A consultation period for return of comments via feedback form, letter or email. Comments were invited after the exhibitions for a period of 6-8 weeks. In addition, stakeholders and members of the public were able to contact the ESC team at any time on the project email address. Details of these can also be found in the engagement log in **Appendix 1**.
- 8.17 Following the 2017 public consultation, further engagement was undertaken as part of the Zurich Flood Alliance UK pilot to provide a baseline for resilience in Lowestoft. Additional workshops enabled involvement in and comment upon the LFRMP to be included. This engagement and the outcomes from it are explained within the report provided in **Appendix 12 (Flood resilience assessment report)**. As opportunities for co-creation are limited with a project of this nature, the nature of resilience baselining offered members of the public the chance to work within their own communities to create actions and action plans that were designed and owned by them, creating not only a sense of responsibility but also a sense of place and how the project (tidal barrier and tidal walls) might contribute to that 'place'. The baselining project, managed by the Zurich Flood Alliance and the London School of Economics, was the UK pilot.
- 8.18 Thereafter, key stakeholder engagement regarding the proposed tidal barrier focussed on the statutory harbour authority and the operator of the Port of Lowestoft, ABP, its tenants, and the RNSYC. Given the intention to construct, operate and maintain a new tidal barrier within the Port, these were considered to be the parties most likely to be affected by the LFRMP proposals. By directing project resources to targeted engagement with those most likely to be affected by the proposals, ESC was able to further develop the proposed Scheme. This, in turn, enabled further public consultation to take place in late 2022.
- 8.19 The global pandemic from March 2020 and the restrictions introduced as a result, adversely affected ESC's ability to engage with members of the general public. Through the introduction of innovative virtual approaches, as more fully explained in **Chapter 10** of this report, ESC

nonetheless provided opportunities for members of the public to remain informed of and involved in the development of the Scheme.

- 8.20 In November 2022, ESC undertook a further round of public consultation. By this stage, the detailed proposals for the Scheme were well settled and consultation was undertaken with a view to preparing for the submission of a TWAO application. Feedback received during this consultation led ESC to undertake additional stakeholder engagement in early 2023. Thereafter, further revisions were made to the proposals to take account of the feedback received. These revisions included changes to the proposed red line boundary for the Scheme. As a result a further round of targeted consultation was considered to be prudent and this took place in June 2023. Further details of the TWAO consultations undertaken can be found in **Chapters 11** and **13** of this Report.

9 EARLY SCHEME CONSULTATION

9.1 This chapter explains the early consultation undertaken by ESC in later 2017 in respect of the emerging proposals for the LFRMP, the wider project which included both the tidal barrier that is the subject of the TWAO application and the associated tidal flood walls. This followed the options appraisal consultation undertaken in respect of the emerging strategy for flood risk management in Lowestoft in summer 2016 (see **Chapter 8** of this report).

Public Consultation on Development of Barrier Options – October 2017

9.2 Following the selection of option 5 as ESC's preferred option, formal consultation was undertaken on the proposed construction of a new tidal barrier and associated flood walls. The consultation took place between 30 October 2017 and 14 December 2017.

9.3 The tidal barrier was proposed to be located in the Inner Harbour Entrance Channel and to deliver a channel width of 28 metres, when in an open position. The proposals assumed that the tidal barrier would be constructed in the winter months only, to minimise disruption to the Port of Lowestoft, its tenants and customers and other users of the navigable channel. Winter-only working was also considered to be beneficial to the local tourist season and businesses operating in that sector.

9.4 The following activities were undertaken as part of the 2017 public consultation:

- (a) A stakeholder workshop took place on 1 November 2017 to explore options appraisal and environmental concerns.
- (b) A public Open Day on 30 November 2017 with a mixed format of formal presentation and Q&A and informal drop-in style of engagement.
- (c) Emails promoting the consultation were issued to all parties listed on the stakeholder database, including key and statutory stakeholders; these were sent on 3, 17 and 23 October 2017.
- (d) Correspondence promoting the consultation was sent to the addresses of businesses and homes who had previously suffered from flooding (information provided through grant information from the December 2013 flood event); these were sent on 3, 17 and 23 October 2017.
- (e) Briefings were given to relevant politicians and Elected Members were emailed on 3 October 2017.

9.5 The consultation was publicised to the general public through:

- (a) Local media publications – advertisements appeared in the Eastern Daily Press, East Anglian Daily Times and Lowestoft Journal on 30 October 2017.

- (b) Social Media – channels used at that time included Twitter and ESC’s Facebook page.
- (c) Posters placed in prominent areas of Lowestoft such as the Marina Centre, library and Post Office.

9.6 Documents were made available to key stakeholders by post or email, and those located within ‘at risk’ areas using contact details provided by ESC colleagues relating to those households and businesses impacted by the 2013 tidal surge, as well as being made available on the LFRMP website, www.lowestoffrmp.org.uk. Examples of the consultation materials can be found in **Appendix 5 (2017 consultation materials)** to this Report, alongside a report summarising the responses received to the consultation. The report was shared by email to those who had provided feedback and made available on the LFRMP website. It was also shared with the project steering group which included key stakeholders and organisations. Due to revisions made to the governance structure, the project steering group became the ‘Strategic Steering Group’ from 2020 onwards.

9.7 Two events took place as follows:

- (a) An environmental workshop took place on 1 November 2017. Over 50 key stakeholders attended this workshop, held at the Orbis Centre, including statutory consultees such as Natural England and the Environment Agency. The workshop considered tidal, fluvial and pluvial flooding and specifically sought views on the environmental implications of the proposed works. A full list of the workshop’s attendees is included in **Appendix 5 (2017 consultation materials)** to this report. Attendees were encouraged to provide feedback on the day and after the event.
- (b) A public open day / exhibition took place in Lowestoft on 30 November 2017. A public exhibition was held in Lowestoft to support the public consultation. The objective was to provide people with an overview of the development of the preferred option, inform them regarding the known details of the proposals at that stage and to provide a platform for members of the public to ask questions, raise their concerns and to enable ESC to learn about any potential constraints. ESC was seeking views:
 - (i) on the visual appearance of the proposed tidal walls and tidal barrier
 - (ii) from river and harbour users
 - (iii) on environmental aspects of the proposals

9.8 41 people attended the environmental workshop and questions (which mainly related to disruption to the navigable channel) were largely posed and responded to in person at the event. The overall sentiment was one of positivity and support for the proposals. Businesses attending and those representing the Chamber of Commerce recognised the economic importance of flood protection for Lowestoft. Presentations were given on a rolling basis throughout the day as well as information

boards, opportunities to ask questions of the project team and information was made available to take away.

9.9 **Appendix 5 (2017 Consultation materials)** to this report includes a full summary of both events. The main points raised regarding the proposed new tidal barrier related to:

- (a) the need to minimise disruption to the operation of the Port of Lowestoft and its users, particularly those operating in the offshore wind sector;
- (b) the frequency of operations and maintenance activities;
- (c) the timing of construction works;
- (d) timescales relating to this and the construction of other major projects in Lowestoft and ongoing investment and maintenance.

9.10 Environmental concerns raised at this time related to the potential for impacts on marine mammals and wildlife, particularly during construction works.

9.11 Concerns were also raised about the perceived view that a tidal surge coming through the Broads might increase flooding in Lake Lothing. The concerns related to the perception that, if a barrier were in place and closed at high tide, the surge tide, which comes into the Broads approximately two hours after impacting upon the open coast, would meet the increased levels in Lake Lothing and add to the flood risk in the Broads.

9.12 Feedback from the consultation supported the development of an initial Outline Business Case for submission to the Environment Agency. Some perceived views, such as the implications of a tidal surge coming through the Broads and the impact upon Lake Lothing as mentioned in the above bullet point, were able to be addressed at the time by sharing modelling results and details for the operation of the proposed tidal barrier.

9.13 Regular meetings were set up with other major project teams, such as the Lowestoft Third Crossing (Gull Wing) to share programmes, providing reassurance around traffic management and timings. Environmental concerns fed into the environmental impact assessment process. Feedback was provided to those who raised comments, by email and through the Strategic Steering Group, as per the governance structure at the time.

9.14 Consultation feedback was received from ABP, the Environment Agency, Natural England, the RNSYC and other key stakeholders either at the environmental workshop or by correspondence sent after the workshop. The sentiment was largely supportive of the proposals but with expected caveats linked to the development of detailed plans for construction, traffic management and future operations and maintenance of the proposed new flood risk management assets. No adverse comments were received about the preferred option of new tidal flood walls and a tidal barrier comprised of 28 metres mitre gates. Further details of the consultation feedback provided can be found in **Appendix 5 (2017 consultation materials)** to this report.

10 INTERIM STAKEHOLDER ENGAGEMENT

- 10.1 This chapter explains stakeholder engagement and other initiatives that took place with the local community between the conclusion of the 2017 public consultation and the first TWAO consultation in late 2022.

Flood Baseline Resilience Programme

- 10.2 As Lowestoft is the only urbanised area in the UK with no formal flood protection measures, ESC considered it to be critical to understand and baseline the level of resilience to the flood risk of its communities and businesses. This was to support the development of the wider LFRMP proposals, including the tidal barrier, and to ensure that communities and businesses in Lowestoft understood the level of current and residual flood risk.
- 10.3 The opportunity to do so became available in 2019 through the innovative tool developed by the Zurich Flood Alliance and the London School of Economics. This tool had been widely used internationally but not in the UK. Lowestoft was the UK's pilot site. Whilst this baselining exercise was not specifically targeted on engaging members of the community and businesses regarding the LFRMP proposals, the nature and extent of the engagement required provided a valuable opportunity to inform the local community about those proposals, to provide project updates and signpost how members of the public could find out more and become involved in the LFRMP proposals as they developed.
- 10.4 Engagement in the baselining exercise took place through:
- (a) Two targeted workshops which took place on 9 and 12 March 2021 with community (including faith leaders) and business leaders
 - (b) Key informant meetings (professional bodies, including emergency management responders)
 - (c) Questionnaires – these were both community and business focused
 - (d) Community forums
 - (e) Emergency planning and resilience community workshops and training
- 10.5 At the initial workshop on 9 March 2021, 35 people, predominately community leaders and business leaders attended. At the second workshop on 12 March 2021, 23 people attended. 17 key informants attended the targeted meeting. 1515 households were surveyed. Outputs from these activities can be seen in **Appendix 12 (flood resilience assessment report)** to this report. The outcomes have informed how ESC can best support communities and businesses to put in place additional resilience measures and support them to manage residual risk in terms of messaging and anticipated action in the event of a tidal surge prior to and following delivery of the proposed new tidal barrier and flood walls.

Implications of a global pandemic on public engagement

- 10.6 During the COVID 19 pandemic continued public engagement was extremely challenging. It was difficult to engage in consultation broadly and inclusively across the community demographic. Digital transformation and the need for hybrid and blended communications and engagement delivery was therefore heightened by the global pandemic.
- 10.7 It became clear that there was a need to invest in digital infrastructure for the Scheme to match the requirements of a modern engagement experience. Added to that, in the face of a climate emergency, was the need to offer sustainable and climate friendly options, reducing emissions in terms of travel, spotlighted by the pandemic and changes in behaviour as a result. ESC tried different methods of engagement during this period as explained below.

Social and digital media

- 10.8 In the UK, 86.4% of the population use one or more social media channels. As part of a comprehensive approach to communications and engagement, the development of social and digital media channels is essential to a continued flow of information. This is evidenced by similar successful barrier projects across the UK, in particular in Bridgwater, Somerset and Boston, Lincolnshire.
- 10.9 In March 2021 ESC promoted the LFRMP proposals on its social media channels providing increased opportunities for engagement in the development of the proposals of which the Scheme formed part. **Table 2** below illustrates the level of engagement with each of the four social media platforms deployed whilst **Table 3** documents the level of engagement with the Scheme's own website.

Table 2: Social media

2021	Twitter	Facebook	Instagram	LinkedIn	Total
Impressions	61972	55783	3159	14718	135632
Page Views	6717	497	263	917	8394
2022	Twitter	Facebook	Instagram	LinkedIn	Total
Impressions	31415	52432	1971	35216	121034
Page Views	4014	618	96	474	5202
Jan - Jun 23	Twitter	Facebook	Insta	LinkedIn	Total
Impressions	8327	33000	316	7500	49143
Page Views	8132	87	47	125	373

Table 3: Digital media

Website stats	2021	2022	Jan - Jun 23	Total
Page visits (unique)	7608	5931	3989	17528
Visitors	6803	4585	2898	14286

Online Engagement Events

- 10.10 ESC organised a series of online engagement events to bring the community up to date with the proposals for a new tidal barrier and to offer opportunity to comment. These events were in the form of Zoom meetings and were proposed to take place on 4 (3 sessions), 6 (2 sessions) and 10 (3 sessions) May 2021. The events were advertised by means of an email which was sent on 29 April 2021 to those persons listed on the stakeholder database, through social media (**Appendix 11**) and by means of an ESC press release, issued on 21 April 2021 (please see **Appendix 10 (Press releases)** to this report). The press release was published in the Lowestoft Journal.
- 10.11 However, these virtual public meetings did not prove to be as popular as hoped. In the end only two meetings took place with 10 attendees participating in total. These included:
- 10.12 **Table 4** sets out the principal issues raised by the attendees at the meetings and summarises the response that was provided by ESC. At this stage, the Scheme proposals still included 28 metre mitre gates and ‘winter only working’.

Table 4: Principal issues raised at Online Engagement Events

Issue / topic raised	Response
Length of any closures of the navigable channel	Advised project was in the design phase working to discreet windows of 4 – 8 hours at a time.
Has modelling been completed on where the body of water might go?	Completed as part of the Gorleston – Pakefield coastal strategy. Model showed the water would be dispersed back into the sea.
Concern around the timescale – 5 years – long time for Lowestoft to remain unprotected.	Temporary barriers will be maintained in the meantime, when the flood walls are completed they will offer an additional level of protection.

Resident on Suffolk Road – very happy with design/ progress.	N/a
When will barrier be in place?	At this stage end of 2025, with caveat construction under challenging conditions (winter months) so could slip.
Really positive for the town – flood water affects the area around Lake Lothing, but knock on effects huge to people and businesses in the town. Fantastic to have an engineering project of this type.	N/a
Town Councillor acknowledged the challenge in getting town to engage, despite advertisement.	Project team encouraged attendees to advocate for the project and spread the word.

- 10.13 As a result of the relatively limited level of engagement that the events generated, ESC concluded that it ought to identify new and more effective ways to engage with the local community notwithstanding the ongoing pandemic.

Virtual Visitor Centre

- 10.14 Later in May 2021, ESC launched its virtual visitor centre to provide information about the emerging LFRMP (now Lowestoft Flood Protection) proposals. The centre can be visited via the following weblink: [Lowestoft Flood Protection Virtual Visitor Centre](#). Screenshots from the Virtual Visitor Centre can also be found at **Appendix 8 (virtual engagement materials)** to this report.
- 10.15 Content within the virtual visitor centre is regularly reviewed and updated, particularly during formal rounds of public consultation. There are opportunities for interested parties to leave questions for the ESC project team and to provide feedback on the proposals, including the Scheme. This can be viewed in **Table 5**.

Table 5: Questions raised through the Virtual Visitor Centre

Date	Comment	Response
21/06/2021	“How will the defences at Lowestoft affect the river Waveney and likelihood,	Directed to flood risk assessment, clarified the project will have no influence on flooding in Bungay.

Date	Comment	Response
	frequency and impacts of flooding upstream?"	
22/06/2021	"How will the defences at Lowestoft affect the river Waveney and likelihood, frequency and impacts of flooding upstream"	Response sent 22 June 2021: "As part of the planning application process a Flood Risk Assessment was undertaken, which found the project will not increase flood risk upstream of the scheme. The project will not have any influence on the flood risk in Bungay. The Flood Risk Assessment can be found at the planning portal under "supporting documents""
10/07/2021	"I have noticed through observing the Environment Agency tidal buoy at Lowestoft that wave heights have been very high this week. I believe wave heights reached 6.83 metres at one point. Is this indicative of an increase in wave heights and tidal velocities in the Lowestoft area?"	Response sent 26 October 2021: "Thank you for your message. Details of the coastal management strategies for the Lowestoft area can be found in the Gorleston to Lowestoft Coastal Strategy."
12/02/2022	"Hi, one question, where will the water go that is deflected by the barrier. What other flood are at risk as a result of that?"	Response confirming there would be no increased flood risk and added flood risk assessment to the Virtual Consultation Room.
12/06/2023	Message received: "If the barriers close what will happen to the water it prevents from coming in -- where will that go?"	Response: "The volume of water that the Lowestoft Flood Protection scheme will stop from going into the town is miniscule compared to the volume of water in the North Sea. Extensive flood risk assessments determined that there are no negative impacts on flood risk outside of the scheme."

10.16 As of 30 June 2023, the engagement rate is as follows:

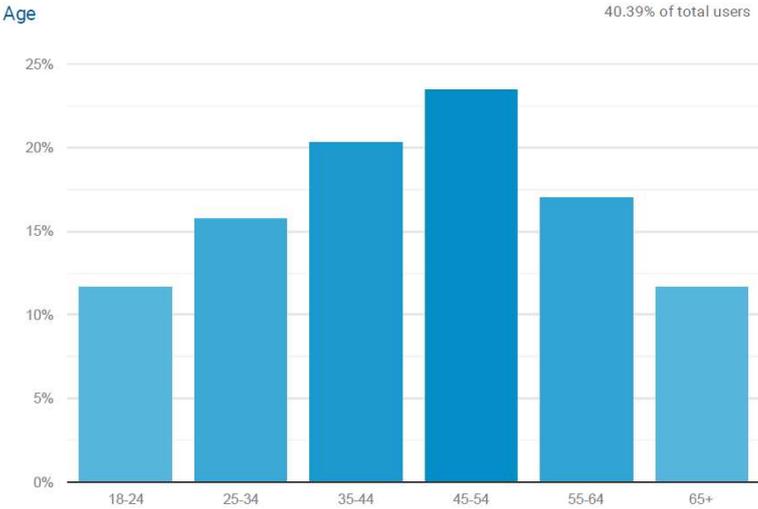
- (a) 1383 sessions
- (b) 4395 page views
- (c) Bounce rate 49.67%

10.17 **Figure 1** below illustrates that 90% of those visiting are new users whilst **Figure 2** illustrates the demographic of visitors.

Figure 1: New and returning users



Figure 2: Demographic of visitors



10.18 An additional challenge to traditional engagement methods is attracting those in the 18 to 45 age bracket. Good analytics from the Scheme’s virtual engagement tool demonstrates that approaches,

reach and inclusion are at encouraging levels across all age ranges (see **Figure 2** above). This provides quantitative results to support ESC's commitment to equality, inclusion and diversity as set out in **Appendix 3 (Equalities Impact Assessment)**.

- 10.19 The virtual visitor centre continues to operate and in the event that the Secretary of State determines to authorise the Scheme, it will continue to be available throughout the Scheme's detailed design and delivery phases.
- 10.20 The development of the navigational assessments was progressed in partnership with the Harbour Authority. They provided feedback on the limitations of previous navigation simulations used on other projects and it was agreed to instruct HR Wallingford. The reports of the navigation simulations undertaken can be found within Appendix 15C and 15D of the Environmental Statement (**application document A17**). Using the expertise of the Harbour Authority pilots it became clear that a 28 metre barrier would not allow safe navigation of vessels through the inner harbour entrance channel. Working with the Harbour Authority, ESC identified the need to widen the gates to improve navigation and the evolution of the design to incorporate 40 metre mitre gates was agreed.
- 10.21 The increased width of the barrier improves the resilience of the barrier gates and reduces restrictions on the future development of the Lake Lothing entrance channel. The change to a 40 metre barrier was introduced in 2021 – please see **Appendix 13 (Engagement on Navigation Simulations)** to this report. Communications and engagement to that point had focused on the previous 28 metre design.
- 10.22 It is important to note that from initial consultation in 2016 through to October 2022, ESC was engaging and consulting with people based on construction taking place during winter months only, thereby minimising disruption to navigation users, key Port operations and impacts during the main tourist season. From October 2022, with the development of the detailed design and construction methodology, it also became clear after working with ABP, the statutory Harbour Authority, that this would need to change to year-round working.
- 10.23 Since October 2022 wider consultation and engagement has been undertaken to inform and seek views from those directly affected by the proposals such as those in the fishing industry, key navigation users (both commercial and leisure) and Port operators and their tenants, as is explained in the remainder of this report. Opportunities have also been given to discuss the implications of the Scheme with consultees and better understand the nature of any concerns. Key outputs from these discussions are explained within the remainder of this report and its appendices.

11 TWAO CONSULTATION

- 11.1 By late summer 2022, ESC had further developed its plans for the proposed Scheme. In particular, some key changes had taken place to the proposed scheme.
- 11.2 ESC therefore determined that it was an appropriate juncture to undertake a further round of formal public consultation on its proposals. Prior to the launch of the public consultation, ESC hosted a key stakeholder workshop as is explained below.

Key stakeholder workshop (October 2022)

- 11.3 The key stakeholder workshop took place on 21 October 2022. It was hosted by the Key Stakeholder Group, to provide an overview of the Scheme development to date and to explore with key stakeholders important aspects of the proposals, including the proposed method of construction of the tidal barrier, arrangements for the operation of the tidal barrier, impacts on navigation within the Port of Lowestoft and progress with the Environmental Impact Assessment. Email invitations were sent to businesses, organisations, town and parish councils and statutory authorities potentially affected by the Scheme. These invitations were sent out on 21 September, with two email reminders sent out on 29 September and 14 October 2022.
- 11.4 The workshop was structured as follows:
- (a) Construction methodology and year-round working – issues, constraints and implications.
 - (b) Environmental Statement – issues, constraints and implications
 - (c) Operations and maintenance – issues, constraints and implications
- 11.5 After presentations and informal questions and answers, attendees were asked to work in groups to discuss their views. Those views were shared with the wider group through feedback and further comments were also added.
- 11.6 The workshop also presented an opportunity for key stakeholders to provide feedback to ESC on the proposed consultation plans and materials, ahead of the wider public consultation that was scheduled to take place between 21 November 2022 and 12 January 2023.
- 11.7 36 people attended the workshop. Of these, seven represented statutory consultees, namely those identified under Rule 13 and those named in Schedules 5 and 6 to the 2006 Rules as seen on page 86 of **Appendix 6 (2022 consultation materials)** to this report. Feedback was collated from the event and fed into project development.
- 11.8 The tables in **Schedule 2 (Summary of matters raised in key stakeholder workshop)** to this report summarise the principal issues raised during the workshop and the responses from the project team. Outputs of the workshop were then collated and fed back to delegates by email as well as those who were not able to attend, with a prompt to provide any additional feedback.

Public Consultation (Winter 2022/23)

- 11.9 Following the key stakeholder workshop on 22 October 2022, ESC reviewed its proposed consultation plans and materials taking account of the feedback received from those who attended that workshop. Thereafter a public consultation was held between 21 November 2022 and 12 January 2023. This consultation was specifically undertaken to update members of the public on the proposals for the Scheme and in anticipation of final preparations for the submission of the Transport and Works Act Order application to the Secretary of State.
- 11.10 The public consultation explained the proposals, focusing on key changes since the last round of formal public consultation back in 2017. In particular, the consultation materials explained that the design of the proposed barrier had evolved and that the width of the proposed mitre gates comprised within the barrier had changed from 28 metres to wider 40 metres, to allow for safer navigation through the barrier. As noted in Chapter 10 of this report, a revised construction methodology had also been developed; this included year-round working rather than winter-only working as had originally been proposed by ESC.
- 11.11 Views were also sought on the outputs of the Navigation Impact Assessment, construction of the tidal barrier, operation of the tidal barrier and the likely environmental effects of the proposals more broadly. The consultation was widely advertised.
- 11.12 The consultation was publicised in the local press, including the Eastern Daily Press and the Lowestoft Journal. A copy of the press release deployed can be seen on page 23 of **Appendix 10 (Press releases)** to this report and the consultation was publicised on local radio and on the BBC website.
- 11.13 The consultation was publicised on social media, notably Facebook, Instagram and Twitter and details of it were made available at local outlets including Lowestoft library, local shop fronts and at ESC's offices.
- 11.14 On 16 November 2022 a direct mailing about the consultation was sent out to 1,202 recipients (a copy can be found on page 100 of **Appendix 6 (2022 consultation materials)**), drawn from the following groups to inform them about the forthcoming consultation:
- (a) all parties named on the Project stakeholder database (306 recipients)
 - (b) all parties named in an early draft of the book of reference (604 recipients)
 - (c) local residents who were identified as being directly affected from the data collected post December 2013 tidal surge, data taken from the Environmental Impact Assessment and using electoral roll data. (131 recipients)
 - (d) residents of Taylor Properties (161 recipients). This was as a result of a representative of Taylor Properties attending the consultation drop in and requesting specific information be sent to their tenants.

- 11.15 Two public consultation drop-in events were held at the RNSYC in Lowestoft on 23 and 24 November 2022. These were attended by 42 people and a list of attendees can be found in **Appendix 6 (2022 consultation materials)** of this report.
- 11.16 Adverse weather conditions led to concerns about the level of attendance at the events. ESC identified gaps in engagement with specific groups. Additional face to face engagement with businesses (directly affected), fishing groups (commercial and leisure) and inner harbour marine users took place in the form of visits to businesses/places of work and group meetings. Further details of this additional engagement is reported in ESC's engagement log (see **Appendix 1** to this report) and within **Schedule 3 (Stakeholder engagement: feedback received)** to this report.
- 11.17 Feedback given directly to officers from these face-to-face visits suggested that targeted workshops for businesses/leisure users situated in the Port's inner harbour further up the navigation channel into Oulton Broad would be advisable. A series of workshops were then organised. Outputs of these workshops are included in **Schedule 4 (Further engagement with navigation users)** to this report.
- 11.18 10 detailed written consultation responses were received by the close of the public consultation. Copies of these responses are provided in **Schedule 5 (Responses to November 2022 consultation)** to this report. The issues raised were predominately around the desire for advance notice, noise, vibration, channel closure and impacts on navigation.
- 11.19 As a result of the relatively low number of responses received to the consultation, additional workshops were arranged with navigation users, both leisure and commercial users. Details of these can be found in **Schedule 4 (Further engagement with navigation users)** to this report. Comments relating to operations and maintenance such as advance notice of any planned maintenance works and advance notice of any closures for regular maintenance such as the reduction of silt build up, have been taken forward and included as an operations and maintenance plan for the Barrier is developed.
- 11.20 Following analysis of the feedback received during the public consultation, ESC concluded that further workshops, focused on environmental and navigation impacts, should take place.

Navigation users' workshops January/ February 2023

- 11.21 Following the close of the public consultation in January 2023 a series of additional workshops were scheduled. 15 navigation users were invited to attend the workshops, which took place in February 2023. During the consultation, feedback was received from representatives of both leisure and commercial navigation users. This feedback suggested that workshops specifically for those in channel users, either for pleasure or business, would be beneficial as the impacts of construction would affect their use of the channel. The workshops were targeted at businesses/leisure users situated in the Port's inner harbour and further up the navigation channel into Oulton Broad. Outputs of these workshops are included in **Schedule 4 (Further engagement with navigation users)**.

- 11.22 These additional workshops around navigation usage and environmental issues enabled ESC to further engage with key stakeholders and members of the community and businesses. Table 14 in **Schedule 4 (Further engagement with navigation users)** to this report summarises the further meetings that ESC held with navigation users following the workshops referred to above.
- 11.23 The feedback received has informed the progression of the construction methodology, particularly in respect of proposed channel closures and the need for early notification and for channel closures to avoid the months of July and August.
- 11.24 This has allowed the project team to better understand and have regard to views expressed on:
- (a) Leisure use and implications for access and egress of the inner harbour during channel closure;
 - (b) Implications for changes to the outer harbour in terms of refuelling and berthing;
 - (c) Implications for water dependent businesses;
 - (d) Implications for tourism;
 - (e) Implications for Port operations;
 - (f) Implications of access for the fishing industry; and
 - (g) Implications of access and egress of RNLI vessels for emergency use.

Public Consultation (Spring 2023)

- 11.25 Following the conclusion of the public consultation in January 2023 and the workshops which took place thereafter, ESC sought to further refine and develop its proposals for the tidal barrier.
- 11.26 A new site compound, at Colin Law Way, was selected as being preferable to the location previously proposed on Commercial Road. The new compound would enable construction materials to travel to the barrier construction site via Lake Lothing, thereby reducing the volume of vehicular traffic.
- 11.27 The construction methodology for the proposed tidal barrier also further evolved and the duration and extent of channel closures required to deliver the Scheme became clearer.
- 11.28 In view of these and other minor changes to the Scheme since last consulted on publicly in late 2022, ESC determined that a further round of targeted public consultation should be undertaken over a 4-week period.
- 11.29 The consultation took place between 5 June and 3 July 2023.
- 11.30 The consultation was advertised as follows:

12 **Table 6: Advertisement of consultation**

Item	Medium	Number
Stakeholder database	Email	306
Direct mail – previous Book of Reference	Direct mail	126
Direct mail – updated Book of Reference	Direct mail	45
Direct mail – homes at risk of flooding	Direct mail	600
Local advertising	Posters in local venues/shops/businesses, for example tourist locations such as East Point Pavilion	50
Local advertising	A1 sandwich boards – library and ESC Offices	2
Press release issued and carried by the following:	Eastern Daily Press	Circulation 15,255 (printed) Online unknown
	East Anglian Daily Times	Circulation 7721 (printed) Online unknown
	Lowestoft Journal	Circulation 4779 (printed) Online unknown
Social – paid for	Facebook	Table 7
Social – earned	LinkedIn Facebook	Table 6

- 12.1 Two drop in events were held on 13 and 14 June 2023 at the East Point Pavilion, a venue at the centre of the tourist area in Lowestoft.
- 12.2 57 people attended the drop ins. This included members of the public, businesses and landowners directly affected by the works such as the RNSYC and Anglian Water. Materials used to advertise the consultation and for the drop in events can be found in **Appendix 7 (2023 consultation materials)** to this report.
- 12.3 The virtual engagement room for the scheme was updated to reflect the consultation materials and was live from 8 June. 650 unique users accessed the visitor centre during the public consultation.
- 12.4 To extend the consultation reach, a combination of paid for social media advertising and earned (organic) social media posts was used. Tables 6 and 7 below contain reach.

Table 7: social media channel (earned)

Platform	Reach
Facebook	4,253
LinkedIn	1,308
Total	5,561

Table 8: social media channels (paid for)

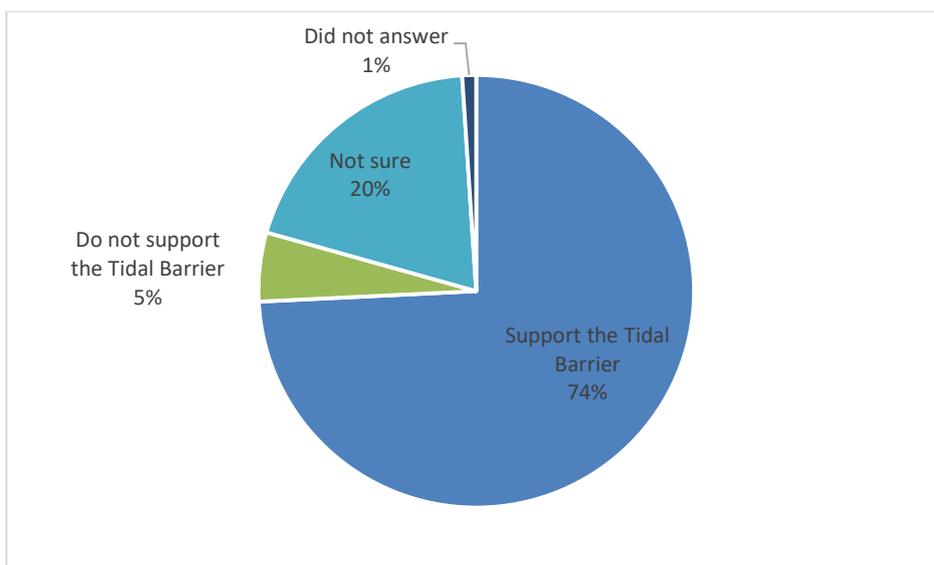
Ad-set	Impressions	Reach	Clicks	Cost Per Click	Click Through Rate
Direct2Survey	81,944	27,484	2412	£0.09	2.94%
Virtual Visitor Centre	148,300	25,408	720	£0.28	0.49%
Drop-Ins	17,151	8,836	168	£0.28	0.98%
Total	247,395	61,728	3,300	£0.22	1.47%

- 12.5 97 survey responses were received during the consultation period. These were received by post and through the online survey. Seven were received by post and the remainder through the online survey. In addition to the online survey responses three responses were received by individual

letter from two navigation users, who are tenants of the Harbour Authority, and the Environment Agency. A summary of the feedback is included in **Schedule 6 (Responses to June 2023 consultation)** to this report.

- 12.6 Port tenants were offered individual meetings. Three tenants took the opportunity to meet with the Head of Partnership and Head of Planning and Coastal Management. Summaries of the key matters raised by the tenants can be found in Table 20 of **Schedule 6 (Responses to June 2023 consultation)** to this report. All three tenants expressed support for the project. Concerns raised were predominately linked to prolonged closures of the channel, particularly linked to fuelling of vessels. Assurances were made of further meetings to enable dialogue to continue.
- 12.7 Of the responses received to the consultation 74% were supportive of the Scheme. 5% were not supportive citing mainly concerns around flooding coming through sewers or misunderstandings around the role of the coastal defences (rock groynes) in protecting Lowestoft. Of the 20% that were not sure there was an uncertainty of how the proposed scheme could be effective. Information detailing the consultation responses can be found in **Schedule 6 (Responses to June 2023 consultation)** to this report.

Figure 3 – percentage support/non-support for the proposals



- 12.8 Consultation responses were analysed at consultation end. Where respondents had left contact details a response has been provided if questions were asked. Where questions had not been asked an acknowledgement of receipt of the response has been provided. Of the 97 responses received 21 people responded leaving contact details.
- 12.9 Across social media, the most common comments received were relating to increased flooding in Oulton Broad and to other areas along the open coast. Explanations have been provided to support greater understanding that the scheme proposed will not increase the level of flooding to other areas.

- 12.10 Of the 97 responses the issues raised related to increased noise, vibration (impacts to property) and increased levels of traffic during construction. There were also concerns raised about the increase in flooding to Oulton Broad and to other areas along the open coast as with social media.
- 12.11 Responses to the concerns about flooding in Oulton Broad and on the open coast have been provided to those who have given contact details. A FAQ document has been developed by the project team which will be available on the Scheme website and virtual engagement room to help address these concerns in future.
- 12.12 Concerns raised through the formal consultation responses received through the survey relating to noise, vibration and increased levels of traffic have been responded to using information already within the scheme construction methodology.
- 12.13 Included in **Schedule 6 (Responses to June 2023 consultation)** to this report are the responses received from Port tenants and a summary is provided there to explain how those responses have been taken into account. The matters raised by the Environment Agency in the context of its response to the consultation undertaken in respect of the draft Order (see Chapter 13 of this report) are considered in Chapter 5 of the ES (**Application Document A17**).

13 REGULATORY EIA CONSULTATION

Environmental Impact Assessment

- 13.1 Environmental Impact Assessment (**EIA**) is a fundamental part of developing the Scheme. The findings of the EIA are presented in the Environmental Statement (**ES**) which is being submitted in support of the TWAO application. Consultation is a key element in the development and formulation of the EIA and is referred to here as Regulatory EIA consultation.
- 13.2 Regulatory EIA consultation has been carried out at key stages in the EIA process between 2017 and 2023 in order to understand the views and opinions of a number of statutory bodies and interested parties with regards to the Project and to ascertain what they consider to be key issues and priorities.
- 13.3 This chapter outlines the key stages of regulatory consultation undertaken for the EIA.

EIA Scoping consultation

- 13.4 In November 2017 a Preliminary Environmental Impacts Report (PEIR) was submitted to the Secretary of State for the Environment, Food and Rural Affairs and the Marine Management Organisation (MMO) alongside a request for an EIA scoping opinion. As part of the scoping process, a number of statutory consultees were invited to provide comments on the proposed scope of the EIA and these responses were included within the Scoping Opinions issued in June and October 2018. Copies of these responses are provided within **Appendix 1A** to the ES (**Application Document A17**). All comments received by consultees have been taken into account in the EIA process as more fully explained within Chapter 5 of the ES (**Application Document A17**).

Environmental Stakeholder consultation 2023

- 13.5 Further regulatory consultation with environmental stakeholders in the spring of 2023. Details of the parties consulted, the feedback received and how this has been taken into account is set out within Table 5-3 of Chapter 5 of the ES (**Application Document A17**).

14 CONSULTATION ON DRAFT TWAO

- 14.1 Rule 10(2)(d) of the 2006 Rules provides that an applicant for a TWAO should confirm, in the consultation report which accompanies the application, that relevant organisations identified in Schedules 5 and 6 to those Rules (who are entitled to either receive a copy of the application as made, or to be served with notice of the making of the application) have been consulted).
- 14.2 In addition to the consultation undertaken and described within this report, on 25 May 2023 all organisations (with two exceptions for the reasons explained below) named in column (2) of Schedules 5 and 6 to the 2006 Rules and considered relevant to the Scheme were sent a copy of the draft TWAO, an explanatory memorandum explaining the intended purpose and effect of each article of the draft TWAO and an associated plan showing the nature and extent of the Scheme. All consultees were invited to provide comments on the draft TWAO by Friday 7 July 2023. Since the draft TWAO was sent to the Schedule 5 and Schedule 6 consultees in May 2023, two further parties have been identified as falling within category 16 of Schedule 6 to the 2006 Rules, namely Peterson and Southampton Marine Services Ltd. Although these consultees were not contacted on 25 May 2023 they have been consulted on the Scheme (see for instance Table 20 of **Schedule 6 (Responses to June 2023 consultation)** to this report).
- 14.3 The letter also explained that a TWAO application was being prepared, that a public consultation would start on 5 June 2023 and, in the case of statutory consultees listed in Schedule 5 to the 2006 Rules, the letter also asked the consultee to return a pre-paid proforma advising whether they wished to receive, when the application was submitted, the TWAO application documents electronically or in hard copy.
- 14.4 Copies of the letters that were sent alongside the draft TWAO, together with a list of all organisations to whom the letters were sent, can be found at **Appendix 14 (Draft Order Consultation Materials (May 2023))** to this report.
- 14.5 By Friday 7 July 2023 responses had been received from ten organisations. Comments on the draft Order were received from Associated British Ports, the Environment Agency, Royal Mail and Trinity House. A summary of the matters raised by those bodies in relation to the draft Order and details of how these have informed progression of the proposals and the drafting of the proposed TWAO (**application document A2**), is provided at **Schedule 7 (Feedback received from consultees on Draft Order (May 2023))** to this report. Comments relating to the Scheme's potential environmental impacts were received from the Environment Agency, Historic England and the Inland Waterways Association and these are summarised at Table 5-4 of Chapter 5 (*Consultation*) to the Environmental Statement (**Application Document A17**), along with details of how the matters raised have been considered. Natural England, National Highways and the Marine Management Organisation responded acknowledging the consultation but did not raise any comments.
- 14.6 Following legislative amendments made to the 2006 Rules announced in July 2023 to enable applications to be submitted, served and progressed in electronic format, the Schedule 5 bodies were sent a further letter, on 31 July 2023, explaining they would no longer be issued with printed copies or USB sticks containing the application documents. The letter explained that the written notice of the application that they would still receive would provide details of where to view the

application documents on a website and how a paper copy might be requested. A copy of this letter can also be found at **Appendix 14 (Draft Order Consultation Materials (May 2023))** to this report. Essex and Suffolk Water responded to the letter of 31 July 2023 stating that they were unable to trace having received the 25 May 2023 letter and requesting a copy. A copy of the 25 May 2023 letter was emailed to Essex and Suffolk Water who responded to acknowledge receipt.

15 FUTURE CONSULTATION

15.1 Should the Secretary of State determine to authorise the Scheme, consultation, engagement and information sharing will continue throughout the detailed design, construction and operational stages of the proposed tidal barrier. Future planned consultation activities include:

- individual meetings with landowners, and their representatives, who are directly affected by the proposals;
- consultation with affected landowners during the detailed design and construction stages of the Scheme;
- ongoing meetings with other affected groups, in particular with marine users and the fishing community;
- keeping the local community and general public informed of Scheme progress;
- ongoing Strategic Steering Group and Key Stakeholder Group meetings through the detailed design stage to support and inform further development and to help identify opportunities and enhancements that the Scheme could help to deliver; and
- a Community Liaison Manager will be appointed for the duration of the construction programme and a Stakeholder Communications Plan will be developed and implemented that includes community engagement before work commences (see the Mitigation Action Plan at Appendix 18A to the ES (**Application Document A17**)).

SCHEDULE 1

PUBLIC ENGAGEMENT THROUGH DELIVERING SOCIAL VALUE

The Public Services (Social Value) Act 2013 requires those who commission public services to think about how they can also secure wider social, economic and environmental benefits, securing these for their local area and stakeholders.

Scheme contractors Balfour Beatty are commissioned through the Scape Framework. The Scape Framework is a founding member of the National Social Value Taskforce and in partnership with the Social Value Portal, they helped to develop the National TOMs (Themes, Outcomes and Measures), a set of economic, social and environmental performance measures which underpin every project. They rigorously measure and report on performance management. The provides the Scheme with evidence to calculate the impact and success of the Scheme locally.

However, the development of social value for the Scheme has not just focused on the procurement of local services. It has also provided additional opportunity for engagement with local people and businesses, particularly those at the beginning of their career; enabling young people and their families to gain valuable insights into and opportunities to become involved in the Scheme. The infographic below provides a view of the number of students engaged, work experience placements taken up and employment provided across the lifetime time of the Scheme to date. The result of this engagement means that over 2000 families in Lowestoft are better informed of the Scheme, with the opportunity to pose questions and raise concerns.

Figure 4: Social value infographic (2016 to 2023)



Engagement with schools and colleges

We recognise the importance of engaging students in the understanding of climate change and flood risk, particularly relating to where they live.

In 2017, in partnership with Flipside UK and as part of the Watertight Words literacy initiative, an exercise took place involving over 1,000 students at schools and colleges in Lowestoft. Students were encouraged, through a series of workshops, to express the words and phrases that they associated with the sea. The results of these workshops were translated into display boards that were placed initially on the Town Hall and then moved to other locations in Lowestoft.

A series of those words and phrases will be etched inside the glass tidal flood walls which are adjacent to the tidal barrier and will be accompanied by interpretation boards.

We have initiated a number of events at schools and colleges including:

- (a) careers fairs;
- (b) talks with colleges about career opportunities/apprenticeships on the project (resulting in six apprenticeships to date);
- (c) school visits;
- (d) virtual and in person work experience (30 weeks in total);
- (e) virtual student career's fair (from 2021 to date) [Norfolk and Suffolk Coast Forum Careers Fair 2022 - in partnership with the Lowestoft Flood Protection Project \(exhibition.app\)](#). Screenshots of the Virtual Careers Fair can also be found at **Appendix 8(virtual engagement materials)** to this report; and
- (f) student specific Norfolk and Suffolk Coast Conference workshops and learning opportunities (2018, 2019, 2021 (virtual) and 2022 (virtual) conference).

In October 2022 a competition was launched for schools in Lowestoft to encourage entries to support the naming of the proposed tidal barrier. This closes at the end of the academic year 2023. Further activities leading up to this period, designed to encourage participation, are planned.

SCHEDULE 2

SUMMARY OF MATTERS RAISED IN KEY STAKEHOLDER WORKSHOP (OCTOBER 2022)

The tables provided in this Schedule summarise the principal issues raised during the Key Stakeholder Workshop held on 21 October 2022, the responses given by ESC at that time and, where relevant, any updates to that initial response to reflect the latest position at the time of preparing this report.

Table 11: Noise/ Vibration

Issue/ topic raised	ESC response (2022)	Current position
Precondition surveys – properties to be inspected.	The extent of this is to be confirmed by ESC once the vibration data has been analysed.	The effects of vibration have been assessed in Chapter 9 of the ES (Noise & Vibration). The assessment concluded that a Vibration Management Plan will be required to ascertain on site measurement of vibration levels associated with piling and to set out a framework of controls which will be agreed with ESC Environmental Protection Officers.
Impact on tourism.	Minimal envisaged. ESC to confirm response.	<p>A long-term benefit and key objective of the Scheme will be improved tourism as a result of reduced flood risk.</p> <p>Channel closures will not take place between mid-July and the end of August to minimise disruption during the peak sailing season (see Chapter 15 (Navigation) of the ES).</p> <p>Channel closures and piling works will be planned and communicated in advance (Chapter 15 (Navigation) of the ES).</p> <p>Chapter 8 (Population & Human Health) notes that while there will be disruption to facilities such as the Yacht Basin, Royal Plain, South Pier, Bandstand Pier / Heritage Quay and Royal Green / Royal Green Car Park</p>

Issue/ topic raised	ESC response (2022)	Current position
		during construction, this will be temporary, with mitigation in place to minimise impacts.
Sink holes in RNSYC area.	This is an Anglian Water issue.	The sink holes were a collapsed sewer which has now been now corrected by Anglian Water.
Impact of vibration on the Bascule Bridge – potential disruption should bridge fail. Detailed inspection required, before during and after piling.	Bascule Bridge reports requested. Monitoring will be agreed with stakeholders by ESC.	The effects of vibration have been assessed in Chapter 9 of the ES (Noise & Vibration). The assessment concluded that a Vibration Management Plan will be required to ascertain on site measurement of vibration levels associated with piling and to set out a framework of controls which will be agreed with ESC Environmental Protection Officers.
Use learning from vibration monitoring for tidal walls and test pile.	Already in place. In addition, we are using data collected from LEEF project.	The construction methodology takes into consideration lessons learnt from previous phases. In addition, Chapter 9 of the ES (Noise & Vibration) identifies the need for a Vibration Management Plan which includes a requirement to undertake test piling.
Suggestion of piling on both sides at same time to mitigate length of operations.	Operations will be optimised where feasible.	The approach to construction will be optimised where feasible and will balance the need to minimise disruption to the Inner Harbour Entrance channel with the need to limit significant levels of noise and vibration.
Impact from sustained noise on local employees/ residents/ pedestrians.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC.	Appropriate monitoring and mitigation will be in place during construction work (as set out in Chapter 9 of the ES (Noise & Vibration)). There will be some disruption, any piling works will be planned and communicated in advance.

Issue/ topic raised	ESC response (2022)	Current position
Piling activities for such large scale construction works will be very disruptive to local residents in the immediate area. Work scheduling will be crucial to ensure disruption avoids sleeping times.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC. Construction work is scheduled to take place during the day, any night works will be communicated in advance.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)). Construction work is scheduled to take place during the day, any night works will be communicated in advance.
Port operators – operators on radio to vessels need clear listening capacity.	Noted.	Noted.
Look at cross impacts on road/ pedestrians from other major projects in area.	Currently, there are no known projects occurring at the time of the barrier construction period, the EIA process will consider this.	The ESC team will coordinate with adjacent projects.
Impacts on businesses – especially those with outside seating and those operating in the channel – prolonged and continued noise/ vibration may affect trade/ drive people away – loss of revenue.	The noisy periods of construction (mainly piling), are currently around three months duration spread over a 10-month period.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)). Piling activities will be planned and communicated in advance,
Consider noise impact on residents near/ around site compound.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)). Piling activities will be planned and communicated in advance,
Consider local residents who are shift workers –	Current planned works are day shifts only. Some longer shifts and	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)). Piling activities

Issue/ topic raised	ESC response (2022)	Current position
sleep could be impacted by noise/ vibration	night works may be required. These will be notified in advance.	will be planned and communicated in advance.
Some disruption while transiting the bridge channel. Significant disruption while on the waiting pontoon in the Trawl Dock and in the RNSYC, particularly if piling is 24/7.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC.	Working hours and construction activities will be planned and communicated in advance. Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)).
My business is based by the harbour, delivering training could be an issue if there is continuous noise.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC.	Working hours and construction activities will be planned and communicated in advance. Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)).
An impact on operations / audiences at Marina Theatre. Audible in auditorium for audiences. Resulting in complaints, lower attendance & decrease in revenue. Causing headaches for staff, affecting well-being & work environment, resulting in lower work output & possible increased staff turnover.	Appropriate monitoring and mitigation will be agreed with stakeholders by ESC.	Working hours and construction activities will be planned and communicated in advance. Appropriate monitoring and mitigation will be agreed with stakeholders by ESC (as set out in Chapter 9 of the ES (Noise & Vibration)).

Table 12: Traffic

Issue/ topic raised	ESC Response (2022)	Current position
Gull Wing should be open taking much of the traffic – impact on traffic/ pedestrians heading to the town centre.	Noted.	Noted. This has been considered in the traffic assessment reported in Chapter 14 of the ES.
Impact on road access to RNSYC.	Construction traffic will be required on RNSYC road access. Measures to be agreed with stakeholders.	A traffic management plan will be in place and communicated in advance (as set out in Chapter 14 of the ES (Transport)).
Concerns around lorry movements – consultation with bus operators required.	Traffic impact should be minimal and not affect the bus operators.	Impacts on traffic (severance & delay) are assessed in Chapter 14 of the ES and conclude that these impacts will be minor adverse. A traffic management plan will be in place and communicated in advance (as set out in Chapter 14 of the ES (Transport)).
Blue light responder concerns - traffic congestion, time of Bascule Bridge elevated, need to map out pinch points.	Traffic impact should be minimal. Bridge openings as per current openings. Gullwing is due to be complete by this stage.	Impacts on traffic (severance & delay) are assessed in Chapter 14 of the ES and conclude that these impacts will be minor adverse. Communication with blue light responders and stakeholders will take place throughout the construction phase. A traffic management plan will be in place and communicated in advance (as set out in Chapter 14 of the ES (Transport)).
Pedestrian access on Royal Plain needs managing due to heavy vehicles.	Construction traffic will be required on RNSYC road access. Measures to be agreed with stakeholders.	A traffic management plan will be in place and communicated in advance (as set out in Chapter 14 of the ES (Transport)).

Issue/ topic raised	ESC Response (2022)	Current position
Risk to pedestrians from increased/ disrupted traffic.	Construction traffic will be required on RNSYC road access. Measures to be agreed with stakeholders.	A traffic management plan will be in place and communicated in advance (as set out in Chapter 14 of the ES (Transport)).
Concerns around causing congestion – avoid Victoria Road and Oulton Broad.	Traffic impact should be minimal, the EIA process will consider this.	Impacts on traffic (severance & delay) are assessed in Chapter 14 of the ES and conclude that these impacts will be minor adverse. A traffic management plan will be in place and communicated in advance (as set out in Chapter 14 of the ES (Transport)).
Consider the Pea season – arrive to Birds Eye on tractors 24/7.	Noted. ESC to instruct constraint.	Noted. Will be raised with key stakeholders to ensure minimal disruption.

Table 13: Ecology

Issue/ topic raised	ESC Response (2022)	Current position
Environment protection team may be inundated with queries re/ noise and vibration concerns.	Comment noted.	Noted. Consultation with this team has been held and there will be ongoing engagement (as needed).
Marine Management Organisation (MMO) – conditions on licence associated with noise levels – consider East Marine Plan Refresh and MMO tourism policy.	Engagement with the MMO has been undertaken previously and will continue as the scheme proposals develop. The Eastern Marine Plan has been considered in the Scheme's emerging EIA; any update to the plan will be reflected in the final ES. MMO tourism policy noted.	MMO engagement is underway.

Issue/ topic raised	ESC Response (2022)	Current position
<p>Disturbance to pets/ domestic animals in area.</p>	<p>Disturbance impacts on pets / domestic animals is not considered within the emerging EIA. With respect to noise and vibration, pets / domestic animals are not considered as sensitive receptors in impact assessment guidance and a methodology for assessment of noise and vibration impacts on pets is not available. However, it is reasonable to assume that any mitigation recommended to lessen impacts on human receptors would also be beneficial to pets / domestic animals.</p>	<p>Disturbance impacts on pets / domestic animals is not considered within the EIA. With respect to noise and vibration, pets / domestic animals are not considered as sensitive receptors in impact assessment guidance and a methodology for assessment of noise and vibration impacts on pets is not available. However, it is reasonable to assume that any mitigation recommended to lessen impacts on human receptors would also be beneficial to pets / domestic animals.</p>
<p>Disturbance from noise/ vibration on fish, migratory fish (eels), birds, breeding birds and other sensitive species including land mammals and their food source.</p>	<p>Disturbance from noise and vibration during construction on marine and terrestrial ecology has been considered in the emerging EIA. Behavioural (avoidance) and physiological (barotrauma) impacts on fish and migratory fish have been considered, with a simple transmission loss model used to determine the distances over which impacts may occur, noting that the existing harbour infrastructure will provide some attenuation of noise/vibration effects. Breeding bird (notably Kittiwake), will experience noise and vibration disturbance however it is anticipated that the Lowestoft Harbour population is habituated to a degree of noise and vibration due to the operation of the busy harbour</p>	<p>Disturbance from noise and vibration during construction on marine and terrestrial ecology has been considered in the EIA (see Chapter 10 of the ES (Biodiversity, Flora and Fauna)). Behavioural (avoidance) and physiological (barotrauma) impacts on fish and migratory fish have been considered, with a simple transmission loss model used to determine the distances over which impacts may occur, noting that the existing harbour infrastructure will provide some attenuation of noise/vibration effects. Breeding bird (notably Kittiwake), will experience noise and vibration disturbance however it is anticipated that the Lowestoft Harbour population is habituated to a degree of noise and vibration due to the operation of the busy harbour environment. Nevertheless, some nest</p>

Issue/ topic raised	ESC Response (2022)	Current position
	environment. Nevertheless, some nest abandonment is considered a potential impact of the scheme during construction.	abandonment is considered a potential impact of the Scheme during construction.
If migratory fish use the Great Yarmouth route consider access/ egress, timing and cumulative impacts.	Consideration of the effects on migratory fish are included within the emerging EIA. Consideration of relevant projects in relation to cumulative effects have been identified and considered as appropriate.	Consideration of the effects on migratory fish are included within the EIA ((see Chapter 10 of the ES (Biodiversity, Flora and Fauna)). This concludes impacts will be minor adverse. Consideration of relevant projects in relation to cumulative effects have been identified and considered as appropriate in Chapter 17 of the ES (Cumulative Effects).
Increased stress to porpoises, seals, otters and kittiwakes.	<p>The emerging EIA has considered the potential impacts of disturbance and physical injury to harbour porpoise and seals due to underwater noise and vibration as a result of construction works, specifically piling. A simple transmission loss model has been used to determine the distances over which impacts may occur, noting that the existing harbour infrastructure will provide some attenuation of noise/vibration effects.</p> <p>Disturbance to otter in Lake Lothing from marine craft used during construction has been considered, however habituation to the presence of existing marine traffic is anticipated.</p> <p>Disturbance to Kittiwake as a result of noise, vibration and presence of construction</p>	<p>Chapter 10 of the ES (Biodiversity, Flora and Fauna)) has considered the potential impacts of disturbance and physical injury to harbour porpoise and seals due to underwater noise and vibration as a result of construction works, specifically piling. A simple transmission loss model has been used to determine the distances over which impacts may occur, noting that the existing harbour infrastructure will provide some attenuation of noise/vibration effects.</p> <p>Disturbance to otter in Lake Lothing from marine craft used during construction has been considered, however habituation to the presence of existing marine traffic is anticipated.</p> <p>Disturbance to Kittiwake as a result of noise, vibration and presence of construction workers and machinery has been considered. It is anticipated that the Lowestoft Harbour population is habituated to a degree of noise and</p>

Issue/ topic raised	ESC Response (2022)	Current position
	workers and machinery has been considered. It is anticipated that the Lowestoft Harbour population is habituated to a degree of noise and vibration and human activity, due to the operation of the busy harbour environment. Nevertheless, some nest abandonment is considered a potential impact of the scheme during construction.	vibration and human activity, due to the operation of the busy harbour environment. Nevertheless, some nest abandonment is considered a potential impact of the scheme during construction.
Consider the likelihood of having to disturb Kittiwakes nesting on the mitre gates and other sub-aerial asset elements (despite the spiked design and two weekly maintenance ops).	Kittiwake nesting on the mitre gates and other elements will be considered in the emerging EIA. Alternative nesting resource will be reviewed as part of the EIA, it is anticipated that use of this facility will potentially reduce the likelihood of kittiwake nesting on other areas of the proposed barrier.	Kittiwake nesting on the mitre gates and other elements is considered in Chapter 10 of the ES (Biodiversity, Flora and Fauna), With alternative nesting included as mitigation, it is anticipated that use of this facility will potentially reduce the likelihood of kittiwake nesting on other areas of the proposed barrier.
Water quality – will this be impacted by dredging? Including bathing / Blue Flag application implications.	The emerging EIA identifies that dredging and excavations present a potential impact to water quality, by increasing suspended sediment in the main channel. This will only be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. There is also the potential to affect dissolved oxygen concentrations, although it should be noted that most of the	Chapter 12 of the ES (Water, Geomorphology and Ground Conditions) identifies that dredging and excavations present a potential impact to water quality, by increasing suspended sediment in the main channel. This will only be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. There is also the potential to affect dissolved oxygen concentrations, although it should be noted that most of the sediment will be removed from the water column.

Issue/ topic raised	ESC Response (2022)	Current position
	sediment will be removed from the water column.	
Air quality – any issues for children/ families using fountains/ South Pier – rise in air pollution from increased traffic.	<p>Potential air quality impacts due to emissions from construction traffic have been scoped out of the EIA. Based on predicted construction traffic flows associated with the scheme, the number of construction traffic vehicles is below the screening criteria for identifying roads where there is the potential for a significant effect on local air quality.</p> <p>The impact of dust emissions generated during construction on human health has been scoped into the EIA, with the conclusion reached that all phases of the scheme are likely to give rise to negligible to low risks to human health.</p>	<p>Potential air quality impacts due to emissions from construction traffic have been scoped out of the EIA. Based on predicted construction traffic flows associated with the scheme, the number of construction traffic vehicles is below the screening criteria for identifying roads where there is the potential for a significant effect on local air quality.</p> <p>The impact of dust emissions generated during construction on human health has been scoped into the EIA, with the conclusion reached that all phases of the scheme are likely to give rise to negligible to low risks to human health (see Chapter 16 of the ES (Air Quality and Climate)).</p>
Water temperature – monitoring requirement stipulated by MMO and CEFAS.	Comment noted. To be discussed with MMO as necessary, during marine licence application process.	Project engaging with MMO and CEFAS on their requirements.
Impacts of sedimentation from dredging / piling - cause drafts around berths? Bury benthic fauna?	The emerging EIA identifies that sedimentation impacts from dredging / piling will largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to	Chapter 12 of the ES (Water, Geomorphology and Ground Conditions) identifies that sedimentation impacts from dredging / piling will largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment

Issue/ topic raised	ESC Response (2022)	Current position
	be localised. Any impacts on berths in the Yacht Basin, Trawl Basin or in the Inner Harbour will likely be negligible.	plumes is expected to be localised. Any impacts on berths in the Yacht Basin, Trawl Basin or in the Inner Harbour will likely be negligible.
Will silt move in East side of yacht basin to a position that could cause difficulty for small vessels?	The emerging EIA identifies that sedimentation impacts with largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. Any impacts in the Yacht Basin will likely be negligible.	Chapter 12 of the ES (Water, Geomorphology and Ground Conditions) identifies that sedimentation impacts with largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. Any impacts in the Yacht Basin will likely be negligible.
High sediment loads can damage engine cooling systems and also impact the sensitivity of depth sounding electronic equipment. Additional dredging requirements will increase sediment loads.	The emerging EIA identifies that sedimentation impacts with largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised.	Chapter 12 of the ES (Water, Geomorphology and Ground Conditions) identifies that sedimentation impacts with largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised.

Table 14: Navigation

Issue/ topic raised	ESC Response (2022)	Current position
Concern on impacts of piling on season (May/ June) for the leisure vessels and	We plan to provide a monthly update including planned closure/possession dates. The	The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation).

Issue/ topic raised	ESC Response (2022)	Current position
businesses – need as much notice as possible.	initial possession/closures windows will be scheduled three months prior to the possession/closure.	We plan to give weekly update with a two week lookahead.
Heritage Quay – will it remain operational including the diesel berth? Will Excelsior and other vessels need to moor elsewhere?	ESC to understand requirements from stakeholders and agree mitigation.	The impacts of the Scheme on Navigation (including Heritage Quay users) have been assessed in Chapter 15 of the ES (Navigation). Heritage Quay users will be consulted ahead of any planned construction works.
CEFAS Endeavour Survey vessel moored in inner harbour – has advanced schedule of movements which will be affected. Advance notice needed.	We plan to provide a monthly update including planned closure/possession dates. The initial possession/closures windows will be scheduled three months prior to the possession/closure.	The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation), with advanced notice identified as key mitigation. In addition, we plan to give weekly update with a two week lookahead.
Closures to channel – some businesses cannot manage more than 24-hour closure – may need to relocate to fulfil obligations.	ESC to understand requirements from stakeholders and agree mitigation.	The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation). We will provide a three month lookahead for major channel closures and provide a weekly update with a two week lookahead.
RNLI will have access at all times, may need boat in Lake Lothing to mitigate potential impact during construction on access.	ESC to understand requirements from stakeholders and agree mitigation.	The impacts of the Scheme on the RNLI's operations have been assessed in Chapter 15 of the ES (Navigation). Mitigation has been identified including provision of slipway access to Lake Lothing during the periods when channel closures of the Inner Harbour Entrance Channel are in place.

Issue/ topic raised	ESC Response (2022)	Current position
<p>Mutford Lock currently only access to Broads – need to ensure both sides of Broads not closed at same time. Liaise with Broads authority.</p>	<p>ESC to understand requirements from stakeholders and agree mitigation.</p>	<p>The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation). Consultation with the Broads Authority regarding the planning of Inner Harbour Entrance Channel closures has been identified as mitigation.</p>
<p>Fishermen access – how will they be affected? – possible temporary loss of manoeuvring, fuelling or storage space.</p>	<p>ESC to understand requirements from stakeholders and agree mitigation.</p>	<p>The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation). Consultation with affected users of the Inner and Outer Harbours to communicate scheduling of channel closures will be required.</p>
<p>Amenity/pleasure vessels will need to be evacuated at certain times during the construction i.e., for concrete pours.</p>	<p>We plan to provide a monthly update including planned closure/possession dates. The initial possession/closures windows will be scheduled three months prior to the possession/closure.</p>	<p>The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation). We will provide a three month lookahead for major channel closures and provide a weekly update with a two week lookahead.</p>
<p>MMO – Marine Plans must be consulted as there are policies pertaining to temporary closures, fish, port and shipping, tourism and social/ recreation.</p>	<p>Noted.</p>	<p>Relevant policies of the Eastern Inshore Marine Plan have been considered in Chapter 3 of the ES (Legislation and Planning Policy).</p>
<p>Advance notice of channel closure timing and duration could be given (12 weeks minimum), with a monthly update and flow of information.</p>	<p>Noted.</p>	<p>We will provide a three month lookahead for major channel closures and provide a weekly update with a two week lookahead.</p>

Issue/ topic raised	ESC Response (2022)	Current position
For long closures – make note in Reeds Almanac. For all closures, notice to mariners.	We plan to provide a monthly update including planned closure/possession dates. The initial possession/closures windows will be scheduled three months prior to the possession/closure.	The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation), with notice to mariners identified as key mitigation. We will provide a three month lookahead for major channel closures and provide a weekly update with a two week lookahead.
Concern on impacts of piling on season (May/ June) for the leisure vessels and businesses – need as much notice as possible	We plan to provide a monthly update including planned closure/possession dates. The initial possession/closures windows will be scheduled three months prior to the possession/closure.	The impacts of the Scheme on Navigation have been assessed in Chapter 15 of the ES (Navigation). We will provide a three month lookahead for major channel closures and provide a weekly update with a two week lookahead.
Overnight closures preferable to daytime.	We plan to provide a monthly update including planned closure/possession dates. The initial possession/closures windows will be scheduled three months prior to the possession/closure.	<p>The approach to the scheduling of closures will be optimised where feasible and will balance the need to minimise disruption to the Inner Harbour Entrance channel with the need to limit significant levels of construction noise and vibration and other disruption at night. We will provide a three month lookahead for major channel closures and provide a weekly update with a two week lookahead.</p> <p>Closure of the barrier during operation will be scheduled to minimise disruption to navigation.</p>

Table 15: Operation and Maintenance

Issue/ topic raised	ESC Response (2022)	Current position
<p>What impact will shopping trolleys and other dumped material have in terms of barrier getting stuck or them being retrieved?</p>	<p>The tidal barrier will be located in an area of the navigation channel that is currently dredged by ABP on a regular basis and is adjacent to land that is currently secured by ABP and RNSYC. There is unlikely to be a risk</p>	<p>The tidal barrier will be located in an area of the navigation channel that is currently dredged by ABP on a regular basis and is adjacent to land that is currently secured by ABP and RNSYC. There is unlikely to be a risk</p>
<p>Several boat-based businesses in the harbour which would be impacted by closures- possible to get consensus on times of least impact?</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>
<p>Night closures of the channels/roads may be preferable for businesses and local commercial operations but would not be suitable for the project.</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>
<p>Possible problems with docking when maintenance in place/closures. Manageable if known.</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>

Issue/ topic raised	ESC Response (2022)	Current position
<p>The annual schedule of routine maintenance and barrier operations should be published well in advance – with caveat about having to change O&M plans due to weather constraints. This schedule of annual and biweekly ops should be made publicly available</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>
<p>In the case of any prolonged (multiday) closures of the inner harbour, active working vessels will need a temporary berth in the outer harbour- this needs to be planned and organised well in advance. Space for any vessels needing an emergency berth should still be available.</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>
<p>RNSYC/ public/ pedestrian access to the barrier needs to be controlled during O&M. Usual access will be closed during ops- how will this be managed?</p>	<p>This is to be considered during the project development</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>
<p>Public interest in watching the barrier in action could result in people stopping on the Bascule bridge to watch the O&M procedure- H&S implications – designated public viewing area and site boards?</p>	<p>This is to be considered during the project development</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>

Issue/ topic raised	ESC Response (2022)	Current position
<p>Long duration of closure during the day would result in a downward footfall but this could overcome if the closures only take place at night.</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes</p>	<p>Ongoing discussions with local businesses as part of our stakeholder engagement will help inform the barrier operation plan.</p>

Table 16: Other

Issue/ topic raised	ESC Response (2022)	Current position
Take learning from Gull Wing engagement – going above and beyond during construction. Personal visits. (contractor led)	Current engagement is via ESC. However, Gull Wing benchmark is noted.	Contractor will be working under the considerate contractor scheme and engagement with businesses and stakeholder will be expected.
How will community react to increased traffic? Risk of protest.	Traffic impact is envisaged to be minimal. ESC to explore the risk of protest(s).	Impacts on traffic (severance & delay) are assessed in Chapter 14 of the ES and conclude that these impacts will be minor adverse. Risk of protest during construction is noted and will be added to risk register.
Delegates desired more information about the Kittiwake breeding platform installation (currently under NDA) as compensation for disturbance by LEEF project – are these tried and tested?	The Kittiwake breeding platform is being developed in consultation with ABP. Further details can be shared when available	ESC are not the developer of the LEEF Scheme. Impacts on kittiwake as a result of the tidal barrier are considered in Chapter 10 of the ES (Biodiversity, Flora and Fauna).
Labour issues/ material availability	Noted.	Noted.
Blue Light responder - Site security – would like details of site security of compound/ machinery. Bridge climbers need negotiators – concern re. access restrictions	Main commercial Road compound is located in ABP commercial property (as per the Tidal Walls current compound). To date, minimal security by the contractor has been required. Bridge climbers - ESC to respond.	Noted, The project will engage with blue light responders throughout.

SCHEDULE 3

STAKEHOLDER ENGAGEMENT: FEEDBACK RECEIVED

Comments raised by members of the public between formal consultation stages

In addition to the seven main phases of public consultation, from strategy development and options appraisal (2016) through to final formal consultation, the project team has been open to ongoing conversations with members of the public, businesses, key and statutory stakeholders through informal channels in between the main stages of consultation and throughout project development. Those conversations have also supported the development of the project communications and engagement database, helping to ensure that any updates are reaching as many people as possible.

For example, the team has actively encouraged comments and questions to be submitted outside of formal consultation periods, through the project email address and, when the virtual engagement room was launched in May 2021, through the live questions and comments option.

As a public authority, members of the public may use a more formal route to raise concerns. This can be done by requesting a response through the Freedom of Information Act 2000.

The table below shows the requests received over the current lifetime of the project (2015 to 2023). In addition to those requests shown below, a further two requests have been received where further clarification has been sought from ESC's Freedom of Information (**FOI**) team but has not been provided at this time.

All FOI requests have been resolved to date without the need for a formal inquiry.

Table 9: Freedom of Information requests

Question outline	Response	Outcome
Requesting current versions of the project plan and budget of the Lowestoft flood defence project	Directed to information housed on the Project website and virtual visitor centre	Resolved
Information requested about communications with a specific business	Information that could be provided under the Act was given. Where this was not possible, this was explained.	Resolved
Information requested about the amount of money and financial benefits that the Project had agreed to pay to Associated British Ports as part of the costs of the Lowestoft Flood Risk Project.	Confirmation that ESC have not made any agreement with Associated British Ports to pay money or financial benefit as part of the costs to the Lowestoft Flood Risk Management. Project.	Resolved

Question outline	Response	Outcome
Whether the Council has any planned for Managed Retreat in this and other areas.	Confirmed no plans in this or other areas. Adaptation plan provided for Easton Barents	Resolved
What plans the Council has to allow homes to be built in medium and high flood risk zones.	Spreadsheet provided, linking to guidance and process, procedure and mitigation actions required for those seeking to build/develop homes in flood risk zones	Resolved

In all cases the project team has sought to provide open and honest information about the Scheme.

LFP and to explain the rationale for key decisions. Many of the issues raised in this way sought further information or reflected a viewpoint based on a misunderstanding of key information. In some cases, responses provided helped to clear these issues up. In other cases, there remained a difference of opinion between the commentator and the project team.

The table below provides a summary of the activities and responses included in **Appendix 1 (Engagement log)**. Engagement about the Scheme began in 2015. The engagement log is long and comprehensive. The table below summarises, for ease, the main issues and activities during that timeframe.

Table 10: Issues and activities log

Activity	Date	Purpose	What was achieved?
Lowestoft Rising Community Event	11/02/2015	Initial introduction to the project.	Over one hundred visitors to the event who had an early opportunity to be introduced to the project.
Email	15/05/2016	Draft of consultation materials by email for comment to business advisory group.	To ensure that the consultation materials were fit for purpose and to gather independent views to help them to be developed.
Public Consultation	06/06/2016 - 29/07/2016	Introduction to the Lowestoft Flood Risk Management Strategy and to demonstrate links to the Gorleston to Lowestoft Coastal Strategy.	Opportunity for the community and businesses to make early comment.

Activity	Date	Purpose	What was achieved?
		Drop ins on 20th and 21st June.	
Lowestoft Fayre	17/03/2017 - 18/03/2017	Introduction to all projects and initiatives happening or planned for in Lowestoft.	Good engagement and information promoted.
Consultation period on four aspects: Fluvial / pluvial, Tidal, Environmental aspects of tidal, and views from river users.	30/10/2017 - 14/12/2017	Initial options appraisal. Setting out options considered, withdrawn and the reasoning behind this. Comments requested on information shared, to stakeholder data base, through local papers, social media.	Comments received largely supportive of the approach.
Workshop	01/11/2017	To explore the options appraisal and environmental concerns. Comments requested on information shared, to stakeholder data base, through local papers, social media.	Comments received largely supportive of the approach.
Project Open Day	30/11/2017	To set out options appraised and strategy progress. Format followed was a mix of formal presentation and Q&A and informal drop in style engagement. Comments requested on information shared, to stakeholder data base, through local papers, social media.	Comments received largely supportive of the approach.

Activity	Date	Purpose	What was achieved?
Public Meetings (virtual)	04/05/2021 06/05/2021 10/05/2021	Update on the project for the public to begin to bring out any concerns.	Concerns recorded; attendees added to contact database for future engagement.
Tidal Flood Walls Ground Breaking (In person and live streamed)	21/05/2021	Tidal Flood Walls Ground Breaking (In person and live streamed)	Coverage in local newspapers. EADT / EDP / Lowestoft Journal and across social media. In person engagement with 30 key stakeholders on site due to COVID restrictions. Over 140 people joined the event through the live-streaming provision. Coverage included mention of the full project objectives, including tidal barrier.
Virtual Visitor Centre Launched	24/05/2021	Virtual Visitor Centre Launched.	Launched due to restricted rules (COVID 19) to allow multiple people to learn about the project, receive updates, and leave comments and questions. This form of basic gaming technology has allowed the project to reach age ranges that have previously proved challenging. Analytics are used to help continue to shape the virtual room. Will be updated throughout the project.
Virtual Visitor Centre Query	21/06/2021	“How will the defences at Lowestoft affect the river Waveney and likelihood, frequency and impacts of flooding upstream?”	Directed to flood risk assessment, clarified the project will have no influence on flooding in Bungay.
Virtual Visitor Centre Query	22/06/2021	“How will the defences at Lowestoft affect the river Waveney and likelihood, frequency and impacts of flooding upstream?”	Response sent 22/06/ 2021: “As part of the planning application process a Flood Risk Assessment was undertaken, which found the project will not increase flood risk upstream of the scheme. The project will not have any

Activity	Date	Purpose	What was achieved?
			influence on the flood risk in Bungay. The Flood Risk Assessment can be found at the planning portal under "supporting documents"
Virtual Visitor Centre Query	10/07/2021	"I have noticed through observing the Environment Agency tidal buoy at Lowestoft that wave heights have been very high this week. I believe wave heights reached 6.83 metres at one point. Is this indicative of an increase in wave heights and tidal velocities in the Lowestoft area?"	Response sent 26/10/2021: "Thank you for your message. Details of the coastal management strategies for the Lowestoft area can be found in the Gorleston to Lowestoft Coastal Strategy."
Virtual Visitor Centre Query	12/02/2022	"Hi, one question, where will the water go that is deflected by the barrier. What other flood are at risk as a result of that?"	Response confirming there would be no increased flood risk and added flood risk assessment to the Virtual Consultation Room.
Meeting	26/07/2022	Represented LFP at the Lowestoft Ambassadors meeting.	Regen team now have footfall counters in place - may be useful data for funding. Opportunity for volunteering/ social value with Warm Rooms. Potential construction on Station Square.
Email	21/09/2022	Email Invite to 21/10 workshop.	Sent to members of the Key Stakeholder Group as hosts, separate invite sent to list of stakeholders identified. Invite sent to Peter Langford who raised at Suffolk Resilience Forum meeting to ensure attendance of blue light responders, Suffolk Highways and National Highways.

Activity	Date	Purpose	What was achieved?
Email	29/09/2022	Chase email invite to 21/10 workshop.	Individual chase emails to invite to 21/10 workshop - increase in RSVPs.
Letter	11/10/2022	Letter invites for 21/10 workshop.	Letter invites to stakeholders identified as landowners/ tenants of land packages impacted by barrier.
Email	14/10/2022	Final chase email invite to 21/10 workshop.	Individual chase emails to invite to 21/10 workshop - increase in RSVPs.
Workshop	21/10/2022	Key Stakeholder Workshop aiming to draw out concerns and impacts from Key Stakeholders relating to the EIA, NIA, barrier construction, operation, and maintenance.	Concerns across a range of topics drawn out and distilled for Project Team to respond to. Attendance from range of stakeholders including navigation users, Schedule 5 and 6 consultees and blue light responders.
Letter	16/11/2022	Letter invite for consultation and drop in events to residents/ businesses potentially impacted by the tidal barrier construction.	Letter sent to addresses on Waveney Road, Pier Terrace, Marine Parade, London Road South and landowners identified in the land packages document.
Email	16/11/2022	Notes and presentation from Key Stakeholder Workshop (21/10) distributed.	Briefing sent to ESC councillors, Strategic Steering Group and Key Stakeholder Group.
Email Briefing	18/11/2022	Briefing for councillors and members of LFP governance structure to make aware of consultation to share with their networks.	Briefing sent to ESC councillors, Strategic Steering Group and Key Stakeholder Group.

Activity	Date	Purpose	What was achieved?
Consultation	21/11/2022 - 12/01/2023	Consultation to draw out impacts/ concerns from stakeholders and community around the construction, operation and maintenance of the tidal barrier. Materials available to view on the virtual engagement room, Riverside, Marina Centre and Library.	13 surveys completed by stakeholder, underrepresented groups identified, and further consultation organised.
Email	21/11/2022	Email inviting database to view consultation materials and attend drop-ins.	Email sent to LFP stakeholder database.
Drop-in Sessions	23/11/2022 - 24/11/2022	Drop-in sessions for public and stakeholders to find out more about the barrier, view consultation materials and answer any questions.	42 people attended over the two sessions. Concerns around adverse weather affecting attendance – further consultation with underrepresented groups planned.
Business Engagement	28/11/2022	The purpose of the outreach was to discuss the project with local business owners and share the consultation paper with those who are close to the construction area and might be impacted by the building works.	Covered: Station Square, Bevan Street East (Part), East end of Commercial Road, A47 on the North side of the Harbour/Trawl Dock, Denmark Road (nearest station square). Project team discussed with the business owners, which were open, the nature of the works, providing them with the booklet for reference and encouraged them to provide feedback on the TWAO. Directed any specific concerns to email the team and someone would be in touch to discuss the concerns. Where businesses were closed, copy of the booklet posted though the door, distributing approximately 50 booklets.

Activity	Date	Purpose	What was achieved?
Email	05/12/2022	Email asking to share consultation materials with contacts, including property/landowners in Lowestoft.	The Oulton Broad Yacht Station Manager got in touch to be added to the stakeholder database.
Email	06/12/2022	Ensure those on the project stakeholder database has received information regarding the consultation.	Email to each person on stakeholder database with booklet, virtual engagement room link and survey.
Email	06/12/2022	Email to Eastern IFCA to organise meeting with fishermen/ fishing businesses re. tidal barrier consultation.	IFCA provided the project with contact details for the Lowestoft Inshore Fishing Fleet Association.
Booklet Delivery	06/12/2022	ESC dropped off some booklets and a poster to the Taylor's Properties office for display.	Poster displayed in Taylors Properties on Waveney Road (A47).
Letter / Booklet Delivery	08/12/2022	Ensure residents in the immediate vicinity to the barrier construction have engaged with the consultation and are aware of potential impacts during construction.	Letters, booklets and surveys sent to addresses in the immediate vicinity of the barrier location (Waveney Road, Station Square, Marine Parade, London Road South, Pier Terrace).
Email	16/12/2022	Request from Lowestoft Cruising Club to share consultation booklet to share with members.	Shared booklet, linked to survey and offered to provide paper copies of survey if needed.
Email	05/01/2023	Post-Christmas email regarding consultation.	Email sent via Mailchimp to the stakeholder database.

Activity	Date	Purpose	What was achieved?
Radio	09/01/2023	Final push for consultation.	Info regarding consultation added to the East Coast One radio bulletins.
Email	13/01/2023	Email from individual with additional comment on the consultation.	Additional comment: "it is (still) important to ensure that "backflow" is prevented on all drainage ("combined" or "otherwise") from road gullies (and "basements") in the event that the water level in "Lake" Lothing (or MORE importantly "seaward" of the "proposed" barrier - if that is where ANY discharge to) rises above "inlet" levels."
Email	22/02/2023	Communication regarding change to TWAO Location Plan and increased length of channel closures to 4-5 x 3-week channel closures. Offered to meet with anyone concerned and/or felt they would be impacted.	Sent to the project stakeholder database.

SCHEDULE 4

FURTHER ENGAGEMENT WITH NAVIGATION USERS

The table below summarises the engagement undertaken with navigation users following the Navigation Users' Workshops in January and February 2023.

Table 18: Summary of Navigation Users' engagement

Navigation User	Date	Purpose of engagement	What was achieved?
Lowestoft Inshore Fishing Fleet Association	24/01/2023	Engage the Lowestoft Inshore Fishing Fleet Association with the barrier and any impacts.	Will reach out to colleagues based in the Inner harbour who will be impacted by channel closure. Negligible impact from barrier works on themselves, will remain on contact database.
Royal Yachting Association, Norfolk and Suffolk Boating Association, Oulton Broad Parish Councillor	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	Highlighted the importance of ensuring channel closure does not coincide with Yarmouth closure, advised private boat users are largely seasonal.
Excelsior Trust	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	Highlighted Trust takes bookings for the following season in the October prior, so as much notice as possible. The ship needs to pass through the channel once in March and once in November. Important not to miss/ be delayed in November as vital maintenance works take place to ensure the ship can continue to run.

Navigation User	Date	Purpose of engagement	What was achieved?
Oulton Broad Water Sports Centre	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	Occasionally requires navigation of the channel. Any channel closures will need communicating with as much notice as possible.
Mutford Lock	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	<p>Advised most traffic through the Lock does not go out to sea.</p> <p>Advised navigation users in Brundle (Broadland Cruising Club), Broom, the Norfolk Yacht Agency, DNR Marine and Broadlands Holiday Park will need engaging.</p>
SMS Marine	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	<p>Concerned about loss of business during the channel closures. They have big lead times so will need to know when closures will happen with as much notice as possible.</p> <p>Mentioned having the closures over weekends will help trade.</p> <p>Interested in becoming a subcontractor on the project.</p> <p>Discussed moving some of their operations to the outer harbour during closures.</p>
Sheader Marine/ Lowestoft Yacht Services	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	<p>Largely supportive of the project and pragmatic around any closures, doesn't think channel closures/ change to navigation will have a big impact.</p> <p>Highlighted the importance of good communication when it comes to warning of the channel closures.</p>

Navigation User	Date	Purpose of engagement	What was achieved?
			Mentioned the current difficulty of exiting the Broads via Great Yarmouth and potential issues if the channel is closed at the same time as Great Yarmouth being blocked.
Broads Authority	09/02/2023	Navigation user consultation re. increased potential channel closures to 4-5 x 3-week durations.	<p>Outlined the current challenges with Great Yarmouth and that everything currently goes in and out via Mutford Lock. Hopeful the Haven Bridge will be sorted in the next few months, Braden Bridge more complex, but the Haven is the lower bridge.</p> <p>Highlighted the importance of being able to get through Great Yarmouth during the 3-week closure.</p> <p>Outlined key locations for bigger boatyards in the Broads who might be affected by channel closures – offered to share details. Happy to share information relating to closures to Broads users, mentioned these communications will need to be clear and straightforward (suggested maps with arrows) as some of the users are not experienced mariners.</p> <p>Broads Ecology team would like sight of the EIA.</p>

SCHEDULE 5

RESPONSES TO NOVEMBER 2022 CONSULTATION

The table below shows the responses to the consultation which ran from 21 November 2022 – 12 January 2023.

Table 17: Public Consultation Responses (November 2022)

Consultee	Comment	Response (2022)
Lowestoft Cruising Club	Some disruption while transiting the bridge channel. Significant disruption while on the waiting pontoon in the Trawl Dock and in the Royal Norfolk and Suffolk Yacht Club (RNSYC), particularly if piling is 24/7.	There will be piling during the course of the project, and this will cause noise and vibration. But this is limited to a period of approximately two months, spread out over a nine-month period.
	Minor impact while transiting the bridge channel. Some disruption while on the waiting pontoon in the Trawl Dock and in the Royal Norfolk and Suffolk Yacht Club (RNSYC), particularly if piling is 24/7.	There will be piling during the course of the project, and this will cause noise and vibration. But this is limited to a period of approximately two months, spread out over a nine-month period.
	Any closure of the bridge channel will have significant impacts on the activities of boats wishing to transit the bascule bridge in either direction. There are over 400 vessel berths at the western end of Lake Lothing. Lowestoft Cruising Club has 73 serviced pontoon vessel berths, an overwintering boat compound, vessel slipway and mast crane, and a clubhouse. Our 130 members actively cruise the East Coast and further afield in sailing and motor yachts out of Lowestoft harbour. We also host visiting yachts throughout the year. When construction was initially planned for the winter months impacts on our sailing activities were thought to be minimal, as most of our activity is from March to October. All year working, including summer months, means significant adverse impacts are guaranteed. Lowestoft is a refuge port in times of adverse weather conditions and safe berthing would be required in the outer harbour. Berthing capacity in the RNSYC will be significantly reduced.	Follow up meeting took place with Lowestoft Cruising Club to discuss their concerns and mitigate against the impact of channel closures where possible. Proposed berths at the RNSYC to be used by Lowestoft Cruising Club during times of closure.

Consultee	Comment	Response (2022)
	<p>Significant temporary additional small boat berthing in the outer harbour, with access to the quay, is essential during closures for both visiting and local vessels. Visiting vessels will need well publicised advance notice of closures so they can plan, if necessary, to avoid visiting Lowestoft. Access to the RNSYC refuelling berth should be maintained. Access to the Broads via Mutford Lock would be restricted, particularly if there are closures at the only other access in Great Yarmouth. Advance warning of closures should be given at a minimum of 12 weeks / 3 months' notice. Such plans should be widely promulgated via Notices to Mariners, a dedicated website, and via social media.</p>	
	<p>High sediment loads can damage engine cooling systems and also impact the sensitivity of depth sounding electronic equipment. Additional dredging requirements will increase sediment loads.</p>	<p>The emerging EIA identifies that sedimentation impacts with largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised.</p>
	<p>There needs to be a risk assessment of the safety issues for vessels transiting the ongoing construction works. Clear VHF radio communication should be established. Specific safety navigation instructions for boaters should be widely promulgated via Notices to Mariners, a dedicated website, and via social media.</p>	<p>Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).</p>
	<p>The contractors should be tasked to minimise disruption to navigation wherever possible and maintain strict safety standards for passing vessels.</p>	<p>Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).</p>

Consultee	Comment	Response (2022)
	<p>Any closure of the bridge channel will have significant impacts on the activities of boats wishing to transit the bascule bridge in either direction. There are over 400 vessel berths at the western end of Lake Lothing. Access to sea and return to moorings would be significantly curtailed. (See question 3 for more details.)</p>	<p>Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).</p>
	<p>Advance warning of planned closures should be given at a minimum of 12 weeks / 3 months notice. Such plans should be widely promulgated via Notices to Mariners, a dedicated website, and via social media. (See question 3). Closures for tidal surges should be at a minimum of 5 days' notice.</p>	<p>This is part of the ongoing conversations with ABP, RNSYC and other navigation channel users and will be incorporated in the Barrier Operation Plan, including necessary communication routes.</p>
	<p>There needs to be a risk assessment of the safety issues for vessels transiting the ongoing construction works. Clear VHF radio communication should be established. Specific safety navigation instructions for boaters should be widely promulgated via Notices to Mariners, a dedicated website, and via social media.</p>	<p>Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).</p>
	<p>The positive impact would be no further flooding and damage during tidal surges at the Lowestoft Cruising Club site.</p>	<p>Support for the Scheme noted.</p>
<p>Individual community member / Lowestoft resident</p>	<p>Piling activities for such large-scale construction works will be very disruptive to local residents in the immediate area. Work scheduling will be crucial to ensure disruption avoids sleeping times.</p>	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But this is limited to a period of approximately two months, spread out over a nine-month period.</p>

Consultee	Comment	Response (2022)
	Many of the harbour structures are Victorian era, these could be very vulnerable to vibration effects	Surveys will be completed on buildings in advance of piling work. During periods of piling monitors will be placed in nearby buildings to ensure vibration remains inside specified safe levels.
	Agitation of sediments will be detrimental to water quality and will need to be carefully managed and mitigated	The emerging EIA identifies that sedimentation impacts with largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. Any impacts in the Yacht Basin will likely be negligible.
	Spoil disposal from demolitions of old pier structures	Noted.
	These will have been covered within the NavSim and NRA process.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).
	Disruption to vessel traffic can be mitigated by advance notice and the provision of alternative berths on a temporary basis.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).
	Business disruption from marine traffic delays will be less than that caused by significant tidal flooding	Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).
Anonymous	Disruption to everyday lives but no pain - no gain!	Support for the Scheme noted.

Consultee	Comment	Response (2022)
	Overnight closures preferable to daytime.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and reported as part of the ES (application document A17).
	We're a port town so our water is not perfect anyway.	No response required.
	Some disruption but wildlife is pretty resilient.	No response required.
	Mental health and wellbeing.	Noted. The feedback provided has fed into the assessment of impacts on population and human health undertaken and reported as part of the ES (application document A17).
Individual community member / Lowestoft resident	Navigation disruption - No provided that Bridge could still be used for Cars	During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.
	Benefit - Properties not being flooded	Support for the Scheme noted.
MJ Training (Business)	My business is based by the harbour, delivering training could be an issue if there is continuous noise.	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But this is limited to a period of approximately two months, spread out over a nine-month period.</p>

Consultee	Comment	Response (2022)
	The building are old, my concern would be any issue with regards to the buildings and vibration	Surveys will be completed on buildings in advance of piling work. During periods of piling monitors will be placed in nearby buildings to ensure vibration remains inside specified safe levels.
	There is obviously concerns for the shipping businesses in the area, not sure if there would be any significant impact on my business based on the end of Commercial Road. I would be interested to know more.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and reported as part of the ES (application document A17).
	I would be concerned for the town and beach water quality and the impact this could have on tourism for the town.	The emerging EIA identifies that dredging and excavations present a potential impact to water quality, by increasing suspended sediment in the main channel. This will only be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. There is also the potential to affect dissolved oxygen concentrations, although it should be noted that most of the sediment will be removed from the water column.
	I assume all efforts would be made to ensure the safety, replanting etc. here.	Noted. The feedback provided has fed into the assessment undertaken and reported as part of the ES (application document A17).
	Long term would there be any issues environmentally? Would this solve the problem of flooding from all aspects, sea, river and rainfall, to make the disruption and impacts on the environment worthwhile?	The proposed tidal barrier will reduce the risk of tidal flooding to the town of Lowestoft. The likelihood of significant environmental effects arising of the proposals has been considered in the context of the EIA undertaken and reported in the ES. It is considered that the benefits to be realised by the proposed tidal barrier outweigh any adverse effects and for this reason

Consultee	Comment	Response (2022)
		consent is being sought for the proposed Scheme.
	Will this change the overall use of the harbour after the construction is finished? I.e would the same size vessels still be able to access the harbour?	The 40 metre mitre gate will allow the navigation channel width to be unchanged upon completion, allowing the same sized vessels to use the harbour.
	How long would this really take, will we have a breakdown of events beforehand.	A programme will be put together in advance of construction start. This will be communicated, with known periods of channel closures and piling works.
	Are we talking about overnight closures as per the current closures for the bridge? If so this will not affect my business.	During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.
	We would only need prior notice if closing during the day. Then we would need at least a week, to advise clients on how to get to us and parking advice via any diversions.	During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.

Consultee	Comment	Response (2022)
	<p>Would regular closure result in a change in water quality? If so how badly and will it affect drainage and beach water quality?</p>	<p>The emerging EIA identifies that dredging and excavations present a potential impact to water quality, by increasing suspended sediment in the main channel. This will only be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. There is also the potential to affect dissolved oxygen concentrations, although it should be noted that most of the sediment will be removed from the water column.</p>
	<p>Again would this have an effect on wildlife etc., if so what plans do you have in mind to minimise this?</p>	<p>The emerging EIA identifies that sedimentation impacts from dredging / piling will largely be confined to the Inner Harbour Entrance Channel. The greatest impact will be from dredging which will be temporary and scheduled to take place near high water when tidal flows are weak and therefore transport of sediment plumes is expected to be localised. Any impacts on berths in the Yacht Basin, Trawl Basin or in the Inner Harbour will likely be negligible.</p>
	<p>Would this impact on tourism, getting in and out of the town, beaches etc.?</p>	<p>During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.</p>

Consultee	Comment	Response (2022)
	Thinking of on land not getting into the harbour itself, what kind of diversions will be required and for how long?	During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.
	We are assuming this is required due to the change in climate and the higher chance of flooding occurring, if so we will have to accept some impact from the build and operation. However we will need more information as to how significant that could be.	Noted. Further information on the need for the Scheme has been set out within the Statement of Aims (application document A4) that accompanies the application.
Anonymous	nothing to worry about - its a construction project so you'll be working to "considerate constructor" standards or similar...	No response required.
Anonymous	The design sucks. An opportunity missed time and time again in Suffolk is to make stuff look a bit funky/interesting/artistic or even just "not sh!t". Couldn't it be a nice colour not grey? couldn't it have a more nautical theme, some towers or sails or something. it is the main entrance to the harbour, so should shout "welcome". Think "Colossus of Rhodes", or at least some kind of arch. Make it a landmark feature, not an apology.	Noted. The feedback provided has fed into the assessment undertaken and reported as part of the ES (application document A17).
Business Owner	Yachts come into our yard for rigging and maintenance work, with the NTMs we can plan so that boats don't get trapped in the harbour. I forward the NTMs to my berth holders so they can plan trips where they want to leave or return to the harbour.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and reported as part of the ES (application document A17).

Consultee	Comment	Response (2022)
	Having attended the stakeholders meeting I believe that there are the appropriate methods in place to protect the local ecology	Support for the Scheme noted.
	The construction of the barrier is absolutely necessary to protect Lowestoft in the future.	Support for the Scheme noted.
	Other businesses might find forward planning difficult	Noted. The feedback provided has fed into the navigation impact assessment undertaken and reported as part of the ES (application document A17).
	For the main part I believe we will be able to plan around the closures. The main problem would be if a visiting yacht wanted to come in for emergency rigging work	Noted. The feedback provided has fed into the navigation impact assessment undertaken and reported as part of the ES (application document A17).
	Benefits - The prevention of flooding in Lowestoft	Support for the Scheme noted.
Marina Theatre	An impact on operations/audiences at Marina Theatre. Audible in auditorium for audiences. Resulting in complaints, lower attendance & decrease in revenue.	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But this is limited to a period of approximately two months, spread out over a nine-month period.</p>
	Piling will have an impact (already has) on operations/audiences at Marina Theatre. Audible in auditorium for audiences. Resulting in complaints, lower attendance & decrease in revenue. Causing headaches for staff, affecting well-being & work environment, resulting in lower work output & possible increased staff turnover.	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But this is limited to a</p>

Consultee	Comment	Response (2022)
		period of approximately two months, spread out over a nine-month period.
	If the bridge is shut, will affect Marina Theatre audiences & staff getting to/from the theatre. Could result in smaller audiences/increased audience reticence & decrease in revenue.	During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.
	Depends on if bridge/road shut. More than 1 or 2 weeks would affect us.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).
	As much as you can give us. But our programme of shows is booked 12-18+ months in advance so couldn't alter. For audiences, advance notice might help. Or it stop them from booking - hard to know.	Noted. The feedback provided has fed into the navigation impact assessment undertaken and subsequently reported as part of the ES (application document A17).
River User	What will be the mean tidal level inside of the flood defence gate when closed and how will this be maintained.	Although detailed design work has yet to be undertaken further information relating to the design and operation of the new tidal barrier comprised within the Scheme are provided in Chapter 6 of the ES (application document A17).

SCHEDULE 6

RESPONSES TO JUNE 2023 CONSULTATION

The table below shows the responses to the public consultation which ran from 5 June 2023 – 3 July 2023.

Table 19: Public Consultation Responses (June 2023)

Consultee	Comment	ESC Response
River User	With the Bandstand and South Pier tourism area included in this boundary, significant consideration/mitigation needs to be given to the impact this is going to have on tourism, which is a large source of income for many local businesses and a big part of why people visit Lowestoft.	Communication of any anticipated disruption will be shared in advance, with access maintained at all times. Any diversions will be clearly signed.
	Will compensation be offered to vessels/company's/individuals for the additional cost of fuel/time so that vessels can divert via GREAT YARMOUTH and the BROADS NETWORK to get to the other side during the closures?	The impact of closing the navigation channel has been carefully assessed. ESC will work with channel users to, where possible, mitigate the impact of channel closures. Closures will be planned and communicated in advance.
	[Year round working] is good as it means the project will be completed quicker. It is vital this is delivered on schedule.	Support for the proposed construction methodology noted.
	During the construction of the tidal defence walls along the SOUTH PIER, there has been extremely significant disruption to local businesses and charities on the pier and nearby, who rely on general footfall to keep trading. Large and complex systems of heras fencing has been very ugly but more significantly, has prevented people accessing the pier and getting to local businesses. Even though there are routes through, these are extremely poorly signed/highlighted and people are simply not walking down the pier like they used to, causing massive loss of revenues and engagement of local businesses and charities	Communication of any anticipated disruption will be shared in advance, with access maintained at all times. Any diversions will be clearly signed.

Consultee	Comment	ESC Response
	<p>on the pier. When construction of the barrier impacts on the SOUTH PIER / BAND STAND area, it is absolutely vital that fencing/traffic management is kept to an absolute minimum, and where it is absolutely necessary, that fencing/management is simple and low key and for as short time as possible. Additionally clear signage for all local businesses and charities should be provided to reduce the impact that low footfall is going to have on them. Ideally there should be no construction activities or fencing systems set up on the SOUTH PIER / BAND STAND as this is a popular tourist area and consideration for other areas that aren't a direct pedestrian / tourist area should be used instead, such as the grassed areas of ROYAL GREEN and other nearby concrete hard standings such as SOUTH QUAY immediately WEST of the flats on BELVEDERE ROAD, as these areas are low impact, won't stop pedestrians/tourists from accessing key areas and will be out of the way.</p>	
<p>Individual community member/ Lowestoft resident</p>	<p>We need to stop Lowestoft flooding again in the future.</p> <p>The lesser the risk of flooding, the more people would be willing to invest and move to the area.</p> <p>Not concerned about any environmental impact.</p> <p>It is needed ASAP.</p>	<p>Support for the Scheme noted.</p>
<p>Jet Adventures</p>	<p>So far, support for small businesses and charities has been very poor. Unless that improves my only choice would be to object to the construction.</p> <p>As a business it's reducing my confidence in the area.</p> <p>Mitigation needs to consider small businesses</p>	<p>Meetings will be arranged with stakeholders directly impacted by construction to help the project team understand any concerns and work together to find a way forward.</p> <p>The current mooring utilised by your company on the Heritage Quay will remain available for your</p>

Consultee	Comment	ESC Response
	that need passage to survive.	use during the works construction.
	It would be much better for the area to only run the project outside tourism periods	Year-round working will speed up the construction programme, allowing for the work to be completed efficiently. Channel closures will not take place in late July and August to prevent disruption during the school summer holidays.
Individual community member/ Lowestoft resident	Supports the barrier to stop flooding	Support for the Scheme noted.
	Construction impacts - It is what it is	
Individual community member/ Lowestoft resident	It will keep Lots people and property safe from flood.	Support for the Scheme is noted.
	Good and clear advanced warning must be adhered too. Please do not let this be via social media alone, not everyone is on social media or even the internet	Communication of any anticipated disruption will be shared in advance via a variety of channels including letters to residents using electoral roll data and local press.
	Updates and sharing information is necessary along with strictly adhering to the mitigating protocols	
Individual community member/ Lowestoft resident	My biggest concern is over the effect that construction will have on the local road network. Will it force road/footpath closures? It would be a shame to get the third crossing up and running only to be back to square one with only two crossings for periods of time.	The construction methodology has been developed to avoid the use of roads where possible, moving material to the site on the water. There may be some longer bridge openings. These will be known and communicated in advance. There are currently no road closures planned. The location of the site compound will allow project staff to walk or cycle to the construction site, reducing potential increases in traffic.
Anonymous	Even though I am Lowestoft born and bred I	As explained in this report,

Consultee	Comment	ESC Response
	don't know anything about the proposals.	significant consultation has been undertaken on the proposals over many years, commencing in June 2016.
Anonymous	What was the point of the flood defences just carried out. There's not enough businesses to save to fund it.	The tidal flood walls will work in combination with the tidal barrier to provide protection from flooding.
Anonymous	What difference will it make to places along the coastline etc. and inside the broads	<p>The tidal barrier will have no impact along the coast. The volume of water the barrier will prevent from flowing into Lake Lothing is very small in comparison to the volume of the North Sea.</p> <p>Flood risk modelling has been carried out to determine there are no negative impacts of flood risk outside the scheme.</p>
Individual community member/ Lowestoft resident	Does not support the construction as water will come up sewers or by North Denes	<p>Flood modelling completed as part of the scheme took into account the whole area. The flood walls along Hamilton Road reduce the flood risk to the Power Park area significantly. There is an existing risk of overtopping of the existing defences close to the site occupied by Birds Eye. This overtopping is managed through the existing drainage in the area.</p> <p>Sewers are the responsibility of Anglian Water. As part of the scheme, we have identified a number of outflows in the harbour area, most of which have flap valve on them to prevent tidal waters entering into the sewers. The scheme has installed an additional valve as part of the tidal walls construction by Station Square.</p>
	Waste of money	The case for the Scheme is set out

Consultee	Comment	ESC Response
		within the Statement of Aims (application document A4) that accompanies the application.
	If the men worked all day you may hear some noise but always standing about smoking/ vaping or on mobile phones working if they did will take half the time to finish!!!	The proposed working hours have been established having regard to the need to efficiently deliver the Scheme whilst also seeking to mitigate any environmental effects that the construction activities required might give rise to.
	Why take so long work 24 hours	The proposed working hours have been established having regard to the need to efficiently deliver the Scheme whilst also seeking to mitigate any environmental effects that the construction activities required might give rise to.
	Again if they worked (underlined) it would get done quicker and not cost so much. The Chinese would have had it done in half the time	The proposed working hours have been established having regard to the need to efficiently deliver the Scheme whilst also seeking to mitigate any environmental effects that the construction activities required might give rise to.
	The Sea!! Is dirty and polluted are you changing that?	The impacts of the Scheme on the water environment have been considered as part of the EIA undertaken and the results of this assessment are set out in Chapter 12 (Water Environment) of the ES (application document A17).
	Waste of money sure there must be an easier and quicker way to achieve the same	The case for the Scheme is set out within the Statement of Aims (application document A4) that accompanies the application.
	Don't waste money on feedback get the job done	Support for the Scheme is noted.

Consultee	Comment	ESC Response
Individual community member/ Lowestoft resident	Please hurry up & open the footpath across the Bridge its taking the mick How long its been shut considering every time I walk past nothing is being Done	The footpath on Waveney Road, which was closed as part of the tidal flood wall construction works, has now been reopened.
Port Organisation	No concerns.	Noted.
Individual community member/ Lowestoft resident	Supports the tidal barrier as I believe it will reduce the overall risk of flooding. But if there was a severe tidal surge it could still potentially flood.	Extensive flood risk modelling has been carried out, considering the projected impact of climate change, to ensure the tidal barrier will provide protection for the next 100 years.
	I do not think it will decrease or increase investor or business confidence. As other issues like port Authority ABP running the harbour in the way that they do already puts off investors and businesses. And even puts of people using the harbour at Lowestoft in general.	The case for the Scheme is set out within the Statement of Aims (application document A4) that accompanies the application.
	When applying for a transport and works act order (TWAO) everything should be taken into consideration to cause as little impacts as possible. And when construction takes place cause as little disruption as possible. Any permanent land use should be chosen wisely.	Careful consideration has been given to the Scheme proposals to seek to avoid, minimise or mitigate any likely adverse effects. For further information, please see the ES (application document A17).
	Any noise and vibrations that occur during construction will affect people in the area. It should be kept to as little as possible.	Careful consideration has been given to the Scheme proposals to seek to avoid, minimise or mitigate any likely adverse effects. For further information, please see the ES (application document A17).

Consultee	Comment	ESC Response
	<p>Temporary closure of the inner harbour entrance/ bridge channel should be arranged to be closed as least as possible. Or given the best closure to get the best result of that closures. However; the bascule bridge is getting old if it lifts to many times it will just get stuck. It also causes allot of traffic problems when it opens or potentially gets stuck. (ABP) the Port Authority is a rip off and charges people allot of money for bridge lifts and to use the harbour in general. They are very fussy with their procedures. Which is another reason why people do not like using it.</p>	<p>The construction methodology has been developed to avoid the use of roads where possible, moving material to the site on the water. There may be some longer bridge openings. These will be known and communicated in advance.</p> <p>There are currently no road closures planned. The location of the site compound will allow project staff to walk or cycle to the construction site, reducing potential increases in traffic.</p>
	<p>Year-round working is best to speed up the construction process the quicker it is done the better to minimize disruption. But also working around peak times of usage in the harbour. Doing the cheapest option is also best as rising inflation costs and economic climate not being very good at the moment.</p>	<p>Year-round working will speed up the construction programme, allowing for the work to be completed efficiently. Channel closures will not take place in late July and August to prevent disruption during the school summer holidays.</p>
	<p>Environmental impacts of construction will only be temporary. Water quality in recent years at South beach has been affected by sewage discharge into the North Sea as a result the beach lost its blue flag status. Sediment in the outer harbour is sucked clean at regular intervals and ABP carry out dredging regularly. A pollution incident would only be accidental and if happened would probably disappear in time. Tidal flows are constantly changing work may alter them a little put should not have a big impact. Local ecology is important and should always be protected where at all possible to do so.</p>	<p>Careful consideration has been given to the Scheme proposals to seek to avoid, minimise or mitigate any likely adverse effects. For further information, please see the ES (application document A17).</p>

Consultee	Comment	ESC Response
	Construction is the most important parts of the project it needs to be done correctly so that it is able to operate properly.	Noted.
	The tidal barrier being closed during a flood event or tidal surge is essential and is why it mainly has been built. Regular maintenance and testing of the tidal barrier is also essential however; should be done to minimize disruption to other people and things as much as is possible to do so. People being notified of this in advance would also be good.	Maintenance of the tidal barrier will be planned and communicated in advance.
	The barrier may stop surge water entering Lake Loathing however, it may start pushing it somewhere else. Down South Lowestoft seafront and beach also Pakefield beach and North Denes. Tidal flow changes will be minimal and would not have a major impact. Fish can go somewhere else temporarily offshore or up another river. ABP do sediment removal and dredging regularly. Sites in use should be cleaned so as to not affect future users. Physio-chemicals should be kept to a minimum where possible.	The tidal barrier will have no impact along the coast. The volume of water the barrier will prevent from flowing into Lake Lothing is very small in comparison to the volume of the North Sea. Flood risk modelling has been carried out to determine there are no negative impacts of flood risk outside the scheme.
River User/ Individual Community Member/ Lowestoft resident	The overall works are very important - all thinking individual would agree. Keep those affected well <u>informed</u> before + during works and problems should be kept to a minimum. This is especially relevant to any last-minute changes.	Support for the Scheme noted.
Business Owner / Landowner/ Individual Community Member / Lowestoft	Major concerns about noise & vibration to nearby businesses & residents. Major concerns about increase in traffic through town by concrete delivery lorries	It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.

Consultee	Comment	ESC Response
resident		There will be piling during the course of the project, and this will cause noise and vibration. But it is anticipated that this will be limited to a period of approximately six months, spread out over the first 18 months of construction.
Anonymous	Flooding has been a real problem for many years and with global warming coming we will need it.	Support for the Scheme noted.
Anonymous	Supports the barrier - Great idea let's get on with it please.	Support for the Scheme noted.
	Sometimes you have to have a bit of disruption to achieve a long term goal.	
Individual community member/ Lowestoft resident	Construction may cause terrible traffic congestion.	<p>The construction methodology has been developed to avoid the use of roads where possible, moving material to the site on the water. There may be some longer bridge openings. These will be known and communicated in advance.</p> <p>There are currently no road closures planned. The location of the site compound will allow project staff to walk or cycle to the construction site, reducing potential increases in traffic.</p>
	Okay with possible noise and vibration, but it may effect local trade.	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But it is anticipated that this will be limited</p>

Consultee	Comment	ESC Response
		to a period of approximately six months, spread out over the first 18 months of construction.
	I think the benefits will outweigh the negatives in the long term.	Support for the Scheme noted.
Anonymous	It's important we protect our environment, especially the town and low lying residential areas.	Support for the Scheme noted.
	As an investor I would want to know my investment, at least the physical aspects of it are as secure as they can be.	
Individual community member/ Lowestoft resident	It's needed to save time, money, jobs and lives potentially.	Support for the Scheme noted.
	With rising sea levels, will it be enough for another 'once in a hundred years' event?	Extensive flood risk modelling has been carried out, considering the projected impact of climate change, to ensure the tidal barrier will provide better protection for the next 100 years.
	Colin Law Way is a long way from the construction site. Construction traffic would impact on traffic flow on Bascule Bridge, around the Station etc. Lots of land available off Whapload Rd area.	During the course of construction, there will be no need for additional traffic management such as land closures and diversions. There will be times when an increase in traffic is noticeable. This is likely to be when the project is ready for delivery of concrete. We will know in advance when this will be and will let people know. As much as we can, we will be using Lake Lothing to move material to site to reduce additional traffic.

Consultee	Comment	ESC Response
	If the Construction workers worked shifts, 6-2, & 2-10 and actually worked in those hours it would be done quicker and more efficiently, rather than the current works where, at any time, you could see 4 people watching and 1 working, and knocking off at 12on Friday. Not getting value for money.	The proposed working hours have been established having regard to the need to efficiently deliver the Scheme whilst also seeking to mitigate any environmental effects that the construction activities required might give rise to.
	Given the site position it could be 24/7 shifts.	The proposed working hours have been established having regard to the need to efficiently deliver the Scheme whilst also seeking to mitigate any environmental effects that the construction activities required might give rise to.
	Environmental impacts of construction - Irrelevant. What's more important, humans or wildlife/plants?	Support for the Scheme noted although ESC also fully recognises the importance of minimising the effects of the proposals on the environment.
Individual community member/ Lowestoft resident	We only flood twice in a hundred years you should keep replacing the greyness and sea defences like you did in the sixties get your act together which you won't	The case for the Scheme is set out within the Statement of Aims (application document A4) that accompanies the application.
	People don't shop in Lowestoft me included no free parking homeless in shop doorways go to BECCLES Southwold it's thriving no decent bus service	Aspects of the feedback relate to matters beyond the scope of the Scheme.
	Repair Jackson's jetty and all groynes to PAKEFEILD lighthouse.	Aspects of the feedback relate to matters beyond the scope of the Scheme.
	Construction/ environmental impacts - Won't affect me	No response required.

Consultee	Comment	ESC Response
Individual community member/ Lowestoft resident	Hope I can get cheaper home insurance soon.	Support for the Scheme noted.
Anonymous	Investment - It isn't just down to the local area flooding. It's also down to the footfall in the town, there isn't much to attract people into the town. The rents are too high surely landlords would rather be getting some cash flow in rather than it sitting there empty. The confidence would increase for more offshore work in the area due to the measures of the barrier being put in place.	Support for the Scheme noted although some aspects of the feedback relate to matters beyond the scope of the Scheme.
Anonymous	The residents have had so much disruption to their lives in the last few years	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But it is anticipated that this will be limited to a period of approximately six months, spread out over the first 18 months of construction.</p>
Lowestoft resident flooded in 2013	Businesses and property owners alike will benefit greatly from the reassurance the flood defences will give them.	Support for the Scheme noted
Individual	Red line boundary - No problem with it.	No response required.

Consultee	Comment	ESC Response
community member/ Lowestoft resident	As we're located close to the Bascule Bridge we will be affected but looking at the bigger picture are more than happy to put up with short term inconvenience and disruption.	Support for the Scheme noted
	Can't wait for the reassurance the project will bring that our home won't be flooded again.	
	Delighted that this investment in Lowestoft is being made.	
Anonymous	Previous floods have proved how vulnerable parts of Lowestoft are.	Support for the Scheme noted
Tenant of Riverside Business Centre	We have already experienced noise and vibration within the building. We are able to cope but hopefully it will be built quite swiftly.	It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be. There will be piling during the course of the project, and this will cause noise and vibration. But it is anticipated that this will be limited to a period of approximately six months, spread out over the first 18 months of construction.
	If we can access Canning Road then we are unaffected.	Noted.
Business Owner	If it tempers the flood risk it's very sensible.	Support for the Scheme noted
	It's Lowestoft. We're used to constant disruption and will be accepted like every other major one we've had during the recent crossing works both sides.	

Consultee	Comment	ESC Response
Anonymous	Supports the barrier, although I'm not sure how that is going to work really. What will stop a flood tide going round and over the side of the gates. Also the contractor should be forced to use locally based suppliers and workers.	<p>The tidal barrier will have no impact along the coast. The volume of water the barrier will prevent from flowing into Lake Lothing is very small in comparison to the volume of the North Sea.</p> <p>Flood risk modelling has been carried out to determine there are no negative impacts of flood risk outside the scheme.</p> <p>Where possible local suppliers and sub-contractors will be used</p>
Anonymous	Though I support this scheme, as a Lowestoft resident, I do see it as a Climate Emergency adaptation project rather than mitigation. I believe that we collectively have to be much more emphatic in demanding sensible routes towards mitigation goals.	Support for the Scheme is noted.
	Investment - There's a possibility omitted, i.e. It will maintain current levels of confidence	Support for the Scheme is noted
	It might have some impact at a personal level, but so does everything else...	Careful consideration has been given to the Scheme proposals to seek to avoid, minimise or mitigate any likely adverse effects. For further information, please see the ES (application document A17).
	People will complain. Good communications will be the best answer.	<p>As explained within the Mitigation Action Plan provided at Appendix 18A to the ES (application document A17), a community Liaison Manager will be appointed for the duration of the construction phase.</p> <p>A Stakeholder Communications Plan will also be developed and implemented that includes community engagement before</p>

Consultee	Comment	ESC Response
		work commences on the Scheme.
	It's a lot of concrete, but my feeling is that marram grass won't work in this situation.	No response required.
Oulton Resident	With the ever-increasing risk of coastal flooding due to sea level rises from climate change, the town and villages within the area need to be able to defend itself.	Support for the Scheme noted.
	Giving the area a coastal defence will help encourage investment and growth in the area.	
	Construction - This is unlikely to have an impact on me as I work from home.	
	The sooner construction is complete, the better for everyone.	
	Providing water quality can be maintained, then thus should generally mitigate anything else.	
Business Owner	The information presented doesn't really demonstrate how alternative options to the selected scheme have been considered. Controlling sea levels at this location will probably have impacts East bound, so outcomes with and without for the full affected areas should be shown. If proven that this solution and system achieved a cost benefit outcome, what measures are used and in place to activate a flood barrier closure? What sort of contract would this be let on? Who owns the responsibility if it fails under set conditions?	<p>Chapter 4 (Consideration of Alternatives) of the ES (application document A17). explains the main alternatives that were considered in developing the proposals. The tidal barrier will have no impact along the coast. The volume of water the barrier will prevent from flowing into Lake Lothing is very small in comparison to the volume of the North Sea.</p> <p>Flood risk modelling has been carried out to determine there are no negative impacts of flood risk outside the scheme.</p> <p>Once complete the barrier will be operated by ESC.</p>

Consultee	Comment	ESC Response
	How are other projects and planning permissions phased with this potential development?	The ESC team will liaise with other planned projects in Lowestoft, such as the redevelopment of the Royal Plain.
	These works could be carried out (safely) with minimal navigational impact, though at increased costs	The impact of closing the navigation channel has been carefully assessed. ESC will work with channel users to, where possible, mitigate the impact of channel closures.
	The channel should and could be only closed for very short periods if the construction process is phased. And if the location is deemed most appropriate.	Closures will be planned and communicated in advance.
	Proper environmental benefits and considerations will be discarded due to the costs of executing.	Careful consideration has been given to the Scheme proposals to seek to avoid, minimise or mitigate any likely adverse effects. For further information, please see the ES (application document A17).
	How much local content will be considered? Or will this scheme be similar to the third crossing, where major components and parts are imported and barged in from European neighbours...	It is intended that, where possible, local suppliers and sub-contractors will be used.
	There is probably a better method to control the seabed around the location than continually opening and closing the gates, adding wear and tear	Noted.
	Who will own and operate the tidal barrier? A contractor who travels hundreds of miles to activate the maintenance? Or local contractors?	The tidal barrier will be an ESC asset and will be operated by a local team.

Consultee	Comment	ESC Response
	<p>What happens in the event of complete failure? The barrier doesn't close, or closes and can't open?</p>	<p>A full barrier operations plan is in place to support the closure and opening of the gates in the event of a tidal surge. This includes procedures should failure of components occur such as:</p> <p>24 hours before the tidal barrier will be closed, deployment pre-checks will be carried out to give the team time to resolve any issues that become apparent. The pre-checks will involve the whole or full movement of the mitre gate. Additional pre-checks will take place 2 hours before planned closures to make sure power supply is still available and water level sensors are still operating properly.</p> <p>There are a number of features and items of the gate, as well as mechanical and electrical plant and equipment, that will be incorporated into the barrier operating system to provide backup/ levels of operational redundancy should certain components that are critical to the deployment of the gate fail.</p> <p>It is envisaged that a stand-by generator will automatically start up should mains power be lost.</p> <p>Two electronically operated winches will be provided one on the north-eastern end of the barrier structure, and one on the south-eastern side. Electric winch operation will provide the ability to open or close individual leaves of the mitre gate if there is a loss of hydraulic power.</p>

Consultee	Comment	ESC Response
		<p>If the tidal barrier fails to reopen after being closed, it has been designed to naturally open with the falling tide to prevent total blockage of the navigation channel.</p>
Shopmobility	<p>My charity is Lowestoft Shopmobility at 15, Station Square, which is right opposite the inner harbour or Trawl Basin I think you call it. We had to use sandbags to stop any flooding in 2013.</p>	<p>The case for the Scheme is set out within the Statement of Aims (application document A4) that accompanies the application.</p>
	<p>Noise & Vibration - Being at 15, Station Square we would be concerned about this. We already have in our "shop" a box which is measuring the vibrations of all the past work but have never had any feedback from the results of this. Presumably we will have the same again?</p>	<p>It is not possible to complete a project of this nature and magnitude without times when noise levels are significant. However, we will let people know well in advance when those periods of noise will be.</p> <p>There will be piling during the course of the project, and this will cause noise and vibration. But it is anticipated that this will be limited to a period of approximately six months, spread out over the first 18 months of construction.</p> <p>During these periods monitors will be placed in nearby buildings to ensure vibration remains inside specified safe levels.</p>
	<p>The only closure which would impact on us and our clients is closure of the Bascule Bridge.</p>	<p>There may be some prolonged openings of the Bascule Bridge for large movements of material to site from the site compound on Colin Law Way. These will be known and communicated in advance.</p>
	<p>I cannot see that year-round working would impact on us too much.</p>	<p>Support for the construction methodology noted.</p>

Consultee	Comment	ESC Response
	I am sure the local ecology would soon recover. We have hundreds of Kittiwakes which are nesting all over the town!	
Anonymous	The water will find its way in further up the coast.	The tidal barrier will have no impact along the coast. The volume of water the barrier will prevent from flowing into Lake Lothing is very small in comparison to the volume of the North Sea. Flood risk modelling has been carried out to determine there are no negative impacts of flood risk outside the scheme.
Anonymous	To protect the environment, wildlife and human homes.	Support for the Scheme noted
	Investment will be increased - By saying that we take flooding seriously.	
	Construction won't affect me, as I live about 2 miles from site.	No response required.
Individual community member/ Lowestoft resident	It is unclear as to how "at risk" the area is and what this barrier will achieve.	Almost 10 years ago, in December 2013 over 150 homes and businesses were flooded, and Lowestoft was affected for many days after the tidal surge. As the only undefended town in the UK, this triggered the need for action and the introduction of Lowestoft Flood Protection scheme. In Autumn 2023 the construction of the tidal walls will be complete, protecting many homes and businesses. The remaining element of the project, the tidal barrier, will begin construction in 2025.

Consultee	Comment	ESC Response
	I'm pretty sure cleaning up the town centre might attract more investors and businesses!	Support for the Scheme noted.
	Red line boundary - None, looks well thought out.	
	Construction impacts - None, it's not a residential area	
	What negative impact would this have on the shipping and marine industry bridge side? And pleasure craft?	<p>The impact of closing the navigation channel has been assessed. The scheme will work with channel users where feasible to mitigate the impact of channel closures.</p> <p>Closures will be planned and communicated in advance.</p>
	Seems a long construction period for commissioning some gates. Surely preparation works could reduce the total closure?	ESC is seeking to minimise cost and programme as much as possible.
	Will there be local content sourcing for the scheme?	Where possible local suppliers and sub-contractors will be used.
	Who pays and owns it?	<p>Funding for the tidal barrier has come from a variety of sources including ESC, the Government's Green Recovery Fund and the New Anglia Local Enterprise Partnership.</p> <p>Once complete the tidal barrier will be an ESC asset.</p>
Individual community member/ Lowestoft resident/ Port Organisation	What are the associated secondary radial gates? Were these mentioned in the construction sequence in Case for Change? Have I missed something?	The secondary radial gates are connected to and retract into the bottom of each mitre gate leaf. When the gate is in the closed position they are lowered through approximately a metre depth of silt to close on the concrete cill and

Consultee	Comment	ESC Response
		<p>seal the gate opening. They can be raised to allow sluicing to occur so as to equalise water levels either side of the barrier.</p> <p>They were not mentioned separately in the construction sequence as they form an integral part of the whole barrier gate.</p>
Waveney Chamber of Commerce	It's other reasons in vectors haven't come to Lowestoft.	Noted.
	Essential infrastructure to protect Lowestoft from marine flood and major damage such an event would cause.	Support for the Scheme is noted
	It will provide investor assurance that the town will have sufficient protection to mitigate the risk of a repeat of the extensive damage to buildings and infrastructure caused by the last event.	
	The impact mitigation measures are reasonable for the scope of work involved.	Support for the Scheme noted
Well considered proposals.		
Individual community member/ Lowestoft resident	Unsure of support - Cost implications, construction implications, boating implications.	The case for the Scheme is set out within the Statement of Aims (application document A4) that accompanies the application.
	Not sure investors and/or businesses are that fussed by water ingress apart from those on Waveney Drive and other roads surrounding the docks.	
	Impossible to locate on https://www.lowestoffrmp.org.uk/project-background . Lists A-L appendices	
	Visiting boats arrive outside of July/August. Limited attitude and knowledge exposed.	It is known that visiting boats and other vessels regularly navigate

Consultee	Comment	ESC Response	
	See answer above - not possible to find 'impacts....and mitigation. (just the one mitigation?)	<p>through the Inner Harbour Entrance Channel outside of July/August. However, from assessing the impact of closing the navigation channel, it has been determined that the peak period when a channel closure would cause the most disruption is between mid-July to the end of August – particularly for recreational navigation users.</p> <p>The Scheme will work with channel users, where possible, to mitigate the impact of channel closures.</p> <p>Closures will be planned and communicated in advance.</p> <p>Please see chapter 15 (Navigation) of the ES (application document A17) for further details.</p>	
	Make sure prior notice is widespread.		
	The consultation booklet is not user-friendly.		

The table below shows the responses received from Port tenants during the 2023 consultation. The feedback received has fed into the navigation impact assessment undertaken.

Table 20: Responses to June 2023 Consultation

Stakeholder	Date	Purpose / what are you looking to achieve?	What was achieved?
Greater Gabbard Offshore Wind Farm	03/07/2023	Letter in response to the tidal barrier consultation.	<p>Raised concerns relating to:</p> <ul style="list-style-type: none"> • Berthing allocation • Fuel supply access • Parking Provisions • Port accessibility • Noise and vibrations <p>Project team to organise a meeting to discuss and take these into account.</p>
Petersons	04/07/2023	Meeting with project team to provide update on the tidal barrier project and discuss current planned channel closure durations and the impacts this may have.	<p>Petersons encouraged to have early engagement on this matter. Project team to visit site to understand how Petersons operate.</p> <p>Petersons advised loading boats can be done in the outer harbour during times of closure, but fuelling is more complex. Tankers an option but costly, advised there may be fuelling on the redeveloped LEEF.</p> <p>Petersons to share typical summer activity from previous three years to enable project team to understand peak times.</p> <p>Project team advised weekly meetings would be offered during construction with a two week lookahead to keep informed of construction activity, even when not impacted.</p>
Caudwell Marine	04/07/2023	Meeting with project team to provide update on the tidal barrier project and discuss current planned channel closure durations and	<p>Caudwell Marine advised Peel Ports in Great Yarmouth charge £150 per vessel each way if they need to access the North Sea that way during the planned closures.</p> <p>Advised fuelling would be the biggest issue – uses EM560, which the RNSYC do not currently stock.</p>

Stakeholder	Date	Purpose / what are you looking to achieve?	What was achieved?
		the impacts this may have.	Project team advised weekly meetings would be offered during construction with a two week lookahead to keep informed of construction activity, even when not impacted.
CEFAS	04/07/2023	Meeting with project team to provide update on the tidal barrier project and discuss current planned channel closure durations and the impacts this may have.	<p>CEFAS advised their Endeavor vessel requires a deepwater berth, concerned increased sediment might increase dredging requirements. Project team advised that outside of the cofferdams there would be no other sediment change. This will be monitored throughout construction.</p> <p>CEFAS advised Endeavor periodically comes in and out of Port, will share schedule with project team. Important to have dialogue with the team to indicate times when closures would have minimal impact.</p> <p>CEFAS advised ABP lease expires in 2025.</p> <p>Project team advised weekly meetings would be offered during construction with a two week lookahead to keep informed of construction activity, even when not impacted.</p>

SCHEDULE 7

FEEDBACK RECEIVED FROM CONSULTEES ON DRAFT ORDER (MAY 2023)

The table below identifies the parties who provided comments on the draft Order, the nature of the comments they provided and explains how the comments made have been taken into account.

Table 21: Comments in response to consultation on Draft Order (May 2023)

Provision of Draft TWAO	Comment Received	How comment has been taken into account
Consultee: Associated British Ports		
Article 2 (<i>Interpretation</i>)	<p>“building” – this should be updated to include port infrastructure (to ensure that this is covered by the related protective works covenants).</p>	<p>It is considered that port structures / buildings would already be caught by the existing definition of “building” and so no amendment has been proposed to the draft Order (application document A2).</p>
	<p>“Inner Harbour Entrance Channel”, “Inner South Pier” “Inner North Pier” “Lowestoft Harbour” – for the avoidance of any doubt, all of these definitions should be clearly set out by reference to an approved plan.</p>	<p>These areas are clearly labelled within the TWAO application, including within the Planning Direction Drawings (application document A16) and so no amendment has been proposed to the draft Order.</p>
	<p>“marine environment” – include a reference to 2 metres from the quay edge. The rationale for this definition requires explanation.</p>	<p>This definition has been included to enable a distinction to be drawn between the marine and the terrestrial environments and so no amendment has been proposed to the draft Order.</p>
	<p>“navigation” – whilst the inclusion of recreational navigation is agreed, the definition should be expanded to ensure all navigation is addressed.</p>	<p>The ordinary definition of ‘navigation’ is already clear. The purpose of the definition is to clarify that recreational navigation is included, unless stated otherwise and so no amendment has been proposed to the draft Order.</p>

Provision of Draft TWAO	Comment Received	How comment has been taken into account
Article 4 (<i>Power to construct and maintain works</i>)	4(3)(a) - the works included here must be tied to a plan to provide some certainty. The works 'as the Council thinks fit' should be removed.	<p>The scheduled works will be shown on the works plans submitted with the TWAO application (drafts of which are enclosed with this letter), ancillary works are not shown on a plan due to their minor nature. The principal purpose of these well-established provisions relating to ancillary works is to enable further details to emerge at detailed design stage.</p> <p>Therefore, it is not appropriate or necessary to show them on the Order plans. We do not consider that the wording works 'as the Council thinks fit' should be removed', the purpose of this wording is to denote that these ancillary works will only be undertaken where ESC has deemed them necessary as part of the Scheme. There is precedent for this wording in the Boston Barrier Order 2017 and the Bridgwater Tidal Barrier Order 2022 and so no amendment has been proposed to the draft Order.</p>
	4(3)(b) - embankments should be defined or removed (ABP are not aware of any being proposed as part of the Works).	References to 'embankments' are not considered to be necessary and so this wording has been removed from article 4(3)(b) of the draft Order.
	4(3)(f) – please clarify to what this is intended to relate?	The scope of the ancillary powers has been drawn having regard to the nature of the construction activities required for the Scheme and in view of recent precedents in other made

Provision of Draft TWAO	Comment Received	How comment has been taken into account
		Orders. Given the requirement for works in and to watercourses this provision has been included at Article 4(3)(f).
Article 5 (<i>Power to deviate</i>)	Generally, it is understood that the extent of the limit of deviation was intended to reduce as the plans were further developed. In light of the proposed timescales, we assume the plans are now fully developed/finalised – as such, please can you advise the final proposed limits of deviation? Again, it is difficult to comment without the final plans.	The limits of deviation are shown on the Order Plans (application document A3), drafts of which have also now been shared with ABP.
	5(3)(b) – the reference here to surface bed is incorrect. We assume this should be mean high water. In this respect, you should also clarify if this is at spring tide or neap tide.	Article 5(3)(b) has been updated such that the measurements are now stated with reference to Above Ordnance Datum (AOD).
Article 7 (<i>Works and dredging etc. in the marine environment</i>)	ABP would propose that, when dredging is required, the Council should apply to the harbour authority, requesting it to undertake the dredging works (at the Council's cost) and in accordance with an agreed programme. In the event that ABP is unable to dredge (for instance, if it does not have access to the specific dredging technology required for the area surrounding the Gates) then the Council will have the right to step in and dredge (subject to all Port health and safety requirements/access protocols etc.).	Whilst ESC is content to explore the possibility of ABP undertaking dredging on its behalf, ESC must retain the powers in the Order to undertake the dredging to ensure the Scheme can be delivered and so no amendment has been proposed to the draft Order.
Article 12 (<i>Temporary stopping up and diversion of streets</i>)	No stopping up/diversion should occur to ABP roads without ABP's consent. In addition, please can you clarify how any proposed road closures would impact ABP's pilot transports?	ABP would be consulted in relation to the exercising of the powers under Article 12(1) in respect of roads for which ABP is the 'street authority'. ABP have been asked to provide further detail as to its pilot transports.

Provision of Draft TWAO	Comment Received	How comment has been taken into account
Article 17 <i>(Temporary closing of Inner Harbour Entrance Channel in connection with works)</i>	We have requested details of any dialogue with tenants above. Until we have had the opportunity to liaise with tenants, we reserve our position in respect of this article.	Details of consultation undertaken with Port tenants and users is provided in this report.
Article 19 <i>(Power to take, pump, impound and discharge water)</i>	As a statutory harbour authority, ABP has a strict protocol in place for these actions. As such, an ABP consenting regime must be incorporated into this article. Clarification as to what precisely is proposed would be welcome. The Explanatory Memorandum probably requires expansion?	ESC has requested a copy of the protocol to which ABP has referred. A copy is awaited and, in the meantime, no amendment has been proposed to the draft Order.
Article 20 <i>(Water abstraction and impounding)</i>	Please clarify when abstraction may be required. ABP may wish to test the scope of this article.	The proposed construction methodology for the Scheme is set down within Chapter 6 (Scheme Description) of the ES (application document A17).
Article 23 <i>(Power to survey and investigate land)</i>	From the outset, we should be clear that no unauthorised personnel are permitted to be on Port land. Any visitors must be met and accompanied on site (and must comply with the access protocol and health and safety protocol). As such, any investigations/surveys would need to be accompanied (and ABP would charge the time incurred in doing so). Each visit for the purpose of surveying or investigating would need to be approved by ABP.	ESC is happy to discuss the practicalities of Port access for surveys and investigations and has historically complied with the Port's requirements in respect of recent works undertaken.
Article 25 <i>(Tidal works not to be executed without approval of the Secretary of State)</i>	As a general point, it is unclear why both "tidal works" and works in the "marine environment" are required. Please can you clarify the distinction between the proposed works? It appears to us that there may be a risk of duplication.	Whilst tidal works would also be works within the marine environment, the latter term has been employed more generally throughout the Order to reflect activities within the marine environment. As such the latter is broader in scope. It should be noted that in other recent TWAOs relating to tidal barriers the term 'river area'

Provision of Draft TWAO	Comment Received	How comment has been taken into account
		has been employed to similar effect. The marine environment in Lowestoft harbour is not generally referred to as a river and for this reason alternative terminology has been employed.
	25 (i) – There should also be a requirement for these works to be approved by ABP (as well as the Secretary of State). This reflects the protective provision.	Appropriate provisions for the protection of ABP in its capacity as the statutory harbour authority have been included within Schedule 9 to the draft Order and so no amendment has been proposed to article 25.
	25(3) – There should be a requirement to consult with ABP in this respect.	In circumstances where notice has been served by the Secretary of State ESC would be obliged to comply with that notice. It is not clear where the opportunity for consultation with ABP would arise in that scenario and so no amendment has been proposed to the draft Order.
<i>Article 26 (Lights on tidal works during construction)</i>	26 - Again, there should be a requirement for approval from ABP (as SHA).	Article 26 of the draft Order has been amended to provide that ESC will take steps for the prevention of danger to navigation as directed by ABP. Note that Articles 27 and 30 of the draft Order have also similarly been amended.
	We have provided an overview position above but, generally, are unable to comment until Schedules 4 and 5 are populated.	Not applicable.
	As above, ABP has significant concerns with respect to the current operating proposals for the	Safety is of the upmost importance to ESC and the

Provision of Draft TWAO	Comment Received	How comment has been taken into account
Article 43 (<i>Power to operate scheduled works</i>)	<p>Gates. By way of example only, we note that when operating the Flood Gates the Council must 'have regard to the safety of vessels in the environment'.</p> <p>It is unclear, however, how the Council would have regard to this as they have little to no visibility over this (nor are we aware of any proposals in this respect which would allow them to properly comply with this requirement).</p>	<p>assessment of the operational phase of the Scheme on navigation has not identified risks to the safety of vessels.</p> <p>ESC would welcome further discussion with ABP as to the proposed operational arrangements for the Scheme.</p>
	<p>43(6) – ABP cannot accept this. Again, by way of example, if the Gates malfunction and an ABP customer is caught within the channel, the customer would incur significant cost which – inevitably – it would want to seek to recoup from ABP.</p> <p>This would not necessarily arise as a result of negligence but could have costly consequences if a vessel is operating to a strict timetable (as is often the case).</p>	<p>The drafting of Article 43(6) reflects the provisions of earlier made Orders relating to tidal barriers, including those within operational ports and so no amendment has been proposed to the draft Order.</p>
Articles 44-50	<p>44 to 50 – The powers provided to the Council under these articles to an extent duplicate the harbour authorities existing powers. The Council should not be seeking to effectively adopt the role of the harbour authority. As such, these powers are inappropriate and unnecessary. If necessary, ABP would be content to accept a 'last resort' step-in power in the unlikely scenario that the harbour authority has not taken action against such offences.</p>	<p>ESC, as the promoter of the TWAO application, is seeking the rights and powers considered necessary to enable the construction, operation and maintenance of the Scheme and so no amendment has been proposed to the draft Order.</p> <p>There is no intention on the part of ESC to take on the general statutory duties of ABP as the harbour authority. It is ESC's desire to work with ABP as harbour authority to ensure the Scheme can be delivered without unduly impeding on its statutory responsibilities.</p>
Article 51 (<i>Byelaws</i>)	<p>51 – Please see our comments on the relevant schedule below.</p>	<p>Noted.</p>

Provision of Draft TWAO	Comment Received	How comment has been taken into account
Article 58 (<i>Power of disposal, agreements for operation, etc.</i>)	58 – There is a typo of 'may'	Article 58(1) has been amended to address this.
Articles 64 (<i>Disapplication of legislation</i>) and 65 (<i>Local legislation</i>)	64 to 65 – These disapplication provisions are currently not accepted and we look to justification from the promoter.	The purpose of the proposed disapplication of certain existing legislation is explained in the Explanatory Memorandum to the draft Order (application document A3).
Schedule 1 – Scheduled Works	Work No 1 (c) – insert an agreed depth	Article 5 of the draft Order provides the depth.
	Work No 1 (d) – this needs to be more specific, how many piles/where etc. In addition, the reference to quaysides needs to be clarified, we understand that this should be the Inner Northern Pier and Inner Southern Pier but please advise if there are any other areas captured.	Work No 1(d) has been amended to specify the existing quaysides referred to (the North Quay and the South Quay).
	Work No 3A – this needs to include details of the building's height etc.	Whilst the TWAO will be bound by the limits of deviation shown on the Order plans, the detailed design of the operational buildings required to deliver the Scheme has yet to be undertaken. Further details can be found within the Planning Direction Drawings (application document A17) and the Design and Access Statement for the Scheme (application document A13).
	Work No. 4 – there needs to be an obligation to hand back at the Council's cost here.	Whilst ESC has confirmed to ABP that Work No.4 will be handed back to ABP, no amendment to the Order

Provision of Draft TWAO	Comment Received	How comment has been taken into account
		provisions are considered to be necessary in this respect.
	Work No. 6 – it should be made clear that these buildings are to be temporary. What is the council's intentions with regard to each building?	The buildings referenced in Work No. 6 are not proposed to be temporary – they relate to permanent welfare and storage facilities required in connection with the operation of the barrier.
Schedule 3 – Modification of compensation and compulsory purchase enactments for creation of new rights	We do not have sufficient information to comment on this Schedule at this time. We reserve our client's position to do so in due course.	Noted.
Schedules 4 and 5 – Compulsory Acquisition and Temporary Possession	As above, these schedules are blank. This information is vital to ABP reverting with a full position on the Draft Order and, as such, we request that this is provided by return.	Schedule 4 (<i>Land which may be compulsorily acquired</i>) and Schedule 5 (<i>Land of which temporary possession only may be taken</i>) have now been populated in the draft Order. Draft Land Plans were shared with ABP.
Schedule 6 – Lowestoft Tidal Barrier Byelaws	This schedule (and the related article) is unnecessary.	<p>The proposed byelaws are considered to be necessary. They will enable ESC to take appropriate action in the event of activities or behaviours in the vicinity of the proposed infrastructure that might otherwise lead to damage or a safety risk.</p> <p>The inclusion of byelaws is preceded in other recent statutory works Orders.</p>

Provision of Draft TWAO	Comment Received	How comment has been taken into account
Schedule 9 – Protection for the Harbour Authority	3(1) – The plans provided should be full and detailed. The words ‘(except for minor works or maintenance or repair)’ should be removed. The square brackets around ‘approval’ should be removed.	<p>The definition of ‘plans’ is such that ESC will be required to provide “plans, sections, elevations, drawings, specifications, programmes, construction methods and descriptions” in respect of the works.</p> <p>However, ESC must retain the ability to undertake minor maintenance and repair works without needing to seek ABP’s approval. The square brackets around ‘approval’ have been removed.</p>
	3(3) – This needs some amendment. Plans should be provided to ABP, who should have 28 days (or, if necessary, such longer period as agreed between the parties) to approve or refuse the plans (acting reasonably and providing full reasons in the event of a refusal). ABP require the ability to approve and comment on the plans. There may also be some scenarios where 28 days is too short – if, for instance, external consultants are required – and, as such, we have suggested that provision is included to agree a longer period. ABP does not accept a deemed approval provision, this should be removed.	<p>ESC is willing to agree an appropriate extended time period in specified circumstances and will consider the appropriate mechanism for this.</p> <p>In circumstances where a response from ABP to the relevant plans provided has not been forthcoming, ESC must retain the ability to undertake the works to ensure delivery of the Scheme.</p>
	3(4) – As below, any requirement for an inspection must be accompanied (at Council cost). It must be undertaken in accordance with ABP health and safety protocols and access procedures.	Paragraph 3(4) provides a right for ABP to inspect, rather than a requirement upon it to do so.
	4 – As built drawings must be provided to ABP within 3 months of completion.	Paragraph 4 of Schedule 9 has been amended to provide for this.
	5(1) – The ability to close Lowestoft Harbour must be a general power exercisable only ABP acting	Article 5(1) does not limit ABP’s power to close the harbour to

Provision of Draft TWAO	Comment Received	How comment has been taken into account
	<p>in its role as harbour authority. It cannot be limited to a scenario where it is requested to do so by an emergency service or government agency. This is necessary to ensure it can properly meet its responsibilities as harbour authority.</p>	<p>only where it is requested to do so by an emergency service or government agency.</p> <p>ABP may also close the harbour where ABP “reasonably considers that it is necessary to do so in response to [...] any emergency or accident, or an imminent threat to the health or safety of persons”.</p>
	<p>5(2) – We would suggest this is via Notice to Mariners.</p>	<p>Please see chapter 15 (Navigation) of the ES (application document A17) for further details.</p>
	<p>5(6) – This is not sufficient. ABP must be consulted in advance of any sale, agreement or other transaction under article 6 as it needs to be satisfied that the entity is of suitable standing. This consultation should be undertaken as soon as reasonably practicable.</p>	<p>It is assumed that this comment is directed at paragraph 6 of the protective provisions.</p> <p>Any such transfer would require the consent of the Secretary of State under Article 6 of the draft Order and this would therefore be a matter for the Secretary of State’s consideration.</p>
	<p>8 – At this stage we would simply note that provision will need to be made for loss of business arising as a result of the construction and operation of the Gates.</p>	<p>ESC recognises the need for further discussion with ABP regarding the payment of compensation in accordance with the compensation code.</p>
	<p>In addition to the above, there are a number of further protections which ABP require. Until we have had full details of the plans/schedules etc., we must reserve our position to add to these additional requirements, which are set out below:-</p> <ul style="list-style-type: none"> • In the event that the Council undertake its own dredging pursuant to step-in rights, if that dredging has an impact on the channel, ABP reserves the right to hold 	<p>The points raised in respect of dredging and compliance with ABP’s health and safety procedures and access protocol have been addressed above.</p> <p>In respect of the overriding traffic principle, ESC is content to agree to an appropriate form of words</p>

Provision of Draft TWAO	Comment Received	How comment has been taken into account
	<p>the Council liable for any and all costs incurred remediating this.</p> <ul style="list-style-type: none"> If the Council (or its agents) wish to enter the Port to carry out inspections/surveys, they will need to be accompanied by a member of ABP (the cost of which will be borne by the Council). Any persons will also need to strictly comply with ABP's health and safety procedures and access protocol. <p>The overriding traffic principle – as agreed in the flood wall agreements – will apply equally to the Works and must be included as a protective provision</p>	<p>and discussions continue between the parties.</p>
Consultee: Environment Agency		
<i>Article 22 (planning permission)</i>	<p>The TWAO/ EM makes reference to the TCP GPDO 1995 (Article 22) which is out of date – should be GPDO 2015.</p>	<p>The reference to the Town and Country Planning (General Permitted Development) Order 1995 in the relevant part of the Explanatory Memorandum (application document A2) has been updated.</p> <p>Article 22 of the draft Order references s90(2A) and s264(3) of the Town and Country Planning Act 1990, both of which are still in force.</p>
<i>Article 24 (Felling or lopping of trees)</i>	<p>Under Article 24 of the TWAO there is no mention of Tree Preservation Orders?</p>	<p>Although the provisions of this article would confer powers to fell trees on ESC, these powers would remain subject to the protection regime set out in section 211 of the Town and Country Planning Act 1990 and the relevant exemptions set down within the Town and Country Planning (Tree</p>

Provision of Draft TWAO	Comment Received	How comment has been taken into account
		Preservation)(England) Regulations 2012.
Consultee: Royal Mail		
Not applicable.	Is your client aware of the presence of Royal Mail post-boxes within the order limits? If so, this avoids our post-boxes team wasting time doing a search as it is generally very easy for a scheme promoter to identify where we have apparatus as opposed to that of other statutory undertakers.	It is understood that there are no Royal Mail post-boxes within the Order limits.
Consultee: Trinity House		
Article 54 (<i>Saving for Trinity House</i>)	We confirm that Trinity House welcomes and supports the inclusion of the saving provision in the draft Order.	Noted.
Article 27 (<i>Provisions against danger to navigation</i>)	We confirm that Trinity House welcomes and supports the provision generally made in Article 27 of the draft Order for the notification requirements to Trinity House, and its powers of direction, for the prevention of danger to navigation and the stipulation of appropriate Aids to Navigation in the case of injury to, or destruction or decay of, a tidal work or any part of it.	Noted.
Article 30 (<i>Permanent lights on tidal works</i>)	We confirm that Trinity House welcomes and supports the provision generally made in Article 30 of the draft Order for the prevention of danger to navigation, and its powers of direction, in relation to the stipulation of appropriate Aids to Navigation upon completion of a tidal work.	Noted.
Articles 27(<i>Provisions against dangers to navigation</i>) and 30 (<i>Permanent lights on tidal works</i>)	With regard to Articles 27 and 30, Trinity House would suggest that it may be advantageous, however, for provision to made within this part of the draft Order for the notification requirement on East Suffolk Council, and the powers of direction [of Trinity House] in relation to Aids to Navigations to additionally include reference to the Harbour	Articles 27 and 30 of the draft Order have been amended to provide that ESC will take steps for the prevention of danger to navigation as directed by Trinity House and the Harbour Authority or, failing agreement between them, Trinity House.

Provision of Draft TWAO	Comment Received	How comment has been taken into account
	<p>Authority (as defined in the draft Order) in each instance.</p> <p>This being the case, with regard to powers of direction in respect of Aids to Navigation it would also be appropriate, in our view, for the Articles to also make clear that in the event of any disagreement between Trinity House and the Harbour Authority in this regard the Aid to Navigation requirements would be as stipulated by Trinity House.</p> <p>We would suggest that this drafting would better reflect the powers and duties of Trinity House, as a GLA, having regard to section 199 of the Merchant Shipping Act, 1995, and section 78 of the Harbours Docks and Piers Clauses Act 1847 and, ultimately, provide further clarity on the position with regard to your client's position under the Order.</p> <p>We believe that there is precedent for such drafting as reflected by The Boston Barrier Order 2017 / SI 1329 https://www.legislation.gov.uk/ukSI/2017/1329/contents/made</p> <p>With regard to the above referenced potential amendments to the proposed Lowestoft Tidal Barrier Order, we would also respectfully draw attention to the fact that, within the proposed Order limits, there are existing local Aids to Navigation established. These Aids to Navigation having originally been subject to the sanction of Trinity House under its powers as a GLA.</p> <p>We anticipate that these existing Aids to Navigation are likely to be affected by the planned demolition and construction works for the new tidal barrier, if approved.</p> <p>Ordinarily, we would therefore expect the Harbour Authority to seek the sanction of Trinity House, as a GLA, for the modification, discontinuance or establishment of such local Aids to Navigation. Hence, therefore, it would</p>	

Provision of Draft TWAO	Comment Received	How comment has been taken into account
	<p>seem logical for appropriate provision to be made for the Harbour Authority within the drafting and context of Articles 27 & 30 of the draft Order.</p>	
<p>Article 26 (<i>Lights on tidal works during construction</i>)</p>	<p>Trinity House further observes that Article 26 (<i>Lights on tidal works during construction</i>) of the above referenced Boston Barrier Order refers to the Secretary of State and to the Harbour Authority as regards the prevention of such steps as are necessary for prevention of danger to navigation.</p> <p>We would suggest, therefore, that a similar drafting in Article 26 of the proposed Lowestoft Tidal Barrier Order might, therefore, be appropriate. Currently this Article appears to make no such provision for the Harbour Authority in this regard.</p>	<p>Article 26 of the draft Order has been amended to provide that ESC will take steps for the prevention of danger to navigation as directed Trinity House and the Harbour Authority or, failing agreement between them, Trinity House.</p>



To find out more about the Lowestoft Tidal Barrier, email or visit our website.



lowestoftfrmp@eastsoffolk.gov.uk

www.eastsuffolk.gov.uk

To view the Lowestoft Tidal Barrier TWAO Application Documents visit:

 **<https://www.eastsuffolk.gov.uk/lowestoft-tidal-barrier-TWAO-application>**

**Lowestoft Tidal Barrier
Order**

The Lowestoft Tidal Barrier Order

Transport and Works Act 1992

*Transport and Works (Applications and Objections
Procedure) (England and Wales) Rules 2006*

A17: Environmental Statement

Non-Technical Summary



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1. Introduction

The Lowestoft Tidal Barrier Scheme is being promoted by East Suffolk Council, with the aim of reducing the risk of flooding to the town of Lowestoft. The Scheme is one element of a wider strategy known as the Lowestoft Flood Protection (LFP) project.

Permission (consent) to construct and operate the Scheme is required before any building work or land access can commence. This permission is being sought in two ways:

- A Transport and Works Act Order (TWAO). As the tidal barrier will be built within the navigable channel and therefore interfere with rights of navigation in Lowestoft Harbour, an order is being sought under the Transport and Works Act 1992 to provide statutory authority for this interference. TWAO applications are made to, and determined by, the relevant Secretary of State who for this Scheme is the Secretary of State for the Environment, Food and Rural Affairs.
- A Marine Licence. This is required under the Marine and Coastal Access Act 2009 because works will require to take place below the Mean High Water Springs (MHWS) tide level. Licence applications are made to and determined by the Marine Management Organisation.

Listed Building consent will also be required for elements of work being undertaken in proximity to the Grade II* listed Royal Norfolk and Suffolk Yacht Club building (RN&SYC).

To support the TWAO and Marine Licence applications, an Environmental Impact Assessment (EIA) is required. This is reported in a document called an Environmental Statement (ES).

The aim of EIA is to protect the environment by ensuring that any significant environmental effects which the Scheme is likely to cause are identified and considered by decision makers during the consenting process.

The ES describes in detail the need for the Scheme, the legislative background, the alternatives considered, the consultation undertaken, the technical details of the Scheme and the anticipated environmental impacts in the following areas:

Table 1-1: Technical chapters that comprise the Environmental Statement.

Environmental Impact Area	Description
Chapter 8: Population and Human Health	Impact on the local population and their health and wellbeing.
Chapter 9: Noise and Vibration	Impact to humans, and buildings and infrastructure.
Chapter 10: Biodiversity, Flora and Fauna	Impact on the flora and fauna.
Chapter 11: Landscape and Visual Amenity	Impact on the characteristics of the landscape and on views of the Scheme from various locations.
Chapter 12: Water, Hydromorphology and Ground Conditions	Impact on water and silt and on ground conditions on the land.
Chapter 13: Historic Environment	Impact on historic buildings, landscapes and archaeological remains.

Environmental Impact Area	Description
Chapter 14: Transport	Impacts of construction traffic on the road network and areas of traffic congestion.
Chapter 15: Navigation	Impact on navigational users (both commercial and recreational).
Chapter 16: Air Quality and Climate	Impact of dust generation and on climate (generation of greenhouse gases).
Chapter 17: Cumulative Effects	Whether the Scheme could combine with other known projects to cause a greater environmental impact together than when considered separately.

The EIA has considered carefully which areas to include in the assessment and which areas do not need to be considered (“scoped out”) as they are not likely to be affected by the Scheme to a significant degree. The EIA considers the environmental impact of the works that will be required to build the Scheme and when the Scheme is completed and in operation. The EIA also considers how the proposed tidal barrier would operate, both today and in the future.

The EIA recognises that, whether or not the barrier is constructed, the surrounding environment is likely to change in the future due to climate change and other pressures. Many environmental areas will be sensitive to this future change, and the impact of the Scheme needs to be considered in this context of environmental change.

The focus of the EIA is on the likely significant effects of the Scheme. Whether the impact is significant is determined by considering the sensitivity of the environmental feature and the scale of the impact. The effect can be temporary (for example, noise during construction) or permanent (for example, the visual impact of the barrier once constructed).

The environmental effect can be positive or negative depending on the receptor and the impact. Where negative effects may result from the Scheme, mitigation measures have been identified where possible to avoid or mitigate those effects, for example, by changes to the design of the Scheme.

This non-technical summary (NTS) summarises the findings of the EIA which is documented in the ES.

The ES is available from the following website: <https://www.eastsuffolk.gov.uk/lowestoft-tidal-barrier-TWAO-application>.

Electronic copies are available to view at the following locations:

Table 1-2: Locations of ES electronic copies.

Location	Opening times
East Suffolk Council Riverside, 4 Canning Road, Lowestoft, NR33 0EQ	Mondays to Fridays: 0800 to 1700

Location	Opening times
Marina Centre Marina, Lowestoft, NR32 1HH	Tuesdays and Thursdays: 10:00 to 16:00
Lowestoft Library Clapham Road South Lowestoft, NR32 1DR	Mondays: 09:00 to 18:00 Tuesdays to Fridays: 08:30 to 18:00 Saturday: 09:00 to 17:00 Sunday: 10:00 to 16:00

2. The Lowestoft Tidal Barrier Scheme

2.1 Scheme Background and Location

Lowestoft is a coastal town located on the North Sea within the County of Suffolk in the East of England and has a population of 48,985 (East Suffolk, 2019). Lowestoft is susceptible to flooding from heavy rainfall events (pluvial), river flooding (fluvial) and from the North Sea (tidal). A number of factors can contribute to tidal flooding (eg. spring tides, storm surges, flooding via Oulton Broad during storm surges) however, the greatest events typically occur when spring (high) tides coincide with storm events.

Lowestoft is largely undefended from tidal flooding and is the largest UK coastal town with no formal tidal defences. As such, Lowestoft has been affected by a number of historic tidal flood events. A recent example in 2013 is shown in Plate 2-1 where 158 residential and 233 commercial properties were reported to have flooded in the Lowestoft and Oulton Broad area. This included 90 residential and 143 commercial properties in the low-lying central area of Lowestoft. In addition, tidal flooding resulted in the closure of key transportation links including Lowestoft railway station (see Plate 2-2) and the A12 / A47 through Lowestoft.



Plate 2-1: View of station square in December 2013 (credit: Paul Nichols).



Plate 2-2: View of Lowestoft railway station in December 2013.

In January 2017 severe flood warnings were issued for large parts of the east coast, including Lowestoft, when a tidal surge of approximately 2.1m was forecast to coincide with a high tide on 13th January. On that occasion, temporary defences, combined with a surge that was lower than predicted protected the town from serious flooding. It is anticipated that climate change will result in increased sea levels and more intense storms resulting in larger and more frequent extreme tides. This will increase tidal flood risk to Lowestoft in the future; it is estimated that 1,804 residential and 1,019 non-residential properties would suffer flooding if no works were undertaken.

As a result of the historic flooding and future projections, a number of strategic documents (set out in Chapter 2: Background, such as the Waveney District Local Plan) have supported the need for, and subsequent development of, tidal flood risk management in Lowestoft.

Currently a series of flood walls are under construction as part of the LFP project. These offer a level of flood risk protection up to 4.65m (or protection from a 1 in 200 year event in 2117), which is an improvement from current tidal flood events ranging from a 1 in 20 year (5% AEP) to 1 in 1000 year (0.1% AEP). This means that the defences will be capable of holding back high and extreme tides, up to the level of an extreme high tide which is predicted to occur on average, only once in every 200 years. At present, there is a break in the walls in the Inner Harbour Entrance Channel, which connects the Outer Harbour to Lake Lothing. Without completion of these defences with the construction of the tidal barrier, flood water would enter Lake Lothing through the Inner Harbour Entrance Channel and flood the areas surrounding Lake Lothing.

The areas at risk of tidal flooding are shown on Figure 2-2 which presents the tidal flood risk for Lowestoft without the tidal barrier. Figure 2-3 shows the flood extents with the tidal barrier in place.

Once complete, the Scheme will immediately deliver an improved level of tidal flood risk protection to 226 residential properties and 137 non-residential properties, with the number of properties protected increasing in the future, as noted above.

2.2 Description of the Scheme

The Scheme involves construction of a tidal flood barrier across the Inner Harbour Entrance Channel to Lake Lothing and the Inner Harbour of the Port of Lowestoft, approximately 40m downstream (east) of the Bascule Bridge and the long term inspection, operation and maintenance of a short length (approximately 35m) of the new tidal flood walls at the western extent of Hamilton Road. A visualisation of the barrier is shown on Plate 2-3. Short sections of temporary flood barrier known as demountable defences are required to connect the tidal barrier to the flood walls under construction as part of the wider LFP project. In addition to the barrier structure, a series of plant buildings will be constructed on the quayside adjacent to the barrier.



Plate 2-3: The proposed tidal barrier in the gate closed position (view looking east/seaward).

The tidal barrier will complete the tidal flood protection for Lowestoft, providing a 1 in 200 year standard of protection (ie. the probability of a given magnitude flood event or greater occurring in any given year) for overtopping in 2117, as explained in Section 2.1 above.

The Scheme is presented in Plate 2-4. It is designed to be closed at the onset of a tidal flood event and periodically as part of routine maintenance, including a monthly operational deployment check and from time to time to prevent silt from building up against the gate leaves when they are open.



Plate 2-4: Visualisation of the proposed 40m Barrier (note: some of the plant builds to be located on the quaysides are not shown).

The Barrier

The barrier is initially expected to be operated (due to a tidal flood event) on average once every three years, increasing due to sea level rise to once a year in 2070 and more than once a year in 2117.

The tidal barrier structure consists of two abutments on either side of the channel located within the existing inner piers, with two mitre gates which rotate inwards to form a barrier against the incoming tide. Plate 2-3 shows the barrier in the closed position. Each abutment is 37.5m long and 8.5m wide. The barrier elements will predominantly sit within the inner piers, with a high point that is approximately 5.5m above the existing ground level. A cill beam, which is a horizontal beam at the bottom of the tidal barrier, can be seen on Plate 2-4 which sits within the channel bed and spans the Inner Harbour Entrance Channel.

Plant Buildings

Plant buildings will house the main mechanical, electrical and ancillary equipment and the electrical plant room. These will be located on the North Quay and South Quay adjacent to the new north and south abutments. An electrical substation is required to be located on the North Quay within 15.0m of the electrical plant room and a standby diesel generator within an integrated acoustic enclosure and an internal fuel store will also be located on the North Quay close to the electrical plant room and electrical substation.

An emergency hydraulic power unit (used to operate the gates) will be located on top of each barrier abutment. These units will represent the highest point of the barrier, at approximately 5.5m above the existing ground level.

The primary location for the barrier control equipment will be within the Bascule Bridge Control Room. This will be controlled via a human-machine interface. The control panel display will provide all the necessary information regarding the status of the barrier gate and control equipment as well as key water levels across the Inner Harbour Entrance channel and Lake Lothing.

Access

Due to their temporary nature (i.e. they are only deployed when required), the use of demountable defences allows access to be maintained to the North and South Quays for the Royal Norfolk and Suffolk Yacht Club (RN&SYC), Associated British Ports (ABP) and National Highways. During deployment of the defences, access will be maintained to the Bascule Bridge Control Room and tidal barrier control equipment.

The working area and access required during gate operation is relatively limited. On the North Quay, it is confined to the barrier structure, the plant buildings and access between them and the Bascule Bridge Control Room. On the South Quay, it is confined to the barrier structure. It is anticipated that staff will access the North Quay with their vehicles through the port's main entrance off Waveney Road and park within existing parking alongside the Trawl Basin. Access to the South Quay will be via the RN&SYC access.

New Tidal Flood Walls at the Western Extent of Hamilton Road

As part of the operation and maintenance of the section of tidal flood wall at the western end of Hamilton Road a number of activities will need to take place to ensure the defences function as required. For the operation of the wall, a section of demountable flood barrier will be deployed across the entrance to the Kwik Fit Garage site in response to a tidal flood event and periodically as part of training or maintenance activities. Inspections and maintenance of the flood wall will be required periodically to ensure that it remains in the required condition.

The Barrier Construction

The barrier construction timeline has been informed by discussions with the port operator, ABP. The Scheme is to be constructed between 2025-2027:

- **Month 1 to Month 5** – Construction set up activity, including temporary crane platform installation.
- **Month 5 to Month 14** – Inner pier demolition, construction of cofferdams¹, creation of barrier abutment foundations and installation of cross channel piles².
- **Month 13 to Month 23** – Pouring of concrete base, walls and top slab for barrier abutments.
- **Month 23 to Month 26** – Completion of barrier abutment top sections, installation of concrete beam across the Inner Harbour Entrance Channel and installation of mitre gate.
- **Month 22 to Month 27** – North Quay and South Quay above ground works and demountable flood defences
- **Month 26 to Month 28** – Hand over.

The contractor appointed to carry out the works will follow good construction practice such as the establishment of working areas, site compounds and access routes. This will include scheduling work activities to minimise disruption to marine users and timing deliveries at less busy times of the day, to avoid congestion and disruption on the main roads through the town centre.

¹ A cofferdam is an enclosure built within a body of water to allow the enclosed area to be pumped out. This pumping creates a dry working environment so that the work can be carried out safely.

² Long steel sections driven deep into the ground.

3. Alternatives and Reasons for Choice of the Lowestoft Tidal Barrier Scheme

The need for strategic flood defences in Lowestoft has been recognised and recommended in a number of plans and strategies, since 2008.

East Suffolk is covered by the Suffolk Coastal Local Plan and the East Suffolk Council Waveney Local Plan. The plan covers the period 2014 – 2036. The plan outlines the need for strategic flood defence within Lowestoft and is essential to facilitate a number of other proposals. The Lowestoft area is expected to accommodate the majority of the district's development over the next 20 years. The key focus of the Local Plan is to continue the promotion of regeneration in Central Lowestoft and expand it to include the coastal areas of the town and beyond to Corton. Regeneration in Central and Coastal Lowestoft will deliver a significant amount of new housing as well as new economic development including new industry, retail and leisure.

Studies and analysis that support the need for strategic flood defence in Lowestoft include:

- Broadland Rivers Catchment Flood Risk Management Plan;
- Lowestoft Ness to Felixstowe Landguard Point Shoreline Management Plan;
- Lowestoft Transport Infrastructure Prospectus;
- Gorleston to Lowestoft Coastal Strategy;
- Lowestoft Tidal Barrier Feasibility Study;
- Lowestoft Flood Risk Management Strategy; and
- Lowestoft Flood Risk Management Strategy Strategic Environmental Assessment.

More recently, the Scheme has been identified as integral to the town's economic development and supports the UK Levelling Up agenda. Parts of Lowestoft suffer from high levels of deprivation (eg. the neighbourhood around London Road South and the A12 is the 25th most deprived neighbourhood out of 32,844 neighbourhoods on the English Indices of Deprivation measure³). The Scheme will reduce tidal flood risk and this will contribute to reducing social deprivation for those living and working in this and other areas, by providing confidence to local businesses, encouraging investment and growth in the local economy and creating a more viable and resilient coastal community.

3.1 Options Appraisal

The above strategic studies have driven the development of the proposals for the Scheme for which consent is now being sought. This chapter summarises the Scheme's development, options considered and outline design stage.

A number of investment objectives were defined early in the project and are as follows:

- To reduce the risk to residential and commercial properties from the effects of tidal flooding;
- To reduce costs associated with developing and insuring property within areas of Lowestoft susceptible to flooding;
- To provide a minimum standard of protection of a 1 in 200 year probability (0.5% AEP) against tidal flooding in 2117 to residential and commercial areas of Lowestoft;
- To provide businesses with the confidence to grow and invest in areas of the town which are currently not considered suitable for development (planning) due to the risk of tidal flooding;

³ English Indices of Deprivation 2019 - <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> (LSOA: Waveney 007D).

- To enable the development of key sites through the alleviation of direct flooding and protection of essential infrastructure; and
- Unlock and enable future investment in Lowestoft.

In response, a number of alternative options to protect Lowestoft were developed, as shown in Table 3-1.

Table 3-1: Options considered in the appraisal process.

Option	Benefits / disbenefits	Selected / rejected
Option 1: Do nothing – a required baseline option.	Included as a required option in the appraisal.	Shortlisted and rejected.
Option 2: Do minimum option - maintain the existing defences (an informal flood defence along the east side of the A47 Waveney Road).	Some flood risk benefit but reducing standard of protection over time as a result of climate change and does not respond to growth of the town.	Shortlisted and rejected.
Option 3: Construction of a flood walls only defence, including the perimeter of Lake Lothing.	Improves standard of protection but walls may restrict access to Lake Lothing. Some risk to unprotected properties at western end of Lake Lothing.	Shortlisted and rejected.
Option 4: Construction of a tidal barrier and flood walls to protect the Outer Harbour.	Improves standard of protection and provides protection to the port area but also restrictions on the use of the port during a surge event. Cost of Scheme would be significant due to size of barrier required improvements to Outer Harbour arms.	Rejected.
Option 5: Construction of flood walls and a 28m barrier at the Inner Harbour Entrance Channel.	Improves standard of protection but increased risk of ship impacts associated with the narrowing of the Inner Harbour Entrance Channel to 28m.	Shortlisted and selected.
Option 6: Construction of flood walls and a barrier at the location of the Gull Wing bridge (third crossing).	Improves standard of protection but cost of scheme would be significant due to size of barrier.	Rejected.
Option 7: Construction of temporary flood defences.	Improves standard of protection but only to 1 in 50 years and to limited areas. Will not enable growth nor significantly increase business confidence. Significant impact on business operations when deployed.	Rejected.
Option 8: Provision of property level resilience measures.	Limited standard of protection to individual properties where depth	Rejected.

Option	Benefits / disbenefits	Selected / rejected
	of flooding does not exceed 0.6m. Will not enable growth or significantly increase business confidence. Will not reduce the impact of flooding on transportation routes or other infrastructure.	

Based on the appraisal undertaken it was determined that the preferred option was the construction of a barrier on the seaward side of the Bascule Bridge combined with flood walls with a 1 in 200 year standard of protection. This was based on the technical, economic, environmental and social appraisal work undertaken.

The initial preferred option was for a 28m wide barrier. A series of navigation simulations were undertaken to assess the effect on navigation of the proposed 28m wide tidal barrier opening. This showed that the barrier affected the navigation situation significantly and detrimentally, particularly for larger, conventional ships making inbound/arrival transits through the Bascule Bridge. As a result, the tidal barrier opening was increased to 40m to keep the existing navigable width of the channel unchanged. The effects of this new option were considered, with the conclusion being that impacts would likely be consistent with those of the 28m barrier option. Thus, with a wider channel opening of 40m, a tidal barrier at the Inner Harbour Entrance Channel, together with flood walls, remains the preferred solution for tidal flood risk in Lowestoft.

3.2 Barrier Design

The preferred barrier design was identified during a study commissioned by Waveney District Council in 2015.

Six different barrier gate types were assessed for their suitability. Examples are shown on **Error! Reference source not found.** to **Error! Reference source not found.** and are described as follows:

- **Caisson gates.** These are a form of lock gate consisting of a large, typically steel structure that are usually filled with water to sink them and create a watertight area. There are four types of caisson gates: floating, bottom hinged, side hinged and sliding. All are single leafed gates that, once in position can be opened and closed with their respective mechanisms.
- **Mitre gates.** These are the most commonly known types of gate and have been used for several tidal barriers. They can be single leaf or twin leaf.
- **Rising sector gates.** These are semi-circular in shape and sit flat on the bed when in the open position. When closed, the gate is raised on a circular axis to hold back flood waters.
- **Vertically hinged sector gate.** These are typically the gate of choice when a tidal control structure is to be created, as they can resist a full water differential (ie. where the water level on either side of the gate is different) in either direction.
- **Up and over surge gate.** These involve the raising and lowering of a vertically mounted gate between two large towers that contain the lifting equipment.
- **Bottom hinged flap gate.** These are tilting gates that are raised from the cill level either hydraulically or with lifting wires.



Plate 3-1: Side hinged caisson gate at Bristol.



Plate 3-2: Double leaf mitre gates at Ipswich.



Plate 3-3: Floating sector gates in Yeongsan, South Korea.



Plate 3-4: Vertical hinged sector gate.



Plate 3-5: Up and over surge gate in Hull.



Plate 3-6: Bottom hinged flap gate in Kuwait.

Following consideration of the gate options against various technical, navigational and construction related factors, it was determined that a twin leaf mitre gate would be the most appropriate option. Given their established application, the fact that twin leaf mitre gates can be deployed quickly and that there is a mechanism for managing siltation risks were key factors in favour of this selection.

This type of gate comprises a relatively simple lattice of structural beams, with all parts accessible for maintenance, painting and inspection. The gate only functions in one direction and will only support a differential head of the sea level being higher than Lake Lothing. The gate cannot open against any significant differential head, meaning it would be necessary to wait for the tide level to fall to match the Lake Lothing level before opening the harbour entrance.



Plate 3-7: Mitre gates deployed against high surge.

4. Likely Significant Effects and Proposed Mitigation

The following sections summarise the likely significant effects associated with the construction and operation of the tidal barrier. In order to undertake the environmental assessments, we have collated and assessed information from a wide range of sources, using a range of techniques and models, for example:

- Hydraulic computer models of the harbour to understand flood levels today and in the future;
- Information on climate change to understand future changes in sea level;
- Review of ecological records;
- Survey information for ecological features and habitats;
- Mapping and ground level data;
- Navigation use studies;
- Historic records relating to changes to the coastline and use of the harbour;
- Ground investigations to understand potential contamination and the engineering properties of soil; and
- Consultation with key organisations and stakeholders, including landowners, members of the public and other interested parties to consider what they regard as key issues and priorities.

Assumptions across the Scheme, and details of the approach taken for each environmental topic area are summarised below.

4.1 Assumptions, Uncertainties and Exclusions

The environmental assessments within the ES are based on the Scheme proposals, construction methods and operational regimes as detailed in Chapter 6: Scheme Description.

It is acknowledged that, given the 100 year design life of the barrier, baseline conditions will alter in future years. Climate change is the key consideration when assuming future baseline conditions for this Scheme, and particularly the resulting effect of sea level rise. Whilst sea level rise has been considered within the modelling and design for the Scheme, and within the predictions made for future barrier operation, it is acknowledged that the longer the lifetime of a development, the greater the uncertainty about the impact of climate change over time.

Where there is a possible alternative design or a detailed design or construction solution is yet to be finalised, the impact assessments presented in Chapters 8 to 17 assess the 'worst realistic case'.

Both the barrier structure and the 35m length of tidal flood wall on Hamilton Road will require future maintenance and refurbishment works throughout its design life, the expected frequency and extent of which is described in Chapter 6: Scheme Description. Full details of these activities are not yet known and timescales are largely dependent on the performance and frequency of operation in future years.

4.2 Population and Human Health

The construction and operation of the Scheme has the potential to impact on population and human health. The population and human health assessment considers:

- Effects of the Scheme on the local economy, in relation to local businesses, port operations, including commercial boat users;
- Effects of the Scheme in relation to recreation and tourism, including the effects on recreational boat users; and
- Effects of the scheme in relation to human health.

The Scheme is situated within the Outer Harbour of the Port of Lowestoft. The Port is a key part of the town's economy, particularly in support of the UK Offshore renewables sector. There are also numerous recreational marinas and boat users located around the Inner Harbour (Lake Lothing). In the Outer Harbour the Yacht Basin is home to the RN&SYC and houses the Royal National Lifeboat Institute (RNLI) lifeboat. The Mincarolo trawler museum is also docked in the Yacht Basin within the Outer Harbour. Surrounding land uses include residential areas and commercial areas, with shops, bars and restaurants. South Pier has a number of recreational uses and there is also Lowestoft South Beach & Royal Plain just south of the Scheme.

Methodology

The assessment of effects has been informed by guiding criteria to establish the sensitivity of the receptors and the magnitude of the impacts from the Scheme during construction and operation. This has been informed by consultation with landowners, local businesses and other stakeholders to understand potential impacts.

Construction Effects

Construction of the tidal barrier is programmed to last for over two years, although the periods of activity for certain particularly noisy construction activities, such as piling and concrete pours for example, would be shorter. During construction a range of measures will be undertaken to minimise the impact on the local community. It is likely that construction and associated channel closures would have significant effects on boats users accessing the inner and outer harbours. Discussions on mitigation, timings and extents of the closures are still ongoing and the project is working closely with affected landowners and businesses.

There will be moderate (significant) adverse socio-economic effects in relation to commercial and industrial users of the Port of Lowestoft and Port operations. This would occur through the loss of quayside to construction compounds for the duration of the works.

There will also be a moderate (significant) adverse residual effect on the RN&SYC and other recreational boat users during construction. Measures such as alternative boat storage and parking, alternative crane and fuelling provision and alternative mooring positions would provide mitigation for impacts, and the avoidance of Inner Harbour channel closures during the peak recreational season (between mid-July and the end of August) would minimise the impact on members of the RN&SYC and other recreational users of the port. The Yacht Club and other recreational users of the port would nevertheless still experience significant disruption during construction of the Scheme.

Operational Effects

During operation there would be a moderate to major significant beneficial effect on the local economy (including commercial and industrial enterprises, and RN&SYC) as a result of the reductions in flood risk. This would also have major significant health benefits through the reduced effects of flooding, which can impact on people's mental health.

When the barrier is closed, this would prevent boat passage from the Outer Harbour into the Inner Harbour and vice versa. It is anticipated that the barrier would close once every three years for a storm event, although this would increase in frequency with climate change. There would also be regular, planned closures for maintenance and silt management, which would be for short durations. It is anticipated that as these would be communicated in advance, the effects could be managed and would not be significant.

4.3 Noise and Vibration

The existing ambient noise climate in the area of the works is dominated by road traffic noise from vehicles using the A12 / A47 and noise from seabirds. There are residential dwellings located to the north and south of the construction working area that are considered sensitive to noise and vibration, the closest being at Waveney Road, Station Square and Pier Terrace. The RN&SYC is also considered to be sensitive to noise and vibration and some of the port structures are also considered to be potentially sensitive to vibration.

Construction activities by their nature produce noise and vibration. The impact is highly site specific and depends on the proximity of works to residents and the type of construction activity being undertaken. In particular, piling, the installation of long steel sections deep into the ground, can cause noise and vibration.

Once built, the tidal barrier will not generate significant levels of noise or vibration. Therefore, noise and vibration during operation of the Scheme has not been considered further in the assessment.

Methodology

An assessment has been undertaken that is based on an estimate of the construction plant and equipment that will be used to build the Scheme. Calculations of noise and vibration levels during construction have been made for the closest residential dwellings and port structures. These calculated levels have been considered against measured baseline noise levels and British Standards to determine the impacts to residents and structures.

Construction Effects

Construction of the barrier is programmed to last for over two years, with different phases of construction following on from one another. During construction, some significant effects are reported, however, as listed below, the impact of construction on these receptors can be managed successfully and with a range of best practice measures, ongoing community engagement and advanced notice of particularly noisy works being given. Noise and vibration construction impacts and mitigation include:

- If cofferdam and abutment piling operations over-run into the evening and night-time and for scheduled concrete pours planned over 24hrs periods, exceedances of noise thresholds leading to significant observed adverse effect levels of noise will occur at Waveney Road, the corner of Commercial Road and the Railway Station, Station Square and The Harbour PH.
 - Mitigation: the contractor will keep a record of over-runs and in the event of the temporal threshold of 10 days or nights in any consecutive 15 days or nights period being reached (the threshold for defining significant effects), piling works will be stopped to prevent this being exceeded.
- The demolition of the RN&SYC Bosun's store building is predicted to give rise to significant observed adverse effect levels of noise.
 - Mitigation: the extent and duration of this activity is considered to be below the temporal scope of 10-days in a 15-day period, and as such would not result in a residual significant effect.
- Construction of the new boat crane on the South Quay (including piling) is predicted to result in significant effects.
 - Mitigation: use of temporary noise screens placed between the construction activity and the RN&SYC will reduce this to a non-significant level.
- Predicted levels of vibration on humans during vibratory piling will be above the significant observed adverse effect level at 21 residential dwellings, and therefore is predicted to result in a significant effect.
 - Mitigation: advance notice of this activity being given to these receptors will reduce this to a non-significant effect.
- The threshold for cosmetic damage would be exceeded during vibratory piling at four locations.

- Mitigation: The implementation of pile testing and a Vibration Management Plan will reduce this adverse impact to a non-significant.

Standard best practice measures are proposed to mitigate non-significant effects.

4.4 Biodiversity, Flora and Fauna

The effects of the Scheme have the potential to impact on statutory and non-statutory nature conservation sites and legally protected or otherwise notable flora and fauna. The flora and fauna are diverse covering both the terrestrial and marine environments with receptors such as migratory fish species, marine mammals, kittiwakes, benthic habitats and bats. The assessment focuses on the potential for significant effects during both the construction and operational stages of the Scheme and, where necessary, proposes mitigation measures to avoid, reduce or minimise effects.

Methodology

The assessment has drawn on existing records of habitats and species as well as undertaking dedicated surveys to understand baseline data conditions. Natural England, the Marine Management Organisation and the Environment Agency have been consulted to discuss and agree the approach to data collection and analysis. Many of the biodiversity interests are within sites of international and national importance for nature conservation and therefore have the benefit of legal protection. The reasons for the designation of the sites have been reviewed and taken into account in the assessments. Assessments have been carried out in accordance with ecological impact assessment guidance developed by the Chartered Institute of Ecology and Environmental Management.

Construction Effects

Many of the anticipated impacts to biodiversity will occur during construction. The significant impacts and proposed mitigation for the construction phase of the Scheme are summarised below. Once mitigation has been applied, no impacts will be considered significant.

- Disturbance to harbour porpoise as a qualifying feature of Southern North Sea Special Area of Conservation.
 - Significant effects of noise and vibration on harbour porpoise will be mitigated by implementing Joint Nature Conservancy Council Guidance including:
 - the presence of an experienced marine mammal observer on site during piling operations;
 - a 30-minute pre-piling search within a 500m radius of impact piling works to detect the presence of marine mammals with works delayed until 30 minutes has elapsed with no sightings within the 500m zone; and
 - soft start protocols to be agreed with the Marine Management Organisation for all impact piling operations through the water column.
- Damage to statutory and non-statutory nature conservation designated sites within the vicinity of the works from construction operations.
 - No specific mitigation measures are considered necessary but standard best practice will be employed, including the items below, which are proposed for non-significant effects:
 - Production of a Construction Environmental Management Plan;
 - Production of a Pollution Prevention Plan
- Disturbance to breeding kittiwake and/or destruction of nests during construction.
 - Prior to works commencing anti-bird nesting measures will be installed along suitable nesting locations on the Inner North and Inner South Piers to discourage kittiwake from nesting within the vicinity of the works;
 - To compensate for the loss of nesting habitat, ledges will be incorporated into the design within the order limits.

- Killing/injury of bats and damage/destruction of a roost if present within the Bascule Bridge Control Building.
 - A pre-construction survey will be undertaken on the Bascule Bridge Control Building. The survey will confirm the presence or likely absence of roosting bats to determine the most appropriate course of action to ensure legislative compliance.
- Damage/disturbance to benthic habitats and species under the footprint of the works and from construction operations.
 - No specific mitigation measures are considered necessary but standard best practice will be employed, including the items below, which are proposed for non-significant effects:
 - Production of a Construction Environmental Management Plan ;
 - Production of a Pollution Prevention Plan
- Introduction of invasive non-native species.
 - Compliance with the Exchange Standards contained in the International Maritime Organisation's Ballast Water Management Convention and carry a Ballast Water Management Plan and a Certificate of Compliance.
- Damage/disturbance to estuarine and marine fish within the vicinity of the works and from construction operations.
 - No specific mitigation measures are considered necessary but standard best practice will be employed, including production of a Construction Environmental Management Plan and a Pollution Prevention Plan, are proposed for non-significant effects;
 - Soft-start protocols put in place to protect cetaceans will reduce the potential for effects of noise and vibration on fish as set out above in relation to statutory designated sites of international importance.
- Damage/disturbance to estuarine and migratory fish within the vicinity of the works and from construction operations.
 - No mitigation measures other than standard best practice, including production of a Construction Environmental Management Plan and a Pollution Prevention Plan, are proposed for non-significant effects;
 - Soft-start protocols put in place to protect cetaceans will reduce the potential for effects of noise and vibration on fish as set out above in relation to statutory designated sites of international importance.
- Damage/disturbance to estuarine and marine mammals (harbour porpoise and seal) within the vicinity of the works and from construction operations.
 - No specific mitigation measures are considered necessary but standard best practice will be employed, including production of a Construction Environmental Management Plan and a Pollution Prevention Plan, are proposed for non-significant effects;
 - Soft-start protocols put in place to protect cetaceans will reduce the potential for effects of noise and vibration on fish as set out above in relation to statutory designated sites of international importance.

Operational Effects

The operational effects of the Scheme are limited to potential effects on marine species only. These are summarised below. Once mitigation has been applied, no impacts will be considered significant.

- Passage of migratory fish.

- None required owing to frequency of barrier closures through operation and maintenance.

Opportunities

Biodiversity net gain will be incorporated into the detailed design for the Scheme. This will result in a 14.54% increase in biodiversity units against the baseline habitats present within the Scheme order limits.

4.5 Landscape and Visual Amenity

The Scheme has the potential to impact on landscape character and visual amenity. Landscape character and visual amenity impact assessments are separate, but related topics. The landscape character assessment relates to changes to the elements, features and patterns which together make up the landscape character as the receptor. The visual assessment relates to the change in the view from particular locations, referred to as the visual receptors.

The existing landscape is characterised by the harbour and the highway and the Bascule Bridge. To the south is the Royal Plain with the RN&SYC to the north of the square, a range of entertainment facilities and extending south to the promenade by the beach. To the north is the railway station and Station Square with its shops and cafes. The Bascule Bridge is dominated by highway features including gantries and signals.

There are a range of visual receptors within a defined visual envelope – the zone of assessed visual impact. They are a mix of residents, workers, amenity facilities and people using the roads, footpaths and public spaces.

Methodology

This assessment has predominantly followed the procedures set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition, Standards for Highways, Design Manual for Roads and Bridges, LA 107 Landscape and Visual Effects, Revision 2 and Design Manual for Road and Bridges LA 104 Environmental Assessment and Monitoring.

The National Character Areas developed by Natural England and local landscape character assessments undertaken by the Local Authority have been referenced. Due to the nature and scale of the proposed tidal barrier within the urban area of Lowestoft, both these assessments have been scoped out from the assessment as they consider the landscape at a larger scale.

The study area is the extent of the landscape character area likely to be affected by the Scheme and the zone of theoretical visibility. The study area has been established through site survey work and it focuses on the immediate area around the proposed barrier. The surrounding buildings and the barrier itself, which will sit low within the existing Inner North and Inner South Piers, has determined the extent of the zone of theoretical visibility.

Construction Effects

The character and quality of the South Lowestoft and Kirkley Conservation Area would be temporarily affected during the construction period with the intrusion of construction plant, machinery and construction activity.

The character of the site would be adversely affected in particular by the taller construction machinery such as piling rigs and cranes which would be visible across the local landscape character area. The presence of this type of plant would also be for a significant duration. There are limited opportunities for landscape and visual mitigation during construction with good practice measures by the contractor being the most effective mitigation.

Operational Effects

The Scheme, once operational, will not significantly affect the conservation area. The fundamental characteristics of land use, buildings, working harbour and as a busy thoroughfare are unaffected, with the tidal barrier sitting low down with the existing Inner North and Inner South Piers.

The new tidal barrier and ancillary buildings will be new features in the local landscape area. Their influence on the local landscape area will vary depending on whether the barrier is open or closed. When open, the barrier itself would generally sit within the piers. When closed, the barrier would be more visible, notably in the view from the Bascule Bridge where it would be in close proximity and dominant in the view east from the bridge.

4.6 Water, Geomorphology and Ground Conditions

The tidal barrier has the potential to impact on water, geomorphology and the ground. The coastal processes and geomorphology in Lake Lothing, the Outer Harbour and the Suffolk coastal water body are assessed, in relation to the Scheme. The assessment also considers the effects on groundwater, surface water, and ground conditions resulting from construction and operation of the Scheme. Potential changes associated with these assessment areas may impact on water quality and waterbody status (defined by the Water Framework Directive).

Methodology

The identification of potentially significant effects on the water environment has been derived from a qualitative, assessment using a wide range of desk-based sources. Sediment modelling has been undertaken to provide a quantitative approach to sediment transport and contamination.

The assessment has been undertaken with regard to best practice guidance produced by the Institute for Environmental Management and Assessment, National Highways and the Environment Agency.

Construction Effects

The following effects resulting from construction of the Scheme have the potential to affect the water environment:

- There is potential for a change in tidal flows resulting from channel narrowing due to the abutments and cofferdams that will be in place during construction. Channel deepening associated with dredging may also affect tidal flows;
- Seabed disturbance from the construction of cofferdams, dredging and piling activities is likely to result in increased suspended sediment concentrations within the water column;
- Disposal of dredged material is also likely to result in increased suspended sediment concentrations. The increase within the disposal site will be of similar magnitude to existing maintenance dredging;
- There is potential for elevated pollutant concentrations within bed sediments at the Colin Law Way compound leading to a potential impact to the Suffolk coastal and Bure & Waveney & Yare & Lothing water bodies from remobilisation of contaminants from dredging and disposal;
- The haul route, which will be established using existing infrastructure routes, to transport material from the main site compound to the barrier site, has the potential to result in accidental spillages or runoff of oils, chemicals, cement, or other construction materials. These may enter Lake Lothing via runoff or through existing drainage systems;
- Construction works taking place in and adjacent to water have the potential to affect water quality through spills and contamination. This may occur through the mobilisation of contaminated soils or the creation of new flow pathways;
- Excavations and piling have the potential to impact water quality and groundwater flows within the underlying aquifers. This may disturb bed sediment and create new flow pathways or mobilise contaminated sediment;
- Disturbance of land contamination during construction has the potential to impact human health. Pathways may include ingestion, skin contact on inhalation. Physical hazards in made ground such as metal or glass also have the potential to affect human health;
- Impacts to existing buildings and infrastructure may occur through damage from the ground gas regime being altered through construction activities; and
- Increased flood risk may result from the main site compound, which has the potential to reduce floodplain storage and change existing flow paths. In channel works may reduce flow conveyance.

Mitigation to be implemented to address these potential impacts, includes:

- Monitoring surveys;
- Production of a Construction Environmental management Plan and Surface Water Management Plan;
- Measures to manage sediments and stockpiles, including production of a Materials Management Plan; and
- Developing a Flooding Emergency Response Plan.

The construction impacts noted above are temporary and will result in no effects to the surrounding water environment once mitigation has been adopted and implemented.

Operational Effects

When operational, the tidal barrier will close when there is a risk of a peak tidal flood event. Closure of the barrier has the potential to cause the following effects:

- Changes in tidal flows resulting from the tidal barrier structures such as the abutments;
- Closure of the barrier has the potential to alter the tidal regime during surge events and maintenance. This could lead to changes in the tidal regime across the North Sea (neutral effect) and extreme water levels at the Inner and Outer Harbours (neutral effect) and Pakefield and Lowestoft North Denes Beach (slight effect);
- Periodic sediment management has the potential to increase suspended sediment concentrations and create a plume of sediments which could be transported offshore. This is dependent on the amount of sediment deposited over the period and the stage of the tides when this occurs;
- Barrier operation has the potential to result in changes to sediment deposition. Barrier closures may lead to changes in the volume of dredging required within the Inner Harbour entrance as storm surges carry sediment into the harbour (albeit, a neutral effect). Tidal flows will not be allowed into the Inner Harbour and Lake Lothing and less sediment will reach these areas during the closure. Reductions in tidal flows within the Inner and Outer Harbours will also see an increase in deposition rates;
- Dewatering of the abutments will be required periodically; this has the potential to affect physico-chemical indicators and increase concentrations of pollutants, if the water becomes stagnant. Discharge into the channel has the potential to impact water quality;
- Land contamination remaining after construction has been completed may present a risk to future land users. Exposure pathways may include accidental ingestion, skin contact or inhalation; and
- New flow pathways resulting from the Scheme have the potential to contaminate groundwater. Spillages during maintenance may also contribute to contamination of surface water or groundwater.

Mitigation to be implemented to address these impacts, includes:

- Sediment management during dredging operations; and
- Analysis and management of water arising from abutment dewatering.

There will be no significant effects on the water environment during operation, with mitigation in place.

Flood risk will be greatly reduced by operation of the barrier, as the largest risk to Lowestoft is tidal flooding. The barrier will be deployed to protect against tidal surges. There is unlikely to be any adverse impacts on any other forms of flood risk.

4.7 Historic Environment

The Scheme lies within an area which enjoys statutory protection as the South Lowestoft and Kirkley Conservation Area. As such, the Scheme has the potential to affect the 'character and appearance' of an area of known heritage significance. The assessment considers the significance of the heritage assets, and their associated settings, within the vicinity of the tidal barrier.

A range of heritage features have been identified in the 500m study area. There are 25 Listed Buildings, one Conservation Area and 91 non-designated heritage assets in the study area. Most non-designated assets relate to WWII features identified from documentary evidence and have no known surviving physical presence.

Methodology

The assessment draws on information from desk-based information, archaeological records and previous archaeological investigations for the Scheme. The chapter was informed by the National Heritage List of England (NHLE), Historic Environment Records (HER) as maintained by Suffolk County Council. The assessment presents an updated baseline to a desk-based assessment produced by Archaeology South East in 2018.

The assessment considers:

- Archaeological Remains – the material remains of human activity from the earliest periods of human evolution to the present;
- Historic Buildings – architectural or designed or other structures with a significant historical value; and
- Historic Landscape – the current landscape, whose character is the result of the action and interaction of natural and human factors.

Construction Effects

No significant negative impacts on cultural heritage assets have been identified during construction. Temporary impacts to the setting of Royal Norfolk and Suffolk Yacht Club, Grade II* Listed Building, a number of other Listed Buildings in the study area and the South Lowestoft and Kirkley Conservation Area are anticipated as a result of construction activities. These are considered to be no more than minor impacts during the construction phase.

Construction of the Scheme will not have any impact on the non-designated heritage assets.

There is a possibility for previously unknown archaeological remains to be present within the Scheme. Based on the results of previous investigations, the predicted value of such remains, if present, is likely to be low. Considering that the area of the Scheme has been used as a harbour and for industrial activities for decades, the overall potential for previously unknown archaeological remains to survive within the Scheme can reasonably be identified to be low.

Operational Effects

Once construction is completed, no significant negative impacts on cultural heritage assets are expected and the improved standard of coastal protection to the area will help preserve cultural heritage into the future, in particular the Royal Norfolk and Suffolk Yacht Club (grade II* listed building).

The Scheme will not alter the character of the historic landscape.

4.8 Transport

Traffic and transport impacts are primarily focused on the construction period when the majority of traffic movements will take place to transport materials and staff to and from the works sites. Once operational, the Tidal Barrier Scheme will have minimal impact on transport infrastructure due to the barrier's minimal staff requirements, outside of major maintenance periods. The Tidal Barrier Scheme will also offer an improved standard of flood protection to the road and public transport network.

Methodology

In defining the study area for the assessment of traffic and transport impacts, consideration was given to the primary routes and location to be impacted by traffic generated by the Scheme. The main routes for large construction traffic include the A47 and A12, with Denmark Road and Waveney Road also considered for car trips.

Traffic surveys for these areas were obtained from Suffolk County Council, undertaken in the middle to end of July 2015. Whilst this data is relatively old, it means that it is not affected by the reduced traffic levels during the Covid-19 pandemic and the following shift to higher working from home. The Gull Wing Bridge third crossing will also be operational when the construction of the Tidal Barrier begins, which is predicted to lower the traffic flows around the existing Bascule Bridge. This older data is therefore considered to provide representative conditions.

The traffic data was assessed to determine the impact of additional traffic to severance, delay, amenity, and safety, focuses on areas identified as sensitive to changes in traffic flows such as the Bascule Bridge and surrounding junctions. The assessment also considers the impact of parking displacement from the Associated British Ports (ABP) and RN&SYC grounds, due to the construction compounds in these areas.

Construction Effects

During the construction stage of the tidal barrier, some minor adverse impacts relating to severance, driver delay, pedestrian / cyclists / public transport delay, and safety are anticipated. These will cause impacts of minor significance at areas of high sensitivity. There will also be moderate impacts relating to the pedestrian / cyclist amenity and minor impacts from displaced parking. These will require mitigation measures to be implemented, as discussed in chapter 14 of the ES, to ensure the residual impact is minor. All impacts during the construction phase will be temporary (29 months maximum duration).

One of the key transport impacts is anticipated to be reduced parking provision, due to the displacement of vehicles which would normally park within the ABP and RN&SYC grounds, especially during the summer months when the area would also experience high demand for tourist parking. Alternative parking will be provided for RN&SYC in the Royal Green Car Park; traffic data shows that the car park should be able to accommodate public use alongside the displaced RN&SYC vehicles. Alternative parking for ABP is available within their existing grounds, around the Trawl Basin.

Operational Effects

Once operational, the Scheme will have a negligible impact on transport infrastructure. Periods of major maintenance will result in some minor impacts comparable to during the construction phase, but for a much shorter duration. The improved standard of flood protection to the road and public transport network will result in significant positive effects.

4.9 Navigation

The installation of a tidal barrier is likely to introduce changes to the navigable channel and temporary disruption to the existing navigational environment of the Port of Lowestoft. The port is used by both commercial and recreational vessels and is used for leisure activity, hosting several marinas for yachts and pleasure craft. Upstream of the Bascule Bridge there are multiple small-medium enterprises and marinas in Lake Lothing as well as in Oulton Broad adjacent to Mutford Lock. Within the Outer Harbour, the Yacht Basin is primarily used by the RN&SYC (the RNLI is also based here), the Trawl Basin by ABP Pilots and Hamilton Dock and Waveney Dock are used for mooring of fishing and survey vessels.

Methodology

A navigational impact assessment (NIA) has been undertaken which assesses the impact on navigation from the construction and operation/maintenance of the proposed tidal barrier.

The primary sources of information used to conduct the assessment were:

- Navigation Simulation reports (included in the ES as Appendices 15C and 15D);
- Results from numerical modelling;
- Knowledge of port operations gained from consultation with the Statutory Harbour Authority (ABP), the Harbour Master, and others with an interest in navigation;
- Publicly available information; and
- Consultation feedback received from navigation users.

The NIA has assessed navigational impacts on commercial and recreational traffic compared to the set baseline. It has considered a number of types of impact: safety, the environment, access and business/commerce and navigational risks (a Navigational Risk Assessment has been completed and is included as Appendix B to the Navigation Impact Assessment (Appendix 15A of the ES).

Acknowledging the many navigation users that could be impacted by the Scheme, the significance of effect has been assessed by categories of user. Receptor groups have been apportioned by geographical area within the study area, namely:

- Western end of Lake Lothing and Oulton Broad;
- Inner Harbour – North shore;
- Inner Harbour – South shore;
- Yacht Basin;
- Trawl Basin; and
- Outer Harbour including Waveney and Hamilton Docks.

The sensitivity of receptors has been established using professional advice, judgement or experience and, where appropriate and available, any publicly available data and consultation. The magnitude of impact has been classified based on the degree of disruption to a receptor group's operations.

Construction Effects

During construction, the following impacts are anticipated to occur.

Impacts on navigation:

- Closures of the Inner Harbour Entrance Channel of up to 3 weeks duration for a single construction work possession will temporarily remove eastern access to and from Lake Lothing.

- Constriction of the navigable channel width within the Inner Harbour Entrance Channel.

Impacts on commercial port operations:

- Small permanent loss of water space in the Trawl Basin.
- Temporary displacement of Port operations within the Trawl Basin including temporary loss of southern floating pontoon and western and north western quayside.
- Temporary loss of the Inner North Pier landing stage.
- Disruption to Port operations arising from the Inner Harbour Entrance Channel Closures (referred to above).
- Temporary loss of quayside space in the Outer Harbour to accommodate vessels from the Inner Harbour during channel closures.

Impacts on recreational navigation users:

- Loss of ability to access the North Sea during channel closures.
- Disruption to planned events such as regattas.
- Reduction in navigation users visiting Lowestoft and Oulton Broads from elsewhere in the UK and abroad.

Impacts on RN&SYC and other Yacht Basin users:

- Temporary reduction in available water space within the basin for movement and mooring of vessels.
- Temporary loss of yacht club moorings.
- Mooring pontoon layout changes.
- Temporary loss of yacht club boatyard facility and car parking.
- Small permanent loss of water space in the Yacht Basin north west corner.
- Displacement of the yacht club boat crane, refuelling and pump out facilities.
- Restriction on use of the jetty.
- Disruption to planned events such as regattas.
- Reduced ability to accommodate navigation users visiting from elsewhere in the UK and abroad.
- Disruption to boat trips out to the North Sea.
- Reduction in visitors to the Mincarolo heritage vessel.

Mitigating actions proposed to address these potential impacts include:

- Navigational aids for night-time approaches, protection piles for inbound vessels and training for ABP Pilots.
- Notification of channel closures in advance for the 3 week, 5 day and 1 to 2 day closures.
- Planned closures to be over the weekdays as far as possible, with no closures during the peak season for recreational users between mid-July and the end of August.
- Provision of additional berths within the Outer Harbour (Trawl Basin, Yacht Basin and LEEF East quayside) for use as layby berths during channel closures.
- Regular communication with ABP, the Broads Authority and highways authorities.
- Reconfiguration of moorings within the Yacht Basin to maximise available berthing space (including temporary relocation of the Mincarolo Lowestoft).
- Installation of a new boat crane for use by RN&SYC and other users of the Yacht Basin (including RNLI).

- Access to a slipway to facilitate RNLI access to the Inner Harbour for rescues.
- Provision of a temporary floating fuel dock facility and a pump out boat within the Yacht Basin.
- Provision of a temporary pontoon along the north side of the Trawl Basin.

The Scheme's design, approach to construction and mitigation measures seek, where reasonably practicable, to avoid and minimise impacts on users of the navigation channel, nevertheless for some users, residual adverse effects are still expected to arise. These are unavoidable given the need to carry out the proposed works within the navigable channel, however they will be temporary in nature.

Operational Effects

During operation, impacts include:

- Non-significant impacts from regular planned closures whilst the Bascule Bridge is normally down.
- Up to 12-hour channel closures during barrier deployment for tidal flood event or during planned quarterly test closures.
- Impacts from planned intermittent major maintenance interventions similar to those for construction but only those that relate to closure of the Inner Harbour Entrance Channel for up to one week:
 - Disruption caused by waterborne construction activities and occupation of water and quayside space in the Trawl and Yacht Basins.
 - Temporary loss of quayside space in the Outer Harbour to accommodate barrier gate and hydraulic cylinder replacement/refurbishment.

As mitigation for the above impacts, the following will be implemented:

- navigational aids will be in place and will include lighting and fendering along the faces of the barrier gates.
- Prior to each barrier closure, notice of all temporary restrictions to navigation through the Inner Harbour Entrance Channel will be provided.
- For major maintenance interventions, similar mitigation to construction will be implemented.

With mitigation in place, it is considered that there will be no significant residual effects on navigation users. Residual effects will occur for ABP, as a result of scheduled maintenance and dredging activity and major maintenance operations (however these are planned only take place every ten years). There will be a major beneficial impact as a result of the reduced risk of flooding of the quaysides within Lake Lothing during tidal surge events and protection of the adjacent infrastructure, plant, equipment and materials from flood damage.

4.10 Air Quality and Climate

The Scheme has the potential to impact on air quality at sensitive human and ecological receptors. These potential impacts could arise from dust emissions during the construction phase. Air quality impacts from the operation of the Scheme were scoped out.

The Scheme also has the potential to affect the climate by causing (either directly or indirectly) the emission of greenhouse gases (GHGs) into the atmosphere, both as a result of its construction and throughout its operational life.

Methodology

Air Quality

The construction dust risk assessment has been carried out in accordance with the Institute of Air Quality Management (IAQM) *Guidance on the assessment of dust from demolition and construction* and considers three separate dust effects:

- Annoyance due to dust soiling;
- Harm to ecological receptors;
- Risk to health

Climate

The GHG emissions for the construction and operation of the Scheme were calculated using the Carbon Tool (Version 6) published by the Environment Agency for use in capital delivery of flood risk and coastal management projects.

For construction, the assessment included quantifying the GHG emissions embodied in products and materials, and GHG emissions associated with the transport of materials and people to and from the site, energy and fuel use during construction and from waste materials and transport. Examples of operational GHG emissions calculated using the tool include the planned maintenance and anticipated repair, refurbishment and replacement of the various components and assets which form the Scheme.

Construction Effects

Air Quality

The proposed demolition, earthworks, construction and construction vehicle movement activities are predicted to be a medium to high risk for potential dust soiling impacts. With regard to human health impacts, there is predicted to be a negligible to medium risk for all stages of the Scheme.

Good practice dust mitigation measures would be needed to reduce the potential for dust emissions to lead to adverse impacts in the vicinity of the Scheme. With the effective implementation of the mitigation measures, the effect on air quality is concluded to be not significant.

Climate

The proposed construction of the Scheme is anticipated to result in GHG emissions of approximately 11,900 tonnes carbon dioxide equivalent (tCO₂e). This represents a very small percentage change in GHG emissions in relation to existing GHG emissions locally, regionally and nationally, and is not anticipated to impact on the UK government's ability to meet the respective carbon reduction targets. Given the importance of reducing GHG emissions to meet GHG reduction targets, mitigation measures relating to the use and management of materials and the reduction of GHG and energy consumption are proposed to reduce emissions as far as practicable.

Operational effects

Climate

As was indicated for the construction phase, the proposed operation of the Scheme is anticipated to result in a very small percentage change in GHG emissions in relation to existing GHG emissions and the carbon budgets. The estimated total GHG emissions associated with the operation of the Scheme over the 100-year appraisal period is approximately 13,100 tCO₂e, which equates to an average annual emission of 131 tCO₂e per year.

There are opportunities to potentially reduce GHG emissions further and these could be investigated in more detail during the barrier's detailed design.

4.11 Cumulative Effects

This assessment considers the following types of cumulative effects:

- Intra project cumulative effects: where receptors are affected by more than one type of impact as a result of the Scheme; and
- Inter-project cumulative effects: where receptors affected by the Scheme are also affected by other plans or projects.

Methodology

The study area for assessment of intra-project effects is as set by individual topic chapters. Intra-project cumulative effects were identified where a review of topic chapters identified a receptor that was affected by more than residual effect.

The study area for inter-project effects was a zone of 2km from the Scheme, although Nationally Significant Infrastructure Projects (NSIPs) located more than 2km from the Scheme were also considered. Small scale commercial, agricultural or domestic projects were excluded at this point, as well as developments of less than 50 dwellings and projects which had either (i) no overlap in construction period with the Scheme or (ii) no potential for in-combination operational phase effects due to the nature of the project. This process produced short list of projects for consideration, which were then examined in terms of potential pathways through which the residual effects of the project and the residual effects of the Scheme could interact, total change in environment brought about by each in-combination effect, and whether this combined effect would result in an increased level of significance when compared to the residual effect of the Scheme alone and/or require additional mitigation measures.

The significance of cumulative effects was determined based on the value of receptor affected and the duration of the impacts (temporary or permanent). Permanent effects on receptors of moderate or high value, and temporary effects on receptors of high value, are considered to have moderate or major significance.

Intra-project cumulative effects

The following intra-project cumulative effects have been identified:

- Negligible adverse (not significant) effect on benthic habitats arising from construction related residual effects associated with loss of habitat, disturbance due to dredging and risk of water pollution;
- Slight adverse (not significant) effect on estuarine/marine and migratory fish arising from construction related residual effects associated with dredging and underwater noise and vibration; and
- Moderate adverse (significant) effect on humans associated with impacts on navigation for commercial and recreational vessels, traffic disruption and driver stress, noise pollution, risk of exposure to solid and water contaminants and vulnerability to flood events during construction.

No additional mitigation over and above that set out in individual topic chapters has been identified for the significant adverse effect on communities detailed above, however of key importance in minimising the disruption experienced by local communities will be the appointment of a Community Liaison Officer who is available to discuss the Scheme with residents and businesses and liaise with the Contractor minimise or avoid adverse effects and allay concerns.

Inter-project cumulative effects

The following inter-project cumulative effects have been identified:

- Additional vessel movements in and out of the Port of Lowestoft once the LEEF and East Anglia TWO and East Anglia THREE projects are operational would increase the magnitude of effect on this receptor during construction, however the significance of the cumulative effect is still considered moderate

adverse (significant) due to its temporary nature. Operational effects associated with the barrier closures for maintenance and when flood events are predicted are assessed as having a minor adverse (not significant) cumulative effect; and

- Competition for construction workers and pressure on construction workers and materials supply between the Scheme and Sizewell C nuclear power plant project may also occur, although it is not possible to assign significance to this effect due to uncertainty around market and employment conditions at the time of construction.

It is recommended that the Project Proponents and Contractors for the Scheme and for the LEEF, Anglia TWO, Anglia THREE and Sizewell C nuclear power plant projects liaise further to better understand how the inter-project cumulative effects identified can be mitigated further using additional measures not already included within Chapter 8: Population and Human Health and Chapter 15: Navigation of this ES.

5. Conclusion

The Lowestoft Tidal Barrier Scheme is essential to the completion of the wider LFP project as supported by the strategic documents set out in Chapter 2: Background of the ES, including the Waveney Local Plan. The Scheme requires the construction of a tidal barrier and demountable flood defences to connect the flood walls (as part of the wider LFP project) across the Inner Harbour Entrance Channel.

The majority of the likely significant effects reported in the ES are of a temporary nature and are anticipated to arise during the construction period of the proposed barrier. This is due to the barrier being located in a complex busy interface between the urban environment of Lowestoft town and the Port of Lowestoft. For this reason, the construction of the barrier has the potential to affect many receptors. However, with mitigation measures implemented, many of the impacts to these receptors are substantially reduced.

During operation, the barrier has a number of key benefits:

- Better tidal flood risk protection to Lowestoft over the next 100 years;
- Supporting the UK Levelling Up agenda by contributing to reducing social deprivation for those living and working in the areas benefitting from better tidal flood risk protection and creating a more viable and resilient coastal community;
- Reducing the current burden on emergency services and other organisations in responding to tidal flood events;
- Allowing the development of brownfield sites within the Riverside Local Enterprise Zone and the Powerpark Local Development Order zone;
- Enabling the town of Lowestoft to deliver wider Government objectives for reducing the impacts of climate change by creating one of the UK's largest green energy hubs and supporting offshore wind in the North Sea and the new Sizewell C nuclear power station construction;
- Providing confidence to local businesses and encouraging investment and growth in the local economy;
- Reduce the impact of tidal flooding on local roads and business infrastructure including the strategic A12/A47 and telecommunications infrastructure; and
- Reducing the risk of tidal flooding to areas of the Port of Lowestoft located within the Inner Harbour area of Lake Lothing and to the Royal Norfolk and Suffolk Yacht Club.

These benefits outweigh the largely short-term construction impacts and as such, consent for the Scheme should be granted.

6. What happens next?

The Environmental Statement and supporting documents can be viewed at:

<https://www.eastsuffolk.gov.uk/lowestoft-tidal-barrier-TWAO-application> and electronic copies are available for inspection at the locations shown on page 5.

We have submitted our Environmental Statement to the Secretary of State (Defra) as part of the Transport and Works Act Order application.

Any objections to, or other representations about, the proposals in the application should be sent to arrive on or before Thursday 23 November 2023 to:

Secretary of State for Environment, Food and Rural Affairs

c/o Floods Casework Team

Flood and Coastal Erosion Risk Management Team

Department for Environment, Food and Rural Affairs

Seacole Block – Ground floor

2 Marsham Street

London SW1P 4DF

Or by email to: FloodsCasework@defra.gov.uk

An objection or representation MUST: (i) be received by the Secretary of State on or before Thursday 23 November 2023; (ii) be made in writing (whether sent by post or e-mail); (iii) state the grounds of the objection or representation; (iv) indicate who is making the objection or representation, and (v) give an address to which correspondence relating to the objection or representation may be sent. If you are sending your objection or other representation by e-mail, please provide a postal address.

The Secretary of State may make complete copies of any objections or other representations public, including any personal information contained in them, and will copy them to East Suffolk Council as the applicant for the Order.



To find out more about the Lowestoft Tidal Barrier, email or visit our website.



lowestoftfrmp@eastsoffolk.gov.uk

www.eastsuffolk.gov.uk

To view the Lowestoft Tidal Barrier TWAO Application Documents visit:

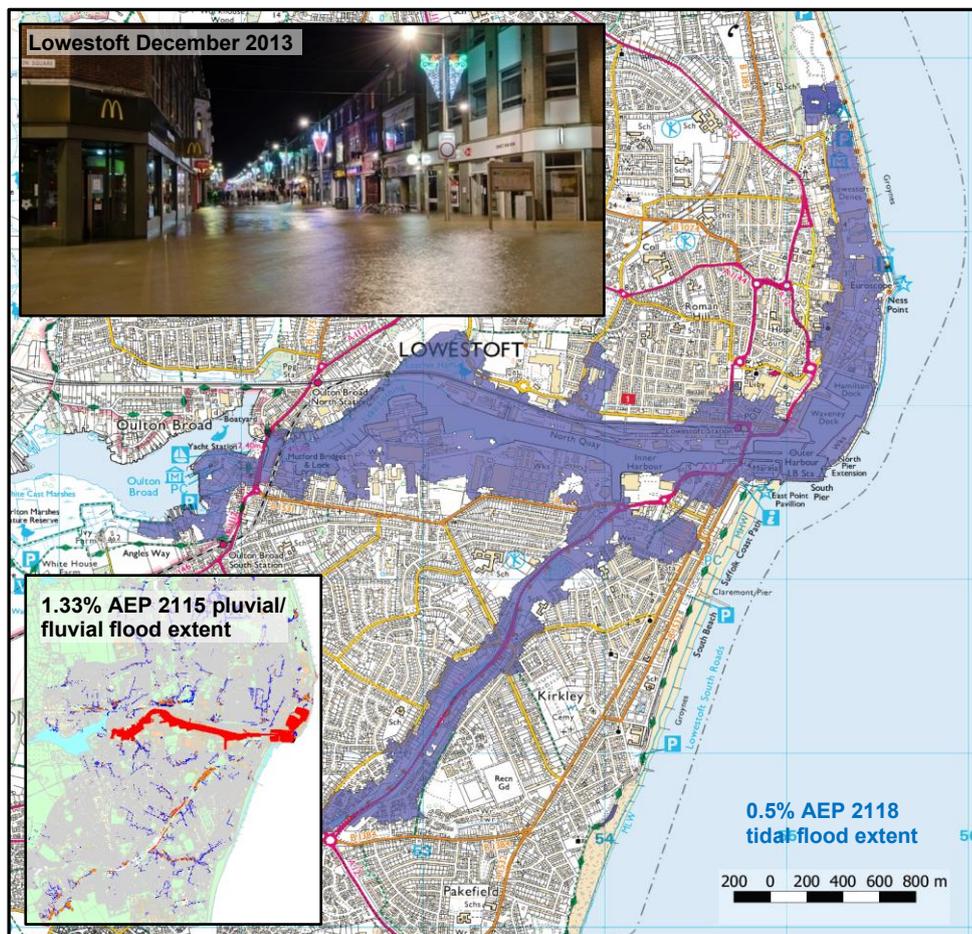
 **<https://www.eastsuffolk.gov.uk/lowestoft-tidal-barrier-TWAO-application>**

Lowestoft Tidal Barrier Order

October 2023

Lowestoft Flood Risk Management Project

RMA Outline Business Case



Version No: 2.3

Date: 8-11-22

Note: Updates to the body text of this OBC since the 2018 submission are coloured in blue text

BUSINESS CASE APPROVAL SHEET

1 Review & Technical Approval				
Project title	Lowestoft Flood Risk Management Project			
Authority project reference	57302/1301/30019	EA reference	AES503E/008A/006A	
Lead authority	East Suffolk Council	Date of submission	08-11-2022	
Consultant	Jacobs	Document stage (SOC/OBC/FBC)	OBC	
Previous document	Lowestoft FRMP SOC	Previous doc ref	V1.3	
Job title	Name	Signature	Date	
'I confirm that this project meets our quality assurance requirements, environmental obligations and Defra investment appraisal conditions and that all internal approvals, including member approval, have been completed and confirm we do not wish to apply for Grant in Aid or local levy funding for the tidal works at this stage.				
Authority Project Executive	Karen Thomas			
'I have reviewed this document and confirm that it meets the current business case guidelines for local authority and Internal Drainage Board applications.'				
Business case reviewer	Tamzen Pope			
'I confirm that the project is ready for assurance and that I have consulted with the Director of Business Finance'				
Area Flood & Coastal Risk Manager	Mark Johnson			
NPAS Assurance <input type="checkbox"/> Projects £100k - £10m (Tick the appropriate box)		Large project review group <input checked="" type="checkbox"/> Projects >£10m (LPRG)		
Recommended for approval				Date
NPAS or LPRG Chair				
Stage 1* project total as approved (£k)		Version number	V2	
Stage 1* project total made up of:	Capital Grant (£k)			
	Levy (£k)			
	Other Contributions (£k)			
2 Project Financial approval				
Financial scheme of approval	Project total	Name	Signature	Date
Director of Business Finance	All >£100k			
Director of Operations	£1m -£10m			
Executive Director of Operations	>£10m			
Chief Executive	>£20m			
3 Defra approval				
Date sent to Defra (or N/A)	NA	Version number (if different)		
Date approved by Defra (or N/A)	NA			

<p>Comments</p>	<p>Due to the change in the preferred option to a 40m Tidal Barrier through the Local Choice framework since the submission of the 2018 OBC and the resultant funding gap, the project team understand LPRG cannot provide financial assurance until a complete funding package is in place. Therefore ESC are requesting technical assurance from LPRG to allow ESC to pursue further discussions with other government departments and potential funders of the project.</p> <p>High level assessment of the additional costs with the 40m tidal barrier indicates that the total capital project cost is likely to be £171M compared to the current approved budget of £66.3M. This cost is subject to further detailed design development which is programmed to conclude in August 2023. Of the total £171M there is a large risk and contingency allowance as per national Treasury guidance for all capital flood risk schemes. There is also a significant inflationary allowance due to the economic climate. As such our current scheme costs excluding risk and inflation are £101M leaving a £43-113M funding gap.</p> <p>Despite the increased cost of delivering the local choice option - the barrier costs are considered to be comparable with similar barrier projects around the country and reflect the complexity and challenge of delivering a major infrastructure scheme in the centre of a fully operational port.</p> <p>The 2022 OBC is being submitted now following discussions with Environment Agency staff at Area and National level. ESC have an opportunity to work with key stakeholders (Associated British Ports and the Royal Norfolk and Suffolk Yacht Club) to realise efficiencies in the delivery of the local choice option and technical assurance of the approach will assist in pursuing this opportunity.</p> <p>With regards to the current funding situation, specifically the availability of funding – your attention is drawn to Section 1.7 and the Financial Case.</p> <p>A significant element of environmental assessment is currently under way for the 40m tidal barrier and is currently in draft format and not at a suitable stage of development to be shared outside of the project team. Further details of these environmental assessments (including EIA and HRA) can be found in the 'Next Steps' detailed in Section 3.4 of this OBC</p>
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For FSoD Coordinator use only:

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Glossary / acronyms

Annual Exceedance Probability (AEP): The probability associated with a return period (T), e.g. event of return period 100 years has an AEP of 1/T or 0.01 or 1%.

Benefit Cost Ratio (BCR): BCRs are used to identify the relative worth of one approach over another. It is the ratio of the PV benefits to the PV costs for each option.

Business case report: A business case including a programme of works that supports a recommendation to implement a flood risk management project. The project is approved by the Environment Agency under the Financial Scheme of Delegation from Defra. The project plan is supported by technical appendices.

Do Minimum: An option where the Operating Authority takes the minimum amount of action necessary to maintain an asset. For many places, this means patch and repair works of existing defences with no replacement should the defences fail.

Do Nothing: An option used in appraisal to act as a baseline against which all other options are tested. It assumes that no action whatsoever is taken. In the case of existing works, it assumes for the purposes of appraisal that Risk Management Authorities cease all maintenance, repairs and other activities immediately. In the case of new works, it assumes that there is no intervention, and natural and other external processes are allowed to take their course.

Flood and Coastal Erosion Risk Management Appraisal Guidance (FCERM-AG): Defra guidance to Risk Management Authorities on the process for appraising flood and coastal defence projects to ensure best use of public money.

Flood & Coastal Risk Management Grant in Aid (FCRM-GiA): Government money allocated to Risk Management Authorities (Environment Agency, Local Authorities, Internal Drainage Boards) for capital works which manage and reduce flood and coastal erosion risk.

Flood Defence Asset: Any structure with the prime purpose to provide flood defence, e.g. culvert.

Fluvial: Relating to the flow in the river that originates from the upstream catchment and not the sea.

Flood Risk Management (FRM): By Risk Management Authorities to manage flood risk.

Gross Value added (GVA): Gross value added is the value of output less the value of intermediate consumption; it is a measure of the contribution to GDP made by an individual producer, industry or sector.

Incremental Benefit Cost Ratio (IBCR): Ratio of the additional benefit/cost for two options.

Lead Local Flood Authority: After flooding in 2007 the government commissioned a review, which recommended that "Local authorities should lead on the management of local flood risk, with the support of the relevant organisations" (The Pitt Review, 2008). This led to the Flood and Water Management Act (2010) and the set-up of Lead Local Flood Authorities (LLFA) who have new powers and duties for managing flooding from local sources, namely **Ordinary Watercourses**, surface water (overland runoff) and groundwater.

Maintain: Active intervention to keep defences at their current crest level.

Multi-coloured Manual (MCM): Provides techniques and data that can be used in benefit assessments.

National Government Departments': As listed in Section 2.7

New Anglia Local Enterprise Partnership (NALEP): Local Enterprise Partnership working to drive growth and enterprise in Norfolk and Suffolk.

Net Present Value (NPV): Stream of all benefits net of all costs for each year of the projects life discounted back to the present date.

National Planning Policy Framework (NPPF): Sets out the Government's planning policies for England and how they should be applied

Present Value (PV): Monetary value of ongoing or future costs, discounted to provide equivalent present-day costs.

Property Level Protection (PLP) – Measures installed at individual properties to provide resilience against flooding. Includes flood board, air brick covers and flood gates.

PV Benefits (PVb): Those positive quantifiable changes that a project will produce over its lifetime.

PV Costs (PVc): The cost for implementation of a particular scheme over its lifetime.

PV Damage Avoided: The economic damages avoided once an option has been implemented.

Scape: The National Civil Engineering and Infrastructure framework, managed by the Scape Group Ltd public partnership. An OJEU compliant framework open to any public body in the United Kingdom.

Standard of Protection (SoP): The design event standard, measured by Annual Event Probability (AEP), that an existing asset or proposed scheme provides.

Water Framework Directive (WFD): European Directive 2000/60/EC setting out approaches to river basin planning to help to protect and enhance the quality of surface freshwater (including lakes, streams and rivers), groundwaters, groundwater dependent ecosystems, estuaries and coastal waters out to one mile from low-water. Sets environmental objectives related to ecological, physico-chemical, chemical, morphological and hydrological quality.

Executive Summary

1.1. Introduction

In 2018 Waveney District Council as lead RMA partner with Suffolk County Council presented EA assurers with the Lowestoft Flood Risk Management Project (LFRMP) Outline Business Case (2018 OBC) as an integrated business case for the management of tidal, fluvial and pluvial flood risk for the town of Lowestoft.

The OBC followed the Strategic Outline Business Case (SOC) for the project that received a recommendation for approval from LPRG in May 2017 and approval from Waveney District Council's Cabinet in June 2017.

Technical assurance was sought from the Environment Agency's LPRG for the 2018 OBC which defined the preferred approach for management of tidal, fluvial and pluvial flood risk in Lowestoft. The 2018 OBC provided East Suffolk Council (ESC, previously Waveney District Council and Suffolk Coastal District Council) with this technical approval for the tidal walls work but not financial due to funding shortages at the time of the 2018 OBC. ESC have since sourced the funds to do the work however we also face the additional challenges of increasing costs and inflation associated with the pandemic and post-pandemic/Brexit/Ukraine-related supply chain and material cost increases.

As an RMA-led project, the OBC also sought to secure FCERM – GiA funding for the project. However, it was acknowledged that GiA funding would be conditional and subject to securing other regulatory consents/orders, legal and financial agreements. Financial approval was given for the fluvial and pluvial elements of the project but not granted for the tidal elements as the latter required a further, more detailed OBC. The pluvial fluvial elements of the project were completed in 2021 and therefore no further approvals are required for these elements of the project.

In support of the initial SOC, a Strategic Approach (Appendix M) was prepared to set out the strategic interactions between the different sources of flood and erosion risk to Lowestoft, establishing the approach to apportionment of benefits where they are shared between the sources of risk. This strategic approach document has been refreshed as part of the development of the 2022 OBC. The recommendations of the Strategic Approach remain substantially unchanged as a result of the review.

Technical assurance is now being sought from the Environment Agency's LPRG for this 2022 OBC which provides an update to the approach for management of tidal flood risk in Lowestoft through the identification of a local choice 40m tidal barrier option and updates to the economic assessment of options taking into account changes in appraisal guidance since the previous submission in 2018. Due to the increased material costs and inflation the preferred solution is unlikely to meet LPRG financial approval. As we have a significant funding gap of £113M as a worse case. We are undertaking additional Monte Carlo analysis to gain a more realistic risk allocation. We are also progressing an opportunity to deliver the Local choice Option on an accelerated consenting and construction programme (Option 9LCU) which will realise program savings resulting in cost savings of in the region of £10m in cash terms reducing the funding gap when compared to Option 9LCC. The cost of the 'local choice' option at £172M (Option 9LCC with AOB and 95%ile Risk allowances) is comparable with similar recent barrier projects around the UK. However, in this case there is a greater cost certainty due to the stage we are at in barrier design at this point in OBC submission. The 'local choice' option is not cost beneficial under current Treasury rules. It is, however the only workable option that will deliver flood risk reduction to complete the integrated flood scheme for Lowestoft and is the also agreed

in principle with the key landowner stakeholders, including ABP, allowing this project to progress at an accelerated rate from April 2024 for delivery in 2027.

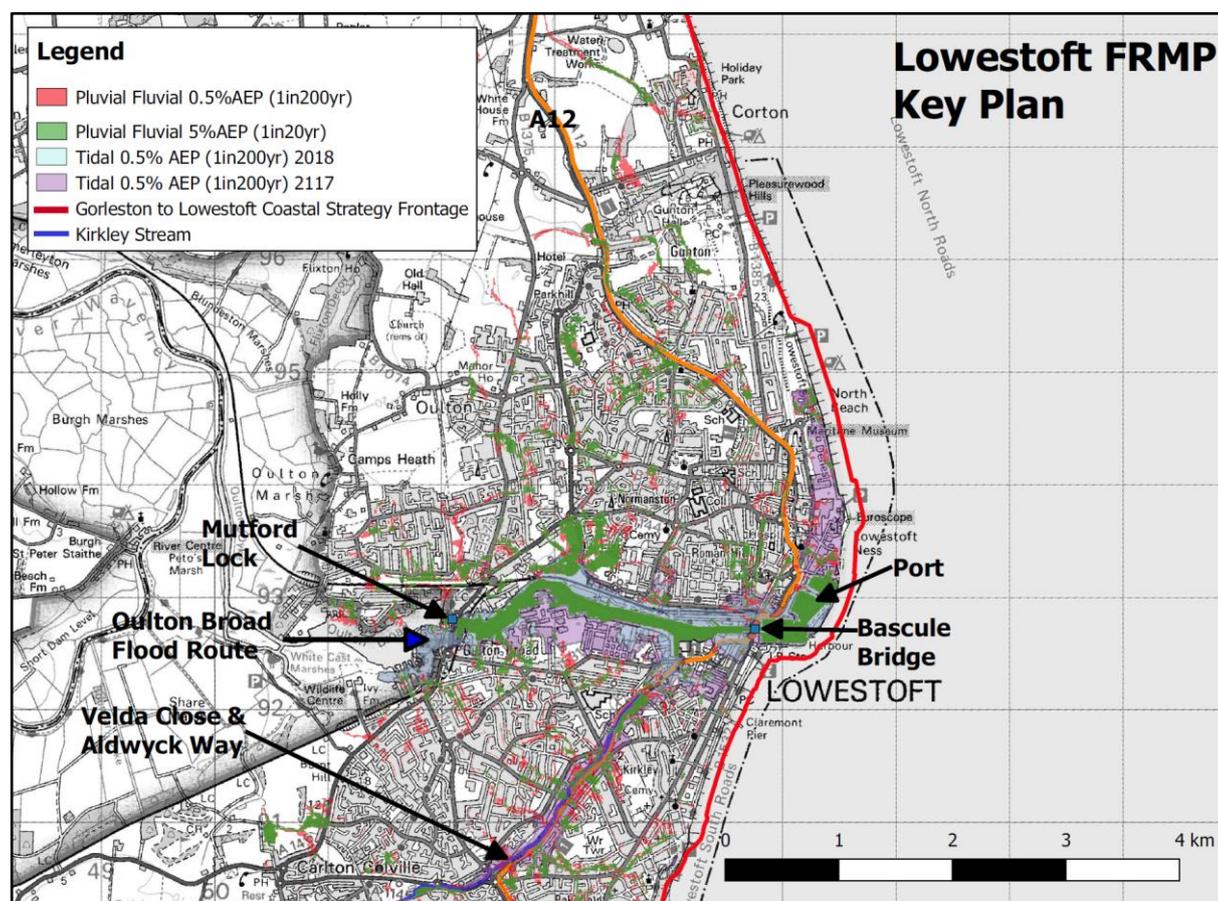
In addition to addressing the risk of all forms of flooding to vulnerable homes in a coastal town with no formal flood defences, a core outcome of the project is to support economic growth and regeneration by reducing the risk of tidal flooding to infrastructure, commercial land and businesses. An innovative approach is also required to deliver the project while minimising disruption to the Port of Lowestoft that serves the nationally important offshore and other energy sectors of national importance.

As a result, the majority of funding required for the preferred options is expected to come from partnership and other national funding sources. A comprehensive funding strategy has been further developed to secure the remaining partnership contributions required to deliver stage two.

The LFRMP is being developed by the following strategic partners:

- East Suffolk Council (ESC) – lead partner
- Suffolk County Council (SCC) – pluvial/fluvial lead
- Environment Agency (EA)
- Associated British Ports (ABP)
- New Anglia Local Enterprise Partnership (NALEP)

Key Plan



1.2. Strategic case

Strategic context

The main driver for investment is to reduce the risk of flooding (tidal, pluvial and fluvial) to residential and commercial property in Lowestoft. The December 2013 tidal surge event caused significant damage and disruption to the Lowestoft community/economy and it is considered that without intervention to manage these risks Lowestoft will not be able to develop and will probably go into decline.

Investment to manage tidal flood risk in Lowestoft is supported by the SMP2's policy of hold the line for the coastal frontage. The proposals are compatible with the recommendations of the Gorleston to Lowestoft Coastal Management Strategy.

The case for change

[Lowestoft is a town of multiple deprivation that has become increasingly vulnerable to flooding from all sources for many decades.](#)

At present Lowestoft does not have any formal tidal defences protecting the town and without intervention, it [has](#) become increasingly vulnerable to tidal flooding due to climate change. Lowestoft is currently considered to be at risk from the onset of flooding from tide levels with around a 1in5 (20%) to 1in10 (10%) Annual Exceedance Probability (AEP). A 1in200year (0.5% AEP) event (2018) would put approximately 221 residential and 373 commercial properties at risk of tidal flooding in addition to a number of locations earmarked for future development within the Lowestoft Local Plan

This situation gets significantly worse when the impacts of climate change are considered with the low standard of protection restricting the growth potential of the local economy with a 1in200 year (0.5% AEP) SoP being the standard considered by developers and the Local Planning Authorities to enable the majority of new developments.

The December 2013 storm surge event was between a 1in100 (1%) and 1in150 (0.67%) AEP event) and approximately 158 residential and 233 commercial properties were flooded in Lowestoft. The tidal flooding also resulted in the closure of key transportation links including Lowestoft railway station and the A47 through Lowestoft.

[To effectively manage risk of flooding from all sources in Lowestoft, ESC have developed a integrated Lowestoft Flood Risk Management Project. In 2021 we completed the fluvial and pluvial elements of this project and we have begun work on tidal defences as set out in our 2018 OBC. However, we now need to deliver a 40m tidal barrier to complete the integrated package of works. The lack of defences are suppressing the ability of Lowestoft to develop and grow and are not allowing the deprived areas of the town to "Level Up" as per wider Government outcomes. The lack of certainty of tidal flood risk is holding Lowestoft back and allowing social deprivation to remain a key issue for the town.](#)

[Construction of tidal walls have commenced along Hamilton Road \(completed 2022\) and Waveney Road \(still in progress\) with funding that was not contingent of the financial approval of the 2018 OBC. The submission of this 2022 OBC is aimed at securing the technical approval for the revised options and refreshed appraisal. This OBC has been developed using the guidance set out in the FCERM-AG \(Environment Agency 2021\) and Treasury Green Book guidance \(HMT 2020 with 2021 amendments\). Due to the fact the scheme is already well underway making it different to a standard OBC extensive consultation has taken place between the ESC and EA at both Area and National levels to inform this OBC and the development of the overall project.](#)

[The Lowestoft Flood Risk: Economic Footprint Impact Report \(Appendix F3\) REF 8 assessed the potential impact of flood risk on Lowestoft's current and future economic footprint. The study concluded that for a tidal event with a 1in200yr return period \(0.5% AEP which is similar to the 2013 surge event\) 30% of Lowestoft's](#)

existing Gross Value Added (GVA) is at risk of flooding and this rises to 62% with climate change if it remains undefended. This is discussed further in Section 3.7 of this OBC.

Including the notional FDGiA allocation, the project has secured commitments for £69,266,893 of funding to date. £62,176,439 is from partnership funding sources and includes;

- £10M from NALEP Growth deal
- £43,486,000 from HMG Green Recovery Fund

The GRF contribution was the largest capital allocation made nationally from the fund. Both allocations highlight the significant role the LFRMP has to play in supporting and enabling economic growth locally and nationally.

As evidenced in Appendix N1, a comprehensive funding strategy has been developed but a fully resourced plan is **no longer in place** due to the need for the 'Local Choice' barrier option and the rising inflationary cost of materials, supplies and resources that has happened globally in the last 2 years.

As the majority of the partnership funding requirement has related to the cost of delivering the tidal barrier while enabling the port to remain fully operational – the focus of our funding strategy now is to secure funds from other national sources by demonstrating the value of the scheme to at least 6 Government departments and their national outcomes.

Working with ABP's LEEF (Lowestoft Eastern Energy Facility) project team we have developed a unique programme opportunity to support their outer harbour expansion to allow greater green energy growth with wind and marine sector and meet the marine transportation needs of the national nuclear infrastructure project at Sizewell C (S₂C) to remove road transport pressures and reduce carbon through that route (in line with Government national policy).

The port is therefore poised for a significant economic shift and ABP have granted us full access to the navigational channel for 2 years if we can accelerate the LFRMP barrier project to commence in April 2024. Further cost reductions will likely be made as a result of this unconstrained access to the channel to build the barrier infrastructure both through the reduced programme timing and oncosts as well as the opportunity to buy materials earlier. This opportunity is time limited as the LEEF project will progress from 2024 regardless of the LFRMP.

The fast moving nature of this opportunity to build the barrier and support the LEEF project and EDF in the delivery of S₂C is therefore presenting the LFRMP project team with a unique opportunity to reduce flood risk to the town earlier and make cost savings. However we cannot commit to this accelerated programme fully without closing the funding gap of £113M and in parallel having greater national Government Departments support to maximise funding opportunities that may arise from the wider infrastructure delivery.

Objectives

The main objective of the LFRMP is to reduce the risk of tidal and pluvial fluvial flooding to residential and commercial properties in Lowestoft in a sustainable way that promotes economic growth and development.

Works to manage the risk of pluvial and fluvial flooding have been completed and therefore this objective has been partially met. Works to reduce the risk of tidal flooding are ongoing.

The project will deliver National Government outcomes for at least six Government Departments and contribute significantly to the growth of the economy.

The scheme aims to underpin the wider development of Lowestoft port as a central hub for marine and offshore industry notably supporting an accelerated delivery programme for ABP's LEEF project and as a marine transport hub for the Sizewell C nuclear power station (national infrastructure project).

1.3. Approach to economic cases

This OBC presents two separate economic cases for the tidal and pluvial fluvial flood risk elements. This approach has been taken to maintain a clear distinction between these sources of flood risk which are considered to have a low probability of combined occurrence with an insignificant overlap in the benefit areas of the respective preferred options.

This approach also enabled a two-stage approach to delivery of the project and helped safeguard the delivery of pluvial fluvial OM2's within the last 2015-2021 FCERM six-year programme.

1.4. Economic case – Tidal

Options considered

Table 1.1 summarises the tidal options appraised in this OBC, identifying the options taken forward to the short list.

Table 1.1 Tidal options considered

Option	Description	Benefits delivered /Issues involved	Reason for shortlist or rejection
1	Do Nothing	No Benefits – reduced SoP when informal defence along A47 is not serviceable, climate change impacts are considered and increased damages when no flood warning service provided. Does not promote growth.	Shortlisted as baseline economic case
2	Maintain - Do minimum	Some benefits – SoP reduces as climate change impacts, continued flood warning. Does not promote growth	Shortlisted as green book requirement.
3	Improve – flood walls only	Improves SoP to the majority of the strategy area – Mutford lock end still subject to flooding from the Broads' system in tidal surge event. Walls along inner harbour quays may restrict operational usage of some quaysides. Hydraulic modelling indicates some increase in flood risk to unprotected property at western end of Lake Lothing.	Shortlisted to test the feasibility of a non-barrier option.
4	Improve - Outer Harbour barriers and walls	Can provide the required standard of protection. Provides protection to the port area but also restrictions on the use of the port during a surge event.	Rejected due to: Significant cost of two large tidal barriers, significant improvement works to harbour arms, significant impact on ports operations during and post construction including losing its classification as a Safe Haven.
5	Improve – 28 metre Bascule Bridge barrier and walls	Improves SoP to the majority of the study area – Mutford lock end remains at risk of tidal flooding from the Broads' system. Issues include: likely ship impacts (and associated costs and environmental effects of repairs) due to a narrower navigation channel compared to Option 9, as predicted by navigation simulations completed in 2021.	Shortlisted. As a tidal barrier option seaward of the Bascule Bridge. Early indications from business and public consultation is that this option meets with public approval. Identified in the 2018 OBC as the preferred option.

Option	Description	Benefits delivered /Issues involved	Reason for shortlist or rejection
6	Improve – third bridge crossing barrier and walls	Improve SoP to the majority of the strategy area – Mutford lock end remains at risk of tidal flooding from the Broads’ system. Issues include: timing of project implementation, costs and navigation impacts.	Rejected. Third crossing is already being built. The 2018 OBC concluded that even with the potential efficiencies of the combined approach, the capital expenditure associated with such a wide barrier structure far exceeded that of the Bascule Bridge barrier, and makes Option 6 unaffordable.
7	Temporary flood defences only	Improves SoP to limited areas of the strategy area. Will not enable growth nor significantly increase business confidence. Significant impact on business operations when deployed.	Rejected as a long-term solution due to: Low standard of protection (1in50 year (2% AEP) SoP in 2018) feasible, high long term operational costs, increased risk of failure or outflanking and lower levels of reliability when compared to permanent defences. Does not enable growth. Cannot readily keep up with climate change impacts and therefore cannot achieve the project objectives.
8	Property level resilience only	Limited benefits to individual properties where depth of flooding does not exceed 0.6m. Will not enable growth or significantly increase business confidence. Will not reduce the impact of flooding on transportation routes or other infrastructure.	Rejected as long-term solution due to: Depth of flooding means that for the majority of properties, this approach is not technically feasible, does not enable growth or protect infrastructure.
9	Improve – 40 metre Bascule Bridge barrier and walls	A new option with a wider barrier was introduced for the 2022 OBC to reduce risk of ship impacts (and associated costs and environmental effects of repairs) compared to the 28m barrier in Option 5. Improves SoP to the majority of the study area – Mutford lock end remains at risk of tidal flooding from the Broads’ system.	Shortlisted. As a tidal barrier option seaward of the Bascule Bridge. Due to similarity with Option 5, this is considered to have similar levels of public approval. The increased barrier width also contributes to greater resilience and is less restrictive on future development of the Lake Lothing entrance channel.

Key findings

The economic appraisal was undertaken in line with the requirements of the Flood and Coastal Erosion Risk Management – Appraisal Guidance (FCRM-AG). The key findings of the economic appraisal are summarised as follows:

- The do-minimum option delivers very little benefit and does not meet LFRMP objectives and was therefore rejected as a viable option.
- Options 3a to 3d (flood walls only) do not achieve benefit cost ratios of greater than 1 and were rejected from further consideration under the decision rule.
- Options 5a to 5d (28m Bascule Bridge Barrier and walls) considered differing standards of protection from 1in75 year (1.33% AEP) to 1in500 year (0.2% AEP), all of these option permutations have Benefit Cost Ratios of 1.2.
- Option 5c (28m Bascule Bridge Barrier and walls 1in200 year (0.5% AEP) has been selected as the national economically preferred option with highest NSPV.

ESC have selected a Local choice 40m tidal barrier option (9LCC or 9LCU) as the locally preferred option. This option has been selected as it brings additional benefits that are not fully captured within the economic appraisal, including:

- Enabling economic growth and adaptive pathways for future development of the port and Lowestoft,

- Increasing the resilience and reliability of the barrier.
- Introducing a significant efficiency and acceleration of delivering the barrier.

The local choice options both have BCRs of less than 1 at 0.9 with a NSPV of £21m for option 9LCC and £15m for Option 9LCU

The main technical aspects that need further consideration as the project progresses towards delivering the tidal barrier are summarised as follows:

- Continued consultation will take place to consider the impact of the tidal defence system (construction and operational) on local businesses and navigation links. This will be fully considered as part of the TWAO application.

The key findings of the environmental assessment presented in the LFRMP Environment Report (SOC stage) and PEIR are summarised as follows:

- The Do-nothing and Do-minimum options do not support most of the SEA objectives and result in adverse and neutral effects on the geology and landscape SEA objectives.
- Option 5 (28 m Bascule Bridge barrier and walls) is supportive of most SEA objectives and is the environmentally preferred option at this stage. Option 9 is considered to be broadly similar to Option 5 (40 m Bascule Bridge barrier and walls).in terms of potential environmental impact
- An EIA will be required for the Tidal Barrier and is currently being developed.

The Habitats regulation assessment (HRA) undertaken confirmed that the preferred option would have no likely significant effect on European sites, Natural England have been consulted and agree with these findings. Potential impacts on the works on harbour porpoise have been scoped in for further consideration in connection with noise and vibration associated with delivering the tidal works. The Water Framework Directive (WFD) assessment concluded that preferred option is compliant with the WFD.

Preferred way forward

The option appraisal identified that the nationally economically preferred option for reducing the risk of tidal flooding to Lowestoft is Option 5c – 28m Bascule bridge barrier with tidal walls with a 1 in 200 (0.5%) AEP standard of protection. However, to deliver an increased level of resilience and lessen restrictions on potential future development as mentioned in the key findings above, a Local Choice option (Option 9 – 40m Bascule bridge barrier with tidal walls with a 1 in 200 (0.5%) AEP standard of protection) has been selected as the preferred option for managing the risk of tidal flooding in Lowestoft.

1.5. Commercial case

Procurement strategy

The technical delivery of the LFRMP OBC has been procured through the SCAPE Procure framework by ESC who are acting as the lead partner in the LFRMP. This procurement route enables the continued delivery of projects arising from this OBC without the need for any further procurement of technical services by ESC.

ESC have procured a number of other technical services utilising the Scape Perfect Circle framework. These services include technical advisor, ECC project management, site supervision and cost management support.

Key contractual terms and risk allocation

The key commercial and legal agreements that need to be progressed to enable the development of the preferred options for the management of tidal and pluvial fluvial flood risk identified in this OBC are summarised as follows:

- Landowner agreements;
- Transport and Works Act Order (TWAO) application and associated agreements;
- SCAPE risk share arrangements;
- Risk share agreements with partnership funders.

During the development of the OBC work has commenced to develop and put in place a number of legal agreements with key stakeholders and landowners, these include a number of tripartite agreements where required. Legal agreements are required to following key areas:

Tidal works

- Access for construction and future operation and maintenance;
- Operation and maintenance agreements;
- Rights to site structures on privately owned land;
- Storage of demountable barrier and associated;
- Funding agreements.

[A number of the legal agreements relating to the tidal walls are already in place, with others in an advances state of development.](#)

Efficiencies and commercial arrangements

Project efficiency targets are aligned to the requirements of the partner organisations, the SCAPE framework and funding sources. An efficiency register (CERT) has been developed for the LFRMP.

1.6. Financial case

Summary of financial appraisal

Table 1.4 summarises the whole life cash cost spend profile for the tidal preferred option. The costs presented include 95% risk and adjusted optimism bias allowances. Option costs have been developed through detailed contractor costing exercises and use of the EA's whole life costing tool where appropriate. Costs are based on [detailed designs for the preferred Local Choices option. It should be noted that a small element of the future O&M costs associated with completion of the tidal walls, forecast for late 2023 is not currently shown in the table.](#)

Table 1.4 Preferred option whole life spend profile (cash)

Annualised spend profile (£k cash)	Sunk	Yr 0	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7 +	Yr 8 +	Total	
	Pre 21-22	22 - 23	23 - 24	24 - 25	25 - 26	26 - 27	27 - 28	28 -29	29-30	30-31		
Stage 1 - Tidal Walls												
Authority staff costs - Stage 1	2,027	1,374									3,401	
External fees - Stage 1											0	
Construction costs - Stage 1 Tidal Walls		10,413										10,413
Risk contingency (95%ile) - Stage 1		458										458
Optimism Bias - Stage 1		1,882										1,882
Inflation - Stage 1		0										0

Stage 1 Subtotal	2,027	14,127	0	0	0	0	0	0	0	0	16,154
Stage 2 - Tidal Barrier											
Authority staff costs - Stage 2		1,639	397	397	397	397	397	397	397		4,419
External fees - Stage 2 (including TWAO)			1,217	1,217	977	977	977	977	977		7,316
Construction costs - Stage 2 Tidal Barrier					15,018	15,018	15,018	15,018	15,018		75,092
Risk contingency (95%ile) - Stage 2		847	847	847	10,166	10,166	10,166	10,166	10,166		53,371
Optimism Bias - Stage 2					751	751	751	751	751		3,755
Inflation - Stage 2		0	20	40	1,260	1,702	2,154	2,618	3,093		10,887
Stage 2 subtotal	0	2,486	2,481	2,501	28,570	29,011	29,463	29,927	30,402	0	154,840
Stage 1&2 sub total	2,027	16,613	2,481	2,501	28,570	29,011	29,463	29,927	30,402	0	170,995
O & M and Future Costs											
O&M and other future costs										59,951	59,951
Optimism Bias - future works										17,985	17,985
Future costs sub total	0	0	0	0	0	0	0	0	0	77,937	77,937
Total costs	2,027	16,613	2,481	2,501	28,570	29,011	29,463	29,927	30,402	77,937	248,932

Funding sources

Delivery of the LFRMP objectives requires further partnership funding contributions. The LFRMP Funding Strategy document (Appendix N1) sets out the planned approach to ensure sufficient funding is available for the project. Multiple sources have already been secured, which has enabled the progression of the project with funding secured / allocated for the project from the following organisations:

- East Suffolk Council
- Suffolk County Council
- Regional Flood and Coastal Committee (Local Levy)
- Environment Agency (administering FCERM-GiA and COVID cost impact funding)
- New Anglia Local Enterprise Partnership
- HM Government (Green Recovery Fund / 'Summer Economic Funding', 'Other Government Funding')
- Department for Education

The funding strategy had secured funding to enable the delivery of the Stage 1 tidal and pluvial fluvial elements of the LFRMP and the 28m barrier option. However, the 40m 'local choice' option and the cost uplift caused by Brexit impacts, inflation, the COVID-19 pandemic and extended landowner negotiations means that further funding is required to deliver the Stage 2 element (tidal barrier). Table 1.5 presents a summary of the funding status of each stage of the LFRMP, identifying funding secured and where further partnership funding is required.

Table 1.5 Funding summary table

Annualised funding needs (£k)	Pre 21-22 (sunk)	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	Total
Stage 1 – Tidal Walls										
New Anglia Local Enterprise Partnership (LEP)	10,000	-	-	-	-	-	-	-	-	10,000
East Suffolk Council	-	-	-	-	-	-	-	-	-	-
Green Recovery Fund	-	7,795	-	-	-	-	-	-	-	7,795
OGD Funding	-	-	1,400	-	-	-	-	-	-	1,400
COVID impacts funding	-	1,198	-	-	-	-	-	-	-	1,198
Stage 1 Tidal Walls - Identified funding	10,000	8,993	1,400	-	-	-	-	-	-	20,393
Partnership Funding Required	-	-	-	-	-	-	-	-	-	-
Stage 1 Tidal Walls- Total funding	10,000	8,993	1,400	-	-	-	-	-	-	20,393
Stage 1 – Pluvial Fluvial										
FCERM-GiA	1,492	-	-	-	-	-	-	-	-	1,492
Suffolk County Council (SCC)	3,000	-	-	-	-	-	-	-	-	3,000
Local Levy via RFCC	1,751	-	-	-	-	-	-	-	-	1,751
COVID impacts funding	385	-	-	-	-	-	-	-	-	385
Stage 1 Pluvial fluvial - Identified funding	6,628	-	-	-	-	-	-	-	-	6,628
Partnership Funding Required	-	-	-	-	-	-	-	-	-	-
Stage 1 Pluvial Fluvial - Total funding	6,628	-	-	-	-	-	-	-	-	6,628
Stage 2 – Tidal Barrier										
FCERM-GiA	-	-	-	-	-	4,186	-	-	-	4,186
Local Levy via RFCC	-	-	1,589	-	-	-	-	-	-	1,589
East Suffolk Council	-	-	250	250	250	250	-	-	-	1,000
Suffolk County Council (SCC)	-	-	-	-	-	-	-	-	-	-
Department for Education	-	-	-	-	-	-	200	-	-	200
Green Recovery Fund	-	2,500	656	2,266	28,494	1,775	-	-	-	35,691
Stage 2 Tidal Barrier - Identified funding	-	2,500	2,495	2,516	28,744	6,211	200	-	-	42,666
Partnership Funding Required	-	-	-	-	-	22,974	29,437	30,101	30,577	113,089
Stage 2 Tidal Barrier - Total funding	-	2,500	2,495	2,516	28,744	29,185	29,637	30,101	30,577	155,755

The funding requirements above are correct at the time of initial submission of the OBC (October 2022). Please note that the extract from the funding strategy above includes an allowance for construction costs associated with the Hamilton Road flood wall which is excluded from economic assessment included within this OBC. The construction costs for this flood wall were funded through the New Anglia LEP to provide flood risk reduction to the PowerPark enterprise zone with benefits attributed economic growth in the LEP business case (Appendix N2). Whilst the construction of the Hamilton Road flood wall falls within the scope of the LFRMP it has been removed from the FCERM economic assessment due to a disproportionate impact of the benefit cost ratio of all options. The limited FCRM benefits associated with this flood wall are separate and distinct from the FCERM benefits associated with the remainder of the tidal walls and barrier, it was therefore considered appropriate to remove this from the economic assessment.

Overall affordability

The delivery of the LFRMP is considered to be affordable **subject the securing additional partnership contributions** to support Stage Two of the project as set out in Table 1.5. The project team continues to develop the detail of the tidal barrier and this combined with detailed consultation with key stakeholders will enable the costs to be refined with the aim of reducing the funding gap. It is generally considered that the costs presented for delivering a tidal barrier for Lowestoft are comparable with other tidal barrier projects within the UK.

The project has applied a robust risk management approach to ensure that sufficient budget is allocated / funding is secured to enable delivery of the Local Choices

preferred option. Table 1.6 summarises the expenditure profile for delivering both stages of the **tidal flood risk management elements of the LFRMP**.

Table 1.6– Project initial capital spend profile (Cash)

Cash Cost (£k) (inc risk+inflation)	Sunk Pre 21-22	Yr 0 22 - 23	Yr 1 23 - 24	Yr 2 24 - 25	Yr 3 25 - 26	Yr 4 26 - 27	Yr 5 27 - 28	Yr 6 28 -29	Yr 7 29 - 30	Total
Stage 1 - Tidal walls	2,027	11,787								13,814
Stage 1 - Risk	0	2,340								2,340
Stage 1 - Inflation	0	0								0
Stage 2 - tidal barrier	0	1,639	1,614	1,614	16,392	16,392	16,392	16,392	16,392	86,827
Stage 2 - Risk	0	847	847	847	10,917	10,917	10,917	10,917	10,917	57,126
Stage 2 - Inflation	0	0	20	40	1,260	1,702	2,154	2,618	3,093	10,887
Total	2,027	16,613	2,481	2,501	28,570	29,011	29,463	29,927	30,402	170,995

1.7. Management case

Project management

The development of this OBC is being led by ESC as a Maritime Authority with responsibilities under the Coast Protection Act 1949 and their permissive powers under Section 14A of the Land Drainage Act (1991) as amended by the Flood & Water Management Act (2010). Support on the fluvial pluvial elements of the project will be provided by SCC as Lead Local Flood Authority under the Flood and Water Management Act 2010. ESC are supported by a number of partners and specialist suppliers in the delivery of this project. The Project is supported by four key groups:

- Project Board
- Strategic Steering Group
- Project Delivery Group
- Key Stakeholder Group

ESC will lead on the future development of this OBC with respect to the Tidal Barrier. SCC will continue provide support and resource for the delivery of the pluvial fluvial preferred option. Table 1.6 provides an overview of key project milestones.

Table 1.6 Key project milestones for Master programme with an unconstrained delivery approach (Actuals in Bold)

Activity	Date (DD/MM/YY)	Comment
SOC recommended for approved	04/05/17	By LPRG and submitted to ESC & SCC cabinets for information
Approval to proceed to OBC & TWAO	06/06/17	By ESC Cabinet
Tidal walls planning application submitted	10/07/19	By ESC to ESC Planning department
2018 OBC recommended for technical approval (tidal)	11/01/19	By LPRG followed by ESC cabinets
Tidal walls planning application granted	06/05/20	By ESC Planning department
TWAO - Issue draft Order to DEFRA	09/05/23	By ESC to DEFRA
TWAO - Order made	07/06/24	Assumes written representations only

Activity	Date (DD/MM/YY)	Comment
Tidal works		
Tidal walls work to start on site	08/04/21	Tidal wall construction commences in advance of tidal barrier, subject to planning permission
Tidal walls work substantially completed by	11/07/23	Excluding barrier tie in works
Tidal barrier work to start on site	01/07/24	Subject to TWAO
Tidal barrier work completed	31/03/27	Assumes 40m barrier –unconstrained construction approach

Benefits realisation

Tidal flood risk benefits are planned for realisation in 2028 when the tidal barrier works are completed, this will include 226 OM2's.

Pluvial fluvial benefits were realised in 2021, with 120 of the planned 264 OM2's delivered for PLR measures due to a lower than anticipated uptake from property owners and 7 OM2's for the fluvial wall works.

Risk management

The key risks associated with delivery of the project objectives and the mitigation measures being applied to manage these risks are summarised in Table 1.7.

Table 1.7 Key project risks

	Key Risks	Risk VH/H/M /L/VL	Owner	Mitigation	Risk Post mitigation VH/H/M/L/ VL
1	TWAO application / Legal agreements – Objections to the TWAO / contents of required legal agreements may delay the tidal barrier.	H	ESC	Extensive consultation with impacted parties is being and will continue to be undertaken prior to submission of the applications and during the development of legal agreements.	M
2	Unforeseen ground conditions – Extensive GI has been completed to inform the design and construction of the tidal flood walls with initial GI undertaken for the tidal barrier.	H	ESC	Further GI at barrier location will be undertaken to confirm design assumptions, risk allowance is included for a level of risk relating to ground conditions.	M
3	Funding – high level of additional partnership funding required to progress Stage 2 of project (tidal barrier).	VH	ESC	Funding programme in place – plan in place to source additional funding and provide regular formal updates to funders and stakeholders. Staged approach to delivery, risk of not completing second stage of tidal project	H
4	Inability to agree land access with key stakeholders	M	ESC	Include requirements as part of early consultation / development of legal agreements. Progress heads of terms and continue with TWAO development.	L
5	Delays in discharging TWAO consent conditions	L	ESC	Ensure conditions are included in programme and scope of works. Early liaison with stakeholders to reduce the risk of unknown conditions.	VL
6	Inflation – current levels of inflation result in increased delivery costs.	VH	ESC	Monitor inflationary pressures – work with supply chain to deliver efficiency. Include an allowance for a reasonable level of inflation as risk. Consider recommendations of Environment Agency guidance on managing cost uncertainty.	H

Quantitative risk registers have been developed by the project team including the Early Supplier Engagement Contractor and applied with residual optimism bias allowances

to inform the risk budget for the preferred options in line with current DEFRA/EA risk management guidance.

Assurance, approval and post project evaluation

Assurance of this OBC will be undertaken through the EA's Large Project Review Group (LPRG) following review and recommendation of the Project Board to proceed with document submission. Following a recommendation by LPRG to approve the OBC it will be submitted to the ESC cabinet for information.

A further OBC submission will be made to LPRG in relation to the Stage 2 tidal barrier element of the LFRMP for further assurance once full funding has been secured.

Post project assurance will be undertaken in line with the requirements of ESC and any additional requirements associated with the project funding sources.

1.8. Recommendation

It is recommended that this 2022 update to the OBC is given technical approval as the basis for delivery of Stage Two of the tidal elements of the Lowestoft FRMP incorporating the tidal flood walls and Local Choice tidal barrier elements. As there is a funding gap its recognised that the OBC will need to be resubmitted for financial assurance when the required funding has been secured. In the interim, this means that technically no funding related to the walls or barrier can be drawn down beyond studies related to the OBC. Guidance from LPRG is requested on these matters.

It is ESC's intention to claim FCERM-GIA funding towards costs incurred in developing studies relating to this and future updates of the OBC document as detailed in the recently submitted FCERM2 form and supporting BCUR document.

A further update to this OBC will be submitted for financial approval on securing the required funding to deliver the tidal Stage Two works with the aim of securing and releasing the FCERM-GIA funding attributed to both the Stage One and Stage Two tidal works.

The total estimated sum for approval for the overall 2022 OBC is £171.9m (cash cost), which includes a risk contingency of £54.7m and £10.9m inflation allowance over the anticipated construction period. The OBC Stage Two anticipated FCERM-GiA funding is £9.5m towards the tidal works. The costs for approval are based upon the local choices option with seasonally constrained delivery, the GIA funding allocation is based upon the nationally economically preferred option.

2. The strategic case

2.1. Introduction

This document is an OBC presenting the business case for the tidal flood defence elements of an integrated pluvial, fluvial and tidal flood scheme for the town of Lowestoft. This OBC is refreshing the information presented in the LFRMP OBC 2018 notably - the tidal defence and a 28m mitre gate barrier option which had technical approval from EA LPRG in 2018 but did not have financial approval at the time due to funding uncertainty.

This OBC will highlight progress made on the pluvial and fluvial aspects of the scheme which have now been delivered in Lowestoft. The OBC will demonstrate the progress made to date on the tidal wall delivery and set out the case for a new 'local choice' 40m mitre gate tidal barrier to complete the integrated flood risk plan set out in the previous OBC by East Suffolk Council in 2018.

The completed LFRMP scheme will reduce the risk of flooding to over 1085 families and 825 businesses for generations who are currently completely exposed to flooding from the sea, rivers and rain with no formal flood defence in place. The LFRMP will also significantly reduce the risk of flooding to key infrastructure including A roads, bridges, the rail network, water treatment, IT and energy assets.

The total project will enable 10,900 jobs and £499m of GVA per year to be resilient and support the generation of 3,500 additional direct jobs locally and 8,000 indirect and induced jobs nationally plus an additional £195m of GVA in the area per year.

This OBC will set out the costs and benefits of the 40m barrier option and demonstrate the unique challenges facing delivery of this solution in Lowestoft in relation to maintaining an operational port facility. The OBC will highlight the significant work that has already been done to engage key stakeholders to support the Transport and Works Act Order process along with the opportunity to accelerate the barrier project to align with wider economic opportunities with ABP ports and EDF energy, reducing construction, programme and costs.

This OBC shows that whilst we have a technically viable and cost beneficial 28m barrier solution we have needed to pursue a wider barrier option to maintain the operational port entrance to deliver wider stakeholder needs. This decision was agreed by the local ESC Members and wider LFRMP Project Board in October 2021 and shared with EA colleagues and some LPRG assurers in December 2021.

The cost of the 'local choice' option at £171M (with OB and Risk, excluding O&M) is comparable with similar recent barrier projects around the UK. However, in this case there is a greater cost certainty due to the stage we are at in barrier design at this point in OBC submission. The 'local choice' option is not cost beneficial under current Treasury rules. It is, however the only workable option that will deliver flood risk reduction to complete the integrated flood scheme for Lowestoft and is the also agreed in principle with the key landowner stakeholders, including ABP, allowing this project to progress at an accelerated rate from April 2024 for delivery in 2027.

The economic opportunities are set against the challenges of establishing Outcome Measures that meet Treasury Guidance for FDGIA despite the project contributing to national outcomes of six different Government departments and support the national objectives of levelling up deprived places, contributing to more resilient places, and supporting the green energy economy and carbon reduction targets by enabling offshore wind and nuclear delivery programmes.

This project has the full support of the Project Board, ESC Members and the local MP. The project has been fully discussed with EA Area, LPRG and National colleagues and the approach taken to date has been progressed with their full involvement and support.

The technical solution for Lowestoft is therefore to progress a 40m mitre gate barrier option under an accelerated programme as this is the only solution available from the long and short list that meets the needs of cross-government outcomes and supports the local community and business of Lowestoft. However, the funding required for this scheme is currently not available due to inflationary pressures impacting increased cost of suppliers, material and resources.

Location

Lowestoft is a major seaside town located on the north-east coast of Suffolk at the UK's most easterly point. Lowestoft has a population of approximately 57,000 residing in some 27,000 residential properties. (Lowestoft Town Profile, ESC 2014). Lowestoft is a town of multiple deprivation. Over 35% of the population are either unskilled, in casual work or unemployed¹ and over 25% of the population is over 65².

The town has become increasingly vulnerable to flooding from all sources for decades. Heavy rainfall events led to significant fluvial and pluvial flooding in 2015 and flooded 33 homes in the Aldwyck Way and Velda Close area of the town. Tidal flooding to 400 homes occurred in the East Coast surge of 1953 and this was replicated again in 2013 tidal surge when 158 residential and 233 commercial properties flooded in Lowestoft and Oulton Broad. Key transportation links such as the railway and A12 also flooded impacting on flood response, recovery and clean up. The town currently relies on a temporary barrier system which is deployed when flood forecasting triggers a surge warning. Defences were most recently deployed in 2017 when severe flood warnings were triggered and a 2.1m surge was predicted. Thankfully the surge diminished due to changing weather patterns. The town currently relies on the temporary barrier solution until a more permanent solution can be delivered.

Table 2.1 presents a summary of the sources of flooding, flood pathways, receptors and future climate change impacts directly considered in this OBC.

Table 2.1 Summary of existing (2018) flood risk

Source	Pathway	Receptors	Climate change impacts
Tidal – North Sea	East: Outer Harbour and into Lake Lothing. Flooding occurs when tide level overtops existing quaysides / through existing drainage network. West: Mutford lock via the Broads' system from Great Yarmouth	Existing residential and commercial properties. Future development areas. Local infrastructure including: roads (A12/A47 – Bascule Bridge), telecoms, electricity distribution, gas distribution, surface and foul water drainage systems.	Sea level rise will increase the impact and frequency of tidal flooding. Increased storminess will increase tidal surge events duration and intensity. .
Pluvial fluvial	Flash flooding from intense rainfall events. Capacity of existing drainage systems resulting in flooding where surface water cannot drain away or banks of drainage channels (including the Kirkley Stream) are overtopped.	Existing residential and commercial properties. Future development areas. Local infrastructure including: roads, telecoms, electricity distribution, surface and foul water drainage systems.	Increased frequency and duration of high intensity rainfall events.

¹ Office of National Statistics (ONS) 2021 Census

² Age group breakdown estimates - Lowestoft 2016, Suffolk Observatory – ONS data.

Lowestoft is particularly susceptible to flooding from tidal surges due to the small normal tidal range compared to other locations along the east coast of England. Lowestoft has a tidal range of approximately 2m. This is low when compared to locations along the outer Thames and Humber estuaries which have tidal ranges in excess of 5m. A consequence of this low tidal range is that a significant tidal surge (<2m) at Lowestoft could cause flooding at almost any state of the tide whereas at locations with a greater tidal range where the timing of the surge event compared to high water has greater influence and reduces the likelihood and/or severity of flooding from the surge.

Lowestoft's open coastal frontage is well defended to the north and south and management of the defences is set out in the Gorleston to Lowestoft Strategy with Hold the Line policies identified in the recent Suffolk SMP Refresh (SMP7) and Catchment Flood management Plan (Appendix F10 and F24 respectively) being viable for the future management of Lowestoft and the coast. An overlap in benefits across the open coast frontage and within the central Lowestoft harbour area have been considered and outcome measures have been reasonably apportioned in line with current appraisal guidance and the approach set out in the Strategic Approach document (Appendix M).

The need

Due to historical developments around the inner harbour and fluctuations in the success of the port industry in the town over time – central Lowestoft has remained 'open' to the tide with no formal defences in place to manage tidal flood risk. Discussions with national EA colleagues and wider coastal local authority networks suggest Lowestoft is the only coastal town of its size in the UK to remain undefended to this increasing risk.

The town is uniquely placed to support the offshore wind energy sector and new businesses are moving into Lowestoft to grow operations and maintenance roles in the sector. The latest Government announcements for the new nuclear power station – Sizewell C- to be given the go-ahead means Lowestoft will also now support marine-based operations for the delivery of this new national infrastructure. New housing and businesses premises are needed to support this new 'east coast energy hub' and Homes England have also visited the town recently and want to support Government investment in the Harbour and Oulton Broad areas.

The lack of defences as detailed in the strategic approach documents (Appendix M) are evidenced as suppressing the ability of Lowestoft to develop and grow and are not allowing the deprived areas of the town to 'level up' as per wider Government outcomes. The lack of certainty about tidal flood risk is holding Lowestoft back and allowing social deprivation to remain a key issue for the town. As an example - women in the Harbour & Normanston Ward area of Lowestoft will live 10 years less than other women in the same demographic in the rest of East Suffolk³.

Due to the historical prevalence of the port at the heart of Lowestoft – the lack of development of residential and business properties in the port area means low property numbers and therefore low OM2 values. The significant OM1 values are not valued in the same way under Treasury guidance and therefore a flood defence scheme has never gained traction for the town.

To deal with these issues, East Suffolk Council submitted an Outline Business Case for an integrated flood management scheme for Lowestoft in 2018. The OBC outlined a number of measures to reduce pluvial and fluvial flood risk in the Kirkley area and south of the harbour using both physical defences, new pumping regime and property level protection solutions in partnership with Suffolk County Council and

³ Source: ONS, 2015-2019 data. Accessed via localhealth.org.uk – featured in Lowestoft Community Partnership Profile - 2022 update

Anglian Water. In addition, the OBC recommended a phased tidal wall and tidal barrier project to give the town integrated flood risk resilience to 0.5% AEP.

The OBC was given technical approval and financial approval was granted for fluvial and pluvial works to progress due to the availability of partnership funding from Suffolk County Council and the Anglian Local Enterprise Partnership with Anglian Water. However, as further work on the design of a 28 m tidal barrier and adjoining tidal walls was needed the tidal works were only given technical assurance whilst funds were found.

As well as the FCERM benefits, the provision of tidal defences and improvements to the management of the pluvial and fluvial flood risk infrastructure will increase business confidence for investment in Lowestoft which is critical. An allocation of £10M NALEP funding has already been made to the LFRMP scheme and further discussions with the NALEP are in train. In addition, local businesses that would benefit from the proposed works have also made commitments to provide both benefits and funding 'in kind' towards the project. Project funding sources are discussed further in Section 5.2.

ESC through the Scape framework contracted Balfour Beatty to lead the design and build of the integrated defence scheme with Jacobs as designers. The project team successfully delivered the pluvial and fluvial elements of the project in 2021/22. We are also using the National Themes and Outcome Measures tool to ensure the project is delivering important local legacy and social value outcomes that directly benefit local people and place.

Construction of tidal wall works have commenced along Hamilton Road (completed 2022) and Waveney Road (still in progress) with funding that was not contingent on the financial approval of the 2018 OBC. The second submission of this 2022 OBC is aimed at securing the technical approval for the revised options and the refreshed appraisal.

This 2022 OBC sets out an updated business case for the investment required and reviews the strategic context of the tidal options, including a review of earlier long and short list options to ensure the barrier is solution is still the right solution. This OBC has been developed using the guidance set out in the FCERM-AG (Environment Agency 2021) and Treasury Green Book Guidance (HMT, 2020 with 2021 amendments). Due the fact that the scheme is already well underway making it different to a standard OBC, extensive consultation has taken place between the ESC and EA at both Area and National levels to inform this OBC and the development of the overall project.

Impacts on the local economy

The impact of tidal flooding on the local economy is significant. A port like Lowestoft can only exist in a coastal location arguably in a flood risk zone. The port is one of only a few east coast ports that are in a position geographically to support offshore wind energy development and contribute to our national economy and wider government outcomes for greener energy supplies and carbon neutrality. The damage and disruption that caused by flooding- like the 2013 surge -coupled with the lack of confidence for investors in the town that flood risk brings is stymying local growth. This in turn affects the local population due to reduced employment opportunities and diminishes the services available to them as taxable returns to ESC to offer such services are also limited. Whilst these impacts do not contribute to the amount of FCERM-GIA that is available to the LFRMP, it is a key measure for the NALEP business case who recognise the value of these benefits.

The lack of certainty on flood risk is preventing development opportunities at key sites in and around the Lake Lothing area of the town making land uneconomic for private development which is needed to stimulate growth and provide much needed housing for local people. Homes for England have recently visited Lowestoft and are keen to work with us on delivering improved housing offers in Lowestoft to meet local need and deliver their housing requirements nationally. This housing will also fuel the economic regeneration of large parts at the centre of the town. Whilst some of this housing will be in the floodplain it is inevitable that development in seaside towns at risk of flooding is needed if coastal seaside towns are to remain viable. This is clearly set out in the Government 'Regeneration of Seaside Towns report'⁴ which acknowledges that without resilient coastal defences we cannot have resilient places.

The UK relies on a number of key coastal towns for nationally important economic outcomes as gateways to the marine and offshore industries and arguably we cannot meet the needs of the offshore and marine industries without coastal towns – arguably all are at risk of coastal flooding due to their proximity to the coast- we therefore require them to become more resilient and the LFRMP project aims to do that for Lowestoft. Without this scheme the only alternative is to manage flood risk though the existing temporary barriers until such time they are overwhelmed. Our only other option is to not proceed with a barrier project and ESC is not prepared to effectively 'decommission' Lowestoft as a town, nor is there any precedent to do so given the size and scale of the place and the opportunities it presents to local and national outcomes.

The Lowestoft Flood Risk: Economic Footprint and Impact Report⁵ (Appendix F3) assessed the potential impact of flood risk on Lowestoft's current and future economic footprint. The study concluded that for a tidal event with a 1in200yr return period (0.5% AEP which is similar to the 2013 surge event) 30% of Lowestoft's existing Gross Value Added (GVA) is at risk of flooding and this rises to 62% with climate change if it remains undefended. This is discussed further in Section 3. Including the notional FDGiA allocation, the project has secured commitments for £69,266.893 of funding to date. £62,176,439 is from partnership funding sources and includes;

- £10M from NALEP Growth deal
- £43,486,000 from HMG Green Recovery Fund

The GRF contribution was the largest capital allocation made nationally from the fund. Both allocations highlight the significant role the LFRMP has to play in supporting and enabling economic growth locally and nationally.

As evidenced in Appendix N1, a comprehensive funding strategy has been developed but a fully resourced plan is no longer in place due to the need for the 'Local Choice' barrier option and the rising inflationary cost of materials, supplies and resources that has happened globally in the last 2 years.

As the majority of the partnership funding requirement has related to the cost of delivering the tidal barrier while enabling the port to remain fully operational – the focus of our funding strategy now is to secure funds from other national sources by demonstrating the value of the scheme to at least 6 Government departments and their national outcomes. We are still approaching local sources based on commercial development enabled by the project including contributions from infrastructure providers due to the significant reduction in risk to their assets and customers. In the last 6 months we have worked very closely with Homes England, DHLUC and BEIS

⁴ Select Committee on Regenerating Seaside Towns and Communities - The future of seaside towns: <https://publications.parliament.uk/pa/ld201719/ldselect/ldseaside/320/32002.htm>

⁵ Lowestoft Flood Risk: Economic Footprint and Impact Report, MML, May 2022.

and sought cross-government support through political discussions via our MP and EA Area team involvement with government officials. Working with ABP's LEEF (Lowestoft Eastern Energy Facility) project team we have developed a unique programme opportunity to support their outer harbour expansion to allow greater green energy growth with wind and marine sector and meet the marine transportation needs of the national nuclear infrastructure project at Sizewell C to remove road transport pressures and reduce carbon through that route (in line with Government national policy).

The port is therefore poised for a significant economic shift and ABP have granted us full access to the navigational channel for 2 years if we can accelerate the LFRMP barrier project to commence in April 2024. Further cost reductions will likely be made as a result of this unconstrained access to the channel to build the barrier infrastructure both through the reduced programme timing and oncosts as well as the opportunity to buy materials earlier. This opportunity is time limited as the LEEF project will progress from 2024 regardless of the LFRMP.

The fast moving nature of this opportunity to build the barrier and support the LEEF project and EDF in the delivery of SZC is therefore presenting the LFRMP project team with a unique opportunity to reduce flood risk to the town earlier and make cost savings however we cannot commit to this accelerated programme fully without closing the funding gap of £113M and in parallel having greater national agencies support in parallel from national Government departments to maximise funding opportunities that may arise from the wider infrastructure delivery.

ESC has already committed £1M contribution and significant resource to the project and is also under-writing circa £50M to insure the schemes delivery with Government Actuaries Department and Treasury. The ESC under-writing is because Coastal Protection Authorities are not underwritten for capital schemes in the same way as Environment Agency. It is ESC's intention to fund the operation and maintenance costs for the tidal barrier and tidal walls. In line with ESC's procedures a commitment of this level requires approval from by the Full Council. An update on expected O&M costs is being included in project briefing paper that will be presented to the Full Council on the 23rd November 2023. At an appropriate time, ESC will be taking the substantial operation and maintenance costs to Full Council to secure the required approval for the funding required for post construction expenditure.

2.2. Business strategies

In setting out the strategic approach (Lowestoft FRMP Strategic Approach, Appendix M) for the management of flood risk in Lowestoft the SOC drew on a number of existing plans and strategies to make an assessment of any overlap or conflict with the LFRMP. Where an overlap between the benefits areas was identified, a fair split of benefits has been proposed to ensure that the double counting of benefits/outcomes does not take place. A review of this assessment was undertaken as part of this OBC which concluded that this remained a valid approach.

The following plans and strategies were considered:

- Lowestoft Transport Infrastructure Prospectus (ESC, 2013)
- Broadland Rivers Catchment Flood Management Plan (CFMP, 2009)
- Anglian River Basin Flood Risk Management Plan (EA, 2015)
- Gorleston to Lowestoft Coastal Strategy (ESC/ Great Yarmouth Borough Council (GYBC), 2017)
- Kelling Hard to Lowestoft Ness Shoreline Management Plan (SMP) (adopted 2012)

- Suffolk SMP2 Sub-cell 3c (2010)
- A Flood Management High Level Review for the Broads Climate Partnership (Broads Authority, 2016)
- Lowestoft FRMP SOC (ESC, 2017)
- Lowestoft Fluvial / Pluvial Options Report
- Environment Agency's Norfolk, Suffolk and Essex Coastal Modelling Study ,2018 (Draft outputs)*

*These draft outputs were used to inform the hydraulic modelling used to inform the economic analysis. Whilst this analysis has not been updated for the 2022 OBC, a sensitivity assessment completed was completed using the latest Coastal flood Boundary data set which is further discussed in Section 3.9 and Appendix E1.

This LFRMP and the G2LS consider an area with potentially shared benefits. This overlap has been considered in the Economic Case to ensure that an appropriate split of benefits/OMs is applied to any projects that result from either strategy and that double counting of benefits is avoided. This is considered in detail and recommendations are made in the Lowestoft FRMP Strategic Approach document, Appendix M1.

SCC's proposals for a third road crossing of Lake Lothing have also been considered in terms interactions with flood risk management options and the potential for a combined bridge and flood risk management structure.

The provision of new flood risk management measures forms an integral part of the Lowestoft Infrastructure Prospectus (Appendix F4) which establishes ESC's framework of infrastructure improvements to enable economic growth in Lowestoft.

2.3. Environmental and other considerations

The development of options considered several environmental issues, regulatory requirements, legal and other obligations to be considered and addressed as options are taken forward. The key areas for consideration are as detailed below:

- Transport and Works Act Order (TWAO) – Barrier works within Harbour
- Environmental Permitting Regulations
- Marine Licence requirements
- Planning permission
- Heritage requirements
- Legal agreements – Landowners, tenants, highways and Port Authority
- Other highways agreements
- Environmental impact of options/EIA regulations
- Water Framework Directive
- Utilities diversions/wayleaves
- Habitats Regulations Assessment

Building upon the Strategic Environmental Assessment Environmental report⁶ (included in the PEIR Appendix H1) presented at SOC stage, the following environmental reports have been produced at OBC stage considering the preferred options:

⁶ Lowestoft FRMS - SEA Environmental Report Preferred options, CH2M 2017

- Preliminary Environmental Information Report ⁷
- Habitats Regulation Assessment ⁸
- Water Framework Directive Assessment⁹

The findings of the environmental assessments and associated consultation have been fully incorporated into the evaluation of options as presented in Sections 3 and 4 (tidal and pluvial fluvial economic cases respectively), with the environmental reports produced included in Appendix H1 to H5.

As development of the 40m tidal barrier option (local choice option) continues further environmental studies (EIA) are being undertaken to inform the development of this option and support the TWAO process. These studies are under development and will not be included in this OBC document. Section 3.4 of this OBC has been reviewed to take into account the current understanding of environmental impacts of both the 28m and 40m barrier options.

2.4. Investment objectives

The Lowestoft FRMP investment objectives were initially defined in the SOC and have been reviewed at OBC stage and remain broadly unchanged as presented below:

- To reduce the risk to residential and commercial properties from the combined effects of tidal and pluvial fluvial flooding.
- To reduce costs associated with developing and insuring property within areas of Lowestoft susceptible to flooding.
- Identify the most economically advantageous option in relation to the allocation of funding through FCERM-GiA.
- Provide a minimum standard of protection of 1 in 200 (0.5%) AEP against tidal flooding to residential and commercial areas of Lowestoft, to enable the release of growth funding from the NALEP and other forms of partnership funding.
- Provide businesses with the confidence to grow and invest in areas of the town which are currently not considered suitable for development (planning) due to the risk of tidal flooding.
- Target construction completion of the tidal walls in 2023 and the tidal barrier in 2031 (Local choice 40m barrier option – seasonally constrained delivery).
- The objective for implementation of the pluvial fluvial works was met in 2021.
- Clearly set out the approach to OM and benefits sharing between the sources of flooding (tidal, pluvial, and fluvial) and coastal erosion.

The NALEP business case which is included in Appendix F identified the following additional key project outputs:

- Supporting 10,900 direct jobs and supporting the generation of 3,500 additional direct jobs in the project area.
- Securing GVA for the local economy
- Supporting the future generation of additional GVA within the area.

⁷ Lowestoft FRMS – PEIR, CH2M 2018

⁸ Lowestoft FRMS – Habitat Regulations Assessment, CH2M 2018

⁹ Lowestoft FRMS – Water Framework Directive assessment, CH2M 2018

- Enabling the development of key sites through the alleviation of direct flooding and protection of essential infrastructure.

2.5. Current arrangements

Recent flood events highlighted the need for investment in flood risk management in Lowestoft. They also resulted in significant changes in the approach to managing the current level of risk from flooding (tidal, pluvial and fluvial). The following sections summarise the current situation.

Flood risk management structures

Currently Lowestoft has no completed formal tidal defences. Construction of tidal walls along Hamilton Road (which are common to all tidal options) is currently in progress and is forecast to be fully operational in 2023. An informal tidal defence is also provided in part by the foundation of a security wall along part of the port boundary with the A47. Construction of the remaining tidal walls around the perimeter of the outer harbour are forecast to be completed in 2023.

There are numerous drainage outfalls into Lake Lothing from the private and public drainage network (surface water and foul). The outfalls range in type from directly connected surface water gullies to combined sewer storm overflows. Where outfalls do not have a flap/non-return valve fitted to them, they provide a pathway for tidal flooding of infrastructure and properties. Where flap/non-return valves have been installed, they can only be considered effective if a regular inspection and maintenance regime exists to ensure they function as intended.

Whilst responsibility for these outfalls may lie with private companies and individuals, their impact on the effectiveness of the proposed tidal defence options could be significant and must be managed. Anglian Water has undertaken works (investment of approximately £2.3m) to address flood risk issues associated with their combined sewer and surface water drainage systems which contribute to the overall flood risk in Lowestoft. Further details of these works can be found in the strategic approach document in Appendix M1.

Flood warning

The EA's flood warning system provides forecasts and warnings to relevant authorities and to the general public enabling action to be taken in response to a forecast event.

Local media channels including radio, television, social media and internet news sites are also used to share flood warnings and provide advice/instruction in terms of what action should be taken.

Response to flood warning

When tidal flooding is forecast the response is managed through the multi-agency Suffolk Resilience Forum which includes representation from County and District Councils, Fire Service, Police, Highways England and the EA. The forum is provided with early indications of forecast extents to enable planning to take place prior to the higher confidence warnings issued to the general public.

For a significant tidal flood event affecting Lowestoft such as that experienced in December 2013, resources to respond to the incident need to be pre-positioned in advance of the event to ensure they are in place before transportation routes are affected¹⁰.

The Bascule Bridge (twin span lifting bridge) carries the A47 (trunk road) and is a key transportation route for Lowestoft and the wider region. The bridge remains down during a tidal surge event with any lifting operations suspended prior to the abutment

¹⁰ Lowestoft temporary defences Workshop June 2016 – general discussion point

chambers being flooded. Should the abutment chambers be flooded, the bridge would not be operable until they had been pumped out and the mechanical and electrical equipment used to operate the bridge dried, inspected and repaired as necessary. Any period when the bridge cannot operate has a direct impact on navigation between the inner and outer harbours and can have a significant impact on businesses within the inner harbour that are reliant on access to the North Sea. With regard to highway safety the A47 will remain open for as long as it is safe to do so as assessed by Highways England. However, during a tidal surge event it is more likely that the roads leading up to the Bascule Bridge would become impassable before the bridge deck itself is overwhelmed.

Temporary tidal defences

As an interim measure to reduce the risk/impact of tidal flooding the Regional Flood and Coastal Committee has funded the purchase of approximately 1.4km of temporary defences with the aim of reducing the impact of tidal flooding to key areas of Lowestoft. This investment has been funded through Local Levy with the temporary defence assets to be released to the EA for use elsewhere once a permanent solution is in place for Lowestoft. The temporary defences were purchased in late 2016.

The temporary defences were deployed in response to the forecasting of a significant tidal surge on 13 January 2017. Fortunately, the surge was not as severe as forecast and the water level did not reach the temporary defences. The water level was however very close to the toe of the temporary defences and their presence provided reassurance to project partners and the local community that active steps were being taken to manage tidal flood risk. Photographs of the January 2017 temporary defences deployment are contained within Appendix C2.

As part of the temporary tidal defence system and following the 2013 tidal surge, works have been undertaken to the surface and foul water drainage system to reduce the flood risk from the ingress of tidal water. These works undoubtedly reduced the inflow of tidal water into the drainage system and are likely to have reduced flooding via this route in January 2017.

Whilst the temporary defences provide a level of flood risk reduction they should not be considered as a long-term solution for the management of tidal flood risk in Lowestoft as they cannot provide the required standard or certainty of protection required to achieve the project objectives. Consideration is being given to how to adjust the deployment of temporary defences to account for the new tidal walls once they are complete. This is further discussed in Section 3.3 where temporary defences are considered in the long list of tidal options.

2.6. Pluvial fluvial flood risk

Pluvial Flood risk

Lowestoft is at risk of flooding from pluvial and fluvial flood sources. These risks are now managed through the work – as set out in the 2018 OBC for LFRMP- that was delivered by the project team and finalised in 2021. This has led to 127 homes being better protected against pluvial and fluvial flooding.

2.7. Main benefits

The proposed investments aim to provide the following strategic and operational benefits to Lowestoft:

- Provide a 1 in 200 (0.5%) AEP standard of protection against direct tidal flooding to residential and commercial areas of Lowestoft where economically justified by FCERM-GiA and NALEP funding considerations.

- Reduce the risk from tidal, pluvial and fluvial flooding to residential properties and businesses; contributing towards the FCERM six year investment programme targets.
- Reduce the current burden on emergency services and other organisations in responding to flood events in Lowestoft.
- Provide confidence to local businesses and encourage investment and growth in the local economy.
- Allow the development of brownfield sites within the Riverside Local Enterprise Zone and the Powerpark Local Development Order zone, not currently considered suitable for redevelopment due to the risk of tidal flooding in events with a probability of occurrence of less than 1 in 200 (0.5%) AEP.
- Reduce the impact of flooding on local roads and business infrastructure including the strategic A12 / A47 (including the Bascule Bridge), a key trunk road linking Norfolk and Suffolk and telecommunications infrastructure.
- Contribute to the objectives of the Lowestoft Transport Infrastructure Plan (Appendix F4) and the NALEP Strategic Economic Plan.
- Support the delivery of the LEEF project
- Support the reduction of land-based transport and subsequent pollution, carbon and disturbance levels through a marine-based transport hub the SZC development for a marine based hub in Lowestoft
- Contributes to the national outcomes of UK Government by delivering across 6 Gov departments including- Defra, BEIS, DHLUC, DFT, Homes England, Dept. Of Work and Pensions.

2.8. Main risks

A summary of key risks to achieving project objectives and mitigation measures are summarised in Table 2.2, pluvial fluvial risks have been removed from this table as these works have been completed.

Quantative risk registers for the preferred option represent the comprehensive project risk assessment for delivering the tidal works and are included in Appendix L.

Table 2.2. Summary of key risks and mitigation measures

Risk Theme	Description	Mitigation measure
Governance and communication	Differing objectives of partner organisations	Implement robust project management procedures and clearly defined responsibilities for partner organisations.
	Poor coordination of inputs from partner organisations.	
	Poor communication and consultation resulting in loss of confidence in the project.	Maintain a comprehensive communications' strategy to ensure continued engagement/ consultation with public, businesses, regulators, approvers, landowners and other stakeholders.
	Project acceleration opportunity	
Legal & Consents	Not securing Transport and Works Act Order (TWAO) and Marine Licence	Early engagement with key stakeholders, seeking to resolve any concerns in advance of TWAO and marine licence applications.
	TWAO programme - Missed opportunity to have unconstrained access to nav channel increasing project costs and lengthening programme and ongoing tidal flood risk to town	National discussions regarding the opportunity to use 'project speed' to accelerate the programme given the significant 'up front works' that have been done with stakeholders and agreements in principle with key landowners

Risk Theme	Description	Mitigation measure
	Not securing legal/access/other landowner agreements.	Early draft Head of Terms to be developed. Continued engagement with landowners and tenants.
	High costs for land purchase & compensation payments.	Develop options, construction methodologies and structure legal agreements with affected parties to minimise the impact of delivering options.
	Securing sufficient partnership funding.	Development of a comprehensive funding strategy and early, proactive, and continuous engagement with potential funders.
Funding	Insufficient risk allowance within the project costs.	Continuous assessment of risk throughout project development following robust risk management processes.
	Construction cost increases (change in scope, materials costs, ground conditions, delays).	Early engagement of specialists (contractors, consultant, barrier designers) to develop robust business case.
	Some planned elements of the project are not delivered impacting on the benefits realised	Tidal and pluvial fluvial elements are considered separately in economic terms. The approach to delivery ensures that FCERM-GiA expended delivers Outcome measures.
Design & Construction	Ground conditions along the defence alignment.	Early ground investigation undertaken to inform design development.
	Service diversions – cost and timing.	Appropriate levels of risk included in project costings. Working closely with utilities to develop options to accommodate existing services.

Strategic importance

The delivery of strategic flood risk management for Lowestoft is a high priority project for ESC and is a key element of delivering the Lowestoft Transport and Infrastructure Prospectus¹¹ which sets out the vision for enabling economic growth in the area through better infrastructure. The planned economic development of Lowestoft would be at risk if this element of infrastructure improvement was not delivered.

The risk of not delivering the preferred option outlined in this OBC needs to be considered in terms of the wider social and economic impact to Lowestoft including the LEEF project, renewables sector and areas identified as being essential to the delivery of other major energy projects of national significance. Whilst not a key driver for the FCERM-GiA funding allocation, a significant element of partnership funding (NALEP) is targeted at securing the future potential for social and economic growth. In addition not progressing the tidal flood risk management measures increases the risk to life for residents in Lowestoft.

As future predicted climate change takes hold in terms of sea level rise and increased storminess, Lowestoft will become increasingly susceptible to the impacts of tidal and pluvial fluvial flooding. As assessed in the Lowestoft Economic Footprint and Impact Report - May 22 (Appendix F3), the impact on the local economy will increase with climate change and limit the future economic growth of Lowestoft.

2.9. Constraints

A number of internally and externally driven constraints need to be considered in the further development of options; these are summarised in the sections below. This list has been refined following further detailed consultation undertaken for the OBC stage as discussed in Section 7.2 and documented in the LFRMP communication plan and engagement summary (Appendix G1). Constraints associated with funding mechanisms are discussed in detail in the Funding Programme Document (Appendix N1) with a summary included in Section 6.6 of this document. The constraints listed

¹¹ <http://www.eastsuffolk.gov.uk/business/regeneration-projects/lowestoft-transport-and-infrastructure-prospectus>

below relate to the delivery of the tidal element of the LFRMP only as the pluvial fluvial works have been completed:

- Availability of and any restrictions associated with partnership funding (NALEP, Local Levy, private sector)
- FCERM-GiA funding availability and requirements
- Environmental
- Geological
- Existing structures and infrastructure
- Port operations / future requirements
- Highways' assets (Bascule Bridge)
- RNLI and Coastguard
- Landowner/tenants' requirements
- Timing of works
- Construction impact on local businesses, community and other organisations

2.10. Dependencies

In order to deliver the project objectives, the following internal and external dependencies have been considered and are being actively managed by the project team (Tidal works only):

- Project approvals/assurance
 - ESC – internal approvals
 - EA – project assurance for FCERM-GiA allocation (LPRG)
- Funding arrangements – NALEP, Partnership, FCERM-GiA and Local Levy
- Legal agreements – Landowners, Port, Highways England, Royal Norfolk and Suffolk Yacht Club
- Licences, consents and orders
 - TWAO – Tidal Barrier
 - Marine Licences – dredging, permanent and temporary works
 - Planning permissions – Tidal flood walls
 - Environmental Permitting Regulations (EPR) consent (formally Flood Defence Consent)
 - Historic/listed building consent
 - Conservation area consent
- Existing coastal defences – considered in the G2LS

3. The tidal FRM economic case

3.1. Introduction

The tidal economic case summarises the approach taken to assess the options considered for the 2022 OBC. This has been further developed to account for:

- Feedback received on the 2018 OBC
- Better cost certainty
- The most recent partnership funding and appraisal guidance published in 2021&2022
- a change in the assessment of certain benefits
- Guidance provided by Environment Agency and LPRG [including the 'Dealing with Inflation' guidance note for RMAs.](#)
- Further detailed development and appraisal of the identified options as discussed below.

Key to ensuring an appropriate and proportionate split of benefits between tidal, coastal and pluvial fluvial flood risk is the Strategic Approach Document (Appendix M1) which considers the potential overlap in benefits areas and established the approach applied to avoid double counting of benefits. The Strategic Approach Document was developed at SOC stage and has been reviewed for this 2022 OBC, with assistance from Risk & Policy Analysts Ltd (RPA) in identification of benefits and damages. The document concluded:

- There remains minimal overlap between tidal and pluvial fluvial flood risk sources, with the probability of simultaneous occurrence considered very low.
- The assessment of overlap between the G2LS and the LFRMP remains valid for the coastal cell to the north of Hamilton Docks. [However as discussed below with the removal of the Hamilton Road works from this economic assessment means this is no longer of concern.](#)

In order to maintain a clear distinction between the pluvial fluvial and tidal flood risk management elements, the economic analysis of each is presented separately. This approach ensures clarity of the sources of benefits, the associated funding sources and different duration of benefits.

The economic appraisal and shortlisting of options has been undertaken in line with the requirements of the EA's FCERM-AG, with economic damage calculations undertaken based on guidance within the [Multi Coloured Handbook 2021 \(MCH\)](#).

[Following a review of the benefits provided by elements of the proposed tidal defences. It was identified that the Hamilton Road flood wall contributed relatively little to the FCERM Benefits through the coastal flood cell due to the reduced duration of benefits considered and no residential properties situated within the flood cell. This section of flood wall has now been substantially completed and was funded by the NALEP due to the reduction of flood risk afforded to the PowerPark Local Enterprise Zone. As such the costs and benefits/damages relating to this flood wall have been removed from this appraisal.](#)

[A navigation simulation was undertaken in early 2021 to simulate vessels transiting the proposed 28m tidal barrier. This simulation indicated that there was a risk of vessels making contact with the tidal barrier gates when in the open position which Multi Coloured Handbook 2021 \(MCH\) could increase the frequency of repairs required the gate structure. A thorough review of the location and sizing of the proposed barrier was undertaken involving key stakeholders to the project \(Appendix F20, Tidal Barrier – Technical review note\) This concluded that whilst the tidal barrier was located in the most suitable location and the type of barrier structure was also](#)

appropriate, it would be advantageous to increase the width of the barrier structure to 40m. This increased width reduces the risk of vessels making contact with the barrier improving its resilience. In addition, it provides greater flexibility for future changes to the Lake Lothing entrance channel. For this reason and as part of the design development and continued stakeholder engagement, a new 40m tidal barrier option has been introduced into the appraisal with the intention of selecting it as the preferred local choice option if it is not identified as the national economic option.

3.2. Critical success factors (Tidal)

The factors described in Table 3.1 have been used to assess the tidal flood defence options. These factors were developed for the 2018 OBC to consider delivery of the project objectives and the requirements of key partnership funding sources.

Table 3.1 Critical Success factors - Tidal

No	Critical Success Factor	Measurement Criteria	Importance (1-5)
1	Provide a minimum 1in200 year (0.5% AEP) SOP to comply with NALEP growth funding requirements.	SOP provided by option to areas driving NALEP funding allocation.	1
2	Provide the most economically justified SOP to other areas of Lowestoft – commercial and residential, safeguarding key transportation routes and infrastructure.	SOP provided by option to other areas at risk of flooding.	2
3	Provide a sustainable tidal flood defence system that is affordable.	Option cost with available funding in accordance with funding strategy, including whole life cost and O&M requirements	3
4	Not compromising the ability of existing businesses and infrastructure to operate and grow – Port, Industry, Railway, A47, and Bascule Bridge.	Impact of options on current operational regime of businesses and infrastructure.	4
5	Limit the impact of construction activity on the local economy and community.	Number and value of claims for compensation.	5

3.3. Long list options (Tidal)

The long list options considered for the management of tidal flood risk in Lowestoft are summarised in Table 3.2 including a brief description of why they were taken forward or rejected from the shortlisted options. The shortlisting process was undertaken with input from the Lowestoft FRMP technical steering group at SOC stage following an outline assessment of option cost and technical feasibility. This process was concluded with a workshop to agree the shortlist of options as identified in Table 3.3. A review of these options was undertaken for the 2022 OBC which concluded that the long list and shortlisting process remains valid. An additional tidal barrier option has been included for the 2018 OBC in the as discussed in Section 3.1.

All options involving the construction of a hard defence line required additional supporting works to be undertaken to outfalls from the local drainage systems to reduce the volume of tidal waters bypassing the defence line.

Table 3.2 – Tidal long list of options

Option	Description	Benefits delivered /Issues involved	Reason for shortlist or rejection
1	Do Nothing	No Benefits – reduced SoP when informal defence along A47 is not serviceable, climate change impacts are considered and increased damages when no flood warning service provided. Does not promote growth.	Shortlisted as baseline economic case

Option	Description	Benefits delivered /Issues involved	Reason for shortlist or rejection
2	Maintain - Do minimum	Some benefits – SoP reduces as climate change impacts, continued flood warning. Does not promote growth	Shortlisted as green book requirement.
3	Improve – flood walls only	Improves SoP to the majority of the strategy area – Mutford lock end still subject to flooding from the Broads' system in tidal surge event. Walls along inner harbour quays may restrict operational usage of some quaysides. Hydraulic modelling indicates some increase in flood risk to unprotected property at western end of Lake Lothing.	Shortlisted to test the feasibility of a non-barrier option.
4	Improve - Outer Harbour barriers and walls	Can provide the required standard of protection. Provides protection to the port area but also restrictions on the use of the port during a surge event.	Rejected due to: Significant cost of two large tidal barriers, significant improvement works to harbour arms, significant impact on ports operations during and post construction including losing its classification as a Safe Haven.
5	Improve – 28 metre Bascule Bridge barrier and walls	Improves SoP to the majority of the study area – Mutford lock end remains at risk of tidal flooding from the Broads' system. <i>Issues include: likely ship impacts (and associated costs and environmental effects of repairs) due to a narrower navigation channel compared to Option 9, as predicted by navigation simulations completed in 2021.</i>	Shortlisted. As a tidal barrier option seaward of the Bascule Bridge. Early indications from business and public consultation is that this option meets with public approval. <i>Identified in the 2018 OBC as the preferred option.</i>
6	Improve – third bridge crossing barrier and walls	Improve SoP to the majority of the strategy area – Mutford lock end remains at risk of tidal flooding from the Broads' system. Issues include: timing of project implementation, costs and navigation impacts.	Rejected. Third crossing is already being built. The 2018 OBC concluded that even with the potential efficiencies of the combined approach, the capital expenditure associated with such a wide barrier structure far exceeded that of the Bascule Bridge barrier and makes Option 6 unaffordable.
7	Temporary flood defences only	Improves SoP to limited areas of the strategy area. Will not enable growth nor significantly increase business confidence. Significant impact on business operations when deployed.	Rejected as a long-term solution due to: Low standard of protection (1in50 year (2% AEP) SoP in 2018) feasible, high long term operational costs, increased risk of failure or outflanking and lower levels of reliability when compared to permanent defences. Does not enable growth. Cannot readily keep up with climate change impacts and therefore cannot achieve the project objectives.
8	Property level resilience only	Limited benefits to individual properties where depth of flooding does not exceed 0.6m. Will not enable growth or significantly increase business confidence. Will not reduce the impact of flooding on transportation routes or other infrastructure.	Rejected as long-term solution due to: Depth of flooding means that for the majority of properties, this approach is not technically feasible, does not enable growth or protect infrastructure.
9	Improve – 40 metre Bascule Bridge barrier and walls	A new option with a wider barrier was introduced for the 2022 OBC to reduce risk of ship impacts and improved barrier reliability / availability. The costs and	Shortlisted. As a tidal barrier option seaward of the Bascule Bridge. Due to similarity with Option 5, this is considered to have similar levels of public approval. The increased

Option	Description	Benefits delivered /Issues involved	Reason for shortlist or rejection
		environmental effects of associated repairs would also be reduced compared to the 28m barrier in Option 5. Improves SoP to the majority of the study area – Mutford lock end remains at risk of tidal flooding from the Broads' system.	barrier width also contributes to greater resilience and is less restrictive on future development of the Lake Lothing entrance channel.

3.4. Shortlist options (Tidal)

Overview

The shortlisted options for reducing the risk of tidal flooding in Lowestoft are detailed in Table 3.3 with a summary description of each option. Plans illustrating the alignment of the shortlisted options are included in Appendix D2 as well as detailed design drawings for the outer harbour tidal walls in Appendix D3 and early design drawings for the 40m Tidal Barrier in Appendix D9.

From early feasibility studies it was identified that significant partnership contributions would be required to fund a tidal defence scheme for Lowestoft. The development of the shortlist of options therefore focused on options that would be able to attract the partnership funding required and achieve the project objectives. In particular the requirement for NALEP growth funding that the tidal defences provide a minimum of 1in200 year (0.5% AEP) SoP to enable commercial development and growth of areas protected by the proposed tidal defences.

All do something options taken forward for economic appraisal considered a range of SoPs to enable the determination of the most economically advantageous option as summarised in Section 3.5 with further detail in the Tidal Economic appraisal report (Appendix E1).

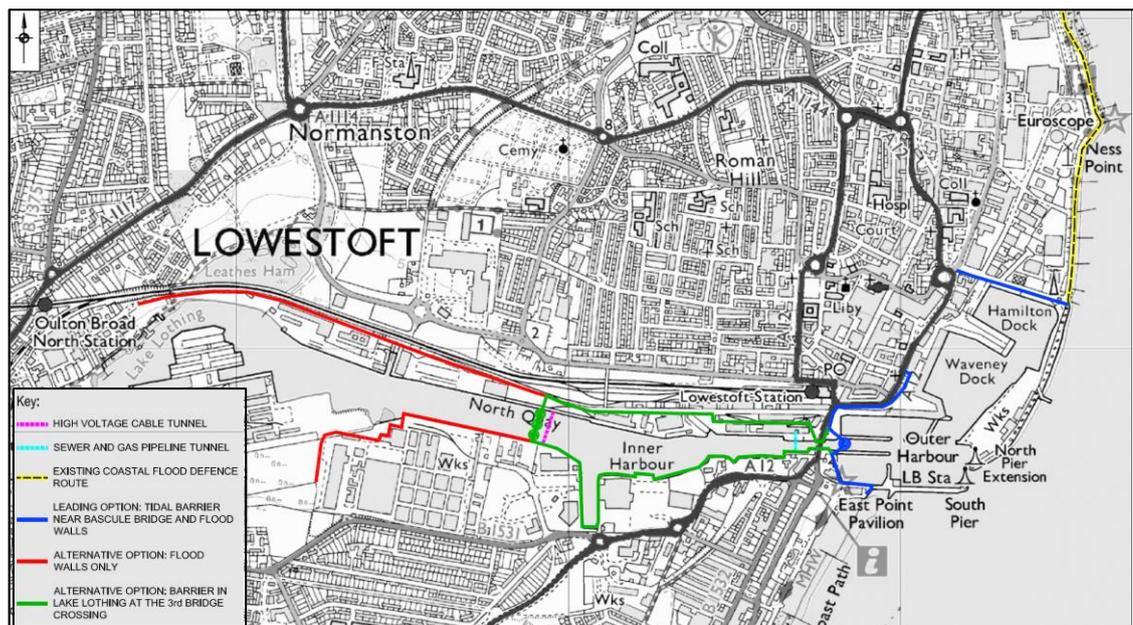
Table 3.3 – Tidal shortlist of options

Short listed Option	Option Description
1 Do nothing	No maintenance or improvements would be undertaken on the existing flood defences.
2 Maintain - Do minimum	Maintenance of the existing flood wall along the east side of the A12 Waveney Road would continue to provide an informal flood defence, preventing tidal flood waters up to a level of 2.90m AOD from reaching the town centre from the Outer Harbour. No new flood defences would be provided. Provision of the flood warnings would continue.
3 Improve – flood walls only	<p>Construction of approximately 5.5km of flood walls to the north and south of Lake Lothing and around the perimeter of the Outer Harbour. Where the defence line crosses the A47, lift-up/demountable flood barriers will be required from year 50. The Lake Lothing tidal walls tie into high ground towards the western end of Lake Lothing but do not continue all the way to Mutford lock. Continuing to the south in front of the Royal Norfolk & Suffolk Yacht Club, along the south pier access road tying into the existing Children's Corner sea wall. To the north of the Bascule Bridge, the tidal walls would be set back following the perimeter of the port estate, tying into high ground to the north of the main ABP port entrance. To accommodate an existing intermediate pressure gas pipeline, a section of demountable defences is required adjacent to the north west corner of the trawl dock, set to the east of the existing port security fence. A further wall with sections of demountable barriers providing access would be provided along Hamilton Road, tying into high ground in the west at the A47 and with the existing Hamilton sea wall to the east.</p> <p>A flood gate across the dual Norwich to Lowestoft railway line previously considered was ruled out due to technical and legal considerations.</p> <p>The tidal flood walls would be typically between 0.3m and 2.6m high including several sections of demountable defences, especially on the northern side of Lake Lothing to allow access to the port quaysides. A number of drainage outfalls would require adjustment to prevent the backflow of tidal water.</p>
5 Improve – 28m Bascule	Construction of a 28m wide (navigable width) tidal barrier across the Lake Lothing entrance channel on the seaward side of the A47 Bascule Bridge.

Short listed Option	Option Description
Bridge barrier and walls	<p>Approximately 1.0km of flood walls, flood gates and demountable barriers (0.3m to 1.9m high) would be constructed along the same alignment as Option 3 around the outer harbour with the flood walls tying into the tidal barrier structure, high ground and existing coastal defences to the north and south of the outer harbour.</p> <p>A number of tidal flap valves would also be required to seal existing drainage outfalls into the outer harbour. The existing tide gauge adjacent to the Bascule Bridge would need to be relocated to enable the construction of the tidal barrier.</p>
9 Improve – 40m Bascule Bridge barrier and walls	<p>This new option with a wider barrier was introduced for the 2022 OBC to improve barrier reliability by reducing the risk of ship impacts (and associated costs and environmental effects of repairs) when compared to the 28m barrier in Option 5. The increased width of the barrier improves the resilience of the barrier gates and reduces restrictions on the future development of the Lake Lothing entrance channel.</p> <p>The defence alignment of this option is the same as Option 5 except with a wider barrier and a shorter length of demountable defences.</p>

Figure 3.1 illustrates the relative alignments of the shortlisted tidal options. Alignment plans are included in Appendix D2 for each shortlisted option with detailed designs for the outer harbour walls which feature in all shortlisted options in Appendix D3. The tidal flood wall shown (blue line) to the north of Hamilton Dock is shown for completeness but does not form part of the works considered in the economic appraisal.

Figure 3.1 – Shortlisted options alignment plan



*The Lake Lothing Barrier option is no longer considered as a short list option following its removal in the 2018 OBC.

Technical assessment

Table 3.4 contains a summary of the technical assessment of options for the tidal flood defences. This table is supported by the Lowestoft Tidal Barrier feasibility study (Appendix F2) and the Tidal Options note (Appendix E3).

Table 3.4 – Technical description of tidal short listed options

Short listed Option	Option description and technical assessment
1 Do nothing	As Lowestoft does not benefit from any formal flood defences this option is not described further. The informal flood defence along the A47 forms part of the ports security fencing and is not maintained as a flood defence. It will therefore only provide a standard of defence for as long as it is in position. Should this structure deteriorate or be removed the standard of protection will be reduced accordingly.
2 Do minimum – maintain	Continued maintenance of the existing informal defence along the A47, no further improvements along the frontage. Existing standard of protection against tidal flooding will reduce as climate change impacts take hold in future years. Drainage system would become increasingly inundated by tidal waters at high tides that may result in flooding elsewhere if non-return devices have not been fitted.
3 Improve – flood walls only	<p>New flood walls would be constructed, tying into high ground. The walls will cross a number of existing wide vehicular and pedestrian access locations requiring demountable barriers to be installed. Some of the alignment adjacent to Lake Lothing is on top of the existing quayside. The suitability of the existing quayside to support the flood walls is a key area that would need addressing together with long term maintenance and replacement costs for the quaysides. Where flood walls do not follow the line of the quay they will typically follow existing land ownership boundaries.</p>  <p><i>Artist's impression of proposed flood walls adjacent to Station Square</i></p> <p>The existing Bascule Bridge presents a challenge. The configuration of the structure means that to secure flood protection above a level of 4.0mAOD and keep the bridge operational, cost prohibitive alterations to the structure would be required. The option considered is to tie flood walls into the abutments either side of the bridge. Install watertight doors to the abutment chambers and install lift up barriers across the carriageway on either side of the bridge. These demountable barriers would be required to be deployed when surge levels above 4.0mAOD were forecast and the A47 would need to be closed at this time.</p> <p>The key issues associated with this option include: service crossings, seepage under walls through existing quaysides, drainage system impacts, stability of existing quaysides, long-term maintenance of quaysides supporting flood walls, impact on port operations, impact on visual amenity, a tidal surge would still propagate through to the Broads' system at Mutford lock.</p> <p>Properties in the Oulton Broad and Mutford lock area would not benefit from any reduction in flood risk, hydraulic modelling suggests there would be an increase in residual flood risk. The use of property level protection would need to be considered for this community.</p>
5 Improve – 28m Bascule Bridge barrier and walls	<p>Option is the broadly the same as Option 3 for the flood walls located seaward of the Bascule Bridge. At the mouth of the channel the flood walls will tie into a tidal barrier structure. The barrier structure would prevent tidal surges from propagating into the inner harbour. With the barrier at this location the A47 would be able to remain open during surge events (up to the design event). The tidal barrier would reduce the impact of tidal flooding on the Broads' system. SOC stage hydraulic modelling indicated that localised ground raising would be required in Year 75 along South Quay to ensure the residual flood risk from the Broads did not overtop the banks of Lake Lothing. Revised hydraulic modelling at OBC stage indicated that these measures are not required, and the cost has therefore been removed from the economic analysis.</p>

Short listed Option	Option description and technical assessment
	<p>The tidal barrier needs to be a minimum of 28m wide to allow for future expansion of the inlet between the inner and outer harbour, with a barrier cill level that will not constrain the advertised dredge depth for the inner harbour. This option would involve demolition of a section of the southern pier that runs along the mouth of the entrance channel to Lake Lothing to accommodate the barrier structure.</p> <p>A feasibility study¹² identified that mitre gates were likely to be the most technically and economically viable option at this location, a thorough review was undertaken at OBC stage which confirmed this was still the case.</p> <p>Navigation simulations undertaken in 2021 confirmed that whilst navigation through the 28m barrier was possible, a risk of ship impacts with the barrier gates was highlighted. It is recognised that ship impacts with the existing quaysides do sometimes occur during navigation manoeuvres, particularly with the larger vessels that use the entrance channel when wind speeds are high. This would result in an increased frequency of repairs to the tidal barrier over its lifetime and in the worst case periods where the barrier is not able to operate. Mitigations for these events would include ABP placing temporary restrictions on the size of vessels allowed to transit the entrance channel when wind speeds exceed a certain threshold.</p>  <p><i>Artist's impression of proposed tidal barrier seaward of the Bascule Bridge in closed position</i></p> <p>Properties in the Mutford lock area will benefit from a reduction in tidal flood risk from the Lake Lothing side. However, tidal surges will still propagate through the Broads' system, entering via the mouth of the River Yare at Great Yarmouth. The economic analysis has identified three residential properties which remain at risk of tidal flooding to a depth of between 0.2m and 0.6m in 2117 (0.5% AEP 1in200yr event). Property Level Resilience measures may be appropriate to further reduce the risk of flooding to these properties in future years. There are other residential properties in the flood risk area which are located in elevated positions with the main dwelling area located above commercial properties. These properties are not eligible for PLR via GiA funding and do not count towards the outcome measure score. Commercial properties are also located within the Mutford lock area and further consideration of potential measures to improve their resilience to flooding should be given. The costs associated with any commercial property level resilience measures for the Mutford lock area have not been included in this appraisal as they would not attract funding from FCERM GiA or NALEP funding. Any future works to prevent a tidal surge entering the Broads' system at Great Yarmouth would help to alleviate this issue once the Lowestoft barrier is in place.</p> <p>In addition to the key issues identified for Option 3 those associated with the barrier include: Impact on navigation, closure timings, construction impacts, interaction with Bascule Bridge structure and resilience of structure to remain operational. Tidal surges can still propagate to Lowestoft (at reduced levels) via Oulton Broad through the Broads' system but revised OBC stage hydraulic modelling indicates the banks of Lake Lothing are not overtopped when considering a 1in200 year (0.5% AEP) tidal event in 2117.</p> <p>The length of demountable barriers, number of services crossings and number of outfalls to be treated would be significantly less than those for Options 3.</p>

Short listed Option	Option description and technical assessment
9 Improve - 40m Bascule Bridge barrier & walls	<p>This is a new option introduced for the 2022 OBC which has a tidal barrier at the same location as Option 5 near the Bascule Bridge but with a 12m wider barrier to reduce the risk of ship impacts (and associated costs and environmental effects of repairs) compared to Option 5, increasing the resilience and therefore reliability of the gates and further reducing restrictions place on the future development of the Lake Lothing entrance channel. As with Option 5, new tidal flood walls and flood gates would be constructed around the perimeter of the outer harbour, tying in to existing coastal defences to the north and south, and tying into the new barrier just downstream of the Bascule Bridge. This option would involve demolition of a section of the southern and northern piers that run along the mouth of the entrance channel to Lake Lothing and reconstruction of the pier 12m further north to accommodate the wider barrier.</p> <p>Due to a different construction approach, the 40m barrier allows the opportunity for unconstrained construction where works are no limited to relatively short seasonal possessions of the entrance channel. This could reduce the construction programme from 6 years to 3 years resulting in a significant construction cost saving.</p>

Environmental assessment

At SOC stage a detailed a SEA Environmental Report (annex to PEIR Appendix H1) was produced, assessing the potential environmental impacts, in combination effects and identifying enhancement opportunities for all shortlisted options. Strategic WFD and HRA assessments were also completed (Appendix H2 and H4 respectively). A Preliminary Environmental Information Report (Appendix H1) and revised WFD and HRA assessments have also been produced for the preferred option. Table 3.5 summarises the key environmental effects and opportunities for the revised shortlisted tidal options and has been refreshed for the preferred option (Option 5), highlighting any changes as a result of the more detailed assessment. **Please note: property numbers given in Table 3.5 are based on the assessment made at SOC stage and differ from OBC stage.**

Please note: the environmental appendices were produced based on assessment of a 28m barrier for shortlisted Option 5 to support the 2018 OBC and this section has not been updated to include the larger 40 m barrier size for Option 9. Given the location of the barrier is the same, it is determined that the effects would not be materially different to those stated in the appendices, although it is likely that the increased size of the barrier could affect the magnitude of some of the effects by, for example, making the barrier more visible and resulting in more dredged material requiring disposal. Conversely, the likely lower frequency of ship impacts for the larger barrier for Option 9 will result in a lower frequency of environmental effects of associated repairs (e.g. noise and disturbance of marine fauna).

Table 3.5 Key environmental effects and opportunities (tidal)

Option 1: Do nothing & Option 2: Do minimum – maintain	
Key positive effects	None identified
Key negative effects	<p>Under a do-minimum option, 128 (648 by 2115 including climate change) (SOC stage) residential properties will be at risk of flooding in 0.5% chance of flood occurring (i.e. a 1in200 year), of which 127 (544 by 2115 including climate change) (SOC stage) properties are located in the 20% Most Deprived Wards.</p> <p>Effects will be exacerbated for more vulnerable members of the population that will be less physically able to respond to a flood event or financially recover.</p> <p>All landfill sites will be at risk from a 0.5% chance of occurring (i.e. a 1in200 year) in 2115 (with climate change).</p> <p>The low level of protection the options will provide will result in increase in the risk of contaminates entering the waterbodies adversely affecting water quality and</p>

	<p>potentially deteriorating hydromorphology, ecological quality/quantity as well as substrate quantity/quality which could lead to homogeneity in habitat structure. Flood water percolation into the underlying ground waterbody could also increase risk of exposure to contaminants. For Option 1, the effect is likely to be exacerbated by the potential introduction of significant quantities of additional saline water into the Broads, through Oulton Broad as the Mutford lock will remain open under this option. This will severely affect the habitats and water quality (locally) but not for the wider Bure and Waveney and Yare and Lothing water bodies.</p>
Mitigation or enhancement opportunity	None identified
Option 3: Improve – flood walls only	
Key positive effects	<p>Minimises risk of flooding to most properties north and south of Lake Lothing, but will not reduce the risk for properties west of Lake Lothing.</p> <p>Option is likely to protect features within Lake Lothing Area Action Plan boundary.</p> <p>Likely to reduce flood risk to locally designated areas, which may result in positive benefits such as limited disturbance to the habitat of terrestrial flora and fauna of these sites, including reed beds, willow and intertidal mudflats.</p> <p>Flood risk at known landfill sites is likely to be reduced.</p> <p>Flood risk to conservation areas and the listed buildings likely to be reduced.</p>
Key negative effects	<p>Presence of defence walls is likely to affect physical and visual access to the river/coast from various locations along the proposed wall.</p> <p>Flood risk in Lake Lothing AAP proposed areas is likely to be reduced, however, during construction and future operation there is likely to be significant impact on port operations, therefore potentially affecting employment and commercial activities.</p> <p>Significant construction material resources will be consumed and construction is likely to generate waste.</p> <p>Option increases risk of contaminants entering the waterbodies adversely effecting water quality. Proposal could affect macroalgae through algae removal operations to facilitate construction and loss of invertebrates under the footprint of the new defences. Should piling construction be used for the defence structures, risk of saline intrusion into the underlying ground waterbody exists.</p>
Mitigation or enhancement opportunity	<p>Potential use of glass topped walls where required, adaptive approach where possible to limit the height and impact of flood walls initially where possible.</p> <p>Continue engagement with local businesses to assess and minimise the impact on business operations of proposed alignments and flood gate locations.</p>
Option 5: Improve – Bascule Bridge barrier and walls	
Key positive effects	<p>Only three residential properties (SOC stage) are likely to be at risk by comparison to 128 residential properties (SOC stage) that are at risk in a 0.5% chance of flood occurring (i.e.a 1in200 year).</p> <p>Option will reduce risk to the whole of the Lake Lothing AAP area, improving investor confidence therefore attracting inward investment.</p> <p>Option will help continue port activities during its operation phase. This will avoid the loss of revenue, working days and disruption resulting from flooding with positive benefits to the local economy.</p> <p>Flood risk to transport infrastructure will be reduced, such as the Lowestoft Station, the railway line and A12 / A47 road.</p> <p>Option reduces flood risk to locally designated sites for 1 in 200 probability of a flood event occurring in any one year up to year 2115 with climate change scenario which may result in positive benefits such as limited disturbance to the habitat of terrestrial flora and fauna of these sites.</p>
Key negative effects	<p>Short term construction impacts may affect port activities and must be mitigated with appropriate programme interventions.</p> <p>There are potential impacts (i.e. disturbance) to marine mammals resulting from construction activity.</p> <p>Construction activity could result in disruption to recreational users of the harbour and Lake Lothing, while in-harbour works are undertaken.</p>

	There are potential adverse noise and vibration effects that could result from piling and other construction activities, which could affect local residents in the surrounding areas.
Mitigation or enhancement opportunity	Further stage Environment Impact Assessment should identify appropriate mitigation measures to address the potential impact. Continue engagement with local businesses to assess and minimise the impact on business operations of proposed alignments and flood gate locations.

PEIR (2018)

A single PEIR (Appendix H1) has been prepared to consider all components (tidal, pluvial and fluvial flood measures) of the LFRMP the following text is summarised from its executive summary.

The PEIR identified that the LFRMP will provide significant benefits to Lowestoft by reducing flood risk to people, property and the environment and unlocking new opportunities for economic investment and regeneration. The development of the project has provided opportunities for the people of Lowestoft to engage with their town and environment, involving schools and local communities in developing aspects of the projects. It also presents specific opportunities to enhance views and landscape character along the banks of the harbour and around the port area.

The receptors and features that are likely to be affected by the construction or operation of the LFRMP have been identified. The key issues, risk and opportunities (i.e. whether potentially significant or uncertain) are identified in Table 1 of the PEIR (Appendix H1). These are considered in terms of the LFRMP as a whole and each component part. A precautionary approach has been taken to ensure a 'worst case' situation was considered and all reasonably foreseeable actions are identified, pending further discussions/agreement with the MMO, Defra and other statutory bodies/stakeholders. Other identified issues not considered to be potentially significant have been 'scoped out' from further assessment.

The PEIR also identified that the potential for cumulative or in-combination effects of the tidal barrier scheme with other plans and projects (e.g. the Lake Lothing Third Crossing), as well as with the other elements of the LFRMP need to be considered further, in particular during the EIA of the tidal barrier scheme.

Given the limited potential for impacts from the proposed property resilience measures, further consideration is not included within this PEIR and no formal environmental assessment is recommended.

The actions recommended to address the identified issues include:

- Consultation with affected statutory bodies, landowners and stakeholders to obtain additional data, discuss potential impacts and mitigation;
- Further surveys, to be agreed with the MMO/statutory bodies: e.g. in-channel habitat and invertebrate surveys, baseline noise surveys; bat roost assessment; sediment analysis;
- Baseline analyses: e.g. fish populations, hydrodynamics and processes, in-channel sediment sample data;
- Modelling, if agreed with the MMO/statutory bodies: e.g. two-dimensional hydrodynamic modelling, sediment plume modelling and groundwater flow modelling;
- Identification and development of appropriate mitigation measures – whether inbuilt within the project proposals or additional. Many of the identified issues can be addressed through good construction practices.
- A statutory EIA for all the scoped in issues relating to the tidal barrier scheme (as shown in Table 1).

Next steps

Subject to funding and technical approvals and pending further discussions/agreement with statutory bodies, the recommended further environmental assessments will be undertaken.

The EIA of the tidal barrier scheme and the [technical assessments needed to provide supporting information for the TWAO and other consents](#) have commenced with draft documents and assessments in development. These draft documents are not at a stage where that can be shared outside of the project team and are therefore not included in the appendices of this document.

The following points outline the key environmental deliverables currently being developed for the tidal barrier:

- [Environmental statement](#)
 - This develops the work that was done for the 2018 PEIR. There is no intention to update the 2018 PEIR.
 - A working draft of the environmental statement has been produced, and is being developed by the project team, it is not intended that this would be made 'public' until a more formal consultation stage (pre-TWAO submission).
- [Habitat Regulations Assessment](#)
 - A working draft of this has been produced. This includes an appropriate assessment for the scheme.
 - The intention is that the working draft would be discussed with Natural England. It would be released for formal consultation in line with the ES above.
- [Water Framework Directive](#)
 - A working draft has been produced, we would be looking to have discussions with stakeholders on this over the coming months, with a view to a more formal consultation in line with the ES above.

The design of various project components will continue to be developed in parallel with the environmental assessment processes. This iterative approach will enable potential adverse impacts to be avoided or reduced and opportunities for environmental improvements to be identified.

HRA Assessments (2018)

HRA assessments have been completed at both SOC and OBC stages. The SOC stage assessment (Appendix H2) considered all strategic options and concluded that all strategy options, either alone or in combination with other plans or projects, would have no likely significant effect on the European Sites and no further assessment is required under The Conservation of Habitats and Species Regulations 2010 (as amended). The HRA report (SOC stage) has been consulted upon with Natural England, who have confirmed that they agree with the above findings.

The OBC stage assessment (Appendix H3) considered the preferred options for each element of the LFRMP (tidal, pluvial and fluvial) and concluded that for most of the sites and their qualifying features there will either be no likelihood of any significant effects occurring or any effects would be trivial with respect to the site Conservation Objectives. This conclusion means that there is no requirement to assess potential in-combination likely significant effects with other plans and projects. However, a likely significant effect of the tidal barrier scheme, alone, has been identified on harbour porpoise, the only feature of the Southern North Sea SCI/cSAC. The information to inform the appropriate assessment has concluded that, with incorporated mitigation measures, it will be possible to avoid a conclusion of adverse effects on the integrity

of the Southern North Sea SCI/cSAC from the LFRMP alone. However, this needs to be corroborated by examination of the detailed noise and vibration levels that the works are likely to generate, once they are available. Likewise, the report has not been able to conclude the absence of in-combination effects at this stage because of the need for this level of information and in the absence of confirmed programmes for any of the in-combination projects (principally the Third River Crossing).

WFD assessments (2018)

WFD assessments have been completed at both SOC and OBC stages. The SOC stage assessment (Appendix H4) considered all strategic options and concluded that the proposed strategy was not predicted to cause deterioration in waterbody status or prevent the waterbody from meeting its objectives and therefore further assessment against the conditions listed in Article 4.7 is not required. Therefore, the Strategy is compliant with WFD, and no further assessment is required. Further stages of the Strategy should however re-evaluate the risk to the waterbodies when further engineering details become available.

The OBC stage WFD assessment (Appendix H5) considered the preferred option and concluded that the works associated with delivering the proposed tidal barrier requires further detailed assessment of the potential impacts on the transitional and coastal WFD waterbodies due to the extent and nature of the works. This will be completed and included as part of the ongoing environmental impact assessment as a Detailed WFD Assessment.

The effect of the tidal flood walls has been assessed and it is considered unlikely that there would be any significant effects due to the proposed walls. The works would be mainly set-back from the edge of the waterfront. Therefore, the tidal flood walls have been assessed as not likely to lead to the deterioration in the status of the Bure & Waveney and Yare & Lothing transitional WFD waterbody or the two downstream coastal WFD waterbodies. They would also not prevent the WFD waterbody from achieving Good status in the future. As a consequence, no further assessment is deemed necessary for this element of the Proposed Project and it is considered compliant with the WFD legislation. Table 3.6 summarises the assessment and identifies the waterbodies considered.

Table 3.6 Edited extract from WFD assessment (2018), Appendix H5 (Table 4.1: Scoping of project components for detailed assessment and Section 5)

Project component	Element	Scoped in or out?	Relevant WFD water body(s)
Tidal	Tidal barrier (construction and operation)	Scoped in – potential effect on transitional WFD waterbody as a consequence of the new concrete foundation structure and gate, including changes to flow and sediment processes during operation of the structure	Bure & Waveney and Yare & Lothing transitional WFD waterbody Suffolk & Norfolk East coastal WFD waterbody Broadland Rivers Chalk & Crag WFD groundwater
	Tidal flood walls (construction and operation)	Initially Scoped in as new flood walls along the edge of the transitional WFD water body. Scoped Out following further consideration as the proposed works are mainly set back from the waterbodies considered and located in existing port/harbour areas.	Bure & Waveney & Yare & Lothing transitional WFD waterbody Broadland Rivers Chalk & Crag WFD groundwater

3.5. Economic appraisal (Tidal)

The economic assessment of the shortlisted tidal defence options has been undertaken in line with the requirements of FCERM-AG. The Lowestoft tidal economic technical memorandum (Appendix E1) details the economic analysis undertaken in relation to the tidal element of this project. The economic analysis was

updated for the 2022 OBC to fully consider and determine the most economically advantageous standards of protection from an FCERM-GIA point of view. In the interests of cost efficiency the hydraulic modelling used to inform the economic analysis has not been updated for the 2022 OBC. Revised climate change and coastal flood boundary data have been published since the hydraulic modelling was completed in 2017. To consider if these updates have a material impact on the appraisal a sensitivity analysis has been undertaken with the findings summarised in Section 3.9.

The technical memorandum giving full details of the economic analysis methodology together with supporting calculation summary sheets are contained within Appendix E1, with a summary presented in the sections below.

It was identified early in the appraisal process that Option 9 was not cost beneficial in terms of the FDGIA economic analysis, it was therefore excluded from the economic analysis to identify the economically preferred option (national economic option).

Option Standard of Protection

Do something Options 3 and 5 were assessed to determine the most economically advantageous SoP. Further detail on this assessment and the associated option costing approach can be found in Appendix E1 and E2 respectively.

Benefits

Table 3.7 summarises the present value damages (PVd) and present value benefits (PVb) that can be attributed to each of the short listed tidal options together with the key qualitative benefits associated with each option. To take into account the potentially reduced in reliability and resilience of the 28m barrier option when compared to the 40m barrier or walls only option a 15 reduction in total benefits has been applied to the PV benefits used to assess the 28m barrier option. Further detail of this approach is included in the Economic technical report (appendix E1).

Table 3.7 – Tidal summary of option damages and benefits

Option	Damage (PVd) £k	Damage avoided £k	Benefits (PVb) £k**	Probability of 100% of benefits being realised	Adjusted Benefits (PVb) £k**	Key additional non-monetised benefits	
1	Do nothing	148,720				None	
2	Do minimum – maintain	148,720	0	0	1.00	0	None
3a	Improve – flood walls only - 1in20 year (5% AEP)	82,936	65,784	67,600	1.00	67,600	Minimises disruption to navigation through Inner Harbour entrance channel during construction.
3b	Improve – flood walls only - 1in75 year (1.33% AEP)	66,432	82,288	84,567	1.00	84,567	
3c	Improve – flood walls only - 1in200 year (0.5% AEP)	61,271	87,449	89,845	1.00	89,845	
3d	Improve – flood walls only - 1in500 year (0.2% AEP)	41,632	107,088	109,549	1.00	109,549	
5a	Improve – 28m Bascule Bridge barrier & walls- 1in75 year (1.33% AEP)	34,375	114,345	116,820	0.99	115,652	Enables Bascule Bridge and the A47 trunk road to remain operational during a tidal event. Enables rail links into Lowestoft to remain operational. Reduces impact of tidal flooding on Broads' system.
5b	Improve – 28m Bascule Bridge barrier & walls - 1in100 year (1% AEP)*	33,666	115,054	117,536	0.99	116,361	
5c	Improve – 28m Bascule Bridge barrier & walls - 1in200 year (0.5% AEP)	30,829	117,891	120,401	0.99	119,197	
5d	Improve – 28m Bascule Bridge barrier & walls - 1in500 year (0.2% AEP)	29,061	119,659	122,188	0.99	120,966	

Option	Damage (PVd) £k	Damage avoided £k	Benefits (PVb) £k**	Probability of 100% of benefits being realised	Adjusted Benefits (PVb) £k**	Key additional non-monetised benefits
9 Improve – 40m Bascule Bridge barrier & walls - 1in200 year (0.5% AEP)	30,829	117,891	120,401	1.00	120,401	As Option 5 with the addition of increased resilience and enabling future adaptation pathways for growth and economic development of Lowestoft.

*Interpolated values based on trend analysis.

**Including human health intangibles

The differing levels of PVd and PVb provided by options with the same stated relative SoP is due to the relative length of the flood walls over which tidal water would overtop in events exceeding the design level. In addition, the study area includes properties that do not receive or partially receive a reduction in flood risk from the do something options. These include commercial properties surrounding the outer and inner harbours and residential and commercial properties in the Mutford lock area.

Table 3.8 provides a summary of the key do nothing damage categories and the damages associated with each category, including potential damages associated with tourism were this to be included in the appraisal.

Table 3.8 PV damages – Do nothing damage categories and values.

Damage Category	PV Do Nothing Damages (100yr appraisal period) (£ million)
Residential Building, content and clean up (Direct)	19.7
Vehicle damages	1.9
Temporary and alternative accommodation	2.2
Non-Residential Building, content and clean up (Direct)	75.6
Non-Residential Indirect	2.1
Risk to life	9
Emergency response and recovery	23.2
Mental Health	6.3
Roads	5.7
Rail	0.5
Electrical substation - electricity loss	2.4
Sub Total	148.7
Tourism / Reputational Damage*	194

* Tourism benefits not included in economic analysis

Table excludes intangible health benefits (these are benefits, not damages)

Option costs

Base option cost

Costs for the shortlisted tidal options have been updated following detailed development of the new wider barrier option introduced since the 2018 OBC (Option 9 – 40m Bascule Bridge Barrier and Walls). The tidal flood wall element of Option 9 is complementary to all other 'Do Something' options and construction of these walls has progressed as a package of advanced works utilising funding that was secured and not linked to the financial approval of the 2018 OBC.

To inform detailed consultation with key stakeholders about the Option 9 (40m) tidal barrier in preparation for the development of a TWAO application and to develop greater level of cost certainty a staged approach to the detailed design underway. The 15% detailed design has been used to inform the options costing of this barrier presented in this economic analysis as well as its operation and maintenance requirements.

The SCAPE delivery contractor undertook detailed costing of Option 9 in December 2021, with the assistance of other specialist suppliers. Unit rates from these costing exercises were then used to update the previous costs for Option 3 and 5 which were originally developed for the 2018 OBC

Table 3.9 Costing and risk basis for shortlisted options

Option	Costing basis			Risk register	
	Outline design	Detailed costing	Benchmarked cost elements	Quantative & residual OB	Pro-rata
3 – Improve – flood walls only - 1in200 year (0.5% AEP)	Part	Part	Some	Part	Part
5 – Improve – 28m Bascule Bridge barrier & walls - 1in200 year (0.5% AEP)	Yes	Yes	None	Yes	None
9 – Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.5% AEP) Constrained and unconstrained delivery.	Yes	Yes	None	Yes	None

Detailed option costs were produced for delivering each shortlisted option to a 1in200 year (0.5% AEP) SoP in 2117. To assess the most economically advantageous SoP, a review of the defence alignments required to provide different SoP's was undertaken. This concluded that they remained unchanged from the 1in200 year (0.5% AEP) SoP due to the relatively flat topography and limited scope to tie the defences into high ground. Therefore, only the defence crest level would vary between the SoP's considered. To generate option costs for the alternative SoP's a percentage reduction or uplift was applied to the base option cost. Further detail is included in the option costing technical note (Appendix E2) which outlines the approach in more detail.

Adaptive approach

A managed adaptive approach has been applied to the delivery of the options at locations where it was considered advantageous to do so for both economic and environmental impact reasons. The managed adaptive approach has been applied in the following locations:

- Tidal flood walls along Waveney Road (all shortlisted options)
- Tidal flood walls along Lake Lothing (Option 3)
- The provision of demountable barriers and flood gates (all shortlisted options)

As part of the adaptive approach tidal flood walls would initially be constructed to the required crest level for 50 years' time, at or just before this point, they would be raised to provide the required SoP for the next 50 years. The foundations and groundwater cut-off of the wall would be suitable for the complete 100-year asset life.

For the demountable barriers and flood gates, these typically have a 50-year asset life and would be provided to the level required to provide the SoP for the life of the asset. As for the adaptive tidal flood wall sections, the foundations and groundwater cut-off will be constructed for a 100-year asset life. This approach will generate efficiency in the initial capital cost as well as the operation and maintenance costs of the assets. The only negative being where they are situated in a non-adaptive wall section, they will limit the overall SoP provided along that section. Further detail on the approach to costing the adaptive approach is included in the Tidal Options Costing Note (Appendix E2)

O&M costs

Following detailed development of the preferred options, there is greater certainty on the whole life O&M requirements. The Environment Agency's whole life costing workbook has been used as the basis of calculating the O&M costs for the options, supplemented by input from specialist suppliers with particular attention to the tidal

barrier structure. A schedule of anticipated operational and maintenance activities for the tidal barrier is provided in Appendix F18 which has been used to inform the whole life costing of the tidal barrier. Benchmarking has been undertaken to compare the anticipated O&M requirements and costs against similar barrier structures in addition to taking into account the specific requirements of the barrier structure proposed for Lowestoft.

Present values

Costs have all been discounted over the 100 year appraisal period (using the Treasury variable discount rate) to generate a Present Value Cost (PVC) for each option. The present value and cash costs for all options considered in the detailed economic analysis are given in Table 3.10a, a more detailed breakdown of key options PV whole life costs is given in Table 3.10b.

Table 3.10a - Summary of tidal options whole life PV & cash costs (£k)

Option	PV Cost including risk (50 th ile & residual OB) (£k)	Cash Cost including risk (50 th ile & residual OB) but excluding inflation (£k)
Option 1 - Do nothing	0	0
Option 2 - Do minimum – maintain	472	1,703
Option 3a - Improve – flood walls only 1in20 year (5% AEP) SoP	151,092	179,529
Option 3b - Improve – flood walls only 1in75 year (1.33% AEP) SoP	151,752	180,213
Option 3c - Improve – flood walls only 1in200 year (0.5% AEP) SoP	155,710	184,319
Option 3d - Improve – flood walls only 1in500 year (0.2% AEP) SoP	162,308	191,162
Option 5a - Improve – 28m Bascule Bridge barrier & walls 1in75 year (1.33% AEP) SoP	94,897	141,948
Option 5b - Improve – 28m Bascule Bridge barrier & walls 1in100 year (1% AEP) SoP*	95,118	Not calculated
Option 5c - Improve – 28m Bascule Bridge barrier & walls 1in200 year (0.5% AEP) SoP	96,005	143,149
Option 5d - Improve – 28m Bascule Bridge barrier & walls 1in500 year (0.2% AEP) SoP	98,773	146,151
Option 9LCU - Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.2% AEP) SoP Un-constrained delivery	135,461	190,901
Option 9LCC - Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.2% AEP) SoP Seasonally constrained delivery	141,621	200,699

*Interpolated values based on trend analysis.

Table 3.10b – Detailed summary of key tidal options whole life (PV) costs (£k)

PV Costs including risk (95 th ile and residual OB) (£k)	Option 1 - Do nothing	Option 2 - Do minimum – maintain	Option 5c - Improve – Bascule Bridge barrier & walls 1in200 year (0.5% AEP) SoP*	Option 9LCU - Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.2% AEP) SoP Un-constrained delivery	Option 9LCC - Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.2% AEP) SoP Seasonally Constrained delivery	Option 3c - Improve – flood walls only 1in200 year (0.5% AEP) SoP*
Cost Item						
Existing staff costs	0	0				
Consultants' fees	0	0				
Contractors' fees	0	0	13,109	13,109	13,109	29,530
Site investigation and survey	0	0				
Site supervision	0	0				
Construction	0	0	42,270	67,216	73,714	102,426
Adjusted optimism bias barrier	0	0	1,815	3,258	3,755	
Adjusted optimism bias walls	0	0	1,898	1,882	1,882	14,057
Risk contingency (50 th ile)	0	0	21,253	32,698	32,698	
Legal and stakeholder fees	0	0	* Included above	* Included above	* Included above	* Included above
Subtotal	0	0	80,345	118,163	125,158	146,013
Future costs (construction and maintenance)	0	363	12,046	13,307	12,665	7,460
Optimism bias	0	109	3,614	3,992	3,800	2,238
Project total (present-value) costs	0	472	96,005	135,462	141,623	155,711

Option ranking and economic appraisal conclusion

Table 3.11a presents the findings of the economic analysis of tidal options when partnership funding contributions are excluded from the calculation, as mentioned above Option 9 is excluded from this table as it did not achieve a BCR of greater than 1 and therefore could only be considered as a Local Choice option as presented in Table 3.11b. The analysis confirms that the option with the highest average BCR is Option 5 – 28m tidal barrier and flood walls BCR of 1.2. None of the Option 3 permutations achieve a BCR of greater than 1 and are therefore rejected from further consideration.

Applying the appraisal decision-making criteria, the options with the highest benefit-cost ratio are the Bascule Bridge barrier & walls options where Options 5a, 5b, 5c and 5d all have a BCR of greater than 1 (1.2). The option with the highest NSPV is “Option 5c Bascule Bridge barrier & walls – 1 in 200 year (0.5% AEP)”. The next option that provides greater benefits (option 5d) does not achieve the required iBCR of greater than 5. Indicating that “**Bascule Bridge barrier & walls – 1 in 200 year (0.5% AEP)**” is the nationally economically preferred option.

It is therefore recommended that Option 5c Bascule Bridge barrier and walls providing a SoP of 1in200 year (0.5% AEP) is taken forward as the most economically advantageous and the National preferred economic option on which any FCERM GiA

entitlement will be based. There are no other overriding factors that affect economic option selection.

However, it is the intention of ESC that the Local Choice Option 9 40m tidal barrier and tidal flood walls will be taken forward for delivery subject to sufficient additional partnership funding being secured.

Further detail can be found on the Tidal Economic Appraisal Note (Appendix E1) and the tidal appraisal summary sheet (Appendix F14).

Table 3.11a – Tidal Option ranking and appraisal summary (excluding contributions)

Option	Present Value costs (£k)	Present Value damages** (£k)	Present Value benefits (£k)*	Average benefit: cost ratio (BCR)	Net Social Present Value NSPV (£k)	Incremental benefit: cost ratio (IBCR)	Option for incremental calculation
1 Do nothing	0	148,720	N/A	N/A	N/A	N/A	N/A
2 Do minimum – maintain	472	148,720	N/A	N/A	N/A	N/A	N/A
3a Improve – flood walls only - 1in20 year (5% AEP)	151,092	82,936	67,600	0.4	-83,492	BCR ≤1	N/A
3b Improve – flood walls only - 1in75 year (1.33% AEP)	151,752	66,432	84,567	0.6	-67,185	BCR ≤1	N/A
3c Improve – flood walls only - 1in200 year (0.5% AEP)	155,710	61,271	89,845	0.6	-65,865	BCR ≤1	N/A
3d Improve – flood walls only - 1in500 year (0.2% AEP)	162,308	41,632	109,549	0.7	-52,759	BCR ≤1	N/A
5a Improve – Bascule Bridge barrier & walls - 1in75 year (1.33% AEP)	94,897	34,375	115,652	1.2	20,755	N/A	N/A
5b Improve – Bascule Bridge barrier & walls - 1in100 year (1% AEP)	95,118	33,666	116,361	1.2	21,243	N/A	N/A
5c Improve – Bascule Bridge barrier & walls - 1in200 year (0.5% AEP)	96,005	30,829	119,197	1.2	23,192	Highest NSPV	N/A
5d Improve – Bascule Bridge barrier & walls - 1in500 year (0.2% AEP)	98,773	29,061	120,966	1.2	22,193	0.6	Option 5c

*Including human health intangibles

** Tourism and amenity benefits and reputational damages are excluded from all options

Economically preferred option highlighted in green

Table 3.11b – Local Choice Tidal Option ranking and appraisal summary (excluding contributions)

Option	Present Value costs (£k)	Present Value damages** (£k)	Present Value benefits (£k)*	Average benefit: cost ratio (BCR)	Incremental benefit: cost ratio (IBCR)	
5c*	Improve – 28m Bascule Bridge barrier & walls - 1in200 year (0.5% AEP)	96,005	30,829	119,197	1.2	N/A
9LCU	Option 9LCU - Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.2% AEP) SoP Un-constrained delivery	135,461	30,829	120,401	0.9	0
9LCC	Option 9LCC - Improve – 40m Bascule Bridge barrier & walls 1in200 year (0.2% AEP) SoP Seasonally constrained delivery	141,621	30,829	120,401	0.9	0

* Option 5c included for comparison

** **Tourism and amenity benefits and reputational damages are excluded from all options**

3.6. Non-financial benefits appraisal (Tidal)

The shortlisted options were appraised based on economic, technical, environmental and social factors and considering the feedback from key stakeholders and public consultation. To assist in the appraisal of options and assess the impacts on a number of key objectives including non-financial benefits, an Appraisal Summary Tables (AST) was produced during the Outline Business Case, these are included in Appendix F14.

3.7. Impacts on the regional economy (Tidal)

The Port of Lowestoft has played a key role in the nation's energy security for over 45 years and its location places it at the centre of the world's largest offshore renewable energy market. As a result, it will be serving up to £16billion of wind energy projects (over half of the total UK investment) that will be delivered before 2030 and will continue to support the operation and maintenance for over 30 years. However, the critical transport and utilities infrastructure is at significant risk of tidal flooding, as was proven during the 2013 storm surge which resulted in weeks of disruption.

Wider economic benefits

The Lowestoft Economic Footprint and Impact Report [was revised in 2022](#) (Appendix F3) to consider the wider impacts of flooding on the local Lowestoft economy and the economic growth benefits that tidal flood protection would provide.

The study found that the current economic footprint of project benefit area is estimated to provide **6,400 direct jobs** and generates £342m of annual GVA. When indirect and induced benefits are included, this increases to **8,300 jobs and £443m GVA** per year. Although the indirect and induced effects are not necessarily located in tidal flood plain area, they depend on it – such as businesses supplying the renewable energy sector operations. [The study found that the future economic footprint of the area could support 12,000 direct jobs which could generate £641m of annual GVA, increasing to 15,600 Jobs and £833m GVA per year when indirect and induced benefits are considered.](#)

The study concluded that that under the current flood risk management conditions (Do minimum) with no formal tidal defences **30%** of jobs and **30%** of GVA within the current economic footprint of Lowestoft are impacted in a 0.5%AEP (1in200yr) tidal flood event. Once climate change is considered the level of impact increased **62%** and **62%** respectively. The provision of tidal defences to the 0.5% AEP standard

would reduce this impact to 6% for the current economic footprint and 22% for the future economic footprint when climate change is taken into account.

In addition, the decline of previous industrial operations has left a legacy of large areas of derelict waterfront land and severe social challenges. Partly due to the costs of site-level flood mitigation to reduce the risk of flooding to a 1 in 200 level necessary to make commercial development viable, flood risk is significant barrier to business growth and job creation. Therefore, by addressing flood risk, the LFRMP will significantly reduce the likelihood of severe direct and indirect economic impact and unlock future growth and investment. As a result, studies show that the LFRMP will support the generation of 5,600 additional direct jobs locally and 1,700 indirect and induced jobs nationally. It will also support the generation of an additional £299m GVA in the area per year.

Future development of the local economy was also considered, and the report concluded that the construction of tidal flood defences 'Will lessen the likelihood of economic devastation as well as removing potential barriers to growth and investment by current and future businesses in the area.'

Whilst this assessment is not considered in the national economic analysis undertaken for this FCERM business case it is a critical driver for other sources of funding and is a key piece of supporting evidence for the NALEP funding business case (Appendix N2) illustrating the wider benefits of providing flood risk reduction to Lowestoft.

3.8. Preferred economic option (Tidal)

The appraisal of tidal options has confirmed that Option 5c – Bascule Bridge barrier and walls with a 1in200 year (0.5% AEP) SoP is the most economically advantageous and the national economic preferred option for the management of tidal flood risk in Lowestoft.

Table 3.12 summarises the outcome measures associated with the implementation of Option 5c with a 1in200 year (0.5% AEP) SoP and considering the 95%ile QRA risk plus adjusted optimism bias. Full details are included in the tidal partnership funding calculator included in Appendix A1.

Table 3.12 – Nationally Economically Preferred tidal option Outcome Measures (costs with 95%ile risk and adjusted OB)

Contributions to applicable outcome measures	Value
Outcome 1 – Ratio of whole-life benefits to costs	
Present value benefits (£k)	119,197
Present value costs (£k)	112,881
Benefit: cost ratio (Partnership Funding Calculator BCR)	1.1
Outcome 2 – Households and NRP at reduced risk	
rOM2A - Number of households better protected against flood risk (today)	226
rOM2A.b - Number of households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands	126
rOM2A.c - Number of households moved out of the 'very significant', 'significant' or 'intermediate' flood risk bands to lower risk bands in the 20% most deprived areas	125
rOM2A.PLP - Number of households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands through PLP measures	-
rOM2B - Additional households better protected against flood risk in 2040 (adaptation)	42
rOM2B.b - Additional households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands in 2040 (adaptation)	-
rOM2B.c - Number of households moved out of the 'very significant', 'significant' or 'intermediate' flood risk bands to lower risk bands in 2040 in the 20% most deprived areas (adaptation)	-
rOM2.NRP - Number of non-residential properties better protected against flood risk	152

Contributions to applicable outcome measures	Value
rOM2A.NRP - Number of non-residential properties better protected from flood risk (today)	137
rOM2B.NRP - Number of non-residential properties better protected from flood risk in 2040	15
Partnership funding & FCERM-GiA	
Raw Score	10%
Partnership contribution required to achieve 100% (capital Investment) (£k)	87,804
FCERM-GiA available (assuming partnership contribution achieved) (£k)	9,418

3.9. Sensitivity analysis (Tidal)

The tidal economic analysis assessed a number of sensitivity tests as part of the economic analysis further detail is included in the Section 6.1 of the Tidal Economic Appraisal Note (Appendix E1). The main observation was that costs would have to increase (or benefits reduce) by a factor of 6% to become uneconomic with a BCR below 1. This would be an increase in cost (or reduction in benefits) of £6.3 million.

PF calculator sensitivity

The partnership funding calculator includes a number of sensitivity tests detailed in Table 3.13.

Table 3.13 – Tidal preferred option outcome measures sensitivity tests

PF calculator sensitivity test	Raw score
Main scenario	10%
Sensitivity 1 - Change in PV Whole Life Cost (25% increase)	N/A*
Sensitivity 2 - Change in OM2 - 50% of households in Very Significant (Before) risk may already be in Significant Risk band	10%
Sensitivity 3 - Change in OM3 - 50% of households in Medium Term loss (Before) may already be in Long Term loss	N/A
Sensitivity 4 - Increase Duration of Benefits by 25%	10%
Sensitivity 5 - Reduce Duration of Benefits by 25%	10%
Sensitivity 6 - Strategic considerations not demonstrated	4%
Sensitivity 7 - Change in environmental habitat optimistic	N/A

* Reduces BCR to 0.9 so does not qualify for PF GiA

These sensitivity tests indicate that the project is most susceptible to an increase in PV whole life costs where a 25% increase in cost would result in a reduction of the BCR (PF calculator) to 0.9 and therefore does not qualify for PF GiA. The risk of this scenario occurring has been mitigated thorough through option delivery costing, taking a conservative assessment of whole life costs and making robust risk allowances.

Threshold level sensitivity

The sensitivity of the economic analysis to changes in threshold levels of +/- 0.1m considered. The impact this change was indicated to be changes in total benefits of +15% and -19%. A reduction in benefits of 19% would reduce the PF BCR to 0.9 and an increase of 15% would increase the PF BCR to 1.2.

Climate change and CFB change Sensitivity

Climate change guidance and the coastal flood boundary data set have both been updated since the projects hydraulic modelling was initial completed in 2017. In the interests of efficiency, it was agreed that a sensitivity analysis would be undertaken to consider the relative impacts of these changes on the project's economic analysis. Detailed discussion of this sensitivity test can be found in Section 6.1.1 of the Tidal

Economic Appraisal Note (Appendix E1). This sensitivity test concluded that whilst it was not possible to quantify the precise effect of these changes on the benefits calculation on balance it is likely there is a small overestimation of the damages due through the continued use of the 2017 modelling. Given the fact the economic analysis has omitted a number of benefit categories in the assessment in the interests of proportionality it is considered that the current assessment is considered to be lower-bound. In particular should a small percentage of the excluded recreational benefits be included in the analysis this could balance a slight reduction due to change in model boundary conditions. It is also considered that the change of modelled boundary conditions would have no significant impact on the selection of the nationally economically preferred option.

Sensitivity to tidal surges

As mentioned in the Strategic Case (Section 2.1) Lowestoft's Low tidal range makes the town increasingly vulnerable to the effects of tidal surges. Recent studies (inc. Assessment of tidal range changes in the North Sea from 1958 to 2014. *Journal of Geophysical Research: Oceans*¹³) have indicated that observed changes in the North Sea amphidromic point locations due to greater mean depth combined with impacts of surges and climate change impacts could impact Lowestoft more than most other locations. This could result in increased extreme water levels as the effects of climate change become more pronounced. Further detailed assessment would need to be completed to fully understand these potential impacts. As noted above the sensitivity to sensitivity for thresholds levels indicated a decrease of -0.1m (or increase in water level of +0.1m) would generate an additional £17.9m of benefits. Whilst this would not make the local choice options cost beneficial it strengthens the position of the nationally preferred economic option.

3.10. Local Choice

As mentioned above, ESC has selected a local choice option to deliver a 40m wide tidal barrier and flood walls to provide an increased level of resilience to the tidal barrier and lessen future constraints on future changes to the Lake Lothing entrance channel. In line with Local Choices framework under the PF policy, the additional costs for delivering the Local choice option over the national economically preferred option need to be funded entirely through contributions.

The project will deliver National Government outcomes for at least six Government Departments and contribute significantly to the growth of the economy.

The scheme aims to underpin the wider development of Lowestoft port as a central hub for marine and offshore industry notably supporting an accelerated delivery programme for Associated BP LEEF project and as a marine transport hub for the Sizewell C nuclear power station (national infrastructure project).

The selection of a 40m wide tidal barrier for delivery over the 28m barrier option delivers a number of additional benefits that cannot be fully represented in the FCREM economic appraisal:

- Increases the resilience and reliability of the tidal barrier when considering ship impacts.
- Creates adaption pathways to future proof the Port by placing less of a restriction on any potential future widening of the Lake Lothing entrance channel, enabling future growth opportunities for the Port and Lowestoft.

¹³ Jänicke, L., Ebener, A., Dangendorf, S., Arns, A., Schindelegger, M., Niehüser, S., Haigh, I. D., Woodworth, P. and Jensen, J., 2021. Assessment of tidal range changes in the North Sea from 1958 to 2014. *Journal of Geophysical Research: Oceans*, 126(1), p.e2020JC016456.

Delivery of the 40m barrier also provides an opportunity for an accelerated delivery approach which has been referred to as the unconstrained delivery option (Option 9LCU). This brings with it the following additional benefits:

- Reduces the programme for completion of the tidal defences by 2 years, reducing the period that Lowestoft does not benefit from a reduction in tidal flood risk. Reducing the risk to both property and people's health.
- Projected delivery efficiency of £6.5m in PV terms and £9.9m in cash terms
- Accelerated delivery of the tidal defences supports the delivery of the ABP LEEF project.

Whilst the local choice options are shown to have BCR's of less than 1, consideration has been given to potential benefits that have not been included in the economic appraisal. As detailed in the Tidal Economics report (Appendix E1) A potential benefits pool of £194m (PV) associated with the Tourism and reputational damages (principally reputational damage) has been identified but not included due to approximate nature and subjectivity around the assessment. A rough calculation indicates that inclusion of 11% of these potential damages as benefits would be sufficient to provide the unconstrained delivery local choice option (Option 9LCU) with a BCR of greater than 1.

4. The pluvial fluvial FRM economic case

The pluvial fluvial works (Option 6) have been completed since the 2018 OBC was assured with works to reduce the impact of pluvial flooding (surface water) completed in December 2021 and works to reduce the risk of fluvial (river) flooding were completed in July 2021. The fluvial works were delivered as planned and inline with the information outlined in the sections below. Due to a lower than expected uptake of PLR (pluvial) measures by residents and property owners PLR measures were installed in 120 properties. Example photographs of the completed pluvial and fluvial works are included in Appendices C6.

The text below remains the same as in the 2018 OBC and **has not been updated** with financial values and the economic assessment unchanged from the original submission.

4.1. Introduction (Pluvial Fluvial)

The development and economic appraisal of the pluvial fluvial element of the project is fully documented in the Pluvial Fluvial Options¹⁴ and Economic Analysis¹⁵ reports (Appendix F1 and E4 respectively), the following sections present the key information from this reporting which builds on work undertaken at SOC stage in the Lowestoft Drainage Strategy - Pluvial / Fluvial Options Report¹⁶ (Appendix F19). As stated in Section 3.2, the pluvial fluvial and tidal economic cases have been separated to improve clarity of the relative benefits and funding sources.

¹⁴ Pluvial fluvial options report, JBA, 2018

¹⁵ Pluvial fluvial economic appraisal Report, JBA, 2018

¹⁶ Lowestoft Flood Risk Management Strategy, Lowestoft - Fluvial / Pluvial Options Report, Atkins, Dec 2016

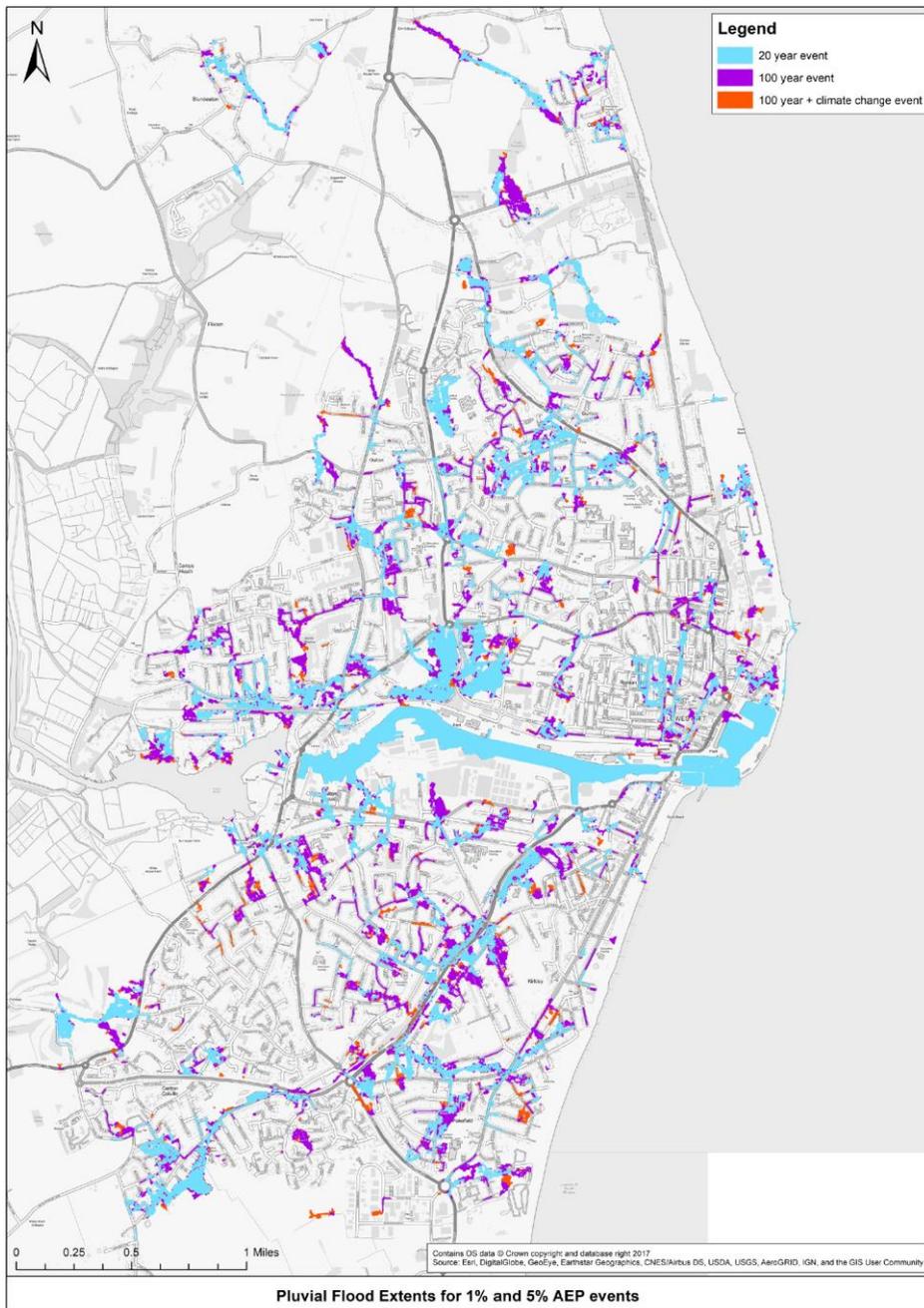


Figure 4.0 pluvial flood extents in study area

4.2. Critical success factors (Pluvial Fluvial)

The factors in Table 4.1a have been used to inform the assessment of the pluvial/fluvial flood defence options considered in this OBC these have been significantly refreshed since SOC stage.

Table 4.1a Critical Success factors – Pluvial/Fluvial

No	Critical Success Factor	Measurement Criteria	Importance (1-5)
1	Strategic fit and business needs	<ul style="list-style-type: none"> Adapting to climate change. Delivery of strategic management plan Publicly supported. 	1
2	Value for money	<ul style="list-style-type: none"> Protect and enhance the local economy by avoiding flood damage to residential and commercial properties, economic assets, and infrastructure. Positive Net Present Value. Increase the life-span of adjacent properties and assets. 	2

3	Potential achievability	<ul style="list-style-type: none"> Local authority capacity to produce and manage the project. Key project stakeholders are supportive of proposals, giving positive feedback. Community are aware and understand project drivers and timescales. 	3
4	Supply side capacity	<ul style="list-style-type: none"> Supply side capability to deliver affordable solution within the timeframe. 	4
5	Potential affordability	<ul style="list-style-type: none"> Achievable within government funding. Further efficiency savings identified as the preferred option is further developed. 	5

The options report also identifies a second set of specific objectives for the management of pluvial fluvial flood risk included in Table 4.1b.

Table 4.1b Pluvial/Fluvial specific objectives

No	Fluvial/Pluvial Outline Business Case Objectives
1	Reduce the risk of household flooding.
2	Support amenity and regeneration in Lowestoft.
3	Maintain and enhance natural, historic, visual and built environments.
4	Promote sustainable management of existing watercourses and drainage networks.
5	Ensure an affordable and deliverable whole life option through a partnership approach and contributions.
6	Ability to secure funding.

4.3. Long list options (Pluvial Fluvial)

A number of options were considered for the management of pluvial fluvial flood risk in Lowestoft. Options 1 to 15 focused primarily on fluvial flooding in the area around The Street in Carlton Colville, Tom Crisp Way and Aldwyck Way and Velda Close. Options 16 to 19 focused primarily on reducing flooding from pluvial sources in the Lowestoft area, with particular attention to areas identified to be at risk. These are summarised in Table 4.2. Further information/detail can be found in the Options Report (Appendix F1).

Table 4.2 – Pluvial/Fluvial Long list of options

Option	Description	Flood Mechanism	Short list or rejection
Do Nothing	No maintenance of existing systems	Fluvial and Pluvial	Shortlist (baseline for economics)
Do minimum	Continue to maintain existing drainage systems	Fluvial and Pluvial	Shortlist (baseline)
LL_01	Create new storage and restrict flows	Fluvial	Shortlist Option 1
LL_02	Additional storage in existing green spaces	Fluvial	Shortlist Option 1
LL_03	Re-routing of the watercourse	Fluvial	Shortlist Option 1 and 2
LL_04	Reducing flows from upstream watercourses	Fluvial	Shortlist Option 1
LL_05	Throttle flows to use capacity in existing drainage system	Fluvial	Rejected
LL_06	Creation of embankments	Fluvial	Shortlist Option 2
LL_07	Installing a two-stage channel in Kirkley Stream	Fluvial	Shortlist Option 1 and 2
LL_08	Earlier operation of surface water pumps	Fluvial	Shortlist Option 2
LL_09	Increasing capacity of existing storage areas	Fluvial	Shortlist Option 1
LL_10	Removal of silt and re-grading of the watercourse	Fluvial	Rejected
LL_11	Install non- return valves on the network.	Fluvial	Shortlist Option 4
LL_12	Not used	Not used	-
LL_13	Installing local mitigation measures	Fluvial	Shortlist Option 5
LL_14	Optimising throttles in the river	Fluvial	Shortlist Option 2

Option	Description	Flood Mechanism	Short list or rejection
LL_15	Strategic non-return valves and underground storage	Fluvial	Shortlist Option 4 (NRV's only)
LL_16	Offline storage in the public sewer system	Pluvial	Rejected
LL_17	Increased conveyance in the public sewer system	Pluvial	Rejected
LL_18 & LL_19	Implementation of SuDS (20% & 40 reduction in impermeable are in each TARZ).	Pluvial	Shortlist Option 3

A detailed description of why options were shortlisted or rejected can be found in sections 4.3 and 4.4 of the pluvial fluvial options report (Appendix F1).

At SOC stage the benefit of utilising a tidal barrier for water level management to reduce the period of tide locking for the Kirkley Stream and other outfalls was considered. It was rejected due to significant impacts on navigation and the tidal regime within Lake Lothing, this option was not re-considered at OBC stage.

4.4. Shortlisted options (Pluvial Fluvial)

Overview

The five shortlisted improvement options for providing pluvial fluvial flood defence to Lowestoft taken forward following consultation and agreement with the project's key stakeholders are listed in Table 4.3 with a summary description of each option. Further detail describing each option can be found within the Lowestoft Fluvial/Pluvial Options report which is included in Appendix F1.

Table 4.3 – Pluvial/Fluvial short list of options

Short listed Option	Option Description
Do minimum – maintain	Continued maintenance of the existing drainage network as is currently undertaken.
1 Storage (Fluvial)	Increase the storage capacity along the Kirkley Stream. Long list options 1, 2, 3, 4, 7 and 9 were progressed and included in the shortlisted option 1, which focuses on storage of storm water. Long list options 1, 3, 4 and 9 produced beneficial results to lower flood risk and long list option 2, although it did not show any specific benefit in flood risk reduction was included to investigate linkage with wider strategic storage option.
2 Conveyance (Fluvial)	Increasing conveyance of water along the Kirkley Stream. Conveyance (Fluvial): long list options 3, 6, 7, 8 and 14 were progressed and included in short list option 2 which focuses on increasing fluvial conveyance. Long list options 6 and 7 showed limited benefit and long list option 14 did not bring benefits but these options were considered as part of a wider strategy.
3 SUDS (Pluvial)	Sustainable Urban Drainage Systems SuDS (Pluvial): long list options 18 and 19 were progressed to shortlist options 3a and 3b, focusing on the implementation of SuDS to reduce impermeable areas by 20% and 40% respectively. Both long list options showed significant flood risk reduction and were therefore investigated further as part of a shortlisted option.
4 Non return Valves (Fluvial)	Installing non-return valves (to reduce the risk of water from Kirkley Stream backing up into the drainage network). long list option 15 showed no benefit, however, the use of non-return valves was decided to be investigated further as a widespread use.
5 Property Level Resilience (PLR)	Local mitigation measures such as property level resilience measures long list option 13 involves local mitigation measure and would, by nature, benefit each property where these would be installed.

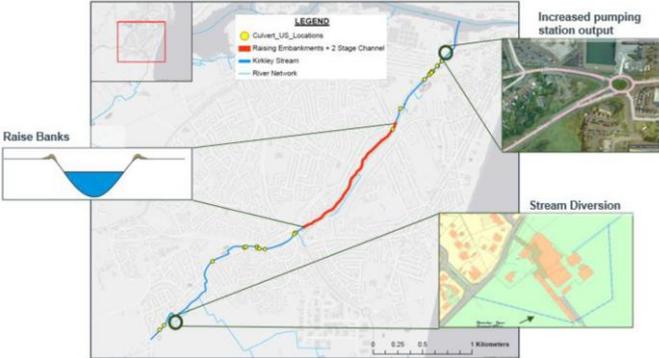
Technical assessment

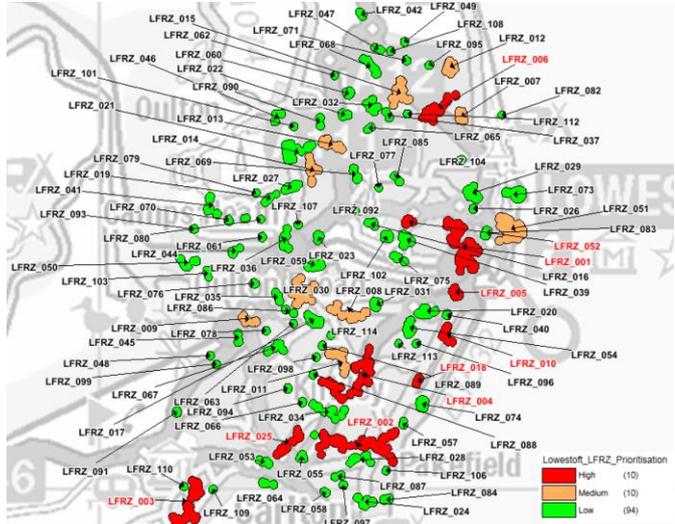
Table 4.4 contains a summary of the technical description of options for the reduction of pluvial fluvial flood risk. This table is summarised from Section 5 (Options Appraisal

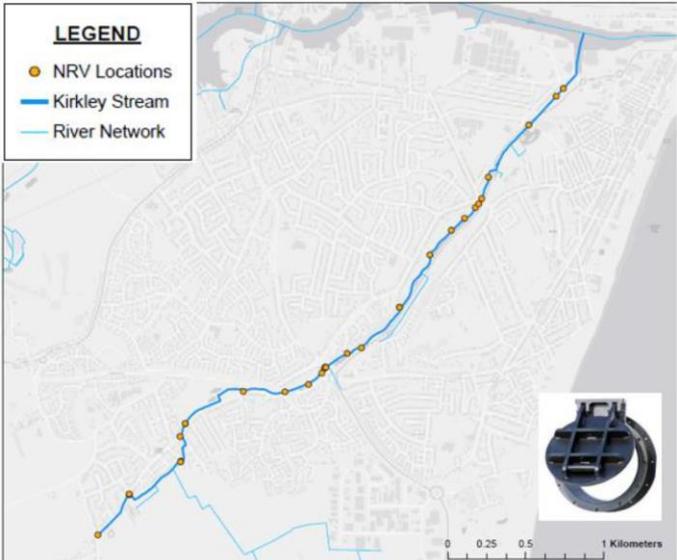
and Comparison) of the Pluvial Fluvial Options Report Appendix F1). Further non-technical details of the shortlisted options can be found within the Lowestoft FRMP public consultation document (Appendix G2).

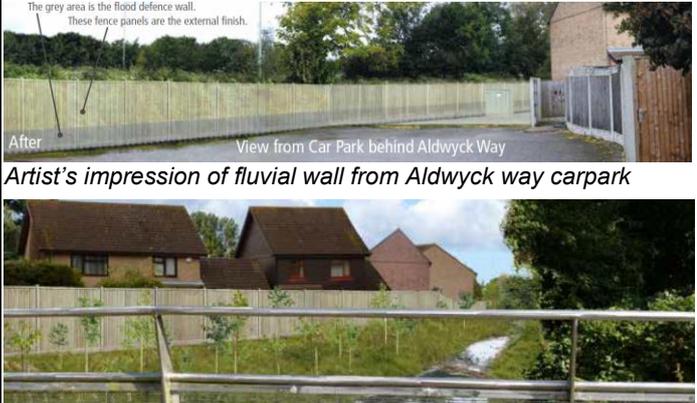
Table 4.4 – Technical description of Pluvial/Fluvial short list of options

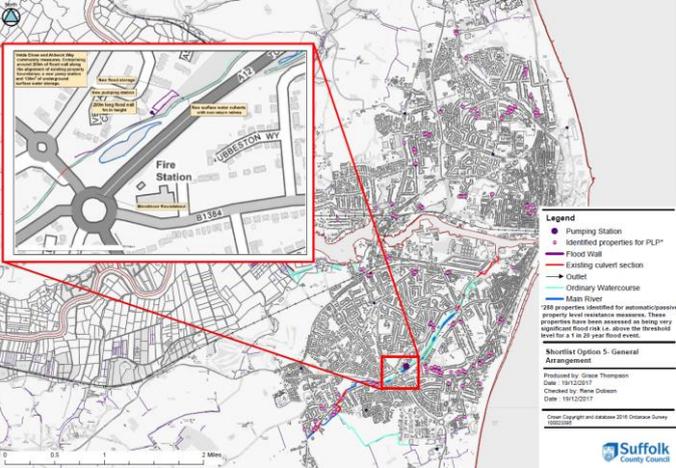
Shortlisted Option	Option Technical Description and Technical Assessment	Taken forward / rejected
Do minimum – maintain	Continued maintenance of the existing pluvial fluvial drainage systems.	<i>Option taken forward as baseline</i>
1 Storage (fluvial)	<p>The option seeks to increase of storage along the Kirkley Stream through the construction of following:</p> <ul style="list-style-type: none"> • Construct 3,400m³ of storage in Meadow Park as offline flood storage.  <ul style="list-style-type: none"> • Construct 15,100m³ of storage upstream of Carlton Colville  <ul style="list-style-type: none"> • Implement a two stage channel from Bloodmoor Roundabout to the New Road bridge.  <ul style="list-style-type: none"> • Re-establish the maximum design capacity in the existing storage area off Tom Crisp Way. 	<i>Option rejected.</i>

Shortlisted Option	Option Technical Description and Technical Assessment	Taken forward / rejected
	 <p>Although technically feasible, the land needed to incorporate sufficient flood storage is not available at this time. The two-stage channel option is also technically feasible, but the environmental impact would be detrimental and is therefore rejected.</p>	
2 Improve conveyance (fluvial)	<p>The option involves the following components to increase conveyance along the Kirkley Stream:</p> <ul style="list-style-type: none"> Divert the Kirkley Stream around Belle Vue Farm. The new culvert (2000mm x 2000mm) connects into the existing tributary to the south of the existing route. Diverted flow reconnects downstream into the Kirkley Stream.  <ul style="list-style-type: none"> Raise river banks on the Kirkley Stream from the Bloodmoor Roundabout to New Road bridge totalling 2.98km.  <ul style="list-style-type: none"> Upsize 27 culverts along Kirkley Stream by 25%. Increase Kirkley Stream terminal pumping station output capacity from 1.2m³/s to 5.35m³/s 	Option rejected.

Shortlisted Option	Option Technical Description and Technical Assessment	Taken forward / rejected
	<p>The diversion of the Kirkley Stream around Belle Vue Farm is technically feasible as an open channel but increases flows routed to Low Farm Drive and therefore flood risk. This option could only be completed in conjunction with the flood storage considered and rejected in Option 1. The sub-options to create new flood embankments and increase the capacity of 27 culverts is not technically feasible as there is insufficient space to construct the structures. However, the hydraulic modelling of increased capacity of the Kirkley Stream pump station did not show any damages averted and was therefore rejected.</p>	
<p>3a & 3b SUDS (Pluvial)</p>	<p>Options 3a and 3b seek to reduce the amount of impermeable area which generates runoff from entering the existing sewer system by 20% and 40% respectively through the implementation of SuDS. As part of the OBC options appraisal, further investigation into the opportunities available for SuDS was undertaken.</p> <p>The technical assessment of replacing impermeable surfaces with permeable surfaces, was completed focusing on the following points:</p> <ul style="list-style-type: none"> • Identification of Target Area Reduction Zones highlighted in the Drainage Strategy prepared for the SOC. • Estimation of impermeable areas within them using the Lowestoft Mastermap in ArcGIS. • Differentiation of impermeable areas within roads and buildings and identification of potential areas for the implementation of SuDS such as roads with existing green verges, large commercial buildings, parking spaces or green spaces where surface water could be routed for formal and informal temporary storage. • Estimation and review of the proportion of impermeable area reduced by the implementation of the highlighted SuDS opportunities in each TARZ.  <p>Option 3 (SuDS retrofit) options are not technically feasible options as only around 10% to 15% impermeable area could be retrofitted into permeable areas among the flood risk zones and Option 4 did not show any damages averted</p>	<p><i>Options rejected.</i></p>
<p>4 Non-return Valves (fluvial)</p>	<p>Option 4 included the incorporation of non-return valves on all surface drainage outfalls along the Kirkley Stream to prevent river locking of the drainage network or back flow into the drainage network and causing flooding. 29 NRVs were therefore added to the OBC model and reviewed.</p>	<p><i>Options rejected.</i></p>

Shortlisted Option	Option Technical Description and Technical Assessment	Taken forward / rejected
	 <p>The hydraulic modelling indicates that there is no direct benefit of implementing non-return valves on all surface drainage outfalls. This option was therefore rejected.</p>	
5 Property Level Resilience (PLR)	<p>Option 5 looks at the introduction of Property Level Resilience on a large scale to protect properties that fall within the very significant flood risk banding. The technical assessment of this option included a desk study complemented by a site visit inspection to validate potential local scheme feasibility and investigate areas where information was missing. It was proposed that in areas where Property Level Resilience was proposed for multiple properties there would be potential to install community schemes that could mitigate against local surface water flood risk and provide wider benefits.</p>	<p><i>Option taken forward as Option 6 when combined with 5b.</i></p>

Shortlisted Option	Option Technical Description and Technical Assessment	Taken forward / rejected
	 <p data-bbox="496 1171 753 1198"><i>PLR property Locations</i></p> <p data-bbox="496 1227 1193 1391">This option is potentially technically feasible subject to confirmation by detailed property surveys. The measures need to be effective against short duration high intensity rainfall events, which are difficult to predict and have very little advanced warning. Therefore, the PLR needs to be an automatic/passive system that operates without the need for assembly.</p>	
<p data-bbox="304 1402 491 1518">5b Community scheme at Velda Close and Aldwyck Way</p>	<p data-bbox="496 1402 1193 1570">Fourteen sites with potential for community schemes were identified as part of a desk study for Option 5b and their practicability and suitability assessed during a site survey. The on-site investigations revealed that none were obviously suitable with the exception of properties at Velda Close and Aldwyck Way.</p>  <p data-bbox="496 1579 1193 1608">The grey area is the flood defence wall. These fence panels are the external finish.</p> <p data-bbox="496 1709 1193 1738">After View from Car Park behind Aldwyck Way</p> <p data-bbox="496 1742 1193 1771"><i>Artist's impression of fluvial wall from Aldwyck way carpark</i></p> <p data-bbox="496 1984 1193 2033"><i>Artist's impression of fluvial wall from footbridge adjacent to Bloodmoor Road towards Velda Close properties.</i></p>	<p data-bbox="1198 1402 1391 1518"><i>Option taken forward Option 6 when combined with 5.</i></p>

Shortlisted Option	Option Technical Description and Technical Assessment	Taken forward / rejected
	<p>A number of options and configurations were considered for Velda Close and Aldwyck Way. The technical assessment indicates that the preferred scheme is direct defence along the Kirkley Stream, approximately 200m long by around 1m high (top of existing bank level), with a pump station with a capacity of around 300 l/s.</p>  <p>The map displays the proposed flood wall and pump station along Kirkley Stream. Key features include: <ul style="list-style-type: none"> Pumping Station: Located near the intersection of Velda Close and Aldwyck Way. Flood Wall: A red line indicating the proposed wall along the stream. Existing culvert section: Shown as a dashed line. Outlet: Indicated by an arrow pointing downstream. Ordinary Watercourse: Shown as a blue line. Main River: Shown as a thick blue line. A legend in the bottom right corner provides details on the symbols used. It also notes that 288 properties are identified for automatic-passive property level resilience measures. The map is titled 'Shortlisted Option 5: General Arrangement' and includes production and check dates from 2017. The Suffolk County Council logo is present in the bottom right corner of the map area.</p>	

Full details of the technical assessment of the shortlisted options is presented in Section 5 of the Pluvial Fluvial Options report (Appendix F1). Annex B of the options report presents the Options Appraisal Summary Table which highlights the key technical differences between the shortlisted options.

Environmental assessment

At SOC stage a detailed a SEA Environmental Report (annex to Appendix H1) was produced, assessing the potential environmental impacts, in combination effects and identifying enhancement opportunities for all shortlisted options. Strategic WFD and HRA assessments were also completed (Appendix H3 and H5 respectively). Further option development at OBC identified an additional shortlisted option (Option 6 – PLR and Velda Close wall). A Preliminary Environmental Information Report (Appendix H1) and revised WFD and HRA assessments have also been produced for the preferred option. Table 4.5 summarises the key environmental effects and opportunities for the revised shortlisted pluvial fluvial options and has been refreshed for the preferred option, highlighting any changes as a result of the more detailed assessment, please note that with the exception of Option 6, reference to property numbers is based on SOC stage and differ from OBC stage. This is not considered to be of concern as these options were removed from the shortlist for other technical reasons as detailed in the Options Report (Appendix F1).

Table 4.5 – Key environmental effects and opportunities (pluvial fluvial)

Shortlist option 1: Storage (fluvial) (SOC option – 1 Upstream storage)	
Key positive effects	<p>Option is likely to reduce flood risk to three commercial (SOC stage) and one residential (SOC stage) properties for a 1in75 year return period (and one commercial and two residential properties, for a 1in75 year RP+ climate change). As the benefit is only partial, a minor positive effect has been predicted.</p> <p>Storage may provide opportunities for habitat improvement/enhancement, positively affecting biological elements for example by providing an offline refuge for fish or improving opportunities for aquatic invertebrates. These improvements depend on the design specification but adverse effects to waterbodies are not anticipated.</p>
Key negative effects	<p>Where upstream storage is proposed at Carlton Colville, dependent on current land use (if for farming) and the proposed design, the option may affect farming practice for a small population, details of which are not known at this stage therefore uncertain effect</p>

	(as part of split assessment) predicted against economic development objective. (uncertain effect). Southern part of the area is within the Hundred Tributary Valley Farmland Landscape Character Area; effect of the storage facility on this area will be dependent on the design. (uncertain effect).
Mitigation or enhancement opportunity	Potential for habitat creation as part of storage areas.
Shortlist option 2: Improving conveyance (Fluvial)	
Key positive effects	None identified
Key negative effects	Although the option will reduce flood risk to nine residential properties (SOC stage) and six 'other' type properties, it is likely to introduce risk of flooding to eight residential (SOC stage) properties for a 1in75 year RP; similarly, in a 1in75 year RP+ climate change, the option might increase the risk of flooding to 13 residential properties, but reduce the risk to some 22 residential properties, minor positive impact in the long term, but negative and positive effect in the short to medium term. Short term negative effect on biodiversity to vegetation clearance and disturbance to habitats may occur.
Mitigation or enhancement opportunity	Consideration could be given to the river restoration techniques, where compatible with the option aim of improving conveyance.
Shortlist option 3a: Sustainable Drainage Systems (Pluvial - 20% permeable surface)	
Key positive effects	Option 3a (20% reduction) is likely to reduce the risk of flooding to 57 residential (SOC stage) and three commercial (SOC stage) properties for a 1in75 year RP and for 54 residential and nine commercial properties for a 1in75 year RP + climate change, therefore minor positive effect predicted for the population and human health and economic development objectives. Proposed option is likely to help reduce risk of flooding to key infrastructure such as the A12 and A117, Wellington Esplanade (B1532), A146/B1531, A146/Bridge Road and on the access road to Oulton Broad South Rail Station and part of the A12, linking to the Outer Harbour area and to the Lowestoft Station.
Key negative effects	LFRZs 001, 004, 007, 008, 009 and 052 are known to contain historic landfill sites. Dependent on the location and works involved to construct and maintain SUDS, the proposed option might have a neutral or a negative effect on the land contamination objective (assuming without appropriate mitigation).
Mitigation or enhancement opportunity	Habitat creation as part of SUDS system may be possible depending on the systems used.
Shortlist option 3b: Sustainable Drainage Systems (Pluvial - 40% permeable surface)	
Key positive effects	Option 3b (40% reduction) is likely to reduce the risk of flooding to 150 residential (SOC stage) and 27 commercial properties (SOC stage) for a 1in75 year RP and for 56 residential and nine commercial properties for a 1in75 year RP + climate change. This implies significant positive effect in the short to the medium term, but in the long term (with climate change) both options appear to provide similar benefits in terms of property protection, therefore minor positive predicted for Option 3b in the long term under the population and human health and economic development objectives. Proposed option is likely to help reduce risk of flooding to key infrastructure such as the A12 and A117, Wellington Esplanade (B1532), A146/B1531, A146/Bridge Road and on the access road to Oulton Broad South Rail Station and part of the A12, linking to the Outer Harbour area and to the Lowestoft Station. Due to scale and coverage of SUDS, this option is likely to support species and habitats at local nature reserves/ county wildlife sites, Habitats of Principal Importance of wood pasture and parkland in the Carlton Manor area and the priority habitat area of deciduous woodland.
Key negative effects	LFRZs 001, 004, 007, 008, 009 and 052 are known to contain historic landfill sites. Dependent on the location and works involved to construct and maintain SUDS, the proposed option might have a neutral or a negative effect on the land contamination objective (assuming without appropriate mitigation).
Mitigation or enhancement opportunity	Habitat creation as part of SUDS system may be possible depending on the systems used.

Shortlist option 4: Non-return Valves Fluvial (SOC option 4 Non-return Valve installation)	
Key positive effects	Option 4 is likely to reduce impact on one commercial/ tourism related property for a 1in75 year RP scenario, minor positive effect on economic development.
Key negative effects	Although the option will reduce flood risk to two residential properties, it is likely to introduce risk of flooding to one residential property at in a 1in75year RP, but the risk in a 1in75 year RP+ climate change increases to three residential properties with no risk reduction to any property; therefore, not supportive of the population and human health objective for the short-term and the long-term.
Mitigation or enhancement opportunity	None identified
Shortlist option 5a: Local mitigation – Property Level Resilience	
Key positive effects	Assuming the Property Level Resilience (passive) features function correctly, the proposed option is likely to reduce the risk of flooding to 274 residential properties (SOC stage, 281 at OBC stage), and ten commercial properties (SOC stage) representing a significant reduction therefore assigned major positive effect. If historic buildings benefit from PLR, the option will be supportive of the Cultural Heritage objective.
Key negative effects	None assessed
Mitigation or enhancement opportunity	None assessed
New combined Option 6: Property Level Resilience & Community scheme at Velda Close and Aldwyck Way	
Description	This option was not considered at SOC stage and was introduced at OBC stage as a combination of shortlisted Options 5 and 5a. Shortlist option 5a was developed following revised hydraulic modelling undertaken at OBC stage. Further detail of the environmental assessment of this option is contained within the PEIR (Appendix H1) and is summarised below.

PEIR & HRA

A single Preliminary Environmental Information Report (Appendix H1) and HRA (Appendix H3) have been prepared to consider all components of the LFRMP, i.e. tidal, fluvial and pluvial. The key findings of this relevant to all LFRMP components are summarised in Section 3.4 of this OBC.

WFD Assessments

WFD assessments have been completed at both SOC and OBC stages. The SOC stage assessment (Appendix H5) considered all strategic options and concluded that the proposed strategy was not predicted to cause deterioration in waterbody status or prevent the waterbody from meeting its objectives and therefore further assessment against the conditions listed in Article 4.7 is not required. Therefore, the Strategy is compliant with WFD, and no further assessment is required. Further stages of the Strategy should however re-evaluate the risk to the waterbodies when further engineering details become available.

The OBC stage WFD assessment (Appendix H5) considered the preferred option and concluded that the works associated with delivering the fluvial pluvial preferred option would not lead to any significant effects on the WFD waterbodies and have therefore been scoped out of further assessment. Table 4.6 summarises waterbodies in the assessment and identifies the waterbodies considered.

Table 4.6 Extract from WFD assessment, Appendix H5 (Table Error! No text of specified style in document..2: Scoping of project components for detailed assessment)

Project component	Element	Scoped in or out?	Relevant WFD water body(s)
Fluvial	Flood walls along Kirkley Stream from Bloodmoor roundabout culvert for 200m downstream (construction and operation)	Scoped out – the flood walls would be set back from the channel bank. There would be some removal of riparian vegetation, however, re-planting is proposed along the slope face. If during construction the channel bank were to be altered, it would be reinstated as per the baseline conditions	Waveney (Ellingham Mill - Burgh St. Peter) fluvial WFD water body Broadland Rivers Chalk and Crag WFD groundwater
	New pumping station - below ground (construction and operation)	Scoped out – set back from the banks of Kirkley Stream. There would be a new discharge point to the watercourse, but this is highly unlikely to lead to any significant effects to the channel or at a WFD waterbody scale. Therefore, no further assessment has been deemed as required for this scheme element	Waveney (Ellingham Mill - Burgh St. Peter) fluvial WFD waterbody Broadland Rivers Chalk & Crag WFD groundwater
	New flood storage area - below ground (construction and operation)	Scoped out – the water tank is proposed to be located at a level of 0.1m AoD beneath a car park. The water tank would be sealed and therefore it would be highly unlikely to have any significant effect at a WFD waterbody scale on groundwater	Broadland Rivers Chalk and Crag WFD groundwater
Pluvial	Direct defences at 281 properties across Lowestoft. The detail is to be confirmed but could include: flood doors, water proofing, water resisting air bricks, non-return gullies and valves and internal sump pumps (construction and operation)	Scoped out – would be unlikely to lead to any direct or indirect effects to surface watercourses or groundwater as a consequence of localised improvements around individual properties	Not applicable

4.5. Economic appraisal (Pluvial/Fluvial)

The economic appraisal undertaken for the pluvial fluvial options appraisal is contained within the Economic Appraisal Report (Appendix E3).

Options assessed

Further option assessment was undertaken, considering in detail each shortlisted option's suitability against the critical success factor and the technical practicalities of delivery to determine if each shortlisted option should be taken forward for outline design and economic appraisal. Further detail is presented in Section 1.5 of the Option Appraisal Report (Appendix E4), and Table 4.4 above.

Table 4.6 summarises the key option parameters that were taken forward for outline design and economic analysis.

Table 4.6 – Pluvial Fluvial final option description

Shortlisted Option	Option detail for appraisal
No Nothing	-
Do Minimum	-
5 Property Level Resilience	Property Level Resilience to 281 residential properties at risk from a 1in20 year flood. PLR options are assumed to apply to properties in the Very Significant flood risk band; assumed to be the 1in20 year flood for the purposes of this assessment. This restriction is based on partnership

Shortlisted Option	Option detail for appraisal
	funding guidance that does not allow grant in aid for properties in the Significant or Moderate flood risk bands.
6 PLR & Community scheme at Velda Close and Aldwyck Way	PLR for 281 residential properties plus a formal flood defence to protect properties at risk in Aldwyck Way and Velda Close

Benefits

The assessment of damages and benefits was undertaken in line with the requirements of FCERM-AG and further detail can be found in Section 5 of the Options Appraisal Report (Appendix E4).

The PV damages and benefits associated with each of the shortlisted options taken forward for economic appraisal are presented in Tables 4.7a and 4.7b, considering a 20 year and 100 year appraisal period respectively. The 20 year appraisal period was considered as it aligns with the duration of benefits for Option 5 (PLR) and to allow for the replacement of the PLR measures at the end of the appraisal period.

Table 4.7a – Pluvial Fluvial option (PV) damages and benefits 20 year appraisal period

Option	Damage (PVd) (£k)	Damage avoided (£k)	Benefits (PVb)
- Do nothing	31,787	-	-
- Do minimum – maintain	29,251	2,536	2,536
5 Property Level Resilience	17,463	14,324	14,324
6 Property Level Resilience and Community scheme at Velda Close and Aldwyck Way	17,410	14,377	14,377

Table 4.7b – Pluvial/Fluvial option (PV) damages and benefits 100 year appraisal period

Option	Damage (PVd) (£k)	Damage avoided (£k)	Benefits (PVb)
- Do nothing	52,460	-	-
- Do minimum – maintain	47,726	4,733	4,733
5 Property Level Resilience	23,516	28,944	28,944
6 Property Level Resilience and Community scheme at Velda Close and Aldwyck Way	22,393	30,067	30,067

Costs

The assessment of pluvial fluvial options costs is detailed fully in Section 3 of the Economic Appraisal report (Appendix E4), the following sections are summarised from this report. Costs were developed in consultation with project partners and through early contractor involvement.

Baseline

Do minimum baseline costs maintenance costs have been considered in the appraisal as follows:

- Inspection and channel clearance costs of £2,500/km/year. As the reach length is 700m long, this suggests a value of £1,725/annum.
- Periodic channel dredging based on recorded costs of £50,000 for a one-off clearance. This has been assumed to occur every 5 years under the Do Minimum option.

Scheme Costs

The total estimated cost of supplying and fitting the PLR measures is £2,392,715 including the following:

Enabling costs

- £5,000 for public engagement and surveyor procurement
- £126,450 for property surveys (at £450/property)
- £5,000 for procurement and management of contractor

PLR purchase and installation costs

- £2,392,810 for supply and fitting of PLR measures

Additional items for supervision, designer's supervision, GE book and risk derived by Balfour Beatty have also been included. Inflation costs have been omitted from the economic appraisal.

The estimated cost for the Velda Close defence is £500,600. In addition, an enabling cost for design and appraisal has been assumed of £110,000. Additional items for supervision, designer's supervision, GE book and risk have also been included.

Present Values

The costs have all been discounted over a period of 100 years (using the Treasury variable discount rate) to generate a Present Value Cost for each option, including initial capital investment and whole life maintenance costs. Where the 100 year appraisal period is considered, asset replacement (PLR) is included every 20 years. The present value whole life costs are given in Tables 4.8a and 4.8b for the 20 year and 100 year appraisal periods respectively. These include risk allowance in line with current Environment Agency risk management guidance which is further discussed in Section 3.2 of the Economic Appraisal Report (Appendix E4).

Table 4.8a – Summary of pluvial fluvial options whole life present value (PV) costs (£k) 20 year appraisal period (Table 3-2, JBA pluvial fluvial options report (Appendix F1))

Cost element	Cash Costs (£k)	PV Costs (£k)	PV Costs with Optimism Bias (£k)
Do Minimum O&M	£408	£289	£289
Do Minimum total			£291
PLR Enabling	£136	£136	£150
PLR Capital	£3,378	£3,263	£3,596
PLR O&M	£84	£59	£65
PLR Total			£3,811
Combined Enabling	£246	£246	£278
Combined Capital	£4,084	£3,946	£4,455
Combined O&M	£371	£262	£295
Combined Total			£5,029

Table 4.8b – Summary of pluvial fluvial options whole life present value (PV) costs (£k) 100 year appraisal period (Table 3-3, JBA pluvial fluvial options report (Appendix F1))

Cost element	Cash Costs (£k)	PV Costs (£k)	PV Costs with Optimism Bias (£k)
Do Minimum O&M	£2,035	£588	£764
Do Minimum total			£764
PLR Enabling	£136	£136	£150
PLR Capital (reoccurs every 20 years)	£13,085	£5,576	£6,145
PLR O&M	£294	£128	£141
PLR Total			£6,437
Combined Enabling	£246	£246	£278

Cost element	Cash Costs (£k)	PV Costs (£k)	PV Costs with Optimism Bias (£k)
Combined Capital	£13,902	£6,259	£7,067
Combined O&M	£2,015	£572	£646
Total Combined scheme			£7,991

Option ranking and economic appraisal conclusion

Tables 4.9a to 4.10b summarise information presented in Sections 5.7 and 5.8 of the Pluvial/Fluvial Options Report (Appendix F1). These tables present option rankings in terms of the 20 and 100 year appraisal periods considered in addition to the impact of contributions secured against Option 6. This economic analysis assumes 100% uptake of PLR measures, sensitivity testing has been undertaken to consider a reduced take up of the measures, this is discussed in detail in section 7.3 of the Economic Appraisal Report (Appendix E4). The 100 year duration of benefits is presented here to confirm the long term economic justification for the approach, the 20 year duration of benefits has been used to inform the calculation of partnership funding contributions.

Table 4.9a – Pluvial Fluvial short list Summary of economic analysis 20-year appraisal period excluding contributions

Option	Present Value costs (£k)	Present Value damages (£k)	Present Value benefits (£k)	Average benefit: cost ratio (BCR)	Incremental benefit cost ratio (IBCR)
- Do nothing	0	31,787	-	-	-
- Do minimum – maintain	376	29,251	2,536	6.7	-
5 Property Level Resilience	3,811	17,463	14,324	3.8	3.4
6 Property Level Resilience and Community scheme at Velda Close and Aldwyck Way	4,821	17,410	14,377	3.0	0.1

Table 4.9b – Pluvial/Fluvial short list Summary of economic analysis 20-year appraisal period including contributions

Option	Present Value costs (£k)	Present Value damages (£k)	Present Value benefits (£k)	Average benefit: cost ratio (BCR)	Incremental benefit cost ratio (IBCR)
- Do nothing	0	31,787	-	-	-
- Do minimum – maintain	376	29,251	2,536	6.7	-
5 Property Level Resilience	3,811	17,463	14,324	3.8	3.4
6 Property Level Resilience and Community scheme at Velda Close and Aldwyck Way	4,601	17,410	14,377	3.1	0.1

Table 4.10a – Pluvial Fluvial short list Summary of economic analysis 100-year appraisal period excluding contributions

Option	Present Value costs (£k)	Present Value damages (£k)	Present Value benefits (£k)	Average benefit: cost ratio (BCR)	Incremental benefit cost ratio (IBCR)
- Do nothing	0	52,460	-	-	-
- Do minimum – maintain	764	47,726	4,733	6.2	-
5 Property Level Resilience	6,437	23,516	28,944	4.5	4.3
6 Property Level Resilience and Community scheme at Velda Close and Aldwyck Way	7,991	22,393	30,067	3.8	0.7

Table 4.10b – Pluvial Fluvial short list Summary of economic analysis 100-year appraisal period including contributions

Option	Present Value costs (£k)	Present Value damages (£k)	Present Value benefits (£k)	Average benefit: cost ratio (BCR)	Incremental benefit cost ratio (IBCR)
- Do nothing	0	52,460	-	-	-
- Do minimum – maintain	764	47,726	4,733	6.2	-
5 Property Level Resilience	6,437	23,516	28,944	4.5	4.3
6 Property Level Resilience and Community scheme at Velda Close and Aldwyck Way	7,771	22,393	30,067	3.9	0.8

Whilst the do minimum option has the highest benefit cost ratio it was dismissed as it does not fulfil the objectives of the scheme to mitigate flood risk in a sustainable way. The economic assessment suggests that based on the Benefit-Cost Ratio, Incremental Benefit Cost Ratio and the decision rules defined by the FCERM-AG that the economically preferred option is the PLR option alone (Option 5) as the IBCR for Option 6 is less than 1, suggesting that Option 5 should be taken forward. As the wider Velda Close defence aims to provide a 100 year defence standard, in order for this option to be preferred, and following the FCERM-AG decision rule, the IBCR ratio would need to be greater than 3. Sensitivity testing shows that if the PLR take-up is less than 90% then the IBCR for Option 6 decreases to >3. Given that PLR take-up is very unlikely to be above 90% it is recommended that Option 5 is identified as the economically preferred option.

However, when stage 5 of the decision-making process is applied, considering the factors summarised in Section 4.6, the provision of PLR and the Velda Close and Aldwyck Way community scheme (Option 6) becomes the preferred option with additional costs over Option 5 being met through additional contributions in line with the Local Choices framework.

There are uncertainties in the hydraulic modelling of the area resulting in difficulties matching the historic nature of flooding in the Velda Close area. The modelling may be underestimating the flood levels in this location and the associated flood damages and option benefits, the economic assessment of this option is considered to be conservative. The development of this option considered this uncertainty and included an allowance for uncertainty with regards to water level.

4.6. Non-financial benefits appraisal (Pluvial Fluvial)

The shortlisted options were appraised based on economic, technical, environmental and social factors and considering the feedback from key stakeholders and public consultation. To assist in the appraisal of options and assess the impacts on a number of key objectives including non-financial benefits, an Appraisal Summary Tables was produced during the Outline Business Case, these are included in Appendix F14. The key non-financial benefits that confirmed Option 6 as the preferred option under ‘Local Choices’ are:

- The option achieves the clear stated aim of the project to mitigate against flooding to the community at Velda Close via a means other than PLR (this has been attempted in the past without significant success).
- The option will also offer private contributions to the scheme from the housing association which would not be forthcoming for a PLR only option.
- The scheme provides a long-term mitigation against flood risk to this community that may not be realised using a PLR option alone.

4.7. Preferred option (Pluvial Fluvial)

The appraisal has identified Option 6 – PLR with a community scheme at Velda Close and Aldwyck Way as the preferred option for a scheme to improve the management of pluvial fluvial flood risk in Lowestoft over a 20-year duration of benefits. Table 4.10 summarises the outcome measures that are associated with the implementation of Option 6. Full details are included in the pluvial fluvial partnership funding calculator included in Appendix A2.

Table 4.10 – Pluvial/Fluvial summary of outcome measures for Option 6 - 20 year appraisal period

Contributions to applicable outcome measures	
Outcome 1 – Ratio of whole-life benefits to costs	
Present value benefits (£k)	14,337
Present value costs (whole life) (£k)	5,028
Benefit: cost ratio	2.86
Outcome 2 – Households at reduced risk	
2a – Households moved to a lower risk category (number – nr)	271
2b – Households moved from very significant or significant risk to moderate or low risk (nr)	271
2c – Proportion of households in 2b that are in the 20% most deprived areas (nr)	108
Partnership funding & FCERM-GiA	
Raw Score	44%
Adjusted Score (assuming no contributions secured)	44%
FDGIA available cells ((11) – (2))	£2,113

As the preferred option has a lower IBCR than that needed by the FCERM-AG decision rule, **the additional costs need to be funded entirely through contributions**. This is reflected in the local choices framework under the PF policy.

In-line with the partnership funding rules, the amount of FCERM-GiA that can be claimed is based on the most economically preferred option and a partnership funding calculator has been prepared for Option 5 (PLR) which is the economically preferred option, a summary of the option outcomes and conformation of the FCERM-GiA available is presented in Table 4.10b.

Table 4.10b – Pluvial/Fluvial summary of outcome measures for Option 5 - 20 year appraisal period

Contributions to applicable outcome measures	
Outcome 1 – Ratio of whole-life benefits to costs	
Present value benefits (£k)	14,324
Present value costs (whole life) (£k)	3,811
Benefit: cost ratio	3.76
Outcome 2 – Households at reduced risk	
2a – Households moved to a lower risk category (number – nr)	264
2b – Households moved from very significant or significant risk to moderate or low risk (nr)	264
2c – Proportion of households in 2b that are in the 20% most deprived areas (nr)	101
Partnership funding & FCERM-GiA	
Raw Score	57%
Adjusted Score (assuming no contributions secured)	57%
FDGIA available (£k) cells ((11) – (2))	2,140

4.8. Sensitivity analysis (Pluvial Fluvial)

As part of the technical development of the refined shortlist of options sensitivity analysis was undertaken as detailed in Section 5.8.2 of the options report this analysis focused on the sensitivity of the Kirkley Stream to blockage at bridges and culverts. This issue was considered in detail as it has been reported (Appendix F6 -

Kirkley Stream Flood Report - October 2015) that blockages along the Kirkley Stream have exacerbated historic flooding as well as for model calibration purposes.

The economic analysis considered the following sensitivity tests: to consider a number of factors where there is uncertainty surrounding the delivery of the options and are discussed in detail in Section 7 of the Economic Appraisal Note (Appendix E4):

- Inclusion of contributions to PLR by homeowners to the value of £500/property.
- A reduction in PLR effectiveness due to longer term damage.
- A reduction in the take-up of PLR.

The first two tests indicated some sensitivity of the PF score to the tests but not enough to alter the preferred option choice. The third test considered a reduction of 25% and 50% of PLR properties, this indicated that whilst a reduction in PLR take up would reduce the amount of FCERM-GiA available, this would be broadly proportionate to the cost of delivering the remaining PLR properties. As the fluvial flood wall is being delivered through partnership funding under the 'Local Choices' framework the delivery of this element is not affected by the reduction in GiA.

In addition, the partnership funding calculator includes a number of standard sensitivity tests on the following parameters as detailed in Tables 4.11a. and 4.11b for the 20 year and 100 year appraisal periods respectively.

Table 4.11a – Pluvial Fluvial preferred option OM sensitivity tests – 20 year appraisal period

PF calculator sensitivity test	Raw score	Contributions required for 100% Score (£)
Main scenario	44%	2,653,340
Sensitivity 1 - Change in PV Whole Life Cost (25% increase)	16%	5,007,800
Sensitivity 2 - Change in OM2 - 50% of households in Very Significant (Before) risk may already be in Significant Risk band	35%	3,113,300
Sensitivity 3 - Change in OM3 - 50% of households in Medium Term loss (Before) may already be in Long Term loss	44%	2,653,340
Sensitivity 4 - Increase Duration of Benefits by 25%	39%	2,890,500
Sensitivity 5 - Reduce Duration of Benefits by 25%	39%	2,893,698

Table 4.11b – Pluvial Fluvial preferred option OM sensitivity tests – 100 year appraisal period

PF calculator sensitivity test	Raw score	Contributions required for 100% Score (£)
Main scenario	56%	2,079,560
Sensitivity 1 - Change in PV Whole Life Cost (25% increase)	20%	4,722,589
Sensitivity 2 - Change in OM2 - 50% of households in Very Significant (Before) risk may already be in Significant Risk band	44%	2,643,821
Sensitivity 3 - Change in OM3 - 50% of households in Medium Term loss (Before) may already be in Long Term loss	56%	2,079,560
Sensitivity 4 - Increase Duration of Benefits by 25%	-	-
Sensitivity 5 - Reduce Duration of Benefits by 25%	54%	2,176,305

These sensitivity tests demonstrate that under both appraisal periods considered the PF score of the preferred option is sensitive to a number of the tests, in particular an increase in the whole life costs and change in number of OM2s.

5. The commercial case

5.1. Introduction and procurement strategy

The agreed approach to the procurement of services in relation to the LFRMP and delivery of the preferred options identified in this OBC is the SCAPE Procure Framework (SCAPE). SCAPE is a cost effective and OJEU compliant procurement route. As lead partner, ESC have entered into contract with Balfour Beatty as the SCAPE contractor. The SCAPE route was also endorsed by SCC who are the key partner for delivery of the pluvial fluvial aspects of the Lowestoft FRMP.

A review of all procurement routes open to the project partners was undertaken and SCAPE was selected on the basis of potential cost/programme savings combined with a commitment by the framework contractor to use local businesses and resources in the delivery of the project.

ESC have procured a number of technical services utilising the Scape Perfect Circle framework. These services include technical advisor, ECC project management, site supervision and cost management support.

Further details of the projects procurement approach is included in the LFRMP Procurement Strategy document, Appendix K1.

5.2. Key contractual terms and risk allocation

The key commercial and legal agreements that are being progressed to enable the delivery of the preferred options are summarised below:

- Landowner agreements and tripartite agreements with tenants where appropriate
- TWAO application and associated agreements
- Planning permission and associated agreements
- SCAPE risk share arrangements;
- Risk share agreements with partnership funders
- Operation and maintenance considerations

Detailed consultation with key stakeholders has established a framework for developing the legal agreements required. The approach to delivering these legal agreements is detailed in the Legal agreements briefing note (Appendix O1). Advance meetings have taken place to develop heads of terms for the legal agreements.

5.3. Procurement route and timescales

As mentioned in Section 5.1, SCAPE has been selected as the procurement route for delivering the necessary construction to deliver this project. The SCAPE agreement has regular staged check points incorporated into it to review contractual performance and ensure that best value is achieved. SCAPE does not require ESC to undertake any further procurement exercise in relation to the technical delivery of the preferred options outlined in this OBC. Subcontracts procured within the SCAPE agreement are required to go through a competitive tender process which is further detailed in Appendix K1 and defines the approach taken by the SCAPE delivery contractor for securing legally compliant, best value for money services for delivery of the project.

The project may procure further commercial support services through other available frameworks, further detail is provided within Appendix K1.

5.4. Efficiencies and commercial issues

Project efficiency is driven through the requirements of SCAPE, partner organisations and other funding sources. The project will seek to generate efficiencies at each stage to ensure best value is achieved for the public purse, Table 4.1 presents a summary of the project efficiency targets.

Table 4.1 – Summary of project efficiency requirements

Organisation / Funder	Efficiency measure / target	Reporting requirement
ESC, ESC and Scape framework	General commitment to drive efficient delivery of the project to achieve best value for the public purse.	Through general project financial reporting and benchmarking against similar projects.
EA / FCERM-GIA	15% of project expenditure to be from partnership funding	EA Partnership Funding Calculator
EA / FCERM-GIA	10% of project expenditure (of contributed amount)	EA CERT form
RFCC / Local Levy	10% of project expenditure (of contributed amount) – Assumed in line with FCERM - GiA	EA CERT form

A strategic efficiency register has been compiled using the EA's Capital Efficiency Reporting Tool (CERT) and is included as Appendix L6 (2018 OBC version) with a summary of key efficiencies identified included in Table 4.2.

Table 4.2 – Summary of FCERM (or FCERM funded) Efficiency

Efficiency Category	Efficiency Target/Idea	Forecast Value of Saving £k	Explanatory notes/ Breakdown of calculations
Innovation & Value Engineering	Shared use of Highways England's Bascule Bridge control building for the tidal barrier controls.	200	Estimate based on cost of constructing new control building.
	Alternative alignment of tidal flood wall to avoid diversion of intermediate pressure gas pipeline	150	Difference between estimated costs of tidal wall realignment and cost of diverting gas pipeline.
Contracting Approach	Delivery of preferred option using an appraise, design and build project delivery approach.	350	Estimate based on forecast cost savings against a traditional appraise, design and construct approach.
Streamlined Processes	Utilisation of Scape Procure framework to streamline project procurement and delivery.	40	£20k in 16/17, £10k in 17/18 and £10k in 18/19 based on programme reduction of approximately 6 months of Project management time.
Operational Productivity	Storage of demountable barrier components on stakeholders' land adjacent to deployment location rather than at central depot or leased land.	103	Estimate based on costs for commercial storage.

In addition, a value engineering register is now being used to record value engineering efficiencies with the current version included in Appendix L8. This identifies potential value engineering efficiencies of up to £730k. for the delivery of the tidal wall's element of the project.

A key efficiency the project is pursuing is the unconstrained delivery approach associated with the local choice tidal barrier option (Option 9LCU) whereby the reduced construction period has the potential to result in a saving of circa £10m in cash terms, in addition to the potential carbon savings associated with reduced construction period.

6. The financial case

6.1. Staged delivery

Given the need to secure additional partnership funding as a result of increases in delivery costs between SOC and OBC stages, the LFRMP is being delivered in a staged approach. The first stage has delivered the pluvial fluvial elements of the project in 2021 and is forecast to deliver the tidal flood wall works (as advanced works) by 2023. The second stage will deliver the tidal barrier element of the project. The Stage One works are fully funded and the Stage Two works are partially funded with an additional funding need of £113,089,000. The LFRMP Funding Programme (Appendix N1) outlines the approach for securing this additional funding. It is acknowledged that a risk remains that sufficient funding to enable the tidal barrier element of the works to proceed will not be secured and that the risk of not securing the required budget remains with ESC. Should this be a case, alternative options to the 'local choice' 40m barrier may need to be put forward, such as the 'nationally economically viable' option.

6.2. Financial summary

Tables 6.1a and 6.1d summarise the whole life costs of the preferred [national economic](#) options for the management of tidal and pluvial fluvial flood risk respectively. [Tables 6.1b and 6.1c summarises the whole life costs for the seasonally constrained and constrained delivery of the local choices tidal option respectively.](#) As detailed in Sections 3.5 and 3.10, detailed option costs have been developed based on a number of sources including risk allowance developed in accordance with Environment Agency risk management guidance.

Table 6.1a – Project cost summary (tidal – national economic Option 5c)

Costs (£k)	Cost for economic appraisal (PV)	Whole-life cash cost	Total project cost (approval)
Costs to OBC:	N/A -sunk costs		
Existing staff costs		65	65
Site investigation and survey		188	188
Consultants' fees		1,774	1,774
Contractors' fees		0	0
Subtotal		2,027	2,027
OBC to construction:			
Existing staff costs*			
Site investigation and survey*			
Consultants' fees*	3,277	3,277	3,277
Contractors' fees*			
Legal and stakeholder fees*			
Subtotal	3,277	3,277	3,277
Construction:			
Construction costs	42,270	46,926	46,926
Staff costs*	3,178	3,178	3,178
Consultants' fees*	3,178	3,178	3,178
Site supervision*	3,476	3,476	3,476
Inflation allowance (2.5% pa)			4,460
Subtotal	52,102	56,758	61,217
Risk contingency:			
Adjusted optimism bias barrier*	1,815	1,815	1,815
Adjusted optimism bias walls*	1,898	1,898	1,898
Risk - Monte Carlo 95%*			36,590
Risk - Monte Carlo 50%*	21,253	21,253	
Extra Inflation Risk (0% pa post commencement of construction)			0
Future costs:			
O&M & Other	12,046	54,535	
Optimism Bias (30% on future costs)	3,614	16,361	
Project total costs	96,005	157,923	106,824

*PV taken as cash cost (worst case)

Table 6.1b– Project cost summary (tidal – local choices option – 40m barrier seasonally constrained – 9LCC)

Costs(£k)	Cost for economic appraisal (PV)	Whole-life cash cost	Total project cost (approval)
Costs to OBC:	N/A -sunk costs		
Existing staff costs		65	65
Site investigation and survey		188	188
Consultants' fees		1,774	1,774
Contractors' fees		0	0
Subtotal		2,027	2,027
OBC to construction:			
Existing staff costs*			
Site investigation and survey*			
Consultants' fees*	3,277	3,277	3,277
Contractors' fees*			
Legal and stakeholder fees*			
Subtotal	3,277	3,277	3,277
Construction:			
Construction costs	73,714	85,506	85,506
Staff costs*	3,178	3,178	3,178
Consultants' fees*	3,178	3,178	3,178
Site supervision*	3,476	3,476	3,476
Inflation allowance (2.5% pa)			10,887
Subtotal	83,546	95,337	106,224
Risk contingency:			
Adjusted optimism bias barrier*	3,755	3,755	3,755
Adjusted optimism bias walls*	1,882	1,882	1,882
Risk - Monte Carlo 95%*			53,828
Risk - Monte Carlo 50%*	32,698	32,698	
Extra Inflation Risk (0% pa post commencement of construction)			0
Future costs:			
O&M & Other	12,665	59,951	
Optimism Bias (30% on future costs)	3,800	17,985	
Project total costs	141,623	216,914	170,994

*PV taken as cash cost (worst case)

Table 6.1c– Project cost summary (tidal – local choices option – 40m barrier seasonally unconstrained – 9LCU)

Costs(£k)	Cost for economic appraisal (PV)	Whole-life cash cost	Total project cost (approval)
Costs to OBC:	N/A -sunk costs		
Existing staff costs		65	65
Site investigation and survey		188	188
Consultants' fees		1,774	1,774
Contractors' fees		0	0
Subtotal		2,027	2,027
OBC to construction:			
Existing staff costs*			
Site investigation and survey*			
Consultants' fees*	3,277	3,277	3,277
Contractors' fees*			
Legal and stakeholder fees*			
Subtotal	3,277	3,277	3,277
Construction:			
Construction costs	67,216	75,570	75,570
Staff costs*	3,178	3,178	3,178
Consultants' fees*	3,178	3,178	3,178
Site supervision*	3,476	3,476	3,476
Inflation allowance (2.5% pa)			7,511
Subtotal	77,048	85,401	92,913
Risk contingency:			
Adjusted optimism bias barrier*	3,258	3,258	3,258
Adjusted optimism bias walls*	1,882	1,882	1,882
Risk - Monte Carlo 95%*			53,828
Risk - Monte Carlo 50%*	32,698	32,698	
Extra Inflation Risk (0% pa post commencement of construction)			0
Future costs:			
O&M & Other	13,307	60,394	
Optimism Bias (30% on future costs)	3,992	18,118	
Project total costs	135,462	207,056	157,185

*PV taken as cash cost (worst case)

Table 6.1d – Project cost summary (pluvial fluvial - 2018 values)

Costs (£k)	Cost for economic appraisal (PV)	Whole-life cash cost	Total project cost (approval)
Costs to OBC:	N/a -sunk costs		Exc previous app
Existing staff costs		£6	£6
Consultants' fees		£18	£18
Contractors' fees		£0	£0
Subtotal		£24	£24
OBC to construction:			
Existing staff costs	£5	£8	£8
Consultants' fees	£246	£246	£246
Contractors' fees	£4	£4	£4
Subtotal	£255	£258	£258
Construction:			
Construction costs	£3,438	£3,568	£3,568
Inflation allowance			£151
Existing staff costs	£15	£16	£16
Consultants' fees	£270	£280	£280
Site supervision	£223	£232	£232
Subtotal	£3,946	£4,095	£4,246
Risk contingency:			
Risk MEV & Optimism Bias	£541	£559	£559
Future costs:	£0	£0	
Maintenance & future costs	£262	£371	
Optimism Bias (on future costs)	£33	£47	
Project total costs	£5,037	£5,354	£5,087

6.3. Funding sources

The LFRMP Funding Programme (Appendix N1) sets out the planned approach to ensure sufficient funding is available for delivering the project objectives. Multiple funding sources have been explored in the production of this comprehensive plan with multiple sources already secured. The programme clearly sets out the secured funding for the first stage of works and provides further detail on the approach taken to secure the additional funding required to deliver the second stage of works.

ESC will be responsible for the operation and maintenance of the tidal elements of the LFRMP and will make provision for undertaking these future activities with a defined funding allocation, in addition to seeking beneficiary contributions. ESC has committed to underwriting these O&M costs, this will be confirmed in a letter from ESC's Section 151 Officer (Appendix N3).

Table 6.2 summarises the key funding sources that will be used to progress the initial capital work elements of the projects and indicates the status of this funding (secured or allocated).

Table 6.2 Summary of project funding sources (Source: Funding timetable, Section 4.5, V16 – LFRMP funding strategy)

Annualised funding needs (£k)	Pre 21-22 (sunk)	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	Total
Stage 1 – Tidal Walls										
New Anglia Local Enterprise Partnership (LEP)	10,000	-	-	-	-	-	-	-	-	10,000
East Suffolk Council	-	-	-	-	-	-	-	-	-	-
Green Recovery Fund	-	7,795	-	-	-	-	-	-	-	7,795
OGD Funding	-	-	1,400	-	-	-	-	-	-	1,400
COVID impacts funding	-	1,198	-	-	-	-	-	-	-	1,198
Stage 1 Tidal Walls - Identified funding	10,000	8,993	1,400	-	-	-	-	-	-	20,393
Partnership Funding Required	-	-	-	-	-	-	-	-	-	-
Stage 1 Tidal Walls- Total funding	10,000	8,993	1,400	-	-	-	-	-	-	20,393
Stage 1 – Pluvial Fluvial										
FCERM-GIA	1,492	-	-	-	-	-	-	-	-	1,492
Suffolk County Council (SCC)	3,000	-	-	-	-	-	-	-	-	3,000
Local Levy via RFCC	1,751	-	-	-	-	-	-	-	-	1,751
COVID impacts funding	385	-	-	-	-	-	-	-	-	385
Stage 1 Pluvial fluvial - Identified funding	6,628	-	-	-	-	-	-	-	-	6,628
Partnership Funding Required	-	-	-	-	-	-	-	-	-	-
Stage 1 Pluvial Fluvial - Total funding	6,628	-	-	-	-	-	-	-	-	6,628
Stage 2 – Tidal Barrier										
FCERM-GIA	-	-	-	-	-	4,186	-	-	-	4,186
Local Levy via RFCC	-	-	1,589	-	-	-	-	-	-	1,589
East Suffolk Council	-	-	250	250	250	250	-	-	-	1,000
Suffolk County Council (SCC)	-	-	-	-	-	-	-	-	-	-
Department for Education	-	-	-	-	-	-	200	-	-	200
Green Recovery Fund	-	2,500	656	2,266	28,494	1,775	-	-	-	35,691
Stage 2 Tidal Barrier - Identified funding	-	2,500	2,495	2,516	28,744	6,211	200	-	-	42,666
Partnership Funding Required	-	-	-	-	-	22,974	29,437	30,101	30,577	113,089
Stage 2 Tidal Barrier - Total funding	-	2,500	2,495	2,516	28,744	29,185	29,637	30,101	30,577	155,755

On the 2nd February 2016, £10m partnership funding contribution from the NALEP was secured for the management of tidal flood risk to promote growth in Lowestoft.

In addition in [July 2020](#), [£43.5m](#) of additional funding was secured from the HMG Green Recovery Fund towards the management of tidal flood risk in Lowestoft.

The funding programme provides further detail on the approach taken to secure the remaining funding required, identifying a number of additional funding sources that are being actively explored.

The funding requirements set out in Table 6.2 are correct at the time of initial submission of the [OBC \(October 2022 or October 2017 for pluvial fluvial works\)](#). Please note that the extract from the funding strategy above includes an allowance for construction costs associated with the Hamilton Road flood wall which is excluded from economic assessment included within this OBC. The construction costs for this flood wall were funded through the New Anglia LEP to provide flood risk reduction to the PowerPark enterprise zone with benefits attributed economic growth in the LEP business case (Appendix N2). Whilst the construction of the Hamilton Road flood wall falls within the scope of the LFRMP it has been removed from the FCERM economic assessment due to a disproportionate impact of the benefit cost ratio of all options. The limited FCRM benefits associated with this flood wall are separate and distinct from the FCERM benefits associated with the remainder of the tidal walls and barrier, it was therefore considered appropriate to remove this from the economic assessment.

6.4. Impact on revenue and balance sheet

The funding programme has considered in detail the whole life funding requirements of implementing the tidal and pluvial fluvial preferred options and demonstrates the approach to ensuring sufficient funding is available for both the initial capital and operational and maintenance phases of the project.

The tidal defence element of the project will create an FCERM asset in the ownership of ESC, who as asset owner and a Coast Protection Authority will be responsible for the whole life operation and maintenance of the tidal scheme.

The PLR measures installed as part of the pluvial fluvial preferred option will become assets of the property owners who will be responsible for their maintenance. This arrangement will be formalised in a legal agreement with the PLR beneficiary, the agreement will not restrict the property owner to apply for a grant (if available) in the future and will only be in force for the life span of the product (20 years). Therefore, the installation of PLR measures will not result in any additional cost to the promoting organisations beyond the initial capital expenditure. The Velda Close fluvial wall works and associated pumping station will be an FCERM asset owned by SCC as lead local flood Authority. Operation and maintenance costs associated with the wall will be funded by SCC through asset maintenance budgets. The pumping station may

be adopted by Anglian Water in which case they will be responsible for its operation and maintenance and the associated costs, otherwise operation and maintenance will remain the responsibility of SCC.

6.5. Overall affordability

Table 6.3a presents the tidal elements whole life cash costs for both stages of the tidal elements of the LFRMP (Post OBC). It should be noted that a small element of the future O&M costs associated with completion of the tidal walls, forecast for late 2023 is not currently shown in the table.

6.3a FCRM - Annualised spend profile – Tidal (£k Cash)

Annualised spend profile (£k cash)	Sunk	Yr 0	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7 +	Yr 8 +	Total
	Pre 21-22	22 - 23	23 - 24	24 - 25	25 - 26	26 - 27	27 - 28	28 - 29	29-30	30-31	
Stage 1 - Tidal Walls											
Authority staff costs - Stage 1	2,027	1,374									3,401
External fees - Stage 1											0
Construction costs - Stage 1 Tidal Walls		10,413									10,413
Risk contingency (95%ile) - Stage 1		458									458
Optimism Bias - Stage 1		1,882									1,882
Inflation - Stage 1		0									0
Stage 1 Subtotal	2,027	14,127	0	0	0	0	0	0	0	0	16,154
Stage 2 - Tidal Barrier											
Authority staff costs - Stage 2	1,639		397	397	397	397	397	397	397		4,419
External fees - Stage 2 (including TWA0)			1,217	1,217	977	977	977	977	977	977	
Construction costs - Stage 2 Tidal Barrier					15,018	15,018	15,018	15,018	15,018		75,092
Risk contingency (95%ile) - Stage 2		847	847	847	10,166	10,166	10,166	10,166	10,166		53,371
Optimism Bias - Stage 2					751	751	751	751	751		3,755
Inflation - Stage 2		0	20	40	1,260	1,702	2,154	2,618	3,093		10,887
Stage 2 subtotal	0	2,486	2,481	2,501	28,570	29,011	29,463	29,927	30,402	0	154,840
Stage 1&2 sub total	2,027	16,613	2,481	2,501	28,570	29,011	29,463	29,927	30,402	0	170,995
O & M and Future Costs											
O&M and other future costs										59,951	59,951
Optimism Bias - future works										17,985	17,985
Future costs sub total	0	0	0	0	0	0	0	0	0	77,937	77,937
Total costs	2,027	16,613	2,481	2,501	28,570	29,011	29,463	29,927	30,402	77,937	248,932

Table 6.3b presents whole life cash costs for the pluvial fluvial elements of the LFRMP (as per 2018 OBC).

6.3b FCRM - Annualised spend profile – Pluvial Fluvial (£k Cash – 2018 values)

Annualised spend profile (£k cash)	Sunk	Yr 0	Yr 1	Yr 2+	Total
	Pre 18-19	18 - 19	19 - 20	2020 +	
Authority staff costs	6	9	9		24
External fees - Stage 1	18	372	372		761
Construction costs - Stage 1		714	2,854		3,568
Risk contingency (MEV + Optimism bias) - Stage 1		112	447		559
Inflation - Stage 1			151		151
Project Total Stage 1 sub total	24	1,206	3,833	0	5,063
O&M and other future costs				371	371
Optimism Bias - future works				47	47
Total costs	24	1,206	3,833	418	5,481

Considering the staged approach to delivery of the initial capital works, Table 6.4 presents the capital expenditure profile (Cash costs) required to deliver the LFRMP tidal Local choice option (40m barrier – seasonally constrained). The costs below include the 95%ile QRA value, additional optimism bias allowance and a 2.5% PA inflation allowance on construction costs, as defined in Section 3.

Table 6.4– Project initial capital spend profile (Cash – tidal only)

Cash Cost (£k) (inc risk+inflation)	Sunk	Yr 0	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Total
	Pre 21-22	22 - 23	23 - 24	24 - 25	25 - 26	26 - 27	27 - 28	28 -29	29 - 30	
Stage 1 - Tidal walls	2,027	11,787								13,814
Stage 1 - Risk	0	2,340								2,340
Stage 1 - Inflation	0	0								0
Stage 2 - tidal barrier	0	1,639	1,614	1,614	16,392	16,392	16,392	16,392	16,392	86,827
Stage 2 - Risk	0	847	847	847	10,917	10,917	10,917	10,917	10,917	57,126
Stage 2 - Inflation	0	0	20	40	1,260	1,702	2,154	2,618	3,093	10,887
Total	2,027	16,613	2,481	2,501	28,570	29,011	29,463	29,927	30,402	170,995

The Funding Programme (Appendix N1) focuses on providing sufficient funding for the initial capital costs but also sets out the approach for securing funding for the operation and maintenance of the tidal flood defence measures.

Comparison of the forecast initial capital spend for the tidal works (Table 6.4) against the currently identified funding sources (Table 6.2) indicates a total funding gap of approximately £113,089,000 to enable delivery of Stage Two of the project. The preferred Local Choice option has been developed to a higher level of detail than is usual for the OBC stage, with detailed design completed for the tidal flood walls and progressing for the 40m tidal barrier combined with a high level of consultation with key stakeholders directly impacted by the proposals to ensure greater certainty of delivery cost and risks, with the greatest certainty for Stage One of the project.

Robust risk management approaches have been applied compliant with Defra risk management guidance to ensure sufficient budget is available to deliver the project.

Appendix N1 section 4.3 of the Funding Programme provides an overview of the main sources of committed and secured funding that will be used to deliver the Stage One works. Section 6.4 of the programme outline the approach taken to secure additional contributions to enable the delivery of the Stage Two works (Tidal Barrier). The additional sources of funding being explored are as follows:

- Secure additional contributions from current core funders
- Secure private beneficiary contributions: land owners; built asset owners
- commercial tenants
- Secure developer contributions (direct / indirect)
- Monetise contributions in-kind
- Multi-departmental asks for Central Government funding.

A number of these approaches have been successful and others have been discounted as they either require significant capital borrowing that is beyond the scope of a District Authority or will not raise the required level of funding (even in aggregate) at the at the pace it is required.

As the vast majority of the benefit relates to the economic value and jobs the project will unlock to benefit the region and nation, the remaining funding sources are the focus:

- Multi-departmental asks for Central Government funding.
- Secure additional contributions from current core funders

Even at the level of costs required to deliver the 40m 'local choice' tidal barrier, the return on this investment to the nation and will help secure Lowestoft Port as a key hub for offshore renewable energy projects for decades.

7. The management case

7.1. Project management

The development of this OBC is being led by ESC as a Maritime Authority with responsibilities under the Coast Protection Act 1949 and their permissive powers under Section 14A of the Land Drainage Act (1991) as amended by the Flood & Water Management Act (2010). Support on the fluvial and pluvial elements of the project will be provided by SCC as Lead Local Flood Authority under the Flood and Water Management Act 2010. A dedicated project team was established to take the lead in delivery of the Lowestoft FRMP and is developing and using project control processes following the PRINCE2 project management methodology and in accordance with ESC project and financial control processes.

Project structure and governance

ESC are supported by a number of partners and specialist suppliers in the delivery of this project. The project is supported by four key groups:

- Project Board
- Strategic Steering Group
- Project Delivery Group
- Key Stakeholder Group

The Project Board is responsible for making formal decisions and includes Cabinet Members from both SCC and ESC, plus representatives from AW, ABP, NALEP and the EA. The Project Board is supported by the Strategic Steering Group and the Project Delivery Board.

A Key Stakeholder Group provides local knowledge and input to guide and shape the project and how we engage with the wider community and businesses. This group's membership has been drawn from volunteers at the February 2016 business engagement event and subsequent public consultation. This approach has been adopted as good practice as demonstrated in the communications and engagement process for the G2LS.

A project organogram has been prepared to illustrate the structure of the project team and the key project governance routes and is included in Appendix D7.

Project roles and responsibilities

Key roles and responsibilities of individuals and organisations involved in the delivery of the Lowestoft FRMP are presented in Table 7.1.

Table 7.1 Key Project roles and responsibilities

Role	Name	Responsibility, Organisation
Project Sponsor & Project Board Chair	Cllr David Ritchie	ESC Cabinet Member for Planning and Coastal Management and SCC Councillor.
Project Executive	Karen Thomas	Head of Coastal Management, Coastal Partnership East on behalf of East Suffolk Council
Project Manager	Tamzen Pope	Coastal Engineering and Operations Manager, Coastal Partnership East on behalf of East Suffolk Council
Assistant Project Manager – Pluvial Fluvial	Nicola China	LLFA FCRM Advisor – Suffolk, Environment Agency, on behalf of Suffolk County Council
Principal Designer	Troy Doherty	Defined role under CDM 2015 regulations, Balfour Beatty
EA representative	Will Todd	Partnership and Strategic Overview team FCRM Advisor – Suffolk, Environment Agency
Suffolk County Council representative	Matt Hullis	Head of Environment Strategy, Suffolk County Council

Role	Name	Responsibility, Organisation
Lead Contractor	Balfour Beatty	SCAPE framework contractor leading the development of the Lowestoft FRMP
Lead Consultant	Jacobs – Tidal	Lead sub consultant developing the tidal flood risk management options and producing the Lowestoft FRMP
Consultant	JBA – Fluvial/ Pluvial	Sub-consultant considering pluvial fluvial flood risk.
Ground Investigation Contractor	Tetrattech	Undertaking initial ground investigation along the alignment of the likely preferred tidal option (Option 5).

Project plan

Detailed project programmes have been prepared to accompany this OBC and are included in Appendix J1 to J3 which have informed the economic appraisal of the barrier options considered. Appendix J4 is the projects master programme that takes into account an accelerated TWAO process with a seasonally constrained delivery approach. Table 7.2a summarises the delivery key milestones (including those completed) from the Master Delivery programme (appendix J4) for delivery of the local choice 40m barrier option with an unconstrained delivery approach.

Table 7.2a – Key project Milestones for the Tidal works (seasonally constrained) (Actuals in Bold)

Activity	Date (DD/MM/YY)	Comment
SOC recommended for approved	04/05/17	By LPRG and submitted to ESC & SCC cabinets for information
Approval to proceed to OBC & TWAO	06/06/17	By ESC Cabinet
Tidal walls planning application submitted	10/07/19	By ESC to ESC Planning department
2018 OBC recommended for technical approval (tidal)	11/01/19	By LPRG followed by ESC cabinets
Tidal walls planning application granted	06/05/20	By ESC Planning department
TWAO - Issue draft Order to DEFRA	09/05/23	By ESC to DEFRA
TWAO - Order made	07/06/24	Assumes written representations only
Tidal works		
Tidal walls work to start on site	08/04/21	Tidal wall construction commences in advance of tidal barrier, subject to planning permission
Tidal walls work substantially completed by	11/07/23	Excluding barrier tie in works
Tidal barrier work to start on site	01/07/24	Subject to TWAO
Tidal barrier work completed	31/03/27	Assumes 40m barrier –unconstrained construction approach

Table 7.2b summarises the key delivery milestones (including those completed) from the Master Delivery programme (Appendix J4) for delivery of the local choice 40m barrier option amended to take into account the delivery efficiency associated with a constrained delivery approach.

Table 7.2b – Key project Milestones for the Tidal works (unconstrained) (Actuals in Bold)

Activity	Date (DD/MM/YY)	Comment
SOC recommended for approved	04/05/17	By LPRG and submitted to ESC & SCC cabinets for information
Approval to proceed to OBC & TWAO	06/06/17	By ESC Cabinet
Tidal walls planning application submitted	10/07/19	By ESC to ESC Planning department
2018 OBC recommended for technical approval (tidal)	11/01/19	By LPRG followed by ESC cabinets
Tidal walls planning application granted	06/05/20	By ESC Planning department
TWAO - Issue draft Order to DEFRA	09/05/23	By ESC to DEFRA
TWAO - Order made	07/06/24	Assumes written representations only

Activity	Date (DD/MM/YY)	Comment
Tidal works		
Tidal walls work to start on site	08/04/21	Tidal wall construction commences in advance of tidal barrier, subject to planning permission
Tidal walls work substantially completed by	11/07/23	Excluding barrier tie in works
Tidal barrier work to start on site	01/07/24	Subject to TWAO
Tidal barrier work completed	01/11/29	Assumes 40m barrier – seasonally constrained construction approach

7.2. Communications and stakeholder engagement

The approach to communications and engagement across all project communications and engagement has been, and will continue to be, a two-way symmetrical approach (systems theory), allowing for the development of ideas and the co-creation of progress. This approach has been adopted to support the project development through each phase and to raise awareness of, and to help support, the early identification and resolution of objections and concerns.

From the outset, the project team identified that a successful communication approach and accompanying strategy were of paramount importance in delivering the objectives of the LFRMP. A comprehensive structure of communication and stakeholder engagement has been adopted and continually developed. A detailed summary of the stakeholder engagement undertaken to date is included as part of the Lowestoft Tidal Communications Plan (Appendix G1). To ensure the smooth delivery of this project, ensuring that both external and internal communications are undertaken in an efficient and effective manner, extensive consultation and engagement has, and will continue to be, undertaken.

Communications and engagement planning, and delivery has and will continue to broadly follow the Environment Agency's 'Working with Others' guidelines centred around the 'Engage, Deliberate and Decide' approach but with additional evaluation points. All engagement is planned, conducted, and delivered in accordance with the Chartered Institute of Public Relations (CIPR) Code of Conduct, specifically adhering to the guidance around ethical communication. As required by East Suffolk Council, an Equality Impact Assessment has been completed.

It is noteworthy that during the pandemic consultation and engagement was of course challenging. However, digital and virtual reality engagement played a critical role in engaging people. Virtual reality rooms, using gaming technology has proved successful and we will continue to enhance and develop these tools for use throughout the project. Value-based digital surveys have proved exceptionally useful tools in other areas of work and again we will continue to develop and use those tools during project engagement as is appropriate.

- Consultation and engagement have been achieved through a number of mechanisms, including but not limited to:
- Public drop-in sessions,
- Stakeholder workshops,
- Involvement in and attendance at key local events
- Public and statutory consultations on options and environmental assessments,
- Use of the LFRMP project's web site¹⁷,
- Use of social and traditional media

¹⁷ <http://www.lowestoftfrmp.org.uk/>

- Extensive engagement with schools, and FE colleges
- Engagement with local business groups (including the Lowestoft Chamber of Commerce),
- The Strategic Stakeholder Group and Key Stakeholder Group,
- Focused meetings with individuals and organisations as required.
- Public consultation documents (Appendix G2)
- Virtual reality visitor centre
- Virtual reality careers centre
- Awareness raising through social value activities such as local volunteering

For all methods of consultation, mechanisms are in place to capture and analyse consultation responses and incorporate this feedback into the development of the options. Further detail is included in Appendix G1.

The key stakeholders consulted through the development of the Lowestoft FRMP are summarised in Table 7.3. A more extensive analysis and stakeholder list is included in the communications and engagement plan (Appendix G1).

Table 7.3 - Key Project stakeholders (excluding project partner organisations)

Stakeholder	Interest (tidal/pluvial/fluvial)	Represented on / Consulted through
Royal Yacht Association, Royal Norfolk and Suffolk Yacht Club and leisure users	tidal	Public and focused consultation
Broads Authority	tidal	Statutory consultation
Businesses and their customers	tidal/pluvial/fluvial	Focused consultation
Highways England	tidal/pluvial/fluvial	Statutory consultation
Associated British Ports	tidal	Focused consultation – represented on project Board and steering group
UK Power Networks	tidal/pluvial/fluvial	Focused consultation
Landowners (potentially affected by the tidal works inc walls)	tidal/pluvial/fluvial	Focused and Public consultation Some represented on project steering group
Historic England	tidal/pluvial/fluvial	Statutory consultation
Environmental bodies	tidal/pluvial/fluvial	Statutory consultation
Network Rail	tidal	Statutory consultation
The Crown Estate	tidal	Statutory consultation
General public	tidal/pluvial/fluvial	Public consultation

The in-house engagement specialists overseeing and supporting the project's communication and engagement, including that of the contractor Balfour Beatty, are all either working towards or hold a CIPR qualification. The project's strategic communications lead is a Chartered PR Practitioner.

7.3. Change management

Any organisational change required as a result of the delivery of the preferred options will be managed in accordance with the project governance procedures. Where organisational change is required with partner organisations and or other interested parties, legal agreements will be put in place to formalise this change and clearly establish responsibilities.

These organisational changes and agreements will be the main focus of the operation and maintenance of the assets created by the project together with any third party operation and access agreements. Further detail of the O&M requirements for the tidal barrier and the approach to implementing legal agreements is included in Appendix O1 and F18 respectively.

7.4. Benefits realisation

Monitoring and reporting on benefits realisation will be undertaken by ESC in collaboration with the EA and utilise the EA's established FCERM protocols. Tables 7.4a and 7.4b summarise the forecast realisation of Tidal OM's for the Option 9 Local choice options, considering constrained and unconstrained delivery approaches. Please note that this is based on the master delivery programme which assumes an accelerated TWA0 process (Appendix J4). The benefits realisation presented below is more optimistic than that included in the economic analysis which is based on the detailed project programmes (Appendix J1 to J3).

Table 7.4a Forecast OM2 realisation plan – Tidal Option 9LCC (constrained delivery)

Ref	Outcome Measure (OM)	Yr 1 2023	Yr 2 2024	Yr 3 2025	Yr 4 2026	Yr 5 2027	Yr 6 2028	Yr 7 2029	Total
rOM2A	Number of households better protected against flood risk (today)							226	226
rOM2A .b	Number of households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands							126	126
rOM2A .c	Number of households moved out of the 'very significant', 'significant' or 'intermediate' flood risk bands to lower risk bands in the 20% most deprived areas							125	125
rOM2A .PLP	Number of households moved from the 'very significant', 'significant' or 'intermediate flood risk bands to lower flood risk bands through PLP measures							-	-
rOM2B	Additional households better protected against flood risk in 2040 (adaptation)							42	42
rOM2B .b	Additional households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands in 2040 (adaptation)							-	-
rOM2B .c	Number of households moved out of the 'very significant', 'significant' or 'intermediate' flood risk bands to lower risk bands in 2040 in the 20% most deprived areas (adaptation)							-	-
rOM2. NRP	Number of non-residential properties better protected against flood risk							152	152
rOM2A .NRP	Number of non-residential properties better protected from flood risk (today)							137	137
rOM2B .NRP	Number of non-residential properties better protected from flood risk in 2040							15	15

Table 7.4b Forecast OM2 realisation plan – Tidal Option 9LCC (un constrained delivery)

Ref	Outcome Measure (OM)	Yr 1 2023	Yr 2 2024	Yr 3 2025	Yr 4 2026	Yr 5 2027	Yr 6 2028	Yr 7 2029	Total
rOM2A	Number of households better protected against flood risk (today)					226			226
rOM2A .b	Number of households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands					126			126
rOM2A .c	Number of households moved out of the 'very significant', 'significant' or 'intermediate' flood risk bands to lower risk bands in the 20% most deprived areas					125			125
rOM2A .PLP	Number of households moved from the 'very significant', 'significant' or 'intermediate flood risk bands to lower flood risk bands through PLP measures					-		-	-
rOM2B	Additional households better protected against flood risk in 2040 (adaptation)					42			42
rOM2B .b	Additional households moved from the 'very significant', 'significant' or 'intermediate' flood risk bands to lower flood risk bands in 2040 (adaptation)					-		-	-
rOM2B .c	Number of households moved out of the 'very significant', 'significant' or 'intermediate' flood risk bands to lower risk bands in 2040 in the 20% most deprived areas (adaptation)					-		-	-
rOM2. NRP	Number of non-residential properties better protected against flood risk					152			152
rOM2A .NRP	Number of non-residential properties better protected from flood risk (today)					137			137
rOM2B .NRP	Number of non-residential properties better protected from flood risk in 2040					15			15

Tables 7.4a and 7.4 b illustrate the impact of an unconstrained delivery approach has on the forecast realisation of benefits with a reduction of almost 2 years in the time to deliver the tidal benefits.

The realisation of Pluvial Fluvial OMs is based on the properties protected by the Velda Close flood wall and a PLR take-up rate of 100%. Further detail can be found in the Pluvial Fluvial Options Report (Appendix F1).

Table 7.5 Forecast OM2 realisation plan – Pluvial fluvial (2018 values)

Outcome Measure (OM)	Yr 1 2017	Yr 2 2018	Yr 3 2019	Yr 4 2020	Yr 5+ 2021	Total
OM2a Households moved to a lower risk category (number- nr)			264	7		271
OM2b Households moved from very significant or significant risk to moderate or low (nr)			264	7		271
OM2c Proportion of households in 2b that are in the 20% most deprived areas (nr)			101	7		108

*Old OM2 references as these were Forecast to be delivered in the previous CSR period.

Whilst every effort has been made to identify areas of environmental enhancement that can be economically delivered within the LFRMP, it has not been possible to identify areas where sufficient quantities of habitat or river restoration could be undertaken to enable an Outcome Measure claim to be made. These OMs together with OM3 for coastal erosion have therefore been omitted from the benefits realisation plan tables.

7.5. Risk management

Project level risk

Up to the point of agreeing the Target Cost for individual work packages, the risk of overspend remains with ESC although the SCAPE framework KPI places emphasis on the Contractor to help manage this as part of the overall scheme budget and pass the KPI. Once the Target Cost is agreed the Compensation Event and the pain/gain contractual mechanisms define who the risk of overspend rests with.

Risk management of the project will follow the procedure established through the SCAPE framework combined with ESC's own internal risk management processes, further detail of the risk management structure is included in Appendix L7.

The SCAPE framework mandates the ECC NEC3 for delivery agreements and so provides a basis for the division of risk to each of the project parties. Additional risks have been recorded on the project risk register. The risk owner is the party best placed to manage the risk from a commercial, programme or delivery basis. This would be agreed by the project team once a risk had been identified. The quantitative risk registers for the 40m Tidal barrier and tidal walls represent the comprehensive project risk assessment for delivering the tidal Works (Appendix L). Key project risks summarised in Table 7.6.

Table 7.6 Key project risks

	Key Risks	Risk VH/H/M /L/VL	Owner	Mitigation	Risk Post mitigation VH/H/M/L/ VL
1	TWAO application / Legal agreements – Objections to the TWAO / contents of required legal agreements may delay the tidal barrier.	H	ESC	Extensive consultation with impacted parties is being and will continue to be undertaken prior to submission of the applications and during the development of legal agreements.	M
2	Unforeseen ground conditions – Extensive GI has been completed to inform the design and construction of the tidal flood walls with initial GI undertaken for the tidal barrier.	H	ESC	Further GI at barrier location will be undertaken to confirm design assumptions, risk allowance is included for a level of risk relating to ground conditions.	M
3	Funding – high level of additional partnership funding required to progress Stage 2 of project (tidal barrier).	VH	ESC	Funding programme in place – plan in place to source additional funding and provide regular formal updates to funders and stakeholders. Staged approach to delivery, risk of not completing second stage of tidal project	H
4	Inability to agree land access with key stakeholders	M	ESC	Include requirements as part of early consultation / development of legal agreements. Progress heads of terms and continue with TWAO development.	L
5	Delays in discharging TWAO consent conditions	L	ESC	Ensure conditions are included in programme and scope of works. Early liaison with stakeholders to reduce the risk of unknown conditions.	VL
6	Inflation – current levels of inflation result in increased delivery costs.	VH	ESC	Monitor inflationary pressures – work with supply chain to deliver efficiency. Include an allowance for a reasonable level of inflation as risk. Consider recommendations of Environment Agency guidance on managing cost uncertainty.	H

Option delivery risk management

Risk workshops were initially undertaken in March 2017 and February 2018 to develop and refine the option specific quantitative risk registers for the preferred Tidal Barrier, Tidal Walls and Pluvial Fluvial options. For the tidal options, continued development of these risk registers has taken place with the latest risk workshops completed in February and March 2023. The most recent versions of the quantitative risk registers are included as Appendix L2, L3 and L4. These risk registers were used to inform the development of risk allowances included within the option costs. In line with current Environment Agency risk management guidance and assessment of residual option risks was also undertaken and an element of Optimism Bias identified and included in the option costs.

The quantitative risk registers will be reviewed and refined by the project team at regular intervals through the duration of the project. This will ensure that risk budgets reflect the projects current stage with consideration given to risks that have been realised or have passed so that the project governance and funders are kept informed. Further detail of this approach is detailed in Appendix L7.

7.6. Contract management

Contractual commitments will be made in accordance with ESC's procurement processes and those of the SCAPE framework contractor. Day to day contractual management will be undertaken by ESC's Project Manager supported by the project management and project governance structures detailed in Section 6.1. In addition to

enable the management of the Scape contract as it moves into its delivery phase, ESC will formally appoint the following roles:

- ECC Project Manager
- Technical reviewer
- ECC site supervisor
- Project Cost Manager

ESC will continually monitor the level of commercial support needed to deliver the projects and where necessary bring in additional support as required.

7.7. Assurance

Project assurance is acknowledged as being critical to the successful and efficient delivery of the project. The Project Board is accountable for overall assurance of the project and report directly to ESC's elected members and SCC's elected members.

Day to day assurance is undertaken by the project team in line with the quality assurance processes of their respective organisations together with the overarching requirements of the project delivery plan.

Multiple funding streams will be required to deliver the preferred options, each of which have specific assurance requirements associated with the release of funding. The Lowestoft FRMP Funding Programme¹⁸, included in Appendix N1 contains details of assurance processes that will be followed for each funding stream.

Assurance of this OBC will be undertaken through the EA's LPRG following review and recommendation of the Project Board to proceed with document submission. Following a recommendation by LPRG to approve the OBC, the document will be submitted to the ESC and SCC Cabinets for information.

Once the complete funding package for the second stage of delivery (Tidal Barrier – Local choice option) is secured the OBC will be resubmitted to LPRG for financial assurance. Following a recommendation for approval of the second stage works, it will be resubmitted to the ESC cabinet for information and for approval to further progress activities associated with the tidal barrier element of the preferred tidal option.

7.8. Post project evaluation

A post project evaluation will be undertaken in line with ESC's project management procedures. In addition, any additional requirements from the projects funders requirements for post project evaluation will be incorporated into the evaluation, a summary of these requirements is presented in Table 7.7.

¹⁸ Lowestoft FRMS Funding Programme, ESC, 2017

Table 7.7 Post project evaluation requirements

	Source	Measure	Target
1	ESC	Tidal elements of the FRMP	
		Budget – complete the works within the Approval value	OBC stage cost estimates
		Programme – complete works within the programme at FBC stage	OBC stage completion milestone
2	FCRM-GiA	Tidal OM2's delivered	OBC stage PF calculator
		Pluvial Fluvial OM2's delivered	OBC stage PF calculator
3	Local Levy	As FCRM-GiA	
4	SCAPE framework	Socio economic Benefits (demonstrated using SVP or LM £ socio economic calculator)	To be defined in the final scape delivery contract.
		Commercial value for money (report produced referring back to initial costings)	
		Post Project Review and Learning Workshop with Client. (Carried out with <i>whole</i> team).	
		KPI post construction MAP survey carried out with the client	
		KPI supply chain Surveys completed	
5	NALEP	No specific requirements	N/A
6	Green Recovery Fund	No specific requirements	N/A

In addition to these funding specific requirements, the Lowestoft Infrastructure prospectus established an overriding measure of success for the LFRMP which is as follows:

“The threat from fluvial and tidal flooding in Lowestoft will have been significantly reduced”

The Local plan for Lowestoft also specifically mentions the provision of Strategic flood risk management measures as a key enabler for the future growth of Lowestoft.

The exact criteria for this measure of success is to be quantified against success in achieving the objectives of this strategy. *With the completion of the pluvial fluvial elements of the project, this objective has been partially met.*

7.9. Contingency plans

At present Lowestoft has no formal tidal or pluvial fluvial flood defences. Existing contingency arrangements will remain in place and include:

- Tidal flood warning service
- Suffolk Flood Plan
- Evacuation plans
- Emergency Services' response plans
- Local authority response plans

Some local businesses have their own contingency arrangements, in particular ABP which has a published flood contingency plan¹⁹ detailing how the port will respond to a tidal flood event.

¹⁹ ABP Lowestoft Flood contingency Plan, ABP, 2014 available from: http://www.abports.co.uk/Marine/Short_Sea_Ports/Lowestoft/Lowestoft_Flood_Contingency_Plan

The Lowestoft FRMP Funding Programme (Appendix N1) considers contingencies in relation to funding shortfalls and cost increases as far as possible at this stage of the project. As a living document, the funding programme will further develop as increased certainty is gained with respect to tidal barrier option costs.

Lowestoft temporary tidal defences

As an interim measure 1.4km of temporary tidal flood defences have been procured to reduce the risk of flooding to key sections of Lowestoft. The temporary defence system has been in place since December 2016 and it is intended to be available for use for a period of up to five years until the permanent tidal defences are completed. After this time the asset will be released to the Environment Agency. It was successfully deployed in January 2017 in response to a forecast surge event, further detail is given in Section 2.5.

As part of the two-stage delivery approach for the tidal element of the LFRMP the temporary defences will be utilised to reduce the risk of flooding during the period between completion of the tidal walls and tidal barrier elements of the tidal preferred option.

Although undesirable, consideration could be given to extending the use of this system should there be a delay in completion of either stage of the permanent tidal defences. However, this would not be in line with the objectives of this project.

Appendix A: Partnership funding calculators

- A1 Tidal preferred option partnership funding calculator (National Economic option)
- A2-1 Pluvial fluvial preferred option partnership funding calculator – 20 year Appraisal Period (2018 OBC version)
- A2-3 Pluvial fluvial preferred option partnership funding calculator – 100 year Appraisal Period (2018 OBC version)

Appendix B: List of reports produced

NB: It should be noted that during the time frame of this this OBC development. Waveny District Council (WDC) has become East Suffolk Council (ESC). Any referenced to WDC should be taken as referring to ESC.

Report Title	Description	Risk Focus	Date
Tidal Modelling reports	Initial Lowestoft tidal hydraulic modelling report, supplemented by additional studies focusing on the outer harbour.	Tidal	2014 & 2016
Economics Report	Summary of economic analysis undertaken	Tidal	2016
Option summary note	Note produced to support consultation of the SEA Environment Report prior to the finalisation of the SOC	Tidal	2017
Local economic impact report	Report considering the impact of tidal flooding on Lowestoft's economy - GVA	Tidal	2016
Lowestoft Tidal Barrier Feasibility Study	Study considering the feasibility of using a tidal barrier as part of a tidal defence system to protect Lowestoft.	Tidal	2015
Pluvial/Fluvial options report	Report summarising the appraisal of pluvial fluvial flood risk management options.	Pluvial/fluvial	2016/2017
Pluvial/Fluvial Economic analysis summary note	Summary note to support the pluvial fluvial GIS economic analysis outputs.	Pluvial/fluvial	2016
Integrated Catchment Modelling Report	Report on the integrated catchment modelling undertaken as part of the assessment of pluvial fluvial flood risk	Pluvial/fluvial	2016/2017
Lowestoft Integrated Modelling Report	Report summarising the pluvial fluvial modelling work and sensitivity work undertaken.	Pluvial/fluvial	2016/2017
Lowestoft FRMP procurement Cabinet briefing note	East Suffolk Councils Cabinet briefing document detailing the recommended approach for procuring work relating to the Lowestoft FRMP. NB: Confidential document	All	2015/2016
Lowestoft FRMP Funding Programme	Summary of funding sources for the Lowestoft FRMP, detailing funding status and plan for obtaining further funding as required.	All	2016
Strategic Approach document	Document produced to clearly establish interaction of Lowestoft FRMP with other local plans and strategies. Establishing any overlap between FCERM risk and the approach of fairly apportioning benefits.	All	2017
WFD Assessment	Water Framework Directive Assessment for tidal and pluvial/fluvial options	All	2016
HRA	Habitats Regulations Assessment for tidal and pluvial/fluvial options	All	2016
SEA Environment Reports	Strategic Environmental Assessment Report – summarises the assessment of environmental impacts of options considered.	All	2016 & 2017
Public consultation document	Document produced for public consultation of tidal and pluvial fluvial options	All	2016 – 2022 (living document)
Communication plan	Lowestoft FRMP – Project communications plan	All	2016 – 2022 (living document)

Appendix C: Photographs

- C1 Tidal – Option 5 alignment walkthrough
- C2 Historic Flooding Photographs
- C3 Aerial Photographs
- C4 Artists impression – Tidal Option 5 (28m tidal barrier width)
- C5 Tidal - Option 5 flood walls works in progress
- C6 Completed pluvial fluvial works

Appendix D: Figures

- D1 Constraints plan
- D2 Tidal Shortlisted Option Plans
- D3 Tidal Option 5 – Detailed design GA's and sections
- D4 Pluvial Fluvial Shortlisted Option Sketches
- D5 Tidal Flood Extents
- D6 Pluvial Fluvial Flood Extents
- D7 Project Organogram
- D8 Key Plan
- D9 40m tidal barrier 15% GA's and sections – to follow in future OBC submission

Appendix E: Economic Appraisal

- E1 Tidal Economic Appraisal Note
 - DEFRA Summary sheet
 - PV damages summary sheet – Main tidal area
 - Option costing summary spreadsheets
- E2 Tidal options costing note and spreadsheets
- E3 Tidal options technical descriptions note
- E4 Pluvial Fluvial economic appraisal note

Appendix F: Technical Reports

- F1 Pluvial Fluvial Options Note
- F2 Lowestoft tidal Barrier feasibility study
- F3 Lowestoft Local Economic Impact report
- F4 Lowestoft Infrastructure Prospectus
- F5 Tidal modelling reports
- F6 Kirkley stream flooding reports
- F7 Dec 13 surge reports
- F8 Enterprise zone
- F9 Broads Climate change high level review
- F10 SMP's
- F11 Anglian FRMP 2015
- F12 Suffolk FRMS 2016
- F13 Lowestoft Local Plan
- F14 Tidal Appraisal Summary Sheet
- F15 Pluvial Fluvial Appraisal Summary Sheet
- F16 Lowestoft SFRA
- F17 Lowestoft Tidal flood walls FRA
- F18 Tidal Barrier O&M requirements
- F19 Lowestoft Drainage Strategy - Pluvial / Fluvial Options Report (SOC stage)
- F20 [Tidal Barrier – Technical review note](#)
- F21 [Option 3 - Flood Walls Only - Technical and Cost Review for OBC \(2018\)](#)
- F22 [CFB and UKCIP change comparison technical note](#)
- F23 [Navigation Simulation Report](#)
- F24 [East Suffolk CFMP](#)

Appendix G: Consultation

- G1 Communications and Engagement Plan
- G2 Lowestoft FRMP Public Consultation Documents
- G3 Action Plan and Communications Log List (Action Plan - Lowestoft 12_08_22)

Appendix H: Environmental Reports

- H1 PEIR and appendices
- H2 HRA Screening report and response (OBC)
- H3 HRA Screening report and response (SOC)
- H4 WFD assessment (SOC)
- H5 WFD assessment (OBC)

Appendix I: Natural England Letter of Support

I1 Natural England letter of support

Appendix J: Project Programme

- J1 Lowestoft FRMP 28m Tidal barrier Programme
- J2 Lowestoft FRMP 40m Tidal barrier (seasonally constrained delivery) Programme
- J3 Lowestoft FRMP 40m Tidal barrier (un-constrained delivery) Programme
- J4 Lowestoft FRMP 40m Tidal barrier Master delivery (seasonally constrained) Programme

Appendix K: Procurement Strategy

K1 LFRMP Procurement Strategy

Appendix L: Risk & Efficiency Registers

- L1 Project risk register – superseded by L2 and L3
- L2 Tidal Walls Option 5 quantitative register
- L3a 28m Tidal Barrier Option 5 quantitative register
- L3b 40m Tidal Barrier Option 5 quantitative register
- L4 Pluvial fluvial preferred option quantitative register – Removed as works delivered
- L5 Tidal Optimism Bias Assessment
- L6 Project efficiency register 2018 version
- L7 LFRMP approach to risk and cost management
- L8 Tidal walls value engineering register – Live version

Appendix M: Strategic Approach

M1 Strategic Approach document

Appendix N: Funding Programme & NALEP Business Case

- N1 CONFIDENTIAL DRAFT - Lowestoft FRMP - Funding Programme
- N2 CONFIDENTIAL DRAFT - Lowestoft FRMP - NALEP Business Case
- N3 Tidal O&M Commitment Letter – To follow in final revision of OBC

Appendix O: Licences, Consents and Legal agreements

- O1 Legal Agreements Briefing Note
- O2 TWAO Briefing note

Appendix P: Carbon Optioneering Tool

P Tidal barrier carbon assessment technical note and carbon assessment tools

Sport

Image: Stephen Waller
 Agenda Item 13
 ES/1742



Blues set for Millers scrap

'Thanks to Coffee Caravan family'



Page 3

'Families turn to shoplifting'

Cost of living crisis fueling crime rise



Shoplifting from Suffolk stores has soared amid the cost of living crisis, it has been claimed.

Official figures show there was an 18% increase in thefts from stores between June 2022 and June 2023, with Mike

DOMINIC BAREHAM
 dominic.bareham@newsquest.co.uk

Smith, *left*, of Stowmarket Foodbank, believing there was a "direct correlation" with the cost of living crisis for many families.

He said: "Does the cost of living crisis encourage people to steal? Of course it does. Nobody steals when they have got lots of money in their pocket."

Full story: Pages 8-9

Win this two-night getaway



Page 22

AMAZING

Autumn

SALE

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OTHER

EAST SUFFOLK COUNCIL

LOCAL GOVERNMENT ACT 1972

PROPOSED APPLICATION FOR THE LOWESTOFT TIDAL BARRIER ORDER

NOTICE CALLING THE SECOND MEETING OF THE COUNCIL TO APPROVE THE SUBMISSION OF A TRANSPORT AND WORKS ACT ORDER

IN ACCORDANCE with the provisions of Section 239 of the Local Government Act 1992, as applied by section 20 of the Transport and Works Act 1992, **NOTICE IS HEREBY GIVEN** that a meeting of East Suffolk Council ("the Council") will be held at Riverside, 4 Canning Road, Lowestoft, NR33 0EQ on Wednesday 22 November 2023 at 6.30pm for the purpose of taking into consideration and determining upon the expediency of confirming the resolution for the promotion by the Council of an application for the Lowestoft Tidal Barrier Order which was submitted to the Secretary of State for Environment, Food and Rural Affairs under the Transport and Works Act 1992 on 12 October 2023 in accordance with the resolution of the Council passed at a meeting held on Wednesday 15 March 2023.

20 October 2023

Philip Ridley
Head of Planning and Coastal Management

Goods Vehicle Operator's Licence

RSC Logistics Ltd of 17 Devon Road, Felixstowe, IP11 9AF is applying to change an existing licence as follows: To keep an extra 1 goods vehicle and 1 trailer at the operating centre at London Road, Capel St Mary, Ipswich, IP9 2JT. Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hillcrest House, 386 Harehills Lane, Leeds, LS9 6NF, stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A Guide to Making Representations is available from the Traffic Commissioner's office.

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PLANNING

PUBLIC NOTICE

West Suffolk Council

Town and Country Planning (Development Management Procedure) (England) Order 2015 Planning (Listed Building and Conservation Areas) ACT 1990 Town and Country Planning (General Permitted Development)(Amendment) Order

Advert types: **EIA**-Applications accompanied by an environmental statement; **DP**-Not in accordance with the Development Plan; **PROW**-Affecting a public right of way; **M**-Major development; **LB**-Works to a Listed Building; **CLB**-Within the curtilage of a Listed Building; **SLB**-Affecting the setting of a Listed Building; **LBDC**-Listed Building discharge conditions; **C**-Affecting a Conservation Area; **TPO**-Affecting trees protected by a Tree Preservation Order; **LA**- Local Authority Application; **LC**-listed building in a conservation area; **CULBA**-curtilage of a listed building and conservation area; **PA**-Prior notification application; **PIP**-permission in principle

Notice is given that **West Suffolk Council** have received the following application(s):

PLANNING AND OTHER APPLICATIONS:

1.	DC/23/1617/FUL - Planning application - change of use of barn F from offices to holiday let, Dwelling Village Farm, The Street (CLB)
2.	DC/23/1619/LB - Application for listed building consent - replacement render to front elevation, 42 College Street Bury St Edmunds, Suffolk (LC)
3.	DC/23/1620/LB - Application for listed building consent - alterations to internal layout, Dwelling Village Farm, The Street (CLB)
4.	DC/23/1654/FUL - Planning application - change of use of 9 bed dwelling house (C3) to a holiday let (sui generis), Green Lane House Green Lane, Ixworth Thorpe (PROW)

HOUSEHOLDER APPLICATIONS:

In the event of an appeal against refusal of planning permission for householder applications, which is dealt with on the basis of written representations, any representations made will be sent to the Secretary of State and there will be no further opportunity to comment at the appeal stage.

1.	DC/23/1499/HH - Householder planning application - a. double garage to front and side b. two storey extension to front, sides and rear to provide first floor living accommodation c. single storey side extension attached to garage d. alteration to existing roof line to include six dormer windows e. air source heat pump in front garden f. ground mounted 9.5kw solar array consisting of 20 solar panels, Oak Ridge Mill Road, Great Barton (TPO)
2.	DC/23/1567/HH - Householder planning application - a. infill of door to form window on ground floor north elevation b. single storey side extension c. addition of two roof lights d. alterations to windows and doors of south elevation, Millars Cottage Mill Lane, Hopton (PROW)
3.	DC/23/1680/HH - Householder planning application - a. single storey front extension incorporating alterations to garage b. single and two storey rear extensions c. replacement render d. replacement and alterations to windows e. replace chimney stack (following removal of existing) f. reduce two chimney stacks g. juliet balcony to rear dormer, Barkway House 18 Bury Road, Newmarket (C)
4.	DC/23/1681/HH - Householder planning application - a. part two storey and part single storey side extension (following demolition of existing garage) b. single storey rear extension c. all existing external brickwork to be finished with smooth render, 41 Beaumont Court Haverhill, Suffolk (PROW)

West Suffolk Council, West Suffolk House, Western Way, Bury St. Edmunds IP33 3YU

The applications and associated documentation can be viewed via Public Access on our website <https://planning.westsuffolk.gov.uk/online-applications/>. Representations should be submitted within of 21 days, please allow extra day(s) if a bank holiday occurs within the 21 day consultation period of the date of this notice by using the online comment form on our website, by e-mail to technical@westsuffolk.gov.uk or by post to - Planning & Growth, West Suffolk House, Western Way, Bury St. Edmunds IP33 3YU.

Representations received will be published on our website where they will be available for public inspection and copying and will be used in connection with any procedure associated with the determination of the application including an appeal.

20 October 2023

Julie Baird, Director (Planning & Growth)

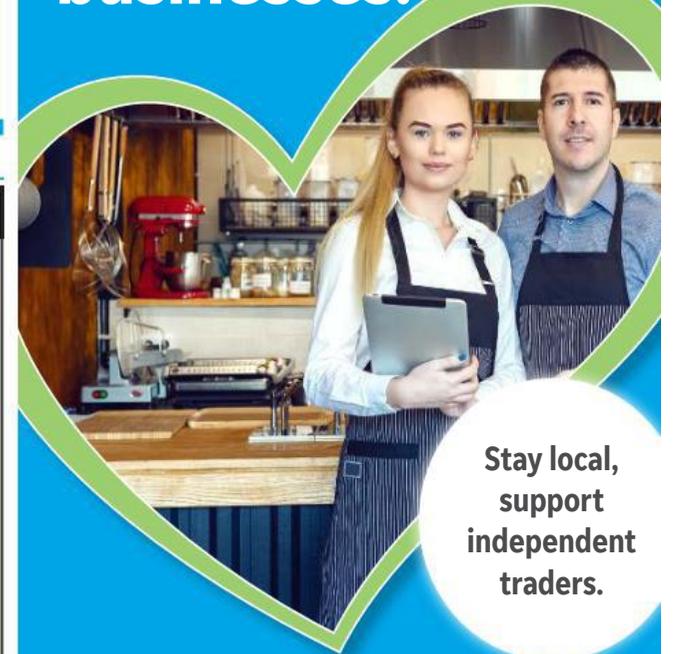
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Agenda Item 13

ES/1742

Farke on his return



PROPERTY, LIFESTYLE, INTERIORS
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Sport



Perfect storm

Fury as village loses sea defence funding... on eve of latest onslaught

As coastal communities brace for the impact of Storm Babet, Norfolk's most exposed village has been told it will receive no further government funding for sea defences.

Officials have said that Hemsby will not qualify for more support because there are too few homes at risk.

It means that a proposed £15m, 0.8-mile rock 'berm' designed to protect the village will not now go ahead and locals have been told that they face the immediate prospect of losing their properties to the sea.

Five threatened homes had to

JAMES WEEDS
james.weeds@newsquest.co.uk

be demolished earlier this year, while 6ft of sandy cliff was lost just last weekend.

Ian Brennan, who lives in Hemsby, said the mood was "an equal mix of despondency and anger".

"We're going to be abandoned," he added.

The news comes with coastal areas on high alert amid warnings of easterly winds of up to 50mph from today.

Full story: Pages 8-9

Image: MIKE PAGE

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OTHER

NORFOLK COUNTY COUNCIL (COSTESSEY AND NORWICH, VARIOUS ROADS) PROPOSED TRAFFIC ORDERS, FOOTWAY CONVERSION, PRIORITY CROSSING AND ROAD HUMPS NOTICE 2023

The Norfolk County Council propose to make the following Orders under the Road Traffic Regulation Act 1984, the effects of which will be as follows:

Norfolk County Council (Norwich and Costessey, A1074 Dereham Road) (Bus and Cycle Lane/ Gate) Order 2023

The effect of this Order would be to: (i) create a bus, taxi and cycle lane to be in operation 24 hours a day, 7 days a week, along the lengths of the A1074 Dereham Road as set out in the Schedule 1 below; (ii) create a bus and cycle lane to be in operation 24 hours a day, 7 days a week, along the lengths of the A1074 Dereham Road as set out in the Schedule 2 below and (iii) create a bus and cycle gate to be in operation 24 hours a day, 7 days a week, along the lengths of the A1074 Dereham Road as set out in the Schedule 3 below;

SCHEDULE 1

Bus, Taxi and Cycle Lane – 24 Hour

A1074 Dereham Road North side (Eastbound)	From a point 71m east of the centreline of its junction with U78236 Breckland Road to a point 52m west of its junction with U78268 Gurney Road
---	--

SCHEDULE 2

Bus and Cycle Lane – 24 Hour

A1074 Dereham Road South Side (Westbound)	From a point 63m east of its junction with U78236 Breckland Road eastwards for a distance of 160m
---	---

SCHEDULE 3

Bus and Cycle Gate – 24 Hour

Road:	Section:
U78264/12 Old Dereham Road/Three Mile Lane – (Eastbound and Westbound)	From its junction with A1074 Dereham Road to a point 4m west of centre line of U78264/16 Three Mile Lane
U78489 Dereham Road (Eastbound and Westbound)	From a point 45m east of its junction with U78236 Breckland Road south-eastwards to its junction with A1074 Dereham Road

Norfolk County Council (Costessey, U78489 Dereham Road) (Prohibition of Waiting) Amendment Order 2023

The Norfolk County Council propose to make an Order under the Road Traffic Regulation Act 1984, the effect of which on vehicles will be to prohibit waiting at any time along the length of road specified below.

The Norfolk County Council (Costessey, Various Roads) (Prohibition of Waiting) Variation and Consolidation Order 2011 is amended by the addition of the length of U78489 Dereham Road (South side) from a point 83 m east of its junction with U78236 Breckland Road at the east end of the cul-de-sac for a distance of 14m.

Copies of the draft Orders, a plan and Statement of Reasons for making the Orders may be viewed online at <https://norfolk.citizenspace.com/>. Copies may also be available for inspection at Norfolk County Council, County Hall, Norwich and at the offices of South Norfolk District Council, The Horizon Centre, Peachman Way, Broadland Business Park, Norwich NR7 0WF, during normal office hours or via transport@norfolk.gov.uk. However, in-house staffing levels have been reduced and viewing online would be recommended. Any objections and representations relating to the Orders must be made in writing and must specify the grounds on which they are made. All correspondence for these proposals must be received at the office of nplaw, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH, marked for the attention of Ms A L Wilton by 14th November 2023. They may also be emailed to trafficorders@norfolk.gov.uk.

The Norfolk County Council (Norwich and Costessey, A1074 and U78489 Dereham Road) Footway Conversion Notice 2023

(1) The Norfolk County Council is proposing to convert lengths of existing combined cycleway/footway using powers under Section 66(4) and Section 65(1) of the Highways Act 1980 to a segregated cycleway and footway at the following locations:-

- (i) A1074 Dereham Road North side: from its junction with U71068 Grays Fair to a point 35m west of its junction with U78264 Three Mile Lane;
- (ii) U78489 Dereham Road North side: from a point 12m east of its junction with U78264 Three Mile Lane to a point 13m west of its junction with U78236 Breckland Road; and
- (iii) U78489 Dereham Road North side: from a point 24m east of its junction with U78236 Breckland Road eastwards for a distance of 46m;

The conversion will consist of removing the existing footway and constructing a separate cycle track and footway with a total width of 4 to 5m. Pedestrians and cyclists will have joint use and will be segregated.

(2) The Norfolk County Council is proposing to convert lengths of existing footway using powers under Section 66(4) and Section 65(1) of the Highways Act 1980 to a shared use (unsegregated) cycleway and footway at the following locations:-

- (i) 78264 Old Dereham Road/Three Mile Lane (North side) – from a point 35m west of the centre line of its junction with U78264/16 Three Mile Lane to a point 12m east of its junction with U78264/16 Three Mile Lane;
- (ii) U78489 Dereham Road (North side) – from a point 13m west of the centre line of its junction with U78236 Breckland Road to a point 24m east of the centre line of its junction with U78236 Breckland Road; and
- (iii) A1074 Dereham Road (North side) – from a point 4m west of the centre line of its junction with U78268 Gurney Road for 59m westwards.

The conversion will consist of widening the existing footway and constructing a shared use cyclepath/footpath. The reason for the unsegregated cyclepath/footpath proposal is to provide a more direct route and safer environment for pedestrians and cyclists. However due to site constraints a full segregation cannot be provided.

The Norfolk County Council (Costessey) Road Humps Notice 2023

As required under the Highways (Road Humps) Regulations 1999 and Section 90(A), (C) and (D) of the Highways Act 1980, notice is hereby given that Norfolk County Council propose to install flat topped speed tables at the following locations:-

- (i) U78264 Three Mile Lane – From a point 1.4m north of centre line of its junction with U78264 (Old) Dereham Road for a distance of 8m northwards;
- (ii) U78236 Breckland Road – From the give way line of its junction with the U78489 Dereham Road for 8m northwards;
- (iii) U78489 Dereham Road – From a point 16m east of the centre line of its junction with U78236 Breckland Road for a distance of 8m eastwards;
- (iv) Residential Service Road situated south of No. 184 Dereham Road – From the give way line of its junction with the A1074 Dereham Road for 6m northwards; and
- (v) U78268 Gurney Road – From the give way line of its junction with the A1074 Dereham Road for 7m northwards.

The speed tables will cross the full width of the carriageway including 1m of ramps on their longer sides at a height of not more than 75mm. The reason for the speed table proposals is to provide a safer environment for pedestrians and cyclists within an urbanised area.

The Norfolk County Council (Costessey),

Priority Cycle and Pedestrian Crossing Notice 2023

As required under the Road Traffic Regulation Act 1984, Sections 23 and 25, notice is hereby given that the Norfolk County Council propose to install priority cycle and pedestrian crossings at the following locations:-

- (i) U78264 Three Mile Lane – From a point 1.4m north of the centre line of its junction with U78264 (Old) Dereham Road northwards for a distance of 8m;
- (ii) U78236 Breckland Road – From its junction with U78489 (Old) Dereham Road northwards for a distance of 8m;
- (iii) U78264 Dereham Road – From a point 16m east of the centre line of its junction with U78236 Breckland Road eastwards for a distance of 8m;

- (iv) Residential Service Road situated south of No. 184 Dereham Road – From its junction with A1074 Dereham Road northwards for a distance of 6m; and
- (v) U78268 Gurney Road – From its junction with A1074 Dereham Road northwards for a distance of 7m.

Distances are measured to the south edge of the hump. The reason for the priority crossing proposal is to provide a safer environment for pedestrians and cyclists within an urbanised area.

The Norfolk County Council (Costessey and Norwich, A1074 Dereham Road) Signalled Pedestrian Crossing Notice 2023

As required under the Road Traffic Regulation Act 1984, Sections 23 and 25, notice is hereby given that the Norfolk County Council propose to install a priority cycle and pedestrian crossing at the following location:-

- A1074 Dereham Road – From a point 142m east of the A1074 Dereham Road/ U45027 Wendene roundabout junction eastwards for a distance of 16.5m

The reason for the signalled crossing proposal is to provide a safer environment for pedestrians within an urbanised area.

The Norfolk County Council (Costessey)

Bus Stop Clearway Notice 2023

NOTICE is hereby given that Norfolk County Council propose to introduce bus stop clearways as defined in Schedule 7, Part 3 of the Traffic Signs Regulations and General Directions 2016, which will introduce a No Waiting at Any Time restriction for any vehicles, except buses at the following locations in the Town of Costessey:-

- U78236 Breckland Road (West side) – From a point 38m north of its junction with U78489 Dereham Road northwards for a distance of 17m;
- U78236 Breckland Road (East side) – From a point 53m north of its junction with U78489 Dereham Road northwards for a distance of 17m;
- U78489 Dereham Road (North side) – From a point 28m east of its junction with U78236 Dereham Road eastwards for a distance of 23m; and
- U78489 Dereham Road (South side) – From a point 21m east of the junction with U78236 Dereham Road eastwards for a distance of 17m

The bus stop clearways conform to new regulations and will ensure unhindered access for bus services.

A copy of the plans for these proposals can be viewed online at <https://norfolk.citizenspace.com/>. They may also be inspected during normal opening hours at Norfolk County Council, County Hall, Martineau Lane, Norwich or via transport@norfolk.gov.uk, or at the offices of South Norfolk District Council at The Horizon Centre, Peachman Way, Broadland Business Park, Norwich NR7 0WF. However, in office staffing levels have been reduced and viewing online would be recommended.

Any person who wishes to comment on these proposals should write to nplaw, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH, marked for the attention of Ms A L Wilton by no later than 14th November 2023. They may also be emailed to trafficorders@norfolk.gov.uk. The team dealing with these proposals can be contacted by email at transport@norfolk.gov.uk or by telephone on 0344 800 8020.

DATED this 20th day of October 2023

Katrina Hulatt, Director of Legal Services (NPLaw), County Hall, Martineau Lane, Norwich NR1 2DH

Note: Information you send to the Council will be used for any purpose connected with this scheme and will be held as long as reasonably necessary for those purposes. It may also be released to others in response to freedom of information requests.

OTHER

THE NORFOLK COUNTY COUNCIL (CLENCHWARTON, SMALLHOLDINGS ROAD, RECTORY DRIVE AND ST MARGARETS MEADOW) (PROHIBITION OF WAITING, LOADING AND UNLOADING) ORDER 2023

The Norfolk County Council has made an Order under the Road Traffic Regulation Act 1984, on 16th October 2023, which comes into operation on 24th October 2023. The effect of which on vehicles will be to prohibit waiting, loading and unloading during the times and lengths of road specified in the Schedule below. A copy of the Order, plan, and a Statement of Reasons for making the Order may be viewed online at <https://norfolk.citizenspace.com/>. Copies may also be available for inspection at Norfolk County Council, County Hall, Norwich and at the offices of King's Lynn & West Norfolk Borough Council, King's Court, Chapel St, King's Lynn PE30 1EX.

The Officer dealing with public enquiries concerning these proposals Alexandra Copeman telephone 01553 778019 or 0344 800 8020.

SCHEDULE – In the Parish of Clenchwarton

Prohibition of Waiting, Loading and Unloading – Monday to Friday 08.00-09.30 and 14.00-16.00

- C80 Main Road (Southern side) – From its junction with U21059 Smallholdings Road for 10 metres westwards and 10 metres eastwards
- U23047 Rectory Drive (Eastern & Western sides) – From its junction with U21059 Smallholdings Road for 10 metres eastwards
- U21059 Smallholdings Road (Eastern side) – From its junction with C80 Main Road for 74 metres southwards
- U21059 Smallholdings Road (Western side) – From its junction with C80 Main Road for 147 metres southwards
- U23046 St Margarets Meadow (Eastern & Western sides) – From its junction with U21059 Smallholdings Road for 10 metres westwards

DATED this 20th day of October 2023

Katrina Hulatt, Director of Legal Services (nplaw) and Monitoring Officer County Hall, Martineau Lane, Norwich, NR1 2DH

Note: Information you send to the Council will be used for any purpose connected with the making or confirming of this Order and will be held as long as reasonably necessary for those purposes. It may also be released to others in response to freedom of information requests.

THE NORFOLK COUNTY COUNCIL (SOUTH-WESTERN CONTROLLED PARKING ZONE EXTENSION) (U42444 WALPOLE STREET) AMENDMENT TRAFFIC REGULATION ORDER 2023

The Norfolk County Council propose to make the above Order under the Road Traffic Regulation Act 1984, the effects of which will be to amend The Norwich City Council (Controlled Parking Zone) (South-western Controlled Parking Zone) Traffic Regulation Order 1996 (as amended) to introduce lengths of double yellow line (No waiting at any time) restrictions on Walpole Street as follows:-

- East Side
From a point 6 metres southeast of the south-eastern building line of Nos. 18-40 Walpole Gardens southeastwards for a distance of 8 metres.

West Side
From a point 6 metres southeast of a point opposite the south-eastern building line of Nos. 18-40 Walpole Gardens southeastwards for a distance of 11 metres. A copy of the draft Order, plan and a Statement of Reasons for making the Order may be viewed online at <https://norfolk.citizenspace.com/>. They may also be inspected during normal opening hours at Norfolk County Council, County Hall, Martineau Lane, Norwich or via transport@norfolk.gov.uk. However, in-house staffing levels may have been reduced and viewing online would be recommended.

Any objections and representations relating to the Order must be made in writing and must specify the grounds on which they are made. All correspondence for these proposals must be received at the office of nplaw, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH, marked for the attention of Ms A L Wilton by 14th November 2023. They may also be emailed to trafficorders@norfolk.gov.uk.

The Officer dealing with public enquiries concerning these proposals is Caroline McGlynn telephone 01603 223496 or 0344 800 8020

DATED this 20th day of October 2023

Katrina Hulatt, Director of Legal Services (nplaw), County Hall, Martineau Lane, Norwich, NR1 2DH

Note: Information you send to the Council will be used for any purpose connected with the making or confirming of this Order and will be held as long as reasonably necessary for those purposes. It may also be released to others in response to freedom of information requests.

ROAD TRAFFIC REGULATION ACT 1984: SECTION 14 TEMPORARY CLOSURE OF PART OF THE U3018 SLUGS LANE, SOMERLEYTON

Suffolk County Council intends to make an order closing the U3018 Slugs Lane, Somerleyton from the junction with Marsh Lane to the junction with Brickfields to facilitate the installation of a new telegraph pole. Other co-ordinated works may also take place during this period.

Access will be open for pedestrians and cyclists. The diversion route will be The Street, the B1074, Slugs Lane and vice versa.

It is intended that the closure will operate from 01/11/2023 - 03/11/2023 but, if necessary, the order may remain in force for 18 months (or longer if extended by the Minister). Enquiries should be made to Hawthorndon Developments Ltd. Tel: (01953) 660721

Date: 20/10/2023
Nigel Inness, Head of Governance, Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX

OTHER

NOTICE OF MAKING OF AN ORDER SECTION 53 OF THE WILDLIFE AND COUNTRYSIDE ACT 1981 NORFOLK COUNTY COUNCIL (BODHAM AND HIGH KELLING) MODIFICATION ORDER 2022

The above Order, made on 30 August 2023, if confirmed as made, will modify the Definitive Map and Statement for the area by adding a public footpath in the parishes of High Kelling and Bodham from the A148 Cromer Road at grid reference TG 1078 3991 and proceeding in a south south-westerly direction for approximately 396 metres where the path meets Bodham Footpath No. 1 at grid reference TG 1072 3954.

A copy of the order and order map may be seen free of charge at County Hall, Martineau Lane, Norwich and at the offices of North Norfolk District Council, Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN, during normal office hours or purchased at a cost of £5.00 from the undersigned or requested free of charge from legalordersandregisters@norfolk.gov.uk.

Any representation or objection relating to the order must be sent in writing to the Senior Legal Orders Officer, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2SG or legalordersandregisters@norfolk.gov.uk not later than 1 December 2023, and applicants are requested to state the grounds on which it is made.

If no such representations or objections are duly made to the order, or if any so made are withdrawn, the Norfolk County Council, instead of submitting the order to the Secretary of State may itself confirm the Order.

If the Order is submitted to the Secretary of State for the Environment, Food and Rural Affairs any representations or objections which have been duly made and not withdrawn will be sent with it.

The person dealing with public enquiries concerning this Order is Mr I Sharman, telephone no. (01603) 222902.

Dated this 20th day of October 2023
Katrina Hulatt, Director of Legal Services, Norfolk County Council, County Hall, Martineau Lane, Norwich NR1 2DH

NOTICE OF MAKING OF AN ORDER SECTION 53 OF THE WILDLIFE AND COUNTRYSIDE ACT 1981 NORFOLK COUNTY COUNCIL (CLEY – WYMERHILL) MODIFICATION ORDER 2022

The above Order, made on 12 October 2022, if confirmed as made, will modify the Definitive Map and Statement for the area by upgrading Cley-next-the-Sea Footpath No. 20 to a restricted byway commencing at the C306 Holt Road at grid reference TG 0536 4289 and proceeds in a generally southerly direction for approximately 300 metres to meet the C307 Bridgefoot Lane at grid reference TG 0534 4259.

A copy of the order and order map may be seen free of charge at County Hall, Martineau Lane, Norwich and at the offices of North Norfolk District Council, Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN, during normal office hours or purchased at a cost of £5.00 from the undersigned or available electronically free of charge from legalordersandregisters@norfolk.gov.uk.

Any representation or objection relating to the order must be sent in writing to the Senior Legal Orders Officer, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2SG not later than 1 December 2023, and applicants are requested to state the grounds on which it is made.

If no such representations or objections are duly made to the order, or if any so made are withdrawn, the Norfolk County Council, instead of submitting the order to the Secretary of State may itself confirm the Order.

If the Order is submitted to the Secretary of State for the Environment, Food and Rural Affairs any representations or objections which have been duly made and not withdrawn will be sent with it.

The person dealing with public enquiries concerning this Order is Mr I Sharman, telephone no. (01603) 222902.

Dated this 20th day of October 2023
Katrina Hulatt, Director of Legal Services, Norfolk County Council, County Hall, Martineau Lane, Norwich NR1 2DH

EAST SUFFOLK COUNCIL

LOCAL GOVERNMENT ACT 1972

PROPOSED APPLICATION FOR THE LOWESTOFT TIDAL BARRIER ORDER

NOTICE CALLING THE SECOND MEETING OF THE COUNCIL TO APPROVE THE SUBMISSION OF A TRANSPORT AND WORKS ACT ORDER

IN ACCORDANCE with the provisions of Section 239 of the Local Government Act 1992, as applied by section 20 of the Transport and Works Act 1992, NOTICE IS HEREBY GIVEN that a meeting of East Suffolk Council ("the Council") will be held at Riverside, 4 Canning Road, Lowestoft, NR33 0EQ on Wednesday 22 November 2023 at 6.30pm for the purpose of taking into consideration and determining upon the expediency of confirming the resolution for the promotion by the Council of an application for the Lowestoft Tidal Barrier Order which was submitted to the Secretary of State for Environment, Food and Rural Affairs under the Transport and Works Act 1992 on 12 October 2023 in accordance with the resolution of the Council passed at a meeting held on Wednesday 15 March 2023.

20 October 2023

Philip Ridley

Head of Planning and Coastal Management



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OTHER

JULIAN AUGUSTUS PRYER Deceased
Pursuant to the Trustee Act 1925 anyone having a claim against or an interest in the Estate of the deceased, late of 52 Station Road, Lingwood, Norwich, Norfolk, NR13 4AZ, who died on 14/08/2023, must send written particulars to the address below by 21/12/2023, after which date the Estate will be distributed having regard only to claims and interests notified.
Jordan Rodwell c/o Fosters Solicitors, William House, 19 Bank Place, Norwich, NR2 4FS.
Ref: JGR/SPRY018-1

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Agenda Item 13

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ES/1742
**'Amnesia'
accident
conduct
hearing**

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'Get your 5G mast off my land at once'

Homeowner blockades grass verge in row



A Kirkley man has blockaded workmen from installing a mobile phone mast in a row over land rights.

Michael Garman, 69, leapt into action to prevent the mast being put on a patch of land outside his house on the corner of Carlton Road and Kirkley Park Road that he says he owns.

On Tuesday, Mr Garman first sat on a deckchair and later parked his car and mobile home

DANIEL HICKEY
daniel.hickey@newsquest.co.uk

on the grass verge to stop the workers from installing the mast.

In March, East Suffolk Council gave permission to Signal Infrastructure Limited to install a 15m mast on the site to provide 3G, 4G and 5G to the area.

Full story: Page 2



PAGE 12

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18 (18) Honda Jazz SE i-Vtec 1.3, metallic grey, **ONLY 13,100 MILES**, 1-owner, FSH, sat nav, cruise, aircon, DAB, alloys, as new£11,995

13 (13) Honda CRV SE, 2 litre, i-Vtec, red, **ONLY 54,000 MILES**, FSH, alloys, aircon, reversing camera, parking sensors, bluetooth, outstanding£9,995

18 (18) Fiat 500 Lounge 1.2, red, **ONLY 16,000 MILES**, cruise control, alloys, aircon, glass sunroof, £20 road tax, e/windows, parking sensors, low insurance and running costs, outstanding£9,695

16 (66) Hyundai i20 SE T-GDi 1.0, 5 door, white, **JUST 48,700 MILES**, fsh, alloys, cruise, electric windows, zero road tax, bluetooth, low insurance and running costs, superb£8,595

18 (68) Dacia Sandero Essential SCE 1.0, metallic grey, **ONLY 10,000 MILES**, fsh, aircon, e/windows, low insurance & running costs, superb£8,295

13 (63) Ford Kuga Titanium TDCi, 2 litre, metallic grey, **ONLY 65,000 MILES**, FSH, DAB, park pilot, alloys, aircon, privacy glass, outstanding£7,995

11 (11) Mazda 3 Takuya 1.6, metallic red, **ONLY 10,000 MILES**, heated seats, aircon, cruise, bluetooth, alloys, parking sensors, e/windows, low insurance and running costs, like new£7,695

12 (12) Ford Fiesta Edge 1.25, white, **ONLY 10,300 MILES**, as new 1-owner, aircon, e/windows, electric door mirrors, low insurance & running costs, outstanding£7,295

11 (11) Toyota Yaris T-Spirit, VT-i 5-Dr 1.3, Metallic black, **ONLY 56,000 MILES**, fsh, aircon, alloys, E/windows, parking sensors, low insurance & running costs, nice car, £35 road tax£5,595

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19 (19) Peugeot Partner 1000 1.6 Blue HDi 100 Professional Panel Van, fsh, silver, new shape, **ONLY 60,200 MILES**, ply-lined, aircon, side loading door, parking sensors, stunning, ready for work **NO VAT** £12,995

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EAST SUFFOLK COUNCIL
LOCAL GOVERNMENT ACT 1972
PROPOSED APPLICATION FOR THE LOWESTOFT TIDAL BARRIER ORDER
NOTICE CALLING THE SECOND MEETING OF THE COUNCIL TO APPROVE THE SUBMISSION OF A TRANSPORT AND WORKS ACT ORDER
IN ACCORDANCE with the provisions of Section 239 of the Local Government Act 1992, as applied by section 20 of the Transport and Works Act 1992, **NOTICE IS HEREBY GIVEN** that a meeting of East Suffolk Council ("the Council") will be held at Riverside, 4 Canning Road, Lowestoft, NR33 0EQ on Wednesday 22 November 2023 at 6.30pm for the purpose of taking into consideration and determining upon the expediency of confirming the resolution for the promotion by the Council of an application for the Lowestoft Tidal Barrier Order which was submitted to the Secretary of State for Environment, Food and Rural Affairs under the Transport and Works Act 1992 on 12 October 2023 in accordance with the resolution of the Council passed at a meeting held on Wednesday 15 March 2023.
 20 October 2023
 Philip Ridley
 Head of Planning and Coastal Management

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Village gnome mystery

Agenda Item 13

ES/1742

Litter pickers find figurine

Page 15



Enforcement team inspect artist's work

Bungay paintings saga rumbles on



The controversy over street art being created in the heart of Bungay has seen council enforcement officers inspect the paintings.

East Suffolk Council inspectors have visited where the street art was painted on listed buildings by Vinnie Nylon.

Mr Nylon had painted buildings to promote an exhibition at the Fisher Theatre and a way of giving something to the town for free.

BRUNO BROWN

Bruno.brown@newsquest.co.uk

However the work was created without permission from East Suffolk Council, which is responsible for conservation zones.

A council spokesman said five sites have been visited by its planning enforcement officers and a review will take place.

Full story: Page 6

Page 3



Sea cadets stalwart's 50 years' service



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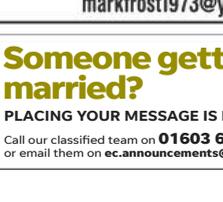
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EAST SUFFOLK COUNCIL

LOCAL GOVERNMENT ACT 1972

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20 October 2023
Philip Ridley
Head of Planning and Coastal Management

BRIAN LAURENCE STAPLETON Deceased

Pursuant to the Trustee Act 1925 anyone having a claim against or an interest in the Estate of the deceased, late of 5 St. Johns Road, Bungay, Suffolk, NR35 1DH, who died on 11/12/2022, must send written particulars to the address below by 21/12/2023, after which date the Estate will be distributed having regard only to claims and interests notified.

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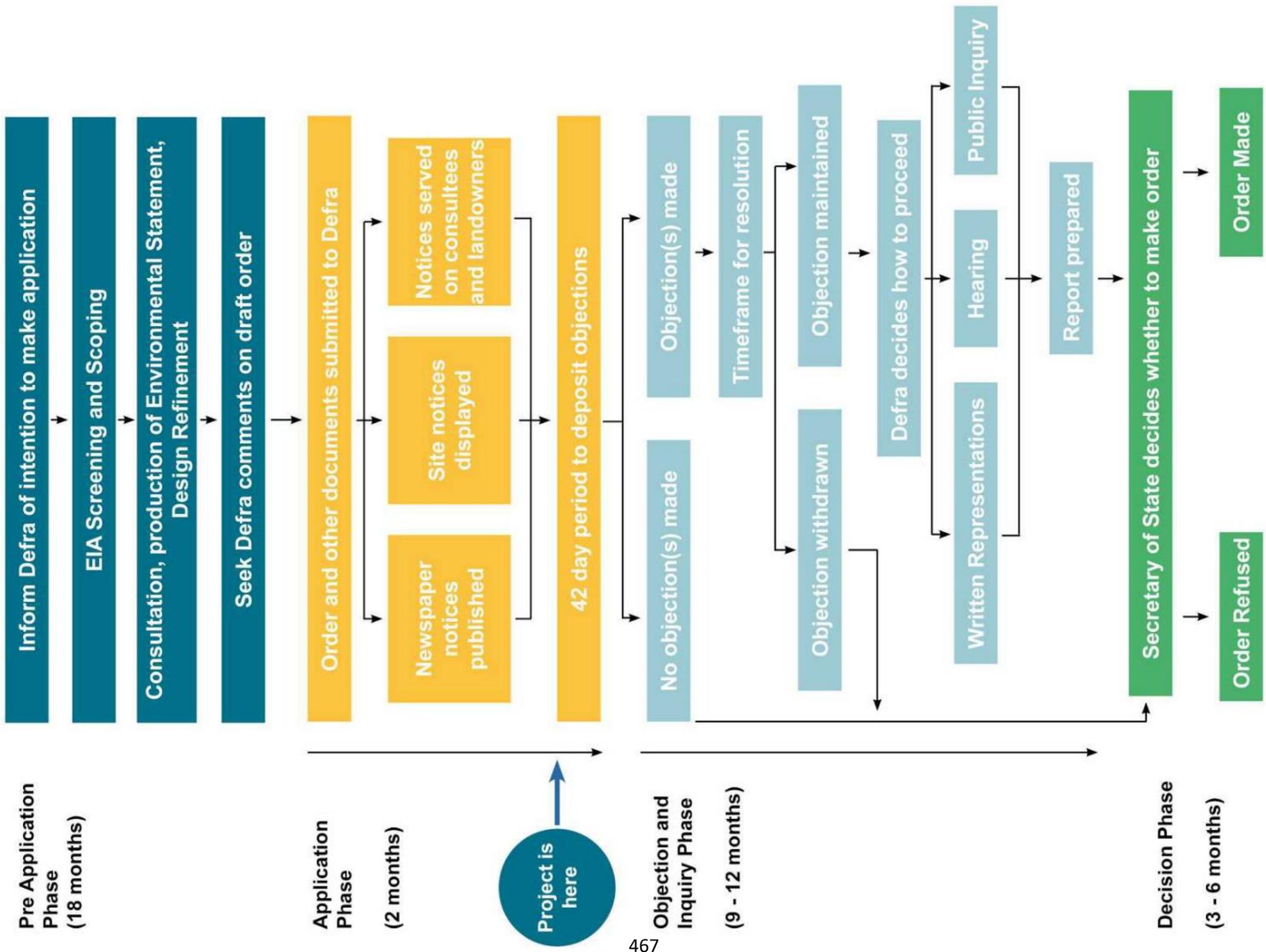
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Stacked benefits report for Lowestoft flood barrier

Draft final report

prepared for

Coastal Partnership East/East Suffolk Council

9 June 2023



Stacked benefits report for Lowestoft Flood Barrier

June 2023

Draft Final Report

Quality Assurance	
Project reference / title	J1232/Lowestoft economic appraisal
Report status	Draft Final Report
Author(s)	Teresa Fenn Pippa van Kuijk Thibault Clack Joshua Bishop Nasir Hussain
Approved for issue by	Teresa Fenn
Date of issue	9 June 2023

Document Change Record			
Report	Version	Date	Change details
Draft Final	1.0	9 June 2023	For client review

Executive Summary

Presentation of the findings

A summary of the economic appraisal is provided in three infographics:

1. The without barrier: do-nothing option: this assumes no flood barrier is constructed and there is no further investment on flood risk management in Lowestoft
2. With barrier: 40m barrier do-something option: this assumes the 40m flood barrier is constructed
3. Stacked benefits: a summary total of the present value benefits with the barrier in place.

Each diagram is supported by explanatory notes that provide an overview of the information and assumptions used in the calculations of the damages, damages avoided and benefits.

Summary of benefit-cost ratios

The overall message is that the 40m flood barrier is economically worthwhile at all levels of stacked benefits. The benefit-cost ratio for the barrier using just the benefits eligible for FDGiA is 1.3. When local/regional impacts are included, the benefit-cost ratio increases to 3.8.

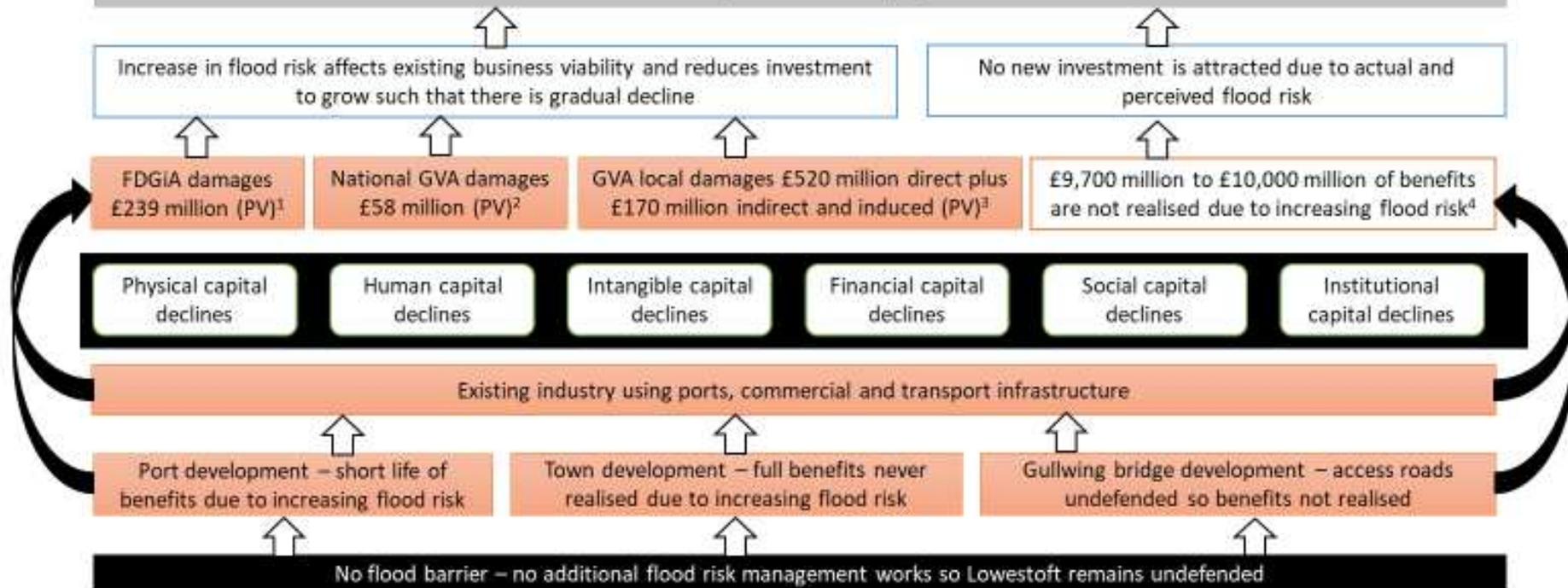
The flood barrier also underpins a lot of existing investment and is required for those investments to realise the full value of their benefits. Taking account of the benefits that would not be realised under do-nothing, increases the benefit-cost ratio of the 40m barrier to 35 to 37.

Furthermore, investment in the barrier could attract further investment. Taking account of these potential investments increases the benefit-cost ratio to 37 to 39.

In all cases the costs used for the 40m barrier are around £200 million. Sensitivity testing is included on each of the key assumptions and shows that the BCR still remains greater than one even if 30% Optimism Bias is added to these costs.

Without barrier: 'do nothing'

Lowestoft loses viability as a functioning town due to loss of main employers. Those who can move to other locations to take up jobs. Those who remain likely to have low living standards and well-being. Centre of town would become run-down and derelict with limited on-going industrial use, town would likely split in two



Explanatory notes – without barrier do-nothing:

1: From Jacobs economic appraisal (this includes national tourism and recreation damages that are estimated at £19.7 million (PV) that were excluded from the Jacobs appraisal but given the number of conservative assumptions, are included here). This also includes wellbeing impacts on those who would lose their job due to GVA effects (note this is applied to all jobs lost as it is a wellbeing impact rather than being valued based on the job). A correction has been applied to avoid double-counting with mental health impacts on those whose properties are flooded.

2: Estimated based on other studies reporting GVA impacts following flood events and GVA at risk from Mott Macdonald report, excluding PowerPark as that is protected by walls and not the barrier (note this is excluded based on 70% of total development area being outside the PowerPark (23.4ha out of 77.8ha based on Table 4.4 in the Mott Macdonald report for future employment site summary, as the value of the various site names was not given specifically). This uses the assumptions from Mott Macdonald that 30% of GVA is at risk under do-nothing today increasing to 62% in 2117. This assumes a 9-month recovery time following a flood and 10% national losses (i.e., 90% being picked up by other businesses). Evidence to support these assumptions is scarce but following floods in Cumbria in December 2015, ‘most businesses’ expected to be fully operational again by autumn 2016 with 12.5% anticipating limited trading for at least another year, while a study from Yorkshire and Humber found that full recovery took 14 months. A nine-month recovery period is therefore taken as a conservative estimate for recovery time. National losses are taken at 10% to align with the assumption on tourism national losses due to a lack of evidence on alternative assumptions. It is expected that this could be an under-estimate, especially for offshore wind where alternative sites could equally be across the North Sea (e.g. Denmark).

3: Estimated based on GVA losses from the Mott Macdonald report adjusted for the non-national losses (i.e., 90% assumed local impacts); national GVA damages are subtracted to avoid double counting. Indirect and induced damages are estimated using a multiplier of 1.3 (with 1 representing direct damages and 0.3 representing indirect and induced damages) across total damages. Indirect/induced damages are all assumed to be local losses, however any direct losses that are not picked up nationally (e.g. where offshore wind expenditure moves to other European countries) would likely also have knock-on national impacts along the supply chain. Therefore, this is conservative.

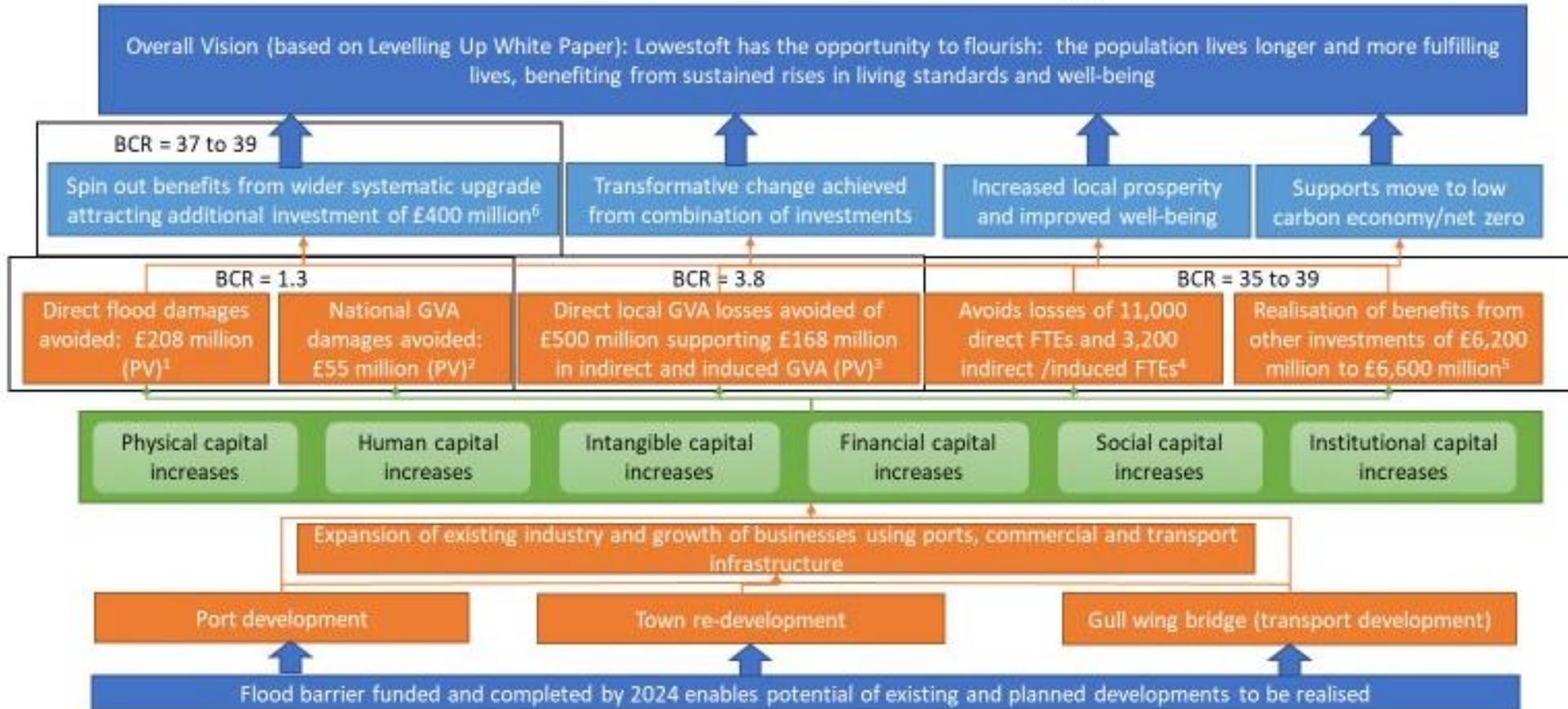
4: Estimated based on projected benefits from other investments (port, town, transport) that would not be realised. Some of the GVA future benefits may be captured within the GVA damages (from Mott Macdonald). To reduce the risk of double counting the total GVA damages have been subtracted from the future benefits:

- Port: LEEF benefits reported as £980 million to £1,360 billion to Lowestoft and East Suffolk over 60 years (extended to £1,100 million to £1,500 million over 100 years, based on increase in sum of discount factors of 1.136 (29.81 ÷ 26.23))
- Town investment plan: expected to attract £350 million of private sector investment, with £499 million of annual GVA, equivalent to £14,900 million over 100 years
- Gull wing bridge: benefits of around £300 million (based on BCR of 2.39 and costs, excluding contingency of £127 million) – benefit estimate may be conservative as takes lowest cost estimate, lowest BCR value and excludes journey time reliability benefits and wider impacts. Taking costs of £146m (including contingency) and adjusted BCR of 2.84 gives benefits of £415 million; timeframe of benefits not given so assumed over 100 years to avoid over-estimating

Total future investment over 100 years: £16,300 million to £17,200 million minus GVA benefits from Mott Macdonald estimates (£670 million) = £15,600 million to £16,500 million. Adjusted to reflect 62% of GVA at risk from flooding in future = £9,600 million to £10,000 million

All damages and job estimates are rounded to two significant figures to reflect uncertainty (other than FDGiA damages which are taken from the Jacobs economic appraisal) and are in Present Value terms over 100 years.

With 40m barrier: do something



Explanatory notes – with 40m barrier do-something:

1: From the Jacobs economic appraisal report, including tourism and recreation damages avoided that were excluded from the Jacobs assessment (see do-nothing) and includes the wellbeing damages avoided.

2: Estimated based on the Mott Macdonald report, excluding PowerPark with time for recovery from flooding based on other studies (see do-nothing). Assumes 6% of GVA would be at risk with flood barrier now increasing to 22% in 2117.

3: Estimated based on the Mott Macdonald report, excluding PowerPark including multiplier of 0.3 for indirect and induced impacts.

4: Estimated based on figures in the Mott Macdonald report that suggest £53,000 of GVA per FTE, assumed local impacts (some job losses may be national, but figure reported here is total across national, regional, and local GVA losses avoided). Direct, indirect, and induced jobs are based on total GVA impacts.

5: Estimated based on projected benefits from other investments (port, town, transport) that would be realised with flood barrier. Some of the GVA future benefits may be captured within the GVA damages (from Mott Macdonald). To reduce the risk of double counting the total GVA damages avoided have been subtracted from the future benefits:

- Port: LEEF benefits reported as £980 million to £1,360 billion over 60 years to Lowestoft and East Suffolk (extended to £1,100 million to £1,500 million over 100 years, based on increase in sum of discount factors of 1.136 (29.81 ÷ 26.23))
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Total future investment over 100 years: £16,300 million to £17,200 million minus GVA benefits from Mott Macdonald estimates (£670 million) = £15,600 million to £16,500 million. Adjusted to reflect 40% of GVA may benefit from flood barrier in future (62% GVA affected under do-nothing and 22% affected with flood barrier) = £6,200 million to £6,600 million.

6: Matvejevs & Tkacev (2023) found that public investment can attract \$2 for every \$1 invested in OECD countries over around 7 years after the public investment (<https://www.suerf.org/suer-policy-brief/59417/invest-one-get-two-extra-public-investment-crowds-in-private-investment>). The flood barrier investment is currently estimated at £200 million. This could attract a further £400 million in further investment (based on costs of £200 million).

All damages and job estimates are rounded to two significant figures to reflect uncertainty (other than FDGiA damages which are taken from the Jacobs economic appraisal and are in Present Value terms over 100 years).

Stacked benefits: summary total PV benefits

Investment future : (BCR = 37 to 39)	<ul style="list-style-type: none"> Amount of investment that could be attracted due to growth of Lowestoft with flood barrier in place of an estimated £400 million
GVA future: (BCR = 35 to 37)	<ul style="list-style-type: none"> GVA benefits from future investments linked to successful delivery of existing/planned investments: £6,200 million to £6,600 million (adjusted for GVA at risk from flooding)
GVA now: (BCR = 3.8)	<ul style="list-style-type: none"> GVA losses avoided (local/regional): £500 million (direct) plus £170 million indirect and induced (assumed all local/regional)
FDGiA: (BCR = 1.3)	<ul style="list-style-type: none"> Damages avoided: £192 million Tourism and recreational damages avoided: £17 million GVA losses avoided (national): £55 million (direct)

Explanatory notes – stacked benefits summary

Approach developed based on ‘reverse’ approach to capital stack funding, based on first sources of funders. The values given are benefits, so damages avoided compared with the do-nothing no barrier option for FDGiA and GVA now and as additional future benefits for GVA future and investment future. All numbers are Present Value over 100 years and are presented to two significant figures to reflect uncertainty:

1. FDGiA: This is the first source of funding as the project is a flood risk management project, so the benefits directly linked to flood risk management are captured there. Tourism and recreation losses were excluded from the Jacobs study but have been included here using the 10% national loss assumption as set out in Jacobs, plus the wellbeing damages avoided.
2. GVA now: some of this could be captured under FDGiA funding (as shown in the do-nothing and with barrier diagrams to reflect national losses of GVA that is already being delivered or that is already committed). Not all will be national benefits however so some additional funding sources are needed to realise the local/regional GVA benefits, with funding likely to come from other Government departments directly benefiting due to existing investments being able to be realised. **Total direct GVA impacts are national + local/regional = £560 million plus £170 million indirect/induced = £730 million.**
3. GVA future: this is not captured in FDGiA funding at all as it is not committed, but could deliver significant national, regional, and local benefits. This could attract additional funding from Government departments to reflect the add-on or follow-on benefits from their existing investments, and from private funders so they can realise future value such as increase in commercial property or land value. Some of the GVA future benefits may be captured within the GVA now benefits (from Mott Macdonald). To reduce the risk of double counting the total GVA now benefits have been subtracted from the GVA future benefits:
 - Port: LEEF benefits reported as £980 million to £1,360 billion to Lowestoft and East Suffolk over 60 years (extended to £1,100 million to £1,500 million over 100 years, based on increase in sum of discount factors of 1.136 (29.81 ÷ 26.23))

- Town investment plan: expected to attract £350 million of private sector investment, with £499 million of annual GVA, equivalent to £14,900 million over 100 years
 - Gull wing bridge: benefits of around £300 million (based on BCR of 2.39 and costs, excluding contingency of £127 million) – benefit estimate may be conservative as takes lowest cost estimate, lowest BCR value and excludes journey time reliability benefits and wider impacts. Taking costs of £146m (including contingency) and adjusted BCR of 2.84 gives benefits of £415 million; timeframe of benefits not given so assumed over 100 years to avoid over-estimating
4. Total future investment over 100 years: £16,300 million to £17,200 million minus GVA benefits from Mott Macdonald estimates (£670 million) = £15,600 million to £16,500 million. Adjusted to reflect 40% of GVA may benefit from flood barrier in future (62% GVA affected under do-nothing and 22% affected with flood barrier) = £6,200 million to £6,600 million
 5. Investment future: this is the most uncertain since it requires an assessment of the potential investments that could be attracted due to the previous investments being realised. For example, the port LEEF project is a turnkey investment that ‘triggers a new wave of change...releasing the capacity needed to allow the port to grow’. Matvejevs & Tkacev (2023) found that public investment can attract \$2 for every \$1 invested in OECD countries over around 7 years after the public investment (<https://www.suerf.org/suer-policy-brief/59417/invest-one-get-two-extra-public-investment-crowds-in-private-investment>). The flood barrier investment is currently estimated at £200 million. This could attract a further £400 million in further investment assuming the 2:1 ratio holds. This is estimated additional investment over 7 years so the 100 year investment period could attract significantly more investment, as could the combination of investments but the assumption here to link it just to the flood barrier investment is taken to ensure these benefits are not over-estimated.

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Glossary

AAD	Average Annual Damages
ABP	Associated British Ports
BEIS	Department for Business, Energy & Industrial Strategy
DBT	Department for Business and Trade
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security and Net Zero
DfT	Department for Transport
DHULC	Department for Levelling Up, Housing and Communities
DWP	Department for Work and Pensions
EA	Environment Agency
FCERM	Flood and Coastal Erosion Risk Management
FDGiA	Flood Defence Grant in Aid
FTE	Full-time equivalent
GVA	Gross Value Added
HCA	Homes and Communities Agency
LEEF	Lowestoft Eastern Energy Facility
LEP	Local Enterprise Partnership
OBC	Outline Business Case
PV	Present Value
WELLBY	Wellbeing Year (a value reflecting a one-point change in life satisfaction per person per year)

1 Introduction

1.1 The purpose of the study

The purpose of the study is to identify, assess and value the national and local impacts and benefits of the Lowestoft flood barrier scheme being proposed by East Suffolk Council to provide a flood resilient future for Lowestoft town and those who live and work there.

1.2 Approach

1.2.1 Literature review and evidence collation

Existing reports from Jacobs and Mott Macdonald have been used to understand and collate evidence on the national benefits provided to Lowestoft from the proposed barrier, and further evidence on other investment opportunities has been reviewed to assess the wider impacts of the scheme not being implemented. This has included the review of additional information coming from the Lowestoft Town Investment Plan¹ and Masterplan² that outlined the number of houses that may be built and the amount of jobs created. Information related to additional GVA generated comes from an economic impact assessment of the LEEF project³. Transport benefits related to journey time reliability and reduced congestion came from analysis of the Gullwing Bridge by the Department for Transport⁴ and also the Planning Inspectorate⁵.

1.2.2 Stacked benefits

The overall approach to the economic analysis is based on stacked benefits. This is a term used in capital finance that explores different sources of benefits from investment. We have applied the same principle here but looking instead at different sources of investment linked to the levels of uncertainty surrounding the flood risk management benefits. Stacked benefits can also be considered as a way of

¹ East Suffolk Council (2021): Town Investment Plan: Lowestoft. Available at: <https://www.eastsuffolk.gov.uk/assets/Business/Regeneration-projects/Lowestoft-Investment-Plan/Lowestoft-Town-Investment-Plan.pdf> on 8 June 2023.

² East Suffolk Council (2020): Lowestoft Town Centre Masterplan. Available at: <https://www.eastsuffolk.gov.uk/assets/Business/Regeneration-projects/Lowestoft-Town-Centre-Masterplan.pdf> on 8 June 2023.

³ Opergy & Metro Dynamics (2021): Economic impact assessment of the Lowestoft Eastern Energy Facility (LEEF) project, July 2021.

⁴ Department for Transport (2020): Application for the proposed Lake Lothing Third Crossing development consent order. Available at: <https://gullwingbridge.co.uk/wp-content/uploads/2021/02/LLTC-SoS-Decision-letter.pdf> on 26 May 2023.

⁵ The Planning Inspectorate (2019): Lake Lothing Third Crossing – Examining Authority’s Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport. Available at: <https://gullwingbridge.co.uk/wp-content/uploads/2021/02/LLTC-Examining-Authority-Report.pdf> on 26 May 2023.

drawing in investors who will each pay for a specific element of the benefit (such as for different ecosystem services) such that the overall investment for an action is much greater than if just one investor paid for the benefits that they were interested in.

For the Lowestoft flood barrier, the approach is used that there will be different funders interested in different outcomes. For Defra, the focus is on the Flood Defence Grant in Aid (FDGiA) benefits, while other Government departments will be interested in investments they have made that could be undermined without the flood barrier. On top of this, are potential additional investments that could be attracted with the flood barrier in place, and once the benefits from all the other investments have been realised. Our approach has been to develop the stacked benefits associated with the flood barrier on this basis:

- FDGiA funding: this is the main source of funding as the flood barrier project is specifically designed to reduce flood risk to the town;
- GVA now: this comprises two elements:
 - GVA losses avoided that are significant at the national level: where these are planned and in place they can be linked to FDGiA benefits;
 - GVA losses avoided that are significant at the local and regional level: these would be of interest to local and regional public bodies and investors, as well as Government departments and relate specifically to GVA that is at risk from flooding.
- GVA future: this relates to investments that have been made by other Government departments that may not be realised (or fully realised) if the flood barrier is not constructed. This is because the flood risk is expected to increase to 20% (1 in 5) by 2117 under the do-nothing option which would have serious consequences for the town and its viability.
- Investment future: this relates to future private investment that could be attracted on the back of the public investment that has taken place. To avoid over-estimating these benefits (and to ensure that other investments can identify their own knock-on effects), this is linked only to the public investment in the flood barrier.

The remainder of this report describes the approach that has been taken to estimating each layer of the stacked benefits, the assumptions made, uncertainties and limitations.

1.3 The scenarios

The assessment considers two options:

- Do-nothing: where there is no further investment in flood risk management and a flood barrier is not constructed. This results in the flood risk increasing from around 0.66% now (1 in 150) to 20% (1 in 5) by 2117. Assumptions on assets at risk under do-nothing is based on work undertaken by Jacobs⁶ and Mott Macdonald⁷.
- 40m flood barrier: where there is investment to construct a 40m flood barrier that will avoid an increase in flood risk to the town.

⁶ Jacobs (2022): Lowestoft Tidal Economics for OBC 2022, Revision P01, 14 September 2022, Appendix E1 to the OBC.

⁷ Mott Macdonald (2022): Lowestoft Flood Risk Economic Footprint and Impact Report, May 2022, Appendix F3 to the OBC.

1.4 Costs of the barrier

The latest costs for the 40m flood barrier have been provided by East Suffolk Council and come to £199,932,580.59 for the AECOM assessment-most likely (costs shared 7 June 2023). These are the costs that are used in calculating the benefit-cost ratio as each benefit stack is applied. A sensitivity analysis is included looking at the impact of adding a further 30% Optimism Bias to these costs, although significant account is allowed for risk within the AECOM cost estimates.

1.5 Structure of this report

The remainder of this report is structured as follows:

- Section 2 provides a review of the FDGiA benefits;
- Section 3 summarises the GVA benefit, covering both GVA now and GVA future;
- Section 4 discusses potential future investment benefits; and
- Section 5 looks at how the various benefits identified in each 'stack' can be attributed to different Government departments.

To provide easy access to the findings, each section starts with a summary of the estimated benefits and the key assumptions and evidence that underpin those estimates. This is followed by a review of the evidence and the detailed approach to the calculations. This report draws on many sources and references to generate an estimate of the stacked benefits from the flood barrier. These references are included in each evidence section. Finally, each section considers the sensitivity of the calculations to some of the key assumptions and explores how changes to these assumptions could affect the economic appraisal and the benefit-cost ratio.

2 Review of the FDGiA benefits

2.1 Summary of findings

2.1.1 Do-nothing

Under do-nothing, no further flood risk management activities would be undertaken leaving the town largely undefended⁸. The Jacobs (2022) report estimates damages of £148 million under do-nothing. This excludes the national impact on tourism and recreation, and direct GVA impacts from flooding (although indirect damages on non-residential properties are included at £2.1 million). If the national tourism and recreational losses are included then the total damages under do-nothing become £168 million.

Mott Macdonald (2022) identifies that 30% of GVA is at risk under do-nothing, increasing to 62% in 2117. However, GVA is measured annually and needs to be adjusted to take account of the time over which GVA might be affected following a flood. A 9-month recovery time is assumed (based on evidence on actual recovery times following floods in Cumbria), so 75% of GVA is assumed to be impacted when a flood occurs. Of this, 10% is taken as national losses. These losses are converted to Annual Average Damages (AAD) using the FCERM spreadsheets to give PV damages under do-nothing of £58 million.

Impacts on those people that would lose their jobs due to the impacts on GVA from future flooding are based on WELLBYs with an assumption of 0.5 change in life satisfaction across 10,392 people (this excludes those who are flooded and assumes all those flooded would also lose their job, which is likely to under-estimate the wider wellbeing effects). These damages are converted to AAD using the FCERM spreadsheets with PV damages estimated using the health discount rate. This gives additional PV damages of £71.3 million.

The total damages under do-nothing taking into account national FDGiA damages are £297 million.

2.1.2 With flood barrier

Jacobs (2022) gives damages avoided with a 40m flood barrier of £120 million. This increases to £137 million if national tourism and recreation losses are included.

The direct national GVA losses avoided are estimated at £55 million. This increases the total damages avoided to £192 million.

The wellbeing damages avoided are estimated at £71.1 million. This increases the total damages avoided to £264 million.

The benefit-cost ratio taking into account national FDGiA damages avoided is 1.32 (costs taken as £199,933k).

⁸ The only exception is the defences that have been constructed for the PowerPark but these are excluded from this economic appraisal.

2.2 Summary of evidence reviewed

The main sources of evidence are the Jacobs (2022) and Mott Macdonald (2022) reports which provide estimates of the flood damages and damages avoided with and without the barrier. Additional sources of evidence have then been reviewed to identify evidence to underpin assumptions that will allow GVA impacts to be converted to AAD at the national level, and to assess how much wellbeing might reduce for those whose jobs would be lost under do-nothing.

2.2.1 Review of Jacobs (2022)

The Jacobs (2022) report provides a comprehensive assessment of the damages and damages avoided, although the detail in terms of what is impacted under do-nothing is somewhat limited.

The report notes that flood warning benefits are excluded from the appraisal as the viability and business case for flood warning is not under assessment in this business case. There could be a case for including flood warning benefits since operation of the barrier will be reliant on flood warnings to be effectively and efficiently employed. This could potentially help reduce some of the residual damages, which are high at around £31 million even with the barrier in place. Much of this residual damage is on non-residential property (£21.3 million).

The Jacobs (2022) report considers impacts on health impacts from stress due to flooding but it does not include impacts on the wider population from the regular flooding of the town. Flood risk is projected to increase to 20% (1 in 5) by 2117 and would impact much of the centre of the town. This will result in disconnect between the north and south parts of the town and a loss of significant employment opportunities. Thus, the impact on well-being is expected to extend to a much larger population than just those impacted by flooding. Additional social benefits are therefore estimated and could be included as part of the wider, indirect effects of do-nothing on the well-being of those whose jobs could be lost. This has been explored through a review of evidence on impacts of job loss on life satisfaction (Section 2.2.2) and use of the HM Treasury supplementary guidance on wellbeing in appraisal to monetise the benefits.

2.2.2 Evidence on impacts of job loss on life satisfaction

There is a significant evidence base relating to the reduction of life satisfaction from loss of a job, with much evidence coming from Germany. For example, Akay et al (2021)⁹ found that life satisfaction decreases from 6.42 to 5.83 upon loss of employment (a reduction of 0.59, based on a scoring system from 0 to 10). Nikolova et al (2020)¹⁰ found that life satisfaction changed by around 1.4 points when going from self-employed to unemployment and by around 1 point when moving from salaried employment to unemployment (data again for Germany; again using a standard scoring system of 0

⁹ Akay A et al (2021): Life satisfaction, pro-activity, and employment, GLO Discussion paper No 784, Global Labor Association, Essen. Available at: <https://www.econstor.eu/bitstream/10419/230522/1/GLO-DP-0784.pdf> on 7 June 2023. Data based on statistics from 1984 to 2009.

¹⁰ Nikolova M et al (2020): Losing your own business is worse than losing a salaried job. Available at: <https://www.brookings.edu/blog/up-front/2020/05/07/losing-your-own-business-is-worse-than-losing-a-salaried-job/> on 7 June 2023.

to 10). A meta-analysis by Luhmann et al (2012)¹¹ found a significant negative effect on cognitive well-being, although the change was variable, but with a mean of around 0.43.

To err of the side of caution, it is assumed that there is a 0.5 reduction in life satisfaction from loss of a job due to the increased risk of flooding without the flood barrier.

2.2.3 Review of Mott Macdonald (2022)

The report looks to capture the economic benefits from employment land, jobs and GVA, and land that is presently vacant or under-utilised.

The area around Lake Lothing is a key focus of strategic regeneration as set out in the Lake Lothing Area Action Plan and then within the Local Plan (2019). In addition, the Town Centre Masterplan and Towns Fund award demonstrate the regeneration activities taking place to revitalise the town centre post pandemic. The major regeneration plans for central and coastal Lowestoft increase the need to protect the area from flooding in the future. This suggests that all the benefits are avoided flood damages.

Lowestoft is designated as a growth area at national, sub-regional and local level as evidenced through its Enterprise Zone (EZ) status. The area around Lake Lothing is recognised as a strategically important area with the potential to transform former industrial sites which are now derelict or under-utilised, supporting future residential and commercial development while further developing the town's strengths in offshore renewables, offshore related engineering, and port related services. These are well aligned to the Government's clean growth and levelling up agenda.

Two scenarios are considered:

- Existing position: analysis based on current land use patterns and amount of economic activity estimated on each site.
- Future position: analysis based on economic activity associated with future development and land utilisations based on policy in the Local Plan.

Under the existing position, 30% of GVA and jobs are at risk under do-nothing, reducing to 6% with a 1 in 200 barrier. Under the future position, 62% of GVA and jobs are at risk under do-nothing, reducing to 22% with a 1 in 200 barrier. The benefits show that there would be significant impact on the local economy, but also the wider economy without the flood barrier. The area around Lake Lothing is particularly at risk from flooding, and investment in effective flood mitigation measures is required to secure the future generation of the town and accelerate the adoption of growth sectors such as offshore renewables and engineering. The Lowestoft Town Centre Masterplan reinforces the requirement to invest in effective flood mitigation to protect future development and attract inward investment.

With no changes to the existing flood defences, the impact of climate change will increase both magnitude and frequency of flooding at Lowestoft significantly. The probability of a repeat of the December 2013 event would increase from less than 1% (1 in 150) to 20% (1 in 5) by 2117.

¹¹ Luhmann M et al (2012): Subjective well-being and adaptation to life events: a meta-analysis on differences between cognitive and affective well-being, *J Pers Soc Psychol*, 102(3), 592-615. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3289759/> on 7 June 2023.

The Local Plan identifies areas with significant opportunities for development and represents land that is suitable and likely to become available for redevelopment during the period until 2036. A multiplier of 0.3 has been added to gross direct impacts to estimate the number of indirect and induced jobs supported, in line with Homes and Communities Agency (HCA) additionality guidelines.

The current economic footprint includes 6,400 direct jobs with GVA of £342 million per annum, plus 1,900 indirect and induced jobs and £101 million indirect and induced GVA. It is assumed that 30% of those benefits are at risk under do-nothing for the current situation. This is an impact of 1,900 direct jobs and £101 million GVA plus 600 indirect and induced jobs and £32 million indirect and induced GVA. With the flood barrier, these impacts reduce to 6% with 400 jobs and £21 million of GVA affected directly, plus 100 indirect and induced jobs and £5 million indirect and induced GVA.

The future economic scenario suggests 12,000 direct jobs and £641 million in GVA would be supported per annum, plus 3,600 indirect and induced jobs and £192 million indirect and induced GVA. Under do-nothing 62% is at flood risk, this is 7,400 direct jobs and £395 million direct GVA plus 2,200 indirect and induced jobs and £117 million indirect and induced GVA. Of this, 22% is assumed to be impacted by flood risk with the flood barrier which equals 2,600 direct jobs and £139 million direct GVA, plus 800 indirect and induced jobs and £43 million indirect and induced GVA.

The analysis only considered future economic activity for employment sites set out in the Local Plan or following consultation with East Suffolk Council. There is significant uncertainty around quantity, quality, scale, configuration, and design of individual developments, so the estimate is based on assumptions.

It is important to note that the GVA is the total effect of economic activity in the study area. The effect of a short-lived flood event would not be the same as the financial GVA, although it is at risk if companies are not able to recover and reinstate their productive activity.

It is also important to note that the report includes the PowerPark, but this is excluded from the Jacobs (2022) appraisal as it would be protected by the walls. Although specific values are not given for each development area separately, the PowerPark is shown as accounting for 30% of the development area, so 30% of the impacts are excluded in this assessment and assumed to relate to the PowerPark.

2.2.4 Evidence on recovery times for non-residential properties following flooding

Cumbria County Council undertook a Business Survey following flooding December 2015¹² finding that most respondents expected to be fully trading again by the autumn of 2016, although 1 in 8 (13%) anticipated limited trading until spring 2017 and one business expected to close. The survey itself was set up very quickly following the flooding and received 673 responses. It is based on self-selected responses so is expected to be biased towards affected businesses. This suggests it takes around 9 months for businesses to fully recover from flooding, but that this may be an under-estimate for 13% of businesses.

¹² Cumbria County Council (2018): Flooding in Cumbria, December 2015, Impact Assessment. Available at: <https://cumbria.gov.uk/elibrary/Content/Internet/536/671/4674/17217/17225/43312152830.PDF> on 8 June 2023.

A study by Mendoza-Tinoco et al (2017)¹³ on the Yorkshire floods of 2007 found that half of the economic damages on the region's GVA came during the first fourteen months of recovery. The study also concludes that it takes at least 14 months for the economy to return to its pre-flood situation.

To avoid over-estimating the impacts, an assumption of a nine month recovery period is used in this assessment. This is then tested in sensitivity analysis.

2.2.5 Evidence on national losses following flooding of non-residential properties

Evidence on national losses following flooding is limited. A study by Aerts (2019)¹⁴ found indirect losses can be offset by up to 60% through use of alternative suppliers and markets. However, as indirect losses rise with increasing flood risk, it can become more difficult to offset losses in this way. For Lowestoft, this is likely to relate to the immediate effect when existing orders, etc. may be affected by flooding of businesses who are then unable to realise those orders. Over time, it could be expected that companies in Lowestoft would be affected reputationally with organisations reluctant to place orders when there is a high risk of flooding. As such, national losses could decrease over time while local losses increase. Thus, there is no clear evidence to inform an assumption on the percentage of GVA losses that could be felt nationally.

One of the key areas of expansion for Lowestoft is in the offshore wind energy sector. The town is competing with other UK ports, but also European ports for this investment. In terms of the European supply chain, it is Germany, Netherlands and Denmark that are particularly strong, all of which would be direct competitors to Lowestoft. Were investment to move to these countries rather than other UK ports, then the national losses could be much more significant than 10%. It is not possible currently to place an estimate of what this additional national loss could be as there is no quantified evidence to draw on, but it would be much more difficult for other UK ports (given capacity limitations at east coast locations such as at Great Yarmouth and Felixstowe) to attract this investment and there is a significant risk it could move to outside the UK.

Given the lack of alternative evidence, it is assumed that 10% of damages would be felt nationally to align with the assumption used for tourism and recreation. Sensitivity analysis is used to assess how changes in this assumption could affect the benefit-cost ratio.

2.2.6 Evidence on knock-on effects outside the flood area

The regular Cumbria LEP business Survey was undertaken four months after the floods and captured 1,458 businesses of which 368 (25%) were in the Environment Agency flood extent area (reported in Cumbria County Council, 2018). This found that 65% of businesses had seen a negative impact from the storms and floods. With the Environment Agency flood extent areas, 86% reported experiencing a negative impact. Of the 65% of businesses affected (which is significantly greater than the 25% of businesses surveyed that were in the flood area), 60% reported a financial loss or additional costs. The mean financial loss was £35,759 but was £84,455 in the Environment Agency flood extent areas. The mean additional cost was £54,608 but was £99,496 in the Environment Agency flood extent areas.

¹³ Mendoza-Tinoco D et al (2017): Flood footprint of the 2007 floods in the UK: The case of the Yorkshire and the Humber region. *Journal of Cleaner Production*, 168, 655-667. Available at: <https://www.sciencedirect.com/science/article/pii/S0959652617320048> on 8 June 2023.

¹⁴ Aerts JCJH (2019): The macroeconomic impacts of future river flooding in Europe, *Environmental Research Letters*, Volume 14 (8). Available at: <https://iopscience.iop.org/article/10.1088/1748-9326/ab3306/meta> on 8 June 2023.

This suggests that there are considerable knock-on costs for businesses outside the flood extent area. Based on the figures above, the knock-on damages are estimated at:

- Financial loss:
 - Business in flood extent area: $368 \times 86\% \times \text{£}84,455 = \text{£}26.7$ million
 - Businesses outside flood extent area (adjusted to exclude businesses reporting a loss in the flood extent area): $1,458 \times 60\% - (368 \times 86\%) \times \text{£}35,759 = \text{£}20.0$ million
 - Knock-on losses to businesses outside the flood extent area = 75% on top of damages in flood extent area
- Additional costs:
 - Business in flood extent area: $368 \times 86\% \times \text{£}99,496 = \text{£}31.4$ million
 - Businesses outside flood extent area (adjusted to exclude businesses reporting a loss in the flood extent area): $1,458 \times 60\% - (368 \times 86\%) \times \text{£}54,608 = \text{£}30.5$ million
 - Knock-on costs to businesses outside the flood extent area = 103% on top of damages in flood extent area

These additional damages are not picked up to this extent in Jacobs (2022) economics report as that uses the MCH guidance to assess non-residential indirect. Under do-nothing in Jacobs (2022), these damages are given as £2.1 million compared with non-residential property damages of £75.6 million. This equates to knock-on effects of 2.7% compared with 75% for financial losses and 103% for additional costs as reported following the Cumbria floods.

Somerset Rivers Authority (2015)¹⁵ found business impacts from flooding were between £2.5 million and £4.1 million (central estimate of £3.3 million). GVA impacts were measured locally for Somerset Levels and Moors as £0.9 million to £2.8 million and for the wider Somerset area at £3.4 million to £10.3 million. This was based on a survey with businesses in August 2014 (so around 8-10 months following flooding). These figures likely include businesses that were flooded (with 60 businesses identified as having been impacted) with 50% of those surveyed saying they were affected by flooding. The knock-on effects from these figures are 36% to 68% for the Somerset Levels and Moors and 74% to 250% for the wider Somerset region. The range of values at the regional level (74% to 250%) is similar to that seen from the Cumbria study (75% for financial losses) but at the low end of the range. The Somerset study does not report on additional costs, but instead bases the estimates on change in GVA.

This potential increase in damages is not added to the Jacobs (2022) estimates since it is considered that these damages would be reflected in the GVA damage estimates. However, they are used in sensitivity in Section 3.4 to compare against the GVA damage estimates to provide an assessment of the extent to which the calculated indirect/induced GVA damages may reflect these reported additional losses and costs at the local/regional level.

¹⁵ Somerset Rivers Authority (2015): Somerset Economic Impact Assessment of the Winter 2013/14 flooding, report by Parsons Brinkerhoff. Available at: <http://www.somsetriversauthority.org.uk/wp-content/uploads/2018/06/22-July-2015-ITEM-8-Economic-Impact-Assessment-full-report.pdf> on 8 June 2023.

2.3 Approach to estimating the benefits

2.3.1 Tourism and recreation benefits

Jacobs (2022) excludes tourism and recreational benefits even though it acknowledges that 10% of the damages would potentially be realised at the national level. It is suggested that these are included in the main assessment and excluded for sensitivity analysis. The benefits as reported in Jacobs (2022) are included in an AAD worksheet in the FCERM spreadsheets and then estimated based on risk of flooding under both do-nothing and with barrier. This gives damages of £19.7 million under do-nothing and £2.6 million under the barrier option, giving damages avoided with the barrier of £17.1 million.

2.3.2 National GVA losses

Mott Macdonald (2022) estimates the GVA at risk due to flooding. The calculations assume a nine-month recovery period following flooding for GVA so take 75% of the annual impacts. An assumption is also made that the national losses are 10%. The AAD worksheets are used to reflect the likelihood of flooding in any one year for do-nothing now and do-nothing in 2117/2119 (i.e., in 100 years' time). The total area under the curve is then used as the AAD and included in the do-nothing and flood barrier damage sheets to allow the likelihood that AAD are experienced in any one year to be calculated.

2.3.3 Change in life satisfaction for those losing their jobs

Using Mott Macdonald (2022) estimates suggests that 11,000 direct jobs and 3,200 indirect/induced jobs would benefit from the flood barrier. Jacobs (2022) shows that there are 1,804 residential properties affected in 2119. Assuming 2 adults per household and that these people are the ones whose jobs would be affected suggests that mental health effects on 3,608 adults have already been considered. This leaves 7,392 people whose mental health could be affected due to loss of their direct job plus 3,200 due to loss of their indirect/induced job and associated changes to the town (note impacts on those whose job is not affected though they would be affected by changes to the town, are not captured). HM Treasury (2021)¹⁶ proposes the use of a change in WELLBYs to reflect change in life satisfaction. This is assumed to be more relevant here than the Environment Agency guidance on mental health impacts from flooding, since the changes relate to loss of a job, loss of access to services within the town, increasing deprivation and worsening living conditions. The value of a WELLBY is given as £13,000 (range £10,000 to £16,000) per year.

Based on the review of evidence, it is suggested that a change in life satisfaction of 0.5 be taken to be conservative (range was 0.43 to 1.4), giving annual impacts of £6,500 per person (range £5,000 to £8,000 per year). The Present Value (PV) damages are based on Annual Average Damages (AAD) with damages assumed to recur every year, i.e., once a job is lost it remains lost as flood risk increases. Over 10,392 people, the damages are thus £68 million per year. These values are entered into the FCERM spreadsheets to take account of the likelihood that flooding has occurred. As these damages relate to wellbeing, the health discount rate is applied. Adjusted for the risk of flooding over time, the PV damages under do-nothing are estimated at £71.3 million. Residual damages under the with barrier option are £0.2 million, giving damages avoided of £71.1 million.

¹⁶ HM Treasury (2021): Wellbeing guidance for appraisal: Supplementary Green Book guidance. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005388/Wellbeing_guidance_for_appraisal_-_supplementary_Green_Book_guidance.pdf on 7 June 2023.

This is still likely to be an under-estimate as the impacts on the town by 2117 are such that almost all the population living in the town would be affected, not least by a reduction in their property values, and in their quality of life, in terms of access to shops and other services.

2.4 Sensitivity testing

2.4.1 Changing assumption on recovery time and national impacts

The main assessment identifies time taken for GVA to recover following flooding as 9 months (on average). Thus, the main assessment assumes 75% of GVA damages for recovery in any one year (based on evidence from previous flood events but erring on the side of caution). This is based on evidence from Cumbria County Council (2018). Evidence from Yorkshire and Humber (Mendoza-Tinico, 2017) suggests that it took 14 months for the economy to recover to its pre-flood situation. This would suggest that 100% of the GVA damages per year could be taken (and that there would be some knock-on effect into the next year). If the full 12 months impact on GVA is taken, then the national damages under do-nothing increase from £58 million to £77 million, and the damages avoided increase to £74 million.

This would increase the BCR based on national FDGiA benefits to 1.41 (from 1.32).

2.4.2 Changing assumption on national impacts

The main assessment identifies national GVA losses based on the amount of impact that would be felt nationally, assuming local/regional impacts can be compensated for through displacement or transfer to other businesses within the country. The main assessment assumes 10% of damages that are felt nationally (to align with the assumption used for tourism and recreation). There is no clear evidence from previous flood events of how much GVA impacts were felt nationally (rather than locally or regionally). The total damages avoided without any GVA damages avoided are £208 million, so this still exceeds the costs by £8.5 million. Therefore, the with barrier option is still economically worthwhile even if it is assumed that zero GVA damages felt locally result in impacts at the national level. If the national losses are higher (due to overseas competition for offshore wind investment), then the damages avoid would increase and so with it the BCR.

Changing the assumption of national GVA losses to 0% (from 10%), i.e. assuming zero GVA impact nationally, reduces the BCR to 1.04.

2.4.3 Using lower and higher WELLBY estimates

HM Treasury (2021) gives a range of WELLBY values from £10,000 to £16,000 per one point reduction in life satisfaction score. If the £10,000 value is taken, then the damages would be £5,000 per person whose job is lost and if the higher value is used then the damages become £8,000 per person whose jobs is lost. This would change the total damages and damages avoided to:

- Lower WELLBY:
 - Damages under do-nothing: £54.9 million
 - Damages under the barrier: £0.2 million
 - Damages avoided with the barrier: £54.7 million
 - **FDGiA benefits BCR: 1.24 (from 1.32)**
- Higher WELLBY:
 - Damages under do-nothing: £87.8 million

- Damages under the barrier: £0.3 million
- Damages avoided with the barrier: £87.5 million
- **FDGiA benefits BCR: 1.40 (from 1.32)**

The lower WELLBY reduces the FDGiA BCR to 1.24 which is still robustly greater than one, although conservative assumptions have already been made with the change in life satisfaction score (0.5 being much lower than estimates across some of the literature). The assessment ensures there is no double counting by excluding all those included in the human intangible stress and health benefits, even though that relates just to flooding impacts not job loss effects. This assessment also assumes that there are no impacts on life satisfaction for those living in Lowestoft but who do not work in the industries affected by flooding.

2.4.4 Including optimism bias

The cost estimates provided by East Suffolk Council include costed risk logs for construction and non-construction, plus some additional risk allowances. However, if a further 30% Optimism Bias (OB) is added then the costs would increase to around £260 million.

This increase in costs would reduce the BCR to 1.01 (from 1.32).

3 GVA benefits

3.1 Summary of findings

3.1.1 Do-nothing

GVA now

Although only 10% of the losses are assumed to be felt nationally, the remaining 90% will be felt locally and regionally. These amount to £520 million in direct GVA impacts. On top of these are the indirect and induced GVA effects that occur along the supply chain. These have not been included in the national losses as it is assumed most will be felt locally¹⁷. These indirect and induced damages are estimated at £190 million.

The total damages under do-nothing taking into account local/regional flood damages are £820 million.

GVA future

There are significant investments proposed, all of which rely on the flood barrier being in place to realise the full value of their potential benefits. These benefits are all at risk if the flood barrier is not constructed (all figures given as Present Value over 100 years):

- Port infrastructure investment: benefits at-risk are estimated at £1,100 million to £1,500 million
- Town infrastructure investment: benefits at-risk are estimated at £14,900 million
- Transport infrastructure investment (Gull wing bridge): benefits at-risk are estimated at £415 million¹⁸

Since all these investments are future benefits at-risk, it is assumed that 62% would be lost under do-nothing (based on Mott Macdonald, 2022). The 62% assumption relates to 2117 so may over-estimate impacts in the short-term. However, confirmation that the flood barrier would not be built is expected to result in significant reputational risk for Lowestoft which would likely increase the extent to which current investments can realise their benefits immediately. The potential damages in terms of 'benefits lost' under do-nothing is estimated at £9,700 million to £10,000 million (PV over 100 years).

The total damages under do-nothing taking into account the additional and wider benefits that would not be realised are £10,500 million to £10,800 million.

¹⁷ This is a simplifying assumption that may under-estimate the national losses especially if considering the importance of industries such as offshore wind.

¹⁸ The timescale over which these benefits had been estimated was not given so it is assumed to be 100 years

3.1.2 With flood barrier

GVA now

With the flood barrier, the direct local/regional GVA losses avoided are estimated at £500 million with a further £168 million from indirect and induced GVA damages avoided. This will avoid losses of some 11,000 FTEs and a further 3,200 indirect and induced FTEs.

The benefit-cost ratio taking into account local/regional flood damages avoided is 3.8 (costs taken as £199,933k).

GVA future

With the flood barrier, a significant proportion of the benefits from other investments would be realised. Mott Macdonald (2022) highlights that 22% would still be at risk even with a 40m barrier so these would result in realisation of benefits from other investments of £6,200 to £6,600 million¹⁹.

The benefit-cost ratio taking into account the additional and wider benefits that will be realised with the flood barrier is 34.8 to 36.8 (costs taken as £199,933k).

3.2 Summary of evidence reviewed

The GVA now and GVA future benefits draw on Mott Macdonald (2022), as summarised in Section 2.2.3. The local damages would decrease if the percentage assigned to national benefits increases (e.g. if a higher national loss is assumed for offshore wind given that competitors are located across the North Sea), and vice versa.

3.3 Approach to estimating the benefits

The approach to estimating the local/regional GVA now and GVA future benefits follows the same approach as for the national benefits (see Section 2.3.3) with the percentage assigned to local/regional benefits being the difference between the percentage assigned to national benefits and 100%. For the main assessment, the assumption is that 10% of GVA losses under do-nothing are national, so this means that 90% of the losses are local/regional.

3.4 Sensitivity analysis

3.4.1 Comparing losses and costs outside the flood extent from Cumbria with GVA damages

The Cumbria County Council (2018) report identified the additional financial losses and additional costs that were incurred by businesses affected by flooding, whether these were inside the flood extent, or outside. The knock-on financial losses were estimated at 75% and additional costs at 103%

¹⁹ Larger benefits may be possible with inclusion of flood warning. The current economic appraisal ignores flood warning but this would be a prerequisite for appropriate and timely operation of the barrier. Furthermore, with the barrier in place there may be opportunity for the port to revise its operations upon receipt of a flood warning to reduce the impacts on GVA, e.g., by making more use of the Inner Harbour which would be protected by the flood barrier.

of those costs experienced inside the flood extent area. The knock-on financial losses are considered here alongside the additional costs for comparison with the overall GVA losses and losses avoided.

The percentage for financial loss is applied to the non-residential property damages reported in Jacobs (2022) which are given as £75,575,720, then the non-residential property damages outside the floodable area would be as follows (the same calculation is applied to the damages on non-residential property reported for the 40m barrier which are £21,316,942 in Jacobs (2022)):

- Do-nothing:
 - Financial losses: $£75,575,720 \times 75\% = £56,681,790$
 - Additional costs: $£75,575,720 \times 103\% = £77,842,992$
 - Total knock-on damages = £134,524,782
- 40m barrier:
 - Financial losses: $£21,316,942 \times 75\% = £15,987,707$
 - Additional costs: $£21,316,942 \times 103\% = £21,956,450$
 - Total knock-on damages = £37,944,157
- Damages avoided with 40m barrier:
 - Financial losses avoided: £40,694,084
 - Additional costs avoided: £55,886,542
 - Total knock-on damages avoided: £96,580,625

These estimated costs at £97 million are lower than the impacts based on the GVA calculations, which for the indirect/induced impacts are £190 million for Lowestoft. However, the Lowestoft impacts reflect repeated flooding and increasing risk of flooding over time (up to 20% by year 99). Therefore, it would be expected that such repeated flooding would result in greater impacts.

Somerset Rivers Authority (2015) reports knock-on GVA impacts of 74% to 250% at the regional (county) scale. If these values are applied to the non-residential losses, the GVA impacts are estimated at £56 million to £189 million under do-nothing and £16 million to £53 million with the flood barrier, giving GVA damages avoided of £40 million to £136 million. It is unclear if these also capture direct GVA impacts, although the description of the survey suggests that they may just be indirect/induced effects not associated with the flooded businesses themselves. These impacts were in a largely rural area so it would be expected that the knock-on GVA effects might be lower than seen in an urban area.

4 Future investment benefits

4.1 Summary of findings

4.1.1 Do-nothing

Under do-nothing, no new investment will be attracted since there will be no public investment in a flood barrier.

The total damages under do-nothing taking into account the future investment that would not be attracted are £10,900 million to £11,200 million.

4.1.2 With flood barrier

With the flood barrier, there could be additional investment attracted linked to all the other investments that are in place. To avoid over-estimating, the potential benefits are linked only to the public investment in the flood barrier (not to the other investments). Matvejevs & Tkacev (2023)²⁰ found that public investment can attract \$2 for every \$1 invested in OECD countries over a period of around seven years following the investment. Taking flood barrier costs at £200 million could therefore deliver private investment benefits of around £400 million. Given that the flood barrier is already recognised as a keystone investment in delivering other public (e.g. Towns fund) and private (e.g. ABP LEEF port investment), some of this may already have been realised.

The benefit-cost ratio taking into account the potential future investment that could be attracted once the flood barrier is constructed is 36.8 to 38.8 (costs taken as £199,933k). Note this is based on the value of the investment that is attracted, not the benefit of that investment so is likely to be an under-estimate.

4.2 Summary of evidence reviewed

4.2.1 Evidence on public investment attracting further investment

There are numerous studies that find public investment attracts further investment. Glocker et al (2019) analysed UK government spending between 1966 and 2015 and found that the multiplier varies depending on where in the cycle the economy is²¹. They concluded that the investment multiplier is at its highest during a recessionary period and is lower during a period of expansionary activity. This is supported by a working paper published by the IMF (2021) that came to a similar conclusion, stating that during periods of “high uncertainty” public investment has a larger and longer-lasting effect on output, investment, and employment, with multipliers above two²². Deleidi et al (2019) undertook an

²⁰ Matvejevs & Tkacev (2023): Invest One – Get Two Extra: Public Investment Crowds in Private Investment, SUERF Policy Brief No 499. Available at: <https://www.suerf.org/suer-policy-brief/59417/invest-one-get-two-extra-public-investment-crowds-in-private-investment> on 5 June 2023.

²¹ Glocker et al (2019): Time-varying government spending multipliers in the UK, Journal of Macroeconomics vol. 60. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0164070418301642> on 8 June 2023.

²² International Monetary Fund (2021): Uncertainty and Public Investment Multipliers: The Role of Economic Confidence. Available at: <https://www.imf.org/en/Publications/WP/Issues/2021/11/12/Uncertainty-and-Confidence>

analysis of 11 Eurozone countries between 1970 and 2016 to estimate the level of fiscal multipliers²³. They found that fiscal multipliers tend to be larger than one and that public investment leads to a permanent and persistent effect on the level of output.

4.3 Approach to estimating the benefits

The benefits are simply calculated as the level of public investment multiplied by two (following the findings of Matvejevs & Tkacev (2023)). These reflect the value of the investment, not the benefits that would be generated from that investment. If the benefits from the investment are greater than the value of the investment, then the benefits to Lowestoft from the flood barrier enabling and attracting future investment will be under-estimated.

4.4 Sensitivity analysis

Evidence on multipliers applied to public investment is somewhat scarce but seems to support the assumption that public investment could work as an enabler for additional, follow-on investment. Given the Lowestoft is a town requiring investment, it could be assumed that the public investment in the flood barrier would have greater impact (similar to the findings on investment in recessionary periods). Thus, the multiplier could be greater than two, further increasing the benefit-cost ratio from investment in flood barrier.

[Public-Investment-Multipliers-The-Role-of-Economic-Confidence-506825#:~:text=In%20theory%2C%20uncertainty%20can%20reduce,lead%20to%20larger%20private%20spending](#) on 6 June 2023.

²³ Deleidi et al (2019): Public investment fiscal multipliers: An empirical assessment for European countries. Available at: https://www.ucl.ac.uk/bartlett/public-purpose/sites/public-purpose/files/final_working_paper_deleidi_iafrate_levrero_19_aug.pdf on 6 June 2023.

5 Attributing benefits

5.1 Summary of findings

The potential linkages of the flood barrier to the different Government Departments are set out in Section 5.2, with the benefits they could each realise then summarised in Section 5.3. Table 5-1 below summarises which departments would benefit and why. BEIS is omitted from the table as it no longer exists; instead reference is included to the Department for Business and Trade (DBT) and Department for Energy Security and Net Zero (DESNZ).

Table 5-1: Government departments benefiting from the Lowestoft flood barrier	
Department benefiting	How the flood barrier could benefit each Department
DBT	Underpins increased business growth and trade (especially via port)
Defra	Underpins increased levels of walking and cycling helping to improve air quality and reduce greenhouse gas emissions Reduces flood risk
DESNZ	Supports growth in offshore wind energy through realisation of port investments Helps deliver net zero by enabling growth in offshore wind industry, and providing port support to Sizewell C
DfT	Ensures improved transport connectivity by reducing flood risk to access roads to Gull Wing bridge
DHULC	Underpins economic growth and jobs in relatively deprived area helping to level up Underpins connectivity in transport connections, including at port Enables increased pride in place by enabling investment benefits to be realised and town to develop and improve
DWP	Underpins increased employment and provision of high quality/skilled jobs from
HM Treasury	Demonstrates value for money from public investment and enables investments already made (which in many cases are predicated on the flood barrier being constructed)
Homes England	Reduces flood risk to existing properties Underpins increased opportunities for development of high quality properties

5.2 Summary of evidence reviewed

The government departments relevant to the Lowestoft flood barrier were analysed to find their visions and priority outcomes. These were then mapped against the benefits of the project to highlight how the flood barrier would help those departments to meet their objectives.

In Table 5-2, the UK government departments' vision and priority outcomes are laid out. It must be noted that BEIS (Department for Business, Energy & Industrial Strategy) no longer exists and has been succeeded by the DESNZ (Department for Energy and Net Zero) and Department for Business and Trade (DBT).

Table 5-2: Government department visions and priority outcomes

Government department	Vision	Priority outcomes
Defra (Department for Environment, Food & Rural Affairs)	To make our air purer, our water cleaner, our land greener and our food more sustainable	<ul style="list-style-type: none"> • Improve the environment through cleaner air and water, minimised waste, and thriving plants and terrestrial and marine wildlife (this is a cross-cutting outcome, with Ministry of Housing, Communities and Local Government (MHCLG) and Department for Transport (DfT) as contributing departments); • Reduce greenhouse gas emissions and increase carbon storage in the agricultural, waste, peat, and tree planting sectors to help deliver net zero (this outcome reflects Defra’s contribution to the Department for Business, Energy and Industrial Strategy (BEIS)-led cross-cutting net zero outcome); • Reduce the likelihood and impact of flooding and coastal erosion on people, businesses, communities, and the environment; and • Increase the sustainability, productivity and resilience of the agriculture, fishing, food, and drink sectors, enhance biosecurity at the border and raise animal welfare standards.
BEIS (Department for Business, Energy & Industrial Strategy)	To building a stronger, fairer, and greener future across the UK, fostering shared prosperity, growth and levelling up across our Union	<ul style="list-style-type: none"> • Fight coronavirus by helping businesses to bounce back from the impacts of COVID-19, supporting a safe return to the workplace and accelerating the development and manufacture of a vaccine; • Tackle climate change: reduce UK greenhouse gas emissions to net zero by 2050. (Cross-cutting outcome also supported by DEFRA, DfT, DHCLG and HMT); • Unleash innovation and accelerate science and technology throughout the country to increase productivity and UK global influence; and • Back long-term growth: boost enterprise by making the UK the best place in the world to start and grow a business.
DHLUC (Department for Levelling Up, Housing and Communities)	<i>No vision mentioned, but the About Us said, The Department for Levelling Up, Housing and Communities supports communities across the UK to thrive, making them great places to live and work</i>	<ul style="list-style-type: none"> • To increase pay, employment, and productivity in every part of the UK, with each containing “a globally competitive city” and a smaller gap between top performing and other areas; • Public transport connectivity across the UK to be “significantly closer to the standards of London” including integrated ticketing and simpler fares; • A “significant” increase in primary school children reaching expected standards in reading, writing and maths. For England – education policy is devolved – this will mean at least 90% meeting expected standards, with at least a one-third increase for this metric in the worst performing areas; • A “significant” rise in the numbers completing high-quality skills training across the UK. In England, the target is for 200,000 more doing this, including 80,000 in the lowest skilled areas; • A narrowing in healthy life expectancy between the UK areas where it is highest and lowest, with the overall average healthy life expectancy rising by five years by 2035;

Table 5-2: Government department visions and priority outcomes

Government department	Vision	Priority outcomes
		<ul style="list-style-type: none"> • An improvement in perceived wellbeing in all parts of the UK, with a narrowed gap between areas with the highest and lowest levels; • A rise across the whole UK of “pride in place”, defined as “people’s satisfaction with their town centre and engagement in local culture and community”, with a narrowing of gaps between areas with the highest and lowest levels; • An increase in the number of first-time home buyers in all UK areas. The “ambition” is for a 50% fall in the number of rented homes deemed non-decent, including the biggest improvements in worst-performing areas; • An overall fall in homicide, serious violence, and neighbourhood crime, focused on worst-affected areas; and • A devolution deal for “every part of England that wants one”, with powers “at or approaching the highest level of devolution and a simplified, long-term funding settlement”.²⁴
DfT (Department for Transport)	No vision. Website to say to refer to priority outcomes.	<ul style="list-style-type: none"> • Improve connectivity across the UK and grow the economy by enhancing the transport network, on time and on budget. • Build confidence in the transport network as the country recovers from COVID-19 and improve transport users’ experience, ensuring that the network is safe, reliable, and inclusive. • Tackle climate change and improve air quality by decarbonising transport (this outcome reflects DfT’s contribution to the BEIS-led cross-cutting net zero outcome).²⁵
Homes England	To intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability. We’ll make this sustainable by creating a	<ul style="list-style-type: none"> • Unlock public and private land where the market will not, to get more homes built where they are needed; • Ensure a range of investment products are available to support housebuilding and infrastructure, including more affordable housing and homes for rent, where the market is not acting; • Improve construction productivity; • Create a more resilient and competitive market by supporting smaller builders and new entrants, and promote better design and higher quality homes; • Offer expert support for priority locations, helping to create and deliver more ambitious plans to get more homes built; and

²⁴HM Government (2022) Levelling Up White Paper. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095544/Executive_Summary.pdf on 25 May 2023.

²⁵ GOV.UK (2023): About us – Department for Transport. Available at: <https://www.gov.uk/government/organisations/department-for-transport/about> on 25 May 2023.

Table 5-2: Government department visions and priority outcomes		
Government department	Vision	Priority outcomes
	more resilient and diverse housing market	<ul style="list-style-type: none"> Effectively deliver home ownership products, providing an industry standard service to consumers.²⁶
DWP (Department for Work and Pensions)	To improve people's quality of life, both now and in the future	<ul style="list-style-type: none"> Maximise employment across the country to aid economic recovery following COVID-19; Improve opportunities for all through work, including groups that are currently under-represented in the workforce; Address poverty through enabling progression in the workforce and increasing financial resilience; and Deliver a reliable, high-quality welfare and pensions system which customers have confidence in.²⁷
DESNZ (Department for Energy Security and Net Zero)	<i>No vision mentioned, but the About Us said they are securing our long-term energy supply, bringing down bills and halving inflation</i>	<ul style="list-style-type: none"> Ensure security of energy supply this winter, next winter and in the longer-term – bringing down energy bills and reducing inflation. Ensure the UK is on track to meet its legally binding Net Zero commitments and support economic growth by significantly speeding up delivery of network infrastructure and domestic energy production. Improve the energy efficiency of UK homes, businesses, and public sector buildings to meet the 15% demand reduction ambition. Deliver current schemes to support energy consumers with their bills and develop options for long-term reform to improve how the electricity market works for families and businesses. Seize the economic benefits of Net Zero, including the jobs and growth created through investment in new green industries. Pass the Energy Bill to support the emerging CCUS and hydrogen sectors; to update the governance of the energy system; and to reduce the time taken to consent offshore wind.²⁸

²⁶ Homes England (2022): Homes England strategic plan 2018 to 2023. Available at: <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223/homes-england-strategic-plan-2018-to-2023#our-mission-and-objectives> on 25 May 2023.

²⁷ DWP (2021): Department for Work and Pensions Outcome Delivery Plan: 2021 to 2022. Available at: <https://www.gov.uk/government/publications/department-for-work-and-pensions-outcome-delivery-plan/department-for-work-and-pensions-outcome-delivery-plan-2021-to-2022> on 25 May 2023.

²⁸ GOV.UK (2023) About us – Department for Energy Security & Net Zero. Available at: <https://www.gov.uk/government/organisations/department-for-energy-security-and-net-zero/about> on 25 May 2023.

5.3 Approach to attributing the benefits

There are clearly a multitude of benefits stemming from the investments that are happening in Lowestoft and are planned for the future. These investments are taking place in-line with the visions and the priority outcomes of numerous governmental departments.

5.3.1 Port investment

Investment in the port of Lowestoft through Project LEEF is expected to deliver £1.72 billion in additional GVA over a period of 60 years (three berths). This is predicted to deliver 707 additional jobs on average per year. The investment is clearly linked to the priority outcomes of the Department of Energy Security and Net Zero (DESNZ), particularly their aims to “Seize the economic benefits of Net Zero, including the jobs and growth created through investment in new green industries”. The development of the LEEF project, will be vital in realising the benefits of the transition to a Net Zero economy especially in Lowestoft and the local area.

The LEEF project is also linked to other priority objectives, particularly those related to the environment. Defra are supporting priority outcomes of other departments, such as BEIS’ aim to reduce UK greenhouse gas emissions to net zero by 2050. Working towards net zero, will also have knock-on impacts on Defra’s other objectives, such to “Improve the environment through cleaner air and water, minimised waste, and thriving plants and terrestrial and marine wildlife”. There are also benefits to the DHLUC’s twelve missions such as the first which aims “to increase pay, employment and productivity in every part of the UK”. The investment in the port would also indirectly contribute to other missions from the DHLUC such as:

- A “significant” rise in the numbers completing high-quality skills training across the UK. In England, the target is for 200,000 more doing this, including 80,000 in the lowest skilled areas; and
- An improvement in perceived wellbeing in all parts of the UK, with a narrowed gap between areas with the highest and lowest levels.

The port investment would also contribute to employment in the area. Project LEEF is projected to deliver 707 additional jobs on average per year, of which many will be high skilled. This contributes to the DWP’s priority outcome of to “Maximise employment across the country to aid economic recovery following COVID-19”.

The large-scale investment in the port of Lowestoft will lead to a multitude of benefits for government departments such as BEIS, DESNZ and Defra’s aims to reach net zero, the DHLUC’s aim to “level-up” the country, and the DWP’s aim to increase the number of high quality jobs.

5.3.2 Town investment

Lowestoft has an ambitious Town Investment Plan. The implementation of this plan will have a multitude of benefits if it is realised. A total of 54ha of land will be regenerated and 14,800 dwellings will be created. This investment will contribute to a series of governmental priority outcomes, particularly those from the DHLUC. Lowestoft has received funding from the DHLUC’s Towns Fund so they already working towards the department’s objectives. Linked to this the building of houses will contribute to the aims of Homes England. Particularly considering that the plan is expected to unlock £350 million of private investment. It must be noted that the Town Investment Plan is predicated on the creation of a flood barrier and that the GVA benefits would not be realised without it.

An important aspect of the Town Investment Plan is to encourage active and sustainable methods of transport that in turn are expected to improve connectivity, increase footfall, and reduce journey times. This is also important to the DfT that is both seeking to improve connectivity and improve air quality by decarbonising transport. Realisation of the Lowestoft's Town Investment Plan will help them move towards these goals.

5.3.3 Transport investment

The creation of a third bridge is vital for the connectivity of Lowestoft. It clearly works towards the priority outcomes of the DfT, especially as its construction is being partly financed by the department. Outside of the DfT, the bridge's construction will contribute to the aims of the DHLUC, such as:

- Public transport connectivity across the UK to be “significantly closer to the standards of London”; and
- A rise across the whole UK of “pride in place”, defined as “people’s satisfaction with their town centre and engagement in local culture and community”, with a narrowing of gaps between areas with the highest and lowest levels.

There are also environmental benefits to the scheme. The bridge is expected to increase the levels of walking and cycling in Lowestoft, which will contribute to Defra’s aims to improve air quality and reduce greenhouse gas emissions.

Annex 1 Sources used

ABP (2021): ABP unveils ambitious vision for Port of Lowestoft in support of SNS energy sector, 25 March 2021. Available at: <https://www.abports.co.uk/news-and-media/latest-news/2021/abp-unveils-ambitious-vision-for-port-of-lowestoft-in-support-of-sns-energy-sector/> on 17 May 2023.

ABP (2021): Vision for the Port of Lowestoft (2020-2050). Available at: <https://vision.abpmer.net/lowestoft-masterplan/> on 17 May 2023 (downloaded from: <https://vision.abpmer.net/lowestoft-masterplan/resources/downloads/ABPLowestoftMasterplan.pdf>)

ABP (2022): ABP awards design and build contract for Lowestoft Eastern Energy Facility, 21 November 2022. Available at: <https://www.abports.co.uk/news-and-media/latest-news/2022/abp-awards-design-and-build-contract-for-lowestoft-eastern-energy-facility/> on 17 May 2023.

Aerts CJH (2019): The macroeconomic impacts of future river flooding in Europe, Environmental Research Letters, Volume 14 (8). Available at: <https://iopscience.iop.org/article/10.1088/1748-9326/ab3306/meta> on 8 June 2023.

Akay A et al (2021): Life satisfaction, pro-activity, and employment, GLO Discussion paper No 784, Global Labor Association, Essen. Available at: <https://www.econstor.eu/bitstream/10419/230522/1/GLO-DP-0784.pdf> on 7 June 2023. Data based on statistics from 1984 to 2009.

Building Partnerships Limited (2020): Kirkley Waterfront Regeneration Feasibility Study – A report for East Suffolk Council, August 2020.

Byrnelooby (nd): Lowestoft Eastern Energy Facility (LEEF). Available at: <https://www.byrnelooby.com/projects/lowestoft-eastern-energy-facility> on 17 May 2023.

Cumbria County Council (2018): Flooding in Cumbria, December 2015, Impact Assessment. Available at: <https://cumbria.gov.uk/elibrary/Content/Internet/536/671/4674/17217/17225/43312152830.PDF> on 8 June 2023.

Deleidi et al (2019): Public investment fiscal multipliers: An empirical assessment for European countries. Available at: https://www.ucl.ac.uk/bartlett/public-purpose/sites/public-purpose/files/final_working_paper_deleidi_iafrate_levrero_19_aug.pdf on 6 June 2023.

Department for Transport (2020): Application for the proposed Lake Lothing Third Crossing development consent order. Available at: <https://gullwingbridge.co.uk/wp-content/uploads/2021/02/LLTC-SoS-Decision-letter.pdf> on 26 May 2023.

DWP (2021): Department for Work and Pensions Outcome Delivery Plan: 2021 to 2022. Available at: <https://www.gov.uk/government/publications/department-for-work-and-pensions-outcome-delivery-plan/department-for-work-and-pensions-outcome-delivery-plan-2021-to-2022> on 25 May 2023.

East Suffolk Council (2019): Waveney Local Plan. Available at: <https://www.eastsuffolk.gov.uk/assets/Your-Council/WDC-Council-Meetings/2019/March/Council-20-03-19/Item-11-APPENDIX-A-Waveney-Local-Plan.pdf> on 23rd May 2023.

East Suffolk Council (2020): Lowestoft Town Centre Masterplan. Available at: <https://www.eastsuffolk.gov.uk/assets/Business/Regeneration-projects/Lowestoft-Town-Centre-Masterplan.pdf> on 19 May 2023.

East Suffolk Council (2021): Town Investment Plan: Lowestoft. Available at: <https://www.eastsuffolk.gov.uk/assets/Business/Regeneration-projects/Lowestoft-Investment-Plan/Lowestoft-Town-Investment-Plan.pdf> on 19 May 2023.

Glocker et al (2019): Time-varying government spending multipliers in the UK, Journal of Macroeconomics vol. 60. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0164070418301642> on 8 June 2023.

GOV.UK (2023) About us – Department for Energy Security & Net Zero. Available at: <https://www.gov.uk/government/organisations/department-for-energy-security-and-net-zero/about> on 25 May 2023.

GOV.UK (2023): About us – Department for Transport. Available at: <https://www.gov.uk/government/organisations/department-for-transport/about> on 25 May 2023.

HM Government (2022) Levelling Up White Paper. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095544/Executive_Summary.pdf on 25 May 2023.

HM Treasury (2021): Welling guidance for appraisal: Supplementary Green Book guidance. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005388/Wellbeing_guidance_for_appraisal_-_supplementary_Green_Book_guidance.pdf on 7 June 2023.

Homes England (2022): Homes England strategic plan 2018 to 2023. Available at: <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223/homes-england-strategic-plan-2018-to-2023#our-mission-and-objectives> on 25 May 2023.

International Monetary Fund (2021): Uncertainty and Public Investment Multipliers: The Role of Economic Confidence. Available at: <https://www.imf.org/en/Publications/WP/Issues/2021/11/12/Uncertainty-and-Public-Investment-Multipliers-The-Role-of-Economic-Confidence-506825#:~:text=In%20theory%2C%20uncertainty%20can%20reduce,lead%20to%20larger%20private%20spending> on 6 June 2023.

Jacobs (2022): Lowestoft Tidal Economics for OBC 2022, Revision P01, 14 September 2022, Appendix E1 to the OBC.

Luhmann M et al (2012): Subjective well-being and adaptation to life events: a meta-analysis on differences between cognitive and affective well-being, J Pers Soc Psychol, 102(3), 592-615. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3289759/> on 7 June 2023.

Matvejevs & Tkacev (2023): Invest One – Get Two Extra: Public Investment Crowds in Private Investment, SUERF Policy Brief No 499. Available at: <https://www.suerf.org/suer-policy-brief/59417/invest-one-get-two-extra-public-investment-crowds-in-private-investment> on 5 June 2023.

Mendoza-Tinoco D et al (2017): Flood footprint of the 2007 floods in the UK: The case of the Yorkshire and the Humber region. Journal of Cleaner Production, 168, 655-667. Available at: <https://www.sciencedirect.com/science/article/pii/S0959652617320048> on 8 June 2023.

Mott Macdonald (2022): Lowestoft Flood Risk Economic Footprint and Impact Report, May 2022, Appendix F3 to the OBC.

Nikolova M et al (2020): Losing your own business is worse than losing a salaried job. Available at: <https://www.brookings.edu/blog/up-front/2020/05/07/losing-your-own-business-is-worse-than-losing-a-salaried-job/> on 7 June 2023.

Opergy & Metro Dynamics (2021): Economic impact assessment of the Lowestoft Eastern Energy Facility (LEEF) project, July 2021.

Somerset Rivers Authority (2015): Somerset Economic Impact Assessment of the Winter 2013/14 flooding, report by Parsons Brinkerhoff. Available at: <http://www.somersetiversauthority.org.uk/wp-content/uploads/2018/06/22-July-2015-ITEM-8-Economic-Impact-Assessment-full-report.pdf> on 8 June 2023.

Suffolk County Council (2020): Cabinet Meeting – Lake Lothing Third Crossing – The next steps – update and approval to proceed to the construction phase. Available at: <https://gullwingbridge.co.uk/wp-content/uploads/2021/01/Agenda-Item-6-Lake-Lothing-Third-Crossing-aE-The-next-steps-aE-update-and-approval-to-proceed-to-the-construction-phase-4.pdf> on 26 May 2023.

The Planning Inspectorate (2019): Lake Lothing Third Crossing – Examining Authority’s Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport. Available at: <https://gullwingbridge.co.uk/wp-content/uploads/2021/02/LLTC-Examining-Authority-Report.pdf> on 26 May 2023.



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Lowestoft Flood Protection Timeline





FULL COUNCIL

Wednesday, 22 November 2023

Subject	APPOINTMENT OF CHIEF FINANCE OFFICER AND SECTION 151 OFFICER
Cabinet Member	Councillor Caroline Topping, Leader of the Council
Report Author(s)	Chris Bally Chief Executive chris.bally@eastsoffolk.gov.uk 01502 523210

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	N/A
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

Local authorities are required to have in place certain statutory officers, one of which is the Section 151 Officer, known in East Suffolk as the Chief Financial Officer, who undertakes a range of key financial responsibilities.

In March 2023, the former postholder, Brian Mew, retired and Full Council agreed to appoint Mrs Lorraine Rogers as the Acting Chief Finance Officer and Section 151 Officer pursuant to a full recruitment process being undertaken once the financial year end processes had been completed. Mrs Lorraine Rogers was formerly the Deputy Section 151 Officer.

The recruitment process is now complete and this report seeks Full Council's approval to appoint Mrs Lorraine Rogers as the Council's permanent Chief Finance Officer and Section 151 Officer.

Options:

Section 151 of the Local Government Act 1972 requires that every local authority shall make arrangements for the proper administration of their financial affairs and appoint one of their officers to have responsibility for the administration of those affairs. The Chief Finance Officer and Section 151 Officer is one of three statutory roles which the Council must have in place, the others being the Head of Paid Service and the Monitoring Officer. Since the Chief Finance Officer and Section 151 Officer is a statutory role, the Council has no option but to ensure the role is filled.

Recommendation/s:

That Full Council approve the appointment of Mrs Lorraine Rogers as its Chief Finance Officer and Section 151 Officer and the officer responsible for the administration of the Council's finances under Section 151 of the Local Government Act 1972.

Corporate Impact Assessment

Governance:

The Chief Finance Officer and Section 151 Officer is responsible for the proper administration of the financial affairs of the Council which includes ensuring the lawfulness and financial prudence of the Council's decision-making, the administration of its financial affairs, contributing to the corporate management of the Council and the provision of financial information and advice. The Chief Finance Officer and Section 151 Officer is therefore integral to the day-to-day operation of the Council as well as being a statutory officer.

ESC policies and strategies that directly apply to the proposal:

The Council's Constitution refers to the role and remit of the Chief Finance Officer and Section 151 Officer.

Environmental:

No impact.

Equalities and Diversity:

The postholder ensures that the Council remains financially viable and has a fully sustainable funding position in order to be able to provide a full and effective range of services to all communities across the district.

Financial:

The Chief Finance Officer and Section 151 Officer is responsible for ensuring that the Council meets legislative requirements and adheres to the Finance Procedure Rules as set out in the Constitution

Human Resources:

No impact.

ICT:

No impact.

Legal:

The Council is required to appoint a Chief Finance Officer and Section 151 Officer in accordance with Section 151 of the Local Government Act 1972.

Risk:

Failure to appoint a Chief Finance Officer and Section 151 Officer would be contrary to Section 151 of the Local Government Act 1972 and the Council's Constitution

External Consultees: None

Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>

XXX	Governance		
XXX	How ESC governs itself as an authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected?			
<p>The postholder is responsible for the proper administration of the financial affairs of the Council which includes ensuring the lawfulness and financial prudence of the Council's decision-making, the administration of financial affairs, contributing to the corporate management of the Council and the provision of financial information and advice. In essence, the postholder is responsible for ensuring the Council remains financially viable and able to deliver effective services to all of its communities across the district.</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	The Chief Finance Officer and Section 151 Officer role is a statutory requirement in accordance with the legislation referred to above.
2 Current position	
2.1	Mrs Lorraine Rogers was appointed by Full Council as Acting Chief Finance Officer and Section 151 Officer from 1 April 2023 following retirement of the then postholder on 31 March 2023.
2.2	Full Council approved this temporary position pending a full recruitment process once the financial year end procedures had been completed.
3 How to address current situation	
3.1	The formal recruitment process began in September 2023 and interviews took place on 13 October 2023 involving a cross party panel of Members. In accordance with the Council's Constitution, an Appointments Committee was convened on 23 October 2023.
4 Reason/s for recommendation	
4.1	The appointment of a Chief Finance Officer and Section 151 Officer is a statutory requirement and the proposal contained within this report will ensure that the Council is compliant with legislation.
4.2	Mrs Lorraine Rogers is an officer with significant local government experience. She was the Council's Deputy Chief Finance Officer and Section 151 Officer for a number of years prior to taking on the full role in April 2023. She has worked for East Suffolk Council and its predecessor councils for 25 years and is a member of the Association of Chartered Certified Accountants.

Appendices

Appendices:

None

Background reference papers:

None



FULL COUNCIL
Wednesday, 22 November 2023

Subject	East Suffolk Council’s Food and Health & Safety Service Plan 2023-2024
Cabinet Member	Councillor Jan Candy Cabinet Member with responsibility for Community Health
Report Author(s)	Catherine Hickling Lead Food and Safety Officer catherine.hickling@eastsuffolk.gov.uk 07827 820506
Head of Service	Fiona Quinn Head of Environmental Services and Port Health fiona.quinn@eastsuffolk.gov.uk 07385 948900
Director	Nick Khan Strategic Director Nick.khan@eastsuffolk.gov.uk 07748 012901

Is the report Open or Exempt?	OPEN
Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable.
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

The Council is required to produce a service plan for its food and health & safety regulatory functions, in a format prescribed by

- for food and imported food, the Food Standards Agency in its Framework Agreement on Official Feed and Food Controls by Local Authorities, and
- for health & safety, the Health and Safety Executive, as set out in the National Local Authority Enforcement Code – Health & Safety at Work England, Scotland and Wales.

East Suffolk Council operates Suffolk Coastal Port Health Authority (SCPHA) and therefore official controls carried out by SCPHA are also included.

Given close linkages to the Corporate Health & Safety Team, the work of this team is also included.

This service plan combines the above in a single plan which must be submitted for member approval. It identifies the council's performance against the previous service plan (2021/2023), any variance from it and areas for improvement

Options:

The plan may be approved with or without amendments being required.

Recommendation/s:

It is recommended that Full Council:

1. notes performance against the service plan for 2021/23, and
2. considers and comments on the service plan for 2023/24, and
3. approves the service plan for 2023/24,
4. delegates authority to the Head of Environmental Services and Port Health to make any minor changes to the service plan for 2023/24 required as a result of legislative updates, typographical errors or to address formatting issues.

Corporate Impact Assessment

Governance:

Regular Community Health Briefings will be held with the Cabinet Member with responsibility for Community Health. Performance against targets is reported in the Service Plan for 2023/24, including summaries of annual reporting to the Food Standards Agency Local authority end of year return and the Health and Safety Executive's LA intervention and enforcement activity return.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Strategic Plan 2020-2024

East Suffolk Economic Strategy 2022 – 2027

East Suffolk Environmental Policy to 2023

Environmental:

The service plan includes a section on Caring for our Environment and takes into account East Suffolk's environmental policy objective to be an exemplar in efficient and responsible use of natural resources.

Equalities and Diversity:

An Equality Impact Assessment (Reference: EQIA557035880) has been undertaken for the plan: no mitigation action identified.

Financial:

There are no new financial implications for the council from the proposals within the service plan. Targets and service improvements will be met from budgets already approved for the delivery of the services in 2023/24.

Human Resources:

No resource implications for the recommendation included in this report.

ICT:

No resource implications for the recommendation included in this report.

Legal:

No resource implications for the recommendation included in this report.

Risk:

Delivery of the types of functions set out in the service plan are well established, planned and monitored against the Food Law Code of Practice and relevant national and corporate requirements. The service can flex and adapt in response to changing expectations and demands.

External Consultees:

An online consultation process on a draft of the service plan has taken place, involving business associations and networks, food businesses and publicly via the council's social media channels. No views were received that were unsupportive of the contents of the service plan.

Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input checked="" type="checkbox"/>
How does this proposal support the priorities selected?			
Public health and safety is protected, including through regulatory services.			

Background and Justification for Recommendation

1 Background facts	
1.1	<p>The Food Standards Agency's Framework Agreement and the Health and Safety Executive's National Local Authority Enforcement Code require the council to review its performance against the 2021/23 Food and Health & Safety Service Plan, identify any variance from the plan and areas for service improvement.</p> <p>As well as reviewing past performance, the council is also required to approve a new Food and Health and Safety Service Plan for 2023/24 (Appendix A).</p> <p>The content and layout of the plan follows the Framework Agreement with appendices providing data and more detailed information relevant to it.</p> <p>Review of performance, identification of any variation from the previous plan and areas of required improvement are set out in the review section on pages 52 to 58. A section on caring for our environment is at page 59.</p> <p>Throughout 2021/23 the Food and Safety Team worked conscientiously and at a faster pace to meet the expectations of the FSAs post covid pandemic Recovery Plan. The team achieved a high level of performance against the Recovery Plan, and this is reported in detail on page 24 and in appendix 6 on page 68.</p>
2 Current position	
2.1	<p>Suffolk Coastal Port Health Authority: The final Border Target Operating Model (BTOM) sets out a new approach to controls at the border. This will introduce changes in the rules for bringing food into the UK from the EU after 31 January 2024. Our Port Health Team may see an increase in the number and frequency of checks it performs.</p>
2.2	<p>Food and Safety Team: Recently recruited staff, who are new to the profession, require ongoing support and training. This requires input from more experienced officers. Filling vacant posts continues to be a challenge. Both issues are having an impact on meeting Food Standards Agency targets.</p>
3 How to address current situation	
3.1	<p>Suffolk Coastal Port Health Authority: A report was submitted to Full Council on 27 September 2023 outlining the challenges and opportunities of the final BTOM. SCPHA may need to increase the size of its workforce as the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods as part of its Border Target Operating Model (BTOM).</p>

3.2	<p>Food and Safety Team:</p> <p>Recently recruited staff are progressing very well and the current level of support provided is expected to reduce over time. Recruitment remains a priority. Service delivery is being supported by temporary contractors. Our environmental health degree apprentices are expected to qualify in approximately two years' time.</p>
-----	--

4 Reason/s for recommendation	
4.1	The Council is required to produce and submit a Food and Health and Safety Service Plan for member approval.

Appendices

Appendices:	
Appendix A	Draft East Suffolk Food and Health & Safety Service Plan 2023/24.

Background reference papers:		
Date	Type	Available From
2010	FSA Framework Agreement on Official Feed and Food Controls by Local Authorities.	environment@eastsoffolk.gov.uk
Refer to online document.	HSE National Local Authority Enforcement Code Health and Safety at Work.	https://www.hse.gov.uk/lau/la-enforcement-code.htm
06/06/2023	Equality Impact Assessment Reference: EQIA557035880.	environment@eastsoffolk.gov.uk



EASTSUFFOLK COUNCIL

Food and Health & Safety Service Plan 2023/24

Foreword

On behalf of East Suffolk Council, it is my privilege as Cabinet Member for Community Health to present this service plan for Food Safety, Health and Safety and Port Health Services.

At the heart of our community is the health and safety of the people we serve. It is imperative that we provide a robust framework which reflects our unwavering dedication to enabling public health and enhancing the quality of life for all. This plan serves as a comprehensive road map that outlines our commitment to ensuring the highest standards are achieved.

The content of the plan reflects the Food Standards Agency's service planning requirements of us as a local authority and includes our responsibilities for delivering official food controls, both inland and at our seaports by our Food and Safety Team and Suffolk Coastal Port Health Authority based in Felixstowe. The health, safety and well-being of our local authority workforce is paramount and for that reason we include the important work of our Corporate Health and Safety Team.

Many of the digital adaptations to our services made during the COVID-19 pandemic have proven to be successful and we have retained them as permanent methods of working. By using 'paperless' work procedures and utilising a more responsive communications model we are minimising the amount of travel by our staff and contributing to a cleaner, healthier environment for all.

Our colleagues at Suffolk Coastal Port Health Authority (SCPHA) have been working hard to ensure checks on food entering the UK through the Port of Felixstowe, Harwich International Port and the Port of Ipswich are carried out efficiently, and that the UK's food supply chain is protected. Changes in the rules for bringing food into the UK from the EU means that our Port Health Team may see an increase in the number and frequency of checks it performs after October 2023. In response, a sophisticated update to the system used to track, manage, process and record food imports is currently being developed by SCPHA's team which will ensure that food passing through the UK's largest container port continues to reach its destination on time.

I applaud all those who have contributed to the successes set out in this plan. Our achievements would not be possible without the dedication and expertise of our East Suffolk Council and Suffolk Coastal Port Authority staff and the commitment of our hard-working businesses, our partner organisations and all those who work so diligently all year round.



Cllr Jan Candy

Cabinet Member for
Community Health

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Acknowledgments

This service plan would not have been possible without the dedication and expertise of Mark Sims, former Food and Safety Manager at East Suffolk Council.

Mark retired in April 2023 following a distinguished 43-year career with Suffolk Coastal, Waveney and East Suffolk Council.

We wish him a very happy retirement.

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1.0 Service Aims

1.1 Aims

Food and Health & Safety

The Food and Safety Team aims:

- To ensure food businesses have adequate arrangements in place to enable safe and hygienic food production and handling.
- To control the spread of infectious diseases through the investigation of cases and outbreaks.
- To secure and maintain a safe and healthy environment in those establishments for which we have health and safety enforcement responsibility.
- To support businesses by providing food export health certification.
- To provide advice and assistance to businesses and consumers.
- To ensure healthier environments where everyone can socialise, relax, travel, shop and work free from any second-hand smoke.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) aims to uphold the protection of public and animal health, as well as controls on organic products and illegal, unreported and unregulated fishing, as one of the UK's biggest port health authorities. It achieves this by performing essential checks on food, feed and animal-origin products imported to the Port of Felixstowe, Harwich International Port and the Port of Ipswich for entry into the UK. This is in addition to carrying out ship sanitation certification and infectious disease controls, contributing to Britain's biosecurity measures at the border.

SCPHA also aims to continue combatting the spread of African Swine Fever in a joint operation with Border Force, which has seen over one tonne of illegal pork seized from traffic entering the ports of Harwich and Felixstowe.

Corporate Health and Safety

The Corporate Health and Safety Team aims to provide competent advice, guidance, support and training in matters relating to health and safety in respect of all the council's employees, activities and workplaces. This enables the council to comply with its legal obligation to ensure, so far as is reasonably practicable, the health, safety and welfare of all its employees and the health and safety of anyone who might be affected by the council's activities.

Food and Health & Safety

The primary work of the Food and Safety Team is to deliver official food controls and other enforcement activities. It is therefore advisory as well as regulatory. Effective regulation, using digital reports and communication, supports compliant businesses to thrive, which creates a level playing field for business, boosts the economy and provides safe employment in East Suffolk. These factors contribute to the council's Strategic Plan.



Suffolk Coastal Port Health Authority



The work of Suffolk Coastal Port Health Authority (SCPHA) is delivered separately to the inland responsibilities of the Food and Safety Team, however it is still part of the official controls landscape. At the border, official controls dovetail with biosecurity and the wider protection of public and animal health.

Corporate Health and Safety

The Corporate Health and Safety Team works across the whole council to assist teams in every service area to work safely. This enables others to support the council's objectives. Good health and safety culture reduces staff absence and improves the organisation's overall resilience and business continuity.



2.0 Background

2.1 Profile of the Local Authority

The profile of East Suffolk is set out in our Economic Strategy 2022 – 2027.

Located on the east coast of England, East Suffolk is a diverse local economy, with both outstanding economic assets and potential, and in some areas, continuing regeneration challenges.

East Suffolk has a population of 248,000 with 81,000 people living in the north around Lowestoft, 25,000 living in the south around Felixstowe and about 3,000-10,000 living in market towns such as Woodbridge, Leiston, Framlingham, Saxmundham, Beccles, and Bungay, which are distributed across the middle of the district.

Micro and small businesses are found in abundance across the area. There are over 9,500 businesses within East Suffolk and the vast majority of these are small (fewer than 10 employees). In addition, there is a high incidence of self-employment, particularly in the south of the area. Throughout, the role of micro and small businesses in sustaining the fabric of economic life across East Suffolk is critical.

Alongside micro and small businesses, firms that have grown to at least medium size must be acknowledged. They act as anchors for their local communities, support local supply chains and represent opportunities for sustainable growth which can result in creation of employment opportunities for residents. They are often local, family-owned businesses and although not well known outside of East Suffolk, within it, their role is crucial. The area also hosts important economic assets and offers opportunities that are amongst the most significant in the UK.

These include: The Port of Felixstowe - the UK's busiest container port; Adastral Park; BT's Global Research and Development Headquarters; The Centre for Environment, Fisheries and Aquaculture Science (CEFAS) - an executive agency of the Department for Environment, Food and Rural Affairs; The Port of Lowestoft - a key location for the offshore clean energy industry; The East Anglia Array (including East Anglia ONE); and Sizewell (including the proposed Sizewell C - Europe's largest infrastructure project).

The natural capital in the district supports a very distinctive and diverse visitor economy. This includes traditional seaside tourism, major festivals and events, attractions in market/coastal towns, outstanding landscapes, renowned heritage assets and a growing range of quality cultural/heritage activities. However, the economic asset represented by the visitor economy will be compromised if the natural capital represented by the beautiful environment is not protected while being enjoyed. Together, they demand attention and require careful management to develop their full potential in economic terms.

Food and Health & Safety

East Suffolk's historical agricultural and fishing heritage provides a welcome backdrop for many national and international food and drink companies based here. This sector is an important employer in rural areas and includes seasonal and migrant workers. Specialisms include the production and processing of pork, poultry, wines, beer, spirits, chocolate, sauces, yeast, ice cream, smoked fish, shellfish and dairy products. East Suffolk's leisure and visitor economy supports many hospitality, catering and retail food businesses.

Suffolk Coastal Port Health Authority

Primarily based at the Port of Felixstowe, Suffolk Coastal Port Health Authority (SCPHA) upholds the protection of public and animal health at the heart of trade and commerce.

The Port of Felixstowe is located close to the main shipping lanes and major ports of Northwest Europe. This contributes to more than four million twenty-foot-equivalent units (TEUs), 2,000 ships and 40% of Britain's trade passing through the port every year. As well as being the UK's largest container port, Felixstowe is a key gateway for roll-on/roll-off (ro-ro) trade with Europe, with up to three daily sailings to the Netherlands.

SCPHA also provides port health functions for Tendring District Council and Ipswich Borough Council through Harwich International Port and the Port of Ipswich, respectively. Harwich is a major ro-ro port handling more than 250,000 commercial vehicle movements per year. With up to four sailings per day from the Netherlands, the importance of the North Sea trading route to Europe is second only to trade crossing the English Channel.

In 2023, SCPHA expects to increase the frequency and degree of health checks performed at Harwich following discussions with Hutchison Ports and Tendring District Council.



Although mainly handling aggregate, grain and forestry products, the Port of Ipswich also receives public health services from SCPHA for the protection of seafarers. This includes the testing of potable water sources.

Corporate Health and Safety

The council provides a wide range of services, manages a diverse estate and employs around 970 members of staff in eleven service areas.

The council owns and manages:



4,500 houses



Parks and gardens



Beaches



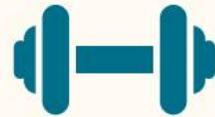
A caravan park



Harbours and marinas



Playgrounds



Sports centres

Council employees are involved in:



Property maintenance



Regulatory inspections and enforcement



Sport and community activities



Harbour management



Office-based work

2.2 Organisational Structure

East Suffolk Council operates a Leader and Cabinet structure and the Cabinet Member with responsibility for Community Health is Councillor Jan Candy.

The Corporate Leadership Team comprises the Chief Executive, three Strategic Directors and eleven Heads of Service. The Corporate Leadership structure is shown in appendix 1. The Chief Executive, Chris Bally, has overall responsibility for the efficient management and execution of the council’s functions. The Environmental Services and Port Health service area reports to Nick Khan, Strategic Director.

Fiona Quinn, Head of Environmental Services and Port Health manages the Environmental Services and Port Health service area. The service area has four teams. Each team has a manager responsible for the delivery of their team’s services as shown in Figure 1. The three teams covered by this plan are the Food and Safety Team, Suffolk Coastal Port Health Authority, and the Corporate Health and Safety Team.

Figure 2. Structure of the Environmental Services and Port Health service area

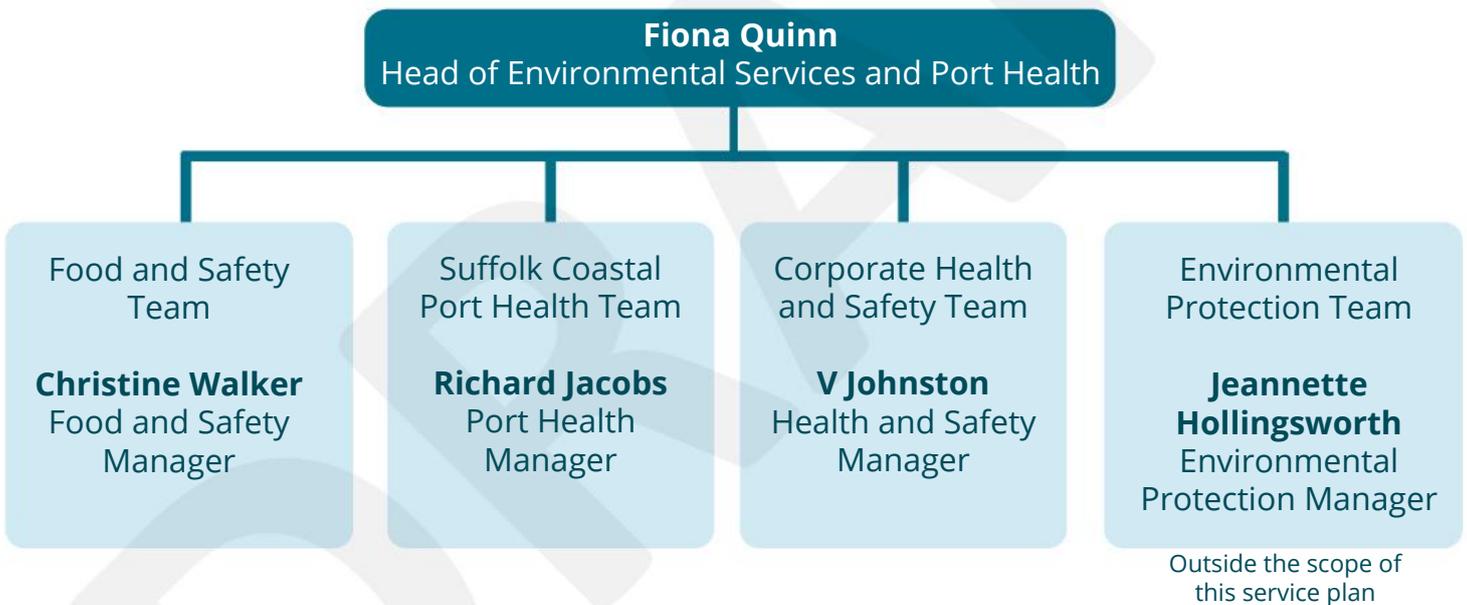


Figure 3. This service plan’s route to adoption by East Suffolk Council



Food and Health & Safety

The Food and Safety Team is managed by the Food and Safety Manager. The team's organisation chart is provided in appendix 2.

The team comprises:

- Food and Safety Manager
- Health and Safety Manager (0.6 FTE)
- Lead Food and Safety Officers
- Food and Safety Officers
- Regulatory Support Officer
- Environmental Health Technical Support Officers.

All members of the team have contributed to the development of this plan, via ongoing discussions and regular team meetings.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) currently employs just over 100 team members as outlined in appendix 3. Led by the Port Health Manager, the three areas essential to SCPHA's success are spearheaded by the Business Manager, Operations Manager and Compliance Manager.

Overseen by the Compliance Manager, the Technical Leads for products of non-animal origin (NAO) are SCPHA's nominated Lead Food Officers, while the Technical Lead for products of animal origin (POAO) is the Senior Official Veterinary Surgeon.

Operations are made up of several highly trained, multi-disciplinary teams performing health checks at Border Control Posts (BCPs). These comprise Authorised Officers (AOs), Port Health Officers (PHOs) and Official Veterinary Surgeons (OVSSs), in addition to Import Control Assistants (ICAs) led by the Business Support Shift Supervisor, who reports to the Business Manager. Each team is overseen and supervised by a Team Leader reporting to the Operations Manager.

The port health function is enabled by finance, public relations, business relations and training professionals led by the Business Manager. This includes an ICT department of quick-response Service Desk Analysts, led by the Service Desk Team Supervisor, and developers led by the ICT Manager.

SCPHA may need to increase the size of its workforce as the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods from October 2023 as part of its Border Target Operating Model (BTOM).

Corporate Health and Safety

The Corporate Health and Safety Team is managed by the Health and Safety Manager. The team's organisation chart is provided in appendix 4.

The team comprises:

- 0.4 FTE Health and Safety Manager
- 4 Health and Safety Advisors
 - 1 FTE dedicated to the Housing service area
 - 0.5 FTE dedicated to SCPHA
 - 1.5 FTE supporting all service areas except Housing and SCPHA.



A food trader at the Suffolk Show.



Our team visits events, like the Suffolk Show and Latitude, to ensure that the food being sold is of a high standard.

2.3 Scope of our Responsibilities

Food and Health & Safety

The Food and Safety Team has responsibility for:

- registering and, where appropriate, approving food establishments
- conducting food safety inspections and other interventions of businesses
- implementing an alternative enforcement strategy for food establishments given an intervention rating of category E for food hygiene (refer to appendix 19)
- providing information on food hygiene standards to residents using the Food Hygiene Rating Scheme
- giving advice to food business operators including help on implementing the Food Standards Agency (FSA) Safer Food, Better Business food safety management system
- checking inland imported foods at retail and catering establishments, issuing Food Export Health Certificates and Premises Endorsements for Export
- investigating complaints concerning food, food establishments and food handling practices
- investigating cases of suspected and confirmed food poisoning
- using a range of food safety enforcement actions, including taking emergency prohibition action where conditions present an imminent risk of injury to health, and prosecution



- providing the Lowestoft Port Health Authority service, inspecting ships and issuing Ship Sanitation Certificates
- conducting health and safety interventions at premises for which the council has legal enforcement responsibility. Proactive inspections are used to target the high-risk activities in sectors specified by HSE in the National Local Authority Enforcement Code or where intelligence suggests risks are not being managed effectively

- leading East Suffolk's Safety Advisory Group (SAG) to engage with event organisers to address public safety as a priority
- investigating complaints concerning work premises and practices
- investigating accidents and dangerous occurrences reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- using a range of health and safety enforcement actions, including taking action to immediately prohibit work activities likely to involve a risk of serious personal injury, and prosecution
- acting as a Responsible Authority under the Licensing Act 2003
- registering persons conducting skin piercing practices and tattooing and the premises used
- investigating cases and outbreaks of infectious disease to control it spreading and identify causes
- ensuring healthier environments where everyone can socialise, relax, travel, shop and work free from any second-hand smoke.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) is responsible for all aspects of health and safety relating to imported food, feed and products of animal origin, as well as materials in contact with food. This involves:

- physically examining samples of imports for health risks
- verifying the legitimacy of documents, containers and packaging
- rejecting imports that fail health standards
- permanently operating from the Port of Felixstowe's 70 Shed and 72 Shed Border Control Posts (BCPs)
- providing health checks at Harwich International Port, the Port of Ipswich and Mistley Quay as required, with a view to establishing a more permanent presence in Harwich
- checking catch certificates to help prevent Illegal, Unreported and Unregulated (IUU) fishing activities



- upholding plastic kitchenware legislation on imports from China
- ship sanitation certification and infectious disease controls
- inspecting vessels to ensure compliance with international and UK health standards
- food hygiene inspections of docked vessels
- verifying organic produce at the point of importation
- undertaking risk-based monitoring and surveillance programmes using current intelligence
- working closely with Trading Standards, the Food Standards Agency (FSA), the Department for Environment, Food and Rural Affairs (DEFRA), the Animal and Plant Health Agency (APHA) and other agencies to ensure effective monitoring and reporting procedures

SCPHA may need to increase the number and frequency of checks it performs as DEFRA looks to introduce new import controls for EU goods from October 2023 as part of the Border Target Operating Model (BTOM).

SCPHA has developed the sophisticated Port Health Interactive Live Information System (PHILIS) to track vessel arrivals, record health checks, manage correspondence and process imports as quickly as possible. This is outsourced to the majority of Britain's port health authorities, with ongoing support and maintenance provided by SCPHA's IT team. PHILIS communicates with other industry-standard systems such as IPAFFS, Destin8 and CNS Compass to exchange crucial information electronically.

The much-anticipated next evolution of PHILIS, NEOMA, is currently being developed by SCPHA's IT team. This will use cutting-edge technology, such as artificial intelligence, to increase the efficiency of port health operations and cut down on waste.



Corporate Health and Safety

The Corporate Health and Safety Team:

- champions and promotes Health and Safety throughout the council by highlighting areas of good practice to ensure a safe working environment exists for staff and visitors
- develops and reviews health and safety policies, safe systems of work, procedures and guidance to assist the council in complying with its duties under health and safety legislation
- undertakes inspections and audits of premises, plant, equipment, working arrangements and relevant databases to ascertain the effectiveness of the council's health and safety policies and to encourage a positive approach to health, safety and welfare matters
- monitors and report on health and safety performance to the Joint Health & Safety Committee and Corporate Management Team
- attends regular meetings with operational staff and their managers, ensuring all Health and Safety matters are given adequate consideration
- provides advice and guidance on all aspects of health, safety and welfare to assist management, employees and their representatives to meet their duties under health & safety legislation. Considers the suitable provision of tools and equipment to, and by, employees to ensure safe working methods are adopted wherever practicable
- is responsible for reporting on policy changes, new legal requirements or guidance for duty holders and on health and safety performance
- monitors reported incidents, accidents and dangerous occurrences and diseases and support managers to investigate the causes and prevent recurrence
- investigates employee complaints about health and safety standards
- liaises with the Health and Safety Executive during interventions and investigations
- assesses and delivers any corporate health and safety training needs. Is responsible for delivery of formal training and briefings on relevant health and safety issues and for supporting Health and Safety Champions within service areas
- is responsible for maintaining and analysing appropriate incident statistics with the intention of identifying any adverse trends and producing regular statistical reports.

2.4 Demands on the Service

Food and Health & Safety

The food safety and health & safety regulatory service is delivered by a single team of people with a mix of skillsets.

Most of East Suffolk's food businesses fall to East Suffolk Council for the delivery of official controls and other aspects of food safety and hygiene legislation. The council regulates over 2,900 food businesses and the FSA itself regulates an additional six approved establishments in the area, for example slaughterhouses, cutting plants and game handling establishments. Profiles of local authority regulated food establishments in East Suffolk according to risk are provided in appendix 5.

An outline of the projected demands on the food safety service is provided in appendix 6.

The 31 businesses that are 'approved establishments' in the area produce fish, shellfish, meat, poultry, and dairy, including raw cow's drinking milk and eggs.

Adnams PLC, St Peter's Brewery, Birds Eye Limited, Indo-European Foods Limited, Lallemand Baking and Stokes Sauces Limited are large food and drink businesses within East Suffolk and many of them export products. We issue Food Export Health Certificates to many of these businesses and charge fees for this service.



Our officers have developed positive working relationships with our businesses, such as Birds Eye in Lowestoft.

East Suffolk attracts many tourists particularly during the summer months and the council supports events which will boost the local economy. We have a diverse range of businesses operated by and/or associated with ethnic minorities. This includes Chinese, Bangladeshi, Turkish, Portuguese and Polish. Many of these businesses are takeaways, restaurants, retail shops and barbers.

Lowestoft Port Health Authority inspects ships under the International Health Regulations 2005 to ensure ships are controlling health risks. We issue Ship Sanitation Certificates and charge fees for this service.

Health and safety law is regulated either by the Health and Safety Executive (HSE) or the local authority with the split being determined by the main activity carried out at the premises. The council generally enforces health and safety law in workplaces where members of the public have access, such as hospitality, retail, consumer services, leisure activities, places of worship and residential care homes along with offices, warehouses and undertakers. The council enforces health and safety law in around 5,700 enterprises. A significant proportion of these are Micro, Small or Medium-sized Enterprises (SMEs).

Investigations into health and safety incidents at premises where East Suffolk Council is the enforcing authority are not foreseeable and can place huge demands on the Food and Safety Team. In 2022/23 two fatal accident investigations have resulted in two officers spending a considerable proportion of their time collecting evidence, producing reports for, and attending, Coroner's Inquests and preparing prosecution files.

The foodhall at the Suffolk Show.



The Food and Safety Team works with event organisers and others during planning and delivery via the Safety Advisory Group to ensure that persons involved in the events, and the members of public that attend them, are protected from risks to their health or safety. Events attracting up to 80,000 people include the Suffolk Show at Trinity Park, Latitude Festival at Henham Park and First Light Festival in Lowestoft. Some events only come to the team's attention at short notice and require significant intervention which can have an impact on the team's workload.

For easy and 24-hour customer convenience we provide all of our application and notification channels online via [the East Suffolk Council website](#). The Food and Safety Team provides a 24-hour, seven-days a week, 52 weeks a year cover for emergencies.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) manages competing demands brought on by ever-changing legislation and commercial activities at the ports of Felixstowe, Harwich and Ipswich.

SCPHA fulfils a legal obligation to deliver official controls at the border, which are frequently updated to reflect new or emerging risks. However, the level of enforcement is determined by the nature and volumes of trade arriving in Felixstowe, Harwich and Ipswich, which can fluctuate considerably.

Every imported consignment has potential to present biosecurity issues and must be processed with vigilance by SCPHA, as officers seek to accurately identify and apply required controls. However, given the current scale of trade and potential impacts on the supply chain, SCPHA aims to minimise intervention on compliant importers and focus on non-compliant products wherever possible. This requires a flexible service with stringent training that asks officers to use their operational knowledge and adapt to changing circumstances.

SCPHA's current service is provided between 6:30am and 10:00pm from Monday to Thursday, 6:30am to 9:30pm on Friday and 6:30am to 2:30pm on Saturdays and Sundays. SCPHA may need to increase the number and frequency of its checks, as well as opening hours and staff numbers, as the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods from October 2023 as part of the Border Target Operating Model (BTOM).

Corporate Health and Safety

The Corporate Health and Safety Team supports the whole council and responds to internal and external demands, both proactively and reactively 24/7.

The number of employees has increased over the past 18 months and there are a number of newly recruited staff and colleagues who have moved posts within the council resulting in a health and safety knowledge gap. This in turn has increased the demands on the Corporate Health and Safety Team to support managers to manage their team and the team's activities safely.

2.5 Compliance and Enforcement Policy

Our Compliance and Enforcement Policy is currently under review. It covers all of the regulatory services delivered by the council, including official controls and those in the wider food safety, health & safety and port health services.

Officers, including those with responsibility for the enforcement of food and health and safety laws, must have regard to the policy when making enforcement decisions.

The policy reflects Government expectations, via the Regulators' Code, towards the regulation of individuals and businesses and endorses the Government's commitment to better regulation, reducing regulatory burdens on business and supporting economic growth.

Our policy sets out the council's commitment to fair, open, transparent, proportionate and intelligence led regulatory services and advocates a staged approach to enforcement using a range of enforcement options available to secure compliance.

Food and Health & Safety

Decisions made in relation to health and safety regulation will also be made in accordance with the **Health and Safety Executive's Enforcement Management Model (EMM)**.

This takes the officer through a logical and demonstrable assessment process to determine an appropriate and consistent level of enforcement, in line with the Compliance and Enforcement Policy.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) follows regulatory requirements as well as the advice and guidance of national competent bodies. The Compliance and Enforcement Policy is applicable to SCPHA, however port health regulatory framework is prescriptive in many areas.

Corporate Health and Safety

The council is regulated by the Health and Safety Executive who will use the EMM and their own Enforcement Policy Statement. The Corporate Health and Safety Team uses the principles of the EMM to benchmark compliance.

3.0 Service Delivery

3.1 Interventions

Food and Health & Safety

Inspections and other interventions are normally conducted at food establishments using a risk-based approach set out in the Food Standards Agency's Food Law Code of Practice (FLCoP). Establishments may be rated as a higher risk either because of the higher-risk nature of their business or because of the lower standards of food safety present, or both.

Establishments receive an overall risk rating ranging from A (highest risk) to E (lowest risk). Profiles of the food establishments in East Suffolk by risk rating categories A to E are shown in appendix 5, along with the number of new food business registrations received and those businesses that are outside the scope of the Food Standards Agency's Food Hygiene Rating Scheme.

New registrations are for new food businesses that have not had a completed inspection. Establishments in the outside category include premises such as primary producers that do not form part of our risk-based intervention programme.

In 2021/23 we were able to deliver the Food Standards Agency's Recovery Plan by directing staff resources to food safety work. An outline of the projected food safety and health and safety service demands in 2023/24 is shown in appendix 6.

We have 936 Category A to D interventions to complete before 31 March 2024. We anticipate we will receive a further 400 new food registrations requiring full inspection through to 31 March 2024 and there are 69 category E interventions that will be subject to our Alternative Enforcement Strategy, as detailed in appendix 19.

Health and safety interventions are conducted by authorised Inspectors in accordance with guidance issued by the HSE to Local Authorities via the National Code and the LAC 67/2 which determines priorities and expectations.

Following national direction from the Health and Safety Executive businesses are only visited if they are deemed to be high risk based on national accident statistics, labour force surveys and local intelligence. In 2022 a project was undertaken to assess compliance in relation to gas and electrical safety in hospitality as that was deemed a national priority. 22 proactive interventions were undertaken and following two recent fires in food businesses with an electrical origin, the project will be continued in 2023/24 with a proactive awareness-raising campaign in conjunction with formal enforcement when it is necessary to secure compliance.

Crowd safety at events is detailed in LAC 67/2 as a priority for proactive intervention. The management of crowds of people is inherently difficult and the harm that can occur depends on the type of event being run. Safety Advisory Group (SAG) meetings are convened to allow the relevant regulatory agencies (police, fire, ambulance, local authority etc.) to gain intelligence prior to any event to allow for emergency planning and advise each other on any areas of concern. The group will also advise the event organiser (duty holder) of ways in which they can manage the event safely although the group as a whole does not have statutory powers and any regulation of the event will be done using primary legislation.

East Suffolk's SAG has representatives from the district and county councils, emergency services, other relevant agencies according to the type of event and event organisers. SAG members formally meet monthly, to review event applications, meet event organisers and advise on public safety but also review a number of plans without the need for a meeting and will provide constructive feedback to the organisers via the chair. Notes of the advice given are shared promptly with SAG members and event organisers.

Recommendations given by SAG are advisory and presented in a non-adversarial way and it is for the organiser to take such steps that are necessary to ensure an event is managed safely. However individual SAG members may have their own legislative powers that relate to parts of the event and will use their statutory powers if risks will not be mitigated following advice from the Group.

East Suffolk welcomes, encourages and supports organisers of safe events. SAG considers events ranging from local community events run by volunteers to large events attracting thousands of people such as the Suffolk Show, Latitude, First Light and international cycle races.

A member of the Food and Safety Team also chairs the countywide SAG and has worked with the Suffolk Joint Emergency Planning Unit to provide training on their role in SAG to officers via multiagency online training. The SAG chair is a member of the Local Authority Regulators Events Expert Panel (LAREEP) hosted by the Office for Product Safety and Standards (OPSS) and has worked with emergency planning colleagues to provide local training workshops on working effectively in a SAG.

The Food and Safety Team's health and safety regulatory activities are benchmarked with other Local Authorities at the Norfolk and Suffolk Health and Safety Liaison Group which is chaired by a member of the Food and Safety Team.

Suffolk Coastal Port Health Authority

The legislative basis for port health enforcement is prescriptive and dynamic, driving almost all interventions conducted by Suffolk Coastal Port Health Authority (SCPHA). As the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods from October 2023 as part of the Border Target Operating Model (BTOM), there may be a realignment of legislative requirements for port health. With potential for a more risk-based approach, greater utilisation of the Compliance and Enforcement Policy may become necessary.

Outside of mandated interventions, SCPHA regularly engages in food monitoring and sampling surveillance programmes. Based on intelligence, these can be at the request of the Food Standards Agency and DEFRA, or as a result of in-house requirements. Monitoring and surveillance programmes always aim to provide greater insight into potential, ongoing or emerging threats to food security at the border and enable smarter targeting for the future.

SCPHA's service is resourced based on current and projected levels of required intervention, with the ability to flex to some degree. Appendix 7 provides an outline of SCPHA's current activities.

Corporate Health and Safety

The Corporate Health and Safety Team has a planned programme of work each year that is completed alongside reactive work.

To give assurance that contractors are complying with health and safety law whilst providing services such as waste collection and grounds maintenance, the team audits the council's main contractor that delivers services on behalf of the council. We also audit the procedures departments have in place to ensure the risks are being adequately controlled.

Our Health and Safety Advisors collaborate with team leaders to assess risks and devise safe systems of work.

The Corporate Health and Safety Team reviews event management plans submitted with applications to use East Suffolk Council land for events and advises teams within the council when they engage in running community events such as the national cycle races.

Health and Safety compliance within the council and SCPHA is one of several Corporate Risks that are monitored and reviewed regularly.

3.2 Investigations

Food and Health & Safety

Approximately 450 complaints were received in 2021/23 about food and food premises and these are shown in appendix 14. This was fewer than in previous years, possibly due to the COVID-19 epidemic and in 2023/24 we expect to receive approximately 300 complaints. Our Common Food Complaints Guide contains self-help advice on common food complaints together with a brief explanation and suggestions for when to contact us or take some other best course of action.

Report a complaint about a food business.

In 2021/23 we dealt with 112 health and safety-related complaints and this year it is anticipated we will receive approximately 50 complaints. The Food and Safety Team will investigate instances of poor working practices, injury or illness.

We expect to receive approximately 140 RIDDOR notifications in 2023/24. RIDDOR notifications are investigated in accordance with published criteria, including the [Health and Safety Executive's Incident Selection Criteria guidance](#).

From April 2023, the Food and Safety Team has responsibility for enforcement of smokefree legislation and for dealing with smoking in enclosed and substantially enclosed places. We anticipate receiving complaints about this in 2023/24.

The Food and Safety Team reacts to intelligence from other agencies such as the emergency services, other council departments and third-party complaints.

Competent, authorised officers assess all complaints and reports and prioritise their response in accordance with the risk to public health and safety, published guidance, codes of practice and other relevant criteria. An outline of projected food safety and health and safety service demands in 2023/24 can be found in appendix 6.



Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) does not receive food complaints in the same way as the rest of East Suffolk Council. Protocols for imported goods are based on receipt of intelligence which may then be used to target consignments.

Corporate Health and Safety

Corporate Health and Safety Team supports managers to investigate incidents where someone was or might have been injured as a result of East Suffolk Council's activities.

Investigations are also conducted when internal audits identify deviations from agreed safe working methods.



3.3 Other Service Demands

Food and Health & Safety

The Food and Safety Team handles applications for the registration of premises and personnel for the purpose of skin piercing and tattooing, which must be conducted hygienically. Applications can be submitted via East Suffolk Council's online application process.

Notifications of the planned, licenced and non-licenced removal of asbestos from certain premises are received via the HSE's Extranet online service. This website allows the sharing of information across individuals and organisations involved in regulating health and safety in the UK.

The expected service demand for skin piercing and tattooing registrations and asbestos notifications is shown in appendix 6.

Suffolk Coastal Port Health Authority

Eleven team members from Suffolk Coastal Port Health Authority (SCPHA) across two teams are combatting the spread of African Swine Fever (ASF) in a joint operation with Border Force, which has seen over one tonne of illegal pork seized from traffic entering the ports of Harwich and Felixstowe.

The operation has secured funding from the Department for Environment, Food and Rural Affairs (DEFRA) until March 2024.

Corporate Health and Safety

Members of the Corporate Health and Safety Team will undertake duties as directed to assist the council in responding to a Civil Contingency Act emergency or business recovery event.

3.4 Home Authority Principle and Primary Authority Scheme

The Primary Authority Scheme is intended to ensure that a business with multiple outlets can have the benefit of a single point of contact for advice that supports consistent enforcement across all of its premises.

Food and Health & Safety

The Food and Safety Team uses the Primary Authority Register to identify if a duty holder has a Primary Authority partner and will have regard to the inspection plans and assured advice provided by it in any local interventions.

The Food and Safety Team is not currently a Primary Authority partner to a business but will consider requests from businesses seeking a Primary Authority.

We act as home authority for all businesses where the relevant decision-making base of an enterprise is located within East Suffolk's area.

Contact us at: environment@eastsuffolk.gov.uk

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) has not been approached by any importer organisations to set up a Primary Authority Partnership.

Corporate Health and Safety

Not applicable to the Corporate Health and Safety Team.

3.5 Advice

Advice is provided primarily via the council's websites.

- East Suffolk Council - www.eastsuffolk.gov.uk
- East Suffolk Means Business - www.eastsuffolkmeansbusiness.co.uk
- Suffolk Coastal Port Health Authority - www.porthealth.uk

Our websites provide direct advice, information and online services 24 hours a day, 7 days a week and contribute to the Strategic Plan Priority of Delivering Digital Transformation. This information is available for businesses, employees and visitors along with a contact form which allows people to request advice without having to be redirected from the Customer Services Centre.

Food and Health & Safety

Our food businesses and our other customers regularly seek advice and assistance from us about food safety and health and safety matters. Enquiries that cannot be answered via signposting to our website and other relevant information sources are generally dealt with by email. Appendix 15 shows that in 2021/23 the Food and Safety Team answered approximately 780 requests for food safety and health and safety advice.

Our team offers a free, informal 30-minute telephone or online chat to assist businesses in complying with food and safety regulations.

The team is notified of events via event licence applications, Temporary Event Notices, East Suffolk Safety Advisory Group (SAG), applications to use council land and by other agencies. We use this information to help us target the provision of valuable information about food safety and health and safety.

61 events were notified to the East Suffolk SAG and 15 events were reviewed at SAG meetings attended by the event organisers.

Further information about the role of the SAG and further guidance on running events safely is available on the [Suffolk Resilience website](#).

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) provides and updates comprehensive online guidance about import controls, operational changes and legislative requirements for importers. This is then emailed proactively to a growing list of subscribers and shared on social media.

Advice ranges from overall legislative frameworks to detailed requirements for specific products. Demand for information is expected to rise as the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods from October 2023 as part of the Border Target Operating Model (BTOM).

SCPHA also hosts a quarterly forum to answer questions directly from importers and regularly writes informative press releases covered by a variety of media outlets. This involves maintaining strong relations with importers, the press and various industry bodies, including the British International Freight Association (BIFA) and Felixstowe Port Users Association (FPUA).

Corporate Health and Safety

The Corporate Health and Safety Team offers advice to all levels within the council e.g., Members, Corporate Leadership Team, managers, team leaders and individual employees.

We use a channel on Microsoft Teams which all staff and councillors have access to. The channel enables staff and members to ask questions and receive communication on health and safety topics. We also use this channel to publish a briefing newsletter on a different topic each month.

We advise the Customer Experience Team on the appropriate steps to be taken to reduce the likelihood of East Suffolk Council employees being exposed to harm as a result of unreasonable behaviours exhibited by customers.

Our team attends the Housing Health and Safety Board and supports the Southwold Harbour Management Committee.

Plus, in 2021/23 we reviewed and offered advice to the council's Asset Management Team on more than 150 applications to hold events on council land.

East Suffolk Council

www.eastsuffolk.gov.uk



No one should be digitally excluded from East Suffolk Council services. We work to Level AA of the Web Content Accessibility Guidelines, the standard many governments use as a benchmark: www.eastsuffolk.gov.uk is usable for everyone.

We aim to ensure our web content and processes are intuitive to make it easy for users to access services. We have online information and transactional services covering business grants and funding, business incentives, business rates, business associations and networks, the environment, business support, East Suffolk Economic Growth Plan, supplying the council, business continuity, land and premises, exporting from East Suffolk, East Suffolk business and community awards, regeneration projects, planning, licensing and waste.

The food safety and health & safety content has our own advice and information and links to other sources. We provide online transactional services which enable our service users to:

- register a food business (via [GOV.UK](https://www.gov.uk))
- order and pay for printed Safer Food, Better Business (SFBB) packs and diaries
- submit a Food Hygiene Rating Scheme (FHRS) appeal, consent to early publication of rating, request a re-visit, and use their Right to Reply
- submit a food or health incident or complaint
- register premises and/or people for skin piercing, tattooing, electrolysis, acupuncture or semi-permanent make-up
- apply for ship sanitation inspections and certificates at Lowestoft Port
- apply for Food Export Health Certificates, Premises Endorsements and Attestations
- apply for a food business establishment approval
- notify us of cooling towers and evaporative condensers
- pay fixed penalties
- register for a food hygiene training course
- request live bivalve molluscs or shellfish registration documents.



East Suffolk Council



@EastSuffolk



@eastsuffolkcouncil



East Suffolk Council

East Suffolk Means Business

www.eastsuffolkmeansbusiness.co.uk

East Suffolk Means Business content is managed by East Suffolk Council's Economic Development and Regeneration Team.



The team invigorates the local economy through physical regeneration whilst enhancing the local environment to support economic growth and prosperity. They encourage new and existing businesses to survive, revive and thrive, making our district more attractive to residents, visitors and investors alike. The team provide ongoing support to the development of a stronger skill base including skills to future-proof tomorrow's generation, today.

The East Suffolk Means Business website content covers the available support, land and premises, grants and funding, invest in East Suffolk, skills and training, and the key sectors in East Suffolk:

- Agriculture, food and drink
- Marine
- Energy
- Ports and logistics
- IT, Tech and digital creative
- Visitor economy and cultural
- Manufacturing and engineering.



East Suffolk Means Business



@ESMBiz



East Suffolk Means Business

Suffolk Coastal Port Health

www.porthealth.uk

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) provides and updates comprehensive online guidance about import controls, operational changes and legislative requirements for importers. This is then emailed proactively to a growing list of subscribers and shared on social media.

PHILIS and NEOMA

Suffolk Coastal Port Health Authority (SCPHA) has developed the sophisticated Port Health Interactive Live Information System (PHILIS) to track vessel arrivals, record health checks, manage correspondence and process imports as quickly as possible. This is outsourced to the majority of Britain’s port health authorities, with ongoing support and maintenance provided by SCPHA’s IT team. PHILIS communicates with other industry-standard systems such as IPAFFS, Destin8 and CNS Compass to exchange crucial information electronically.

The much-anticipated next evolution of PHILIS, called NEOMA, is currently being developed by SCPHA’s IT team. This will use cutting-edge technology, such as artificial intelligence, to increase the efficiency of port health operations and cut down on waste.



3.6 Sampling

Food and Health & Safety

The Food and Safety Team's Food Sampling Policy, including arrangements for the analysis and/or examination of the samples, is set out in appendix 9.

In 2023/24 we will continue to take samples of water and shellfish for classification and algal toxin monitoring purposes.

We also plan to take 80 samples of ready-to-eat food in accordance with our sampling policy, which is detailed in appendix 9. Microbiological analysis of the samples will be for:

- Aerobic colony count
- E. coli
- Listeria species
- Enterobacteriaceae
- Coagulase-positive Staphylococci
- Salmonella species.

Water samples may be taken when investigating outbreaks of Legionnaires' disease.

Unsatisfactory results are followed up in accordance with associated criteria to ensure the risk to public health is protected.



Suffolk Coastal Port Health Authority

The sampling activities conducted by Suffolk Coastal Port Health Authority (SCPHA) are outlined in appendix 10 and driven by legislative requirements.

Outside of mandated interventions, SCPHA regularly engages in food monitoring and sampling surveillance programmes. Based on intelligence, these can be at the request of the Food Standards Agency and Department for Environment, Food and Rural Affairs (DEFRA), or as a result of in-house requirements. Monitoring and surveillance programmes always aim to provide greater insight into potential, ongoing or emerging threats to food security at the border and enable smarter targeting for the future.

SCPHA uses a number of public analysts for the variety of examinations required of various products. Arrangements are in place for the collection and courier of samples, in addition to regular performance monitoring for laboratories.

Corporate Health and Safety

The Corporate Health and Safety Team does not conduct any sampling directly but advises the Asset Management Team and Housing Maintenance Teams on the control of asbestos, legionella and swimming pool water quality which involves the interpretation of sample results.

We will advise the relevant team on what the sampling results mean for the council and any action that is required.



Protecting the public from ill health through animal contact at animal attractions is a priority for our team.

3.7 Control and Investigation of Infectious Disease and Work-related Health Conditions

Food and Health & Safety

The Food and Safety Team investigates food poisoning notifications and outbreaks to control the spread of illness, having regard to the East of England Health Protection Team's Standard Approach to Investigating Gastro-Intestinal Disease Cases. Appendix 11 shows gastrointestinal disease cases in East Suffolk, April 2022 to March 2023.

In 2022, we consulted with the East of England HPT to request members of the public cooperate with medical personal to receive the necessary medical attention to treat a tuberculosis (TB) infection. Failure to take medication for this illness can cause further spread of this infection to other members of the community. These requests are made to control and prevent the spread of TB which could present a risk of significant harm to human health.

Our team also investigated a possible source of E.coli illness within our area. Confirmed cases of food poisoning reported eating food from several different sources, one of which was a food establishment in our area. Officers worked closely with the East of England HPT, part of the UKHSA.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) monitors all Maritime Declarations of Health submitted by vessels to ensure appropriate risk assessments are conducted and infectious disease transmissions are minimised. Early intervention and guidance are obtained from the UKHSA.

The current level of reports and incidents concerning infectious diseases are expected to continue given the variety of vessels seen by the ports of Felixstowe, Harwich and Ipswich from across the world.

Corporate Health and Safety

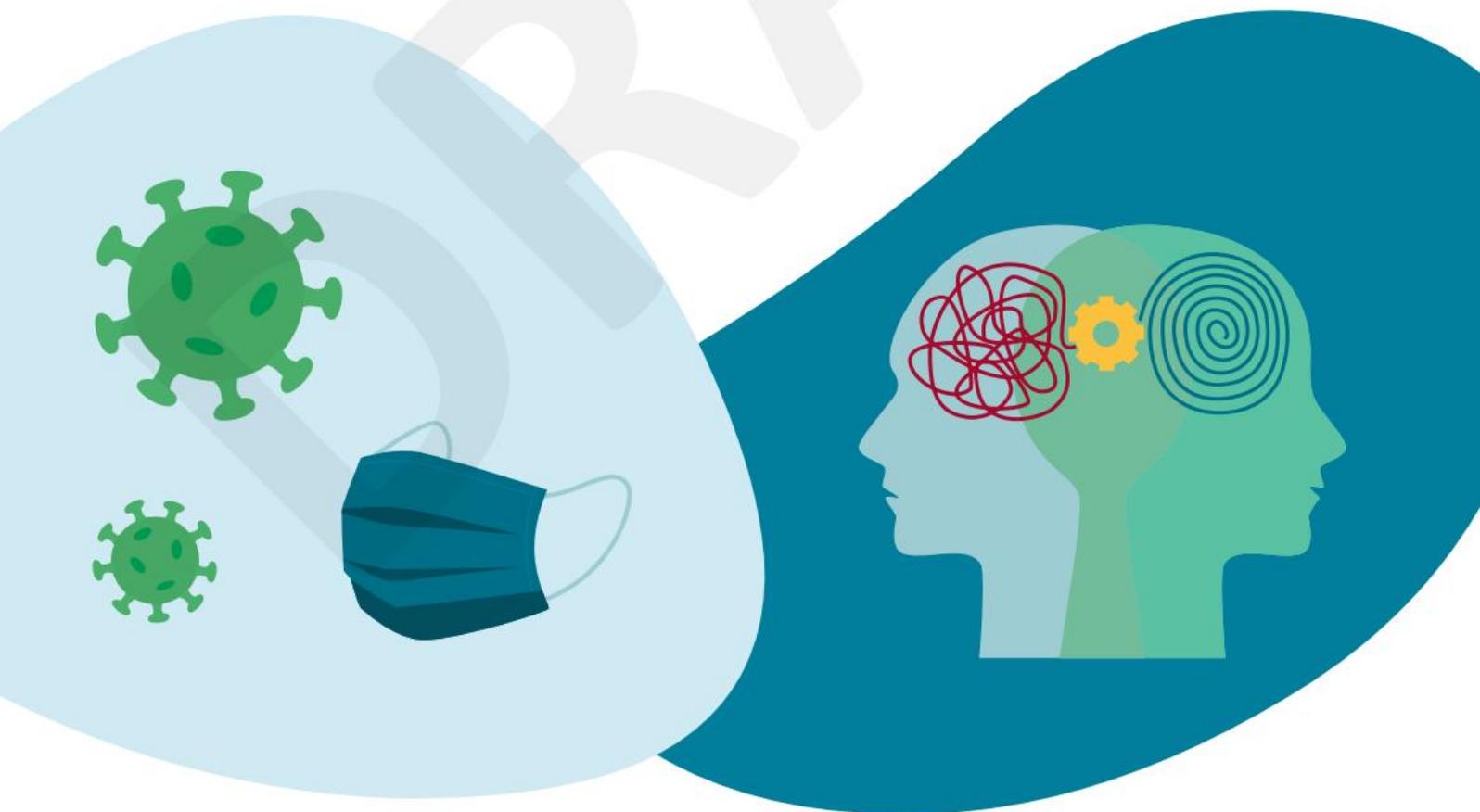
Corporate Health and Safety Team has developed policies in relation to the control of legionella, asbestos, hand arm vibration syndrome (HAVS) and noise.

Routine occupational health surveillance is in place for employees who are exposed to health risks such as working with asbestos, silica dust and powered hand tools.

Mental health and work-related stress are a key priority for the council. The Corporate Health and Safety Team promotes the managers' stress management toolkit and the team stress assessments. These are proactive measures to identify and then modify working practices at an organisational level to reduce the likelihood of people suffering from work related stress. The Human Resources Team leads on the work with individuals who are identified as suffering from work related stress symptoms.

The Corporate Health and Safety Team has worked with individuals to ensure that individuals have appropriate workstations when working from home because of the COVID-19 pandemic. This has involved carrying out detailed display screen equipment assessments, remotely.

Following on from the public health crisis associated with Coronavirus the council has been dealing with numerous outbreaks of Avian Influenza. the Corporate Health and Safety Team has provided advice on the safe handling and disposal of bird carcasses and the appropriate way to work in areas affected by the Avian Influenza outbreaks.



3.8 Incidents

Food and Health & Safety

Incidents may be reported to the Food and Safety Team via external agencies such as the emergency services, FSA, Suffolk Public Health, UKHSA, customer complaints or as a formal report under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

We have procedures for responding to FSA food alerts and arrangements in place to respond out of normal office hours.

Health and safety incident investigations will be prioritised according to risk and a decision to conduct a full investigation will be based on the HSE's published Incident Selection Criteria.

Suffolk Coastal Port Health Authority

Incidents relating to food imports are often flagged by national early warning systems or through direct contact with national competent authorities, such as the Food Standards Agency or Department for Environment, Food and Rural Affairs (DEFRA). These notifications are assessed by Suffolk Coastal Port Health Authority's (SCPHA) Technical Leads and the appropriate response is determined. This process is part of SCPHA's normal service with no changes expected.

Corporate Health and Safety

All incidents that relate to health and safety and involve a risk of or actual injury, damage to property or reputation are reported via the internal reporting system.

The Corporate Health and Safety Team responds to significant incidents to prevent further injury and collect evidence, first hand.

All incidents are reviewed by the Corporate Health and Safety Team who will offer support to managers investigating the incident to determine whether the risk controls are adequate.

Incident and insurance claim statistics are reported to the quarterly Joint Health and Safety Committee.

Incidents that meet the criteria for formal reporting under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 are reported to HSE by the Corporate Health and Safety Team.

Health and safety compliance is monitored as a corporate risk and is risk rated periodically by the Corporate Governance Group.

3.9 Liaison with Other Organisations

The service area has wide engagement with third parties, both for regulatory purposes and to provide services in order to deliver regulatory requirements. Appendix 12 maps key liaison organisations.

Food and Health & Safety

The Food and Safety Team is represented at the Suffolk Food Liaison Group, which has links to regional and national food groups to help achieve consistency.

The team participates in FSA FHRs national consistency exercises.

We are also represented on the South East Shellfish Liaison Group. This group shares information and ensures a coordinated approach by its members that include industry representatives, local authorities, FSA, CEFAS and the Environment Agency.

The team is represented at the Norfolk and Suffolk Health and Safety Liaison Group (NSHSLG), which benchmarks the LAE1 intervention return for the Norfolk and Suffolk authorities on an annual basis.

We have representation at national meetings with HSE and liaise with the regional representative on HELA Practitioners Forum.



Wherever possible, our teams train and work together to provide an efficient and effective service. Here, officers are receiving training to undertake ship sanitation inspections.

Suffolk Coastal Port Health Authority

As one of the UK's biggest port health authorities operating from Britain's busiest container port, Suffolk Coastal Port Health Authority (SCPHA) takes a leading industry role through constant dialogue, liaison and representation with various organisations. This includes:

- Department for Environment, Food and Rural Affairs (DEFRA)
- Food Standards Agency
- Animal and Plant Health Agency
- Marine Management Organisation
- British International Freight Association.

SCPHA is also engaged with several Brexit and government initiatives, such as the DEFRA Business Readiness Forum and 2025 UK Border Strategy, and hosts the quarterly Port Health Stakeholder Forum to unite the logistics community for insight into port health. This is in addition to being a founding member of the Major Ports Forum.

Corporate Health and Safety

A member of the Corporate Health and Safety Team attends the Eastern Region Corporate Health and Safety Advisors Group.

Corporate Health and Safety Team members attend two local health and safety group meetings, the Suffolk and North Essex Occupational Safety Group and the Waveney Safety and Environment Group, which are groups comprised of private and public sector health and safety professionals.

Corporate Health and Safety Team individuals are members of the Institute of Occupational Safety and Health (IOSH) or the Chartered Institute of Environmental Health (CIEH) or both.

IOSH and CIEH both provide learning and networking opportunities along with professional publications.

3.10 Promotional and Engagement Work

Food and Health & Safety

The East Suffolk Council website is used to publish information proactively, including downloads and signposts to other websites.

At times other than during site visits, direct contact with businesses is generally via email. The Food and Safety Team works with the Economic Development and Communications Teams to promote key topics and messages using social media and business networks.

To ensure consistent information is provided, where available, we promote publications made available by the FSA and HSE etc. that are intended for businesses or the public.

Examples include helping business operators meet regulations on food hygiene through promoting Safer Food, Better Business packs.



Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) sees frequent media coverage about its work in protecting public and animal health, with its Public Relations & Communications Officer writing regular press releases, arranging interviews, overseeing media visits and creating online content.

Having established itself as a vital part of public and animal health in the eyes of policymakers, importers and the general public, SCPHA aims to bring awareness to the importance of stringent checks at the border through public relations, while continuing to reaffirm its position as a leading authority. This is in addition to an ongoing awareness campaign about its joint operation with Border Force to combat the spread of African Swine Fever in Britain.

The Business Relationship Officer also hosts the quarterly Port Health Stakeholder Forum to unite the logistics community for insight into port health, while the Business Team as a whole regularly visits schools and colleges to educate future generations about the role of port health. This includes a recent partnership with Suffolk New College.

Corporate Health and Safety

The Corporate Health and Safety Team engages with individuals and managers across the council. The Health and Safety Advisors join team meetings for the services they support.

The council has a Health and Safety Committee which meets quarterly and is attended by the Corporate Health and Safety Team, Human Resources Team, Unison and champions who have been nominated by their service area.

The Corporate Health and Safety Team produces a monthly newsletter and is reinstating drop-in sessions in the breakout areas at Riverside, East Suffolk House, Marina Centre and Port Health as well as online for those who are no longer predominantly office based.

Working in conjunction with the Health and Wellbeing group, the team promotes campaigns, opportunities and techniques for keeping colleagues in good physical and mental health.

4.0 Resources

4.1 Financial Allocation

Details of budgetary provision for the service area are included in [East Suffolk's Budget Book 2023/24](#).

Financial provision enables the use of external legal services where appropriate.

Food and Health & Safety

COVID-19 grant funding provided additional resources to carry out COVID-19 work and backfilling up to 31 March 2023. All catch-up work was completed on time and no additional resource is available for this purpose in 2023/24.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) is entirely self-funding due to the cost-recovery arrangements in place for importers, with no impact being made on the taxpayers of East Suffolk. A full list of charges can be found on the SCPHA website, which are updated yearly to reflect expenses and inflation. Currently, SCPHA's services cost around £5.6m per year to run.

Funding has also been provided until March 2024 by the Department for Environment, Food and Rural Affairs (DEFRA) for two of SCPHA's teams, who are combatting the spread of African Swine Fever (ASF) in a joint operation with Border Force.

Corporate Health and Safety

Corporate Health and Safety Team resources are combined with those of the Food and Safety Team.

Supplying the Council

East Suffolk Council spends around £28 million each year and we are keen to encourage a diverse range of suppliers, both large and small.

As a local council we are not just looking for the biggest companies to supply us, we encourage organisations of all sizes to bid on our tenders. There is something for everyone and we are shaping procurements for all kinds of bidders. [Head to our website for more information.](#)

4.2 Staffing Allocation

Food and Health & Safety

Competent officers are authorised according to the findings of competency assessments based on qualifications, technical knowledge and regulatory experience. Food competencies are assessed in accordance with the FSA's Food Law Code of Practice and Practice Guidance and the Competency Framework.

Our team's current regulatory allocated full time equivalent (FTE) staffing resources are 14.9 FTE, split as follows:

Food Safety enforcement work:

- Total staffing - 11.8 FTE
- Authorised Officers - 9.3 FTE
- Technical Support - 2.5 FTE

Health and Safety:

- Authorised Officers - 2.6 FTE
- Technical Support - 0.5 FTE

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) currently employs just over 100 team members as outlined in appendix 3.

Overseen by the Compliance Manager, the Technical Leads for products of non-animal origin (NAO) are SCPHA's nominated Lead Food Officers, while the Technical Lead for products of animal origin (POAO) is the Senior Official Veterinary Surgeon.

Technical Leads, Official Veterinary Surgeons (OVSS) and Port Health Officers (PHOs) must be sufficiently qualified and authorised according to the Food Law Code of Practice (FLCoP) as key operational decisionmakers. The FLCoP also permits more limited decision-making responsibilities for Authorised Officers (AO) following training and competency assessments, however SCPHA aims to reserve such duties for the most qualified and experienced team members.

Corporate Health and Safety

The Corporate Health and Safety Team is managed by the Health and Safety Manager and comprises:

- Health and Safety Manager (0.4 FTE)
- Health and Safety Advisors (1.5 FTE)
- Health and Safety Officer - Housing Maintenance (1 FTE)
- Health and Safety Officer/Trainer - Port Health (0.5 FTE)

The total staffing allocation is 3.4 FTE.

4.3 Staff Development Plan

Our workforce is at the heart of everything we do. One of the ways we support the development and competence of staff is through ongoing training and development provided in-house and externally.

To meet this challenge, we have created an opportunity for five council employees to be apprentice environmental health practitioners. We believe this was the largest number of environmental health apprenticeships starting together in any local authority in 2021/23. It attracted the attention of the professional body (the Chartered Institute of Environmental Health) and much professional news coverage.

This is developing our staff and helping to address the challenge of recruiting environmental health practitioners in the future. Having started with a September 2021 enrolment on the Environmental Health Practitioner Apprenticeship (Level 6), one member of the Food and Safety Team and one member of SCPHA are working in the professional field whilst studying for a degree at the same time. Other recruits are working within Environmental Protection.

In 2021/23, we responded to the FSA's revised 2021 Competency Framework by reviewing the arrangements we have in place against the framework. Officers with responsibility for carrying out official controls maintain their own competency framework record, which is developed as further knowledge and skills are acquired.

We will continue to work in partnership with our colleagues in SCPHA to meet competency requirements, given that we all carry out official controls.

Environmental Health Practitioner Apprenticeship (Level 6)

The four-year course has been developed through consultation with the Chartered Institute of Environmental Health and the Institute for Apprenticeships, along with employers from a range of public and environmental health related fields.



Two of our current apprentices,
Nikki Crisp and Hannah Gilson

Food and Health & Safety

Authorised officers in the Food and Safety Team are required to demonstrate Continuing Professional Development (CPD) in line with their membership of relevant professional bodies e.g., CIEH and IOSH.

Officers conducting food safety interventions undertake 20 hours of CPD related directly to food safety each year.

Officers subscribe to an online resource provided by a niche company of food consultants specialising in the training of food law enforcement officers.

In 2021, the Food and Safety Team supported four SCPHA staff to obtain their Higher Certificate in Food Control by providing them with case studies and practical experience to complete their competency development portfolio. Two of these staff members now work within the team and have responsibility for carrying out official controls.

The Norfolk and Suffolk Health and Safety Liaison Group holds an annual training day open to all health and safety regulators across Norfolk and Suffolk.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority's (SCPHA) Technical Trainer develops and delivers programmes with the Technical Leads to keep operational staff up to date with current legislation, best practice and industry standards, while the Business Trainer is responsible for teaching all staff and external parties about SCPHA's IT and business systems.

All newcomers undergo a training schedule suited to their role with continuous development opportunities during their time with SCPHA. Once the trainers and Technical Leads are satisfied with a newcomer's required competencies, authorisation is given for them to take on their duties.

Thousands of courses through Pluralsight, the online education platform, are currently being offered to business and IT team members to promote continuous development, with a view to expanding the offer to all staff depending on its success.

In-line with the Food Law Code of Practice (FLCoP) Competency Framework, SCPHA supports further training opportunities for its staff and recently saw four team members earn the Higher Certificate in Food Control (HCFC). This is in addition to taking on apprentices in environmental health and IT, as well as supporting various team members to complete their environmental health degrees.

Corporate Health and Safety

Corporate Health and Safety Team members undertake CPD in accordance with their membership of the Institute of Occupational Safety and Health (IOSH) and/or the Chartered Institute of Environmental Health.

Team members are encouraged to attend IOSH meetings and webinars.

We use regular in-house learning and development sessions to update knowledge and maintain competency.

The Corporate Health and Safety Team is a member of the Suffolk and North Essex Occupational Safety Group and the Waveney Safety and Environment Group both of which hold monthly meetings with an education element and Corporate Health and Safety Team members are encouraged to attend when relevant.

One member of the Corporate Health and Safety Team has enrolled on a NEBOSH Level 6 Health and Safety Diploma.

East Suffolk Values...



PROUD

Believing in who we are, what we do and where we live.



GOOD VALUE

Delivering outstanding services, smartly and economically.



TRUTHFUL

Honest and clear in all we do.



UNITED

Whoever we work with, we work as one team.



DYNAMIC

Transforming the future with you in mind.

5.0 Quality Assessment and Internal Monitoring

Food and Health & Safety

The Food and Safety Manager and Lead Food and Safety Officers monitor the work of the Food and Safety Team.

The team has documented procedures for all activities and a designated officer is responsible for reviewing and revising the procedures and maintaining an overview of the team's activities in their area of responsibility.

Environmental Health Technical Support Officers carry out the document control function for the team.

The HSE's LAE1 return is benchmarked at the Norfolk and Suffolk Health and Safety Liaison Group.

Customer feedback is invited via online surveys. A summary of the results is provided in appendix 13. More than 95% of the responses said their business was treated fairly, more than 97% said the contact was helpful and over 94% said communication was clear.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) creates an annual risk-based audit plan to ensure effective and efficient internal processes. This includes a technical audit schedule that tests legislative compliance, as well as best practice and internal policies.

SCPHA is ISO 9001:2015 accredited, which covers imported food controls and is a key performance indicator within East Suffolk Council's performance framework. This saw SCPHA undergo six monthly audits from external auditors to ensure adherence to the quality system.

Opportunities to improve across all areas within SCPHA are sought regularly and fed into reviews to improve knowledge and training provision.

Corporate Health and Safety

The Corporate Health and Safety Team has adopted the principles of HSE's HSG65 for health and safety management Plan, Do, Check, Act.

Incident data for the council and its contractors is reviewed by the Health and Safety Committee.

Corporate Health and Safety has been entered as a risk on the Corporate Risk Register and is monitored via the Corporate Governance Group.

A programme of peer review is being considered by all Suffolk Local Authorities.

PLAN DO CHECK ACT



Mobile food traders, including these ones at the Suffolk Show, are inspected by our Food and Safety Team officers.

6.0 Review

6.1 Review against the Service Plan

Managers are responsible for ongoing reviews throughout the year and key reporting on the delivery of the services to the Head of Service and via briefings with the Cabinet Member for Community Health.

The provision of the council's business as usual tasks and projects are monitored, recorded and reviewed against its Strategic Plan.

Food and Health & Safety Service Plans include reviews and reports about the delivery of services. Service plans are submitted to Full Council for review and adoption. The last Food and Health & Safety Service Plan was adopted for the years 2021/23 and contained a review of the year 2019/20. This service plan reviews years 2021/22 and 2022/23. It will be presented to East Suffolk's Full Council on 22 November 2023.

Food and Health & Safety

Our Key Performance Indicator (KPI) dashboards clearly show how we are monitoring performance and delivering against our priorities within the East Suffolk Strategic Plan. We regularly publish in the Communities Theme dashboard the updated KPI Food Hygiene Rating (% at 3-5) i.e., rated 'generally satisfactory' or better.

East Suffolk Food Hygiene Ratings (to April 2023)	Businesses with rating (number)	Businesses with rating (percentage)
5 - Very good	2023	84.8%
4 - Good	271	11.4%
3 - Generally satisfactory	58	2.4%
2 - Improvement required	20	0.8%
1 - Major improvement required	14	0.6%
0 - Urgent improvement required	1	0.0%

Regulatory food safety activities are reported to the FSA via an End of Year Return. Regulatory health and safety activities are reported to HSE via the LAE1 report. Proactive enforcement interventions conducted as part of a project are evaluated at an early stage to ensure that the project is appropriately targeted at non-compliant businesses.

In 2021/22 and 2022/23 the Food and Safety Team:

- conducted over 98% of the food interventions which were due or overdue in category A to D food businesses
- determined that over 90% of the food businesses inspected were broadly compliant with food safety regulations
- obtained 225 food, water and shellfish samples
- responded to the discovery of illegally imported products of animal origin from by the Police and Suffolk Trading Standards during a multi-agency 'stop and check' campaign in Lowestoft. We removed almost 100kg of illegal meat from the UK food chain and ensured it was disposed of safely
- assisted Suffolk Trading Standards and APHA in detecting and reporting poultry birds being kept outside within an Avian Influenza Prevention Zone
- introduced a new, single set of skin-piercing byelaws across East Suffolk Council.
- liaised with the East of England HPT (part of the UKHSA) to request members of the public cooperate with medical personnel to receive the necessary medical attention to treat a tuberculosis (TB) infection. Failure to take medication for this illness can cause further spread of this infection to other members of the community. These requests are made to control and prevent the spread of TB which could present a risk of significant harm to human health
- submitted quarterly and annual End of Year Returns to the FSA. A summary is provided in appendix 14
- submitted an annual LAE1 return to the HSE. A summary of the activity is provided in appendix 16.



Appendix 15 sets out additional food and health & safety statistics for 2021/23 including:

- skin piercing and tattooing registrations
- health and safety complaints, advice, and assistance
- asbestos notifications
- reports of lifting equipment defects.

The Food and Health & Safety Service Plan reported, as of September 2021, a backlog of 337 newly registered food establishments that had arisen because staff resources had been redeployed to manage the risk of COVID-19 spreading and, having regard to FSA guidance to local authorities, our food safety intervention programme was largely paused except for higher food safety risk concerns. In 2022/23 we moved at a faster pace and conducted 474 food interventions of newly registered food business establishments, eliminating the backlog and ending the year 2022/23 with just 16 new food businesses to inspect.

The Food Hygiene Rating (% at 3-5) KPI was consistently above the 95% target.

In 2023/24 we are continuing to contribute to the Strategic Plan by:

- adopting skin piercing byelaws for East Suffolk based on national model byelaws
- submitted an annual LAEMS return to the FSA. A summary is shown in appendix 16. In line with FSA guidance in response to the COVID-19 pandemic the food intervention programme was reduced. Interventions of higher risk food businesses in categories A and B continued to be a priority. The inspection of lower risk categories was largely paused.

Suffolk Coastal Port Health Authority

The overarching review for the delivery of the service plan is undertaken by East Suffolk Council. Suffolk Coastal Port Health Authority (SCPHA) also runs an ongoing performance monitoring programme to capture more localised feedback.

Corporate Health and Safety

The Corporate Health and Safety Team meets fortnightly and has scheduled reviews of the internal team workplan which feeds into the Strategic Plan.

We report to CLT annually on achievements and matters of concern.

6.2 Identification of any Variation from the Service Plan

Food and Health & Safety

Two new Lead Food and Safety Officer posts have been created to oversee operational management of the Food and Safety Team's functions. The Food and Safety Team Manager now undertakes a more strategic role than previously. A new Regulatory Support Officer post has been created to assist authorised officers.

The Food Safety Level 2 Award in Food and the Healthy Eating Award Scheme remains paused.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) has experienced significant variance since 2020 while responding to and recovering from the effects of the COVID-19 pandemic.

While trade has begun to return to normal volumes over the last year, SCPHA may see changes to its services as the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods from October 2023 as part of the Border Target Operating Model (BTOM).

Corporate Health and Safety

The COVID-19 pandemic has resulted in changes in the way services have been delivered across the council. The Corporate Health and Safety Team has been flexible and able to support teams through their new ways of working.

The Annual Cycle process where team leaders were required to submit returns throughout the year to document that they had completed health and safety tasks was a record of activities but was not an effective tool to assist team leaders to successfully manage health and safety. Due to restrictions in the software a request for assistance would not usually be received by the Corporate Health and Safety Team until the end of the year. A new management system has been introduced with the Health and Safety Advisors now working with and alongside team leaders throughout the year.

6.3 Areas of Improvement

To support the use of our on-line forms we will introduce an automatic message telling the customer how they can use alternative contact methods if they have difficulty with completion.

Food and Health & Safety

Ways of working that were developed during the COVID-19 pandemic have been reviewed and those that have been shown to be an improvement have been kept in place. For example, using remote inspection techniques where appropriate, prioritising work according to risk and using the website to signpost businesses and customers to further guidance and self-help tools.

The Food and Safety Team is continuing to introduce and improve document automation to improve the clarity and consistency of Food Safety and Hygiene Intervention Reports and other documentation provided to our customers.

We are continuing to add online forms to our website for our customers to use.

Suffolk Coastal Port Health Authority

The next evolution of Suffolk Coastal Port Health Authority's Port Health Interactive Live Information System (PHILIS), NEOMA, is currently being created by SCPHA's dedicated team of IT developers. This will use cutting-edge technology, such as artificial intelligence, to increase the efficiency of port health operations and cut down on waste.

Currently, PHILIS is outsourced to the majority of Britain's port health authorities, with ongoing support and maintenance provided by SCPHA's IT team. Over time, NEOMA is expected to replace PHILIS in these instances, greatly expanding SCPHA's IT services.

As the Department for Environment, Food and Rural Affairs (DEFRA) looks to introduce new import controls for EU goods from October 2023 as part of the Border Target Operating Model (BTOM), SCPHA may need to undergo a major service development.

Corporate Health and Safety

Corporate Health and Safety Team operates a management process whereby the Health and Safety Advisors are allocated service areas and will support those teams, becoming the "go to" person on health and safety matters for the managers in that department.

The new post created in the Port Health Team to be a dedicated health and safety resource to review and revise the existing procedures and to risk assess and train port health team members has been extended for 12 months. This post sits within the Corporate Health and Safety Team but focuses specifically on SCPHA.

“ A few words from our apprentice, Hannah Gilson

I started working for Suffolk Coastal Port Health Authority in the June of 2016, as a Port Health Assistant. Over the years the role has developed to meet the needs of the ever-changing demands within Port Health and as a result my role is now an Authorised Officer.

I work within a team of fifteen authorised officers, our role is so varied and there are never two days the same. We deal with correspondence from external organisations, examinations on imported goods, document checks and authorisation of selected goods coming into the country. There are times when certain goods do not fall within our remit and on those occasions, they are passed on to the Port Health Officers and the Official Veterinarians within Port Health.

Two years ago, I applied to undertake an apprenticeship programme through Port Health and East Suffolk Council and was lucky enough to be selected after an interview process. The course is a degree, in Environmental Health, provided by Weston College, which I do as a distant learner. The lecturers are highly skilled and have a vast knowledge of the subjects that I am studying. As it is an apprenticeship the lecturers can call upon students to offer up their knowledge as well, which makes the course very current and a great way to learn. The modules that I have studied have been interesting and varied - some of the topics that I have looked at have been outbreak control under the food module, noise pollution under environmental protection, and human anatomy under public health.

Although I rarely make it to Weston-Super-Mare, due to the distance, I have been fortunate enough to undertake the course with four other apprentices from East Suffolk Council, who work in other areas of environmental health. We have at times been able to work together on some of the assignments and have helped each other when it has been needed. I have found this a great help and support knowing that there are others that I can turn to, who are going through the same experience as me and I thank East Suffolk for doing that.

I have come to the end of my second year with two more to go, and over the summer periods when not at college the 'off the job' hours of the apprenticeship still need to be honoured, and Port Health and the Environmental Health Officers from the Food and Safety Team have provided me with lots of opportunities for learning and guidance. Last summer I shadowed some of the Food and Safety Officers on their visits to businesses to assess whether they had complied with food hygiene standards. I have also shadowed Port Health Officers when they have undertaken ship sanitation inspections and sampling goods that I do not usually get to see. I hope to do more shadowing this summer so I can get ready for year three which looks to be as exciting as the other two.

Hannah Gilson

Environmental Health Apprentice





A few words from our apprentice, Nikki Crisp

Back in the summer of 2021, whilst still in the midst of the Covid pandemic, I was offered the opportunity to undertake a Level 6 Apprenticeship in Environmental Health with a view to becoming a fully qualified Environmental Health Practitioner. The apprenticeship would involve learning on the job and studying remotely with Weston College in Weston-Super-Mare. The tutors had become quite adept at remote learning during the pandemic and were offering the course to both full time students and apprentices alike with a commitment to delivering the majority of the course remotely.

My team release me to study one day a week where I attend lectures remotely via Teams, with occasional travel to Weston Super Mare to meet up with the other apprentices on the course to partake in workshops, field studies or intensive classroom learning. Online lectures to date have covered a variety of topics across environmental health law, food safety, microbiology, air quality, noise pollution and a range of public health topics. There's even been some geology and some anatomy and physiology in there so it's a far broader topic than it might seem.

Fast forward two years and I am now halfway through said degree having completed six modules including passing the CIEH professional qualification – the food identification exam, an important step in qualifying as an EHP. It has been quite an intense 2 years - I've also taken on the role of Regulatory Support Officer in my team, so I've been learning new skills and applying my studies to my new role, and vice versa. Year 3 of my apprenticeship will cover topics including housing and health and safety as well as health promotion so lots more learning opportunities to come and interesting assignments to complete.

It can be hard to juggle assignments around a busy job, particularly coming out of the pandemic with the FSA Recovery Plan targets and a backlog of inspections and related work to get through, as well as the challenge of a new role in the team, plus factoring in children and busy family life. That said, remote learning works really well in this respect and affords the opportunity for East Suffolk to 'grow their own' which might not have been possible with face to face training and limited offerings in this part of the country. I don't think I would have been able to commit to the course, and fit it around family life and work, if it wasn't offered in this way. It's hard to believe I'm halfway through the course already, it really has gone so fast.

Nikki Crisp

Environmental Health Apprentice and
Regulatory Support Officer



7.0 Caring for our Environment

Our service area's work supports East Suffolk Council's Strategic Plan commitment to 'put the environment at the heart of everything we do'. In particular, we contribute to the Plan's environment priority areas of 'Leading by example' and 'Minimise waste, reuse materials & increase recycling'.

The current East Suffolk Council Environment Policy will be updated in late 2023; this service plan will aim to incorporate any relevant changes to this policy where required.

Food and Health & Safety

All work is allocated in such a way as to minimise travelling distances.

Team members work from home, avoid unnecessary travel by car and have "paperless" work procedures.

Meetings and training events are conducted online wherever possible.

Alternative enforcement strategies are used, where applicable, reducing the need to visit businesses (refer to appendix 19). Remote interventions are conducted where suitable and appropriate.

Suffolk Coastal Port Health Authority

Suffolk Coastal Port Health Authority (SCPHA) runs a mix of hybrid and electric vehicles when team members need to travel across the Port of Felixstowe and to different operational sites, such as Harwich International Port. Where possible, team members are also given the option to work from home as part of a hybrid pattern, further reducing carbon emissions and improving work-life balance.

Following legal consultation over what can serve as official import notifications, SCPHA is now able to accept digital import documents and significantly cut down on paper-based hardcopies. SCPHA aims to digitise more import documentation over the coming years, with its in-development document processing software, NEOMA, aiding the process greatly by using cutting-edge technology such as artificial intelligence.

Corporate Health and Safety

Corporate Health and Safety Team promotes the efficient and responsible use of the natural environment when giving advice and during policy development.

Our team members work from home, have “paperless” work procedures and avoid unnecessary travel by car.

Corporate Health and Safety Team promoted the use of tablets by all Housing Maintenance operatives (over 80 people) to aid communication, ensure safety information is current and available at all times and to reduce the volume of paper risk assessments and method statements which were previously carried in each vehicle.

Single use personal protective equipment is avoided when other alternatives are available.



We work hard to care for our environment and keep East Suffolk looking its best.

Abbreviations

AO	Authorised Officer
APHA	Animal and Plant Health Agency
BCP	Border Control Posts
BPDG	Border and Protocol Delivery Group
BTOM	Border Target Operating Model
CIEH	Chartered Institute of Environmental Health
COVID-19	Coronavirus disease: an infectious disease caused by the SARS-CoV-2 virus
CPD	Continuing Professional Development
CLT	Corporate Leadership Team
DEFRA	Department for Environment, Food and Rural Affairs
EMM	Enforcement Management Model
EoEHPT	East of England Health Protection Team
FHRS	Food Hygiene Rating Scheme
FLCoP	Food Law Code of Practice
FTE	Full Time Equivalent
FSA	Food Standards Agency
HAVS	Hand Arm Vibration Syndrome
HRFNAO	High risk food of non-animal origin
HSE	Health and Safety Executive
HIP	Harwich International Port
HMI	His Majesty's Inspectorate
HMRC	His Majesty's Revenue and Customs
HSWA	Health and Safety at Work etc. Act 1974
HPT	Health Protection Team
ICA	Import Control Assistant
ICT	Information and Communications Technology

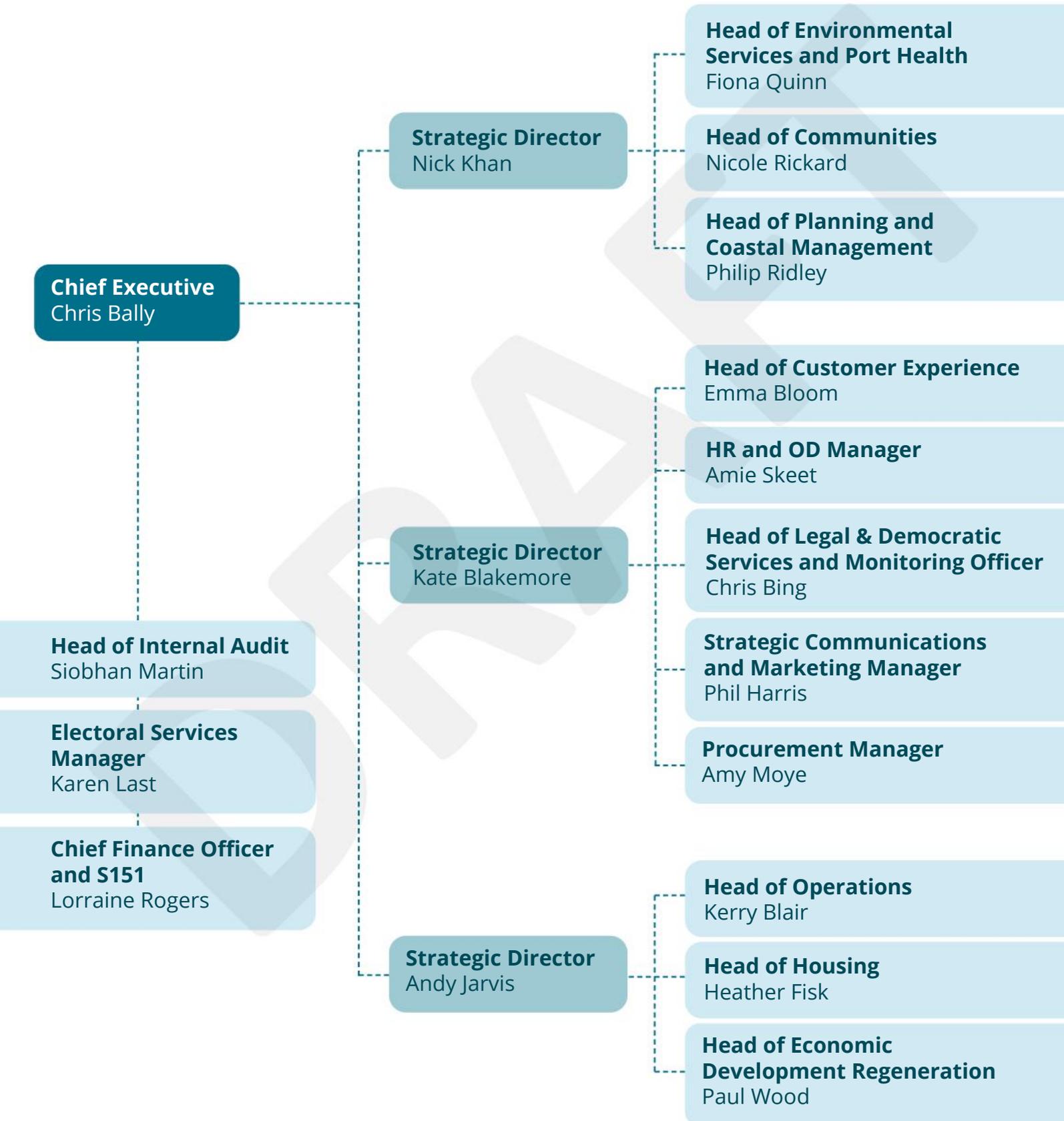
ABBREVIATIONS

IFCA	Inshore Fisheries and Conservation Authorities
IUU	Illegal, Unreported and Unregulated fishing
KPI	Key Performance Indicator
IOSH	Institute of Occupational Safety and Health
LAC 67/2	Local Authority Circular (revision 12) guidance issued under Section 18 of the Health and Safety at Work etc. Act 1974
LAE1	Annual return to the Health and Safety Executive on local authority health and safety intervention and enforcement activity
MMO	Marine Management Organisation
MHRS	Medicines and Healthcare products Regulatory Agency
NAO	Non-Animal Origin
NSHSLG	Norfolk and Suffolk Health and Safety Liaison Group
OVS	Official Veterinary Surgeon
PHO	Port Health Officer
PoAO	Products of Animal Origin
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
RSPH	Royal Society for Public Health
PHA	Port Health Authority
PHSI	Plant Health and Seeds Inspectorate
SAG	Safety Advisory Group
SPDB	Strategic Plan Delivery Board
SCPHA	Suffolk Coastal Port Health Authority
SME	Small or Medium-sized Enterprise
TEU	Twenty-foot equivalent unit
UKHSA	UK Health Security Agency

Appendices

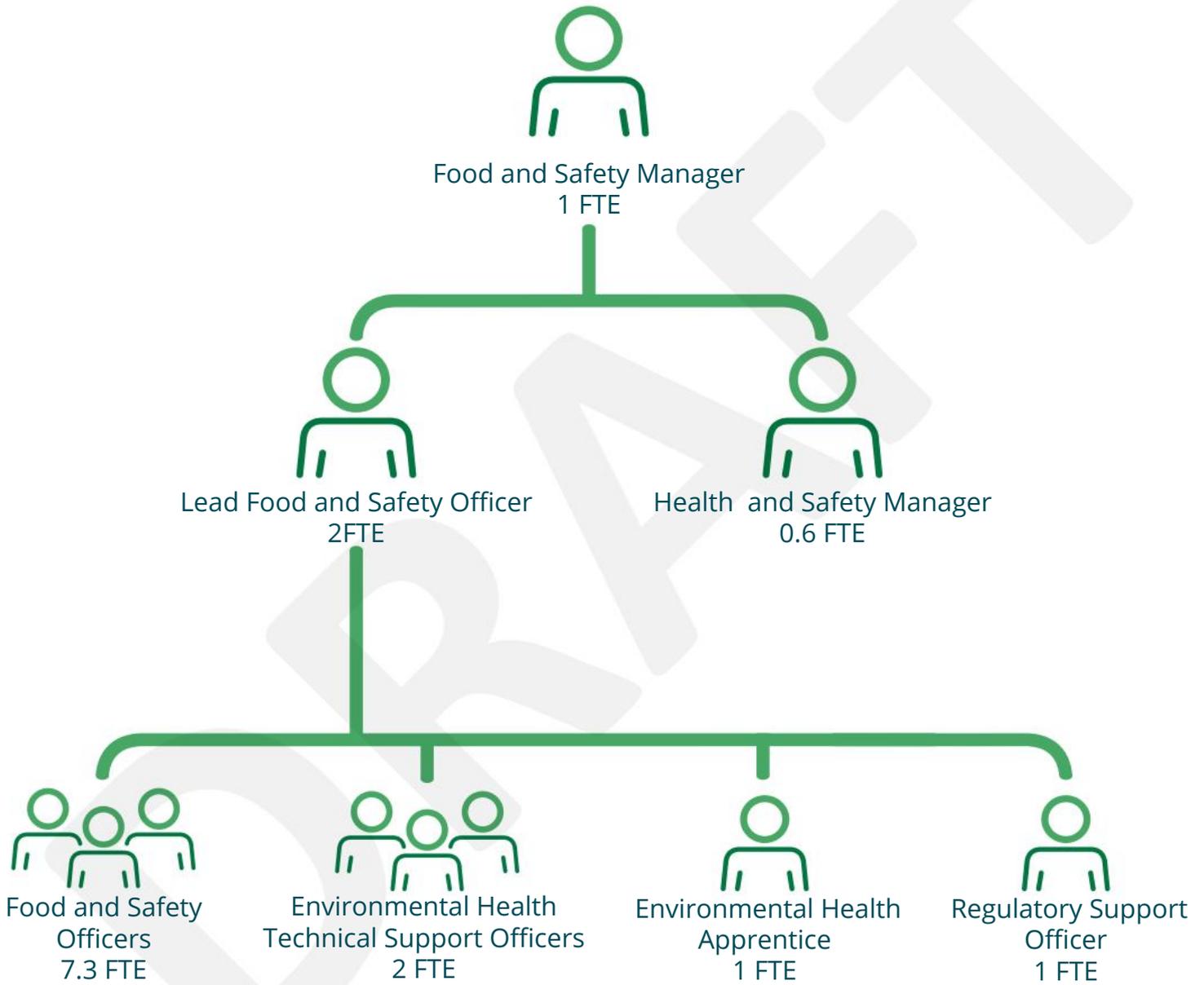
Appendix 1

Corporate management structure.



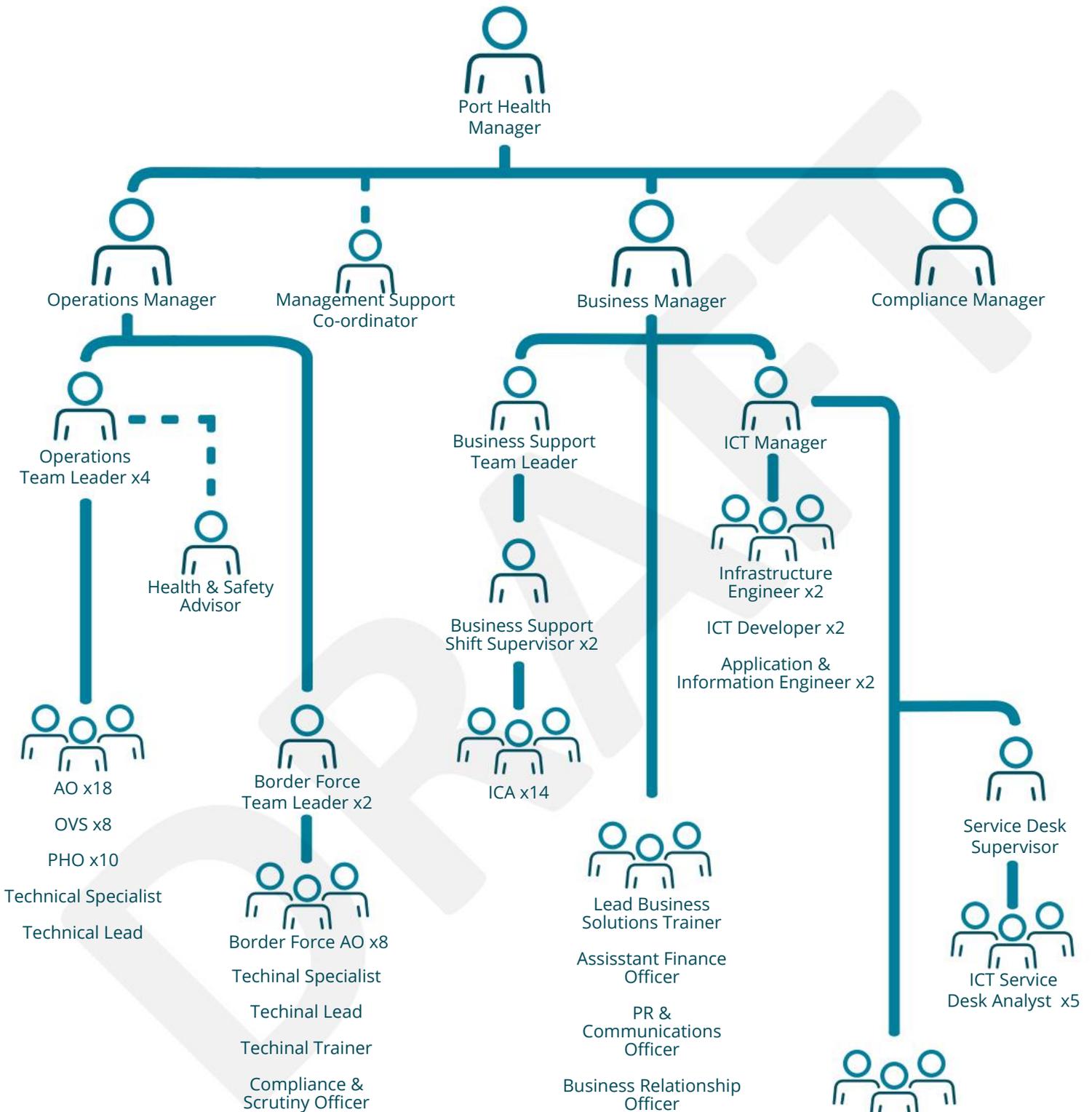
Appendix 2

Food and Safety Team organisational chart.



Appendix 3.

Suffolk Coastal Port Health Authority organisational chart.

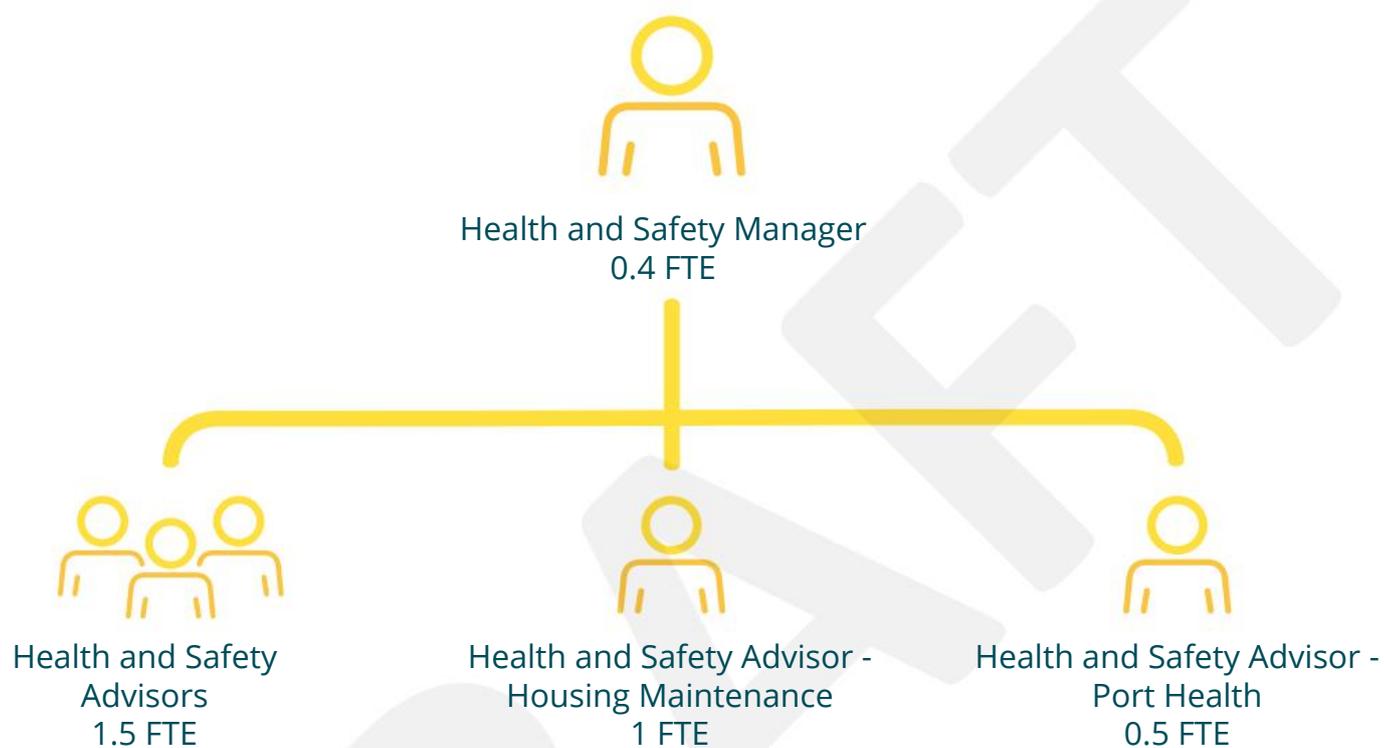


Job title key:

- ICA - Import Control Assistant
- AO - Authorised Officer
- OVS - Official Veterinary Surgeon
- PHO - Port Health Officer

Appendix 4

Corporate Health and Safety Team organisational chart.



Appendix 5

Profiles of food establishments in East Suffolk according to risk at 1 April 2023.

Source: End of year return 2022/23

	A	B	C	D	E	New registrations	Outside	Total
Total in category	2	74	360	1011	1215	16	317	2995*

*This shows an increase of 125 food businesses in East Suffolk from 2021/23.

Appendix 6

Outline of projected food safety and health and safety service demands in 2023/24.

Table 1 - Food hygiene interventions due to 31 March 2024.

Category	Interventions (number)	Estimated time per intervention (hours)	Total time for interventions (number x hours)
A	2	6	12
B	72	6	432
C	222	4.5	999
D	640	3.5	2240
E	69	2.5	172.5
New Registrations*	400	4.5	1800
Total	1405	n/a	5655.5

*estimate

Table 2 - Other food safety and health and safety activities in 2023/24 (estimated).

Activity	Number of Activities	Time per Activity (Hours)	Total time
Lowestoft Port Health Authority Ships sanitation inspections	43	3	129
Revisits - food safety	21	2.5	52.5
Complaints - food	175	2	350
Food, shellfish and water samples	80	3	240
Gastrointestinal disease suspected case notifications anticipated requiring follow up	85	2.5	212.5
Food alerts for action	5	37	185
Requests for food safety advice/assistance	348	1.5	522
Export certificates/premises endorsements	50	2	100
Skin piercing registrations - premises	20	5	100
Skin piercing registrations - personal	40	3.5	140
Asbestos Notifications	15	3.5	52.5
Health and safety priority topic awareness raising work	2	40	80
Health and safety advice/assistance	50	7	35
Health and safety complaints	56	3	2
Lifting Operations and Lifting Equipment Regulations - reports of defects involving an existing or imminent risk of serious personal injury	5	7	35
Smokefree enforcement	1	2	2
Freedom of Information/Environmental Information Regulations requests	20	10	200
Authorised officer Continuing Professional Development	20	12	240
Health and safety priority topic enforcement work, public events, Temporary Event Notices, pavement licences, imported food, other enforcement, report writing, myConversations, procedure updating, officer training and development, peer review, team meetings, student training, providing information and returns to government departments, auditing, media enquiries, service plan preparation, website updating, recruitment, working groups etc.			Work to be Prioritised

Appendix 7

Suffolk Coastal Port Health Authority's outline of current and projected service demands.

Please note that all figures are approximations.

Port of Felixstowe consignments (April 2022 to March)

	Current	Projected 2024 increase based off current BTOM info	Total including projection
Products of Animal Origin (PoAO)	19,502	9,171 to 57,200	28,673 to 76,702
High risk food of non-animal origin (HRFNAO)	5,462	0	5,462
Illegal, Unreported and Unregulated fishing (IUU)	3,397	250	3,647
Plastic	535	NYK	NYK
Organic	950	NYK	NYK

Harwich International Port consignments (April 2022 to March 2023)

	Current	Projected 2024 increase based off current BTOM info	Total including projection
Products of Animal Origin (PoAO)	0	9,404 to 76,800	9,404 to 76,800
High risk food of non-animal origin (HRFNAO)	45	0	45
Illegal, Unreported and Unregulated fishing (IUU)	250	600	850
Plastic	0	NYK	NYK
Organic	1	NYK	NYK

Total consignments (April 2022 to March 2023)

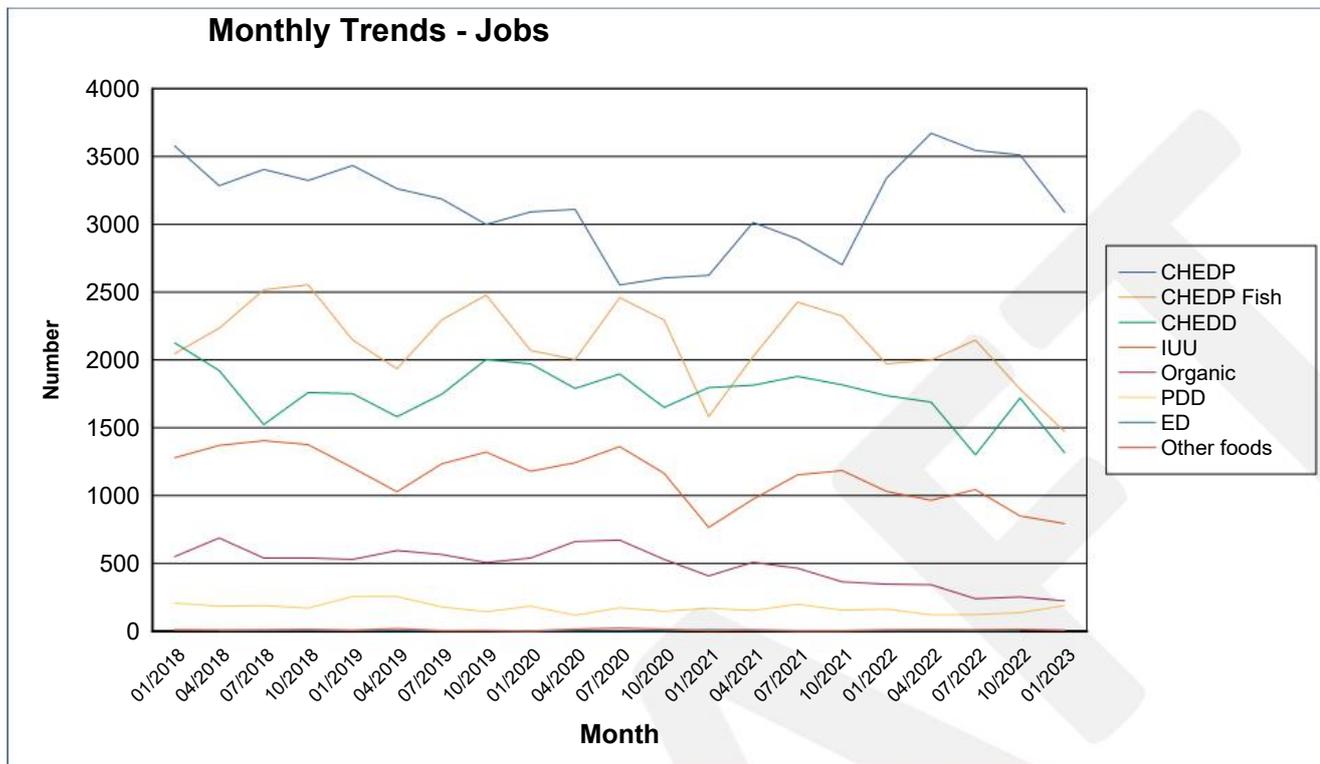
	Current	Projected 2024 increase based off current BTOM info	Total including projection
Products of Animal Origin (PoAO)	19,502	18,575 to 134,000	38,077 to 153,502
High risk food of non-animal origin (HRFNAO)	5,507	0	5,507
Illegal, Unreported and Unregulated fishing (IUU)	3,647	850	4,497
Plastic	535	NYK	NYK
Organic	951	NYK	NYK

NYK: Not yet known

Appendix 8

Suffolk Coastal Port Health Authority outline of service activities.

Suffolk Coastal Port Health Authority service activities (April 2022 to March 2023)	Products of Animal Origin (POAO)	Products of Non- Animal Origin (NAO)
Checks performed at point of entry into the UK		
Number of food consignments entering the Port	24,782	26,641
Percentage of manifests checked	100%	100%
Document checks for food consignments	24,396	25,418
Identity checks for food consignments	12,394	1,367
Physical checks for food consignments	3,382	1,280
Document checks for food consignments at external temporary storage facilities	0	0
Identity checks for food consignments at external temporary storage facilities	0	0
Physical checks for food consignments at external temporary storage facilities	0	0
Rejected food consignments	142	77
Reasons for rejection		
Microbiological contamination	0	4
Other contamination	0	2
Composition	1	31
Labelling	44	3
Other	97	35
Rejected consignments subject to:		
Destruction	67	48
Special treatment or processing	0	3
Re-dispatch	75	22
Repurpose excluding human consumption	0	4
Sampling activities		
Samples taken for microbiological examination	62	60
Unsatisfactory samples from microbiological examination	6	6
Samples taken for chemical/compositional analyses	352	1,097
Unsatisfactory samples from chemical/compositional analyses	5	68
Other samples taken	59	85
Other unsatisfactory samples	3	5
Formal enforcement		
Notices served	142	77
Voluntarily surrendered goods	145	0



Appendix 9

Food Sampling Policy - Food and Safety Team.

This food sampling policy is made available to businesses and consumers in accordance with the Food Law Code of Practice. We recognise the contribution sampling can make to the protection of public health and food law enforcement functions. We are committed to providing the resources necessary to carry out a sampling programme. Trained Authorised Officers are responsible for undertaking our food sampling functions and we have a food sampling programme for microbiological and algal toxin purposes. Food sampling is prioritised to concentrate upon one or more of the following criteria:

- foods which are produced within East Suffolk
- the risk ratings of the premises
- any local, regional or national coordinated sampling studies
- shellfish classification and algal toxin monitoring.

The majority of samples taken are for the purpose of monitoring, surveillance and intelligence gathering. Samples may be formal, informal or both according to circumstances. They are taken in compliance with the relevant Code of Practice and consideration of our Compliance and Enforcement Policy. Official laboratories as designated by the FSA are used for samples obtained during the sampling programme.

The UKHSA laboratory, London, the council's Public Analyst(s), CEFAS laboratories at Lowestoft and Weymouth and other accredited laboratories are used for the analysis of samples.

The FSA funds sampling credits used for the analysis of food samples submitted to the Food, Water & Environmental Microbiology Laboratory (UKHSA), London. Algal toxin examinations carried out by CEFAS are carried out at no charge to the local authority. The local authority has a budget to fund the analysis of shellfish classification samples as this is not funded by the FSA.

Samples may be taken during manufacturing/production processes, for the purposes of ensuring food safety and for ensuring the effectiveness of the critical controls in the process. Sampling may include swabs taken from surfaces where they are sent to an official control/accredited laboratory. The food business operator will be notified of the result of any such sample analysis or examination.

We do not currently act as the Primary Authority for any food business, but we act as the home authority for businesses where the relevant decision-making base of an enterprise is located within East Suffolk's area. Where sampling identifies a problem with food manufactured outside the districts, the relevant primary, home or originating authority will be notified, and a copy of the certificate of analysis or examination forwarded to them.

Food sampling will not normally be undertaken as a constituent part of a food safety intervention. It may take place if, during the intervention, the authorised officer identifies a particular problem that needs further investigation.

Samples of food received as a food complaint may require microbiological examination, chemical analysis or expert identification.

Where a particular premises or food produced in the District is implicated with a case or cases of foodborne disease, food samples may be taken and submitted for examination, for the purpose of identifying any likely source of infection and controlling any risk to public health.

Food samples may be taken and submitted as part of a special investigation e.g., in response to a food hazard warning, or to other intelligence received about potential food safety issues.

The sampling of shellfish and river water in commercial shellfish production areas is conducted in coordination with the FSA and CEFAS for the purpose of maintaining the necessary classifications for those areas and for monitoring the risk of algal toxins. Shellfish and river water is sampled from shellfish beds and their associated depuration plants.

Appendix 10

Suffolk Coastal Port Health Authority outline of sampling activities 2021/22 and 2022/23.

PASS - Wolverhampton	707
Food & Environmental Research Agency	255
SGS Cambridge Limited	533
Kent Scientific Services	134
UKHSA	99
Other	157
Total	1,885

Appendix 11

Gastrointestinal disease confirmed cases in East Suffolk 2021/22 and 2022/23.

Table 1 – Gastrointestinal disease confirmed cases in East Suffolk, April 2021 to March 2023.

Source: East of England HPT, UKHSA

Laboratory reports	2021/22	2022/23
E coli O157 VTEC	6	0
Salmonellosis	18	32
Giardiasis	9	9
Shigella dysentery	2	3
Total	45	52

Table 2 – Gastrointestinal disease confirmed cases in East Suffolk, April 2021 to March 2023, rate per 100,000 population.

Source: East of England HPT, UKHSA

Laboratory reports	2021/22	2022/23
E coli O157 VTEC	14.81	0.00
Salmonellosis	44.42	78.98
Giardiasis	22.21	22.21
Shigella dysentery	4.94	7.40
Total	111.06	145.61

Appendix 12

Key liaison organisations, including:

- government departments, agencies and public bodies
- operational and service delivery organisations
- other organisations and working groups.

	- Food and Safety Team
	- Suffolk Coastal Port Health Authority
	- Corporate Health and Safety Team

			
Animal and Plant Health Agency	✓	✓	
Associated British Ports	✓	✓	
Border and Protocol Delivery Group		✓	
Border Force		✓	
BSI – British Standard Institute		✓	
Business Associations	✓	✓	
Cabinet Office		✓	
Campden BRI	✓		
Care Quality Commission	✓		
Chambers of Trade and Commerce	✓		
Chartered Institute of Environmental Health	✓	✓	
Commercial bodies, traders (imports / agents), liaison groups, trade bodies		✓	
Courts and Tribunals Judiciary (including Coroner and Coroner's Office)	✓		
DEFRA Imports and Exports Division	✓	✓	
DEFRA International Trade Division		✓	
Department for Business, Energy & Industrial Strategy	✓		
East of England Ambulance Service NHS Trust	✓		✓
East of England Health Protection Team, part of the UK Health Security Agency	✓	✓	
Eastern Region Corporate Health and Safety Group			✓
East Suffolk Council's Corporate Teams e.g. HR, finance legal services, licensing, planning and building control	✓		
Environment Agency	✓		
Fire and Rescue Service	✓		✓
Food and Environmental Research Agency		✓	
Food Standards Agency	✓	✓	
Food, Water and Environmental Microbiology Services, part of the UK Health Security Agency	✓	✓	

	Green	Blue	Yellow
Forestry Commission		✓	
Health and Safety Executive	✓		✓
His Majesty's Inspectorate		✓	
His Majesty's Revenue and Customs		✓	
Home Office Security Industry Authority	✓		
Inshore Fisheries and Conservation Authorities	✓		
Institute of Occupational Safety and Health	✓		✓
Laboratory of the Government Chemist		✓	
Local authorities and port health authorities	✓	✓	✓
Marine Management Organisation	✓	✓	
Maritime and Coastguard Agency	✓	✓	✓
Medicines and Healthcare Products Regulatory Agency		✓	
National Health Service	✓		✓
New Anglia Growth Hub	✓		
Norfolk and Suffolk Health and Safety Liaison Group	✓		
Office for Standards in Education, Children's Services and Skills (Ofsted)	✓		
Plant Health and Seeds Inspectorate		✓	
Public Analysts	✓	✓	
South East Shellfish Liaison Group	✓		
State Veterinary Service		✓	
Suffolk and North Essex Occupational Safety Group			✓
Suffolk Constabulary	✓		✓
Suffolk Food Liaison Group	✓		
Suffolk Joint Emergency Planning Unit	✓		
Suffolk Public Health	✓	✓	
Suffolk Resilience Forum	✓		
Suffolk Safeguarding Partnership	✓		
Suffolk Trading Standards	✓	✓	
Waveney Safety and Environment Group			✓

Appendix 13

Customer satisfaction in 2021/22 and 2022/23.

Business satisfaction responses: 75 in 2021/22* and 133 in 2022/23						
		Strongly agree	Agree	Neither agree/disagree	Disagree	Strongly disagree
I felt my business was treated fairly	2021/22	78.67%	17.33%	1.33%	1.33%	1.33%
	2022/23	79.70%	18.80%	0.00%	0.75%	0.75%
I felt the contact was helpful	2021/22	75.68%	21.62%	1.35%	0.00%	1.35%
	2022/23	84.21%	14.29%	0.00%	1.50%	0.00%
Communication was clear	2021/22	76.32%	18.42%	5.26%	0.00%	0.00%
	2022/23	82.71%	15.79%	0.00%	0.75%	0.75%

*SurveyMonkey was paused in 2021/22 due to the COVID-19 epidemic.

Appendix 14

Summary of food interventions, enforcement actions and compliance data for East Suffolk in 2021/22 and 2022/23.

Source: End of Year Return

Food safety interventions		2021/22	2022/23
Total % of interventions achieved by premises category. Interventions include inspections and audits, verification and surveillance, sampling visits, advice and education visits, and information/ intelligence gathering.	A	100%	100%
	B	97%	100%
	C	90%	99%
	D	93%	98%
	E	36%	26%
	New Registrations	260 (number)	474 (number)
Other activity		2021/22	2022/23
% food businesses broadly compliant with legislation		92%	97%
No. of establishments subject to:			
Written warnings		852	606
Improvement Notices		0	0
Emergency Prohibition Notices		0	0
Prohibition Orders		0	0
Voluntary closures		1	1
Seizure, detention and surrender of food		0	0
Remedial Action Notices		0	0
Prosecutions		0	0
Simple cautions		0	0
Suspension/ revocation of approval		0	0
Samples taken		87	138
Complaint investigations - food		139	116
Complaint investigations - hygiene of premises		99	90

Appendix 15

Food safety and health and safety additional statistics for 2021/22 and 2022/23.

Activity	2021/22	2022/23
Service requests		
Food safety advice/assistance	349	346
Food registrations/changes to registrations	434	372
Ship sanitation certificates	56	19
Food Export Health Certificates and Attestations	13	49
FHRS safeguards		
Revisit requests	20	22
Right to Reply requests	0	0
Appeals - upheld	0	0
Appeals - not upheld	1	2
Appeals - over 21 days	0	0
Early publication of FHRS rating	4	2
Skin piercing registrations		
Skin piercing registrations - premises	13	21
Skin piercing registrations - personal	30	40
Health and safety advice/assistance/complaints		
Health and safety advice/assistance	34	50
Health and safety complaints	54	58
Asbestos		
Asbestos Notifications (ASB5)	33	1
Lifting Operations and Lifting Equipment Regulations reports		
Lifting Operations and Lifting Equipment Regulations - reports of defects involving an existing or imminent risk of serious personal injury	2	6
Freedom of Information/Environmental Information Regulations requests		
Freedom of Information/Environmental Information Regulations requests	62	20
Events notifications requiring assessment and, where necessary, further investigation/comment		
Public events	88	177
Temporary event notices and pavement licences	483	623
Event premises licences	110	116

Appendix 16

LAE1 local authority health and safety return summary 2021/22 and 2022/23.

LAE1 criteria	2021/22	2022/23
Proactive inspections	50	22
Non-inspection interventions	18	15
Any other targeted contact (not face to face) to educate, advise or engage duty holders	86	148
Reactive visits	61	36
Revisits following earlier intervention	0	1
Improvement Notices	0	2
Deferred Prohibition Notices	0	0
Immediate Prohibition Notices	0	3
Simple cautions	0	0
Prosecutions resulting in conviction	1	0

Appendix 17

Summary of food interventions data for East Suffolk 2021/22 and 2022/23.

Food safety interventions	Premises category	Interventions carried out in 2021/22	Carried forward	Interventions carried out in 2022/23	Carried forward
Total number of interventions carried out by premises category.	A*	10	0	8	0
	B*	96	3	80	0
	C*	332	26	226	3
	D	844	109	428	14
	E	238	234	197	274
	New registrations*	260	80	474	11

*Food Standards Agency priorities required by COVID-19 Recovery Plan.

Interventions include inspections and audits, verification and surveillance, sampling, advice and education visits, and information/intelligence gathering.

Appendix 18

Corporate complaints received in 2021/22 and 2022/23.

Corporate complaint statistics: 1 April 2021 to 31 March 2023					
		Total complaints	Justified	Unjustified	To be determined
Food and Safety Team	2021/22	4	0	4	0
	2022/23	0	0	0	0
Suffolk Coastal Port Health Authority		<p>To solve customer concerns swiftly, SCPHA accept complaints about its services directly via email. These complaints are investigated by staff independent to the import(s) in question.</p> <p>If the customer is not satisfied after an investigation has concluded, they are directed to the East Suffolk Council complaints system, with potential for review from another service area if required.</p>			
Corporate Health and Safety Team	2021/22	0	0	0	0
	2022/23	0	0	0	0

Appendix 19

Food and Safety Team Alternative Enforcement Strategy for low-risk food establishments.

This Alternative Enforcement Strategy (AES) sets out the arrangements adopted by East Suffolk Council for conducting official controls at food establishments rated as low risk in accordance with the Food Standards Agency's Food Law Code of Practice (FLCoP) and Practice Guidance.

Low-risk food establishments are defined as those with a category E food hygiene rating, as detailed in Annex 1 of the FLCoP.

The AES is not used for food establishments subject to approval under Retained EU Law Regulation No 853/2004 or those which export food. Establishments subject to approval or those exporting food, including those with a category E food hygiene rating, are subject to official controls at a frequency appropriate for their food hygiene rating in accordance with Annex 1 of the FLCoP.

Food establishments with a category E food hygiene rating, which are not broadly compliant with relevant food legislation, are subject to official controls until they achieve a broadly compliant standard. An establishment is considered broadly compliant if it achieves a minimum food hygiene rating of 10/10/10 for the level of (current) compliance for hygiene/structure/confidence in management and control procedures, as detailed in Annex 1 of the FLCoP.

All newly registered (and unrated) food business establishments are subject to an initial inspection in accordance with Chapter 4 of the FLCoP. These establishments are risk rated in accordance with Annex 1.

The AES does not preclude official controls of low-risk establishments: full inspections, partial inspections and/or audits of low-risk establishments may be undertaken where these are East Suffolk Council's preferred intervention option. Official control interventions may be conducted at establishments subject to the AES where there has been:

- a consumer complaint
- planning or building regulation applications
- an infectious disease notification
- changes in activities or management
- a non-return of a questionnaire
- insufficient information returned by questionnaire
- a food alert requiring action.

Questionnaires are sent to appropriate category E establishments within 28 days of the due date for the intervention. Upon return, completed questionnaires are assessed by an Authorised Officer (AO) for any significant changes to the establishment's arrangements and/or activities including:

- changes of food business operator and/or management
- changes in food operations such that the inherent risk or hygiene risk to public health may have increased
- major changes to the structure/layout of the premises.

Where questionnaires are not returned by the establishment within 28 days or require further investigation to establish whether significant changes have occurred, the AO will contact the premises by email or by undertaking a monitoring or surveillance visit to obtain the required information.

The risk rating of category E food establishments is reviewed by an AO after every episode of surveillance in accordance with the AES. Where there are no changes, the AO will enter the same risk-rating onto the database, thus ensuring the establishment remains on the food hygiene intervention programme. The FSA's Food Hygiene Rating for the food establishment remains unchanged.

Official control interventions will be conducted in low-risk establishments in accordance with Chapter 4 of the FLCoP and in any or all of the following circumstances:

- insufficient information has been returned on the AES questionnaire
- significant changes to the food establishment have occurred
- the risk appears to have changed.

Surveys and project-based interventions of low-risk establishments are conducted in accordance with national, regional and local needs, initiatives and priorities.

Records of all AES activities are maintained on East Suffolk Council's food and safety database and the information gathered is used to maintain up to date records of all low-risk food establishments.



FULL COUNCIL

Wednesday, 22 November 2023

Subject	Cabinet Members' Report and Outside Bodies Representatives' Report to Council
Report by	Councillor Caroline Topping Leader of the Council

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
Wards Affected:	All Wards
Purpose of Report: To receive the Cabinet Members' Report and the Outside Bodies Representatives' Report to Council, for information.	
Options: Not applicable.	

Cabinet Members' Reports to Council

Cabinet Member:	Councillor Caroline Topping, Leader of the Council
Contact Details:	caroline.topping@eastsoffolk.gov.uk Tel: 07825 421117

DEMOCRATIC SERVICES

Katy Cassidy joined us at the end of October as a Democratic Services Officer with a wealth of experience in facilitating meetings having worked in Education for the last 27 years. This means we are now fully staffed and both Katy and Lorraine Fitch, the new Democratic Services Manager, have been warmly welcomed by Members and Officers.

Matt Makin has been shortlisted for the Learner of the Year Award by the Association of Democratic Services Officers after completing the Certificate in Democratic Knowledge. The winner will be announced at their conference on 23 November.

LEGAL SERVICES

We undertook a planning prosecution after the defendant failed to comply with an Enforcement Notice relating to use of the grounds of a residential address to store building materials. The defendant was found guilty and fined £4,400.

We also provided advice to the Planning Enforcement team on the issuing of a Temporary Stop Notice in Witlesham because the developer had not carried out essential drainage works prior to construction.

The Grant Agreement in relation to the Feel Good Suffolk arrangement was completed between Suffolk County Council and all the other local authorities in Suffolk and we also completed the Lease for the Annex to Suffolk County Council.

Routine legal work, including providing legal advice at Licensing Sub-committee hearings and advising the Housing and Planning teams on various issues is ongoing. We continue to also provide assistance to Port Health and the Coastal Protection team.

COMMUNICATIONS

Our communications and marketing activities continue to help us explain what we are doing (and why), to a variety of different audiences. By doing this we are able to create greater awareness of, and improve trust in, our decisions, services and activities.

We use a range of different channels to communicate with our audiences including the local, regional and trade media and online through our social media channels and website. We are, however, conscious of the need to engage with those who are harder to reach and we are currently producing our second residents' magazine of 2023, which will be delivered to every household in the district before the end of the year.

Meanwhile, our social media performance goes from strength to strength, with increasing engagement on all channels including Facebook, Twitter, LinkedIn and Instagram. Our most

recent figures show that we enjoyed over 70,000 engagements with people during the past calendar month alone.

Specific, recent communication activities include the support provided to local residents, Members, the media and other stakeholders in relation to Storms Babet and Ciarán. Good communications and regular messaging are hugely important for anyone affected and we worked hard to ensure information was disseminated effectively, thoroughly and as quickly as possible. As a result of the joint effort by all involved, media reporting of our role and the role of East Suffolk Services was generally positive.

Key communications and marketing activities have also played their part in the development of 'Our Direction 2028', our new strategic plan, including the entire design process of a new brand identity and the promotion and support for various engagement events and activities. Our wider efforts on brand and design are being accelerated as part of a clear strategic drive to create greater recognition and awareness of what we do. By improving our efforts in this area, we are able to develop more impactful messaging which genuinely 'cuts through' and encourages increased take-up of our services.

Among a range of different campaigns which we continue to deliver, our cost-of-living programme 'Ease the Squeeze' is being heavily supported and promoted by targeted activity, both online and offline, to ensure maximum awareness of the services we offer in the most effective way possible.

Cabinet Member:	Councillor David Beavan, Deputy Leader and Cabinet Member with responsibility for Housing
Contact Details:	david.beavan@eastssuffolk.gov.uk Tel: 01502 724904

HOUSING REPAIRS AND MAINTENANCE

We are in the final stages of completing four of our schemes. These schemes were under Notices of Deficiencies or Enforcement Notices from the Suffolk Fire and Rescue Service. The Notice of Deficiencies have now been removed from two of our schemes and we only have an Enforcement Notice on one retired living scheme and St Peter's Court.

The overall fire risk at St Peter's Court has now reduced to 'Moderate' and we are working hard to carry out design and specification work for the remaining schemes that require compliance works and these will go out to tender in the new year.

We are in the process of forming a new Caretaking Service that will be rolled out across our stock and until this is in place, we will be the eyes and ears on the ground and will regularly inspect communal areas for cleanliness and ensure that exit routes are kept clear. We have a zero-tolerance approach to items left in communal areas that block routes.

On 2 November a new Inspector joined the team who will focus solely on damp and mould reports. With a dedicated Inspector in place, we are confident we can provide an improved and consistent service.

Our Rotterdam Road Depot now has a portacabin in place which allows office-based staff to work on site and be more accessible to the operatives.

HOUSING INVESTMENT

We remain focussed on improving the efficiency and delivery of the Housing Revenue Account Investment Programme. Our Strategic Lead for Housing Investment (Bridget Law) started her maternity leave on 10 November, but we have made an internal appointment to cover the main elements of her role until Bridget returns.

Elliott Dawes has been promoted to the role of Development Programme Manager and will be supported by a newly appointed Senior Development Officer.

The consultation process for three Stock Condition Surveyors commenced on 31 October and these appointments will increase the pace of the much needed stock condition work which is already underway. The Housing Estates Surveyor role, previously held within the Asset Management team, has now transferred to Housing Investment with the intention of increasing our property work programme in 2024, including asset reviews.

The launch of ProVal, financial viability software for social housing providers, has now been implemented. We have been developing several template models to help inform investment decisions. The capability of the software provides far greater opportunity to review different scenarios and uses sensitivity analysis to test options and inform recommendations.

We continue to work with Homes England on strategic sites including the former Sanyo and Survitec sites in Lowestoft and are delighted to have been awarded over £4m in funding via the Brownfield Land Release Fund which will fund decontamination and remediation of these sites in readiness for housing delivery. This was the highest grant award in the UK and work has commenced via a national framework to appoint a specialist remediation contractor. The procurement of a design team to bring forward development proposals for the site will commence in December.

Development Programme Summary – there has been a small increase in properties due to be completed through Section 106, acquisitions, new build and redevelopment in 2023/24 (from 22 to 25). Of these, 22 are affordable rent and 3 are shared ownership Lowestoft. We are currently in the process of selling the last shared ownership unit - part of Phase 1 of the Jubilee Park development in Wrentham. Good progress is also being made on site with our development at Milton Road East in Lowestoft which will look to deliver six of the above affordable homes.

There will be a significant increase in 2024/25 with 111 properties planned for completion through new build and redevelopment. Of these, 60 will be affordable rent, 16 shared ownership and 13 units of temporary accommodation. Within the live development programme, 10 projects have received full planning consent with 2 others having received a positive pre application response. There is currently 1 development awaiting decision.

Capital Programme Summary – of the initial stock condition surveys commissioned (27% of our stock), we have completed 593 since August 2023. The remaining 73% will be carried out by a combination of external companies and internal Stock Condition Surveyors.

<i>Stock Condition Summary – 7 November 2023</i>	
<i>Contract/Project start date</i>	<i>August 2023</i>
<i>Contract/Project end date</i>	<i>March 2024</i>
<i>Target number of surveys to be completed</i>	<i>1104</i>
<i>Number of surveys completed to date</i>	<i>593</i>
<i>Number of surveys still to complete</i>	<i>511</i>
<i>Expected completion date for remaining surveys</i>	<i>March 2024</i>
Commentary	
<p>Access has started to become more prevalent in recent weeks. We have 2 active consultant surveyors on the project and are forecast a further 300 surveys to be completed by the Christmas break - this will give us a total of 893 surveys completed representing 80% of the list surveyed. This is dependent on access. We are currently on 54%.</p>	

The tender for a Specifier Consultant closed on 9 November and the tender evaluation took place on 14 November. This appointment will allow faster delivery of capital work programmes.

After the success of the iOpt sensor trial, we are receiving valuable data as we move into the Winter months. We have commenced work to roll out a wider programme of sensor installation and are currently prioritising where sensors will add most value to our housing data and have assessed other monitoring systems on the market. iOpt, Switchee and AICO have been invited with AICO being the preferred system for roll out at this time.

Property Programme Summary – this area is still currently under resourced but notwithstanding this, we have commenced work to develop the necessary processes to review longer term empty or problematic properties. The creation of a Building Asset Review Board is being developed and will be underpinned by the emerging Housing Revenue Account Asset Management Strategy. Property expertise is still required to support this area with the Property team working alongside the Capital Programme Manager and Development Manager to recommend and deliver significant asset regeneration projects. It is anticipated that the delivery of works identified will be carried out by the Development team with some of their focus shifting from new build to the redevelopment of existing assets.

We are currently progressing five acquisitions and recently completed on a property in Leiston. These properties are being purchased via Housing Revenue Account finances and external funding for specific client groups. We continue to review any properties presented to us for purchase including several Newtide disposals.

HOUSING SERVICES (COUNCIL HOUSING)

Work is continuing to resolve the historic overpayments of rent and heating service charges by tenants. A substantial quality assurance exercise has reviewed 12 years of forensic financial data and converted this into files that can be loaded onto our software systems. We are now working with the Anglia Revenues Partnership to correct the Housing Benefit payments for all affected tenants. We have identified 1,019 tenancies not affected by these

historic overpayments and we will be writing individual letters to these tenants to inform them of this.

HOUSING NEEDS

We continue to experience high levels of demand due to external pressures such as the cost-of-living crisis, the increase in private rentals, changes in welfare benefits and the freeze in Local Housing Allowance. We are actively supporting 477 households under Prevention, Relief or Main duties. The total number of applications on the Gateway to Homechoice register is currently 4,570. Since April we have housed 471 households through the register and have received 2,114 new applications over the same period.

We consistently work to improve positive outcomes and achieve homelessness prevention by focusing on early intervention and since April we have been able to prevent or relieve homelessness for 209 households. At the end of October, we had 118 households in temporary accommodation and predictions indicate that there will be a 48% increase in households being placed in temporary accommodation by the end of March 2024.

On 3 November we launched East Suffolk Lettings and attended our first formal event alongside colleagues from our Safe Suffolk Renters team and other Suffolk local authorities at the University of Suffolk, Ipswich. This provided a fantastic platform for engagement with private sector landlords and organisations that are delivering similar services county wide. We are confident that this project will benefit us as we continue to provide clients with housing assistance.

We have also been successful in gaining further funding from the Department for Levelling up Housing and Communities (DLUHC), under the Prevention and Move On Fund, to support rough sleepers or those at risk of rough sleeping. We received £44,771 in addition to the Rough Sleeping Initiative bid award that we have until March 2025. This funding will provide additional assessment beds and tenancy training provided by the Stone Foundation to ensure those that are ready to move have the right life skills and can manage their tenancy when an offer of accommodation is made.

We were also successful in receiving additional funding in 2023/24 and 2024/25 totalling £36,278 to support our Target Priority Group - a small number of individuals who are the furthest away from ending their rough sleeping. We have created a plan on how this funding will be spent and this has now been approved by DLUHC. There are six in the current Target Priority Group but we do have a total of 12 rough sleepers - 3 of these have been offered a placement.

The Rough Sleeping Initiative Officer from DLUHC visited us on 2 November and we were able to show him a number of interventions offered under the Rough Sleeping Initiative and the feedback was incredibly positive.

PRIVATE SECTOR HOUSING

Safe Suffolk Renters held their first landlords' conference at the University of Suffolk on 3 November which was attended by over 100 landlords, property agents and other renting representatives. The feedback was positive and one landlord described the event as "very professional and collaborative". There is a short video available [here](#) if Members would like more information. The programme is now moving its focus to an area of West Suffolk for its

second pilot, working on properties that do not comply with minimum energy standards and Houses in Multiple Occupation.

Independent Living East welcomed a new manager after a recent restructure of the Private Sector Housing team and completed £1,012,280 of adaptations in the first 2 quarters of the year - a record achievement doubling the output for the same period last year and helping 225 residents compared to 117 last year. The changes can be attributed to the amended grant policy which provides grants to residents that are not means tested for up to £15k, a review and streamlining of procedures and the greater availability of contractors.

Cabinet Member:	Councillor Sarah Whitelock, Cabinet Member with responsibility for Communities, Leisure and Tourism
Contact Details:	sarah.whitelock@eastsoffolk.gov.uk Tel: 07824 452388

COMMUNITIES

21st Century Community Hubs programme – our new 21st Century Community Hubs programme is funded through the Rural England Prosperity Fund. The scheme offers a great opportunity for community ‘hubs’ across the district to think big and make changes to meet the needs of their community in 2023 and beyond. Capital grants of up to £30k are available with only a 20% match funding contribution required (of which 10% can be volunteer time).

Projects eligible for funding include:

- 1) **digital upgrades** eg helping community members to engage with digital devices, community-use internet hubs, internet cafés and/or internet installation, connection and line upgrades for community use;
- 2) **physical improvements** to buildings to enable community food projects - shops, pantries and/or fridges, community-led repair cafes/mend workshops, additional/enhanced space for meetings, health and wellbeing, educational, sports and fitness, arts or cultural activities, skills and employment training, community cafés, co-working spaces and improving building accessibility;
- 3) **net zero projects** including low carbon heating systems, installation of low and zero carbon generating technologies eg solar PV, biomass or micro-wind, improving insulation, replacement windows/doors etc to improve the energy efficiency of buildings and Biomass and ASHP/WSHP heating systems.

It would be great if all Members could help us to promote the scheme within rural East Suffolk but please ensure that potential applicants know that this isn't about ongoing maintenance or replacement costs eg replacing a roof or resurfacing a car park, but about making changes to a building that will enable it to meet a wider range of community needs. This is a great opportunity for the focal points that we all have in our communities - the next funding round opens in December and closes at the end of January 2024 and practical advice and support is available through Community Action Suffolk.

Cultural Volunteering - Cultural Connections is a legacy of our bid with Great Yarmouth Borough Council for City of Culture 2025 and is funded by the post-London Olympics 'Spirit of 2012' fund. The aim is to encourage new volunteering in the Culture, Heritage and Arts sectors by helping to overcome the barriers to getting involved that prevent people from enjoying the benefits of volunteering eg lack of transport, caring responsibilities or personal, social and health challenges. Since June, Cultural Connections has signed up 60 new volunteers, some of whom have already been taking part at events ranging from Folk East to the Saxmundham Community Allotment's first ever Tomato Festival, as well as marshalling Love Felixstowe week and the Tour of Britain cycle race.

If you, or someone you know, would like to get involved with the project, or have an event you'd like to propose, please do contact Matthew Townshend (matthew.townshend@eastsoffolk.gov.uk / 07775 018844). Sign up to join the Cultural Connections family at www.culturalconnectionsvolunteering.org.uk.

Uniform Banks - as the cost-of-living increases, so too does the cost of necessary purchases such as school uniform. We are partnering with local Voluntary, Community, Faith and Social Enterprise (VCFSE) sector organisations to support the opening or expansion of Uniform Banks in each of the eight Community Partnership areas and have already funded schemes in Lowestoft, Felixstowe, Carlton Colville and Beccles. The Uniform Banks ask for donations of new or clean, good quality, second hand uniform, sportswear and equipment. Families can then access the uniforms, for which there is no/minimal charge. This model means that children whose families are on a low income are able to participate in the life of the school in an equal way to their peers. Uniform Banks also prevent clothing waste. Some partners are expanding into interview clothing and/or prom wear if they have the capacity/there is a need within their community. Uniform Banks engage with families so that they can access further support if required. The second funding round is now live and grants of up to £3k are available.

Faith in Partnership - on 10 October we held our first Faith in Partnership event at East Suffolk House. More than 50 people from faith communities, other VCFSE organisations, local government and health bodies came together to look at how we could build stronger partnerships in order to serve our communities. This is the first step of working even closer with our faith sector partners so watch this space for more updates.

LEISURE

Coastal (Leisure) Strategy - following the adoption of the Leisure Strategy, we commissioned Knight, Kavanagh and Paige Limited (who created the Leisure Strategy), to create a Coastal Strategy for sports and leisure activities in East Suffolk. This will cover water activity, both formal and informal. Whilst this isn't part of the Sport England requirement, the inclusion of our coastline was considered an additional aspect that would be of benefit to the Leisure Strategy. A survey has been developed and will be sent out to clubs and organisations involved in water sports and there will be a public survey to look at informal water activity. This information will then be used to help create a Coastal Strategy for the district and may help clubs and communities with funding applications.

Play Opportunities - following Cabinet's approval of the Play Action Plan in July, the Leisure team are finalising the draft survey that will be circulated to Town and Parish Councils due to receive play improvements in their area in 2023/24. The survey will also be sent out to local communities, schools etc and the feedback will be used to inform the design tenders.

Honour Run – this is an annual event organised in partnership with the Royal British Legion Poppy Appeal. It took a break in 2022 but the team has been approached to help organise the 2024 event as part of the D-Day 80th anniversary commemorations. Tentative planning is underway for this, but the expectation is that it will take place on Sunday 9 June 2024 at Rock Barracks, Woodbridge with options for a half marathon or 10k/5k fun runs.

Strength and Balance – we are working with providers, including Places Leisure and ActivLives, to develop strength and balance programmes for the over 65s living with frailty. Places Leisure currently delivers three weekly sessions in Leiston, Woodbridge and Felixstowe with plans to expand into other areas and add more sessions. ActivLives is delivering its 'Step by Step' programme across the district. We are also working closely with health partners and the newly appointed Strength and Balance Development Officer at Active Suffolk to create new referral pathways and increase the numbers accessing the programme.

We have asked our leisure operators to look at opportunities to increase their offer across the district, particularly regarding Reformer Pilates which helps older people with their strength and balance. This type of Pilates is particularly good for post-menopausal women because it increases bone and muscle strength with sessions taking place in a more private environment.

Healthy Behaviours/Feel Good Suffolk - Feel Good Suffolk launched on 2 October and so far, East Suffolk has received over 350 referrals for support with weight management, smoking cessation and increased physical activity. Health and Wellbeing Officers, Matt and Amy, are working closely with local authority and health partners across Suffolk to develop these services over the coming months. Clients have been able to access weight management support through Slimming World vouchers and physical activity support delivered by Places Leisure and Everyone Active. We are currently finalising our smoking cessation offer.

TOURISM

Seashore Village – this new tourism development was completed in October and brings to fruition a wider regeneration project on the land between Sea Road and the Promenade in Felixstowe. The main site provides five unique 'pod style' units for hire which are fully accessible. In addition, there are 27 new traditional timber-built huts for sale along with a brand new, fully accessible changing places toilet block. As part of the development, the nearby car park has also been remodelled to provide better access and with parking bays in close proximity to the Village and pods. Our neighbouring activity park opened in time for the Summer holidays and features climbing walls, an outdoor gym, outdoor table tennis, chess tables, an exercise space and public seating. Whilst fully open to the public, there will be a soft launch event in December and a more targeted launch of the new pods in Spring. These developments show that thoughtful development of our assets can support the local visitor economy and also create new facilities for residents.

Landguard Gateway project - following agreement to lease our Landguard Nature Reserve in Felixstowe to the Landguard Trust, they have now developed the Landguard Gateway project proposal. This includes the creation of a new entrance to the Nature Reserve reducing visitor pressure on the existing entrance, the creation of a new wetland habitat/wildlife garden and converting shipping containers into a multi-use indoor classroom for use by the local community, schools and visitors. The project will generate significant biodiversity net gain, create a new visitor asset that links to existing and future visitor developments in the area as well as new community facilities. Cabinet has given the Trust permission to undertake initial survey and design work and we will continue to work closely with them as the project develops.

SZC Tourism Mitigation Programme – we have negotiated a £12m tourism mitigation package to help minimise and mitigate the impacts of the Sizewell C development on the local visitor economy during the construction phase. In anticipation of the Development Consent Order being triggered in January 2024, we are in the process of recruiting a Sizewell C Tourism Programme Manager who will develop, manage and deliver an extensive programme of activity to address the impacts on the visitor economy of this development. This programme will be developed with local partner organisations including Suffolk County Council, the Suffolk Coast Destination Management Organisation, Suffolk Coasts and Heaths, Visit Suffolk and Sizewell C. The Programme Manager will also chair the Tourism Working Group which forms part of the wider governance structure for Sizewell C. This Group will support the development of annual implementation plans which will cover areas such as tourism promotion, visitor experience development, tourism asset development, tourism business support and research/monitoring. The Group will commence early in the new year with the first implementation plan being developed within 3 months of this first meeting.

Cabinet Member:	Councillor Jan Candy, Cabinet Member with responsibility for Community Health
Contact Details:	jan.candy@eastssuffolk.gov.uk Tel: 07823 587492

LICENSING SERVICES

We have finalised the Statement of Licensing Policy which was approved by the Licensing Committee and is now being recommended to Full Council for adoption.

Since 1 September 2023 there have been 12 licensing hearings dealing matters relating to drivers, film classification and allegations of serious crime and disorder at a premises. In addition, we have successfully defended an appeal to the Magistrates’ Court against a Sub-Committee decision to revoke a driver’s licence. The driver has since appealed to the Crown Court.

Taxi and Private Hire licensing was reviewed by Scrutiny Committee at its September meeting and the Licensing Committee has since considered their recommendations. As a result, a request for resources will be made for an additional Licensing Enforcement Officer and the team will consider ways to alleviate the financial burden for drivers applying for a licence including grants, loan pay back schemes, staggered payments.

The team will also be reviewing our Street Trading Policy with a view to alignment across the whole district with selected prohibited streets where no street trading can take place.

HEALTH AND WELLBEING

Wellness on Wheels – our Community Help Hub Officers have been working in partnership with the NHS Wellness on Wheels bus in Lowestoft. The bus brings health care services to the community, offering residents an opportunity to engage with NHS services and partners such as social prescribers, the Terrence Higgins Trust, Headway, the Big C cancer charity, the National Literacy Trust, Northumbrian Water, the Department for Work and Pensions, Access Community Trust and many more. The last two ‘Grab a Jab’ sessions for 2023 will be held on 27 November and 12 December. Covid vaccination eligibility can be accessed below:

<https://www.nhs.uk/conditions/covid-19/covid-19-vaccination/getting-a-covid-19-vaccine/>

Wellbeing Hubs – the Live Well Hub in Leiston is now open following a launch event held on 20 October. Around 25 organisations attended to showcase what they offer locally, with lots of interest to start delivering from the hub in the future. Work has commenced to establish a Wellbeing Hub for Felixstowe with funding already in place via Suffolk County Council Public Health.

COMMUNITY SAFETY AND ANTI SOCIAL BEHAVIOUR

Felixstowe Impact Day – our Communities and Environmental Protection Officers were joined by their counterparts from Suffolk Constabulary, Suffolk Fire and Rescue Service and Trading Standards for the Impact Day on 17 October. This was organised by the East Suffolk Community Safety Partnership and funded through 2022/23 Enabling Communities Budgets. The event saw partner agencies conduct a series of checks and inspections aimed at strengthening community safety through collective activity. Trading Standards and Licensing Officers carried out licence compliance checks and tax compliance checks on a number of premises, while the Police provided a visible presence on foot patrol and carried out traffic speed and vehicle checks. Environment Protection Officers looked out for abandoned vehicles and fly tipping as well as conducting health spot-checks on food venues, while the Fire Service provided support with residential safety checks and Youth Workers engaged with local residents on the dangers of child criminal exploitation.

The impact event saw three fly tipping sites cleared (with evidence found at two of the sites), 38 wheelie bins tagged with guidance about proper usage, one abandoned vehicle, two venues inspected and subject to fire safety enforcement, two licensed premises found to have out-of-date licences, one unlicensed premises (found selling alcohol, out-of-date products and with a lack of staff training) closed down, speed checks conducted at five sites, five paving/road surface issues reported, one unroadworthy vehicle reported and two taxi firms checked and found to be compliant with child criminal exploitation guidance. Further Impact Days will be held in other locations in the district in the Spring.

Training – a new round of training on both Criminal Exploitation and Preventing Violent Extremism has been arranged for the coming months – if you would like to find out more and book a place please contact joss.mullett@eastsoffolk.gov.uk.

HEALTH AND SAFETY

We are supporting managers to follow the annual health and safety cycle which covers a different topic each month. The focus in October has been on work related stress with some promotional work for International Stress Awareness Day on 1 November. The Council has a legal duty to reduce work related stress and managers are key to this in that they need to consider the six areas that can contribute to work related stress ie demands, support, control, change, role and relationships. All Officers are expected to complete answer a series of questions that will, when the results are collated and anonymised by ICT, provide the manager with an overview of how well they are applying the management standards.

FOOD AND SAFETY

Our half-year return was submitted to the Food Standards Agency on the number of inspections carried out. A temporary Food and Safety Officer has been appointed to help reduce the back log of inspections created by a vacancy.

A court order for a tuberculosis (TB) case was extended for 28 days with the patient in hospital and receiving treatment. A further TB case has been identified that may need our involvement. Due to a national increase in cryptosporidium, our officers had to make contact with people to ask them to take part in a national online questionnaire. Two outbreaks of norovirus have been investigated.

We are continuing to receive gas and electrical inspection certificates from catering businesses. One business was visited by a Food and Safety Officer accompanied by a member of the Gas Safe National Investigations Team. Fault was found with a recently installed cooker.

SUFFOLK COASTAL PORT HEALTH

The most significant issues on the horizon remain the Border Target Operating Model and the funding challenges faced by the Port Health Authorities in the UK. Uncertainty still exists around funding for the service, charging models and potential trade volumes which questions the feasibility of having a functioning Border Target Operating Model in place by April 2024. This message seems to be consistent across other Port Health Authorities in the UK. We continue to liaise with the Department for Environment Food and Rural Affairs regarding these concerns.

Cabinet Member:	Councillor Paul Ashton, Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets
Contact Details:	paul.ashton@eastsoffolk.gov.uk Tel: 07824 838316

CUSTOMER EXPERIENCE

To increase our accessibility to residents and other customers who need in-person support, we've increased our Customer Experience opening times and locations across the district:

- First, our Marina reception in Lowestoft town centre is open on an additional day each week. The reception is now open to the public for both walk-in and pre-booked appointments between 9am and 1pm on Wednesdays. This is in addition to opening between 10am and 4pm every Tuesday and Thursday.

- Second, we are increasing onsite support at East Suffolk House in Melton by basing Customer Service Advisors there each weekday to assist visitors. While East Suffolk House is not advertised as a public-facing location, people are gravitating there to seek assistance given that it is one of our flagship buildings.

We'll analyse the impact of these additional days on an ongoing basis to see if the increased offer is fulfilling customer need and to inform future front-facing proposals.

During October we provided direct support to the relief effort in the wake of Storm Babet. We provided a face-to-face service over two days from Framlingham Town Council's offices alongside colleagues from the Housing Needs and Communities teams. We worked with the Digital team to put in place a specific 'flood issues' eform, feeding key requests for support into other teams. Customer Experience has handled 149 enquiries via phone, email and face-to-face in response to both Storm Babet and Storm Ciarán.

In November, we will engage in a process to review how we currently interact with our customers. This is a preamble to a wider plan to design and develop our future Customer Experience Strategy.

Finally, we've worked with our Digital and Facilities teams to deliver a new collaborative space at the Marina at zero cost. Through the simple reorganisation of space, we now have a useful facility for meetings, workshops, coproduction, service design and more.

HUMAN RESOURCES

The pay award for staff has finally been reached between the National Employers and the National Joint Council (NJC) Trade Union on rates of pay, which is applicable from 1 April 2023. This will see a rise of £1,925 for all staff up to and including salary scale point 43. Those above that scale will receive a salary increase of 3.88%. We are working to implement this pay award in time for the November pay run. On base salaries this task is straightforward but less so for East Suffolk Services staff due because their salaries are not assimilated with the NJC pay spine. This requires manual updates to records and we are working hard to achieve this within a short timescale.

The focus group sessions on the People Strategy are now complete and a new Strategy is being drafted based on two key themes, People and Culture. Several priorities will sit under each of these themes. The People Strategy will be presented at January's Cabinet.

Three new policies have also recently been approved: the Fertility Treatment Policy, Domestic Abuse Policy and Suicide Prevention Guidance. In addition, the Smoking Policy has also been updated to include vaping.

DIGITAL AND PROGRAMME MANAGEMENT

Our focus over the last quarter has been to review our Digital Work Plan to ensure it meets the needs and aspirations of all services across the authority. This is always an evolving plan to ensure we enable the authority to work efficiently, keep abreast of changes in technology and continue to move forward in areas of improvement and transformation.

The next major project to come to fruition over the coming months will be the migration and upgrade of our document management systems that support numerous statutory services such as Planning, Building Control and Environmental Health. This will result in easier ways in which customers can navigate associated documents online as well as enabling better remote working capabilities for officers out in the field.

We will also be focussing on implementing appropriate governance and monitoring of the new strategic plan, including Key Performance Indicator development over the coming months.

The digital service is measured by several Key Performance Indicators, predominantly to understand satisfaction with online services and performance of our digital environments. We remain a high performing service with an average rating in quarter 2 of 4.35 out of 5 for satisfaction with online services and 79% of incidents reported to our service desk resolved within the first working day of reporting.

Work has commenced on a self-assessment of our cyber security resilience using a framework from the National Cyber Security Centre. We aim to bring in the Local Government Association in the new year to further strengthen our position.

ASSETS

Developments, Acquisitions and Disposals

Following Cabinet s approval for the purchase of a retail site on Hamilton Road in Lowestoft, this acquisition is ready to complete in the coming days. The site provides accommodation in the Power Park, with future redevelopment potential to support the offshore energy sector.

Planning consent has been achieved for the development of the Nexus site in Lowestoft and demolition is due to commence before the end of November 2023.

The redevelopment of public conveniences at Fort Green in Aldeburgh is progressing with topographic surveys having been completed and a redesign by the appointed architects assessed internally.

The proposed Levelling Up Fund development at Jubilee Parade, Lowestoft (south beach) to add a terrace, new changing places/toilets, café and other retail units is progressing well. A planning application will be submitted in two parts for temporary works with demolition and main development.

Works have now been completed on the installation of a new pontoon in Oulton Broad to replace the former 'Colman's Jetty' that was in a poor state of repair. The pontoon increases the capacity of Oulton Broad for yachts and dinghies and will be managed by our Harbourmaster. We are awaiting installation dates for the rebuilding of the footbridge over the Landspring Drain.

Uniform, the lease management system, is fully up to date and the enterprise module has recently gone live which means that our leased assets and lease events can now be monitored and managed more effectively.

A significant number of landlord and tenant events (rent reviews and lease arrangements) have been identified as being outstanding as a result of the work to implement the Uniform system. The focus for the team is to progress outstanding lease renewals and rent reviews within the next 12 months. To assist in achieving this, a portion of this work has been outsourced. Bringing this work up to date will ensure that we are acting as a diligent landlord.

A new lease to Suffolk County Council has been completed for use of the Annex building on the Riduna Park site. Our move to hybrid working means that less office space is required and

since the Annex had been empty for some time, the lease to Suffolk County Council will bring in some additional rental income and reduce our operational costs.

Cabinet Member:	Councillor Toby Hammond, Cabinet Member with responsibility for Economic Development and Transport
Contact Details:	toby.hammond@eastsoffolk.gov.uk Tel: 07717 314171

Flooding response

In addition to the flooding impact of Storm Babet on residential properties in the district, 36 business premises were also affected. The largest concentration by far was in Framlingham although businesses in Southwold and Wickham Market were also impacted. In response, our team contacted all affected businesses to understand the impact of the flooding, to provide immediate support and to collate information in advance of flood recovery funding being awarded by Government. We are also working closely with Town Councils and business associations/groups, such as the Framlingham Technology Centre and the Framlingham Farmers collective.

Key issues identified through our contact with affected businesses include:

- businesses having inadequate/no insurance or high excess/premiums on top of having to pay for repairs
- extensive loss of stock
- the impact of lost trade
- concerns over future flooding risk

National support for flood affected businesses will include a 3-month business rates 'holiday' up to £2,500 for small and medium sized enterprises and up to £5k to assist with adaptations to avoid/alleviate future flood damage.

Space Enterprise Lab

We are working closely with partners to establish the region's first Space Enterprise Lab (SEL). This is located at BT's Adastral Park in Martlesham and forms part of the national Satellite Applications Catapult. The SEL provides physical office space to support businesses operating in the space sector which, across the UK, is worth over £16bn per annum and employs over 45,000. The key areas of activity the SEL will focus on include satellite communications/applications, broadcast technology and optics/photonics.

As one of only three regions not to have such a facility, the East of England was not capitalising on the opportunities this sector presents. Locating the SEL within the district puts us at the heart of this expanding sector and aligns strongly with BT's existing satellite application activities as well as strengthening links with the district's other innovation centres at ORBIS (renewable energy) and the Centre for Environment, Fisheries and Aquaculture Science (marine science).

The Local Enterprise Partnership (LEP) was successful in securing external funding to recruit a Space Cluster Manager who will manage the new facility which will also provide digital conferencing, virtual demonstrations, access to industry experts and events/exhibition space.

BT has agreed to provide rent free accommodation for the first two years and we, along with Suffolk County Council and the LEP, are providing £30k to fit out the new office space and supply IT equipment. As a result of our funding and proactive support for the project, we will form part of the SEL governance structure and maintain our strong links with innovation at Adastral Park.

Place Partnership Project

We are about to agree a lease on the former Tesco building on London Road North in Lowestoft to pilot a cultural activity programme ahead of the opening of the Towns Fund Cultural Quarter initiative in 2026. The First Light Festival Community Interest Company has been commissioned to lead a consortium of local and regional cultural and creative organisations to develop a pilot programme which would operate out of the former Tesco building for up to 2 years. This pilot activity will provide an opportunity to test what programming will appeal to audiences and will be invaluable in ensuring the Cultural Quarter is as successful as possible.

An expression of interest to Arts Council England's Place Partnership fund has been made to fund the pilot programme. The Arts Council has indicated that we could bid for up to £700k. Feedback on the expression of interest will be received shortly and if positive, a full application will be made by the end of 2023 with a decision by March 2024. If successful, the pilot programme would begin in April 2024.

Sizewell C Economic Development Programme/recruitment

Through the Sizewell C Deed of Obligation, we secured £5.2m to support local businesses who may be negatively impacted by the development and to ensure they are well placed to take advantage of any supply chain opportunities. One key impact identified was the potential for displacement ie employees in local businesses taking roles as part of the Sizewell C development and thereby creating recruitment issues in an already tight labour market. Conversely, there are also opportunities for such businesses to benefit from being part of the Sizewell C supply chain. A programme will be developed to address both the local business impact and opportunities which will identify how the £5.2m will be allocated in support of this. This work will supplement existing business support and skills development activity being delivered locally by the team and more widely through the County Council and Suffolk Chamber of Commerce.

In anticipation of the Development Consent Order being triggered in January 2024, a Sizewell C Economic Programme Manager will be recruited shortly to lead this work and develop the programme. This role will also represent us on the Sizewell C working groups for local supply chain development and skills, employment and education. There will also be a close working relationship with the soon to be appointed Sizewell C Tourism Programme Manager due to strong crossover in the areas of business support and skills development.

North Lowestoft Heritage Action Zone completion

The North Lowestoft Heritage Action Zone (HAZ), which has provided support, training and grant funding to bring historic buildings back into use in the town's medieval high street, successfully concluded in October following a 5-year delivery period. The programme delivered better research into the historical significance of the area and improvements to 15 buildings via £500k of public and private investment. High profile works included the restoration of Mariner's Arch and Crown Score.

The foundation for the programme was created through the Scores and Triangle Market master planning work to increase footfall and implement improvements to pedestrian access

and the delivery of quality open spaces and cultural events in the newly opened Ness Park. The HAZ supported retail and leisure businesses within the town centre boundary, including the reintroduction of market events in Triangle Market and ‘shop local’ campaigns. In addition, an array of cultural activities have been delivered since the HAZ’s inception in 2018, which promoted local businesses and had strong community engagement reaching 10,000 people.

We also helped secure £3.5m of external funding to progress the restoration and redevelopment of the former Lowestoft Town Hall, with the aim of bringing the building back into use in early 2026. This is the flagship heritage project in the HAZ and with an allocation of £2m from the Lowestoft Towns Fund and our contribution of £900k, support funding is now in place to progress.

Parking Services

We are supporting our market towns with the provision of free parking sessions on Remembrance Sunday and a further two sessions on the lead up to Christmas. The first session (on a date of their choice) will support their Christmas lights switch on event and the second will be on Saturday 16 December.

We are also looking at plans for full resurfacing works at Chapel Lane car park in Wickham Market which will include the provision of larger parking bays and the team is also working with local market traders where there are problems with limited parking for larger vehicles/parking for trader vehicles closer to market locations. We have also supported mobile ‘pop-up’ dentists to enable residents to access this service.

Our work with Town and Parish Councils includes identifying areas that require a change in parking policy eg the introduction of new resident parking schemes, or changes to on street parking. We are in the process of engaging with Beccles and Bungay Town Councils to better understand the issues that the current parking provision presents in those towns. Proposals have already been drafted for changes in Felixstowe and Southwold and through our engagement with the Town Councils there, we hope to finalise what we want to take forward into a new Traffic Regulation Order.

Cabinet Member:	Councillor Tom Daly, Cabinet Member with responsibility for Energy and Climate Change
Contact Details:	tom.daly@eastsoffolk.gov.uk Tel: 07825 720877

ENERGY

Following the Motion to Full Council on 27 September, a letter was sent to the Rt Hon Claire Coutinho, Secretary of State for Energy Security and Net Zero, regarding Sizewell C and the cumulative impacts of uncoordinated Nationally Significant Infrastructure Projects (NSIPs) on the Suffolk coast. The letter included the following specific requests, and we await a response:

1. A full cost benefit analysis of the options for connecting all the currently proposed and consented offshore wind, multi-purpose interconnectors and reinforcement projects to users in the UK, with prioritisation being given to offshore solutions connecting the power directly to areas where the demand is needed and the utilisation of brownfield sites.

2. Assistance to ensure that the consenting process related to the NSIPs proposed within East Suffolk is coordinated.
3. A commitment to mandatory community benefits for communities directly impacted by hosting energy infrastructure.

Engagement with civil servants within various departments of Government in relation to NSIPs continues including a recent meeting with a specific focus on skills.

Sizewell C - engagement with Sizewell C Limited on the project continues. A number of discharge of requirement applications have been submitted which are currently being considered. In addition, we are reviewing discharge of requirement consultations from Suffolk County Council and planning applications for works outside, but associated with, the consented development.

The website has been updated to provide significantly more information on the Sizewell C project; this is the main location for information - [Sizewell C Nuclear Power Station » East Suffolk Council](#).

LionLink - National Grid Ventures held a further non-statutory consultation on their LionLink multi-purpose interconnector project which closed on 3 November 2023. The consultation focused on the changes made since the last consultation in 2022. We provided a response to the proposals maintaining an objection to the project - [ESC-response-to-Lionlink-supplementary-non-statutory-consultation-Sept-Nov-2023.pdf \(eastsuffolk.gov.uk\)](#). During the consultation period, a meeting was held to listen to the views of Town and Parish Councils affected by the proposed scheme changes and their comments were taken into consideration within our response.

Sea Link - National Grid Electricity Transmission is currently holding its statutory consultation on the Sea Link project which comprises grid reinforcement works. The consultation closes to electronic submissions on 18 December. Officers are currently reviewing the published materials and we will be providing a formal response shortly. National Grid provided a briefing to Cabinet Members on 6 November and it is anticipated that a paper will be presented to Cabinet in relation to this project shortly.

Cabinet Member:	Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management
Contact Details:	kay.yule@eastsuffolk.gov.uk Tel: 07825 716370

PLANNING POLICY AND DELIVERY

Public consultation on the Custom and Self Build Supplementary Planning Document (SPD) took place during between 6 September and 18 October - responses are currently being considered. Consultation on the Healthy Environments SPD and on the Rural Development SPD will take place between November and January and will be available to view on our planning policy consultations page once the consultations begin. Early work is also underway on a review of the existing SPD for the Kirkley Waterfront and Sustainable Urban

Neighbourhood site. These SPDs are important documents, providing additional guidance to support the implementation of the Local Plan policies.

We are delighted that the East Suffolk Cycling and Walking Strategy has been shortlisted in the national Royal Town Planning Institute Awards, in the category of Excellence in Digital Planning Practice.

Communities are continuing to prepare Neighbourhood Plans, setting out planning policies for their local areas. The Wickham Market Neighbourhood Plan is the latest to have passed a successful referendum and is being considered at Full Council on 22 November. This will be the 23rd 'made' Neighbourhood Plan for East Suffolk, with many more under preparation.

We are looking forward to our upcoming event for Town and Parish Councils on Neighbourhood Planning on 23 November.

The review of Conservation Area Appraisals is also continuing with the new Aldeburgh Park Conservation Area and extensions to the existing Aldeburgh Conservation Area having been approved by the Strategic Planning Committee in October. A public consultation on the Walberswick Conservation Area is currently under way (16 October - 27 November), proposing to bring the Walberswick Quay area into the Walberswick Conservation Area. Reviews of the Article 4 directions in Conservation Areas in the former Waveney area are also underway, along with a pilot project in the former Suffolk Coastal area.

Judging has been taking place for this year's Quality of Place Awards and we are looking forward to the awards ceremony where the winners will be announced later in the year.

BUILDING CONTROL

The Building Safety Regulator has confirmed that the April 2024 deadline for Building Inspectors to become individually validated for competence will not be extended. All of our Building Control Officers have completed applications to the Building Safety Regulator scheme and are booked to sit professional competence validations on 6 December or are preparing to sit professional examinations with the Chartered Association of Building Engineers. This will be the biggest change in the profession's history with all Building Inspectors being known as Registered Building Approvers in line with the new competence regime.

COASTAL PARTNERSHIP EAST

The Board for Coastal Partnership East met in September and received quarterly updates on the work of the team and how this is delivering against the Business Plan. The meeting reflected on Storm Agnes in August which impacted residents and infrastructure in Hemsby, Pakefield and Thorpeness. It was an unprecedented storm of this nature in the Summer.

We have been dealing with further storm events (Babet and Ciarán) and along with Building Control colleagues, addressing the need for demolition of at risk properties in Pakefield.

We led a very successful Anglian Regional Flood and Coast Committee conference at Wherstead park on 12 October with 230 delegates attending in person and others joining virtually. The event was a great opportunity to showcase work from across Norfolk, Suffolk and Essex and John Curtin (the Environment Agency's Executive Director of Operations) gave

the keynote speech remarking on the complex and challenging impact of climate change and sea level rise and highlighting the pace of change and our ability to react. Karen Thomas presented the local challenges we face and how we are looking to both traditional and adaptation approaches. Several members of the team received awards for their role in coastal work and it was great to see their efforts recognised. Kya Plowman won the award for 'Rising Star' so congratulations to her!

The first Resilient Coast Project Board met at the start of October and was a milestone at the start of our £9.1m project to support coastal adaptation and resilience with Great Yarmouth Borough Council.

Finally, we held our Lowestoft tidal walls opening ceremony on 20 October and submitted our Transport and Works Act Order for the Lowestoft Tidal barrier to the Secretary of State. We await news of funding for the barrier in the Autumn Statement.

Cabinet Member:	Councillor Vince Langdon-Morris, Cabinet Member with responsibility for Resources and Value for Money
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FINANCIAL SERVICES

We are now in one of our busiest times of the year, working with service areas to review and update revenue and capital budgets for the next financial year and the Medium-Term Financial Strategy (MTFS). A report on the draft MTFS was presented to Cabinet on 7 November, with subsequent MTFS and budget reports to follow in January and February.

Jenson Hammond has recently joined the team as an Apprentice. Jenson previously worked in private accountancy practice and is continuing his accountancy studies with us. The team has been a fantastic support to Lorraine Rogers whilst she acted up into the Chief Finance Officer and Section 151 Officer role over the last 8 months and this has also provided development opportunities for other members of the team with Marie McKissock, Danielle Patterson and Georgina Peck taking on additional responsibilities.

Storm Babet funding support – we, along with other teams across the authority, are working with Suffolk County Council and across the district to rapidly establish a system to distribute flood relief funds to affected residents and businesses, as promised by Government. Our experience during Covid to provide funding support to businesses at pace will allow us to quickly modify and use these systems effectively again whilst ensuring that the required levels of compliance are in place.

PROCUREMENT

The Procurement Act 2023 received Royal Assent in October and work has begun on identifying processes which will need to change to reflect the new regulations which will come into force in October 2024. In addition, we are updating the procurement guidance to ensure compliance with the Contract Procedure Rules and Public Contract Regulations 2015.

We delivered 'Introduction to Procurement' training to 55 Officers over the Summer and further training has been offered on contract management and Social Value which has been well attended by Officers. We are also working with colleagues from the Digital and

Programme Management service looking at improvements in analysing spend to better inform procurement decisions.

As our new strategic plan develops, we will need to revise the current Procurement Strategy to align with the objectives set out in “Our Direction 2028”. Members and Officers will take part in a workshop in January to help identify and direct procurement priorities for the Council.

Cabinet Member:	Councillor Rachel Smith-Lyte, Cabinet Member with responsibility for the Environment
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The Environmental Protection team continue to progress the application for the small waste incinerator plant at VC Cooke, Beccles. The public consultation and drop-in sessions generated over 200 responses. A summary of these and our response in relation to the permitted process criteria will be placed on the website. A list of Frequently Asked Questions has also been added to the website.

Another successful year for Suffolk Solar Together – we co-fund the Suffolk Solar Together Scheme as part of our membership of the Suffolk Climate Change Partnership. The scheme has been operating since 2018 to help private homeowners and businesses install solar PV, batteries and electric vehicle chargers. Last year alone, 5,711 solar panels were installed across the county, with 1,803 of those installed in East Suffolk. This year 1,184 people in the district have registered their interest in solar PV installations to be delivered in 2024 – the highest number to date.

Climate Change & Sustainability Team recruitment completed - the team has now doubled in size, with officers Paul Mackie and Daniel Wareing joined by apprentice Jamie Bretton in September and Suffolk Graduate apprentice Amy Duran in October.

Environment Task Group (ETG) - the ETG held its third meeting in October where it reviewed its priority focus areas and discussed opportunities to support our property retrofitting work with Officers from Suffolk’s Warmer Homes Healthy People and our Housing teams.

Visit to Wild Aldhurst - as part of their ongoing programme of opportunities to visit and learn about local sites of environmental interest, the Greenprint Forum visited Wild Aldhurst on 23 October and received a guided tour of this habitat restoration scheme on a former arable farm of 67 hectares, 2 km inland of the Sizewell power stations. Forum members saw and heard how the impact of Sizewell C on local biodiversity is being mitigated. A short report summarising the visit has been produced [Report-Wild-Aldhurst-231023.pdf \(eastsoffolk.gov.uk\)](#).

Community Litter Picking

Our Strategic Waste and Contract Management team has taken over the co-ordination of Community Litter Pick applications. Since 1 August a total of 30 groups have registered with

us and have received equipment (if required), including hoops, sticks and bags. Groups organise a collection point for the bags so that East Suffolk Services can then dispose of the contents. 632 people have attended organised litter picks and information on the amount of waste collected takes time to analyse, but one group collected 19 bags worth!

Wildflower areas

There are a number of projects taking place across the district by local groups/Town and Parish Councils to use land maintained by us as areas for wildflowers. These groups are working with us to identify sites for them to maintain and so they are not included in the cutting rounds. We will share the results with you in due course.

Grass Cutting

The weather during 2023 has had an impact in terms grass growth across the district. This saw the normal May flourish of growth continue vigorously throughout the Summer meaning that cutting had to be more infrequent with rounds taking longer to complete. We are working with East Suffolk Services to review schedules for the future and will look to provide more information to the public in order to manage expectations.

Litter and Fido Bin Policy

We have created our first ever policy to determine the process and rationale for siting litter and fido bins in public places. This is going through a period of stakeholder consultation before being adopted.

Treescape Funding

We have been successful in a joint funding bid with Suffolk County Council and other Suffolk local authorities for the Woods Meadow Country Park in Oulton. This will see the planting of 30 fruit trees for a community orchard and 300 whips to create more hedgerows and wildlife areas. Formal notification is still being awaited, but the planting is expected to take place in early 2024.

Fly Tipping

We are working in partnership with Environmental Protection and East Suffolk Services to review the process for reporting and clearing fly tipping on our land and there is a Member Briefing on 4 December to provide information on fly tipping clearance as a service.

Street Cleansing Pilots and Street Cleansing Working Group

We are running two pilots in Felixstowe and Lowestoft in readiness for the delivery of a new specification for Street Cleansing by East Suffolk Services. This is a challenging specification and the decision was made to concentrate on delivering this in two areas within the district to determine the resources and strategies required to meet expected standards.

Early successes have seen the use of a new hot pressure washer to deep clean a toilet block and play equipment, as well as a seafront shelter in Felixstowe and the deployment of more staff in Lowestoft town centre to litter pick.

Following a Motion to Full Council in September, a cross party Member working group has been set up, chaired by Paul Ashton, to look at the cleanliness of the district. Thank you to those Members who have responded to the questionnaire sent out in October. Updates in relation to this group will follow.

Simpler Recycling

Government has now published its plans for mandatory recycling services across England. The funding of these services will come from Government and through Extended Producer Responsibility. The Suffolk Waste Partnership now has some further certainty over how collections to recycling will change, but there is still further consultation taking place before any implementation takes place.

Storm Babet

East Suffolk Services provided householders with invaluable support during the recent flooding, particularly in Framlingham where around 40 tonnes of flood damaged household items were collected and taken for disposal.

WEEE Collection funding

Our application to Material Focus, a producer compliance scheme, was successful and we have been awarded £60k to introduce a kerbside collection of small electrical appliances. This service will be introduced in due course, once the infrastructure and arrangements have been finalised.

Appendices

Appendices:
None

Background reference papers:
None